2022-0000017

F I L E D

SAN FRANCISCO County Clerk

March 9, 2022

by: Giselle Rosso

Deputy County Clerk

POSTED MAR 09 2022 TO:

San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
www.sfplanning.org

PUBLIC NOTICE

# Availability of notice of preparation of an environmental impact report and initial study and notice of public scoping meeting

| PROJECT INFORMATION | | PUBLIC SCOPING MEETING INFORMATION | |
|---|---|---|---|
| ***Project Title:*** | ***San Francisco Gateway Project*** | *Meeting Date:* | Wednesday, March 30, 2022 |
| *Project Address:* | 749 Toland Street and 2000 McKinnon Avenue | *Time:* | 6 p.m. |
| **Case No.:** | **2015.012491ENV** | *Location:* | Virtual Public Scoping Meeting by Zoom conference or telephone. You can register for the meeting via the online platform link at: http://sf-planning.org/sfceqadocs or join by phone, using the following phone number: (408) 638-0968 - Meeting ID: 865 7991 0030 |
| *Block/Lot No.:* | 5284A/008 and 5287/002 | | |
| *Zoning District(s):* | PDR 2 – Core Production, Distribution, and Repair Industrial Protection Zone Special Use District 65-J Height and Bulk District | | |
| *Neighborhood:* | Bayview | | |
| *Project Sponsor:* | Ken Sun, Prologis Inc. – (510) 661-4027 | | |
| *EIR Coordinator:* | Elizabeth White – (628) 652-7557 elizabeth.white@sfgov.org | | |

The San Francisco Planning Department (department) has issued a notice of preparation (NOP) of an environmental impact report (EIR) and an initial study in connection with this project. Next, the department will begin the preparation of an EIR, as required by the California Environmental Quality Act. The department welcomes your comments regarding the scope of the EIR as well as comments on the initial study. Refer to the Project Description and Purpose of Notice sections below for more information.

## Project Description

*Proposed Project*

The project sponsor, Prologis Inc., proposes to redevelop two parcels in a core industrial area of the City and County of San Francisco (city). The proposed project would construct two new multi-story production, distribution, and repair (PDR)[1] buildings that would provide new industrial space for the city. The project site

[1] PDR use is a grouping of uses that includes but is not limited to all industrial and agricultural uses, ambulance services, animal hospitals, automotive service stations, automotive repair, automotive wash, arts activities, business services, cat boarding, catering

is in the Bayview Hunters Point Area Plan and is bounded by Kirkwood Avenue to the north, Rankin Street to the east, McKinnon Avenue to the south, and Toland Street to the west. An elevated portion of Interstate 280 bisects the project site. The initial study contains a comprehensive project description, including figures, and a preliminary list of required project approvals.

The project sponsor would demolish the four existing single-story buildings that are currently occupied by PDR space, which encompass 448,000 gross square feet.[2] This would be followed by construction of two three-story buildings (with active roofs): buildings A and B. Each building would be 97 feet tall and would have a maximum height of 115 feet, including rooftop appurtenances. The two new buildings (including PDR space, logistics yard, vehicular circulation systems, and ground-floor retail spaces) would total 2,160,000 gross square feet. The proposed project would provide space for several main types of PDR uses: manufacturing and maker space,[3] parcel delivery and last-mile delivery,[4] wholesale and storage, and fleet management. Each building would include a combination of enclosed and partially enclosed spaces, with a multi-level vehicular system (comprising staging, circulation, and logistics yard areas) serving each level. In both buildings, all three levels of the PDR space would have direct vehicular access via a one-way ramp system for vehicles as large as tractor trailers. The roof level would provide a solar array and a screened, open-air multi-purpose deck that could be used for parking and/or material and vehicle staging. Each building would include 35,000 gross square feet of ground-floor maker space and 8,400 gross square feet of ground-floor retail space.

The project proposes to convert Kirkwood Avenue (along the northern side of the project site, between Toland and Rankin streets) to a single-lane, eastbound one-way street; and convert a portion of McKinnon Avenue (along the southern side of the project site, between Toland and Selby streets) to a single-lane, westbound one-way street. Both of these streets currently serve travel in both directions.

The project site does not currently have sidewalks or curb cuts. The proposed project would construct new 10-foot-wide sidewalks along the site's perimeter (including Selby Street) and would create seven new curb cuts of varying widths for access to each new building. The new sidewalks would be designed in accordance with San Francisco's Better Streets Plan standards for industrial roads. Other streetscape modifications include new striped parking spaces along the perimeter of the project site; a portion of the required bicycle parking spaces (most of the required spaces would be provided on the ground floor of the buildings); and street trees.

The proposed project's foundation design is expected to be concrete spread footings and/or grade beams on improved and engineered soil, with excavation for the foundations likely to extend 10 feet below existing grade. Soil improvement would be necessary to support the buildings. Approximately 7,000 vibratory replacement stone columns would be extended 25 feet deep, and approximately 900 auger cast piles would

services, commercial storage, kennels, motor vehicle tow services, livery stables, parcel delivery services, public utilities yards, storage yards, trade offices, trade shops, wholesale sales, and wholesale storage.

2 Gross square footages and square footages presented for the existing and proposed uses are approximate.

3 This is defined as a light industrial use that provides for the fabrication or production of goods, by hand or machinery, for distribution to retailers, wholesalers, or the public. Makers are often characterized by their production and custom activities, which usually involve individual or special design, handiwork, and/or design-related innovation and experimentation.

4 Last-mile delivery is defined as the movement of goods from a transportation hub to the final delivery destination (i.e., typically a personal residence or business).

be extended 60 feet deep, to support the buildings onsite. The project does not propose any pile driving. Approximately 140,600 cubic yards of soil would be excavated for the proposed project.

*Expanded Streetscape Variant*

The environmental review also analyzes an expanded streetscape variant. The expanded streetscape variant comprises the same land uses and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. Refer to the initial study project description for more detailed information on the expanded streetscape variant.

## Purpose of Notice

The department has determined that an EIR must be prepared for the proposed project prior to any final decision regarding whether to approve the project. The purpose of the EIR is to provide information about potential significant physical environmental effects of the proposed project; to identify possible ways to minimize the significant effects; and to describe and analyze possible alternatives to the proposed project. Preparation of an NOP or EIR does not indicate a decision by the city to approve or to disapprove the proposed project. However, prior to making any such decision, the decision makers must review and consider the information contained in the EIR.

The department has prepared an initial study, which is attached to the NOP, in order to scope the contents of the EIR. Comments on the initial study as well as the scope of EIR will be received for a 30-day period, commencing on March 9, 2022 and ending on 5 pm April 8, 2022.

**You are not required to take any action.** If you wish to provide comments on the scope of the EIR, or comment on the initial study, you may do so in either or both of the following ways:

**WRITTEN COMMENTS**

*Planner:* **Elizabeth White, Senior Environmental Planner**
*Via Mail:* **49 South Van Ness Ave, Suite 1400**
**San Francisco, CA 94103**
*Via Email:* CPC.SFGatewayProject@sfgov.org

**From March 9, 2022, to 5 p.m. on April 8, 2022**

**COMMENTS AT THE SCOPING MEETING**

**Wednesday, March 30, 2022, 6 p.m.**

Virtual Public Scoping Meeting by Zoom conference or telephone. You can register for the meeting via the online platform link at: http://sf-planning.org/sfceqadocs or join by phone, using the following phone number: (408) 638-0968 - Meeting ID: 865 7991 0030

On the date indicated above, the department will hold a scoping meeting to receive verbal comments to assist the department in reviewing the scope and content of the environmental impact analysis and information to be contained in the EIR as well as comments on the initial study. To request a language interpreter or to accommodate persons with disabilities at the scoping meeting, please contact the staff listed above at least 72 hours in advance of the meeting.

If you work for a responsible or trustee agency, we need to know your agency's views regarding the scope and content of the EIR as it pertains to your agency's statutory responsibilities in connection with the proposed project; your agency may need to use the EIR when considering a permit or other approval for this project. We will also need the name of the contact person for your agency. If you have questions concerning environmental review of the proposed project, please contact the planner listed above.

This notice is available for public review on the department's website at sfplanning.org/sfceqadocs and at the San Francisco Permit Center, 49 South Van Ness Avenue, 2nd Floor, San Francisco, CA 94103. Referenced materials are available through the following department web pages: sfplanning.org/sfceqadocs and sfplanning.org/resource/permits-my-neighborhood.

## General Information about Procedures

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

This notice is being issued during the suspension of certain CEQA posting requirements pursuant to San Francisco Administrative Code Chapter 31 requirements. This notice complies with local requirements under the March 23, 2020, Fifth Supplement to the Mayoral Proclamation Declaring the Existence of a Local Emergency dated February 25, 2020.

San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
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# PUBLIC NOTICE

# NOTICE OF PREPARATION OF ENVIRONMENTAL IMPACT REPORT AND NOTICE OF A PUBLIC SCOPING MEETING

| | |
|---|---|
| *Date:* | March 9, 2022 |
| *Case No.:* | 2015.012491ENV |
| *Project Title:* | San Francisco Gateway Project |
| *Project Address:* | 749 Toland Street and 2000 McKinnon Avenue |
| *Zoning:* | PDR-2 – Core Production, Distribution, and Repair<br>Industrial Protection Zone Special Use District<br>65-J Height and Bulk District |
| *Block/Lot:* | 5284A/008 and 5287/002 |
| *Lot Size:* | 743,800 square feet |
| *Project Sponsor:* | Ken Sun, Prologis Inc. – (510) 661-4027<br>ksun@prologis.com |
| *Lead Agency:* | San Francisco Planning Department |
| *Staff Contact:* | Elizabeth White – (628) 652-7557<br>elizabeth.white@sfgov.org |

## Introduction

The San Francisco Planning Department (department) prepared this notice of preparation of an environmental impact report (EIR) in connection with the proposed San Francisco Gateway project (749 Toland Street and 2000 McKinnon Avenue) (proposed project). The purpose of the EIR is to provide information regarding the physical environmental effects of the proposed project; identify possible ways to minimize any potentially significant adverse effects; and describe and analyze possible alternatives to the proposed project. The department is issuing this notice to inform the public and responsible and interested agencies about the proposed project and the intent to prepare an EIR, and to provide notice of a public scoping meeting to solicit comments on the scope of the EIR. The department will hold the public scoping meeting on Wednesday, March 30, 2022 at 6 p.m., using an online platform. You may view this notice and register to join the meeting via the online platform link found on the department's webpage, sfplanning.org/sfceqadocs (under "SF Gateway Project); or by phone, using the following phone number and meeting identification number: (408) 638-0968; , meeting ID: 865 7991 0030.

## Project Description

The project sponsor, Prologis Inc., proposes to redevelop two parcels in a core industrial area of the City and County of San Francisco (city). The proposed project would construct two new multi-story production, distribution, and repair (PDR)[1] buildings. The project site is in the Bayview Hunters Point Area Plan and is bounded by Kirkwood Avenue to the north, Rankin Street to the east, McKinnon Avenue to the south, and Toland Street to the west. An elevated portion of Interstate 280 bisects the project site. The attached initial study contains a comprehensive project description, including figures, and a preliminary list of required project approvals.

The project sponsor would demolish the four existing single-story buildings that are currently occupied by PDR space, which encompass 448,000 gross square feet.[2] This would be followed by construction of two three-story buildings (with active roofs): buildings A and B. Each building would be 97 feet tall and would have a maximum height of 115 feet, including rooftop appurtenances. The two new buildings (including PDR space, logistics yard, vehicular circulation systems, and ground-floor retail spaces) would total 2,160,000 gross square feet. The proposed project would provide space for several main types of PDR uses: manufacturing and maker space,[3] parcel delivery service including last-mile delivery,[4] wholesale and storage, and fleet management. Each building would include a combination of enclosed and partially enclosed spaces, with a multi-level vehicular system (comprising staging, circulation, and logistics yard areas) serving each level. In both buildings, all three levels of the PDR space would have direct vehicular access via a one-way ramp system for vehicles as large as tractor trailers. The roof level would provide a solar array and a screened, open-air multi-purpose deck that could be used for parking and/or material and vehicle staging. Each building would include 35,000 gross square feet of ground-floor maker space and 8,400 gross square feet of ground-floor retail space.

### Proposed Circulation, Access, and Travel Demand Management

Vehicular access to and circulation around the project site would use the existing streets, with two exceptions. The project proposes to convert Kirkwood Avenue (along the northern side of the project site, between Toland and Rankin streets) to a single-lane, eastbound one-way street; and convert a portion of McKinnon Avenue (along the southern side of the project site, between Toland and Selby streets) to a single-lane, westbound one-way street. Both of these streets currently serve travel in both directions. These proposed circulation modifications are shown in Figure 17, Proposed Roadway Modifications Surrounding the Project Site (p. 30) of the attached initial study.

The project site does not currently have sidewalks or curb cuts. The proposed project would construct new 10-foot-wide sidewalks along the site's perimeter (including Selby Street) and would create seven new curb cuts of varying widths for access to each new building. The new sidewalks would be designed in accordance with San

[1] PDR use is a grouping of uses that includes but is not limited to all industrial and agricultural uses, ambulance services, animal hospitals, automotive service stations, automotive repair, automotive wash, arts activities, business services, cat boarding, catering services, commercial storage, kennels, motor vehicle tow services, livery stables, parcel delivery services, public utilities yards, storage yards, trade offices, trade shops, wholesale sales, and wholesale storage.

[2] Square footages presented for the existing and proposed uses are approximate.

[3] This is defined as a light industrial use that provides for the fabrication or production of goods, by hand or machinery, for distribution to retailers, wholesalers, or the public. Makers are often characterized by their production and custom activities, which usually involve individual or special design, handiwork, and/or design-related innovation and experimentation.

[4] Last-mile delivery is defined as the movement of goods from a transportation hub to the final delivery destination (i.e., typically a personal residence or business).

Francisco's Better Streets Plan standards for industrial roads. Other streetscape modifications include new striped parking spaces along the perimeter of the project site; a portion of the required bicycle parking spaces (most of the required spaces would be provided on the ground floor of the buildings); and street trees. The proposed nine street trees on the eastern sidewalk of Toland Street along the northern half of the building (from the building A entrance to Kirkwood Street) would serve as wind mitigation measures; they would be approximately 25-foot-tall evergreen street trees with a 15-foot-diameter canopy.[5] Refer to Figure 19, Proposed Streetscape Plan (p. 34) of the attached initial study for more detailed information on the proposed streetscape modifications.

The proposed project's foundation design is expected to be concrete spread footings and/or grade beams on improved and engineered soil, with excavation for the foundations likely to extend 10 feet below existing grade. Ground improvements, such as stone columns, drill displacement columns, geopiers,[6] soil-cement mixing, or other similar methods, would provide vertical support through the existing soils to strengthen the undocumented fill that underlies the project site. Using drill rigs, approximately 7,000 vibratory replacement stone columns or drill displacement columns[7] would be extended 25 feet deep, and approximately 900 auger cast piles would be extended 60 feet deep, to support the buildings onsite. The proposed project would not require pile-driving activities. Approximately 140,600 cubic yards of soil would be excavated for the proposed project.[8] Of this total, approximately 42,600 cubic yards would be improved and reused, and the remaining 98,000 cubic yards would be exported offsite.

On June 7, 2021, the project sponsor submitted a priority processing application under Planning Director's Bulletin No. 2, committing the project to use the lowest diesel emitting off-road equipment (Tier 4 interim or final) for the duration of construction.[9,10] On June 15, 2021, the department approved this application.[11] Construction work would typically occur five to six workdays per week for eight hours per day over approximately 31 months. Nighttime construction activities (8 p.m. to 7 a.m.) are expected during specific construction phases; the project sponsor would seek city approval to extend specific construction activities beyond standard construction hours. The total number of temporary/short-term workers during construction is anticipated to range from approximately 2,500 to 3,000. Approximately 400 to 500 workers are expected to travel to the site daily at any given time during peak construction periods.

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[5] BMT, San Francisco Gateway Project Final Wind Microclimate Study, June 23, 2020.

[6] Geopier is an engineering term used to refer to stiff rock columns drilled deep into the earth's surface, down to a hard nonyielding depth. Geopiers are used to support a building foundation and reinforce the soil when the existing ground is unstable, wet or unsuitable for building construction.

[7] Drill displacement columns (or controlled low-strength material columns) are formed in displaced soil cavities and displace liquefiable and compressible soil with cemented controlled low-strength material. Controlled low-strength material column ground improvement can mitigate liquefaction and settlement of heavy foundations and slabs. Controlled low-strength material columns are ideal for sensitive project sites such as those near critical structures that require low noise and no vibration construction methods.

[8] The proposed project would entail excavation of 140,600 cubic yards of soil. This total includes 134,000 cubic yards of soil onsite and 6,600 cubic yards of soil for street improvements.

[9] Prologis, *Application for Priority Application Processing for Director's Bulletin No. 2,* June 7, 2021.

[10] Prologis, *Priority Application Processing for Clean Construction Projects, Supplemental Application for Type 3 Priority Projects for Director's Bulletin No. 2,* June 7, 2021.

[11] San Francisco Planning Department, *Signed Application for Priority Application Processing for Director's Bulletin No. 2,* June 15, 2021.

### Expanded Streetscape Variant

The environmental review also analyzes an expanded streetscape variant. The expanded streetscape variant comprises the same land uses and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. Refer to Figure 21, Expanded Streetscape Variant (p. 39) in the attached initial study project description for more detailed information on the expanded streetscape variant.

## Summary of Potential Environmental Issues

The department has prepared an initial study to evaluate the physical environmental effects of the proposed project and expanded streetscape variant. The initial study assessed project-specific and cumulative impacts for all topics required under the California Environmental Quality Act (CEQA); it also identified which environmental topic areas may be significantly impacted by the proposed project and expanded streetscape variant.

The initial study determined that the potential individual and cumulative environmental effects would be less than significant for the following topics: land use and land use planning; population and housing; greenhouse gas emissions; shadow; recreation; utilities and service systems; public services; biological resources; hydrology and water quality; hazards and hazardous materials; mineral resources; energy resources; agriculture and forestry resources; and wildfire. The initial study determined that the proposed project and expanded streetscape variant would result in significant impacts that could be reduced to less-than-significant levels with incorporation of mitigation measures that have been agreed to by the project sponsor for the following topics: cultural resources; tribal cultural resources; wind; and geology and soils.

In addition, the project and expanded streetscape variant meet all requirements of a transit-oriented infill development project under Public Resources Code section 21099[12] (Senate Bill 743); therefore, aesthetics and parking were not considered in determining whether the project or variant have the potential to result in significant environmental effects.

The initial study determined that the proposed project and expanded streetscape variant could result in potentially significant environmental impacts related to transportation and circulation; air quality; and noise. These topics will be discussed in an EIR, as discussed below. The EIR will also address other topics required by CEQA, including growth-inducing impacts; mitigation measures; significant unavoidable impacts; significant irreversible impacts; any known controversy associated with environmental effects, or alternatives; and issues to be resolved by the decision makers.

### Transportation and Circulation

The proposed project and expanded streetscape variant would generate new vehicle trips, resulting in additional vehicle miles traveled (VMT) to and from the project site. A transportation analysis will be prepared to evaluate person trips generated by the proposed project and expanded streetscape variant's operation and the associated mode split of these person trips (e.g., vehicle or transit); freight and passenger loading operations; site circulation; VMT impacts; transit service and capacity; code compliance; loading; hazards due to a project design feature, including to pedestrians and bicyclists; construction impacts; and emergency access. The

[12] *San Francisco Planning Department, Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis, San Francisco Gateway Project, December 19, 2018.*

transportation and circulation issues will be analyzed in accordance with the department's Transportation Impact Analysis Guidelines (2019).

### Air Quality

The air quality analysis will evaluate the consistency of the proposed project and expanded streetscape variant with applicable air quality plans; and the potential for the proposed project and variant to result in emissions of criteria air pollutants and other toxic air contaminants that may affect sensitive receptors, such as residents. The air quality analysis will include quantification of both construction-related and operational criteria air pollutant emissions. A health risk assessment will be prepared to evaluate potential long-term health effects from emissions during both construction and operation. The analysis will also discuss the potential for the proposed project and expanded streetscape variant to result in sources of odor.

### Noise

The noise analysis will evaluate short-term construction-related and long-term operation-related noise and vibration impacts that could result from the proposed project and expanded streetscape variant. The analysis will investigate the potential for noise sources from the proposed project to adversely affect nearby noise-sensitive receptors. This includes both stationary (e.g., heating, ventilation, and air conditioning and other mechanical systems) and mobile (e.g., delivery trucks arriving or departing from the project site) noise sources.

## Alternatives

Pursuant to CEQA and section 15126.6 of the state CEQA Guidelines, the EIR will also analyze a reasonable range of alternatives that would reduce or avoid one or more significant environmental impacts identified in the EIR, and will include an analysis of the comparative environmental impacts of feasible alternatives to the proposed project and variant. Alternatives will include a No Project Alternative, which will assume no change to the existing physical conditions on the project site, and one or more alternatives to address other significant effects of the proposed project that are identified in the EIR.

## Finding

The proposed project or variant may have a significant effect on the environment; therefore, an EIR is required. This finding is based on the criteria of the state CEQA Guidelines , sections 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and the reasons documented in the initial study for the project, which is attached. The purpose of the EIR is to provide information about potentially significant physical environmental impacts of the proposed project, identify possible ways to minimize the potentially significant impacts, and describe and analyze possible alternatives to the proposed project. Publication of a notice of preparation, initial study, or EIR does not indicate a decision by the city to approve or disapprove a proposed project or variant. However, before making any such decision, the decision makers must review and consider the information contained in the EIR.

## Public Scoping Meeting

Pursuant to CEQA section 21083.9 and CEQA Guidelines section 15206, the department will hold a public scoping meeting to receive verbal comments concerning the scope of the EIR. You may participate in the public process concerning the project's environmental effects by attending a video and teleconference on Wednesday, March 30, 2022, 6 p.m.. You may register for the meeting via the online platform link the department's webpage,

sfplanning.org/sfceqadocs (under "SF Gateway Project"); or by phone, using the following phone number and meeting identification number: (408) 638-0968; meeting ID: 865 7991 0030. To request assistance in additional languages, please contact candace.soohoo@sfgov.org or call (628) 652-7550; call at least 72 hours in advance of the meeting to ensure availability. Written comments will also be accepted at this meeting and until 5 p.m. on April 8, 2022. Written comments should be sent to Elizabeth White, San Francisco Planning Department, 49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103, or emailed to CPC.SFGatewayProject@sfgov.org.

The notice of preparation and initial study are available at sfplanning.org/sfceqadocs.[13] If you have questions or comments concerning this notice or the project's environmental review, or would like to request a USB or paper copy of the notice of preparation, contact Elizabeth White at CPC.SFGatewayProject@sfgov.org or (628) 652-7557.

If you work for a responsible or trustee agency, we need to know your agency's views regarding the scope and content of the environmental information that is relevant to your agency's statutory responsibilities in connection with the proposed project; your agency may need to use the EIR when considering a permit or other approval for this project. We will also need the name of the contact person for your agency.

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

Anyone receiving this notice is encouraged to pass on this information to others who may have an interest in the proposed project.

March 9, 2022
Date

Lisa Gibson
Environmental Review Officer

## ATTACHMENTS

San Francisco Gateway Project (749 Toland Street and 2000 McKinnon Avenue) Initial Study

[13] These documents (and all documents cited in this initial study, unless otherwise noted) are also available for review on the San Francisco Property Information Map, which can be accessed at http://sfplanninggis.org/PIM/?. Individual files can be viewed by entering the project address (749 Toland Street), clicking on the "Planning Applications" link, clicking on the "More Details" link under the project's environmental case number (2015-012491ENV), and clicking on the "Related Documents" link.

San Francisco Planning

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# INITIAL STUDY

| | |
|---|---|
| *Date:* | March 9, 2022 |
| *Case No.:* | 2015-012491ENV |
| *Project Title:* | San Francisco Gateway Project |
| *Project Address:* | 749 Toland Street and 2000 McKinnon Avenue |
| *Zoning:* | PDR-2 – Core Production, Distribution, and Repair<br>Industrial Protection Zone Special Use District<br>65-J Height and Bulk District |
| *Block/Lot:* | 5284A/008 and 5287/002 |
| *Lot Size:* | 743,800 square feet |
| *Plan Area:* | Bayview Hunters Point Area Plan |
| *Project Sponsor:* | Ken Sun, Prologis Inc., (510) 661-4027<br>ksun@prologis.com |
| *Staff Contact:* | Elizabeth White, (628) 652-7557<br>elizabeth.white@sfgov.org |

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# TABLE OF CONTENTS

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## List of Figures



## List of Tables

## Acronyms and Abbreviations

| | |
|---|---|
| AB | Assembly Bill |
| air board | California Air Resources Board |
| air district | Bay Area Air Quality Management District |
| BART | Bay Area Rapid Transit |
| board of supervisors | San Francisco Board of Supervisors |
| building department | Department of Building Inspection |
| Cal/EPA | California Environmental Protection Agency |
| CALGreen Code | California Green Building Standards Code |
| California Register | California Register of Historical Resources |
| CalRecycle | California's Department of Resources Recycling and Recovery |
| Caltrans | California Department of Transportation |
| CEQA | California Environmental Quality Act |
| city | City and County of San Francisco |
| $CO_2e$ | carbon dioxide equivalents |
| Cornerstone | Cornerstone Earth Group |
| EIR | environmental impact report |
| general plan | San Francisco General Plan |
| HVAC | heating, ventilation, and air conditioning |
| I-280 | Interstate 280 |
| LEED | Leadership in Energy and Environmental Design |
| mgd | million gallons per day |
| MMT | million metric tons |
| mph | miles per hour |
| Muni | San Francisco Municipal Railway |
| NPDES | National Pollutant Discharge Elimination System |
| OPR | Office of Planning and Research |
| PDR | production, distribution, and repair |
| PFYC | Potential Fossil Yield Classification |
| PG&E | Pacific Gas and Electric Company |
| planning code | San Francisco Planning Code |
| planning commission | San Francisco Planning Commission |

| | |
|---|---|
| planning department | San Francisco Planning Department |
| proposed project | proposed San Francisco Gateway project |
| SB | Senate Bill |
| SF Market | San Francisco Wholesale Produce Market |
| SFMTA | San Francisco Municipal Transportation Agency |
| SFPUC | San Francisco Public Utilities Commission |
| SSIP | Sewer System Improvement Program |
| TDM | transportation demand management |
| UCMP | U.C. Berkeley Museum of Paleontology |
| U.S. 101 | United States Highway 101 |
| U.S. EPA | United States Environmental Protection Agency |
| VMT | vehicle miles traveled |
| WSIP | Water System Improvement Program |

# INITIAL STUDY

**San Francisco Gateway Project**
**Planning Department Case No. 2015-012491ENV**

# A. PROJECT DESCRIPTION

## Introduction

The project sponsor, Prologis Inc., proposes to redevelop two parcels in a core industrial area of the City and County of San Francisco (city). The proposed San Francisco Gateway project (proposed project) would construct two new multi-story *production, distribution, and repair* (PDR)[1] buildings. The project site is located within the Bayview neighborhood. The site consists of two parcels that combine for a total gross site area of approximately 743,800 square feet (17.1 gross total acres).

Four one-story, metal clad buildings currently occupy approximately 448,000 gross square feet[2] of the project site. The project sponsor would demolish the four existing buildings and construct two three-story buildings (with active roof), buildings A and B. Each building would be approximately 97 feet tall from curb level to the highest point of the active roof level. Roof projections would be limited to the stair and elevator rooftop penthouse which would provide access and a solar array which would also screen the roof while generating electricity for onsite use. Including these elements, the maximum building height would be approximately 115 feet. The two new buildings (including PDR space, logistics yard, vehicular systems, and ground-floor retail spaces) would total approximately 2,160,000 gross square feet. This would result in 1,712,000 gross square feet of net new PDR and PDR support space on site.

The proposed project would provide space for several main types of PDR uses, each of which is described in detail below: manufacturing and maker space, parcel delivery service, including last-mile delivery,[3] wholesale and storage, and fleet management. Additionally, the project would allow for laboratory uses permitted in the PDR-2 zoning district, although this use is not part of the preferred project.[4] Each building would include a combination of enclosed and partially enclosed spaces, with a multi-level vehicular system (comprised of staging, circulation, and logistic yard areas) serving each level. In both buildings, all three levels of the PDR space would have direct vehicular access via a one-way ramp system for vehicles as large as tractor trailers. The roof level would provide a solar array and a screened, open-air multi-purpose deck that could be used for parking and/or material and vehicle staging. The proposed project would include a combined total of approximately 35,000 gross square feet of ground-floor maker space[5] and 8,400 gross square feet of ground-floor retail space in buildings A and B.

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1 PDR use is a grouping of uses that includes but is not limited to all industrial and agricultural uses, ambulance services, animal hospital, automotive service station, automotive repair, automotive wash, arts activities, business services, cat boarding, catering service, commercial storage, kennel, motor vehicle tow service, livery stable, parcel delivery service, public utilities yard, storage yard, trade office, trade shop, wholesale sales, and wholesale storage.

2 Square footages presented for the existing and proposed uses are approximate.

3 Last mile delivery is defined as the movement of goods from a transportation hub to the final delivery destination (i.e., typically a personal residence or business).

4 Laboratory uses permitted in the PDR-2 zoning district do not include life sciences laboratories.

5 In the preferred use mix, all of the maker and manufacturing space would be on the ground floor (i.e., level 1). However, this use could also be on floors 2 and 3 in the future.

The existing warehouse buildings were built by the U.S. military circa 1943 and were transferred to private ownership sometime in the 1970s. Since then, the project site has contained a functional PDR complex, providing mostly wholesale and storage, vehicle storage, and fleet management spaces within the existing single-story buildings. The proposed project would demolish these four single-story buildings and replace them with two three-story buildings with active roofs that would allow large trucks to access fully functional, upper-level PDR spaces.

### *Project Location and Site Characteristics*

As shown in Figure 1 (p. 3), the approximately 743,800-gross-square-foot (17.1 gross total acres), rectangular project site is located in the Bayview neighborhood of San Francisco, California. The street addresses of the existing buildings are 749 Toland Street and 2000 McKinnon Avenue. The project site consists of assessor's block 5284A, lot 008, and block 5287, lot 002, which are occupied by four structures totaling approximately 448,000 square feet of PDR space. The project site is relatively flat and rectangular. As shown in Figures 2 and 3 (pp. 4 and 5), the project site is fully developed and is covered in impermeable surfaces and has no existing landscaping.

The project site is bounded by Kirkwood Avenue to the north, Rankin Street to the east, McKinnon Avenue to the south, and Toland Street to the west. An elevated portion of Interstate 280 (I-280) bisects the project site, running in a north-south direction above the existing Selby Street right-of-way; the uppermost roadbed deck is approximately 55 feet above grade. Portions of the rights-of-way of the surrounding streets and Selby Street are included in the current lot configuration.

### *Existing Land Uses*

#### *Project Site*

The project setting sections of the initial study and technical studies reflect conditions at the project site when the environmental evaluation process began in 2017. As of August 2020, the project sponsor submitted building permit applications for an interim use on the project site.[6] The interim use is a parcel delivery service use, focusing on last-mile e-commerce delivery, and occupies one half of the site (the two buildings west of I-280). One of the two buildings is used for vehicle staging and the other is used for warehousing of goods and loading of delivery vehicles. This use is temporary in nature and would ultimately be replaced by the proposed project, if it were to be approved. The environmental analysis of the initial study and technical sections analyze the changes between the proposed project and the uses at the project site prior to the operation of the interim use, resulting in a more conservative analysis.[7]

Table 1 (p. 6) lists uses that existed at the project site in 2017. As previously described, these uses included automotive storage, fleet management, general storage, food-related storage, temporary storage, and vacant spaces. The existing buildings are constructed of metal siding over a wood column and truss structure. An aerial California Department of Transportation (Caltrans) easement for I-280 is adjacent to both lots; the existing easement would be maintained.

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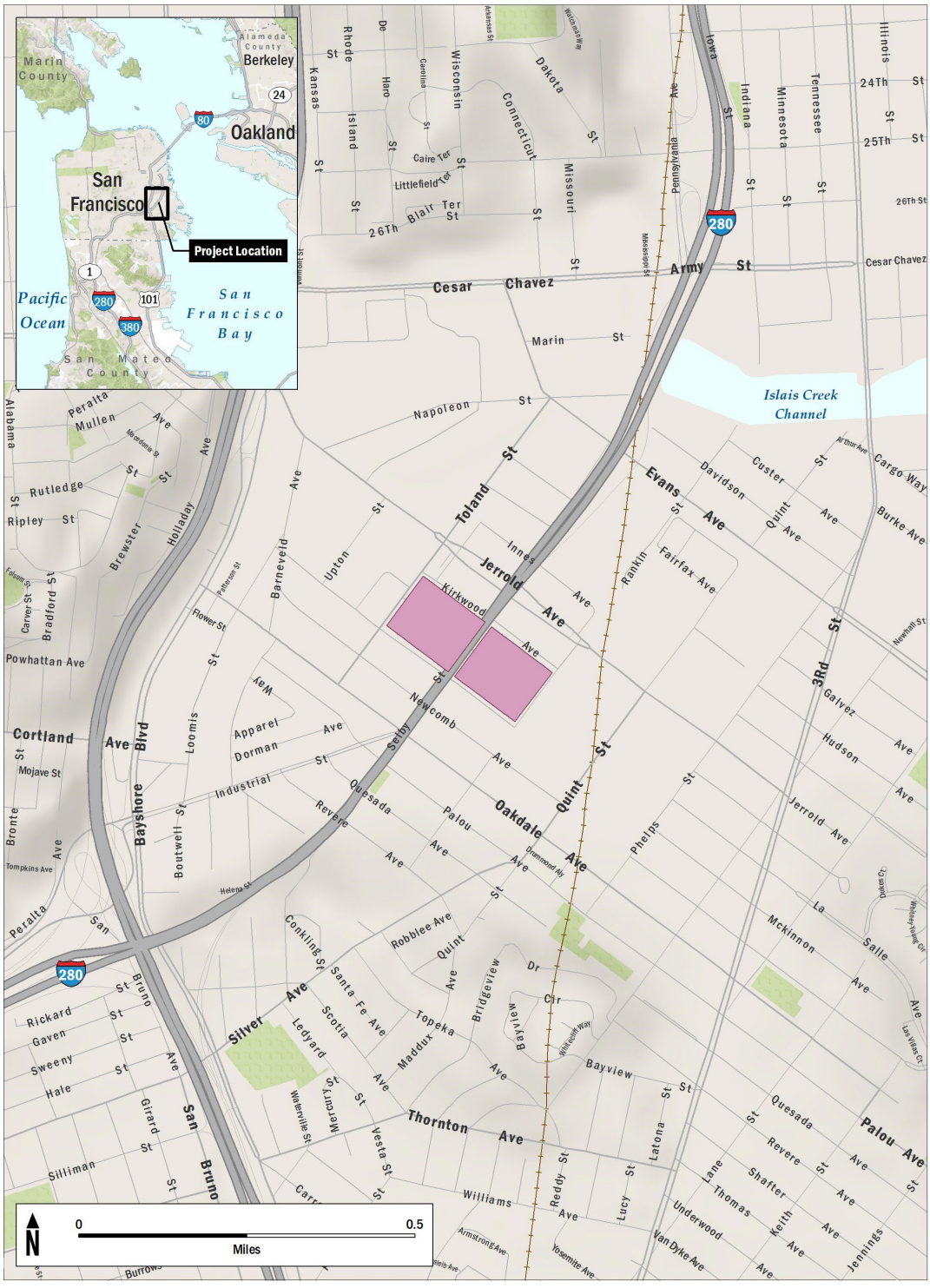
[6] San Francisco Building Department Permit #202008272769 (Building 417 shell) and San Francisco Building Department #202008272770 (Building 418 shell).

[7] Analyzing the change in the environment from the uses that occupied the site in 2017 to the proposed use is considered conservative, or worst-case, because the interim use is more intensive than the uses that existed on site in 2017.

**Figure 1** **Project Location**




Source: AECOM 2021

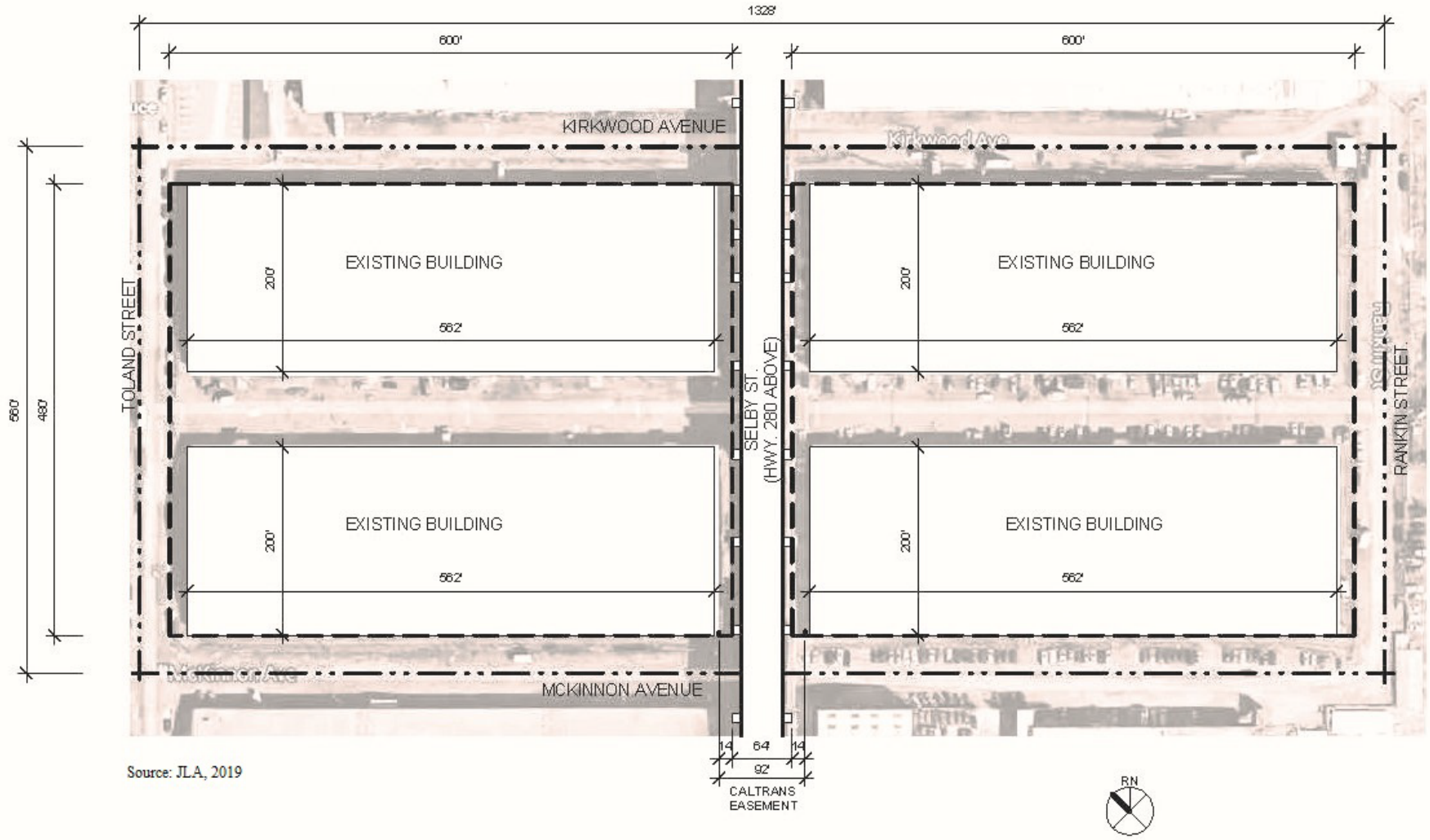
**Figure 2** **Aerial View of Project Vicinity**


**Legend**

Project Site:
749 Toland Street and 2000 McKinnon Avenue

Source: JLA, 2017

**Figure 3** **Existing Site Plan**




Source: JLA, 2019

**Table 1 Existing Uses at the Project Site**

| Use | Area (square feet)[1] |
|---|---|
| Automotive storage and fleet management | 141,400 |
| General storage (for contractors, supply companies, etc.) | 184,400 |
| Food-related storage and wholesale (multiple tenants) | 77,100 |
| Temporary storage | 35,700 |
| Vacant | 9,400 |
| **Total** | **448,000** |

Source: Prologis, Inc., 2019

[1] These areas are approximations of uses that existed at the project site in December 2017.

The project site is developed and is currently covered by buildings or paved and gravel surfaces. There are no sidewalks surrounding the project site and the site does not contain any *curb cuts*, but vehicle access is designated at four access points. The entire site is fenced in and level with the surrounding road base. Additionally, the project site does not contain any street trees, only a small amount of vegetation and no open space.

The surrounding uses in the project vicinity include predominantly PDR and light industrial uses. The San Francisco Wholesale Produce Market (SF Market) is adjacent to the project site to the north along Kirkwood Avenue; wholesale flooring, art supply, and shipping services are located in the vicinity; and taxicab companies are northwest of the site along Toland Street. A warehouse space for crafts and art supplies, a door supplier, a pet supply store, a van storage company, and several fleet management uses are located south of the project site along McKinnon Avenue. San Francisco Public Utilities Commission (SFPUC) offices and the SF Market are located along Rankin Street east of the project site.

## Land Use and Zoning

The project site is in the PDR-2 zoning district within the Bayview Hunters Point Area Plan. San Francisco Planning Code (planning code) section 210.3 states that the intent of the PDR-2 zoning district is to "encourage the introduction, intensification, and protection of a wide range of light and contemporary industrial activities," including industrial activities in enclosed structures, in partially enclosed structures, and in open areas that "may require trucking activities multiple times per day, including trucks with up to 18 wheels or more, and occurring at any time of the day or night."

The project site is in the 65-J height and bulk district (65 feet maximum height). The permitted floor area ratio[8] in the PDR-2 zone is 5:1. The existing floor area ratio of the project site is approximately 0.8:1 and the proposed floor area ratio for the site would be approximately 2.9:1. Because the proposed buildings would be taller than 65 feet, approval of a height and bulk district map amendment would be required for the proposed project. The proposed project would seek a new special use district designation to allow proposed modifications to the existing PDR-2 zoning.

[8] "Floor area ratio" is the gross floor area of a building or buildings on a zoning plot, divided by the area of the zoning plot. The floor area ratio is calculated to assist in determining whether the mass and scale of a project is compatible with the surrounding neighborhood. For the purpose of this calculation, rights-of-way have not been included in the total gross site area, and the open roof area has not been included in the gross floor area of the building.

## Existing Parking, Circulation, and Loading

The project site currently has two approximately 600-foot-long by 80-foot-wide areas that are used for a truck court and parking. Adjacent to the project site, two sections of Toland Street and two sections of Rankin Street, each approximately 200 feet long, are nonstriped and do not have signed parking areas. These areas are presumed to be parallel on-street parking spaces. Adjacent to the site, two sections of Kirkwood Avenue and one section of McKinnon Avenue, each approximately 600 feet long, are also nonstriped and do not have signed parking areas and are presumed to be parallel on-street parking spaces. Total on-street parking capacity along the project site perimeter is estimated to be approximately 250 to 310 standard vehicles (approximately 50,000 square feet).[9]

The project site is served by one San Francisco Municipal Railway (Muni) light rail line (approximately four blocks to the east) and four bus lines. Transit stops in the project vicinity include stops for Muni bus lines 23-Monterey, 24-Divisadero, and 9-San Bruno, and San Mateo County Transit District bus line 292. The 23-Monterey Muni line operates immediately adjacent to the project site, with the closest stop at the corner of Toland Street and Oakdale Avenue, and the other bus lines operate within approximately four blocks of the site.[10] The proposed project would not directly affect any of these bus lines. The Third Street light rail line lies approximately 2,000 feet east of the project site; the closest stops are Kirkwood/La Salle, Hudson/Innes, and Oakdale/Palou. The closest Bay Area Rapid Transit (BART) station is the 24th Street Mission Station, approximately 1.5 miles to the northwest. The Glen Park BART Station is approximately 2.5 miles to the southwest. The 22nd Street Caltrain Station is located approximately 1.5 miles to the northeast.

I-280 and United States Highway 101 (U.S. 101) are the major regional roadways that serve the project site (Figure 4 on p. 8). Access to the project site is predominantly from Toland Street, from either the north or south. Toland Street provides connections to both Evans and Jerrold avenues north of the project site and to Oakdale Avenue south of the site. These three main east-west connecting streets provide further connections to key city streets and to the highway interchanges of U.S. 101 and I-280, both north and south of the project site.

Many occupants of the existing buildings use portions of the surrounding streets for both parking and movement of vehicles. The existing truck court and parking area serve as the primary vehicular staging area. This area provides space for loading and parking, both of which are organized in an informal manner. Additionally, Selby Street (below I-280) provides mid-site connectivity under the overpass.

Pedestrians use the surrounding streets and the truck court to access specific tenants of the current buildings. Bicycle circulation uses the same facilities as pedestrians and other vehicles.

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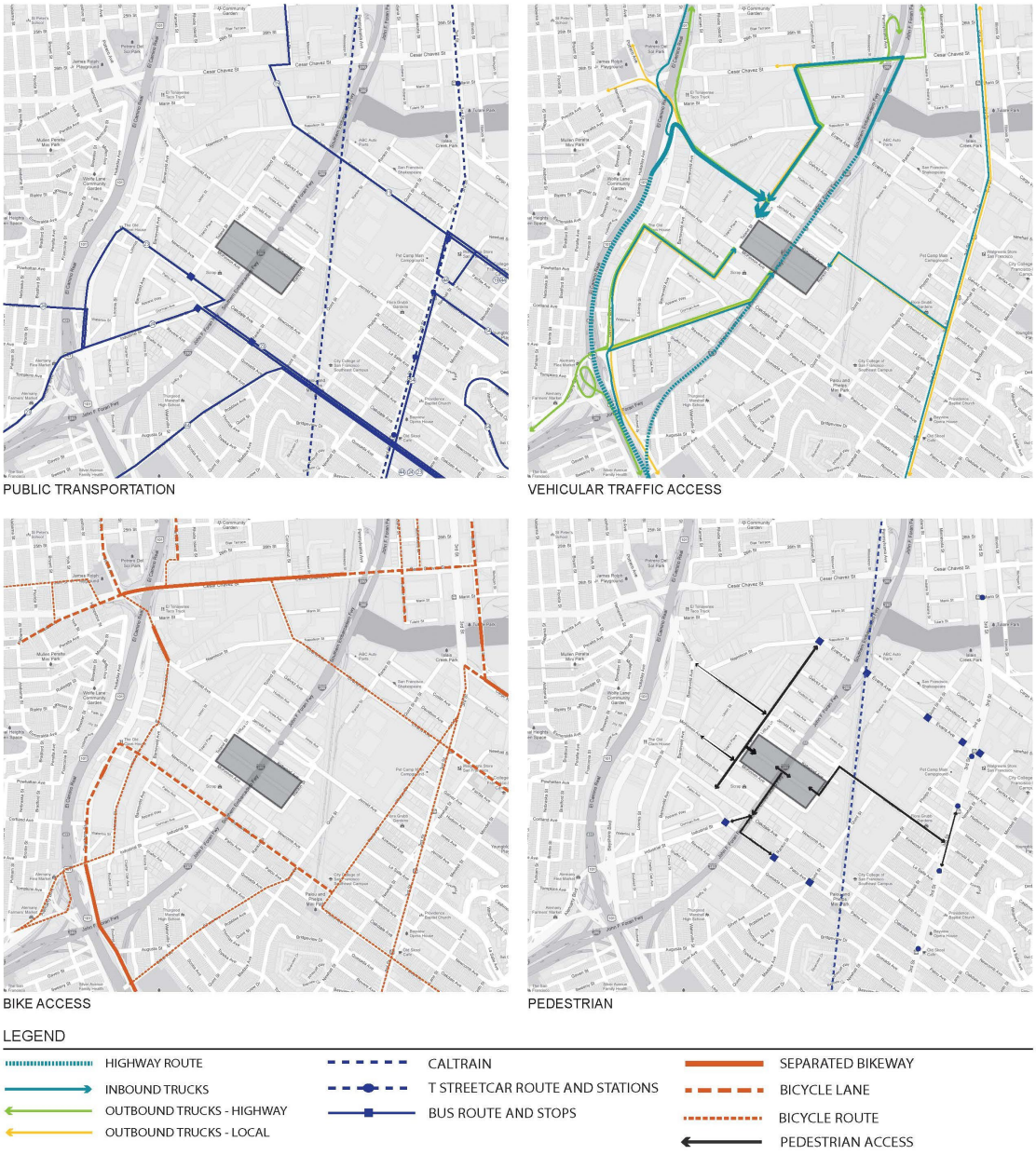
9 There are currently no posted limitations to street parking along the project site perimeter.

10 As part of the Palou Avenue Streetscape Improvement Project, the 23-Monterey Muni line was rerouted three blocks south, from Jerrold Avenue to Palou Avenue. Construction of this project was completed in spring 2020. See *https://www.sfpublicworks.org/sites/default/files/Palou%20Avenue%20factsheet.pdf*.

## Figure 4 Existing Access




Source: JLA, 2021

Pedestrian circulation offsite is fairly limited. Bicycle circulation is also limited; the closest formal *class III bicycle lane*[11] is located on Evans Avenue, five blocks to the north, and the closest *class II bicycle lane*[12] is on Oakdale Avenue, two blocks to the south. Connections to these two sets of bike lanes are provided via Toland Street.

## Proposed Project

The proposed project would construct two new multi-story PDR buildings that would provide new PDR space in the industrial area of the Bayview neighborhood of San Francisco. The proposed PDR uses are explained further in the Proposed Project Uses section (p. 20).

The proposed project would demolish the existing four single-story PDR buildings onsite and would construct two new three-story buildings (with active roof), totaling approximately 2,160,000 gross square feet. Each building would have a maximum height of approximately 97 feet (115 feet with rooftop appurtenances included).[13] As depicted in Figure 5 (p. 10), the proposed building west of I-280 at 749 Toland Street is "building A" and the proposed building east of I-280 at 2000 McKinnon Street is "building B." As shown in Figure 5 (p. 10), buildings A and B would be approximately the same size, shape, and dimensions, and would be oriented similarly onsite. Each of these two buildings would include a one-way ramp system designed to provide full-service, upper-level truck access, and PDR spaces for its tenants.

Both building A and building B would include three levels of PDR space with direct access to vehicle circulation, logistics yards, and rooftop parking, vehicle staging, and storage. In addition, 8,400 gross square feet of ground floor retail space and 35,000 gross square feet of ground-floor maker space[14] would be included in the two buildings. The active roof would be a screened, open air, multi-purpose deck that could be used for materials staging and vehicle staging for box trucks, vans, and personal vehicles. Solar panels would be installed above the parking areas on the roof. Figures 6 through 12 (pp. 11 through 17) provide additional information and a visual representation of the typical building levels. Specifically, floor plans for the proposed project are provided in Figures 7, 9, and 11 (pp. 12, 14, and 16). Table 2 (p. 18) lists the proposed project's characteristics.

The buildings are intended to accommodate a variety of users including any combination of the uses below. It is anticipated that the assortment of PDR tenants would change over time. This initial study describes the project sponsor's preferred mix of PDR uses for the proposed project. Table 3 (p. 19) outlines the proposed project's preferred use mix.

As described above, the project site does not have any existing sidewalks or curb cuts. The proposed project would construct new 10-foot-wide sidewalks along the site's perimeter including Selby Street and would create seven new curb cuts for access to each new building. The new sidewalks would be designed in accordance with San Francisco's Better Streets Plan standards for industrial roads.

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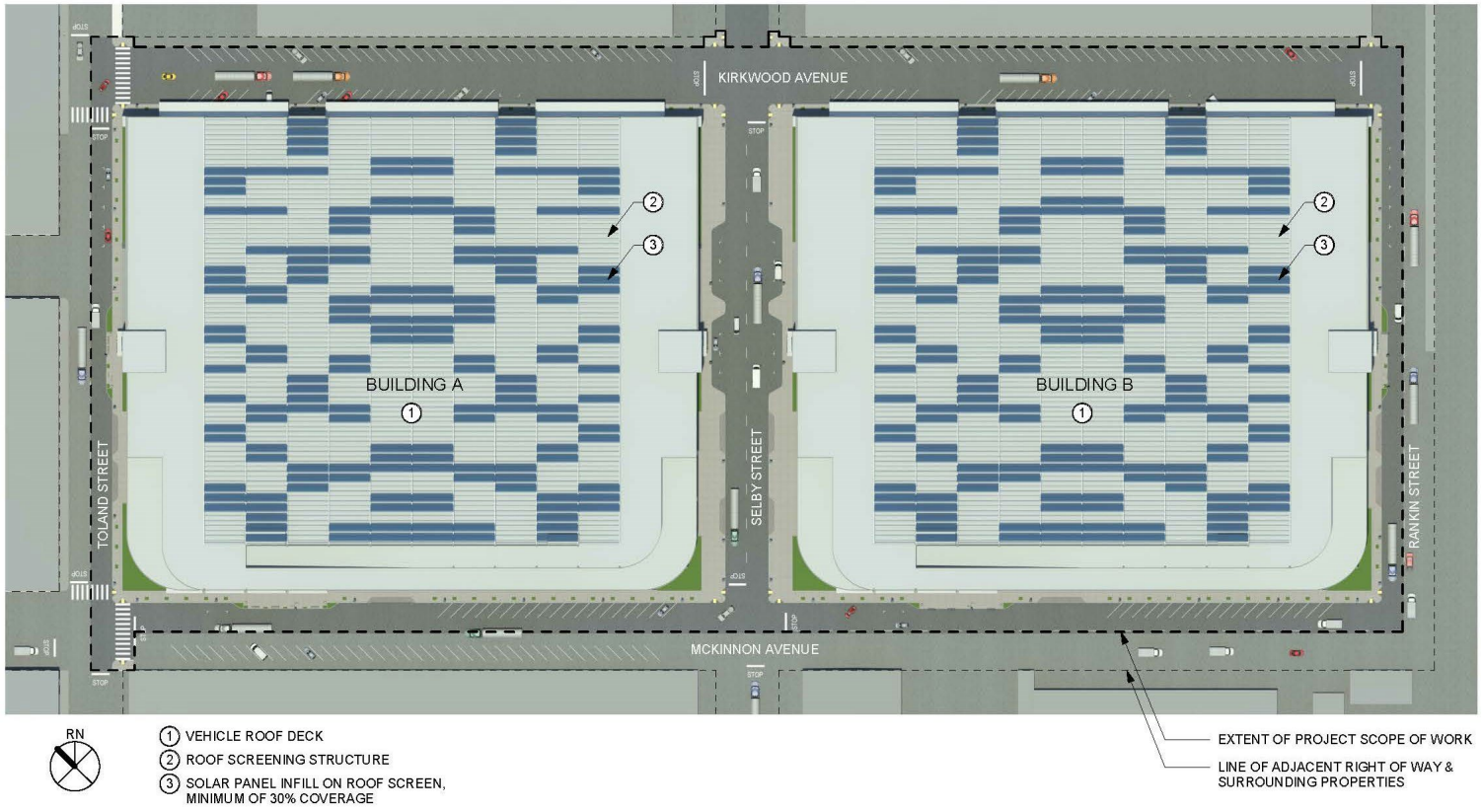
11 Class III bicycle lanes are signed bicycle routes that allow bicycles to share the travel lane with vehicles.

12 Class II bicycle lanes are bicycle lanes striped within the paved areas of roadways and established for the preferential use of bicycles.

13 Pursuant to section 260(b)(1)(B) of the planning code, the mechanical and elevator penthouses are exempt from the planning code's height limits. However, these features are considered in the context of environmental review.

14 In the preferred use mix, all of the maker and manufacturing space would be on the ground floor (i.e., level 1). However, this use could also be on levels 2 and 3 in the future.

**Figure 5** **Site Plan for the Proposed Project**

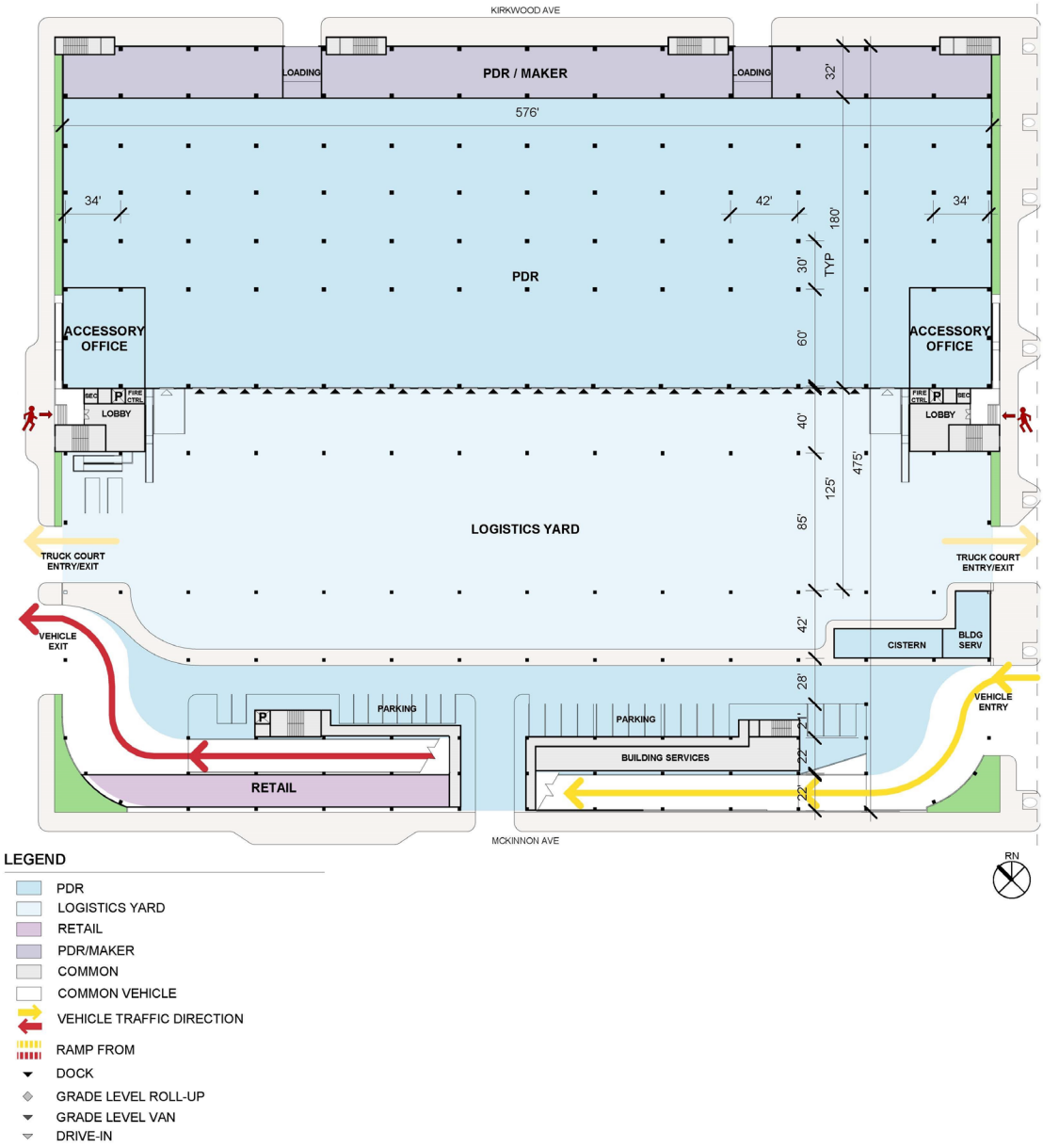



Source: JLA, 2021

**Figure 6** **Proposed Project – Three Dimensional Illustration of Proposed Project (from Toland Street and McKinnon Avenue Looking East)**

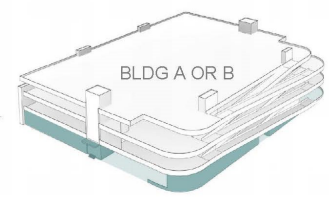

Source: JLA, 2021

## Figure 7 Proposed Project Floor Plan – Level 1 (Buildings A and B)

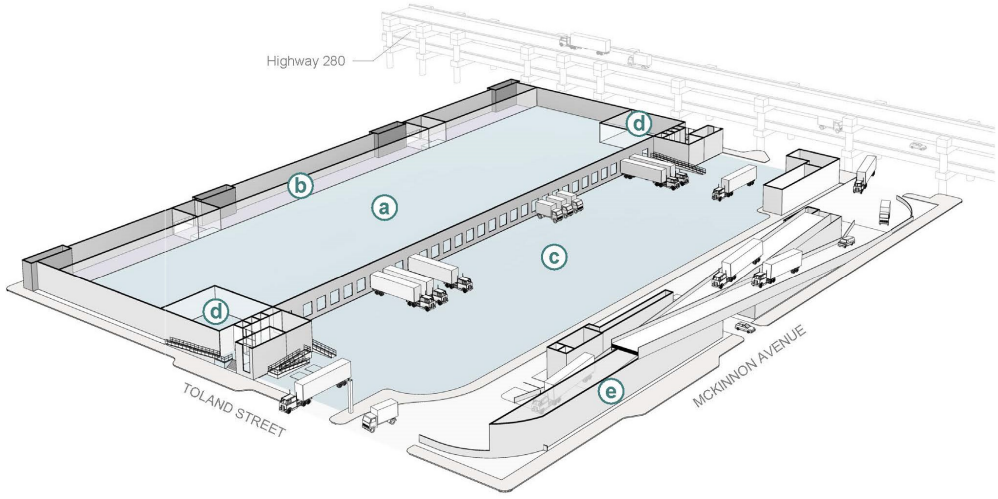



Source: JLA, 2021

## Figure 8 Level 1 Description (Buildings A and B)




*This level features traditional dock-high warehouse space to serve a variety of PDR uses and street-oriented maker and retail spaces to animate the surrounding streetscape. Separate ramp access to and from the upper levels provides direct unencumbered access to bring vehicles into the project staging areas.*




**a PDR**
Dock-high space. 180' deep with a 24' clear height.

**b PDR/Maker Space**

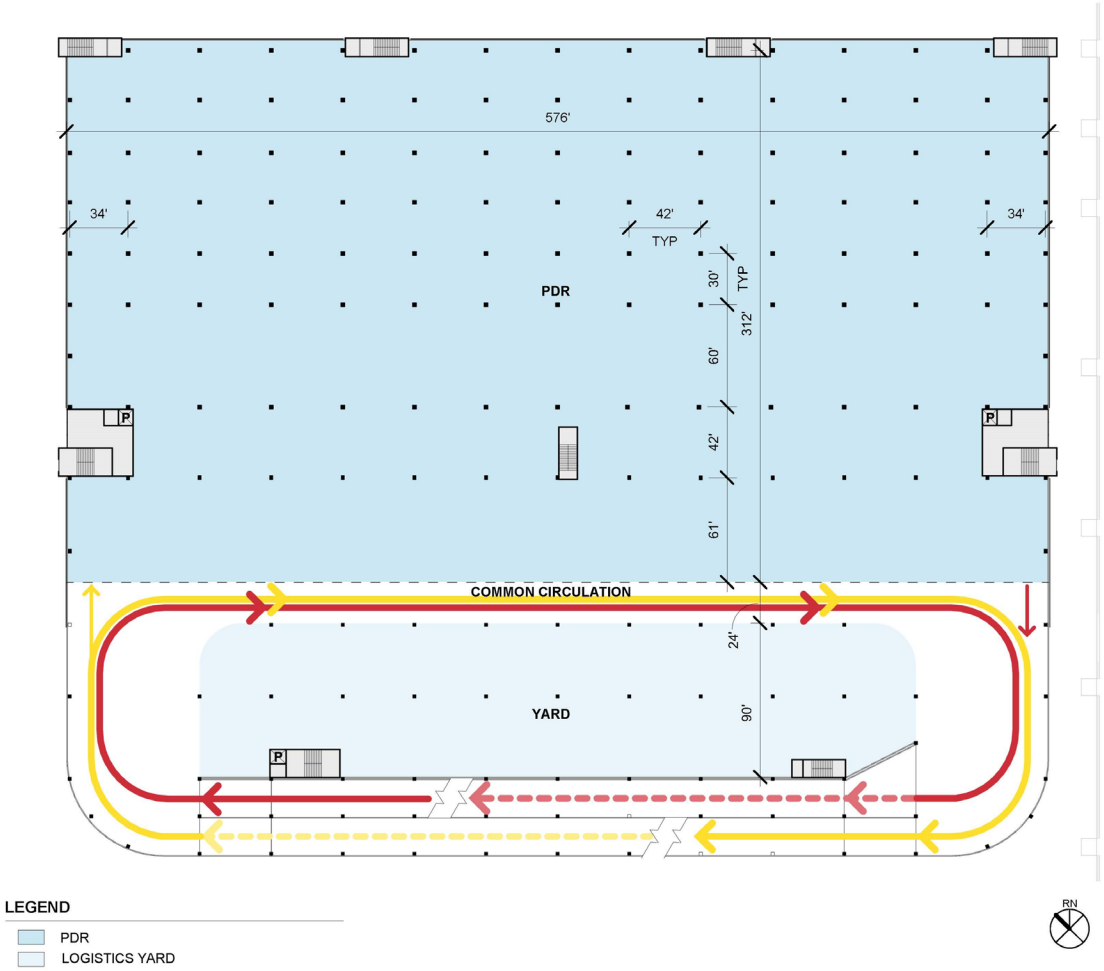
**c Logistics Yard**
An ample yard provides room for vehicle staging and space for flexible logistics support activities including fleet staging, storage, and goods transfer.

**d Accessory Office**
Flexible space to support PDR operations.

**e Retail**
Provide amenities (eg. cafe).

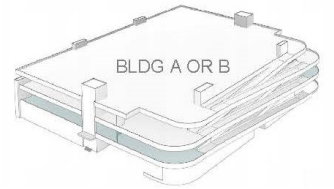
Source: JLA, 2021

**Figure 9** **Proposed Project Floor Plan – Levels 2 and 3 (Buildings A and B)**

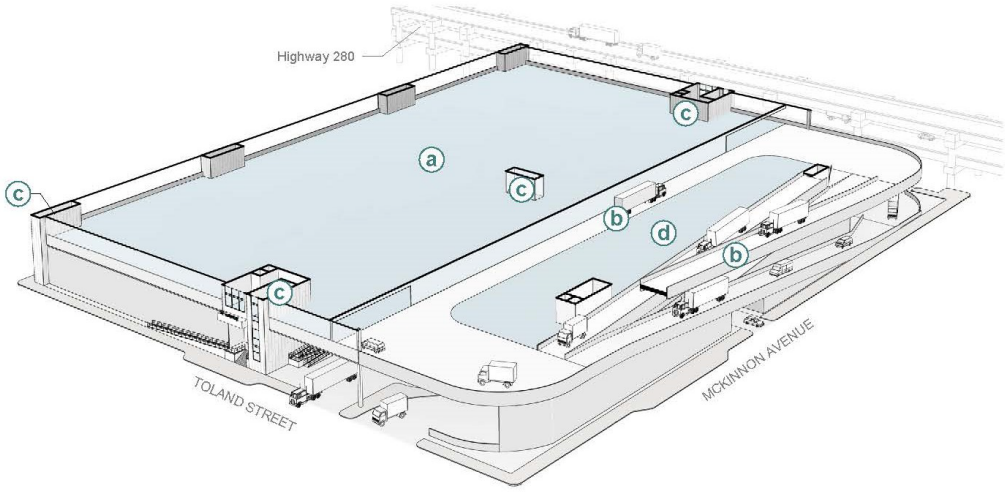



Source: JLA, 2021

## Figure 10 Levels 2 and 3 Description (Buildings A and B)




*This level features multi-functional space which supports a wide variety of PDR type users. This level is served by a ramp that accommodates vehicles up to the San Francisco legal limit, including trucks, buses and smaller vehicles.*




**a PDR**
22'-24' high clear space at this level.

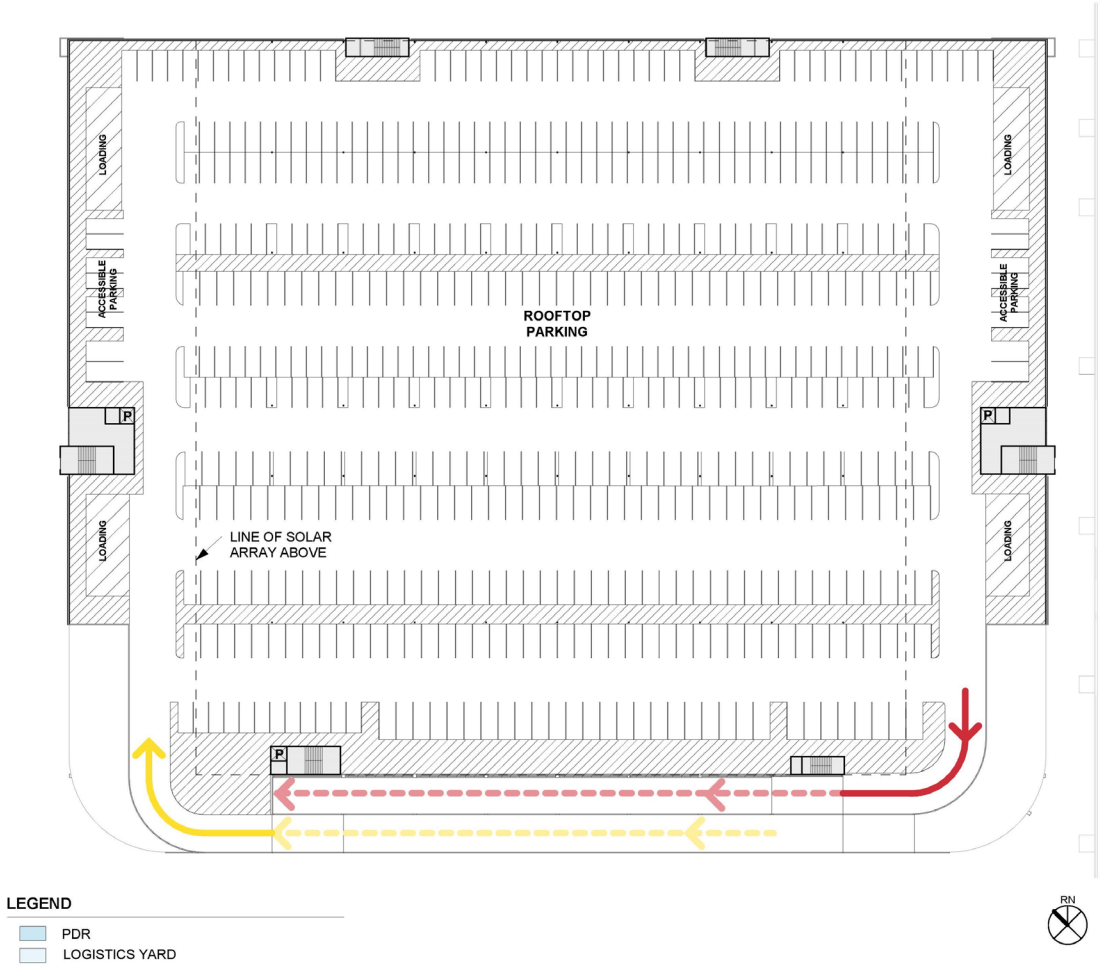
**b Common Vehicle Circulation**
Scissor ramp and bypass lane provide one-way circulation up and down throughout building.

**c Elevators & Stairs**
Common circulation cores connect all levels.

**d Logistics Yard**
Provides space for flexible logistics support activities including fleet staging, storage and goods transfer.

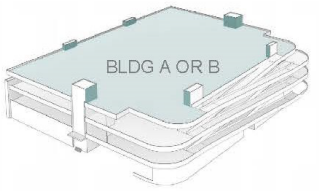
Source: JLA, 2021

**Figure 11 Proposed Project Roof Plan – Level 4 (Buildings A and B)**

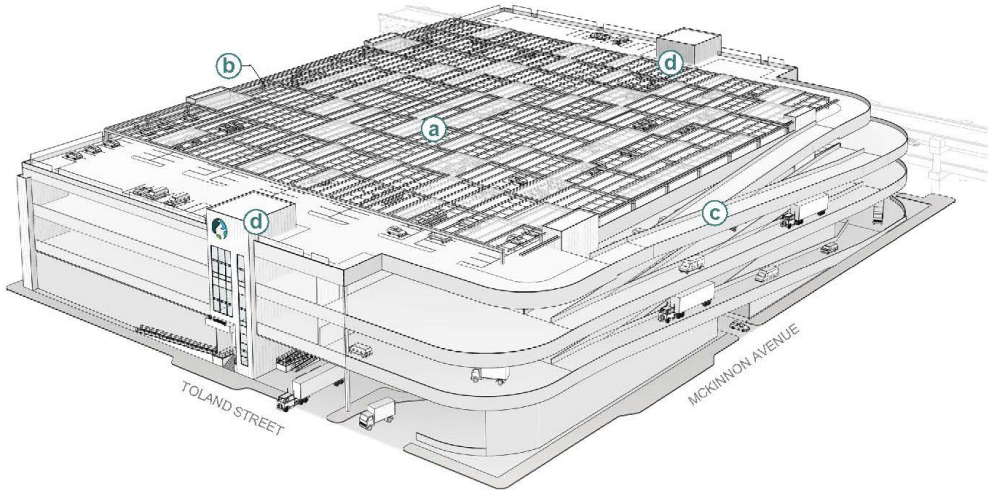



Source: JLA, 2021

## Figure 12 Level 4 Roof Description (Buildings A and B)




*This level features a screened, open air, multi-purpose deck that can be used for materials staging, vehicle staging for box trucks, vans, and personal vehicles. Additional screening is provided by a solar array. Ramps provide access to this level for vehicles as large as a 24' box truck.*




**a Vehicle Deck**
Layout for staging box trucks and vans, and accessory automobile parking.

**b Solar Array**
Roof is screened by a solar array, which will generate electricity for vehicle charging.

**c Ramps up to Roof**
Scissor ramp provides one-way traffic access to and from roof.

**d Elevators & Stairs**
Provide common circulation to all levels.

Source: JLA, 2021

## Table 2 Project Characteristics

| | Building A | Building B | Project Total |
|---|---|---|---|
| **Site Characteristics** | | | |
| Gross Site Area[1] | 371,900 square feet (8.55 acres) | 371,900 square feet (8.55 acres) | 743,800 square feet (17.1 acres) |
| Length | 560 feet by 660 feet | 560 feet by 660 feet | Each lot: 560 feet by 660 feet |
| **Building Characteristics** | | | |
| Number of Buildings | 1 | 1 | 2 |
| Stories (including active roof)[2] | 4 | 4 | 4 |
| Height | 97 feet (115 feet maximum including rooftop appurtenances) | | |
| Use | PDR (and other permitted) Uses | | |
| **Proposed Building** | **Area (gross square feet)** | **Area (gross square feet)** | **Area (gross square feet)** |
| PDR (and other permitted) Uses | 583,400 | 583,400 | 1,166,800 |
| PDR Support Spaces | | | |
| Logistics Yard | 72,900 | 72,900 | 145,800 |
| Vehicle Circulation | 119,800 | 119,800 | 239,600 |
| Parking[3] | 299,700 | 299,700 | 599,400 |
| Retail | 4,200 | 4,200 | 8,400 |
| **Total** | **1,080,000** | **1,080,000** | **2,160,000** |
| Vehicle Parking Spaces | 583 | 583 | 1,166 |
| Vehicle Loading Spaces | 36 | 36 | 72 |
| Bicycle Parking Spaces[4] | 56 | 56 | 112 |

Source: Prologis, Inc. 2020

Notes:

PDR = production, distribution, and repair

1. Total gross site area includes portions of the rights-of-way of the surrounding streets and Selby Street.
2. Fourth story consists of elevator and stair access structures which provide access to active roof.
3. Parking area includes 55,900 sf/building on the ground level and 243,800 sf/building on the roof level.
4. Bicycle parking: 100 *class I bicycle parking* spaces and 12 *class II bicycle parking* spaces. Class I bicycle parking spaces are spaces are in secure, weather-protected facilities intended for use as long-term, overnight, and workday bicycle storage by dwelling unit residents, nonresidential occupants, and employees. Class II bicycle parking spaces are bike racks in publicly accessible, highly visible locations and are intended for transient or short-term use by visitors, guests, and patrons to the building or use. Class II bike racks allow the bicycle frame and one wheel to be locked to the rack (with one U-shaped lock) and provide support to bicycles without damage to the wheels, frame, or components (planning code section 155.1).

No public open space is required or proposed for the project.

All numbers are rounded approximations.

## Table 3 Preferred Project Use Mix

| Uses below are a combination of areas in buildings A and B | | | | | |
|---|---|---|---|---|---|
| **Uses** | **Level 1** | **Level 2** | **Level 3** | **Roof** | **Project Total** |
| PDR Uses | | | | | |
| Light Manufacturing/Maker | 35,000 | 0 | 0 | 0 | 35,000 |
| Parcel Delivery/Last Mile | 0 | 381,000 | 369,600 | 8,800 | 759,400 |
| Wholesale and Storage | 372,400 | 0 | 0 | 0 | 372,400 |
| Fleet Management[1] | 0 | 0 | 0 | 0 | 0 |
| PDR Support Spaces | | | | | |
| Logistics Yard | 0 | 72,400 | 73,400 | 0 | 145,800 |
| Vehicle Circulation | 13,800 | 112,800 | 95,400 | 17,600 | 239,600 |
| Parking | 111,800 | 0 | 0 | 487,600 | 599,400 |
| Laboratory[2] | 0 | 0 | 0 | 0 | 0 |
| Retail | 8,400 | 0 | 0 | 0 | 8,400 |
| **Total** | | | | | **2,160,000** |

Source: Prologis, Inc. 2019

1. Fleet management is not a component of the preferred project land use for the purpose of this environmental analysis. This is because the manufacturer and maker, parcel delivery and last mile, and the wholesale and storage uses would result in higher vehicle trip rates (and corresponding noise and air quality impacts associated with vehicle trips) compared to fleet management uses. However, should the project sponsor elect to have a fleet management component as part of the project in the future, the environmental analysis would have adequately evaluated the transportation (and related air quality and noise) impacts from this use.
2. Laboratory is not a component of the preferred project land use for the purpose of this environmental analysis. However, PDR-2 zoning districts do allow for specific laboratory uses.

PDR = production, distribution, and repair

## Proposed Project Uses

The proposed project includes PDR (and other permitted uses in the PDR-2 zoning district) and retail uses as further described below.

### *Production, Distribution, and Repair Uses*

Although tenants have not been selected yet, the project sponsor has identified four major types of PDR uses that could occur onsite under the proposed project:

1. manufacturing and maker space;
2. parcel delivery, including last-mile delivery;
3. wholesale and storage; and
4. fleet management.

The text below defines these uses and provides examples of each. Figure 13 (p. 21) presents a use matrix to further describe the proposed PDR and related uses for the proposed project. For all PDR uses, the building would be accessible to users 24 hours per day.

### *Manufacturing and Maker Space*

This use is defined as a light industrial use that provides for the fabrication or production of goods, by hand or machinery, for distribution to retailers, wholesalers, or the public. Makers are often characterized by their production and custom activities that usually involve individual or special design, handiwork, and/or design-related innovation and experimentation. Examples of this light industrial use include food and beverage processing, apparel and other garment products, furniture and fixtures, printing (including three-dimensional printing), prototyping, and publishing. Manufacturing and maker space tenants would require approximately 2,000 to 20,000 square feet of space per occupant, depending on the needs and size of the company. Accessory retail may be associated with this use. Receiving and shipping vehicles for this use type can range from personal vehicles to pickup trucks/box trucks/vans/cutaway buses to semitrucks (74-foot maximum length). Primary working hours would vary by tenant. Heating, ventilation, and air conditioning (HVAC) and venting requirements would also vary by tenant and would be negotiated with the project sponsor before execution of any lease agreements, as discussed in the Project Sponsor's Tenant Screening Process section (p. 25). The operating hours when most activities occur would vary but would typically be from 4 a.m. to 6 p.m. and would ultimately depend on the tenant.

### *Parcel Delivery and Last-Mile Delivery*

This use is defined as a nonretail automotive use limited to facilities for the unloading, sorting, and reloading of merchandise for deliveries. This use includes both staging of delivery trucks and vans, and the use of small-scale, personal-type vehicles for last-mile deliveries. Examples of regional delivery services include UPS, FedEx, and OnTrac. Last-mile delivery services include services such as Amazon Prime, Google Express, and Good Eggs. Parcel delivery and last-mile delivery tenants would require more space for their operations than maker and manufacturing tenants, at approximately 20,000 to 400,000-plus square feet per occupant. No accessory retail would be necessary for this use. Receiving and shipping vehicles for this use type can range from personal vehicles to pickup trucks/box trucks/vans/cutaway buses to semitrucks (74-foot maximum length). HVAC would be required only for accessory office space, active vehicle areas would be ventilated, and other specialized ventilation equipment would not be required. Primary operating hours would typically be from 4 a.m. to 6 p.m., but would ultimately depend on the tenant.

**Figure 13** **Production, Distribution, Repair, and Related Uses**

| | USE TYPES | A MAKER + MANUFACTURING | | | B LABORATORY | C PARCEL DELIVERY | | D WHOLESALE + STORAGE | | | E PRIVATE RETAIL VEHICLE STAGING + MAINTENANCE | | F PRIVATE FLEET STORAGE, STAGING + MAINTENANCE | G PUBLIC FLEET STAGING + MAINTENANCE |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| OVERVIEW | description | A light industrial use that provides for the fabrication or production of goods, by hand or machinery, for distribution to retailers, wholesalers, or public | | | A non-retail use centered around scientific research & innovation | Light industrial use typified by activities relating to the unloading, sorting, and reloading of merchandise for deliveries | | A use typified by activities relating to providing goods or commodities for resale or business use, including both the storage and sales areas necessary for these types of businesses. | | | Storage of vehicles to be sold/rented and light maintenance for private vehicles that are operated by a single entity | | Storage and potential light maintenance for shuttles servicing specific institutions, businesses, and/or independent shuttle service businesses | Storage and maintenance for buses, trolleys, and/or shuttles for a public transportation agency |
| | probable tenant type | A1 PDR incubator, craft, small assembly | A2 food + beverage | A3 advanced manufacturing large assembly | B1 scientific testing + development lab | C1 parcel hub | C2 last mile | D1 construction supplies - wholesale | D2 food + beverage - wholesale & distribution | D3 freight forward + storage | E1 vehicle dealer | E2 vehicle rental agency | F1 private company fleet | G1 public fleet management |
| | business examples | *Bryr Clogs Rickshaw Bags* | *Recchiuti* | *PCH Lime Lab* | *Applied Materials* | *FedEx, On-Track, UPS* | *Amazon Prime, Good Eggs* | *Russel Sigler* | *Chef's Warehouse* | *Geodis* | *Royal Motors, SF Toyota* | *Uhaul, Hertz* | *Google, Academy of Art University, Lyft, Bauer, UCSF* | *Muni Buses, SF Paratransit* |
| FACILITY | typical area (sf) | 2,000-5,000 per maker within 20,000 incubator | 5,000 - 20,000 | | 10,000 - 40,000 | 20,000 - 200,000 | 40,000 - 400,000 | 20,000 - 100,000 | | | 35,000 - 100,000 | 35,000 - 100,000 | 30,000 - 100,000 | 400,000 - 1,200,000 |
| | clear height (ft) | 12' - 20' | | | 12' - 20' | 20' - 30' | | 24' - 30' | | | 10' - 14' | | 10' - 20' | 15' - 20' |
| OPERATIONS | employee ratio | 3 per 1000 sf | | | 5 per 1,000 sf | 1.5 per 1000 sf | | 0.7 per 1000 sf | 0.5 per 1000 sf | 0.7 per 1000 sf | 0.3 per 1000 sf | | 0.5 per 1000 sf | 0.7 per 1000 sf |
| | office ratio | 15 - 25% | | | 15 - 25% | 10 - 15% | | 5 - 10% | 10 - 25% | 5 -10% | 5 - 10% | | 5 - 10% | 10-15% |
| | typical normal hours | 6:00am - 6:00pm swing shift possible | 4:00am - 4:00pm swing shift possible | 8:00am - 6:00pm | 8:00am - 6:00pm | 4:00am - 4:00pm swing shift possible | | 6:00am - 4:00pm | 12:00am -4:00 pm | 6:00am - 6:00pm | 7:00am - 7:00pm | | 5:00am - 10:00pm | 5:00am - 12:00 midnight |
| | accessory retail | preferred | | possible | no | no | | no | | | no | | no | no |
| | venting required | code min + equipment needs | code min + vertical venting + hood exhaust | code min + equipment needs | code min + equipment needs | code min | | code min | code min + additional venting if processing | code min | code min + maintenance specific ventilation requirements | | code min + maintenance specific ventilation requirements | code req'd ventilation will vary per use requirements |
| | HVAC required | preferred, not required | climate controlled + hood exhaust + refrigeration | preferred, not required | required throughout | required in office only | | required in office only | climate controlled + hood exhaust + refrigeration | required in office only | required in office only | | required in office only | required in office only |
| TRANSPORTATION | recieving vehicle | personal vehicle/semi truck | | | box truck or van/semi truck | personal vehicle/box truck or van/semi truck | | semi truck | | | personal vehicle/box truck or van | | personal vehicle/box truck or van/bus | box truck or van/bus/articulated bus |
| | shipping vehicle | personal vehicle / semi truck | semi truck | | box truck or van/semi truck | personal vehicle/box truck or van | | box truck or van | | | - | - | - | - |
| | capacity | 1 : 1,500 | | | 1:1,000 | 1 : 1,500 | | 1 : 2,000 | 1 : 1,500 | 1 : 2,000 | 150 - 300 vehicles | 60 - 300 vehicles | 20 - 100 vehicles | 200 - 400 vehicles |
| | mainte-nance req'd | - | | | - | - | | - | | | light maintenance & employee support spaces required fuel & wash preferred | | light maintenance & employee support spaces required fuel & wash preferred | full maintenance & employee support spaces required fuel & wash required |
| | loading req'd | drive-in doors / dock high beneficial | | | drive to doors / freight elevator | dock high, internal vehicle access | | dock high roll up doors | | | - | | - | - |

Source: JLA, 2021

*(Intentionally blank for 11x17 insert)*

***Wholesale and Storage***

This use is characterized by activities that relate to providing goods or commodities for resale or business use and include both the storage and sales areas necessary for these types of businesses. The use also includes the storage (in an enclosed building) of goods without an associated wholesale or retail component. Examples include building material suppliers, food-related wholesale businesses, and import- or export-related storage. Wholesale and storage tenants would typically occupy a space of approximately 20,000 to 100,000 square feet per occupant. No accessory retail would be necessary for this use. This use typically requires a semitruck (74-foot-maximum length) for receiving materials and a pickup truck/box truck/van/cutaway bus for shipping goods. HVAC and venting requirements would vary by tenant and would be negotiated with the project sponsor before execution of any lease agreements, as discussed in the Project Sponsor's Tenant Screening Process section (p. 25). The operating hours would typically be from 12 a.m. to 6 p.m., but could vary by each tenant type.

***Fleet Management***

This use would allow private and public fleets to be staged and maintained. Uses would range from private retail vehicle staging, to private fleet staging and maintenance, to public fleet staging and maintenance. Private retailers would store and maintain vehicles to be sold or rented. The private vehicles would be mostly parked and the space would be used as storage; light maintenance and washing would be associated with this use. The tenant for this type of use would most likely be a vehicle dealership or vehicle rental agency, such as local retail car dealerships like U-Haul or Hertz. These tenants could require approximately 35,000 to 100,000 square feet per occupant and the spaces would typically hold 60 to 300 vehicles, depending on vehicle type and size. Operating hours when most activities occur would typically be from 5 a.m. to 12 a.m., but would ultimately depend on the occupant.

Private fleet staging and maintenance would involve storage and potential light maintenance of shuttles servicing specific institutions, businesses, and/or independent shuttle services. The tenant could include private company fleets; examples of this user type could include companies such as Google, Academy of Art University, Bauer, and the University of San Francisco or similar tenants. These tenants could require approximately 30,000 to 100,000 square feet per occupant to accommodate approximately 20 to 100 vehicles. No accessory retail would be necessary for this use. The operating hours when most activities occur would typically be from 5 a.m. to 10 p.m., but would ultimately depend on the occupant.

Public fleet staging and maintenance would include the storage and maintenance of buses, trolleys, and/or shuttles for a public transportation agency, such as the San Francisco Municipal Transportation Agency (SFMTA) or San Francisco Paratransit. These tenants would require approximately 400,000 to 1,200,000 square feet to accommodate 200 to 400 vehicles. No accessory retail would be necessary for this use. The operating hours when most activities occur would typically be from 5 a.m. to 12 a.m., but would ultimately depend on the occupant.

## Non-PDR Uses

In addition to these PDR uses, other types of uses permitted in the PDR-2 zoning district, such as laboratory (non-life sciences) and retail may occur in the proposed project. These uses are described below.

### *Laboratory*

Laboratory space that is suitable for scientific research (i.e., non-life science laboratory) would complement the manufacturing and maker space component by fostering an atmosphere conducive to innovation and experimentation. The proposed project could support laboratory uses focused on engineering, development, support, quality assurance, and quality control, which are principally permitted in the PDR-2 zoning district. The proposed project would not include chemical testing, or life sciences laboratory uses such as biological research or animal testing (which are not permitted in the PDR-2 zoning district). Laboratory tenants would require approximately 10,000 to 40,000 square feet of space per occupant, depending on the needs and size of the company. Receiving and shipping vehicles for this use type can range from pickup trucks/box trucks/vans/cutaway buses to semitrucks (74-foot maximum length). HVAC and venting would be required throughout the space and requirements would be negotiated with the project sponsor before execution of any lease agreements, as discussed in the Project Sponsor's Tenant Screening Process section (p. 25). Primary operating hours would typically be from 8 a.m. to 6 p.m., but would ultimately depend on the tenant.

### *Retail*

The proposed project would include approximately 4,200 gross square feet of ground floor retail space in each PDR building, resulting in a total of 8,400 gross square feet. The retail space would provide amenities and services to the employees at the project site and potentially workers in the surrounding area. Retail uses would include amenities such as a cafe, convenience store, or sandwich shop. Loading operations for the retail space would occur in the parking area on the ground floor. Primary hours would vary by tenant but would likely be 7 a.m. to 7 p.m.

## Peak Times of Daily Activity in the Proposed Project

An average of up to 1,980 employees would be onsite on a typical day. While different types of uses would have varying hours and peak periods, the combined uses by tenants in the buildings would result in two peak periods when the highest number of employees would be onsite at one time as compared to the rest of the day. These two peak periods would include the hours from 7 to 9 a.m. and from 4 to 6 p.m., with the evening peak being the highest.

## Mechanical Equipment

The proposed project would require a variety of mechanical system components that would perform specific functions. These systems would be designed to comply with the San Francisco Building Code and Leadership in Energy and Environmental Design (LEED) requirements. Mechanical ventilation in the vehicle circulation area (including ramps) and logistics yard would be provided as necessary to augment the natural ventilation of these unenclosed areas. Mechanical and natural ventilation would be provided to ventilate all enclosed storage areas. Buildings A and B would provide a base level of mechanical systems for each tenant; the project sponsor would facilitate the installation of additional systems as required to support specific tenant-related activities agreed upon during the leasing process. Many tenants for which the project is being designed are anticipated to require minimal additional mechanical systems.

Buildings A and B would each have one generator to accommodate the life safety needs of building users. The maximum capacity of each generator would be 400 kilovolt-ampere. Two additional 200-kilovolt-ampere generators per building would be used to serve the needs of future tenants.

HVAC would be provided for accessory office space and/or tenant spaces with specific process requirements. The accessory office space is limited to one-third or less of the PDR space, per section 204.3 of the planning code. Because of their size, the HVAC systems would likely be located inside the space to be conditioned and on the rooftop. Alternatively, some of the potential tenants would have specific HVAC requirements for their operations. Additional HVAC equipment for potential PDR uses could include mechanical ventilation for production hoods used during food and beverage production; HVAC equipment for laboratory spaces; refrigeration systems to support goods requiring storage at specific temperatures; and ventilation systems related to the production and/or repair of specific goods (e.g., woodworking, upholstery, furniture repair). For a detailed description of how the project sponsor would address tenant needs, see the Project Sponsor's Tenant Screening Process section below (p. 25).

## Key Operational Equipment

Many PDR uses depend on a variety of equipment associated with the movement of goods. Goods movement can occur either inside a specific user's space (e.g., between storage and fabrication areas) or within the PDR facility. Because of the size of many PDR facilities, these travel distances can be lengthy (over 500 feet) and can require connecting process-related space. Thus, much of the associated equipment is mechanized.

In addition to moving goods and supplies over long horizontal distances, many PDR businesses take advantage of cubic volume. This is accomplished using a combination of high-bay racking systems and the equipment necessary to lift goods to targeted heights. The specific high-bay racking system and the movement of equipment are based on the products being stored and moved on pallets or being palletized.[15]

## Project Sponsor's Tenant Screening Process

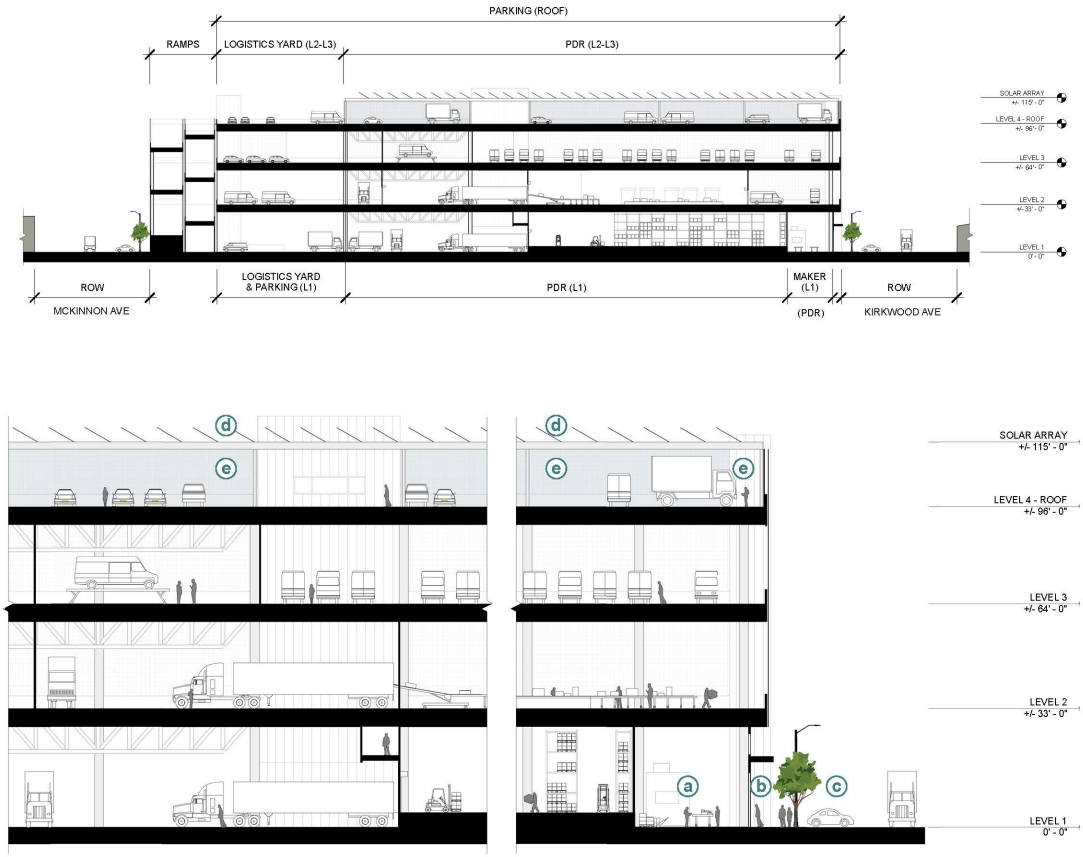
The project sponsor would regularly screen potential tenants to confirm that the potential tenants would fit within the context of the specific building or facility. This screening process would focus on an operations review followed by a business and financial review. The operations review would include an executive interview to determine the expected use, number of employees, parking and vehicle requirements, key operations requirements, equipment, hours of operation, and safety records and plans, as well as permits anticipated to be required from local, state, or federal agencies for operations (e.g., the Bay Area Air Quality Management District [air district]). Next, the project sponsor would tour the applicant's current locations to assess operations, the condition of the space and improvements, cleanliness, and equipment used, and to identify issues related to noise, odor, hazardous materials, or other operational issues. The project sponsor would determine whether the user is occupying other facilities and how the applicant has performed in other buildings. Finally, the project sponsor would review the published reputation of the applicant company and its operations.

## Section and Elevations

Sections and elevations are included on Figures 14 through 16 (pp. 26 through 28).

[15] To "palletize" means to place, stack, or transport (goods) on a pallet or pallets.

## Figure 14 Proposed Project – Building Sections




ⓐ Maker space

ⓑ Canopy and signage for Maker space

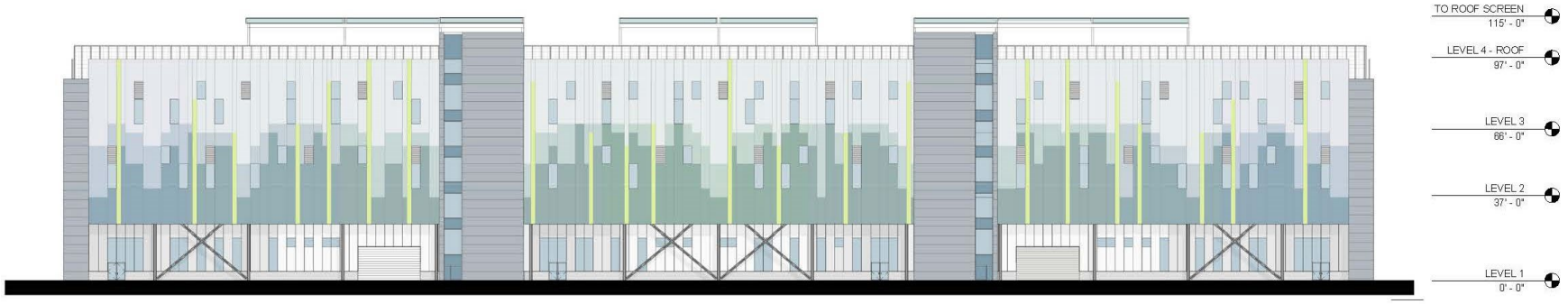
ⓒ Improved streetscape with 45° back-in parking

ⓓ Solar array to power building and fleet

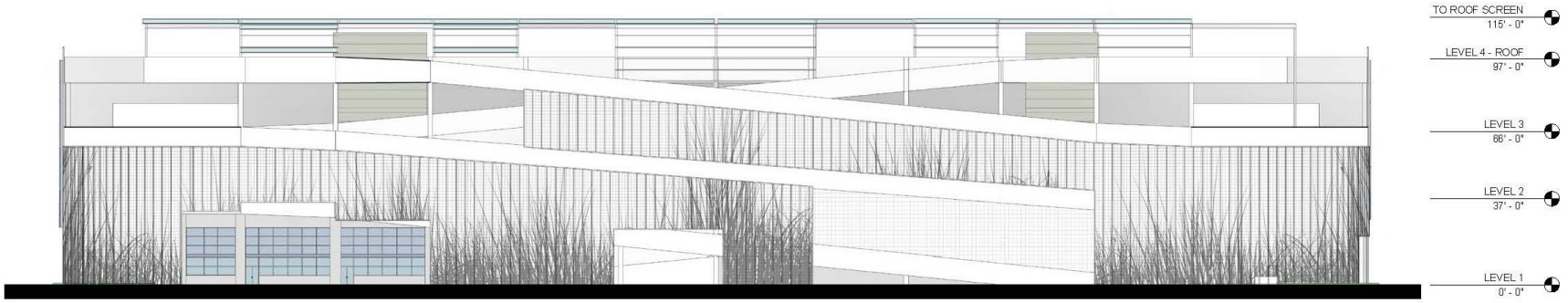
ⓔ Vertical screening element

Source: JLA, 2021

**Figure 15 Proposed Project – Elevations (North and South)**




Kirkwood Avenue Elevation *(single building, similar for both buildings )*




McKinnon Avenue Elevation *(single building, similar for both buildings )*

Source: JLA, 2021

**Figure 16 Proposed Project – Elevations (East and West)**


**Selby Street Elevation** *(similar for both buildings )*


**Toland Street Elevation** *(Rankin Street similar)*

Source: JLA, 2021

## Proposed Parking, Loading, and Circulation

### ON-STREET PARKING

The proposed streetscape improvements would provide 223 new striped parking spaces along the perimeter of the project site. The project would establish the following configurations for on-street parking:

- Striped parallel parking spaces on the eastern side of Toland Street, the eastern and western sides of Selby Street, and western side of Rankin Street, and
- Striped back-in, 45 degree parking spaces on the northern and southern sides of Kirkwood and McKinnon avenues.

### OFF-STREET PARKING AND LOADING

The proposed project would include approximately 599,400 gross square feet of parking. Seven new proposed curb cuts per building (14 total) along the project site's perimeter would allow ingress and egress to and from the buildings. Approximately 1,166 parking spaces for standard automobiles would be provided, and each building would include 36 loading dock doors at level 1 with additional tenant-specific loading on the upper levels.

### PROPOSED BICYCLE PARKING

The proposed project would provide 112 bicycle parking spaces in total: 100 class I and 12 class II spaces. The 100 class I bicycle parking spaces would be provided at ground level in buildings A and B, adjacent to the corner lobbies and retail areas of each building. Each building would provide approximately 50 class I spaces. The 12 class II bicycle parking spaces would be provided along the edges of the project site at pedestrian access points and near the building entrances, outside the corner lobbies and retail areas.

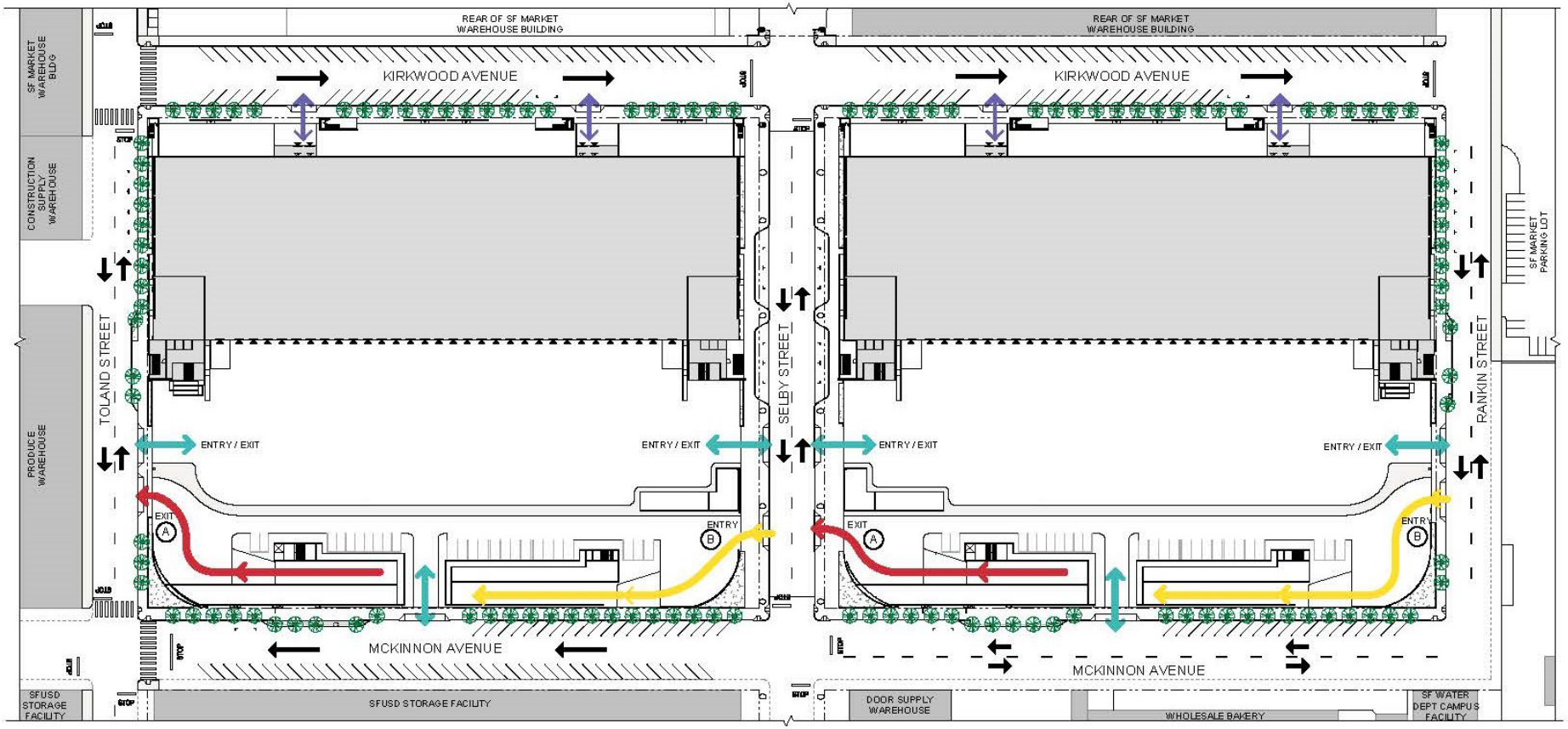
### PROPOSED VEHICULAR ACCESS AND CIRCULATION

Vehicular access to the project site and circulation around its perimeter would be altered from existing conditions. Existing access for vehicles, pedestrians, bicyclists and people on public transportation is shown in Figure 4 (p. 8). Figure 17 (p. 30) illustrates the proposed roadway modifications adjacent to the project site. Proposed vehicle access and circulation is shown in Figure 18 (p. 31).

The project proposes converting Kirkwood Avenue from a two-way street to a single-lane, eastbound, one-way street, and converting a portion of McKinnon Avenue (between Toland and Selby streets) from a two-way street to a single-lane, westbound, one-way street. As discussed below in Required Approvals (p. 40), modifications to the roadway directions and lane configurations on the streets surrounding the project site would require approval by the SFMTA. Large vehicles (such as tractor trailers) traveling to and from the upper levels of both buildings would be restricted to right turns only to enter and exit the buildings, resulting in a clockwise circulation pattern around both buildings.

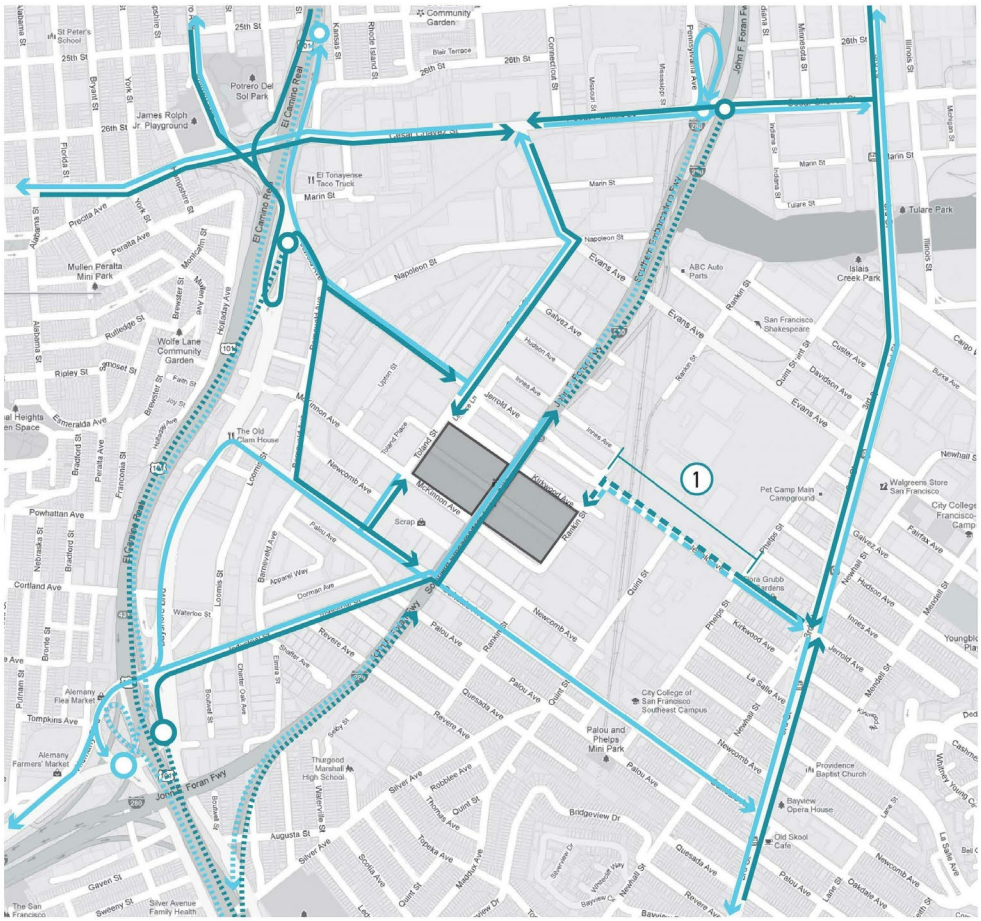
To access building A, vehicles traveling to the ground level would have two points of entry and exit; one on Toland Street and one on Selby Street. There would be no restrictions for vehicles entering and exiting the ground level (i.e., vehicles using these points of entry and exit could turn left or right). Vehicles traveling to the upper floors (via ramps) of building A would enter the site from Selby Street and exit at Toland Street. Although large trucks would be restricted to right-turn entry and exit, all smaller vehicle turning would be unrestricted.

**Figure 17 Proposed Roadway Modifications Surrounding the Project Site**




Source: JLA, 2021

## Figure 18 Proposed Vehicle Access and Circulation




1. Portion of Jerrold to be closed during PUC construction

Source: JLA, 2021

To access building B, vehicles traveling to the ground level would have two points of entry and exit; one on Rankin Street and one on Selby Street. There would be no turning restrictions for vehicles entering and exiting the ground level. Vehicles traveling to the upper floors (via ramps) of building B would enter the site from Rankin Street and exit at Selby Street. Although large trucks would be restricted to right-turn entry and exit, all smaller vehicle turning would be unrestricted.

#### PEDESTRIAN ACCESS AND CIRCULATION

Pedestrian access to and from the project site would be primarily along Toland and Rankin streets. Secondary points of pedestrian access would be provided along Selby Street (Figure 17, p. 30).

Pedestrians walking around the project site would use the new sidewalks and specific pedestrian-designated walkways. The project proposes continuous sidewalks on all immediately adjacent street frontages (including Selby Street) to promote pedestrian access around the exterior of the site. New sidewalks are proposed on the eastern side of Toland Street, the southern side of Kirkwood Avenue, the western side of Rankin Street, the northern side of McKinnon Avenue, and along both sides of Selby Street.

Pedestrians would enter building A from adjacent streets through one of two ground-level lobbies: one on Toland Street and a second point of entry on Selby Street, both at mid-block. These lobbies would provide access to passenger elevators and stairs that would provide access to all parking and PDR levels of building A.

Pedestrian circulation at building B would be similar to pedestrian circulation at building A, except that the entry points to the main lobbies would differ. The pedestrian lobbies would be located mid-block along Rankin Street and a secondary point of entry mid-block on Selby Street.

### Transportation Demand Management Plan

Pursuant to planning code section 169, the project sponsor is required to submit a transportation demand management (TDM) plan application to the San Francisco Planning Department (planning department). The project sponsor expects to meet the TDM target points by implementing a combination of the following TDM measures:

- **Bicycle Parking (TDM Measure ACTIVE-2):** Bicycle parking would be provided for PDR and retail uses. The number of spaces provided for PDR and retail uses would comply with the planning code.
- **Showers and Lockers (TDM Measure ACTIVE-3):** Showers and clothes lockers would be provided with class I bicycle parking spaces. The number of showers and clothes lockers would meet planning code requirements.
- **Car-Share Parking (TDM Measure CSHARE-1):** Car-share spaces would be provided in buildings A and B in accordance with the planning code.

### Streetscape Improvements and Wind Mitigation Measures

The proposed project would be required to comply with the city's Better Streets Plan (planning code, section 138.1).[16] Thus, a streetscape plan would be submitted to the planning department. On-street parking would also be provided in accordance with the Better Streets Plan; proposed on-street parking would be comprised of reverse-angle and parallel parking stalls.

[16] San Francisco Planning Department, *San Francisco Better Streets Plan* (2010), *http://www.sf-planning.org/ftp/BetterStreets/proposals.htm#Final_Plan* (also available in hard copy at the San Francisco Public Library), accessed February 10, 2018.

Pursuant to the Better Streets Plan, the proposed project would provide streetscape improvements to the streets immediately adjacent to the project site (Figure 19, p. 34). The project area is classified as an industrial street type under this plan and would require new sidewalks, street trees, stormwater control measures, and accessible curb ramps. There are currently no sidewalks adjacent to the project site. Pursuant to public works code section 806(d), the proposed project would be required to provide 216 street trees along the project's 4,300 linear feet of street frontages or to pay the appropriate in-lieu fees. Due to project and site constraints (e.g., curb cuts, I-280 overpass, line-of-sight restrictions, and location of site utilities), the project sponsor would plant approximately 124 street trees and pay the corresponding in-lieu fee for the remaining required trees that cannot be accommodated onsite.[17] These 124 street trees would be consistent with the Better Streets Plan and subject to the review and approval by the department of public works, Bureau of Urban Forestry. The nine street trees on the eastern sidewalk of Toland Street along the northern half of the building (from the building A entrance to Kirkwood Street) would serve as wind mitigation measures; they would be approximately 25-foot-tall evergreen street trees with a 15-foot diameter canopy.[18]

The streetscape improvements to Toland Street would involve constructing a new 10-foot-wide sidewalk with street trees. An approximately 6-foot-wide, mid-block *bulb-out*[19] with planters and street trees would be constructed along the main pedestrian entrance. This portion of the sidewalk would be 16 feet wide. The project would provide an improved vehicular travel lane and up to four on-street parallel parking spaces on the eastern side of Toland Street. In addition, two approximately 34-foot-wide driveways would be added along Toland Street to provide vehicular access onto the site. This portion of Toland Street would be resurfaced.

Along Kirkwood Avenue, a new 12-foot-wide sidewalk would be constructed, and street trees would be installed adjacent to the project site. Each building would provide two 24-foot wide curb cuts to access the PDR and/or maker space loading areas. A curb and gutter system would be installed on the northern side of Kirkwood Avenue. The full width of Kirkwood Avenue along the project limits would be resurfaced.

Along Rankin Street, new 10-foot-wide sidewalks with street trees would be installed. An approximately 6-foot-wide, mid-block bulb-out with planters and street trees would be constructed along the main pedestrian entrance. This portion of sidewalk would be 16 feet wide. The project would provide a vehicular travel lane and up to five striped parallel, on-street parking spaces on the western side of Rankin Street. In addition, two approximately 34-foot-wide driveways would be added along Rankin Street to provide site access. This portion of Rankin Street would be resurfaced.

Along McKinnon Avenue, a new 12-foot-wide sidewalk would be constructed, and street trees would be installed adjacent to the project site. Two approximately 6-foot-wide mid-block bulb-outs with planters and street trees would be installed adjacent to each building's retail space. These two portions of the sidewalk would be 18 feet wide. Each building would provide a 40-foot-wide curb cut to provide site access. A 16-foot-wide travel lane would be provided and the portions of McKinnon Avenue that extend from the centerline of the right-of-way and the site. This portion of McKinnon Avenue would be resurfaced.

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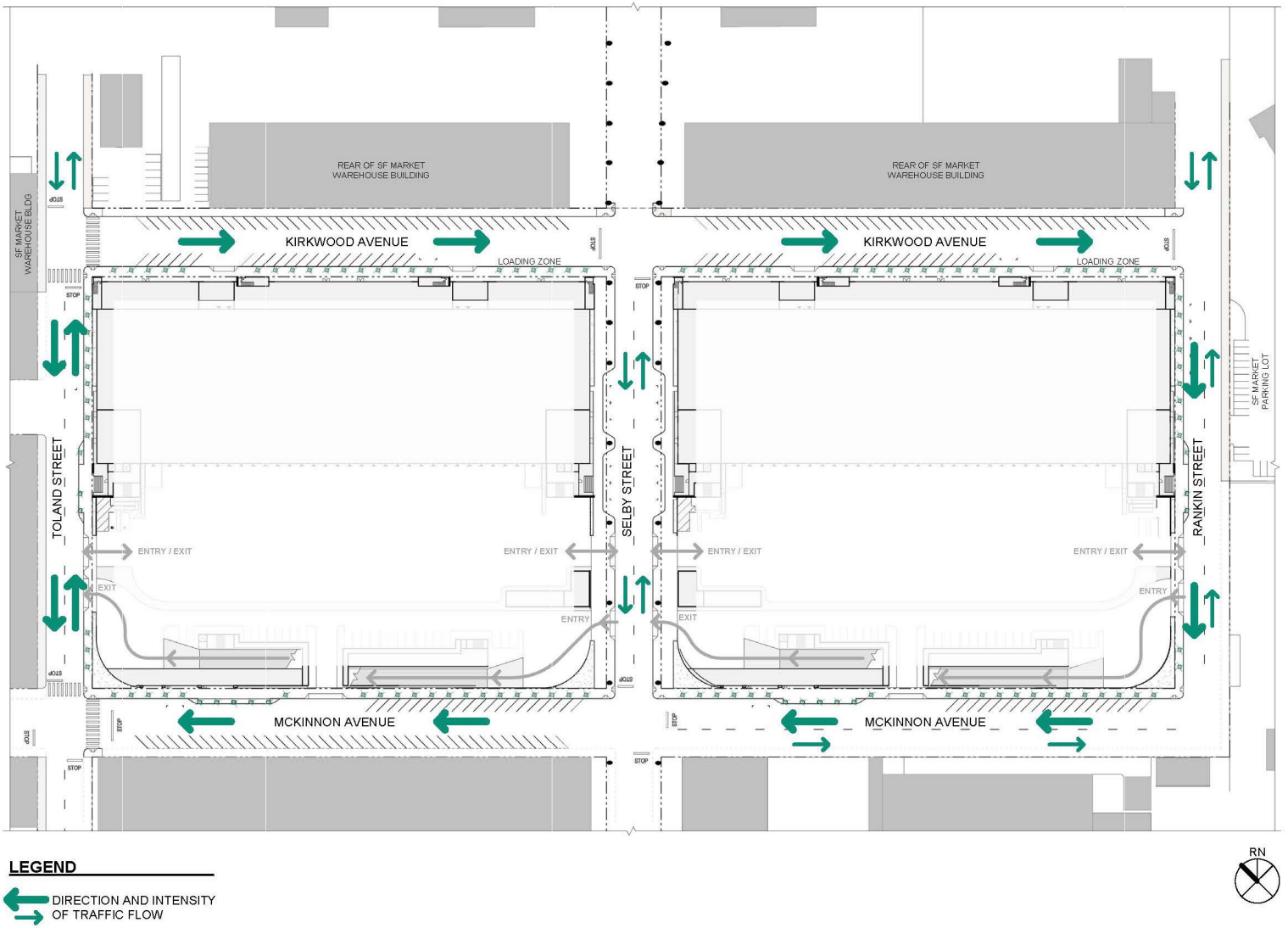
17 San Francisco Planning Department, Greenhouse Gas Analysis: Compliance Checklist for the San Francisco Gateway Project (749 Toland Street and 2000 McKinnon Avenue, December 19, 2019. This document (and all documents cited in this initial study, unless otherwise noted) is available for review on the San Francisco Property Information Map, which can be accessed at http://sfplanninggis.org/PIM/?. Individual files can be viewed by clicking on the Planning Applications link, clicking on the "More Details" link under the project's environmental case number (2015-012491ENV), and clicking on the "Related Documents" link.

18 BMT, San Francisco Gateway Project Final Wind Microclimate Study, June 23, 2020.

19 Bulb-outs extend the sidewalk into the parking lane to narrow the roadway and provide additional pedestrian space at key locations; they can be used at corners and mid-block.

**Figure 19 Proposed Streetscape Plan**




Source: JLA, 2021

## Sustainability

The proposed project has been designed to be sustainable and resilient by providing flexible PDR space that could accommodate an evolving mix of users and serve the changing needs in the city for a 100-year period or longer. Additionally, the project would seek LEED Gold certification or higher. Buildings A and B would be designed to contain sustainability features such as a rooftop screen containing a solar array. This array would be sized to meet the San Francisco Better Roof Ordinance requirements and would generate electricity that could be used to offset the electrical use of the building and/or the electric vehicles housed and/or visiting the site. In addition, all docking stations are being designed to support electric plug-in of trucks to reduce idling time during loading and unloading of trucks serving future land uses onsite, thereby further minimizing onsite idling and resultant fuel use. Additional features to achieve LEED Gold certification would include the use of sustainable building materials, water- and energy-efficient mechanisms in the building design, bicycle facilities to encourage alternate modes of transportation, and indoor air quality measures to ensure tenant safety.

## Foundation and Excavation

The proposed project's foundation design is expected to be concrete spread footings and/or grade beams on improved and engineered soil, with excavation for the foundations likely to extend 10 feet below existing grade. Typical foundation excavation is expected to extend to 7 feet below grade, with elevator pits and utility trenching extending to 10 feet below existing grade.

Ground improvements, such as stone columns, drill displacement columns,[20] *geopiers*,[21] soil-cement mixing, or other similar methods, would provide vertical support through the existing soils to strengthen the undocumented fill that underlies the project site. Using drill rigs, approximately 7,000 vibratory replacement stone columns or drill displacement columns would be extended 25 feet deep and approximately 900 auger cast piles would be extended 60 feet deep to support the buildings onsite. The proposed project would not require pile-driving activities. Approximately 140,600 cubic yards of soil would be excavated for the proposed project.[22] Of this total, approximately 42,600 cubic yards would be improved and reused, and the remaining 98,000 cubic yards would be exported offsite. Ground improvements, such as extended piles, stone columns drill displacement columns, geopiers, soil-cement mixing, or other similar methods, would provide vertical support through the existing soils to strengthen the undocumented fill that underlies the project site. The proposed project would import approximately 2,000 cubic yards of soil to the site. At least four underground storage tanks were historically present on the project site along Selby Street and one additional underground storage tank may have been present near the site's easternmost corner.[23] Although the number of underground storage tanks present onsite is not known, the project sponsor would coordinate with the San Francisco Department of Public Health and comply with all permit requirements under the city's Hazardous Materials and Waste Program, which may result in the need for soil excavation and remediation activities. The total soil excavation volume (140,600 cubic yards) and the total volume of exported soil offsite (98,000 cubic yards) included in the estimates above would account for potential excavation, export, and remediation activities.

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20 Drill displacement columns (or controlled low-strength material columns) are formed in displaced soil cavities and displace liquefiable and compressible soil with cemented controlled low-strength material. Controlled low-strength material column ground improvement can mitigate liquefaction and settlement of heavy foundations and slabs. Controlled low-strength material columns are ideal for sensitive project sites such as those near critical structures that require low noise and no vibration construction methods.

21 "Geopier" is an engineering term used to refer to stiff rock columns drilled deep into the earth's surface, down to a hard nonyielding depth. They are used to support a building foundation and reinforce the soil when the existing ground is unstable, wet or unsuitable for building construction.

22 The proposed project would entail excavation of 140,600 cubic yards of soil. This total includes 134,000 cubic yards of soil onsite and 6,600 cubic yards of soil for street improvements.

23 Phase I and phase II ESAs, pp. v and 3.

Because of the presence of shallow groundwater 3 to 6 feet below ground surface, temporary dewatering and shoring of utility trenches is anticipated to be required in some areas of the site.[24]

## Construction Schedule and Phasing

This section describes the construction activities for the proposed project. Construction is anticipated to occur over a total of approximately 31 months. The construction of each building would take approximately 27 months; however, the start of construction for building A would be approximately four months before the start of construction for building B, resulting in a total construction duration of approximately 31 months. As described in Table 4, construction would include demolition and site preparation, grading and ground improvements, building construction, building envelope and interior buildout, sitework, and startup and commissioning.[25] Construction work would typically occur five to six workdays per week for eight hours per day. Nighttime construction activities are anticipated to occur during specific phases of building construction—specifically, the building envelope and interior buildout phase, and the sitework phase. Nighttime construction activities, as defined by article 29 of the San Francisco Department of Public Health, are construction activities occurring between 8 p.m. and 7 a.m. The project sponsor would be required to obtain a permit from the San Francisco Public Works or the Department of Building Inspection (building department) to extend construction activities beyond the allowable construction hours (7 a.m. to 8 p.m.). The total number of temporary/short-term workers during the approximate 31-month duration of construction is anticipated to range from approximately 2,500 to 3,000.

**Table 4 Construction Phasing**

| Construction Phase | Duration (weeks) |
|---|---|
| Demolition and Site Preparation | 8 |
| Grading and Ground Improvements | 16 |
| Building Construction | 61 |
| Building Envelope and Interior Buildout | 60 |
| Sitework | 25 |
| Startup and Commissioning | 7 |
| **Total** | **31 months[1]** |

Note:

[1] Construction duration would total 31 months, which would include several months of overlapping phases, primarily during Building Construction, Building Envelope and Interior Buildout, and Site Work. In addition, the start of construction for building A would be approximately 4 months before the start of construction for building B.

On June 7, 2021, the project sponsor submitted a priority processing application under Planning Director's Bulletin No. 2, committing the project to use the lowest diesel emitting off-road equipment (Tier 4 interim or final) for the duration of construction.[26,27] On June 15, 2021, the planning department approved this application.[28]

[24] Cornerstone Earth Group, *Preliminary Geotechnical Investigation, LaSalle Industrial Park, San Francisco*, April 22, 2015 (hereinafter referred to as "geotechnical investigation").

[25] In the final stages of construction, the project would undergo commissioning of building systems to ensure that they are complete and functioning properly as designed. In addition to the standard building commissioning, LEED components would undergo fundamental commissioning and verification.

[26] Prologis, *Application for Priority Application Processing for Director's Bulletin No. 2,* June 7, 2021.

[27] Prologis, *Priority Application Processing for Clean Construction Projects, Supplemental Application for Type 3 Priority Projects for Director's Bulletin No. 2,* June 7, 2021.

[28] San Francisco Planning Department, *Signed Application for Priority Application Processing for Director's Bulletin No. 2,* June 15, 2021.

Approximately 400 to 500 workers are expected to travel to the site daily at any given time during peak construction periods. Carpooling and use of public transportation would be encouraged. It is anticipated that construction parking would be located onsite, on Selby Street which would be temporarily closed during construction, and on surrounding city streets.

Construction access for truck haul routes are indicated on Figure 20 (p. 38). A traffic control plan established by the construction contractor would be necessary during construction to complete the streetscape improvements in the public right-of-way along with other features. Additionally, use of the right-of-way may be necessary during demolition; soil off-hauling; deliveries of steel, precast concrete, and concrete; and other construction phases.

## Expanded Streetscape Variant

An expanded streetscape variant is analyzed in this environmental review (Figure 21, p. 39). The expanded streetscape variant comprises the same land uses and site plan as the proposed project but would improve the remainder of adjacent public rights-of-way to Better Streets standards. The variant would include improvements from the center line of each adjacent street outward to the property line of the adjacent lots. These improvements would include new roadways, curb cuts, sidewalks, street trees, and other amenities. These improvements are studied to provide environmental clearance in the event the improvements are carried out by the project sponsor or other parties in the future.

Along Toland Street, between Kirkwood Avenue and McKinnon Avenue, the variant would include resurfacing the southbound side of the street. It would include extending the existing 10-foot sidewalk and planting approximately 13 street trees from the Kirkwood intersection to the McKinnon intersection. New curb ramps would be provided at both sides of the Toland Place intersection. Curb ramps and crosswalks would be provided at the southern and western sides of the Toland and McKinnon intersection. Five curb cuts of varying widths (24 to 40 feet) would be provided to maintain existing building access points.

Along Kirkwood Avenue, the variant would include building a 12-foot sidewalk, installing a curb and gutter, and planting approximately 55 street trees on the northern side of the street.

Along Rankin Street, the northbound side of the street would be resurfaced. A 10-foot sidewalk with approximately 11 street trees and curb and gutter would connect the existing sidewalk at 901 Rankin Street to McKinnon Avenue. One 30-foot-wide curb cut would be added to maintain existing access to the 1900 Newcomb Avenue site.

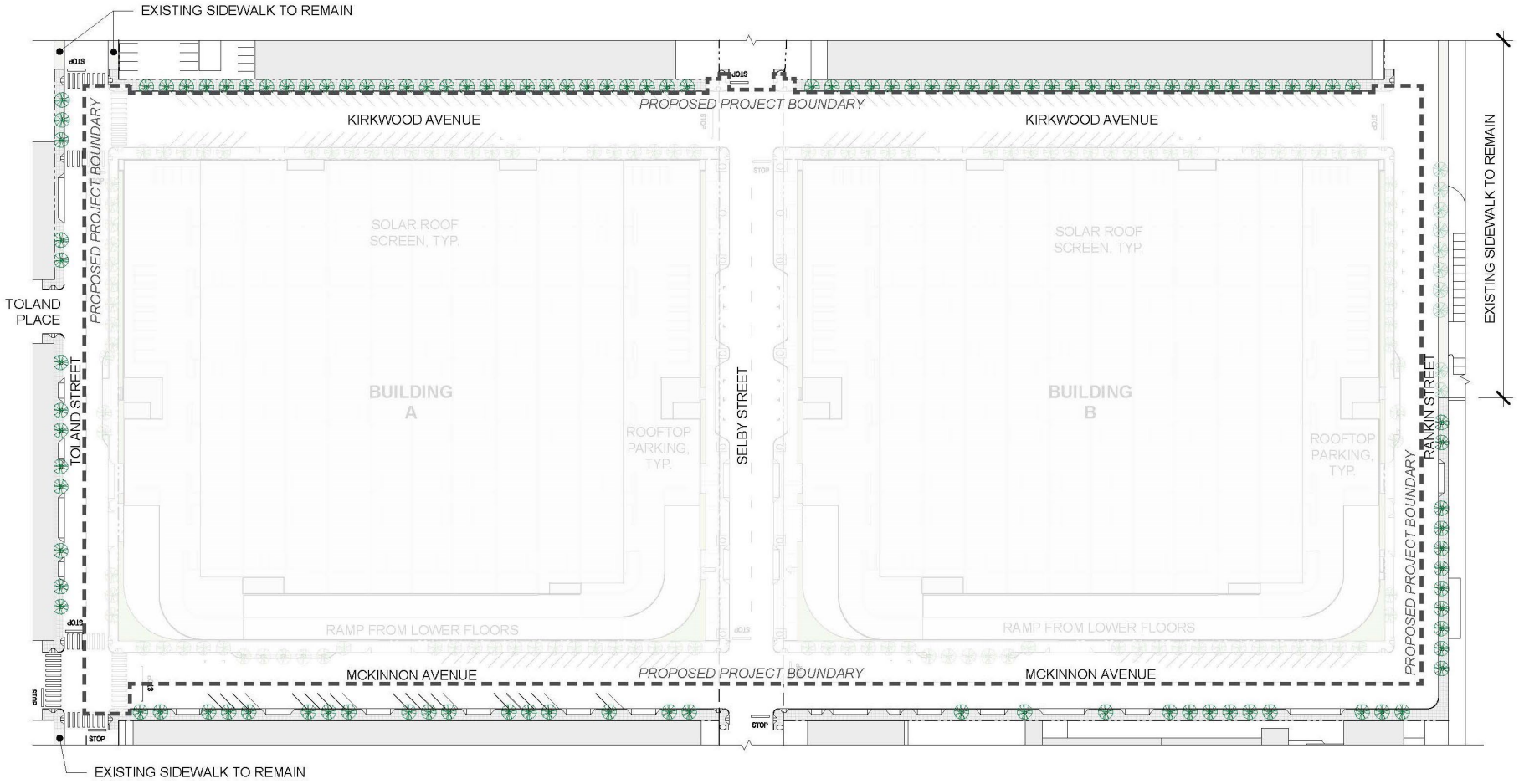
Along McKinnon Avenue, between Selby and Toland streets, the variant would include resurfacing the southern side of the street, installing a new curb and gutter, providing approximately 16 back-in diagonal parking spaces, and building a 12-foot sidewalk with approximately 17 street trees. Six 24-foot-wide curb cuts would be added to maintain existing access to properties on the southern side of McKinnon Avenue. Curb ramps would be included on the southwestern and southeastern corners of the intersection with Selby Street. On McKinnon Avenue, between Selby and Rankin streets, the variant would include resurfacing the southern side of the street, installing a new curb and gutter, and building a 12-foot sidewalk with approximately 12 street trees. Eight curb cuts of varying widths (10 to 50 feet) would be added to maintain existing access to properties on the southern side of McKinnon Avenue.

The maximum depth of ground disturbance associated with the streetscape improvements would be no more than 3 feet. Less than 100,000 square feet of surface area would be disturbed as part of the variant.

**Figure 20 Proposed Construction Access**


Source: AECOM 2019

## Figure 21 Expanded Streetscape Variant




Source: JLA 2022

## Required Approvals

Certification of the final environmental impact report (EIR) by the San Francisco Planning Commission (planning commission), which would be appealable to the San Francisco Board of Supervisors (board of supervisors), is required before any discretionary approvals or permits can be issued for the proposed project. The following is a preliminary list of anticipated approvals for the proposed project. The list would apply to the proposed project and the expanded streetscape variant and is subject to change.

### Actions by the San Francisco Planning Commission

- Recommendation to the board of supervisors to approve the planning code and zoning map amendments for height district reclassification and to adopt a new special use district
- Approval of a Planned Unit Development-Conditional Use Authorization in accordance with planning code sections 303 and 304 to permit a large-scale development on a site larger than one-half acre
- Recommendation to the board of supervisors to approve a development agreement
- Adoption of findings under the California Environmental Quality Act (CEQA)
- Approval of a TDM plan (planning code section 169)
- Recommendation to the board of supervisors to adopt amendments to the San Francisco General Plan (general plan) (if determined to be required)

### Actions by the San Francisco Board of Supervisors

- Approval of planning code and zoning map amendments for height district reclassification and to adopt a new special use district
- Approval of the development agreement

### Actions by Other City Departments

- *San Francisco Planning Department and San Francisco Department of Building Inspection* – Approval of the site permit and addenda thereto
- *Department of Building Inspection* – Approval of demolition, grading, and building permits for the demolition of the existing buildings, and construction of the new building and night noise permit for work performed outside the normal 7 a.m. to 8 p.m. construction hours
- *San Francisco Department of Public Works* – Approval of street tree application, approval of temporary use permits during construction and permanent streetscape improvements, a permit to plant street trees and a partial waiver from Public Works Code section 806(d) to provide 92 fewer street trees than required, and night noise permit for work performed outside the normal 7 a.m. to 8 p.m. construction hours

- *San Francisco Municipal Transportation Agency* – Approval of temporary use permits during construction, permanent curb modifications, and modifications to the roadway directions and lane configurations on the streets surrounding the project site

- *San Francisco Department of the Environment* – Approval of a Demolition Debris Recovery Plan

- *San Francisco Public Utilities Commission* – Approval of any changes to sewer laterals; approval of a modified Stormwater Control Plan; approval of an erosion sediment control plan before the start of construction, compliance with postconstruction stormwater design guidelines, including a stormwater control plan, new curb and gutter system, cistern design, and groundwater dewatering wells per San Francisco Health Code article 12B (joint approval with the San Francisco Department of Public Health)

- *San Francisco Department of Public Health* – If applicable, approval of a hazardous materials release plan and inventory program pursuant to San Francisco Health Code articles 21 and 21A; approval of a dust control plan pursuant to San Francisco Building Code section 106 and San Francisco Health Code article 22B; approval of a site mitigation plan and soil mitigation plan in compliance with San Francisco Health Code article 22A (the Maher Ordinance), development and implementation of the article 29 guidelines, and review and approval of groundwater dewatering wells (joint approval with the SFPUC)

## Actions by Other Agencies

- *Bay Area Air Quality Management District* – Issuance of permits for the installation and operation of emergency generators, and certification to the building department that all asbestos-containing building materials have been removed and properly disposed in accordance with the law before demolition of the existing buildings; additionally, approval of permits for installation, operation, and testing of individual air pollution sources associated with tenant-specific activities would be required on a case-by-case basis

- *Caltrans* – Coordination, review, and issuance of a Caltrans standard encroachment permit

# B. PROJECT SETTING

## EXISTING SETTING

The project site is bounded by Kirkwood Avenue to the north, Rankin Street to the east, McKinnon Avenue to the south, and Toland Street to the west. The project site is in the Bayview neighborhood and falls within the area covered by the Bayview Hunters Point Area Plan in the general plan. Because of the area's industrial use and specific transportation-related features, the surrounding street network is made up of relatively large blocks and many discontinuous streets with unregulated parking. Surrounding transportation features that shape access to the project site include the Caltrain right-of-way and associated berm and track; the two-level, elevated portion of the I-280 Caltrans right-of-way; and a number of discontinuous and/or uniquely configured surrounding streets. Evans and Jerrold avenues (north of the project site) and Oakdale Avenue (south of the project site) are the only east-west streets that cross the Caltrain tracks in the project area. This condition limits the east-west connectivity of Kirkwood and McKinnon avenues and encourages the flow of traffic from the project site westward onto Toland Street.

The project site is rectangular and is currently occupied by four single-story, 448,000-gross-square-foot PDR buildings. The project site and vicinity are relatively flat. View corridors are limited to streets, from which the most prominent features are the elevated segment of I-280 (approximately 55 feet in height) that bisects the project site and the hills west of U.S. 101 (Bernal Heights), east of Third Street, and south of Palou Avenue. The project vicinity is currently developed with commercial and industrial uses and features a number of large warehouse-type structures, along with some smaller, nonresidential buildings. Structures are one to three stories tall; are usually set close to the sidewalk or offset by paved parking areas, with little or no landscaping; and are constructed with steel frames and metal siding, a style similar to the existing buildings on the project site. The larger warehouse-type structures are generally windowless.

Two warehouses of the SF Market, each approximately 30 feet tall, are immediately adjacent to the project site on the northern side of Kirkwood Avenue to the east and west of Selby Street. Along the eastern side of Rankin Street, there are operations yards associated with the San Francisco Water Department and additional facilities of the SF Market. McKinnon Avenue, east of Selby Street, contains a variety of warehouse buildings that range in height from 20 feet to 30 feet. A warehouse building, with similar design to the buildings currently at the project site, is on McKinnon Avenue, west of Selby Street. There are two approximately 20- to 25-foot-tall warehouse buildings with multiple tenants along the western side of Toland Street, adjacent to Toland Place. North of these warehouses is a 35-foot-tall building occupied by the SF Market.

As part of their daily operations, PDR activities in these areas may produce noise, vibration, odor, and other emissions. Existing traffic from I-280 is a dominant noise source in the project vicinity. In general, the immediate vicinity of the project site is very noisy. New housing, large office developments, large-scale retail, and the heaviest industrial uses, such as incinerators, are not permitted in the PDR-2 district in which the site is located. Commercial and industrial uses are to the east toward the inlet for Islais Creek and San Francisco Bay. Residential uses primarily are to the north, west, and south of the PDR-2 use district where the proposed project would be located. The nearest residential use is approximately 450 feet southeast of the project site. There are no schools within 0.25 mile of the site.

The project site is currently served by the Third Street Muni light rail line and four bus lines. Transit stops in the project vicinity include stops for Muni bus lines 23-Monterey, 24-Divisadero, and 9-San Bruno, and San Mateo County Transit District bus line 292. The 23-Monterey Muni line operates immediately adjacent to the project

site,[29] with the closest stop at the corner of Toland Street and McKinnon Avenue, and the other bus lines operate within approximately four blocks of the site. The Third Street light rail line is approximately 0.4 mile east of the project site; the closest stops are Kirkwood/La Salle (0.6 mile southeast), Hudson/Innes (0.5 mile east), and Oakdale/Palou (0.7 mile southeast). The closest BART station is the 24th Street Mission station, approximately 1.5 miles to the northwest; the Glen Park BART station is approximately 2.5 miles to the southwest. The 22nd Street Caltrain Station is approximately 1.5 miles to the northeast.

## CUMULATIVE SETTING

Cumulative projects within an approximately 0.25-mile radius of the project site are discussed below and mapped in Figure 22 (p. 44). As of publication of this initial study, each project is undergoing environmental review with the planning department.

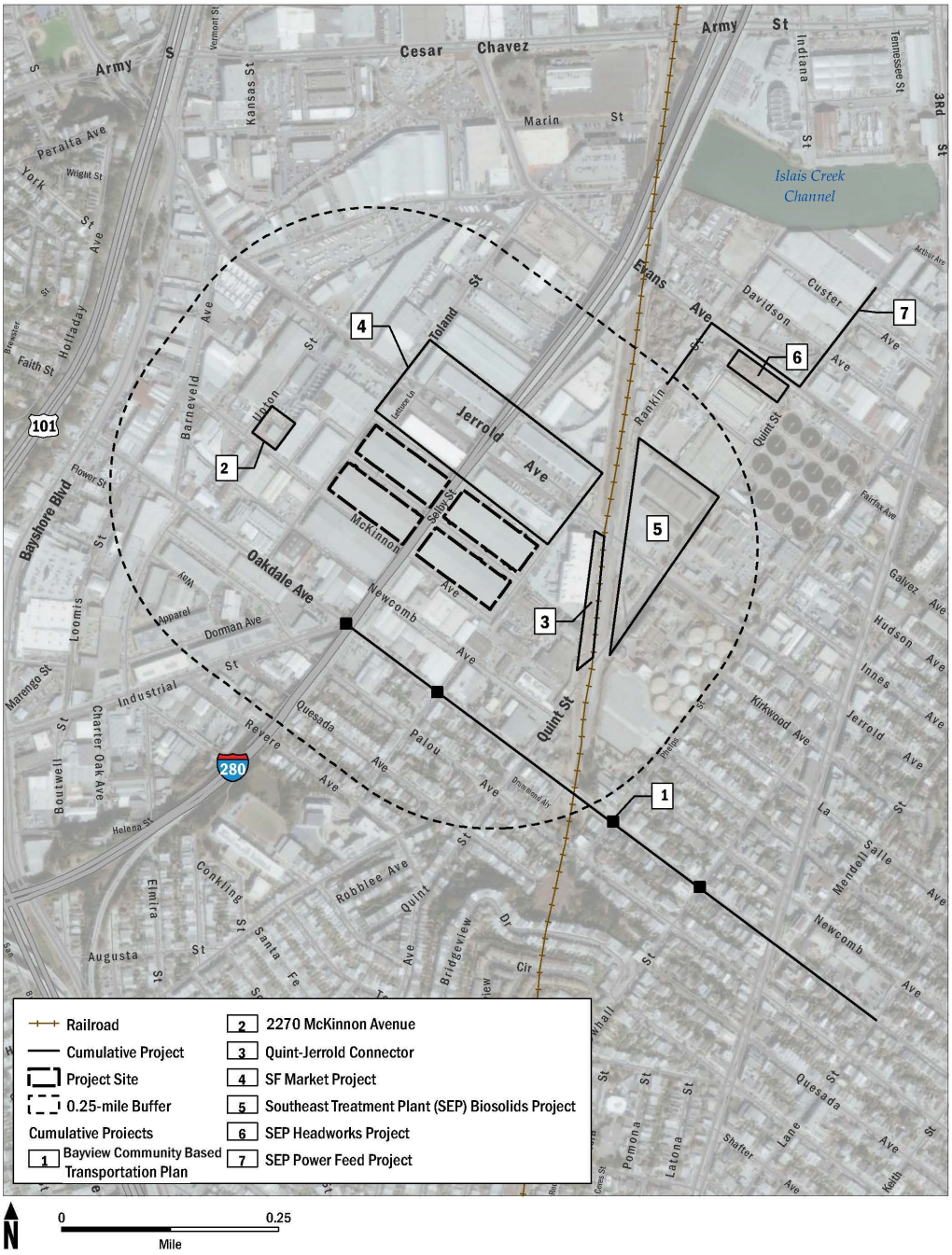
1. **Bayview Community Based Transportation Plan:** This is a community-driven planning effort funded through a Caltrans Sustainable Planning Grant. The SFMTA drafted this five-year investment plan for transportation infrastructure; the SFMTA Board of Directors approved it in February 2020. The Bayview Community Based Transportation Plan seeks to improve physical mobility in the Bayview community by focusing on solutions based on the needs of existing residents and businesses in the neighborhood. Through this community plan, the SFMTA proposes to implement a series of quick-build projects that improve pedestrian visibility and comfort at crossings and reduce vehicle speeds. Typical quick-build improvements include road diets (i.e., removing one or more travel lanes), paint, traffic delineators and street signs, parking and load adjustments, traffic signal timing, and transit boarding islands. As of publication of this initial study, Innes Avenue, Oakdale Avenue, and Phelps Street are locations proposed for quick-build improvements; however, only those on Oakdale Avenue are within the approximately 0.25-mile radius of the project site.

2. **2270 McKinnon Avenue (Planning Department Case No. 2021-001639ENV):** The project would demolish the existing accessory building to construct an approximately 119,900-square-foot building containing 111,100 square feet of self-storage use. The new building would be four stories and approximately 40 feet in height.

3. **Quint-Jerrold Connector (Planning Department Case No. 2013-0858E):** The proposed Quint-Jerrold Connector Road project would link Quint Street just north of Oakdale Avenue to Jerrold Avenue via a new road along the western side of the Caltrain tracks. This project would construct a new 950-foot-long roadway to provide access between existing Quint Street and Jerrold Avenue, which is now blocked by a Caltrain berm. The roadway would consist of two 13-foot-wide lanes (within a 50-foot-wide corridor), one northbound and one southbound. In addition, the project would construct or install several other elements along or beneath the length of the new roadway. Along the western side of the new roadway, the project would construct a new 5.5-foot-wide to 20-foot-wide sidewalk, depending on location; construct a new 27-foot-wide curb cut along the SF Market property; and install street trees and street lighting. Along the eastern side of the new roadway, the project would construct a new 6.5-foot-tall reinforced concrete retaining wall. A new intersection would be constructed at Jerrold Avenue that would allow for turns in all directions, accommodate trucks, and integrate with the SF Market's planned street reconfiguration. New sewer and water pipelines would be installed beneath the new roadway to provide onsite drainage and overall system reliability. The new road could also support a potential new Caltrain station at Oakdale Avenue.

[29] As part of the Palou Avenue Streetscape Improvement Project, the 23-Monterey Muni line was rerouted three blocks south, off Jerrold Avenue and onto Palou Avenue. Construction of this project was completed in spring 2020.

## Figure 22 Cumulative Projects near Project Site (0.25 Mile)




AECOM

San Francisco Gateway Project

4. **2270 McKinnon Avenue (Planning Department Case No. 2021-001639ENV):** The project would demolish the existing accessory building to construct an approximately 119,900-square-foot building containing 111,100 square feet of self-storage use. The new building would be four stories and approximately 40 feet in height.

5. **Quint-Jerrold Connector (Planning Department Case No. 2013-0858E):** The proposed Quint-Jerrold Connector Road project would link Quint Street just north of Oakdale Avenue to Jerrold Avenue via a new road along the western side of the Caltrain tracks. This project would construct a new 950-foot-long roadway to provide access between existing Quint Street and Jerrold Avenue, which is now blocked by a Caltrain berm. The roadway would consist of two 13-foot-wide lanes (within a 50-foot-wide corridor), one northbound and one southbound. In addition, the project would construct or install several other elements along or beneath the length of the new roadway. Along the western side of the new roadway, the project would construct a new 5.5-foot-wide to 20-foot-wide sidewalk, depending on location; construct a new 27-foot-wide curb cut along the SF Market property; and install street trees and street lighting. Along the eastern side of the new roadway, the project would construct a new 6.5-foot-tall reinforced concrete retaining wall. A new intersection would be constructed at Jerrold Avenue that would allow for turns in all directions, accommodate trucks, and integrate with the SF Market's planned street reconfiguration. New sewer and water pipelines would be installed beneath the new roadway to provide onsite drainage and overall system reliability. The new road could also support a potential new Caltrain station at Oakdale Avenue.

6. **SF Market Project (Planning Department Case No. 2009.1153E):** The proposed project is a phased development plan to expand the existing SF Market on its current site and would reconfigure the roadways around the project site to improve site access and safety. This would entail redirecting Jerrold Avenue through-traffic around the Main Site onto Innes Avenue. The project would be constructed in various phases over an approximate 20-year period. The site is split into three subareas: the Main Site, the 901 Rankin Street site to the east, and the 2101 Jerrold Avenue site to the west. The maximum development scenario would demolish 12 of the 13 buildings currently on the site and construct four new warehouse structures on the Main Site and one new warehouse structure on the 901 Rankin Street site. No alterations are proposed at the 2101 Jerrold Avenue site. All warehouses would have accessory office space. The 901 Rankin Street site has been constructed and consists of PDR space and accessory office space. Of the four future warehouse structures to be built on the Main Site, two would have rooftop parking. In addition, a small (approximately 4,000-square-foot) Operations Center would be constructed on the Main Site. There would be a total of 440 parking spaces and 186 loading spaces.

**San Francisco Public Utilities Commission Sewer System Improvement Projects in the Southeast Treatment Plant within approximately 0.25 mile of the Proposed Project:**

7. **San Francisco Public Utilities Commission Southeast Treatment Plant Biosolids Digester Facility Project (Planning Department Case No. 2015-00644ENV):** The SFPUC Southeast Treatment Plant Biosolids Digester Facility Project would replace and relocate the solids treatment facilities with more efficient, modern technologies and facilities designed to produce Class A biosolids. Demolition activities began in fall 2019, and construction is anticipated through May 2026. Project construction will require a five-year closure of two blocks of Jerrold Avenue, starting at the Caltrain right-of-way and up to the Southeast Treatment Plant entrance west of Phelps Street. It is possible that this project will continue to

be under construction at the time the proposed project commences construction; therefore, this project is included as part of the proposed project's cumulative construction analysis.

8. **San Francisco Public Utilities Commission Southeast Treatment Plant Headworks Project (Planning Department Case No. 2015-006224ENV):** The SFPUC Southeast Treatment Plant Headworks Project is part of the Sewer System Improvement Program (SSIP), a 20-year citywide program to upgrade aging sewer infrastructure projects to ensure a reliable and seismically safe system. The project is on the northwestern portion of the Southeast Treatment Plant at the location of the existing headworks facility, near the intersection of Rankin Street with Evans Avenue. The project would construct a new headworks facility, modify the Bruce Flynn Pump Station, and construct a new odor control structure. The project would demolish the existing headworks facility and would construct a new 250 million gallon per day (mgd), all-weather headworks wastewater treatment facility in its place. Construction began in 2018 and is scheduled for completion in September 2023, with substantial completion in August 2023. Construction staging would be located in the Southeast Plant, in parking and travel lanes of Evans Street (two travel lanes would be maintained), in a lot adjacent to the Bruce Flynn Pump Station, on Southeast Plant property along Phelps Street, and potentially offsite at the Pier 94 Backlands, Pier 94, and/or Pier 96. It is possible that this project will continue to be under construction at the time the proposed project commences construction; therefore, this project is included as part of the proposed project's cumulative construction analysis.

9. **San Francisco Public Utilities Commission Southeast Treatment Plant Power Feed Project (Planning Department Case No. 2017-015855ENV):** The SFPUC Southeast Treatment Plant Power Feed Facility Project would upgrade the existing Southeast Treatment Plant electrical infrastructure from 9 to 12 megavolt-amperes. The proposed electrical building is at the Southeast Treatment Plant, at the corner of Evans Avenue and Phelps Street. The objective of the project is to increase reliability, redundancy, and capacity of the electrical system at Southeast Treatment Plant by upgrading the existing 12-kilovolt primary feed from Hunters Point switchyard and obtaining a new 12-kilovolt feed from Potrero switchyard to provide redundancy for Southeast Treatment Plant facilities. Project work consists of constructing a new two-story building over the existing switching station to house the new primary switchgear. In addition, aging substations would be replaced, and new power monitoring and control system would be installed for additional reliability and efficiency.

In addition, routine infrastructure repair, maintenance, and improvement projects (e.g., roadway repaving, water main replacements, and sewer upgrades) are ongoing throughout the city under existing conditions. It is anticipated that such projects will continue to be implemented through the construction of the proposed project or expanded streetscape variant.

# C. COMPATIBILITY WITH EXISTING ZONING AND PLANS

| | *Applicable* | *Not Applicable* |
|---|---|---|
| Discuss any variances, special authorizations, or changes proposed to the Planning Code or Zoning Map, if applicable. | ☒ | ☐ |
| Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable. | ☒ | ☐ |
| Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection, or from Regional, State, or Federal Agencies. | ☒ | ☐ |

## REQUIRED PROJECT APPROVALS

Required variances, special authorizations, and changes to the planning code or zoning map; approvals from city agencies (other than the planning department or building department); and approvals from regional, state, or federal agencies (if applicable) are discussed in Section A, Project Description, pp. 37 and 39 through 40.

## CONFLICTS WITH ADOPTED PLANS AND POLICIES

This section discusses potential inconsistencies of the proposed project and expanded streetscape variant with applicable local plans and policies, as well as conflicts with regional policies (if applicable). Inconsistencies with existing plans and policies do not, in and of themselves, indicate a significant physical environmental effect within the meaning of CEQA. To the extent that adverse physical environmental impacts may result from such inconsistencies, these impacts are analyzed in this initial study under the specific environmental topic sections in Section E, Evaluation of Environmental Effects.

The proposed project would intensify land uses on an urban infill site, and to the extent that there are conflicts between the proposed project and applicable plans, policies, and regulations, those conflicts would be considered by city decision makers when they decide whether to approve, modify, or disapprove the proposed project. Similarly, the expanded streetscape variant would include additional improvements to local streets, sidewalks, parking, and landscaping, beyond the streetscape improvements of the proposed project. These changes would be similar to the streetscape improvements included as part of the proposed project. The staff reports and approval motions prepared for the decision makers as part of the entitlements approval process would include a comprehensive project analysis and findings regarding the consistency of the proposed project and the variant, if carried out by the project sponsor, with applicable plans and policies, independent of the environmental review process.

### San Francisco General Plan

The general plan provides general policies and objectives to guide land use decisions. The general plan contains ten elements (Commerce and Industry, Recreation and Open Space, Housing, Community

Facilities, Urban Design, Environmental Protection, Transportation, Air Quality, Community Safety, and Arts) that set forth goals, objectives, and policies for the physical development of the city.

The general plan Urban Design Element, which guides the physical character and order of the city, addresses both new development and preservation of the landforms, views, and development patterns that define the city's character. This element aims to enhance and conserve the city's positive attributes and improve the living environment by protecting public views of open space and water bodies, and enhancing the aesthetic character of San Francisco.

The Urban Design Element, particularly Policies 3.5 and 3.6,[30,31] include general guidance on building heights and bulk. These policies focus on respecting the natural topography, tapering heights toward San Francisco Bay, and protecting views from major streets. Although the proposed project building height would exceed the existing 65-foot height limits of the site's height and bulk district and would be taller than the surrounding development pattern, it would not conflict with the Urban Design Element guidance allowing for taller buildings along I-280. The height would not substantially detract from views of the hills or open space in the neighborhood, because it would be viewed with the elevated I-280, and because views of the hills (to the west) and San Francisco Bay (to the east) are narrow, channelized views along the major streets. The street grid in the project vicinity is not continuous, so distant views to the hills and San Francisco Bay are blocked by intervening buildings. Policy 3.6 aims to relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction. The intent of this policy is not to limit the total floor space that could be built, but provide guidelines to avoid negative external effects such as encouraging efforts to articulate and soften building surfaces to reduce the appearance of large new buildings. The PDR-2-zoned buildings to the north, west, and south of the project site also consist of large, rectangular buildings with large floor plates.

The planning department, planning commission, board of supervisors, and other city decision makers would evaluate the proposed project and expanded streetscape variant for conformance with all objectives and policies of the general plan and would consider potential inconsistencies as part of the decision-making process. The consideration of general plan objectives and policies is carried out independent of the environmental review process, as part of the decision to approve, modify, or disapprove a proposed project.

## San Francisco Planning Code

The planning code, which incorporates the San Francisco zoning maps, governs permitted uses, densities, and configuration of buildings in San Francisco. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless the proposed project or expanded streetscape variant either conforms to the planning code or is granted an exception pursuant to provisions of the planning code.

Because the project proposes building heights greater than the 65-foot height allowed in the applicable 65-J height and bulk district (i.e., up to 97 feet, excluding exempted appurtenances), planning code amendments for height district reclassification and associated zoning map amendments would be required to permit the proposed project and expanded streetscape variant. Additionally, because the project site is greater than one-half acre in size, a Planned Unit Development-Conditional Use Authorization would be sought for

[30] San Francisco General Plan Urban Design Element, Policy 3.5: Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development.

[31] San Francisco General Plan Urban Design Element, Policy 3.6: Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction.

exceptions to the planning code. If the proposed changes to the planning code and zoning map and the Planned Unit Development-Conditional Use Authorization are approved, the proposed project and expanded streetscape variant would not conflict with the planning code.

### Special Use District

The zoning changes and height and bulk district changes would be implemented through the creation of a special use district that would establish zoning controls for the project site. If the proposed special use district is approved, the proposed project and expanded streetscape variant would not conflict with applicable zoning regulations of the planning code.

### The Accountable Planning Initiative

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added section 101.1 to the planning code to establish the following eight priority policies:

1. Preservation and enhancement of neighborhood-serving retail uses;
2. Protection of neighborhood character;
3. Preservation and enhancement of affordable housing (see Section E.3, Population and Housing, topic 3 (b), with regard to housing supply and displacement issues);
4. Discouragement of commuter automobiles (see Section E.5, Transportation and Circulation, topic 5 (a));
5. Protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership;
6. Maximization of earthquake preparedness (see Section E.15, Geology and Soils, topics 14 (a) through 14 (d));
7. Landmark and historic building preservation (see Section E.4, Cultural Resources, topic 4 (a)); and
8. Protection of open space (see Section E.10, Shadow, topic 10 (a); and Section E.11, Recreation, topics 11 (a) and 11 (b)).

Prior to issuing a permit for any project that requires an initial study under CEQA; issuing a permit for any demolition, conversion, or change of use; and taking any action that requires a finding of consistency with the general plan, the city is required to find that the proposed project or legislation would be consistent with the priority policies. As indicated above, the compatibility of the proposed project and expanded streetscape variant with general plan objectives and policies that do not relate to physical environmental issues would be considered by city decision makers as part of their decision whether to approve or disapprove the proposed project and expanded streetscape variant. Any potential inconsistencies identified as part of that process would not alter the physical environmental effects of the proposed project.

### Bayview Hunters Point Area Plan

The project is in the Bayview Hunters Point Area Plan and in the Oakinba Activity Node. Activity nodes are “community-identified catalyst areas in which to focus public investment.” The Bayview Hunters Point Area Plan calls for maintaining industrial zones for PDR activities in the Oakinba subdistrict to strengthen the role of the Bayview’s industrial sector in the economy of the district, the city, and the region. The PDR nature of the proposed project and expanded streetscape variant are consistent with the objectives of the Bayview Hunters Point Area Plan and would not result in any inconsistencies with the Bayview Hunters Point Area Plan.

### Bayview Hunters Point Redevelopment Plan

The project is in the Oakinba Activity Node of the Bayview Hunters Point Redevelopment Plan. The Bayview Hunters Point Redevelopment Plan provides the implementation tools to carry out many of the goals of the 2000 Bayview Hunters Point Community Revitalization Concept Plan. The Bayview Hunters Point Redevelopment Plan identifies the planning goals and objectives for the Bayview Hunters Point area and identifies more specific guiding policies for redevelopment and revitalization activity in the Oakinba Activity Node, including creating a vibrant commercial center, maintaining and expanding industry in the area to increase the job base, and developing employment opportunities for local residents. The proposed project and expanded streetscape variant would not result in any inconsistencies with the plan.

### Other Plans and Policies

In addition to local plans and policies, there are several regional planning agencies whose environmental, land use, and transportation plans and policies consider the growth and development of the nine-county San Francisco Bay Area. Some of these plans and policies are advisory, and some include specific goals and provisions that must be adhered to when evaluating a project under CEQA. The regional plans and policies that are relevant to the proposed project and expanded streetscape variant are discussed below:

- The Association of Bay Area Governments/Metropolitan Transportation Commission Plan Bay Area 2050 is a state-mandated integrated long-range transportation and land use plan, establishing targeted growth areas and housing allocations, identifying priority transportation improvements, and setting forth directions and initiatives to reduce greenhouse emissions.

- The air district's 2017 Clean Air Plan – Spare the Air, Cool the Climate is a regional plan to protect public health and climate by reducing air pollution and greenhouse gas emissions and creating a vision for a year 2050 post-carbon economy.

- The San Francisco Regional Water Quality Control Board San Francisco Basin Plan is a state-mandated regional water quality control planning document that identifies beneficial uses for the region's water bodies and standards to achieve or maintain those beneficial uses.

The proposed project and expanded streetscape variant have been reviewed considering these regional plans and policies, and the proposed project and expanded streetscape variant would not obviously or substantially conflict with Plan Bay Area 2050 or the San Francisco Basin Plan. The air quality section in the EIR will evaluate whether the proposed project or the expanded streetscape variant would conflict with or obstruct implementation of the Clean Air Plan.

# D. SUMMARY OF ENVIRONMENTAL EFFECTS

The proposed project and the expanded streetscape variant could potentially affect the environmental topics(s) checked below. The following pages present a more detailed checklist and discussion of each environmental topic.

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

## APPROACH TO ANALYSIS

This initial study examines the proposed project and expanded streetscape variant to identify potential effects on the environment. For each item on the initial study checklist, the evaluation considered the impacts of the proposed project and expanded streetscape variant, both individually and cumulatively, with the exception of greenhouse gas emissions, which are evaluated only in the cumulative context. All items on the initial study checklist that have been checked "less-than-significant impact with mitigation incorporated," "less-than-significant impact," "no impact," or "not applicable" indicate that, upon evaluation, the planning department has determined that the proposed project and expanded streetscape variant could not have a significant adverse environmental effect related to that topic. A discussion is included for those topics checked "less-than-significant impact with mitigation incorporated" and "less-than-significant impact," as well as most items checked "no impact" or "not applicable." For items designated "no impact" or "not applicable," the conclusions regarding potential significant environmental effects are based on field observations, staff and consultant experience and expertise from similar projects, and/or standard reference materials available at the planning department. Such materials include the Transportation Impact Analysis Guidelines for Environmental Review; the California Natural Diversity Database; and maps published by the California Department of Fish and Wildlife, the California Division of Mines and Geology (e.g., Mineral Resource Zone maps and designations), and the California Department of Conservation's Farmland Mapping and Monitoring Program. Impacts identified as "potentially significant" are analyzed in the EIR or were evaluated in this initial study and found to be significant, but mitigation measures identified in this initial study and agreed to by the project sponsor would reduce those impacts to less-than-significant levels. The "potentially significant" designation used to identify topics that will be addressed in detail in the EIR does not reflect a determination that the proposed project or expanded streetscape variant would result in a significant impact related to a particular topic. Such topics are included in the EIR because additional analysis is needed to determine the potential effect with respect to that environmental topic.

The project setting sections of the initial study and technical studies reflect conditions at the project site when the environmental evaluation process began in 2017. As of August 2020, the project sponsor submitted

building permit applications for an interim use on the project site.[32] The environmental analysis of the initial study and technical sections analyze the changes that result from the construction and operation of the proposed project and the expanded streetscape variant, compared to the uses at the project site prior to the operation of the interim use, resulting in a more conservative analysis.[33]

### Effects Found to Be Potentially Significant

On the basis of this initial study, topics for which there are project-specific effects that have been determined to be potentially significant are:

- Transportation and circulation
- Noise (all topics except aviation-related topics)
- Air quality

These environmental topics will be evaluated in the EIR prepared for the proposed project and expanded streetscape variant.

### Effects Found Not to Be Significant or Not to Be Significant with Identified Mitigation Measures

The following potential individual and cumulative environmental effects would be less than significant or reduced to a less-than-significant level through implementation of identified mitigation measures included in this initial study and agreed to by the project sponsor:

- Land use and land use planning
- Population and housing
- Cultural resources
- Tribal cultural resources
- Greenhouse gas emissions
- Wind
- Shadow
- Recreation
- Utilities and service systems
- Public services
- Biological resources
- Geology and soils
- Hydrology and water quality
- Hazards and hazardous materials
- Mineral resources
- Energy
- Agriculture and forestry resources
- Wildfire

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[32] San Francisco Building Department (DBI) Permit #202008272769 (Building 417 shell) and San Francisco Building Department #202008272770 (Building 418 shell)

[33] Analyzing the change in the environment from the uses that occupied the site in 2017 to the proposed use is considered conservative, or worst-case, because the interim use is more intensive than the 2017 uses.

These items, along with appropriate mitigation measures, are discussed in Section E of this initial study and therefore require no further environmental analysis in the EIR. As indicated above, all identified mitigation measures listed in Section F, Mitigation Measures, have been agreed to by the project sponsor and would be incorporated into the proposed project and expanded streetscape variant as conditions of project approval.

## CEQA SECTION 21099(B)(1) (SENATE BILL 743)

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

In January 2016, OPR published for public review and comment its *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA,*[34] recommending that the transportation impacts of projects be measured using a vehicle-miles-traveled (VMT) metric. On March 3, 2016, based on compelling evidence in that document and the planning department's independent review of literature on level of service and VMT, the planning commission adopted OPR's recommendation to use the VMT metric instead of automobile delay in evaluating the transportation impacts of projects (resolution 19579). In December 2018, OPR released its *Technical Advisory on Evaluating Transportation Impacts in CEQA,*[35] finalizing these recommendations. Also, in December 2018, the Natural Resources Agency finalized updates to the CEQA Guidelines that replaced level of service with VMT as a transportation threshold in the Appendix. In December 2018, the Natural Resources Agency certified and adopted the CEQA Guidelines update package, including the Guidelines section implementing Senate Bill 743 (CEQA Guidelines section 15064.3). Use of a VMT metric for evaluating the transportation impacts of a project is consistent with planning commission resolution 19579, adopted March 3, 2016, replacing level of service with VMT when evaluating the effects of a project on the transportation system. Accordingly, the EIR will not contain a discussion of automobile delay impacts based on level of service criteria; instead, a VMT and induced automobile travel impact analysis will be provided in the EIR.

### Aesthetics and Parking Analysis

California Public Resources Code section 21099(d), effective January 1, 2014, provides that "aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment." Accordingly, aesthetics and parking are not considered in determining whether a project has the potential to result in significant environmental effects for projects that meet all of the following three criteria:

1. The project is in a transit priority area
2. The project is on an infill site

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[34] Governor's Office of Planning and Research (OPR), Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, *https://opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf,* accessed December 22, 2021.

[35] Governor's Office of Planning and Research (OPR), Technical Advisory on Evaluating Transportation Impacts in CEQA, *https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf,* accessed December 22, 2021.

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

The proposed project and expanded streetscape variant meet each of the above three criteria because they (1) are within one-half mile of a major transit stop along the Third Street light rail line and several Muni bus lines,[36] (2) are on a developed site in an urban area and surrounded by urban development along the project site's boundaries, and (3) meet the definition of an employment center because they are on a property zoned for commercial use with a floor area ratio of no less than 0.75 and are in a transit priority area. Because the proposed project and expanded streetscape variant meet each of the above three criteria,[37] the initial study and the EIR do not consider aesthetics and the adequacy of parking in determining the significance of project impacts under CEQA. No aesthetics section is included; however, for informational purposes, the project description includes a three-dimensional rendering of the project in relation to its surroundings (Figure 6, p. 11), and elevations depicting the project (Figures 15 and 16, pp. 27 and 28). Additionally, parking will be addressed in the EIR only for purposes of analyzing whether the project or variant would result in a substantial parking deficit, the secondary effects of which would create potentially hazardous conditions, interfere with accessibility, or substantially delay public transit.

## CUMULATIVE IMPACT ANALYSIS

Two approaches to a cumulative impact analysis are provided in CEQA Guidelines section 15130(b)(1): (a) 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 (b) a summary of projections contained in a general plan or related planning document can be used to determine cumulative impacts. The analyses in this initial study employ both a list-based approach and projections from the general plan or other related planning documents, as appropriate for the specific environmental topic being analyzed.

The following factors were used to determine an appropriate level for cumulative analysis in this initial study:

- *Similar Environmental Impacts*. A relevant project contributes to effects on resources that are also affected by the proposed project or expanded streetscape variant. A relevant future project is defined as one that is "reasonably foreseeable," such as a proposed project for which an application has been filed with the approving agency or funding has been approved.

- *Geographic Scope and Location*. A relevant project is located in the geographic area within which effects could combine. The geographic scope varies on a resource-by-resource basis. For example, because wind impacts are generally localized, the cumulative context for wind analysis is the project site and vicinity within about 1,500 feet of the project site. In contrast, the geographic scope for evaluating cumulative effects on regional air quality consists of the affected air basin (i.e., the San Francisco Bay Area Air Basin).

[36] San Francisco Planning Department, San Francisco Transportation Information Map, *https://sfplanninggis.org/TIM/*, accessed December 19, 2018.

[37] San Francisco Planning Department, Eligibility Checklist: CEQA section 21099 – Modernization of Transportation Analysis, San Francisco Gateway Project, December 19, 2018.

- *Timing and Duration of Implementation*. Effects associated with activities for a relevant project (e.g., short-term construction or demolition or long-term operations) would most likely coincide with the related effects of the proposed project or expanded streetscape variant.

The cumulative projects within approximately 0.25 mile of the project site are identified in Section B, Project Setting, Cumulative Setting, pp. 43 through 46. However, additional projects more than 0.25 mile from the project site may also be considered in the cumulative analysis, as appropriate, for the environmental topic being analyzed.

# E. EVALUATION OF ENVIRONMENTAL EFFECTS

## E.1. Land Use and Planning

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

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

**PROPOSED PROJECT**

The division of an established community would typically involve the construction of a physical barrier to neighborhood access (such as a new freeway segment) or the removal of a means of access (such as a bridge or roadway). The proposed project would demolish four existing buildings and construct two multi-story PDR buildings within the existing lot configuration. The proposed project would not create a barrier or obstruction (such as a new freeway segment) that would physically divide the community or Bayview neighborhood. The proposed project would be developed within already-established city blocks and would not permanently close any streets or sidewalks. The project sponsor proposes converting Kirkwood Avenue from a two-way street to a single-lane, eastbound, one-way street, and converting a portion of McKinnon Avenue (between Toland and Selby streets) from a two-way street to a single-lane, westbound, one-way street. As discussed above in Section A, Project Description, modifications to the roadway directions and lane configurations on the streets surrounding the project site would require approval by the SFMTA. If approved, these proposed changes would change the circulation directly adjacent to the project site; they would not, however, create a barrier or obstruction or close either street, modifications that could physically divide the community. Selby Street would be temporarily closed during construction for equipment staging and construction worker parking. This street would reopen upon completion of construction and would not permanently impede the passage of persons or vehicles through the Bayview neighborhood. For these reasons, the proposed project would have a less-than-significant impact with respect to physically dividing the surrounding community, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, intensity, and site plan as the proposed project, but would extend streetscape improvements for the entire cross section of the streets along the project perimeter to Better Streets standards. Because these changes would not alter the proposed land uses, their intensities, or layout, or introduce new physical barriers that could alter local circulation or

access, the expanded streetscape variant would have land use impacts similar to those of the proposed project. No mitigation measures would be required. This topic will not be addressed in the EIR.

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

**PROPOSED PROJECT**

Land use plans and policies adopted for the purpose of avoiding or mitigating an environmental effect are those that directly address physical environmental issues and/or contain targets or standards that must be met to preserve or improve characteristics of San Francisco's physical environment. Applicable land use plans that regulate development on the project site include the general plan and the planning code. As discussed in Section C, Compatibility with Existing Zoning and Plans, the proposed project would not conform to the existing 65-J height and bulk district, and the project sponsor seeks amendments to the planning code and zoning map to allow taller buildings than permitted under the existing zoning district. Additionally, the project sponsor would apply for a Planned Unit Development-Conditional Use Authorization due to the size of the proposed project. If the proposed changes to the planning code and the Planned Unit Development-Conditional Use Authorization are approved, the proposed project would not conflict with the planning code. The proposed uses, however, are consistent with and allowed under the PDR-2 zoning district. Therefore, with the proposed planning code and zoning map amendments discussed in the project approvals section above, the proposed project would not conflict with relevant planning code regulations.

Conflicts with existing plans and policies do not, in themselves, indicate a significant environmental effect related to the topic of Land Use and Land Use Planning. A significant impact would occur only if the project substantially conflicts with a land use plan/policy that was adopted for the purpose of avoiding or mitigating an environmental effect and would result in a substantial adverse physical change in the environment. The proposed project would adhere to applicable environmental regulations and therefore would not conflict with land use policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect.

Therefore, the proposed project would have a less-than-significant impact with regard to conflicts with existing land use plans, policies, or regulations adopted for the purpose or avoiding or mitigating an environmental effect, and no mitigation measures would be required. The physical environmental impacts from implementation of the proposed project, including the project's proposed building heights, are analyzed in each of the environmental topic sections in this initial study and in the EIR. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would have land use impacts similar to those of the proposed project, which were less than significant with regard to conflicts with existing land use plans, policies, or regulations adopted for the purpose or avoiding or mitigating an environmental effect, and no mitigation measures would be required. The physical environmental impacts from implementation of the expanded

streetscape variant, including the proposed building heights (which would be the same as the proposed project), are analyzed in each of the environmental topic sections in this initial study and in the EIR. This topic will not be addressed in the EIR.

**Impact C-LU-1: The proposed project or variant, in combination with cumulative projects, would result in less-than-significant cumulative land use impacts. (Less than Significant)**

**PROPOSED PROJECT**

Section B, Cumulative Setting, p. 43, identifies cumulative projects that are within an approximately 0.25-mile radius of the project site. These projects are also shown on Figure 22 (p. 44).

With the exception of the project at 2270 McKinnon Avenue, the identified cumulative projects in the project vicinity are either pedestrian enhancement projects, or infrastructure improvement or replacement projects. The Bayview Community Based Transportation Plan would make the surrounding area more accessible for pedestrians in the Bayview neighborhood. The Quint-Jerrold Connector project would improve neighborhood connectivity and provide pedestrian safety features by connecting Quint Street to Jerrold Avenue adjacent to the Caltrain tracks. The cumulative projects in the Southeast Treatment Plant site (SFPUC Southeast Treatment Plant Biosolids Digester Facilities, SFPUC Southeast Treatment Plant Power Feed, and SFPUC Southeast Treatment Plant Headworks Project) would upgrade aging sewer infrastructure. These SFPUC projects are within the treatment plant boundaries and are largely in-kind replacements and/or interior system or infrastructure improvements. The 2270 McKinnon Avenue project would demolish the existing accessory building onsite and redevelop the site with a larger building that would contain self-storage units. All development for this project would be contained on the existing parcel and would not physically divide an established community.

Upon completion, the proposed project would operate in the existing parcels and would not physically divide an established community; therefore, it would have no potential to combine with cumulative projects to result in a significant physical environmental impact related to dividing an established community.

All projects must conform with the planning code, including its zoning maps, and are required to be generally consistent with general plan. Therefore, the proposed project in combination with cumulative projects would not result in a significant cumulative impact related to a conflict with a land use plan, policy, or regulations adopted for the purpose of mitigating an environmental impact. Conflicts with existing land use plans and policies are policy issues and do not, in themselves, give rise to a significant physical impact related to land use under CEQA. Therefore, the conflicts with plans and policies, considered with those of cumulative projects, could not combine to result in a significant cumulative impact related to land use. To the extent that the proposed project results in physical environmental effects that could combine with those of cumulative projects, the cumulative impact on the environment is addressed under each topic section in this initial study, or will be addressed in the EIR.

For these reasons, the proposed project would not combine with cumulative projects to result in cumulative land use impacts, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets

standards. Therefore, the expanded streetscape variant would have land use impacts similar to those of the proposed project. Upon completion, the expanded streetscape variant would operate in the existing parcels and adjacent streets and sidewalks and would not physically divide an established community; therefore, it would have no potential to combine with cumulative projects to result in a significant physical environmental impact related to dividing an established community. Additionally, conflicts with existing land use plans and policies are policy issues and do not, in themselves, give rise to a significant physical impact related to land use under CEQA. Therefore, the conflicts with plans and policies, considered with those of cumulative projects, could not combine to result in a significant cumulative impact related to land use.

For these reasons, the expanded streetscape variant would not combine with cumulative projects to result in cumulative land use impacts, and no mitigation measures would be required. This topic will not be addressed in the EIR.

## E.2. Population and Housing

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

Existing uses on the project site in 2017 consisted of automotive storage, fleet management, general storage, food-related storage, temporary storage, and vacant spaces. Because there are no residences on the project site, the proposed project or the expanded streetscape variant would not displace substantial numbers of existing people or housing that would necessitate the construction of replacement housing elsewhere. Therefore, topic 2 (b) is not applicable to the proposed project or the expanded streetscape variant and is not discussed below.

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

**PROPOSED PROJECT**

Population growth is considered in the context of local and regional plans and their population, housing, and employment projections. Substantial unplanned population growth is considered an increase in population that occurs without consideration of or planning for infrastructure, services, and housing needs to support new residents, employees, and visitors. Generally, a project that increases population is not viewed as having a significant impact on the environment unless the physical changes that would be needed to accommodate the project-related population growth would have adverse impacts on the environment. Project-related employment growth would result in direct physical environmental changes. Aside from noise, air quality, and transportation and circulation, these physical changes are described and analyzed in the various environmental topic sections in this initial study. The EIR will address noise, air quality, and transportation and circulation impacts associated with the physical changes caused by the proposed project.

An indirect environmental impact is a change to the physical environment that is not immediately related to a proposed project. Specifically, indirect project-related population growth includes ways in which a proposed project could foster economic or population growth in other locations or induce the construction of additional housing. Projects that would remove obstacles to population growth (e.g., a major expansion of a wastewater treatment plant or extension of roadways into a previously unserved area) might, for example, allow development to occur in an area that was not previously considered feasible for development because of infrastructure limitations. This type of development pattern typically occurs in

suburban or rural areas adjacent to undeveloped land and is not generally applicable to a site that is in a built urban environment that is already served by existing infrastructure, such as the proposed project site.

***Construction***

Construction of the proposed project is anticipated to occur over approximately 31 months (see Table 4, p. 36). During construction, the total number of temporary/short-term workers is anticipated to range from approximately 2,500 to 3,000. Approximately 400 to 500 workers are expected to travel to the site daily at any given time during peak construction periods. The number of construction workers would vary throughout the construction duration, depending on the specific construction phase. Construction of the proposed project would not cause substantial population growth or a substantial increase in housing demand in the region. It is anticipated that construction employees who are not already living in San Francisco would likely commute from their residences elsewhere in the Bay Area rather than permanently relocate to San Francisco from more distant locations; this is typical for employees in the various construction trades. Therefore, construction of the proposed project would not cause a substantial increase in the population of the city or region.

***Operation***

The proposed project would not involve the construction of residential units that would directly and substantially increase the population in San Francisco. The proposed project would create new employment opportunities through construction of two new multi-story PDR buildings consisting of 1,166,800 gross square feet of PDR uses and 8,400 gross square feet of retail uses. Under the proposed project, an average of up to 1,980 employees would be onsite on a typical day.[38] Prior to commencing the interim use of the project site in 2021, the project site consisted of 438,600 square feet of automotive storage, fleet management, general storage, food-related storage, and temporary storage (Table 1, p. 6). It is estimated that these uses employed 735 workers.[39] Therefore, the proposed project would result in a net increase in employment of 1,242 employees relative to pre-2021 conditions.

The Association of Bay Area Governments and Metropolitan Transportation Commission adopted Plan Bay Area 2050 on October 21, 2021.[40] Plan Bay Area 2050 projects that the Bay Area will add 1.4 million new jobs between 2015 and 2050. Approximately 17 percent of this regional job growth—approximately 236,000 new jobs—is anticipated to occur in San Francisco. Even if new employees relocated to San Francisco as a result of the project, the number of new employees would not be substantial relative to San Francisco's overall employment growth. The increase of 1,242 new employees attributed to the proposed project would represent less than 1 percent of San Francisco's projected employment growth between 2015 and 2050. This increase in employment would not exceed the Association of Bay Area Governments' projections for employment in San Francisco.

In San Francisco's 2019 Jobs Housing Nexus Analysis, San Francisco had an estimated 1.74 workers per household. Based on this number of workers per household, the proposed project's 1,242 new employees

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38 Assumes one employee per 570 gross square feet of PDR space (1,166,800 gross square feet/570 gross square feet = 1,954 employees) and one employee per 370 gross square feet retail space (8,400 gross square feet/370 gross square feet = 23 employees). This employment density is based on a May 2019 report prepared to update the city's nexus fees: Keyser Marston Associates, Jobs Housing Nexus Analysis, San Francisco, May 2019, *https://commissions.sfplanning.org/cpcpackets/2019-011975PCA.pdf*, accessed January 26, 2020.

39 Assumes one employee per 597 gross square feet of PDR space (438,600 gross square feet/597 gross square feet = 735 employees).

40 Association of Bay Area Governments and Metropolitan Transportation Commission, Plan Bay Area 2050, October 2021, https://www.planbayarea.org/sites/default/files/documents/Plan_Bay_Area_2050_October_2021.pdf, accessed December 9, 2021.

would be equivalent to 714 households. The United States Census Bureau's American Community Survey 1-Year estimate for 2019 reports that approximately 78 percent of the employees in the city currently live in San Francisco.[41] Using this percentage, the new households attributed to the proposed project would generate a potential demand for approximately 557 new residential units in San Francisco.

As of May 2021, the California Department of Finance estimates that there were 408,212 housing units in San Francisco and a vacancy rate of 7.8 percent.[42] Additionally, as of the fourth quarter of 2020, the city estimates that 69,453 new housing units are in the development pipeline, of which 5,509 are under construction.[43] The city's existing available housing stock plus the new housing units under construction could accommodate the project's new employee-generated housing demand.

***Extension of Roads and Infrastructure***

The proposed project would not induce substantial population growth indirectly through the extension of roads or other infrastructure. The proposed project consists of redevelopment of two parcels in a core industrial area of San Francisco. The proposed project would not require extensions of existing roadways in the vicinity of the project site such as Toland Street, Rankin Street, Kirkwood Avenue, or McKinnon Avenue. As discussed in Section E.12, Utilities, existing utility infrastructure would have capacity to serve the proposed project, and other than tying into these utilities, no new infrastructure or new extension of existing utility infrastructure is required.

***Conclusion***

In summary, the proposed project would not involve the construction of residential units that would directly increase the population in San Francisco. The overall increase in the number of employees resulting from the proposed project would be consistent with the employment forecasts for San Francisco and would not result in housing demand that would exceed vacant housing units plus housing units currently under construction in San Francisco. In addition, the proposed project would not induce substantial population growth indirectly through the extension of roads or other infrastructure that could support unplanned growth. Therefore, the proposed project would not directly or indirectly induce substantial unplanned population growth in San Francisco, this impact would be less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, intensities, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The variant may result in a relatively small increase in construction personnel to improve streets, sidewalks, and landscaping compared to the proposed project. However, because the proposed expanded streetscape variant would not include new building square footage, involve changes in operations, or require additional employees during operations, it would have the same population and housing impacts as the proposed project and would not directly or indirectly induce substantial unplanned

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41 U.S. Census Bureau 2019 American Community Survey 1-Year. Table S0802, *https://data.census.gov/cedsci/table?t=Commuting%3AEmployment&g=0500000US06075_1600000US0667000&tid=ACSST1Y2019.S0802&hidePreview=false*, accessed October 16, 2020.

42 California Department of Finance, May 2021, E-5 Population and Housing Estimates for Cities, Counties, and the State, *http://www.dof.ca.gov/Forecasting/Demographics/Estimates/e-5/*, accessed November 11, 2021.

43 City of San Francisco, 2020 Q4 Pipeline Report, January 2021, *https://sfplanning.org/project/pipeline-report#current-dashboard*, accessed November 11, 2021.

population growth in San Francisco. This impact would be less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**Impact C-PH-1: The proposed project or variant, in combination with cumulative projects, would result in less-than-significant cumulative impacts related to unplanned population growth. (Less than Significant)**

**PROPOSED PROJECT**

The geographic context for the analysis of cumulative impacts to population and housing is San Francisco. The proposed project would not construct residences but would contribute new PDR employment opportunities in San Francisco. Reasonably foreseeable future employment growth is based on development in the city's pipeline. As of the fourth quarter of 2020, the city estimates that nonresidential development in the city's pipeline could generate 73,288 new employees, inclusive of the proposed project.[44] The proposed project's contribution to citywide employment is 1,242 employees. As of 2019, the United States Census Bureau estimates that San Francisco had 673,488 employees. Therefore, the cumulative number of employees in San Francisco would be 748,018 (i.e., existing employees in 2019, the number of employees generated by development in the city's pipeline, and the employees generated by the proposed project). As stated previously, the Association of Bay Area Governments projects that new development in San Francisco would result in the addition of 236,000 new employees by the year 2050, resulting in a citywide total of 918,000 employees by 2050.[45] Thus, the increase in employment attributed to cumulative development would not exceed the Association of Bay Area Governments' planned employment growth in San Francisco. Therefore, the proposed project in combination with cumulative development projects would not result in unplanned employment growth, cumulative impacts related to employment would be less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, intensities, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. Because the proposed expanded streetscape variant would have the same population and housing impacts as the proposed project, which would not result in unplanned employment growth, the cumulative impacts related to employment would be less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

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[44] City of San Francisco, Citywide Pipeline Report, January 2021, *https://data.sfgov.org/browse?Department-Metrics_Publishing-Department=Planning&category=Housing+and+Buildings&limitTo=datasets&sortBy=newest&tags=pipeline&utf8=%E2%9C%93*, accessed November 11, 2021.

[45] Association of Bay Area Governments and Metropolitan Transportation Commission, Plan Bay Area 2050, October 2021, https://www.planbayarea.org/sites/default/files/documents/Plan_Bay_Area_2050_October_2021.pdf, accessed January 20, 2022.

## E.3. Cultural Resources

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

**Impact CR-1: The proposed project or variant would not cause a substantial adverse change in the significance of a historical resource as defined in section 15064.5, including those resources listed in article 10 or article 11 of the planning code. (No Impact)**

**PROPOSED PROJECT**

As defined in section 15064.5 of the CEQA Guidelines, historical resources (including both built-environment and archeological resources) include properties listed in, or formally determined to be eligible for listing in, the California Register of Historical Resources (California Register) or an adopted local historic register. Historical resources also include resources identified as significant in a historical resource survey and meeting one or more of the following criteria:

- Criterion 1 (Events): Is associated with events that have made a significant contribution to the broad pattern of California's history and cultural heritage;
- Criterion 2 (Persons): Is associated with the lives of persons important in our past;
- Criterion 3 (Architecture): Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of an important creative individual or possesses high artistic values; or
- Criterion 4 (Information Potential): Has yielded, or may be likely to yield, information important to prehistory or history.

Properties that are not listed but otherwise determined to be historically significant, based on substantial evidence, would also be considered historical resources. Furthermore, resources that are listed in or formally determined to be eligible for listing in the National Register of Historic Places are automatically listed in the California Register and are thus considered historical resources for the purposes of CEQA compliance.

Articles 10 and 11 of the planning code pertain to individual city landmarks and historic districts, and to conservation districts in the city's downtown core area (C-3 zoning district), respectively. Article 10 of the planning code sets forth proposals for city landmark designations, with the aid of the National Register of Historic Places criteria in evaluating a resource's historic significance. Article 11, section 1102 of the planning code codifies the criteria for evaluating buildings in the C-3 zoning district of the city.

Baseline existing conditions for historic architectural resources on the project site and in the project vicinity are documented in the Historic Resource Evaluation Report.[46] The subject properties contain four large, one-story, rectangular industrial warehouses, each with their own building number; Buildings 417 and 418 are associated with the 749 Toland Street address; Buildings 427 and 428 are associated with 2000 McKinnon Avenue. The four warehouses were constructed in the early- to mid-1940s as part of the larger Marine Corps Depot. Each building is similar in appearance, being of wood-frame construction set on a concrete slab foundation. All four structures are clad in cement composite corrugated panels, patched with some corrugated metal panels. All of the buildings feature a combination of original (six-over-six wood sash) windows and replacement (aluminum sash) windows, as well as original wood paneled doors with glazing and replacement flush doors. The moderately pitched, side-gable roofs are clad in composite shingles. Many of the pedestrian doors on the façades facing La Salle Avenue are accessed via wooden stairs. Shed-style awnings clad in either asphalt shingles or corrugated plastic sheets cover many of the pedestrian entryways. The four buildings are utilitarian and have no distinct architectural style, according to the Historic Resource Evaluation Report. The planning department's preservation team reviewed the Historic Resource Evaluation Report and the planning department concurred with these findings, as documented in the Preservation Team Review Form.[47]

Additionally, the four warehouses do not appear to be individually historically significant under California Register criteria, nor do they appear to contribute to any known or potential historic districts.[48] Furthermore, the subject properties have not been identified in any of the older San Francisco listings or surveys, including the 1968 Junior League of San Francisco Architectural Survey, Here Today; the 1976 Department of City Planning Architectural Quality Survey; or the 1979 San Francisco Architectural Heritage Survey, Splendid Survivors. Therefore, they are not considered historical resources for the purposes of CEQA.

The project proposes to demolish the four existing buildings on the project site. As discussed above, none of these structures is a historical resource, either individually or as a contributor to a historic district. Because no historic resources would be demolished, destroyed, relocated, or altered, project implementation would have no impact to a historical resource (built environment only) as defined in section 15064.5, including those resources listed in article 10 or article 11 of the planning code. Furthermore, because the project site is not in or immediately adjacent to a listed historic district, the proposed new construction would not adversely affect any historic district listed in article 10 or article 11 of the planning code. No mitigation measures would be required. This topic will not be addressed in the EIR.

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46 ESA, Historic Resource Evaluation Report for 749 Toland Street and 2000 McKinnon Avenue San Francisco, California, report prepared for Prologis, 2018.

47 San Francisco Environmental Planning Department, Preservation Team Review Form, 2018.

48 ESA, Historic Resource Evaluation Report for 749 Toland Street and 2000 McKinnon Avenue San Francisco, California, report prepared for Prologis (page 8) 2018.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. Although the expanded streetscape variant would have a slightly larger footprint than the proposed project, it would not physically alter surrounding structures or substantially modify their setting. Therefore, the expanded streetscape variant would have historical resource impacts similar to those of the proposed project. Similar to the proposed project, the expanded streetscape variant would not adversely affect any historic district listed in article 10 or article 11 of the planning code. No mitigation measures would be required. This topic will not be addressed in the EIR.

**Impact CR-2: The proposed project or variant could cause a substantial adverse change in the significance of an archeological resource pursuant to section 15064.5. (Less than Significant with Mitigation)**

**PROPOSED PROJECT**

As described in section 15064.5 of the CEQA Guidelines, archeological resources can be historical resources. In addition to assessing impacts to archeological resources meeting the requirements for listing as historical resources, impacts to unique archeological resources are also considered under CEQA, as described in section 15064.5, as well as under California Public Resource Code section 21083.2. If an archeological site does not meet the criteria for inclusion on the California Register but does meet the definition of a unique archeological resource as outlined in California Public Resource Code section 21083.2, a project that would materially change the resource in an adverse manner would result in a significant archeological impact. A unique archeological resource implies an archeological artifact, object, or site about which it can be clearly demonstrated that—without merely adding to the current body of knowledge—there is a high probability that it meets one of the following criteria:

- The archeological artifact, object, or site contains information needed to answer important scientific questions, and there is a demonstrable public interest in that information;
- The archeological artifact, object, or site has a special and particular quality, such as being the oldest of its type or the best available example of its type; or
- The archeological artifact, object, or site is directly associated with a scientifically recognized important prehistoric or historic event or person.

A nonunique archeological resource is an archeological artifact, object, or site that does not meet the above criteria. Impacts to nonunique archeological resources and resources that do not qualify for listing on the California Register receive no further consideration under CEQA.

Existing conditions for potential archeological resources in the project area are documented in the project's *Preliminary Archeological Review*.[49] According to the Preliminary Archeological Review, no archeological resources have been previously identified in the project site.[50] The project site has never been previously assessed for archeological resource potential, because the structures currently onsite were constructed

[49] San Francisco Environmental Planning Department, Environmental Planning Preliminary Archeological Review, 2018; rev. 2021.
[50] San Francisco Environmental Planning Department, Environmental Planning Preliminary Archeological Review, 2018, rev. 2021.

prior to the enactment of CEQA (or other federal, state, or local regulations focusing on the management or protection of archeological resources). Therefore, the lack of previously identified archeological resources is not indicative of the archeological sensitivity of the project site.

The Preliminary Archeological Review indicates that one previously identified prehistoric archeological site and one historic site have been recorded within one-quarter mile of the project area.[51] Although no archeological fieldwork has been conducted to date in the project area, the planning department uses a consultant-developed prehistoric archeological sensitivity model, which covers the entire city, as one tool for the assessment of the general archeological sensitivity of project sites.[52] This model is based on landform, geology, proximity to water sources and to known resources, and site history. The archeological sensitivities for both prehistoric and historic-era archeological resources are presented in the Preliminary Archeological Review.

According to the Preliminary Archeological Review, the project site is highly sensitive for near-surface prehistoric resources (that is, on the land surface below any imported fill, as it existed prior to development); moderately sensitive for buried prehistoric resources; and, variably, of very high to very low sensitivity for submerged prehistoric resources. Based on the depth of artificial fill, which geotechnical coring suggests is 14 feet or deeper over most of the project site, the potential for effects to prehistoric resources from project grading and excavation may be low, but the potential for impacts to prehistoric resources from pile installation and soil improvements is high to very high. Although the closest known prehistoric resource is more than 600 feet distant from the project site, the project location is a former bank on an infilled portion of Islais Creek and its estuary; this area would have been highly attractive for prehistoric occupation, except where the main stem of Islais Creek ran across the project site prior to infill.

The Preliminary Archeological Review further states that the potential for historic-period archeological resources to be present in the project site appears to be low, because the current project parcels were not developed until after the mid-twentieth century.[53] Although not reported in the Preliminary Archeological Review, this mid-twentieth century development only occurred after the project vicinity was reclaimed from marshland surrounding Islais Creek, further diminishing the potential for the project site to contain historic-period archeological materials.

Under CEQA Guidelines section 15064.5(b), a significant impact would occur if the project "demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance." As described in the Preliminary Archeological Review, there is a moderate to high potential that deeply buried prehistoric deposits occur below the surface of the project site. More specifically, the Preliminary Archeological Review indicates that project-related soil-disturbing activities, both near the surface and at depth, have the potential to impact prehistoric archeological resources. Submerged resources would consist of prehistoric cultural deposits situated on land surfaces that were exposed and available for human use prior to being inundated by rising sea levels between about 6,000 and 2,000 years ago. Archeological resources are not anticipated on the modern surface, because the project site

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51 San Francisco Environmental Planning Department, Environmental Planning Preliminary Archeological Review, 2018, rev. 2021.

52 Meyer, Jack and Paul Brandy, Far Western Anthropological Research Group, GeoArcheological Assessment and Site Sensitivity Model for the City and County of San Francisco, California, report prepared by Far Western for the Environmental Planning Division of the San Francisco Planning Department, 2019.

53 San Francisco Environmental Planning Department, Environmental Planning Preliminary Archeological Review, 2018.

sits on land reclaimed from bay marshes with imported fill. However, prehistoric resources that lay at the historic surface and along the shores of the marsh lands could be encountered during project excavations.

The proposed project's foundation design would involve concrete spread footings and/or grade beams set on improved and engineered soil, with excavation for the foundations likely to extend 10 feet below existing grade. Typical foundation excavation is expected to extend to 7 feet below grade, with elevator pits and utility trenching extending to 10 feet below existing grade. Although these disturbances are not deep enough to potentially impact deeply buried archeological deposits, they could affect resources buried at shallower depths, depending on the exact depth of twentieth century fill. In addition, it is anticipated that pile foundations would be necessary to support the buildings. Approximately 7,000 25-foot-deep stone columns and approximately 900 60-foot-deep auger-cast piles would be used for the entire site. Each of these auger cast piles would be extended approximately 60 feet below ground surface, and they would be of sufficient depth to potentially impact deeply buried or submerged prehistoric archeological resources. These proposed ground-disturbing construction activities have the potential to alter in an adverse manner the physical characteristics of archeological resources. Therefore, project implementation could result in a substantial adverse change in the significance of an archeological resource pursuant to CEQA guidelines section 15064.5, resulting in a significant impact.

To reduce potentially significant impacts on prehistoric archeological resources, Mitigation Measure M-CR-2 would require the project sponsor to retain the services of an archeologist from the planning department's qualified archeological consultants list to develop and implement an archeological testing program.

**Mitigation Measure M-CR-2** **Archeological Testing.** Based on a reasonable presumption that archeological resources may be present in the project site, the following measures shall be undertaken to avoid any potentially significant adverse effects from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of an archeological consultant from the rotational qualified archeological consultants list maintained by the planning department. After the first project approval action or as directed by the environmental review officer, the project sponsor shall contact the department archeologist to obtain the names and contact information for the next three archeological consultants on the qualified archeological consultants list.

The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the environmental review officer. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the environmental review officer for review and comment and shall be considered draft reports subject to revision until final approval by the environmental review officer. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for a maximum of four weeks. At the direction of the environmental

review officer, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less-than-significant level potential effects on a significant archeological resource as defined in CEQA Guidelines section 15064.5 (a)(c).

**Archeological Testing Program.** The purpose of the archeological testing program shall be to determine to the extent possible the presence or absence of archeological resources and to evaluate whether any archeological resource encountered on the site constitutes an historical resource under CEQA.

The archeological testing program shall be conducted in accordance with the approved archeological testing plan. The archeological consultant and the environmental review officer shall consult on the scope of the archeological testing plan, which shall be approved by the environmental review officer prior to commencing any project-related soils-disturbing activities. The archeological testing plan shall be submitted first and directly to the environmental review officer for review and comment and shall be considered a draft subject to revision until final approval by the environmental review officer. The archaeologist shall implement the testing as specified in the approved archeological testing plan prior to and/or during construction.

The archeological testing plan shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project and lay out what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. The archeological testing plan shall also identify the testing method to be used, the depth or horizonal extent of testing, the locations recommended for testing, and the archeological monitoring requirements for construction soil disturbance, as warranted.

**Paleoenvironmental Analysis of Paleosols.** When a submerged paleosol is identified during the testing program, irrespective of whether cultural material is present, samples shall be extracted and processed for dating, flotation for paleobotanical analysis, and other applicable special analyses pertinent to identification of possible cultural soils and for environmental reconstruction.

**Discovery Treatment Determination.** At the completion of the archeological testing program, the archeological consultant shall submit a written summary of the findings to the environmental review officer. The findings memorandum shall describe and identify each resource and provide

an initial assessment of the integrity and significance of encountered archeological deposits.

If the environmental review officer, in consultation with the archeological consultant, determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, the environmental review officer, in consultation with the project sponsor, shall determine whether preservation of the resource in place is feasible. If so, the proposed project shall be redesigned so as to avoid any adverse effect on the significant archeological resource, and the archeological consultant shall prepare an archeological resource preservation plan, which shall be implemented by the project sponsor during construction. The consultant shall submit a draft archeological resource preservation plan to the planning department for review and approval.

If preservation in place is not feasible, a data recovery program shall be implemented, unless the environmental review officer determines that the archeological resource is of greater interpretive than research significance, and that interpretive use of the resource is feasible. The environmental review officer, in consultation with the archeological consultant, shall also determine whether additional treatment is warranted, which may include additional testing and/or construction monitoring.

**Consultation with Descendant Communities.** On discovery of an archeological site associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group, the environmental review officer and an appropriate representative of the descendant group shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to offer recommendations to the environmental review officer regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the archeological resources report shall be provided to the representative of the descendant group.

**Archeological Data Recovery Plan.** An archeological data recovery program shall be conducted in accordance with an archeological data recovery plan if all three of the following apply: 1) a resource has potential to be significant, 2) preservation in place is not feasible, and 3) the environmental review officer determines that an archeological data recovery program is warranted. The archeological consultant, project sponsor, and environmental review officer shall meet and consult on the scope of the archeological data recovery plan prior to preparation of a draft archeological data recovery plan. The archeological consultant shall submit a draft archeological data recovery plan to the environmental review officer. The

archeological data recovery plan shall identify how the proposed data recovery program shall preserve the significant information the archeological resource is expected to contain. That is, the archeological data recovery plan shall identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.

The scope of the archeological data recovery plan shall include the following elements:

- *Field Methods and Procedures*: descriptions of proposed field strategies, procedures, and operations
- *Cataloguing and Laboratory Analysis*: description of selected cataloguing system and artifact analysis procedures
- *Discard and Deaccession Policy:* description of and rationale for field and post-field discard and deaccession policies
- *Security Measures:* recommended security measures to protect the archeological resource from vandalism, looting, and unintentionally damaging activities
- *Final Report*: description of proposed report format and distribution of results
- *Curation:* description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities

**Coordination of Archaeological Data Recovery Investigations.** In cases in which the same resource has been or is being affected by another project for which data recovery has been conducted, is in progress, or is planned, to maximize the scientific and interpretive value of the data recovered from both archeological investigations, the following measures shall be implemented:

A) In cases where neither investigation has yet begun, both archeological consultants and the environmental review officer shall consult on coordinating and collaboration on archeological research design, data recovery methods, analytical methods, reporting, curation and

interpretation to ensure consistent data recovery and treatment of the resource.

B) In cases where archeological data recovery investigation is already underway or has been completed for a prior project, the archeological consultant for the subsequent project shall consult with the archeological consultant for the prior project, if available; review prior treatment plans, findings, and reporting; inspect and assess existing archeological collections/inventories from the site prior to preparation of the archaeological treatment plan for the subsequent discovery; and incorporate prior findings in the final report of the subsequent investigation. The objectives of this coordination and review of prior methods and findings shall be to identify refined research questions; determine appropriate data recovery methods and analyses; assess new findings relative to prior research findings; and integrate prior findings into subsequent reporting and interpretation.

**Human Remains and Funerary Objects.** The treatment of any human remains and funerary objects discovered during any soils-disturbing activity shall comply with applicable state laws, including Section 7050.5 of the Health and Safety Code and Public Resources Code 5097.98. If human remains or suspected human remains are encountered during construction, the contractor and project sponsor shall ensure that ground-disturbing work within 50 feet of the remains is halted immediately and shall arrange for the protection in place of the remains until appropriate treatment and disposition have been agreed upon and implemented in accordance with this section. Upon determining that the remains are human, the project archeologist shall immediately notify the city's Medical Examiner of the find. The archeologist shall also immediately notify the environmental review officer and the project sponsor of the find. In the event of the Medical Examiner's determination that the human remains are Native American in origin, the Medical Examiner shall notify the California State Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall immediately appoint and notify a most likely descendant. The most likely descendant shall complete his or her inspection of the remains and make recommendations or preferences for treatment within 48 hours of being granted access to the site.

If the remains cannot be permanently preserved in place, the land owner may consult with the project archeologist, project sponsor, and CEQA lead agency and shall consult with the most likely descendant on recovery of the remains and any scientific treatment alternatives. The land owner shall then make all reasonable efforts to develop a burial agreement with the most likely descendant, as expeditiously as possible, for the treatment and disposition, with appropriate dignity, of human remains and funerary objects (as detailed in CEQA Guidelines section 15064.5(d)). In accordance

with Public Resources Code 5097.98 (c)(1), the burial agreement shall address, as applicable and to the degree consistent with the wishes of the most likely descendant, the appropriate excavation, removal, recordation, scientific analysis, custodianship prior to reinterment or curation, and final disposition of the human remains and funerary objects. If the most likely descendant agrees to scientific analyses of the remains and/or funerary objects, the archeological consultant shall retain possession of the remains and funerary objects until completion of any such analyses, after which the remains and funerary objects shall be reinterred or curated as specified in the burial agreement.

Both parties are expected to make a concerted and good faith effort to arrive at an agreement, consistent with the provisions of Public Resources Code 5097.98. However, if the land owner and the most likely descendant are unable to reach an agreement, the land owner, environmental review officer, and project sponsor shall ensure that the remains and/or mortuary materials are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity, in a location not subject to further or future subsurface disturbance, consistent with state law.

Treatment of historic-period human remains and/or funerary objects discovered during any soil-disturbing activity shall be in accordance with protocols laid out in the project archeological treatment document, and other relevant agreements established between the project sponsor, Medical Examiner, and environmental review officer. The project archeologist shall retain custody of the remains and associated materials while any scientific study scoped in the treatment document is conducted, after which the remains shall be curated or respectfully reinterred by arrangement on a case-by case-basis.

**Archeological Public Interpretation Plan.** The project archeological consultant shall submit an archeological public interpretation plan if a significant archeological resource is discovered during a project. If the resource to be interpreted is a tribal cultural resource, the archeological public interpretation plan shall be prepared in consultation with and developed with the participation of tribal representatives, including the Association of Ramaytush Ohlone and other interested Ohlone parties. The archeological public interpretation plan shall describe the interpretive product(s), locations or distribution of interpretive materials or displays, the proposed content and materials, the producers or artists of the displays or installation, and a long-term maintenance program. The archeological public interpretation plan shall be sent to the environmental review officer

for review and approval. The archeological public interpretation plan shall be implemented prior to occupancy of the project.

**Archeological Resources Report.** Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the testing program to the environmental review officer. The archeological consultant shall submit a draft archeological resources report to the environmental review officer that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken, and if applicable, discusses curation arrangements. Formal site recordation forms (CA DPR 523 series) shall be attached to the archeological resources report as an appendix.

Once approved by the environmental review officer, copies of the archeological resources report shall be distributed as follows: California Archeological Site Survey Northwest Information Center shall receive one copy, and the environmental review officer shall receive a copy of the transmittal of the archeological resources report to the Northwest Information Center. The environmental planning division of the planning department shall receive one bound hardcopy of the archeological resources report. Digital files that shall be submitted to the environmental division include an unlocked, searchable PDF version of the archeological resources report, GIS shapefiles of the site and feature locations, any formal site recordation forms (CA DPR 523 series), and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. The PDF archeological resources report, GIS files, recordation forms, and/or nomination documentation should be submitted via USB or other stable storage device. If a descendant group was consulted during archeological treatment, a PDF of the archeological resources report shall be provided to the representative of the descendant group.

**Curation.** Significant archeological collections and paleoenvironmental samples of future research value shall be permanently curated at an established curatorial facility. The facility shall be selected in consultation with the environmental review officer. Upon submittal of the collection for curation, the sponsor or archeologist shall provide a copy of the signed curatorial agreement to the environmental review officer.

***Significance after Mitigation.*** The project sponsor has agreed to implement Mitigation Measure M-CR-2: Archeological Testing. This measure would ensure that archeological resources that may be present in soils that would be disturbed by project construction would be identified and assessed. If a significant resource is present, the resource would be preserved in place or archeological data recovery would be carried out to preserve the important information it represents. With implementation of this measure, the potentially

significant impact to archeological resources would be reduced to a less-than-significant level. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, excavation and foundation work, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would have archeological impacts similar to those of the proposed project, but would include a slightly larger footprint. Within the expanded footprint, additional ground disturbance would occur where the streetscape improvements would be completed; such disturbances would extend approximately 3 feet below the ground surface. Similar to the proposed project, under the expanded streetscape variant, the project sponsor would be required to implement Mitigation Measure M-CR-2: Archeological Testing. With implementation of this measure for the expanded streetscape variant footprint, the potentially significant impact to archeological resources would be reduced to a less-than-significant level. This topic will not be addressed in the EIR.

**Impact CR-3 The proposed project or variant could disturb human remains including those interred outside of formal cemeteries. (Less than Significant with Mitigation)**

**PROPOSED PROJECT**

No known human burials have been identified in the study area. However, the possibility cannot be discounted that human remains could be inadvertently disturbed during project excavations and pile extension activities in the project site, given the elevated sensitivity for the area to contain near-surface and deeply buried and submerged prehistoric resources. Therefore, project implementation could result in impacts on previously undiscovered human remains, including those interred outside of formal cemeteries, during ground-disturbing activities. If human remains are discovered during construction, this would be considered a significant impact. Implementation of Mitigation Measure M-CR-2: Archeological Testing, would ensure that if human remains are encountered during construction, they would be appropriately addressed and that respectful treatment and disposition would occur.

***Significance after Mitigation***

The project sponsor has agreed to implement Mitigation Measure M-CR-2: Archeological Testing. This measure would ensure that the treatment of human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activity complies with applicable state and federal laws. This shall include immediate notification of the city's Medical Examiner and adherence to protocols laid out in the project's archaeological treatment documents. With implementation of these measures, the potentially significant impact to human remains would be reduced to a less-than-significant level. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, excavation and foundation work, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would have archeological impacts similar to those of the proposed project, but would include a slightly larger footprint. Within the expanded footprint, additional ground disturbance would occur where the streetscape improvements would be completed; such disturbances would extend approximately 3 feet below the ground surface.

Similar to the proposed project, under the expanded streetscape variant, the project sponsor would be required to implement Mitigation Measure M-CR-2: Archeological Testing. With implementation of this measure, the potentially significant impact to human remains would be reduced to a less-than-significant level. This topic will not be addressed in the EIR.

**Impact C-CR-1: The proposed project or variant, in combination with cumulative projects, could result in cumulative cultural resource impacts. (Less than Significant with Mitigation)**

**PROPOSED PROJECT**

As presented in Impact CR-1, project implementation would have no impact to historical resources of the built environment (i.e., historic architecture). Therefore, the proposed project would not contribute to cumulative impacts on this class of historical resources, and the proposed project would have no cumulative impact on historical resources of the built environment.

The geographic context for cumulative impacts to archeological resources and human remains is generally confined to projects that are close enough to the proposed project site that they could result in impacts to the same archaeological resources. The SF Market Project is adjacent to the project site, and the Quint-Jerrold Connector, 2270 McKinnon Avenue, the SFPUC Biosolids Digester projects are within approximately 500 feet. These are the only cumulative development projects that could affect the same archaeological resources as the proposed project.

Implementation of the proposed project has the potential to result in significant impacts to as-yet undiscovered buried archeological resources and to human remains, although no archeological resources or human remains are known to be present at the project site. The immediate project vicinity is similarly moderately to very highly sensitive for the presence of buried prehistoric archeological resources and human remains: although there are no known resources in the immediate vicinity, there is a known prehistoric site approximately 600 feet away. If a resource were found to be present at the project site, it is possible that its extent could include the adjacent project site, which is where the SF Market project is proposed. The SF Market project involves excavation for all project phases. In the event that both projects impact an archaeological resource during construction, a significant cumulative impact to the resource could occur. Under these circumstances, the proposed project and the SF Market could result in significant cumulative impacts on archaeological resources or human remains, and the project's impact could be cumulatively considerable. However, the project's potential impacts would be reduced to a less-than-significant level with implementation of Mitigation Measure M-CR-2: Archeological Testing, above.[54] Implementation of these measures would ensure that the proposed project's contribution to the significant cumulative impact on archeological resources and human remains would not be cumulatively considerable. Therefore, cumulative impacts to archeological resources and human remains would be less than significant with mitigation. It is noted that the SF Market Project mitigated negative declaration and SFPUC Biosolids Digester Facilities Project EIR include mitigation measures requiring archaeological testing, monitoring, and data recovery similar to Mitigation Measure M-CR-2 for the proposed project.

[54] San Francisco Planning Department, San Francisco Wholesale Produce Market Project Mitigated Final Negative Declaration, Case No. 2009.1153E, July 2011, *https://archives.sfplanning.org/documents/8783-2009.1153E_SFWholesaleProduceMarketFMND.pdf*, accessed June 17, 2020.

*Significance after Mitigation*

Compliance with the procedures identified in Mitigation Measure M-CR-2 would ensure that in the event archeological resources or human remains are discovered on the project site, the important information they represent would be preserved and interpreted to the public. This would ensure that the project's contribution to a significant cumulative archeological and human remains impact would not be cumulatively considerable, resulting in a less-than-significant impact with mitigation.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, excavation and foundation work, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would have archeological impacts similar to those of the proposed project, but would include a slightly larger footprint. Within the expanded footprint, additional ground disturbance would occur where the streetscape improvements would be completed; such disturbances would extend approximately 3 feet below the ground surface. As presented in Impact CR-1, implementation of the expanded streetscape variant would have no impact to historical resources of the built environment (i.e., historic architecture). Therefore, the expanded streetscape variant would not contribute to cumulative impacts on historic architectural resources and would have no cumulative impact on historical resources of the built environment.

Similar to the proposed project, under the expanded streetscape variant, the project sponsor would be required to implement Mitigation Measure M-CR-2: Archeological Testing. With implementation of this measure, the expanded streetscape variant's contribution to a significant cumulative archeological and human remains impact would not be cumulatively considerable, resulting in a less-than-significant impact with mitigation. This topic will not be addressed in the EIR.

## E.4. Tribal Cultural Resources

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

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

**PROPOSED PROJECT**

Public Resources Code section 21074.2 requires the lead agency to consider the effects of a project on tribal cultural resources. As defined in section 21074, tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are listed, or determined to be eligible for listing, in a national, state, or local register of historical resources. Pursuant to Assembly Bill (AB) 52 (Public Resources Code section 21080.3.1(d)), on October 17, 2019, the planning department contacted Native American individuals and organizations for the San Francisco area, providing a description of the project and requesting comments on the identification, presence, and significance of tribal cultural resources in the project vicinity.[55] During the 30-day comment period, no Native American tribal representatives contacted the planning department to request consultation.

[55] San Francisco Planning Department, Tribal Notification Regarding Tribal Cultural Resources and CEQA, San Francisco Gateway Project, October 17, 2019.

As discussed in Section E.3, Cultural Resources, there is a moderate to high potential that prehistoric archeological resources may be present, buried below the surface of the project site. Based on prior Native American consultation under AB 52, all archeological sites of Native American origin in San Francisco, including all prehistoric archeological sites, are considered to be potential tribal cultural resources. If tribal cultural resources are disturbed during project implementation (i.e., through project excavations or pile extension), this would be considered a significant impact. This impact would be mitigated to a less-than-significant level with implementation of Mitigation Measure M-CR-2: Archeological Testing (presented in Section E.3, Cultural Resources), which requires implementation of an archeological testing program; and Mitigation Measure M-TCR-1: Tribal Cultural Resources Interpretive Program, described below.

**Mitigation Measure M-TCR-1 Tribal Cultural Resources Interpretive Program.**

**Preservation in Place.** In the event of the discovery of an archeological resource of Native American origin, the environmental review officer, the project sponsor, and the local Native American representative shall consult to determine whether preservation in place would be feasible and effective. Coordination shall take place with local Native American representatives, including the Association of Ramaytush Ohlone and other interested Ohlone parties. If it is determined that preservation-in-place of the tribal cultural resource would be both feasible and effective, then the archeological consultant, in consultation with the local Native American representative, shall prepare an archeological resource preservation plan, which shall be implemented by the project sponsor during construction. The consultant shall submit a draft archeological resource preservation plan to the planning department for review and approval.

**Interpretive Program.** If the environmental review officer, in consultation with local Native American representatives (including the Association of Ramaytush Ohlone and other interested Ohlone parties) and the project sponsor, determines that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option, then archeological data recovery shall be implemented as required by the environmental review officer and in consultation with affiliated Native American tribal representatives.

After data recovery, the project sponsor, in consultation with local Native American representatives, shall prepare a tribal cultural resources interpretation plan to guide the interpretive program. The tribal cultural resources interpretation plan may be prepared in tandem with the archeological public interpretation plan described in Mitigation Measure M-CR-2: Archeological Testing. The tribal cultural resources interpretation plan shall be submitted to the environmental review officer for review and approval prior to implementation of the program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a

long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, cultural displays, educational panels, or other interpretive elements agreed upon by the environmental review officer, sponsor, and local Native American representatives. Upon approval of the tribal cultural resources interpretation and prior to project occupancy, the interpretive program shall be implemented by the project sponsor. Local Native American representatives who are substantially involved in preparation or implementation of the interpretive program shall be appropriately compensated by the project sponsor.

***Significance after Mitigation.*** Mitigation Measure M-CR-2: Archeological Testing (presented in Section E.3, Cultural Resources) would ensure that archeological resources that may be present in soils that would be disturbed by project construction would be identified and assessed. In the event that archeological resources are found, they would be assessed to determine whether they constitute significant tribal cultural resources in accordance with Mitigation Measure M-TCR-1. Preservation in place is the preferred mitigation for tribal cultural resources. However, if it is determined, through the process outlined above in Mitigation Measure M-TCR-1, that preservation in place is not feasible, archeological data recovery would recover a sample of the significant information represented by the resource and public interpretation would help to ensure that the other values represented by the resource are conveyed to the public. Mitigation Measures M-CR-2 and M-TCR-1 therefore would reduce the potential impact to tribal cultural resources to a less-than-significant level. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, excavation and foundation work, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The proposed expanded streetscape variant would have tribal cultural resources impacts similar to those of the proposed project, but would include a slightly larger footprint. Within the expanded footprint, additional ground disturbance would occur where the streetscape improvements would be completed; such disturbances would extend approximately 3 feet below the ground surface. Similar to the proposed project, under the expanded streetscape variant, the project sponsor would be required to implement Mitigation Measures M-CR-2: Archeological Testing; and M-TCR-1: Tribal Cultural Resources Interpretive Program. With implementation of these measures, the potentially significant impact to tribal cultural resources would be reduced to a less-than-significant level. This topic will not be addressed in the EIR.

**Impact C-TCR-1: The proposed project or variant, in combination with cumulative projects, could result in cumulative cultural resource impacts. (Less than Significant with Mitigation)**

**PROPOSED PROJECT**

The geographic context for cumulative tribal cultural resources impacts is generally confined to projects in the immediate vicinity of the project site that might affect resources that also could be affected by the project. As discussed under Impact C-CR-1, the SF Market Project is adjacent to the project site and would involve excavation for all project phases; and the Quint-Jerrold Connector, 2270 McKinnon Avenue, and SFPUC Biosolids Digester projects are within 500 feet. These are the only cumulative development projects

that could affect prehistoric archeological resources and potential tribal cultural resources that could also be affected by the proposed project.

As presented under Impact TCR-1, implementation of the proposed project has the potential to result in significant impacts to buried archeological resources, because this area of San Francisco is considered moderately to highly sensitive for the presence of buried prehistoric archeological resources. Such prehistoric archeological resources could also be tribal cultural resources, as explained above. Although no such resources are known at the project site and the closest known site is about 400 feet distant, construction activities at project sites in the immediate vicinity would have a similar potential to that of the project to result in significant impacts to buried prehistoric archeological resources that also may be tribal cultural resources. In this situation, a significant cumulative impact could occur. In the event of the discovery during construction of an archaeological resource that is determined to be a tribal cultural resource, the project's contribution to the cumulative impact would be cumulatively considerable.

However, if the proposed project were to encounter buried archeological resources that include tribal cultural resources, impacts to these resources would be addressed with implementation of Mitigation Measure M-CR-2: Archeological Testing (see Section E.3, Cultural Resources); and Mitigation Measure M-TCR-1: Tribal Cultural Resources Interpretive Program, above. With implementation of these mitigation measures, the proposed project's contribution to cumulative impacts on tribal cultural resources would be mitigated to a less-than-cumulatively-considerable level. Therefore, cumulative impacts on tribal cultural resources would be less than significant with mitigation. It is noted that other nearby projects are subject to the same or similar measures that, in each case, would mitigate each project's impacts to tribal cultural resources to a less-than-significant level.

***Significance after Mitigation***

Compliance with the procedures identified in Mitigation Measures M-CR-2 and M-TCR-1 would ensure that, if significant tribal cultural resources are discovered, the important values and information represented by these significant tribal cultural resources would be preserved and/or interpreted to the public in consultation with the affiliated Native American tribal representatives. This would reduce the proposed project's contribution to potentially significant cumulative impacts on these tribal cultural resources to a less-than-significant level.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, excavation and foundation work and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. Therefore, the expanded streetscape variant would have tribal cultural resources impacts similar to those of the proposed project, but would include a slightly larger footprint. Within the expanded footprint, additional ground disturbance would occur where the streetscape improvements would be completed; such disturbances would extend approximately 3 feet below the ground surface. Similar to the proposed project, under the expanded streetscape variant, the project sponsor would be required to implement Mitigation Measures M-CR-2: Archeological Testing; and M-TCR-1: Tribal Cultural Resources Interpretive Program. With implementation of these measures, the expanded streetscape variant would reduce the proposed project's contribution to potentially significant cumulative impacts on these tribal cultural resources to a less-than-significant level.

## E.5. Transportation and Circulation

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

The proposed project and the expanded streetscape variant have the potential to result in significant impacts on transportation and circulation. Accordingly, this topic will be analyzed further and included in the EIR.

## E.6. Noise

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

There are no private airstrips or public or public use airports in the project vicinity, and the project is not in the vicinity of an airport land use plan. Therefore, topic 6 (c) is not applicable to the proposed project or expanded streetscape variant. However, the proposed project and expanded streetscape variant have the potential to result in significant temporary or permanent noise and vibration impacts. Accordingly, this topic, with the exception of exposing people residing or working near an airstrip or airport to excessive noise, will be analyzed further and included in the EIR.

## E.7. Air Quality

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

The proposed project and expanded streetscape variant have the potential to result in significant impacts on air quality. Accordingly, this topic will be analyzed further and included in the EIR.

## E.8. Greenhouse Gas Emissions

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

**SETTING**

Gases that trap heat in the atmosphere are referred to as greenhouse gases because they capture heat radiated from the sun as it is reflected back into the atmosphere. The accumulation of greenhouse gases from human activities contributes to global climate change. The primary greenhouse gases, or climate pollutants, are carbon dioxide, methane, nitrous oxide, ozone, and water vapor. In addition to these primary gases, black carbon is a part of fine particulate air pollution and not a gas, but is an important climate pollutant.

Individual projects contribute to the cumulative effects of climate change by emitting greenhouse gases during demolition, construction, and operation. Emissions of carbon dioxide are largely by-products of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices and landfills. Black carbon has been identified as a major contributor to global climate change, possibly second only to carbon dioxide. Human activities produce black carbon as a result of the incomplete combustion of fossil fuels, biofuels, and biomass materials.[56] Nitrous oxide is a by-product of various industrial processes. Other greenhouse gases, including hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, are generated in certain industrial processes. Greenhouse gases are typically reported in "carbon-dioxide-equivalent" measures.[57]

It is unequivocal that human-caused increases in greenhouse gases have warmed the atmosphere, ocean, and land, and that human-induced climate change is affecting every inhabited region in the world, increasing the frequency and severity of extreme events, such as heat waves, precipitation, droughts, and tropical cyclones. Furthermore, the scale of changes observed across the climate system is unprecedented in the thousands of years for which we have data.[58] Secondary effects of climate change in California include impacts on agriculture, the state's electricity system, and the native ecosystems and biodiversity (especially

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56 Center for Climate and Energy Solutions, *What Is Black Carbon?* April 2010, *https://www.c2es.org/site/assets/ uploads/2010/04/what-is-black-carbon.pdf*, accessed November 19, 2019.

57 Because of the differential potential of various greenhouse gases to trap heat in the Earth's atmosphere, greenhouse gas emissions are frequently measured in "carbon dioxide equivalents," which present a weighted total, based on each gas's heat trapping (or "global warming") potential relative to that of carbon dioxide.

58 Intergovernmental Panel on Climate Change, *Climate Change 2021: The Physical Science Basis*, *Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change*, *https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_SPM.pdf*, accessed October 25, 2021.

those of freshwater and anadromous fish); increasing vulnerability of infrastructure (including levees, such as in the Sacramento-San Joaquin Delta); an increase in the frequency and intensity of extreme wildfires, flooding events, and drought conditions; and changes in disease vectors.[59,60]

### EXISTING GREENHOUSE GAS EMISSION ESTIMATES

The California Air Resources Board (air board) estimated that in 2019, California produced about 418 million gross metric tons of carbon dioxide equivalents.[61] The air board found that transportation is the source of 40 percent of the state's greenhouse gas emissions, followed by industrial uses at 21 percent, and electricity generation (both in-state and outside generation) at 14 percent. Commercial and residential fuel use (primarily for heating) accounted for 10 percent of greenhouse gas emissions.[62] In San Francisco, motorized transportation and buildings (i.e., natural gas and electricity use in the buildings) were the two largest sources of greenhouse gas emissions, accounting for 47 percent (approximately 2.2 million metric tons of carbon dioxide equivalents) and 41 percent (1.9 million metric tons of carbon dioxide equivalents), respectively, of the approximately 4.6 million metric tons of carbon dioxide equivalents emitted in San Francisco in 2019.[63] Other sources include landfilled organics (approximately 7 percent), municipal emissions (approximately 3 percent, including both municipal buildings and fleets), and agriculture (approximately 1.8 percent).[64]

Electricity in San Francisco is provided primarily by SFPUC and Pacific Gas and Electric Company (PG&E). In 2019, electricity consumption in San Francisco totaled approximately 5.6 million megawatt-hours.[65] SFPUC produces approximately 80 percent of the City of San Francisco's power through Hetch Hetchy Power and CleanPowerSF, with the City's remaining energy demand being met by PG&E. CleanPowerSF was launched by the SFPUC in 2016 to provide renewable energy to residents and businesses. The organization was formed to achieve the city's ambitious targets regarding the delivery of completely emissions-free electricity by 2030.[66] PG&E's 2019 power mix was as follows: 2 percent natural gas and other, 45 percent nuclear, 25 percent eligible renewables (described below), and 28 percent large hydroelectric.[67]

SFPUC, which operates three hydroelectric power plants as part of San Francisco's Hetch Hetchy water supply system—as well as solar, biomass, and biowaste infrastructure—provides electrical power to the San

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59 Ibid.

60 California Climate Change Center, *California's Fourth Climate Change Assessment: Statewide Summary Report*, *https://www.energy.ca.gov/sites/default/files/2019-11/Statewide_Reports-SUM-CCCA4-2018-013_Statewide_Summary_Report_ADA.pdf*, accessed January 5, 2022.

61 California Air Resources Board, *California Greenhouse Gas Inventory for 2000–2019 by Category as Defined in the Scoping Plan,* n.d., *https://www.arb.ca.gov/cc/inventory/data/data.htm*, accessed August 20, 2021.

62 Ibid.

63 San Francisco Department of the Environment, *San Francisco's Carbon Footprint*, n.d., *https://sfenvironment.org/carbonfootprint*, accessed August 20, 2021.

64 Ibid.

65 California Energy Commission, *Electricity Consumption by County*, 2019, *https://ecdms.energy.ca.gov/ elecbycounty.aspx*, accessed August 20, 2021.

66 Stark, Kevin, Power Switch: S.F. Builds Case for Pushing Out PG&E, *San Francisco Public Press,* 2019, *https://sfpublicpress.org/news/2019-06/power-switch-sf-builds-case-for-pushing-out-pge*, accessed November 20, 2019.

67 Pacific Gas and Electric Company, *Exploring Clean Energy Solutions,* 2019, *https://www.pge.com/en_US/about-pge/environment/what-we-are-doing/clean-energy-solutions/clean-energy-solutions.page?WT.mc_id=Vanity_ cleanenergy*, accessed November 19, 2019.

Francisco Municipal Railway, city buildings, and a limited number of commercial accounts in San Francisco.[68] Electricity generated by the Hetch Hetchy system achieves net-zero greenhouse gas emissions.[69]

## REGULATORY SETTING

This section describes the regulatory framework for greenhouse gases, including policies and regulations applicable to greenhouse gas emissions.

### *Greenhouse Gas Reduction Goals*

At the state level, Executive Order S-3-05[70] sets forth a series of target dates by which time statewide emissions of greenhouse gases would need to be progressively reduced, as follows:

- reduce emissions to 1990 levels by 2020 (approximately 427 million metric tons of carbon dioxide equivalents), and
- reduce emissions to 80 percent below 1990 levels by 2050 (approximately 85 million metric tons of carbon dioxide equivalents).

In 2006, after Executive Order S-3-05 was signed, the California Legislature passed AB 32,[71] also known as the California Global Warming Solutions Act. AB 32 requires the air board to design and implement emission limits, regulations, and other measures so that statewide greenhouse gas emissions are reduced to 1990 levels by 2020.

Pursuant to AB 32, the air board adopted the 2008 climate change scoping plan, which outlines measures to meet the 2020 greenhouse gas reduction limits. To meet the goals of AB 32, California needed to reduce its greenhouse gas emissions to 1990 levels by 2020 (equal to approximately 15 percent below 2008 levels).[72] In 2018, the air board announced that inventory year 2016 emissions had dropped below 1990 levels, which represented early achievement of the AB 32 goal.[73] Since inventory year 2016, emissions have continued to be below the 1990 level.[74]

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68 San Francisco Public Utilities Commission, *About the Power Enterprise*, n.d., *http://sfwater.org/index.aspx?page=391*, accessed November 18, 2019.

69 California Air Resources Board. 2020. Mandatory GHG Reporting – 2019 GHG Emissions Data, *https://ww2.arb.ca.gov/mrr-data*, accessed October 12, 2021.

70 Office of the Governor, *Executive Order S-3-05*, June 1, 2005, *http://static1.squarespace.com/static/549885d4e4b0ba0bff5dc695/t/54d7f1e0e4b0f0798cee3010/1423438304744/California+Executive+Order+S-3-05+(June+2005).pdf*, accessed November 20, 2019. Executive Order S-3-05 sets forth a series of target dates by which statewide emissions of greenhouse gases will need to be progressively reduced, as follows: by 2010, reduce greenhouse gas emissions to 2000 levels (approximately 457 million metric tons of carbon dioxide equivalents); by 2020, reduce greenhouse gas emissions to 1990 levels (approximately 427 million metric tons of carbon dioxide equivalents); and by 2050, reduce greenhouse gas emissions to 80 percent below 1990 levels (approximately 85 million metric tons of carbon dioxide equivalents).

71 California Health and Safety Code division 25.5, section 38500 et seq.

72 California Air Resources Board, *AB 32 Global Warming Solutions Act of 2006*, *https://ww2.arb.ca.gov/resources/fact-sheets/ab-32-global-warming-solutions-act-2006*, accessed September 30, 2021.

73 California Air Resources Board, Climate pollutants fall below 1990 levels for the first time, 2018, *https://ww2.arb.ca.gov/news/climate-pollutants-fall-below-1990-levels-first-time*, accessed April 23, 2020.

74 California Air Resources Board, *California Greenhouse Gas Inventory for 2000–2019 by Category as Defined in the Scoping Plan,* n.d., *https://www.arb.ca.gov/cc/inventory/data/data.htm*, accessed August 20, 2021.

For the 2030 horizon, Executive Order B-30-15, signed in 2015, sets an interim statewide greenhouse gas emissions reduction target of 40 percent below 1990 levels by 2030.[75] Executive Order B-30-15 also requires all state agencies with jurisdiction over sources of greenhouse gas emissions to implement measures within their statutory authority for achieving reductions in greenhouse gas emissions and meeting the 2030 and 2050 greenhouse gas emission reduction targets.

On August 24, 2016, the California Legislature passed Senate Bill (SB) 32,[76] thereby amending the California Global Warming Solutions Act of 2006. SB 32 directed the air board to adopt, to the extent technologically feasible and cost effective, the rules and regulations necessary to achieve a reduction in statewide greenhouse gas emissions (i.e., to 40 percent below 1990 levels by 2030). The passage of SB 32 codified the 2030 interim greenhouse gas emissions reduction target established by Executive Order B-30-15.

SB 32 was paired with AB 197 (2016), which amended the health and safety code.[77] AB 197 provides additional guidance on how to achieve the reduction targets established in Executive Order B-30-15 and SB 32. SB 32 and AB 197 became effective January 1, 2017.

In accordance with AB 32, the climate change scoping plan must be updated every five years to evaluate AB 32 policies and ensure that California is on track with respect to achieving long-term climate stabilization goals. The first scoping plan update was approved in 2014, and an additional update was approved in 2017.

The 2017 climate change scoping plan identifies specific measures to reduce greenhouse gas emissions to 1990 levels by 2020 and requires the air board and other state agencies to develop and enforce regulations and other initiatives for reducing greenhouse gases.[78] The plan also highlights California's progress toward meeting the 2030 greenhouse gas emissions reduction goals of SB 32 and evaluates how to align the state's longer-term greenhouse gas reduction strategies with other state policy priorities for water, waste, natural resources, clean energy, transportation, and land use.[79] Specifically, the 2017 climate change scoping plan update articulates a key role for local governments, recommending that they establish greenhouse gas reduction goals for both their municipal operations and the community consistent with those of the state.

The 2017 climate change scoping plan estimates 385 million metric tons (MMT) of carbon dioxide equivalents ($CO_2e$) would be reduced from known commitments, leaving a gap of 236 MMT $CO_2e$ that is needed to meet the 2030 target codified by SB 32. The air board concluded that the gap in emissions would need to be bridged by the cap-and-trade program's achievement of 236 MMT $CO_2e$. Table 5 shows the reductions that the air board is expecting from the known commitments of the scoping plan and the amount needed from the cap-and-trade program to achieve the 2030 target.[80]

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75 Office of the Governor, *Executive Order B-30-15,* April 29, 2015, *https://www.ca.gov/archive/gov39/2015/04/29/news18938/index.html*, accessed November 19, 2019.

76 California Health and Safety Code division 25.5, section 38566.

77 California Government Code, division 2 of title 2, article 7.6 of chapter 1.5, California Health and Safety Code sections 39510, 39607, 38506, 38531, and 38562.5.

78 California Air Resources Board, *California's 2017 Climate Change Scoping Plan*, November 2017, *https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf*, accessed March 17, 2020.

79 Ibid.

80 Ibid.

## Table 5 Cumulative Greenhouse Gas Reductions from the 2017 Scoping Plan Measures[81]

| Scoping Plan Measure | Greenhouse Gas Reductions (MMT $CO_2e$) |
|---|---|
| Short-lived climate pollutants | 217 |
| Mobile sources, clean fuels, and technology and freight | 64 |
| Landfill methane energy efficiency | 64 |
| Biofuels | 25 |
| 50% renewable portfolio standards | 16 |
| Cap-and-trade program | 236 |
| **Total Scoping Plan Reductions to Meet SB 32 Target** | **621** |

Source: California Air Resources Board 2017.

Notes:

The values displayed in Table 5 do not mathematically sum to 621 MMT CO2e, as a result of embedded significant figures and rounding for graphic display purposes included in California's 2017 Climate Change Scoping Plan.

$CO_2e$ = carbon dioxide equivalents
MMT = million metric tons

For the post-2030 period, Executive Order B-55-18 establishes a statewide goal of achieving carbon neutrality as soon as possible, but no later than 2045, and achieving and maintaining net negative emissions thereafter. The next update to the scoping plan, the 2022 climate change scoping plan, would assess progress toward achieving the SB 32 2030 target and laying out a path to achieve carbon neutrality by mid-century, pursuant to Executive Order B-55-18.[82]

At the regional level, the air district is responsible for attaining and maintaining federal and state air quality standards in the San Francisco Bay Area Air Basin, as established by the federal Clean Air Act and the California Clean Air Act. The acts require plans to be developed for areas that do not meet air quality standards. The most recent air quality plan, the Bay Area 2017 Clean Air Plan, includes a goal that calls for reducing greenhouse gas emissions to 1990 levels by 2020, 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050.[83] The air district also established a climate protection program to reduce pollutants that contribute to global climate change and affect air quality in the air basin.[84] In addition, the air district's CEQA Air Quality Guidelines help lead agencies comply with the requirements of CEQA with respect to potentially adverse impacts on air quality. The air district advises lead agencies to consider adopting a greenhouse gas emissions reduction strategy that meets climate stabilization goals and then review projects for compliance with the greenhouse gas emissions reduction strategy as a CEQA threshold of significance.[85] This is consistent with the approach to analyzing greenhouse gas emissions described in CEQA Guidelines section 15183.5.

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81 California Air Resources Board, *California's 2017 Climate Change Scoping Plan,* November 2017, *https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf*, accessed September 3, 2021.

82 California Air Resources Board, *AB 32 Climate Change Scoping Plan*, *https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan*, accessed October 12, 2021.

83 Bay Area Air Quality Management District, 2017 Clean Air Plan, April 2017, http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans, accessed November 19, 2019.

84 Bay Area Air Quality Management District, *Climate Protection Program*, 2017, *http://www.baaqmd.gov/plans-and-climate/climate-protection/climate-protection-program*, accessed November 19, 2019.

85 Bay Area Air Quality Management District, *California Environmental Quality Act Air Quality Guidelines*, May 2017, *http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en*, accessed November 19, 2019.

At the local level, the city adopted ordinance 81-08 in May 2008, amending the San Francisco Environment Code to establish greenhouse gas emissions targets and require departmental action plans. Ordinance 81-08 authorized the San Francisco Department of the Environment to coordinate efforts to meet the targets and established the following greenhouse gas emissions reduction limits and target dates:

- determine 1990 citywide greenhouse gas emissions by 2008 (i.e., the baseline level, with reference to which target reductions have been set);
- reduce greenhouse gas emissions to 25 percent below 1990 levels by 2017;
- reduce greenhouse gas emissions to 40 percent below 1990 levels by 2025; and
- reduce greenhouse gas emissions to 80 percent below 1990 levels by 2050.[86]

In July 2021, the city adopted an updated greenhouse gas ordinance to demonstrate the city's commitment to the Paris Agreement by establishing greenhouse gas reduction targets for 2030, 2040, and 2050 and setting other critical sustainability goals. The updated ordinance sets goals for both sector-based emissions and consumption-based emissions. The greenhouse gas targets established under ordinance 81-08 applied solely to sector-based emissions, which are those emissions that are generated within the geographic boundaries of the city. The updated ordinance reflects a more comprehensive effort to reduce greenhouse gas emissions by setting consumption-based targets as well. Consumption-based emissions are those that are associated with producing, transporting, using, and disposing of products and services consumed by people in the city, even those emissions that are generated outside of the city boundaries. The city's updated greenhouse gas reduction targets are as follows:

- by 2030, reduce sector-based greenhouse gas emissions to 61 percent below 1990 levels;
- by 2030, reduce consumption-based greenhouse gas emissions to 30 metric tons of $CO_2e$ per household or less, equivalent to a 40 percent reduction compared to 1990 levels;
- by 2040, reach net-zero sector-based emissions and sequester any residual emissions using nature-based solutions;[87] and
- by 2050, reduce consumption-based greenhouse gas emissions to 10 metric tons of $CO_2e$ per household or less, equivalent to an 80 percent reduction compared to 1990 levels.

These sector-based greenhouse gas reduction targets are more ambitious than those set forth in Executive Order B-30-15 (e.g., a 61 percent reduction in sector-based greenhouse gas emissions by 2030 rather than a 40 percent reduction by 2030) and Executive Order B-55-18 (e.g., achieving carbon neutrality by 2040 rather than by 2045). The consumption-based targets are consistent with the 2030 goal of Executive Order B-30-15 and the 2050 goal of Executive Order S-3-05 (80 percent below 1990 levels, by 2050).

The updated greenhouse gas ordinance also serves to codify the city's "0-80-100-Roots" climate action framework, which comprises climate and sustainability goals in these key areas: waste, transportation, energy, and carbon sequestration. The framework also emphasizes the importance of housing in implementing meaningful climate solutions, which require an increased supply of high-quality housing that

[86] City and County of San Francisco, *Greenhouse Gas Emissions Targets and Departmental Action Plans*, May 13, 2008, *https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_environment/0-0-0-908*, accessed November 19, 2019.

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

is both affordable and near transit service. The goals in the 0-80-100-Roots framework are defined as follows:

- Zero Waste (***0***-80-100-Roots)
  - By 2030, reduce the generation of solid waste to 15 percent below 2015 levels and reduce the amount of solid waste that is incinerated or sent to landfill to at least 50 percent below 2015 levels.

- Transportation (0-***80***-100-Roots)
  - By 2030, increase the percentage of low-carbon trips to at least 80 percent of measured trips and increase the number of electric vehicles to at least 25 percent of all registered private vehicles.
  - By 2045, increase the number of electric vehicles to 100 percent of all registered private vehicles.

- Energy (0-80-***100***-Roots)
  - By 2025, supply 100 percent renewable electricity.
  - By 2045, supply 100 percent renewable energy.

- Carbon Sequestration (0-80-100-***Roots***)
  - Sequester carbon through ecosystem restoration, including an increased urban tree canopy (i.e., tree roots), green infrastructure, and compost applications.

- Housing and Buildings
  - Build at least 5,000 new housing units per year, with at least 30 percent of these units provided as affordable units.
  - By 2021, require zero onsite fossil fuel emissions from all new buildings.
  - By 2035, require zero onsite fossil fuel emissions from all large existing commercial buildings.

To support the 2021 Housing and Buildings goal of zero onsite fossil fuel emissions from all new buildings, the board of supervisors passed an all-electric new construction ordinance in November 2020. The ordinance prohibits the installation of natural gas and propane space conditioning, water heating, cooking, and clothes drying equipment and appliances in all new residential and commercial buildings with initial building permit applications filed after June 1, 2021.[88]

San Francisco has developed many plans and programs for reducing the city's contribution to global climate change and meeting the goals of ordinance 81-08. The 2017 Greenhouse Gas Reduction Strategy Update[89] documents city actions related to pursuing cleaner energy, reducing energy consumption, supporting alternative transportation, and implementing solid waste policies. For instance, the city has implemented mandatory requirements and incentives that have measurably reduced greenhouse gas emissions, including but not limited to requirements for increased energy efficiency in new and existing buildings, requirements for the installation of solar panels or vegetation on roofs (i.e., living roofs), implementation of a green building strategy, implementation of a transportation sustainability program, adoption of a zero-waste strategy, adoption of a construction and demolition debris recovery ordinance, creation of a solar energy generation subsidy, incorporation of alternative-fuel vehicles in the city's transportation fleet (including

[88] San Francisco Department of Building Inspection, *All-Electric New Construction Ordinance, https://sfdbi.org/AllElectricNewConstruction Ordinance*, accessed August 20, 2021.

[89] San Francisco Planning Department, *2017 Greenhouse Gas Reduction Strategy Update*, July 2017, *https://sfplanning.org/project/greenhouse-gas-reduction-strategies*, accessed October 29, 2021.

buses), and adoption of a mandatory recycling and composting ordinance. The strategy also includes specific regulations for new development, which would reduce greenhouse gas emissions generated by anticipated future development. These greenhouse gas emissions reduction actions resulted in a 41 percent reduction in greenhouse gas emissions in 2019 compared with 1990 levels.[90,91] This level of greenhouse gas emissions substantially surpasses the 2020 and 2030 goals in the air district's 2017 Clean Air Plan, Executive Orders S-3-05 and B-30-15, AB 32, SB 32, and the city's 2017 greenhouse gas emissions reduction goal.

The July 2021 greenhouse gas ordinance requires the San Francisco Department of the Environment to prepare and submit to the mayor a climate action plan by December 31, 2021. Accordingly, the San Francisco Department of the Environment released the 2021 Climate Action Plan.[92] The climate action plan, which is to be updated every five years, would carry forward the efforts of the city's previous climate action plans and align with the Paris Agreement (e.g., limit global warming to 1.5 degrees Celsius) as well as the reduction targets adopted in the greenhouse gas ordinance. The climate action plan also incorporates an equity framework to address historic inequities; prioritizes the social, economic, and environmental benefits from implementing the climate action plan; and ensures that those benefits are distributed equitably.

***Transportation Sector Regulations***

With respect to transportation-related emissions, the climate change scoping plan relies on the requirements of SB 375[93] (chapter 728, statutes of 2008), also known as the Sustainable Communities and Climate Protection Act of 2008, to reduce carbon emissions from land use decisions. SB 375 requires each of the state's 18 metropolitan planning organizations to incorporate a sustainable communities strategy in their regional transportation plans, which would then achieve the greenhouse gas emissions reduction targets set by the air board. Plan Bay Area 2050, the Metropolitan Transportation Commission's regional transportation plan, was adopted in October 2021 and serves as a roadmap for the San Francisco Bay Area's future through 2050.[94] For the San Francisco Bay Area, the per capita greenhouse gas emissions reduction targets applicable to Plan Bay Area 2050 are 19 percent by 2035 (i.e., emissions from vehicles and light-duty trucks compared with 2005 levels).[95]

The Governor's OPR implemented changes to the CEQA Guidelines, including the addition of section 15064.3, which requires CEQA transportation analyses to move away from a focus on vehicle delay and level of service. In support of these changes, OPR published its *Technical Advisory on Evaluating Transportation Impacts in CEQA*, which states that the determination of a project's transportation impact should be based on whether project-related VMT per capita (or VMT per employee) would be 15 percent

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90 The City's greenhouse gas inventory is quantified in accordance with the Greenhouse Gas Protocol for Cities developed by the World Resources Institute, C40, and ICLEI. World Resources Institute, C40 Cities, ICLEI, Global Protocol for Community-Scale Greenhouse Gas Inventories, , accessed October 29, 2021. Additionally, the annual greenhouse gas inventory is submitted to global reporting entities (Carbon Disclosure Project, C40) and OpenDataSF.

91 San Francisco Department of the Environment, San Francisco's Carbon Footprint, 2017, *https://sfenvironment.org/carbon-footprint*, accessed November 19, 2019.

92 San Francisco Department of the Environment, San Francisco's Climate Action Plan 2021, *https://sfenvironment.org/sites/default/files/2021_climate_action_plan.pdf*, Accessed December 16, 2021.

93 California Government Code, sections 65080, 65400, 65583, 65584.01, 65584.02, 65584.04, 65587, 65588, 14522.1, 14522.2, and 65080.01; California Public Resources Code, sections 21061.3 and 21159.28; chapter 4.2, division 13, section 21155.

94 Association of Bay Area Governments and Metropolitan Transportation Commission, Plan Bay Area 2050, October 2021, *https://www.planbayarea.org/sites/default/files/documents/Plan_Bay_Area_2050_October_2021.pdf*, accessed November 17, 2021.

95 These targets became applicable on October 1, 2018. California Air Resources Board, *SB 375 Regional Plan Climate Targets*, *https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets*, accessed October 29, 2021.

lower than that of existing development in the region.[96] OPR's technical advisory explains that this criterion is consistent with CEQA section 21099, which states that the criteria for determining significance must "promote a reduction in greenhouse gas emissions." In addition, the 15 percent reduction is consistent with the VMT reduction that the air board has determined to be necessary to meet the state's 2030 and 2050 greenhouse gas goals.[97] This metric is intended to replace the use of vehicle delay and level of service for measuring transportation-related impacts.

In addition to actions to reduce VMT, the state has also adopted legislation to improve vehicle fuel efficiency. With the passage of AB 1493 (2002),[98] also known as Pavley I, California launched an innovative and proactive approach to dealing with greenhouse gas emissions and climate change at the state level. AB 1493 amended the health and safety code and requires the air board to develop and implement regulations to reduce automobile and light-duty truck greenhouse gas emissions. Although litigation challenged these regulations and the U.S. Environmental Protection Agency initially denied California's related request for a waiver, the waiver request was granted.[99] Additional strengthening of the Pavley standards (referred to previously as Pavley II and now referred to as the Advanced Clean Cars measure) was adopted for vehicle model years 2017–2025 in 2012. Together, the two standards are expected to increase average fuel economy to roughly 54.5 miles per gallon in 2025. In 2020, the air board estimated that fleet-wide fuel economy in California would be 42.5 miles per gallon.[100]

Adopted in December 2018, the Innovative Clean Transit regulation[101] requires public transit agencies to gradually transition to 100 percent zero-emission bus fleets by 2040. According to the air board, this regulation benefits the state by:[102]

- reducing greenhouse gas emissions for all Californians, especially transit-dependent and disadvantaged communities (the majority of these benefits would be in the state's most populated and affected areas where transit buses are most prevalent);
- increasing penetration of the first wave of zero-emission heavy-duty technologies into applications that are well suited to their use to further achieve emission reduction benefits;
- saving energy and reducing dependency on petroleum and other fossil fuels;
- expanding zero-emission vehicle industry to bring high-quality green jobs to local communities and trained workforce to California; and

96 Governor's Office of Planning and Research (OPR), *Technical Advisory on Evaluating Transportation Impacts in CEQA,* November 2017, *http://www.opr.ca.gov/docs/20171127_Transportation_Analysis_TA_Nov_2017.pdf*, accessed August 16, 2021.

97 Ibid.

98 California Health and Safety Code, sections 42823 and 43018.5.

99 California's waiver to set state-specific standards is currently uncertain as a result of the SAFE Vehicles Rule.

100 California Air Resources Board, *Comparison of Greenhouse Gas Reductions for the United States and Canada under U.S. CAFÉ Standards and California Air Resources Board Greenhouse Gas Regulation, https://ww2.arb.ca.gov/sites/default/files/2020-03/pavleycafe_reportfeb25_08_ac.pdf*, accessed October 29, 2021.

101 California Code of Regulations, title 13, sections 2023 and 2023.1–2023.11.

102 California Air Resources Board, *Innovative Clean Transit – About*, *https://ww2.arb.ca.gov/our-work/programs/innovative-clean-transit/about*, accessed September 3, 2021.

- providing other societal benefits by encouraging improved mobility and connectivity with zero-emission transportation modes and reduced growth in light-duty VMT.

***Energy Sector Regulations***

For the energy sector, California established aggressive renewable portfolio standards under SB 1078[103] (chapter 516, statutes of 2002) and SB 107[104] (chapter 464, statutes of 2006) that required retail sellers of electricity to provide at least 20 percent of their electricity from renewable sources by 2010. These bills amended the California Public Resources Code and Public Utilities Code. Executive Order S-14-08 (November 2008) expanded the state's renewable portfolio standards, which call for 20 to 33 percent of electricity to come from renewable sources by 2020.

In April 2011, Governor Brown signed SB X1-2[105] (chapter 1, statutes of 2011), codifying greenhouse gas emissions reduction goals for energy suppliers (i.e., 33 percent of electricity from renewable energy by 2020) by amending the California Fish and Game Code, the Public Resources Code, and Public Utilities Code. Under SB X1-2, all electricity-supplying entities must adopt the goals of the new renewable portfolio standard (i.e., 20 percent of retail sales from renewable sources by the end of 2013, 25 percent by the end of 2016, and 33 percent by the end of 2020).[106]

Eligible renewable sources include geothermal, ocean wave, solar photovoltaic, and wind sources but exclude large hydroelectric facilities (30 megawatts or more). Therefore, because the SFPUC receives more than 67 percent of its electricity from large hydroelectric facilities, the remaining electricity provided by the SFPUC is required to be 100 percent renewable.[107]

SB 350 (chapter 547, statutes of 2015),[108] signed by Governor Brown in October 2015, dramatically increased the stringency of the renewable portfolio standard and amended multiple state codes. SB 350 establishes a renewable portfolio standard that calls for 50 percent of electricity to come from renewable sources by 2030, along with interim targets of 40 percent by 2024 and 45 percent by 2027. SB 100[109] (2018) further accelerates the renewable energy targets that were set by earlier legislation by amending the California Public Utilities Code.

***Short-Lived Climate Pollutant Regulations***

SB 605[110] (2014) directed the air board, in coordination with other state agencies and local air districts, to develop a comprehensive Short-Lived Climate Pollutant Reduction Strategy; and SB 1383[111] (2016) directed the air board to approve and implement the Short-Lived Climate Pollutant Reduction Strategy to achieve the following reductions in short-lived climate pollutants:

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103 Chapter 2.3, part 1 of Division 1, California Public Utilities Code sections 387, 390.1 and 399.25.

104 California Public Resources Code, sections 25620.1, 25740–25743, 25745, 25746, 25749, 25751, 25470.5, and 25744.5. California Public Utilities Code, chapter 3, part 1, division 1, sections 387, 399.11–399.16, and 2854.

105 California Fish and Game Code, section 705; California Public Resources Code, sections 25740, 25740.5, 25741, 25742, 25746, 25747, 25751, 25519.5, and 25741.5; California Public Utilities Code, sections 399.11–399.20, 399.26, 399.30, 399.31, and 1005.1.

106 Ibid.

107 San Francisco Public Utilities Commission, *Adopt an Enforcement Program as required under the California Renewable Energy Resources Act,* December 13, 2011, *https://infrastructure.sfwater.org/fds/fds.aspx?lib=SFPUC&doc=741114&data=285328890*, accessed October 29, 2021.

108 California Health and Safety Code, section 44258.5; California Labor Code, section 1720; California Public Resources Code, sections 25310, 25943, 25302.2, and 25327; California Public Utilities Code, chapter 2.3, part 1, division 1, sections 359, 399.4, 399.11, 399.12, 399.13, 399.15, 399.16, 399.18, 399.21, 399.30, 454.55, 454.56, 701.1, 740.8, 9505, 9620, 337, 352, 237.5, 365.2, 366.3, 454.51, 454.52, 740.12, 9621, and 9622.

109 California Public Utilities Code, sections 399.11, 399.15, 399.30, and 454.53.

110 California Health and Safety Code, chapter 4.2, part 2, division 26, section 39730.

111 California Health and Safety Code, sections 39730.5–39730.8; California Public Resources Code, chapter 13.1, part 3, division 30, section 42652.

- 40 percent reduction in methane below 2013 levels by 2030;
- 40 percent reduction in hydrofluorocarbon gases below 2013 levels by 2030; and
- 50 percent reduction in anthropogenic black carbon below 2013 levels by 2030.

The bill also established the following targets for reducing organic waste in landfills and methane emissions from dairy and livestock operations:

- 50 percent reduction in organic waste disposal from the 2014 level by 2020;
- 75 percent reduction in organic waste disposal from the 2014 level by 2025; and
- 40 percent reduction in methane emissions from livestock manure management operations and dairy manure management operations below the dairy sector's and livestock sector's 2013 levels by 2030.

The air board and California's Department of Resources Recycling and Recovery (CalRecycle) are currently developing regulations to achieve the organic waste reduction goals under SB 1383. In January 2019 and June 2019, CalRecycle proposed new and amended regulations in titles 14 and 27 of the California Code of Regulations. Among other things, the regulations set forth minimum standards for organic waste collection, hauling, and composting. The final regulations include an incremental approach to implementation, which began January 1, 2022, with full implementation by 2025.

The air board adopted the Short-Lived Climate Pollutant Reduction Strategy in March 2017 as a framework for achieving the methane, hydrofluorocarbon, and anthropogenic black carbon reduction targets set by SB 1383. The Short-Lived Climate Pollutant Reduction Strategy includes 10 measures regarding short-lived climate pollutants, which fit within a wide range of ongoing planning efforts throughout the state, including the air board's and CalRecycle's proposed rulemaking on organic waste diversion.

**APPROACH TO ANALYSIS**

Greenhouse gas emissions are analyzed in the context of their contribution to the cumulative effects of climate change because individual actions could never generate enough greenhouse gas emissions to result in a noticeable change in the global average temperature. CEQA Guidelines section 15064.4 calls for a "good-faith effort" to "describe, calculate, or estimate" greenhouse gas emissions. CEQA Guidelines section 15064.4 also allows lead agencies to rely on a qualitative analysis to describe greenhouse gas emissions resulting from a project. In accordance with section 15064.4, the significance of greenhouse gas impacts should consider the extent to which the proposed action would increase or reduce greenhouse gas emissions, exceed a locally applicable threshold of significance, or comply with "regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions." The CEQA Guidelines also state that a project may be found to have a less-than-significant impact if it complies with an adopted plan that includes specific measures to reduce greenhouse gas emissions (section 15064[h][3]). Similarly, the air district has prepared guidelines and methodologies for analyzing greenhouse gas emissions.[112] These guidelines are consistent with CEQA Guidelines sections 15064.4 and 15183.5, which pertain to the analysis and determination of significant impacts from a proposed project's greenhouse gas emissions.

[112] The air district is currently updating its existing CEQA Guidelines and the Thresholds of Significance for greenhouse gases. As detailed in the air district's December 9, 2021, public workshop on this update, the air district's proposed thresholds maintain the option to evaluate projects based on consistency with a local greenhouse gas reduction strategy that meets the criteria under CEQA Guidelines section 15183.5(b).

The air district has reviewed the city's Greenhouse Gas Reduction Strategy and concluded that "aggressive greenhouse gas reduction targets and comprehensive strategies like San Francisco's help the Bay Area move toward reaching the state's AB 32 goals and also serve as a model from which other communities can learn."[113] Although the AB 32 milestone year of 2020 passed just two years ago, San Francisco has already met the 2030 greenhouse gas reduction goal of SB 32 (40 percent below 1990 levels); San Francisco's updated greenhouse gas ordinance includes a pathway to reach the 2050 goals of SB 32 to ensure that the city continues to serve as a model for other communities. As discussed above, the climate change scoping plan adopted pursuant to SB 32 is the state's overarching plan for addressing climate change. Its recommendations are intended to curb projected business-as-usual increases in greenhouse gas emissions and reduce them to 40 percent below 1990 levels by 2030. Meeting the emissions targets of SB 32 as well as longer-term goals would result in an overall annual net decrease in greenhouse gas emissions compared with current levels and account for the projected increases in emissions resulting from anticipated growth.

Given that the city's greenhouse gas emissions reduction targets are more aggressive than the state's 2030 and 2045 greenhouse gas emissions reduction targets, the city greenhouse gas ordinance is consistent with the goals of statewide executive orders and bills (i.e., AB 32; SB 32; and Executive Orders S-3-05, B-30-15, and B-55-18). For example, and as detailed above in Section E.8.3, "Regulatory Setting," although the state's 2030 greenhouse gas emission reduction goal is 40 percent below 1990 levels, the city's 2030 reduction target is 61 percent below 1990 levels. Therefore, compliance with policies, programs, and ordinances that comprehensively makeup the city's actions to achieve the greenhouse gas emissions reduction targets of the city greenhouse gas ordinance would also be consistent with the state's greenhouse gas goals and would not conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing greenhouse gas emissions. Similarly, the city's greenhouse gas strategy resulted in a 41 percent reduction in greenhouse gas emissions in 2019 compared with 1990 levels, [114,115] a level of greenhouse gas emissions that substantially surpasses the 2020 and 2030 goals in the air district's 2017 Clean Air Plan, Executive Orders S-3-05 and B-30-15, AB 32, SB 32, and the city's 2017 greenhouse gas emissions reduction goal. The city has developed a Greenhouse Gas Analysis Compliance Checklist to determine project compliance with greenhouse gas reduction regulations, including those specifically applicable to new development. Therefore, actions that are consistent with the city's comprehensive Greenhouse Gas Reduction Strategy and show compliance with the Greenhouse Gas Analysis Compliance Checklist would also be consistent with the state's greenhouse gas goals and would not conflict with an applicable plan or generate greenhouse gas emissions that would make a considerable contribution to global climate change.

Based on the city's comprehensive greenhouse gas reduction strategy, as detailed above, the proposed project is analyzed based on its consistency with applicable local, regional, and state plans, policies, and regulations adopted for the purpose of reducing greenhouse gas emissions and the cumulative impacts of climate change, including review under the planning department's Greenhouse Gas Analysis Compliance Checklist.

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113 Bay Area Air Quality Management District, Draft GHG Reduction Strategy Letter, 2010, *https://sfplanning.s3.amazonaws.com/sfmea/GHG/BAAQMD_Letter_GHGStrategy_2010.pdf*, accessed January 20, 2022.

114 The City's greenhouse gas inventory is quantified in accordance with the Greenhouse Gas Protocol for Cities developed by the World Resources Institute, C40, and ICLEI. World Resources Institute, C40 Cities, ICLEI, Global Protocol for Community-Scale Greenhouse Gas Inventories, *https://ghgprotocol.org/sites/default/files/standards/GPC_Full_MASTER_RW_v7.pdf*, accessed October 29, 2021. Additionally, the annual greenhouse gas inventory is submitted to global reporting entities (Carbon Disclosure Project, C40) and OpenDataSF.

115 San Francisco Department of the Environment, San Francisco's Carbon Footprint, 2017, *https://sfenvironment.org/carbon-footprint*, accessed November 19, 2019.

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

**PROPOSED PROJECT**

Individual projects contribute to the cumulative effects of climate change by directly or indirectly emitting greenhouse gases during construction and operational phases. Direct operational emissions include greenhouse gas emissions from new vehicle trips, other operational vehicle and equipment use, and area sources (minor landscape maintenance). Indirect emissions include emissions from electricity providers; energy required to pump, treat, and convey water; and emissions associated with waste removal, disposal, and landfill operations.

The proposed project would increase the intensity of use at the site by replacing four single-story, 30-foot-tall PDR buildings. Existing uses on the project site in 2017 consisted of storage and warehousing. These four buildings would be replaced with two new, larger, multi-story, 97-foot-tall (115-foot-tall with rooftop appurtenances included) PDR buildings (buildings A and B) that would support uses such as manufacturing and maker space, parcel delivery and last-mile delivery, wholesale and storage, fleet management,[116] and a small amount of retail and quick-service restaurant uses. Both buildings would include a one-way ramp system designed to provide full-service, upper-level truck access, and PDR spaces for its tenants. The proposed project would generate operational greenhouse gas emissions from a variety of sources, including area sources (landscape equipment), mobile sources (daily automobile and truck trips), other diesel-powered equipment (emergency generators and transportation refrigeration units supporting a portion of the truck trips), and energy sources (purchased electricity). During operations, the number of vehicles onsite would increase compared to 2017 conditions (i.e., conditions that existed prior to interim land use). Operation of the proposed project would contribute to an increase in greenhouse gas emissions generated at this site, with mobile sources as the primary source of greenhouse gas emissions resulting from the proposed project.

Construction activities would also result in temporary increases in greenhouse gas emissions. Construction activities that are likely to emit greenhouse gases include demolition of the existing buildings onsite, site preparation and grading, excavation and shoring, building construction, and site finishing work. During construction, there would be daily vehicle trips to transport materials to the site and construction workers traveling to the site to work. Equipment used for the construction activities listed above would be fueled by diesel, propane, and gasoline, which would contribute to emissions of nitrogen oxides, particulate matter, sulfur dioxide, carbon monoxide, methane, and carbon dioxide. Any temporary road obstructions caused by construction could lead to temporary traffic congestion and cause an increase in vehicles idling in the project vicinity.

The proposed project would be subject to regulations adopted to reduce greenhouse gas emissions, as identified in the city's greenhouse gas reduction strategy. As discussed below, compliance with the applicable regulations would reduce the proposed project's greenhouse gas emissions related to transportation, energy use, water use, waste disposal, and use of refrigerants.

[116] Fleet management is not a component of the preferred project land use for the purpose of this environmental analysis. This is because the manufacturing and maker, parcel delivery and last mile, and the wholesale and storage uses would result in higher vehicle trip rates (and corresponding noise and air quality impacts associated with vehicle trip rates) compared to fleet management uses. However, should the project sponsor elect to have a fleet management component as part of the project in the future, the environmental analysis would have adequately evaluated the transportation (and related air quality and noise) impacts from this use.

Compliance with the city's regulations that reduce greenhouse gases, as documented in the Greenhouse Gas Analysis Compliance Checklist, including the Commuter Benefits Program, TDM programs, Transportation Sustainability Program, bicycle parking requirements, low-emission car parking requirements, and car sharing requirements, would reduce the proposed project's transportation-related emissions. These regulations reduce greenhouse gas emissions from single-occupancy vehicles by promoting the use of sustainable transportation modes with zero or lower greenhouse gas emissions on a per capita basis. The project sponsor would incorporate multiple TDM measures into the design of the proposed project, such as an increased number of bicycle parking spaces, showers and locker facilities, and car-share parking measures (see Section A, Project Description, pp. 32 and 33). These design features would also contribute to reducing project-related greenhouse gas emissions and would further efforts to meet the city's targeted greenhouse gas reduction goals.

Although there would be an increase in mobile-source greenhouse gas emissions attributed to this site, siting a parcel and last-mile delivery use, as included in the proposed project, closer to its customer base would improve VMT efficiency compared to current locations and the majority of new development of last-mile delivery uses serving the San Francisco market, and minimize the regional greenhouse gas emissions for the portion of the project that may include parcel and last-mile delivery tenants. Currently, most of the last-mile delivery facilities serving customers in San Francisco are outside the city (e.g., South San Francisco, San Bruno, or Hayward). The demand for parcel and last-mile delivery facilities is expected to continue to grow to meet the customer demand for this service. Based on current services for existing demand, if a distribution center is not built at the project site, demand for parcel and last-mile delivery would continue to be served at a location outside San Francisco (e.g., Oakland or South San Francisco).

The siting of a new PDR site that is designed to accommodate parcel and last-mile delivery tenants in San Francisco would serve the existing and growing demand that would otherwise have to be met by more distant facilities and, therefore, would result in an opportunity to reduce regional VMT for parcel and last-mile delivery uses.[117] The relative comparison of miles per delivery route was evaluated in a study of e-commerce facility siting for the region, and the results are documented in Table 6. The change in VMT between a distribution center outside the city (e.g., South San Francisco, which was used in the analysis[118]) and one at the proposed project site was also calculated based on this information. Deliveries from the proposed project site by automobiles, vans, and smaller trucks, which would typically have a local destination, would have a shorter travel distance to the areas with the greatest existing and projected e-commerce market growth and last-mile delivery demand.[119] Larger trucks (such as tractor trailer trucks) making deliveries to the proposed project site would generally come from outside of the city and need to travel farther than would be necessary for such trucks serving a location outside San Francisco, resulting in an increase in VMT and greenhouse gas emissions from these trips compared to a facility in San Francisco.[120]

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117 Langan Engineering, Urban E-commerce Distribution Facility Selection Criteria, February 26, 2021.

118 South San Francisco was used in the analysis because there is an existing facility that serves San Francisco, and because it was described in the Langan Engineering August 15, 2019, technical memorandum that a facility could be located there based on zoning, proximity to delivery market, and availability of regional road network, among other factors. Other potential facilities that could be developed based on these factors would be located farther from the projected areas of e-commerce growth that would be served by the proposed project and would therefore result in additional mobile greenhouse gas emissions than a facility in South San Francisco.

119 Adavant and LCW Consultants, 749 Toland Street and 2000 McKinnon Avenue Project, Final Estimation of Project Travel Demand, December 10, 2021.

120 Ibid.

**Table 6 Relative Comparison of Miles per Delivery Route**

| Site Location | Miles per Route to San Francisco County Line (one way) |
|---|---|
| South San Francisco | 5.3 miles |
| Richmond | 20.2 miles |
| Oakland | 6.4 miles |
| San Leandro | 20.9 miles |
| Hayward | 25.4 miles |

Source: Langan Engineering 2021 [121]

Overall, this lesser travel distance for the majority of parcel and last-mile delivery trips that could be accommodated by the proposed project would substantially reduce the greenhouse gas emissions that would result from existing or future similar operations outside the city. As one of the largest sources of greenhouse gas emissions for the city, improving efficiency and reducing regional VMT supports the city's general plan policy 36.1 to support urban goods movement networks in San Francisco, while simultaneously being in alignment with the city's overall strategy to integrate land use planning to reduce VMT and transportation-related greenhouse gas emissions.

The project site would support a variety of land uses in addition to parcel and last-mile delivery uses, including maker and manufacturing, warehousing, retail, and quick-service restaurant uses. The proposed project would be required to comply with other elements of the Greenhouse Gas Analysis Compliance Checklist, including the energy-efficiency requirements of the city's Green Building Code, Stormwater Management Ordinance, Water Efficient Irrigation Ordinance, and light pollution reduction requirements. The project would seek LEED Gold certification or higher. Such compliance would promote energy and water use efficiency, thereby reducing the proposed project's energy-related greenhouse gas emissions.[122] These regulations and standards are designed to promote principles that improve energy efficiency, water efficiency and conservation, material and resource conservation and efficiency, and environmental and public health, and have been shown to result in an overall reduction in greenhouse gas emissions compared to similar construction that does not incorporate such standards and practices. Because transportation is the largest source of greenhouse gas emissions from the land use development, the fact that the project is sited in a low-VMT region also contributes to a decrease in mobile-source emissions of greenhouse gas compared to similar projects elsewhere. The project site would be designed with electric docking stations to allow electric plug-in of trucks serving the various land uses, thereby reducing idling time during loading and unloading of trucks serving future land uses onsite, and further reducing the generation of mobile-source greenhouse gas emissions.

The proposed project would be required to meet the renewable energy criteria of the city's Green Building Code, including onsite renewable energy generation, further reducing the proposed project's energy-related greenhouse gas emissions. As discussed in Section A, Project Description (p. 1), the project includes a solar photovoltaic system on the top of each building. Furthermore, 8 percent of the proposed parking spaces would be equipped with electric vehicle charging stations, while other spaces would be electric-vehicle-

121 Langan Engineering, Urban E-commerce Distribution Facility Selection Criteria, February 26, 2021.
122 Compliance with water conservation measures reduce the energy (and greenhouse gas emissions) required to convey, pump, and treat water required for the project.

ready. Furthermore, the proposed project would not include natural gas infrastructure, consistent with the city's strategies to reduce natural gas emissions, which are the second-largest greenhouse gas emissions source in the city (after transportation). These design features would contribute to reducing project-related greenhouse gas emissions and would further efforts to meet the city's targeted greenhouse gas reduction goals.

The proposed project's waste-related emissions would be reduced through compliance with the city's Recycling and Composting Ordinance, Construction and Demolition Debris Recovery Ordinance, and Green Building Code requirements. These regulations reduce the amount of materials sent to a landfill, reducing greenhouse gases emitted by landfill operations. These regulations also promote reuse of materials, conserving their *embodied energy*[123] and reducing the energy required to produce new materials.

Compliance with the city's street tree planting requirements would serve to increase *carbon sequestration*.[124] There are no existing street trees on the project site. Based on public works code section 806(d), the proposed project would be required to plant approximately 216 street trees along its 4,300 linear feet of street frontage. However, due to project and site constraints, the project sponsor proposes to plant approximately 124 street trees and pay the corresponding in-lieu fee for the remaining required trees that cannot be accommodated onsite. These 124 net new street trees would increase carbon sequestration at the project site. Other regulations, including those limiting refrigerant emissions and requiring low-emitting finishes, would reduce emissions of greenhouse gases and volatile organic compounds,[125] respectively. Thus, the proposed project was determined to be consistent with the Greenhouse Gas Analysis Compliance Checklist and San Francisco's comprehensive greenhouse gas reduction strategy.[126]

The project sponsor is required to comply with these regulations, which have proven effective because San Francisco's greenhouse gas emissions have decreased measurably compared with 1990 emissions levels, demonstrating that San Francisco has exceeded Executive Order S-3-05, AB 32, and the Bay Area 2017 Clean Air Plan greenhouse gas emission reduction goals for 2020. Furthermore, the city has exceeded its goal to reduce greenhouse gas emissions to 25 percent below 1990 levels by 2017; emissions were reduced by 36 percent for that year. As of 2019, the city has reduced its greenhouse gas emission 41 percent below 1990 levels despite a population increase of 22 percent.[127]

In addition, San Francisco's local greenhouse gas emission reduction targets meet and exceed the long-term greenhouse gas emission reduction goals of Executive Order S-3-05, Executive Order B-30-15, SB 32, the Bay Area 2017 Clean Air Plan, and Executive Order B-55-18. Therefore, because the proposed project would be consistent with the city's greenhouse gas emission reduction strategy, [126] it would be consistent with the greenhouse gas emission reduction goals of Executive Order S-3-05, Executive Order B-30-15, SB 32, the Bay Area 2017 Clean Air Plan, and Executive Order B-55-18; would not conflict with these plans; and would not exceed San Francisco's applicable greenhouse gas threshold of significance. Therefore, the proposed

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123 Embodied energy is the total energy required for the extraction, processing, manufacture, and delivery of building materials to the building site.

124 Carbon sequestration is the long-term storage of carbon in plants, soils, geologic formations, and the ocean.

125 Although they are not greenhouse gases, volatile organic compounds are precursor pollutants that form ground-level ozone. Increased ground-level ozone is an anticipated effect of future global warming that would result in added health effects locally. Reducing emissions of volatile organic compounds would reduce the anticipated local effects of global warming.

126 San Francisco Planning Department, Greenhouse Gas Analysis: Compliance Checklist for the San Francisco Gateway Project, 749 Toland Street and 2000 McKinnon Avenue, December 19, 2019.

127 San Francisco Department of the Environment, *San Francisco's Carbon Footprint*, https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan, accessed October 12, 2021.

project's contribution to cumulative greenhouse gas impacts would be less than cumulatively considerable, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, site plan, development intensity, and operations as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. Therefore, the proposed expanded streetscape variant would have greenhouse gas impacts similar to those of the proposed project, but would include a slightly larger footprint. The footprint would involve additional ground disturbance to improve the remainder of the adjacent public rights-of-way. As a result, the same construction equipment used for the street and sidewalk improvements for the proposed project would be used for the expanded streetscape variant but only for the limited area and time necessary to complete the roadway, curb cut, sidewalk, planting, and other upgrades. On the other hand, the expanded streetscape variant would also plant approximately 108 additional street trees, further contributing to carbon sequestration. For the same reasons cited for the proposed project, the expanded streetscape variant's contribution to cumulative greenhouse gas impacts would be less than cumulatively considerable, and no mitigation measures would be required. This topic will not be addressed in the EIR.

## E.9. Wind

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

This section evaluates the wind impacts of the proposed project on public areas adjacent to the project site. The discussion of wind impacts in this section is supported by a wind microclimate study.[128]

### WIND SETTING

In San Francisco, the primary wind directions are from the northwest, west-northwest, west, and west-southwest. These winds have the greatest frequency of occurrence and make up the majority of the strong winds, based on data collected at the old San Francisco Federal Building at 50 United Nations Plaza between 1945 and 1950. In general, wind speeds are higher in the spring and summer and lower in fall and winter. Daily variation in wind speed is evident, with the strongest winds in the mid- to late-afternoon and the lightest winds in the morning.

Planning code section 148, Reduction of Ground-level Wind Currents in Downtown Commercial (C-3) Districts, requires buildings in the C-3 downtown districts to be shaped so as not to cause ground-level wind currents to exceed defined comfort and hazard criteria. Because the project site is not in a C-3 district, it is not subject to planning code section 148. However, the wind hazard criterion is also used for the assessment of hazardous winds for the purpose of analysis under CEQA. This wind hazard criterion, especially the potential for a project to create new (or additional) locations where the wind hazard criterion would be exceeded, is used in the assessment as the CEQA significance threshold to determine whether the proposed project would substantially alter ground-level winds in public areas in an adverse manner. The hazard criterion of the planning code requires that buildings not cause equivalent wind speeds to reach or exceed the hazard level of 26 miles per hour, as averaged from a single full hour of the year. The hazard criterion is based on winds that are measured for one hour and averaged.

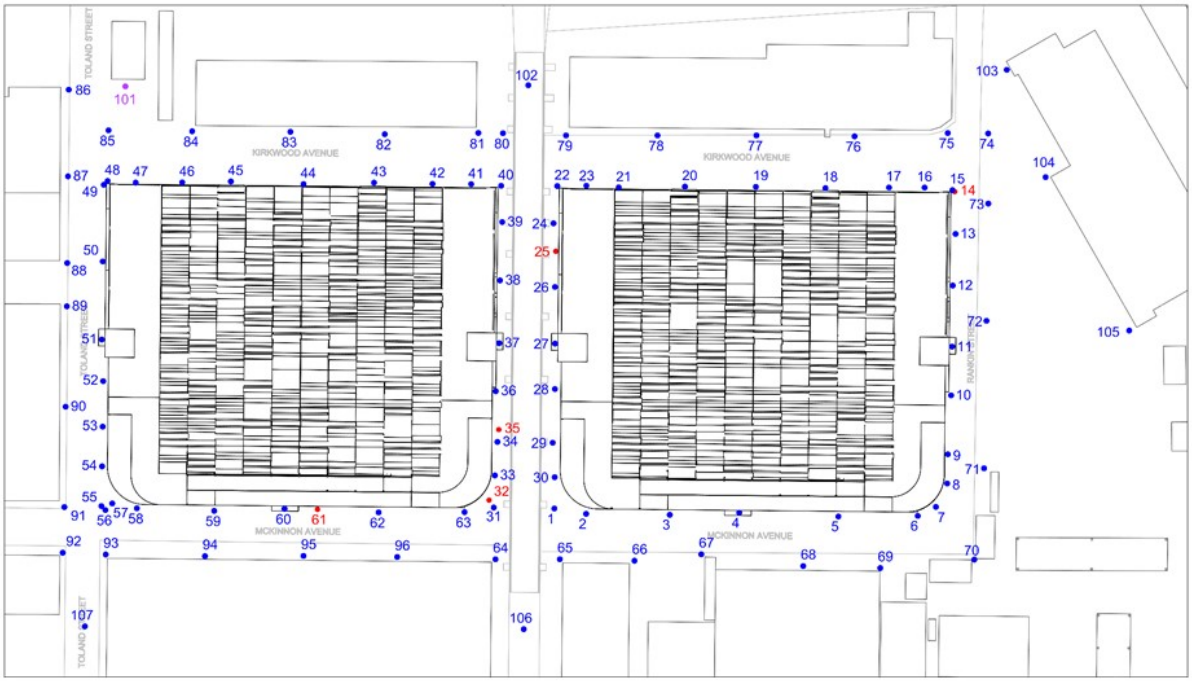
To predict wind speeds and frequencies, many factors are considered, including the geometry and orientation of proposed building(s), the position and height of surrounding buildings, the upwind terrain, and the local wind climate. Buildings taller than their surroundings tend to intercept the stronger winds at higher elevations and redirect them to the ground level. Such a “downwashing” flow is often the main cause for wind accelerations around tall buildings at the pedestrian (or ground) level. These winds can be relatively strong and turbulent, especially around the downwind building corner. Winds can also accelerate between two closely spaced buildings and through a passage underneath a building or bridge. If these building/wind combinations occur for prevailing wind directions, there is a greater potential for increased winds.

[128] BMT, San Francisco Gateway Project Final Wind Microclimate Study, June 23, 2020.

## APPROACH TO ANALYSIS

Wind tunnel testing was performed to quantify the pedestrian-level wind microclimate at and around the project site, in accordance with the city's standard test protocols. The testing first involved construction of a 1:300 scale model of the existing buildings at and surrounding the project site up to a 1,500-foot radius of the center of the site, along with a scale model of the project site. Wind speed measurements at assessment locations were made using probes capable of measuring fluctuating pressure differences that are calibrated against wind speed. A system of probes running simultaneously was used to obtain results from 98 test points at a height corresponding to 5 feet at full scale (i.e., pedestrian height). For the cumulative conditions, the total number of test points is reduced to 97 because location 101 would no longer be a publicly accessible ground-level location with the construction of the SF Market Project at 2095 Jerrold Avenue. The test points were selected in publicly accessible areas, including sidewalks, street intersections, and open spaces (Figure 23).

**Figure 23 Wind Tunnel Test Point Locations**




Source: BMT 2020

Measurements were taken for 16 wind directions in increments of 22.5 degrees (0 degrees represents the compass north). The methodology for quantifying the pedestrian-level wind microclimate of the site is summarized below:

- Measure the building-induced wind speeds at pedestrian level in the wind tunnel.
- Combine these with wind frequency statistics derived from the old San Francisco Federal Building at 50 United Nations Plaza to obtain the expected frequency and magnitude of wind speeds at pedestrian level.
- Compare the results with the section 148 wind hazard criteria to the conditions around the site.

The wind tunnel model compared the wind conditions for the following test scenarios:

1. **Existing Conditions (No Project)**: the existing condition, including buildings currently under construction or recently completed; this serves as the baseline for wind conditions in the study area without the proposed project
2. **Existing Conditions Plus Project**: the proposed project added to the existing conditions; this entails testing a 1:300 scale model of the proposed project in the existing setting to assess the change in ground-level wind conditions as a result of the proposed project
3. **Existing Conditions Plus Project with Wind Mitigation Measures:** wind mitigation measures (nine evergreen street trees; see Figure 24) added to the project in existing conditions to lessen wind hazard impacts
4. **Cumulative Conditions (No Project):** cumulative conditions anticipated in the project vicinity without the proposed project; this serves as the baseline for wind conditions in the study area with reasonably foreseeable development within a 1,500-foot radius from the project site
5. **Cumulative Conditions Plus Project:** the proposed project added to the cumulative conditions scenario—that is, the area and cumulative development that would be expected to contribute to wind effects due to their proximity to the project site (see Figure 24 on p. 105)—so as to assess whether the project could have a considerable contribution to a change in cumulative wind conditions
6. **Cumulative Conditions Plus Project with Wind Mitigation Measures:** wind mitigation measures (nine evergreen street trees; see Figure 24) added to the project in cumulative conditions to lessen cumulative wind hazard impacts

Existing conditions in the project vicinity generally are characterized as fairly windy. However, the site and surrounding study area are not prone to exceedances of the hazard criterion. The wind hazard results from the wind tunnel tests are summarized in Table 6 (p. 99); the wind hazard results are summarized in the top portion of the table, and the aggregate data for all test points are shown in the bottom portion. Under existing conditions (without the proposed project), wind speeds at all 98 test points would comply with the city's hazard criterion. Accordingly, under existing conditions, there are zero hours when winds exceed the wind hazard criterion.

## Figure 24 Location of Street Trees for Wind Mitigation


Source: BMT 2020

**Impact WI-1: The proposed project or variant would create wind hazards in publicly accessible areas of substantial pedestrian use. (Less than Significant with Mitigation)**

**PROPOSED PROJECT**

Existing conditions in the project vicinity generally are characterized as fairly windy. However, the site and surrounding study area are not prone to exceedances of the hazard criterion. The wind hazard results from the wind tunnel tests are summarized in Table 7 (p. 107); the wind hazard results are summarized in the top portion of the table (indicated in **bold** text), and the aggregate data for all test points are shown in the bottom portion. Where no wind hazards have been identified, the range of wind speeds across all test locations has been included for comparison. Under existing conditions (no project), wind speeds at all 98 test points would comply with the city's hazard criterion. Accordingly, under existing conditions, there are zero hours when winds exceed the wind hazard criterion.

Under existing plus project conditions, the average wind speed would decrease from 11 miles per hour to 10.5 miles per hour, compared to existing conditions without the project. However, with the proposed project, there would be a wind hazard criterion exceedance at two locations, and the number of hours that the wind hazard criterion would be exceeded would increase from zero hours per year to 13 hours per year. Fast upper-level prevailing westerly winds reaching the proposed development would be redirected toward the ground, creating downdraughts[129] and funneling[130] along Toland Street and accelerating around the corner of the proposed project at the junction with Kirkwood Avenue. The exceedances of the hazard criterion would occur around the northern corner of the proposed project on either side of Kirkwood Avenue (Locations 49 and 85).

Therefore, because the proposed project would result in an exceedance of the planning code wind hazard criterion, the proposed project would result in a significant wind impact.

A number of wind mitigation features were tested to reduce the project's wind impact, including various combinations of canopies (both solid and porous) and deciduous trees along Toland Street. Although the canopies were shown to be partially effective in reducing certain wind conditions, they also increased the number of wind hazard hours away from the project or at the northern corner of the project at the intersection of Toland Street and Kirkwood Avenue. Given that deciduous trees lose their leaves in winter, trees without leaves were assessed in the wind tunnel to determine whether they could effectively reduce wind impacts. The wind tunnel tests demonstrated that exceedances of the city's wind criteria would still occur with the inclusion of deciduous trees. Based on the wind tunnel tests, the planting of nine evergreen street trees , which retain their foliage throughout the year, was evaluated. The trees would be placed along the eastern sidewalk of Toland Street (Figure 24); each tree would be approximately 25 feet tall, with a 15-foot-diameter canopy. This planting would eliminate the exceedance of the hazard criterion at all test points in the existing plus project conditions.

[129] A downdraught is the effect of higher-level winds being deflected by a building towards ground level.
[130] Funneling is the acceleration of wind between adjacent buildings due to their proximity.

## Table 7 Wind Hazard Criterion Exceedance Results – Scenarios in Existing Conditions

| Existing Conditions (No Project) | | |
|---|---|---|
| **Location Number** | **Range of Wind Speed Exceeded 1 Hour per Year (mph)[1] for All Test Locations** | **Hours per Year Wind Speed Exceeds Hazard Criterion** |
| No exceedances at any location | 14 – 32 | 0 |
| | | |
| | **Average Wind Speed Exceeded 1 Hour per Year (mph)[1]** | **Total Hours per Year Wind Speed Exceeds Hazard Criterion** |
| **All Test Points** | 22.9 | 0 |

| Existing Conditions Plus Project | | | |
|---|---|---|---|
| **Location Number[2]** | **Wind Speed Exceeded 1 Hour per Year (mph)[1] for Test Locations Exceeding Wind Hazard Criterion** | **Hours per Year Wind Speed Exceeds Hazard Criterion** | **Hours Change Relative to Existing Conditions** |
| 49 | **40** | **5** | **5** |
| 85 | **42** | **8** | **8** |
| | **Average Wind Speed Exceeded 1 Hour per Year (mph)[1]** | **Total Hours per Year Wind Speed Exceeds Hazard Criterion** | **Total Hours Change Relative to Existing Conditions** |
| **All Test Points** | 24.1 | **13** | **13** |

| Existing Conditions Plus Project with Wind Mitigation | | | |
|---|---|---|---|
| **Location Number** | **Range of Wind Speed Exceeded 1 Hour per Year (mph)[1] for All Test Locations** | **Hours per Year Wind Speed Exceeds Hazard Criterion** | **Hours Change Relative to Existing Conditions** |
| No exceedances at any location | 11 – 35 | 0 | 0 |
| | | | |
| | **Average Wind Speed Exceeded 1 Hour per Year (mph)[1]** | **Total Hours per Year Wind Speed Exceeds Hazard Criterion** | **Total Hours Change Relative to Existing Conditions** |
| **All Test Points** | 23.8 | 0 | 0 |

Source: BMT 2020

Notes:

Results that exceed the city's wind criteria are indicated in **bold.** The table shows that exceedances occur under the Existing Conditions Plus Project at two locations.

[1] The probability of having an equivalent wind speed exceed the 26 mph mean-hourly wind speed hazard criterion for a full hour within any one-year period. The wind hazard criterion is derived from the 26 mph hourly average wind speed that would generate a three-second gust of wind at 20 meters per second, a commonly used guideline for wind safety. In the results table, the 26 mph hourly average is converted to a one-minute average of 36 mph, which is used to determine compliance with the 26 mph one-hour hazard criterion in the planning code (Arens, E. et al., "Developing the San Francisco Wind Ordinance and its Guidelines for Compliance," Building and Environment, Vol. 24, No. 4, p. 297-303, 1989).

[2] Refer to Figure 23, Wind Tunnel Test Point Locations, on p. 103, for the test point locations that would have exceedances as a result of the proposed project.

mph = miles per hour

On February 2, 2021, the San Francisco Bureau of Urban Forestry gave preliminary approval for the use of the proposed nine evergreen street trees on the eastern sidewalk of Toland Street.[131] If the building design changes or the trees are not maintained to be at least 25 feet tall with a 15-foot-diameter canopy, the proposed project could result in an exceedance of the wind hazard criterion. This would also be a significant impact. Mitigation Measures M-WI-1a: Wind Hazard Evaluation for Building Design and Streetscape Modifications; and M-WI-1b: Maintenance of Landscaping Features that Reduce Wind Hazards, have been included to address these circumstances and ensure that the proposed project would not result in an exceedance of the wind hazard criterion. With implementation of Mitigation Measures M-WI-1a: Wind Hazard Evaluation for Building Design and Streetscape Modifications; and M-WI-1b: Maintenance of Landscaping Features that Reduce Wind Hazards, exceedances of the city's wind hazard criterion would not occur, and wind impacts on publicly accessible areas of substantial pedestrian use would be less than significant.

**Mitigation Measure M-WI-1a** **Wind Hazard Evaluation for Building Design and Streetscape Modifications.** If the proposed project's design, including the wind mitigation measures (M-WI-1b), is modified in any way that could affect ground-level wind conditions, the new design shall be evaluated by a qualified wind expert to determine the potential for the modified project to result in a new wind hazard exceedance (defined as the one-hour wind hazard criterion of 26 miles per hour equivalent wind speed). The evaluation may require wind tunnel testing by the qualified expert to determine whether the modified project would result in an exceedance of the wind hazard criterion. If the modified project could exceed the wind hazard criterion, the project buildings shall be shaped (e.g., by including setbacks or using other building design techniques) or other wind-baffling measures shall be implemented, so that the project does not result in an exceedance of the one-hour wind hazard criterion of 26 miles per hour equivalent wind speed.

**Mitigation Measure M-WI-1b** **Maintenance of Landscaping Features that Reduce Wind Hazards.** The project sponsor shall maintain, for the life of the proposed project buildings, all landscaping features required to ensure that the proposed project does not result in in an exceedance of the one-hour wind hazard criterion of 26 miles per hour equivalent wind speed. These features include installation of nine evergreen street trees, each approximately 25 feet tall with a 15-foot-diameter canopy, along the eastern sidewalk of Toland Street *or* any landscaping features required pursuant to Mitigation Measure M-WI-1a: Wind Hazard Evaluation for Building Design and Streetscape Modifications.

***Significance after Mitigation.*** Based on wind tunnel testing of the existing conditions plus project with wind mitigation features described in Mitigation Measure M-WI-1b, the 13 hours of wind hazard exceedances would be eliminated and the wind hazard criterion would be met at all test points. Mitigation Measure M-WI-1a: Wind Hazard Evaluation for Building Design and Streetscape Modifications, would ensure that the proposed project does not exceed the wind hazard criterion in the event of design changes. Additionally, Mitigation Measure M-WI-1b: Maintenance of Landscaping Features that Reduce Wind Hazards, would entail the maintenance, for the life of the project buildings, of any landscaping features required to ensure that the one-hour wind hazard is not exceeded. Therefore, the proposed project would not create wind hazards in publicly

[131] Dottson, Marcus, Urban Forestry Inspector, San Francisco Bureau of Urban Forestry, email correspondence between Marcus Dottson and Chloe Hanna-Corpi and Brian Liles (Jackson Liles Architecture), February 2, 2021.

accessible areas of substantial pedestrian use, and the impact would be less than significant with mitigation. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses; building heights, massing, and design; and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would have wind impacts similar to those of the proposed project and would not include construction of any additional structures onsite. The expanded streetscape variant would include additional street trees on the sidewalks of the streets along the project perimeter. These additional street trees could reduce ground-level wind speeds near the project site. However, similar to the proposed project, under the expanded streetscape variant, the project sponsor would be required to implement Mitigation Measures M-WI-1a: Wind Hazard Evaluation for Building Design and Streetscape Modifications; and M-WI-1b: Maintenance of Landscaping Features that Reduce Wind Hazards. With implementation of these measures, the expanded streetscape variant would not create wind hazards in publicly accessible areas of substantial pedestrian use, and the impact would be less than significant with mitigation. This topic will not be addressed in the EIR.

**Impact C-WI-1 The proposed project or variant, in combination with cumulative projects in the project site vicinity, could result in cumulative wind impacts. (Less than Significant with Mitigation)**

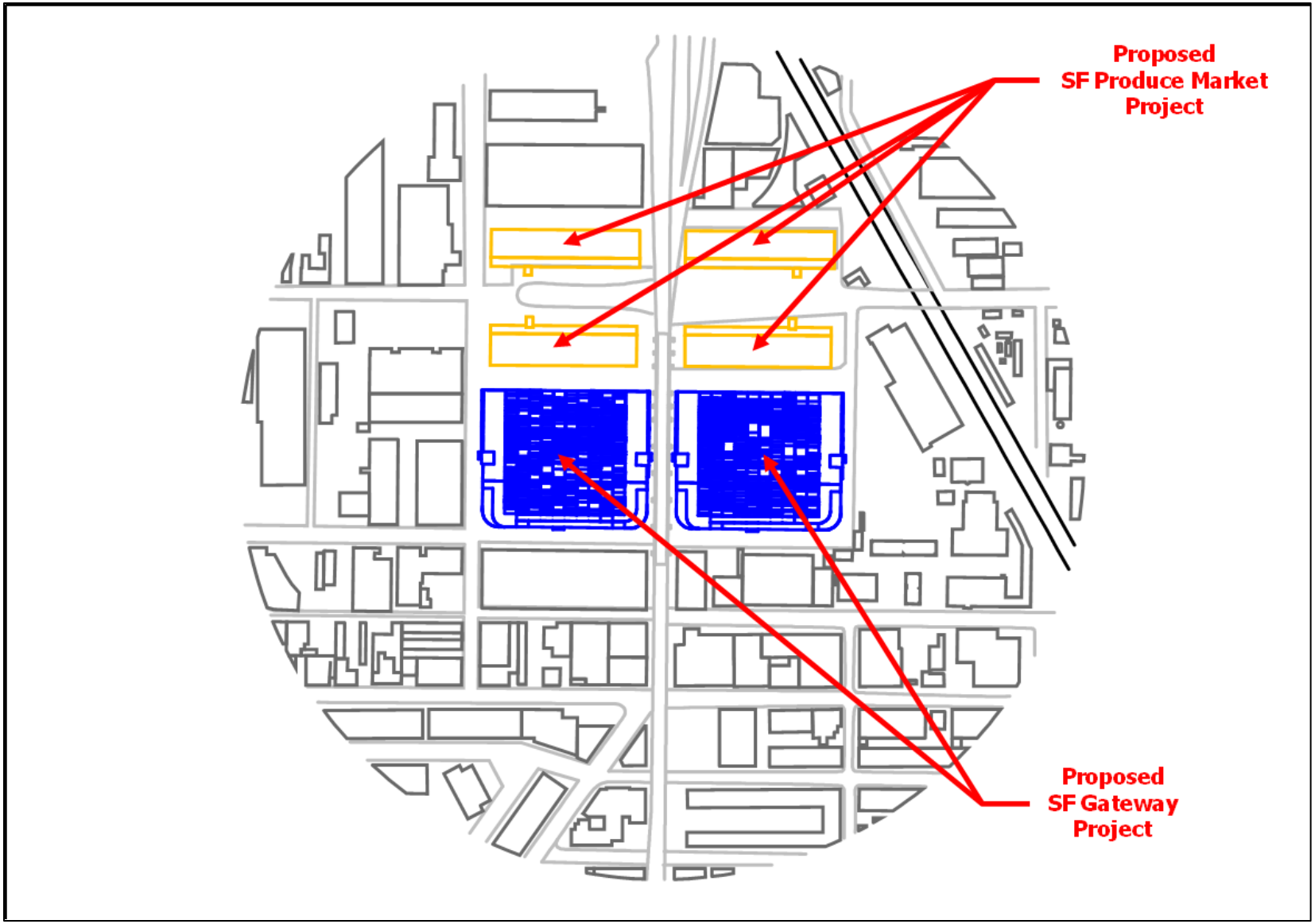
**PROPOSED PROJECT**

The cumulative conditions analysis involves testing the impact of the proposed project, in conjunction with other cumulative development projects in the study area, on the wind environment in the project vicinity. Of the cumulative projects in the vicinity of the project site, only the SF Market Project would be expected to contribute to ground-level wind effects near the project vicinity (see Figure 25 on p. 110). The other cumulative projects listed in the cumulative project setting (pp. 43 through 46) are too distant from the project site, not of sufficient height, or involve minor reconfiguration of aboveground equipment or facilities that would not affect ground-level wind conditions.

The cumulative conditions (no project) were tested first to define wind conditions resulting from other cumulative developments in the project vicinity. As explained above, only the SF Market Project would be expected to contribute to wind effects within the 1,500-foot study area. The wind hazard criterion exceedance results from the cumulative conditions scenarios wind tunnel tests are summarized in Table 8 (p. 111); the cumulative wind hazard results are summarized in the top portion of the table (indicated in **bold** text), and the aggregate data for all test points are shown in the bottom portion. Where no wind hazards have been identified, the range of wind speeds across all test locations has been included for comparison. Under cumulative conditions (no project), some accelerated winds in localized areas would occur due to increased funneling and acceleration around corners, while equally providing shielding from prevailing winds in other areas. However, all 97 test points[132] would comply with the hazard criterion under cumulative conditions (no project), similar to the existing conditions (no project) scenario. Accordingly, the total number of hazard exceedance hours would be zero.

[132] For the cumulative conditions, the total number of test points is 97 because one of the test sites under existing conditions would no longer be a publicly accessible ground-level location with the proposed development at this site.

**Figure 25 Cumulative Conditions Plus Project**




Source: BMT 2020

## Table 8 Wind Hazard Criterion Exceedance Results – Scenarios in Cumulative Conditions

| Cumulative Conditions (No Project) Scenario | | | |
|---|---|---|---|
| **Location Number** | **Range of Wind Speed Exceeded 1 Hour per Year (mph)[1] for All Test Locations** | **Hours per Year Wind Speed Exceeds Hazard Criterion** | **Hours Change Relative to Existing Scenario** |
| No exceedances at any location. | 13 – 33 | 0 | 0 |
| | | | |
| | | | |
| | **Average Wind Speed Exceeded 1 Hour per Year (mph)[1]** | **Total Hours per Year Wind Speed Exceeds Hazard Criterion** | **Total Hours Change Relative to Existing Scenario** |
| **All Test Points** | 22.6 | 0 | 0 |

| Cumulative Conditions Plus Project | | | |
|---|---|---|---|
| **Location Number[2]** | **Wind Speed Exceeded 1 Hour per Year (mph)[1] for Test Locations Exceeding Wind Hazard Criterion** | **Hours per Year Wind Speed Exceeds Hazard Criterion** | **Hours Change Relative to Existing Conditions** |
| 49 | **43** | **12** | **12** |
| 85 | **38** | **2** | **2** |
| 87 | **39** | **4** | **4** |
| | **Average Wind Speed Exceeded 1 Hour per Year (mph)[1]** | **Total Hours per Year Wind Speed Exceeds Hazard Criterion** | **Total Hours Change Relative to Existing Scenario** |
| **All Test Points** | 24.3 | **18** | **18** |

| Cumulative Conditions Plus Project with Wind Mitigation | | | |
|---|---|---|---|
| **Location Number** | **Range of Wind Speed Exceeded 1 Hour per Year (mph)[1] for All Test Locations** | **Hours per Year Wind Speed Exceeds Hazard Criterion** | **Hours Change Relative to Existing Conditions** |
| No exceedances at any location. | 11 – 34 | 0 | 0 |
| | | | |
| | | | |
| | **Average Wind Speed Exceeded 1 Hour per Year (mph)[1]** | **Total Hours per Year Wind Speed Exceeds Hazard Criterion** | **Total Hours Change Relative to Existing Scenario** |
| **All Test Points** | 23.8 | 0 | 0 |

Source: BMT 2020

Notes:

Results that exceed the city's wind criteria are indicated in **bold.** The table shows that exceedances occur under the Cumulative Conditions Plus Project at three locations.

[1] The probability of having an equivalent wind speed exceed the 26 mph mean-hourly wind speed hazard criterion for a full hour within any one-year period. The wind hazard criterion is derived from the 26 mph hourly average wind speed that would generate a three-second gust of wind at 20 meters per second, a commonly used guideline for wind safety. In the results table, the 26 mph hourly average is converted to a one-minute average of 36 mph, which is used to determine compliance with the 26 mph one-hour hazard criterion in the planning code (Arens, E. et al., "Developing the San Francisco Wind Ordinance and its Guidelines for Compliance," Building and Environment, Vol. 24, No. 4, p. 297-303, 1989).

[2] Refer to Figure 23, Wind Tunnel Test Point Locations, for the test point locations that would have exceedances as a result of the proposed project.

mph = miles per hour

Under cumulative conditions plus project, wind hazard exceedances are expected to occur at three test locations and would increase the total number of exceedance hours from zero hours per year to 18 hours per year. Because the exposure of the proposed project to prevailing westerly winds would be similar under existing and cumulative conditions, the resulting flow features and wind conditions around the project site for cumulative plus project conditions are similar to the existing plus project conditions. The wind hazard criterion exceedances would occur around the northern corner of the proposed project on either side of Kirkwood Avenue and Toland Street. Therefore, the proposed project, in combination with cumulative projects, would create wind hazards in publicly accessible areas of substantial pedestrian use, resulting in a significant cumulative impact. Given that the wind hazard impacts would only occur in the cumulative scenario with the proposed project, the project's contribution to cumulative wind impacts would be cumulatively considerable. The wind tunnel testing shows that the same wind mitigation identified in Impact WI-1 to eliminate existing plus project wind hazard exceedances also would avoid the cumulative wind hazard exceedances, reducing the cumulative wind impact to a less-than-significant level.

The wind tunnel model did not include the 2270 McKinnon Avenue project, because it had not been proposed when wind tunnel testing commenced for the SF Gateway Project. The principal effect of the 2270 McKinnon Avenue project on wind conditions around the proposed project would be one of shielding from prevailing winds. Thus, including this project as part of the cumulative conditions would not alter the wind tunnel results.[133]

For the reasons cited above for the proposed project, should there be any change to the exterior design of the project buildings or landscaping, the same mitigation measures identified for the proposed project, Mitigation Measures M-WI-1a: Wind Hazard Evaluation for Building Design and Streetscape Modifications; and M-WI-1b: Maintenance of Landscaping Features that Reduce Wind Hazards, would apply and would ensure that cumulative wind impacts are less than significant.

***Significance after Mitigation***

Based on the wind tunnel testing under cumulative conditions plus project with wind mitigation, wind conditions at all 97 test points would comply with the hazard criterion, and the total number of wind hazard exceedance hours would be zero. Thus, the proposed project's cumulatively considerable contribution to significant cumulative wind impacts would be eliminated. Mitigation Measure M-WI-1a: Wind Hazard Evaluation for Building Design and Streetscape Modifications, would ensure that the proposed project does not result in a cumulatively considerable wind impact in the event of design changes. Additionally, Mitigation Measure M-WI-1b: Maintenance of Landscaping Features that Reduce Wind Hazards, would entail the maintenance, for the life of the project buildings, of any landscaping features required to ensure that the proposed project does not cumulatively contribute to a one-hour wind hazard exceedance. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses; building heights, massing, and design; and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The proposed expanded streetscape variant would have wind impacts similar to those of the proposed project and would not include construction of any additional

[133] NOVA Fluid Mechanics (Formerly BMT), 75006 San Francisco Gateway Project – Cumulative Wind Review, February 15, 2022.

structures onsite. The expanded streetscape variant would include additional street trees on the sidewalks of the streets along the project perimeter. These additional street trees could reduce ground-level wind speeds near the project site. However, similar to the proposed project, under the expanded streetscape variant, the project sponsor would be required to implement Mitigation Measures M-WI-1a: Wind Hazard Evaluation for Building Design and Streetscape Modifications; and M-WI-1b: Maintenance of Landscaping Features that Reduce Wind Hazards. With implementation of these measures, the expanded streetscape variant would ensure that cumulative wind impacts are less than significant. This topic will not be addressed in the EIR.

## E.10. Shadow

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

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

**PROPOSED PROJECT**

Planning code section 295 generally prohibits new structures taller than 40 feet that would cast additional shadows on open space that is under the jurisdiction of the San Francisco Recreation and Park Department between one hour after sunrise and one hour before sunset, at any time of the year, unless that shadow would not result in a significant adverse effect on the use of the open space.

The criteria for determining the significance of impacts under CEQA is whether the proposed project would create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas, regardless of whether those facilities or areas are protected by planning code section 295 (i.e., under jurisdiction of public entities other than the Recreation and Park Commission or privately owned and publicly accessible open space). In addition, as under planning code section 295, the CEQA analysis of shadow impacts takes into account the use of the open space; the time of day and year of project shadow; the physical layout and facilities affected; the intensity, size, shape, and location of the shadow; and the proportion of open space affected.

As described in Section A, Project Description, buildings A and B each would be a maximum height of 97 feet (115 feet with rooftop appurtenances included). Because the proposed project would be more than 40 feet tall, the planning department performed a shadow fan analysis to assess the new shadow resulting from the proposed project.[134] Based on this analysis, the proposed project would not affect any parks subject to planning code section 295.

Selby and Palou Mini Park is the nearest San Francisco Recreation and Park Commission property to the project site. It is a 0.29-acre urban park, approximately 900 feet to the southwest of the project site along Selby Street between Quesada and Palou avenues. According to the shadow fan analysis by the planning department, the proposed project would not create new shadow on this park at any time throughout the year. There are no other San Francisco Recreation and Park Commission properties that are within, or near, the potential reach of the proposed project's shadow.

[134] San Francisco Planning Department, Preliminary Shadow Fan Analysis: 749 Toland Street and 2000 McKinnon Avenue, September 9, 2019.

There are no other public parks or open spaces owned by other city agencies that are within, or near, the potential reach of shadow under the proposed project. Therefore, the proposed project would have no shadow impact on public parks or open spaces.

The proposed project would shade portions of streets, sidewalks, and private properties in the project vicinity at various times of the day throughout the year. The shadows on streets and sidewalks would not exceed levels commonly expected in urban areas and would be considered a less-than-significant effect under CEQA. Additionally, these shadows would be transitory in nature, would not substantially affect the use of the sidewalks, and would not increase shadow above levels that are common and generally expected in a developed urban environment.

As discussed above, the proposed project would not create new shadow that substantially affects existing outdoor recreation facilities or other public areas. This impact would be less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, building heights and massing, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would not create new shadow because there would not be any additional aboveground structures under the expanded streetscape variant compared to the proposed project. Similar to the proposed project, the impact of the expanded streetscape variant would be less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**Impact C-SH-1 The proposed project or variant, in combination with cumulative projects in the project site vicinity, would result in less-than-significant cumulative shadow impacts. (Less than Significant)**

**PROPOSED PROJECT**

The geographic context for shadow impacts is the area in which the proposed project and cumulative projects, in combination, would shade the same public open spaces. Cumulative projects that include aboveground construction in the project vicinity would add shadow to sidewalks immediately surrounding the project site, but would not shadow San Francisco Recreation and Park properties (see Section B, Cumulative Setting, and Figure 22, pp. 43 through 46). The projects that involve aboveground and building footprint changes include the SF Market Project; the 2270 McKinnon Avenue Project; and the SFPUC projects in the Southeast Treatment Plant site, including the Headworks Project and the Biosolids Digester Facility Project. The other cumulative projects are in-kind replacements, underground or street-level improvements, or indoors, and would not affect shadows.

As discussed above under Impact SH-1, shadow from the proposed project would not reach any offsite publicly accessible open spaces (other than sidewalks). Therefore, the proposed project would not have the potential to combine with impacts from cumulative projects to result in cumulative shadow impacts on publicly accessible open spaces.

Although these cumulative projects could also shade public sidewalks, cumulative shadow from these projects would not increase shading on public sidewalks above levels that are common and generally

accepted in developed urban environments. Therefore, the proposed project, in combination with cumulative projects, would have less-than-significant cumulative shadow impacts, and no mitigation measures are required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, building heights and massing, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. Therefore, the proposed expanded streetscape variant would have the same shadow impacts as the proposed project because they would have the same aboveground structures. Similar to the proposed project, the expanded streetscape variant, in combination with cumulative projects, would have less-than-significant cumulative shadow impacts, and no mitigation measures are required. This topic will not be addressed in the EIR.

## E.11. Recreation

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

**Impact RE-1** **The proposed project or variant would not increase the use of existing parks and recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. (Less than Significant)**

**PROPOSED PROJECT**

The project site is in an intensely developed urban area that does not contain large regional park facilities. However, there are two small neighborhood parks and two community gardens near the project site. The following parks are within 0.5 mile of the project site:

- The Selby and Palou Mini Park is a 0.29-acre park in the Bayview neighborhood, approximately 900 feet southwest of the project site. The park includes benches, picnic tables, a basketball court, and a children's play area.
- The Palou and Phelps Mini Park is a 2.63-acre park, approximately 0.3 mile south of the project site. The park includes a playground, benches, trails, and a steep grass area.
- The Wolfe Lane Community Garden is a 0.05-acre community garden managed by the San Francisco Recreation and Park Department, where members can grow produce and ornamental plants for personal use. The garden is approximately 0.4 mile west of the project site.
- The Dogpatch/Miller Memorial Garden is an approximately 0.25-acre community garden and park, owned by San Francisco Recreation and Park Department. The garden is approximately 0.4 mile west of the project site.

***Construction***

During the 31-month construction period, approximately 400 to 500 workers would be onsite per day. Staffing levels would vary throughout the year in accordance with seasons and onsite construction activities. As discussed in Section E.2, Population and Housing, short-term construction workers are not expected to permanently relocate to the city from more distant locations. During construction, there may be temporary demand for these recreational resources because workers could use parks, community gardens,

and recreational facilities when on break. Consequently, any use by project construction workers of the nearby mini-parks, the more distant neighborhood and regional parks facilities, or other recreational facilities would be temporary and minimal. Additionally, community gardens are typically used by members who are actively involved in maintaining them, and it is less likely that construction workers would become members. Therefore, impacts to recreational resources during construction would be less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

***Operation***

The proposed project does not involve the construction of residential units that would generate an increased demand for recreational services. However, the proposed project would result in an increased number of employment opportunities at the site. This increase in the number of onsite employees could result in an increased demand for and use of neighborhood parks, community gardens, and recreational facilities. In general, it is anticipated that new employees would only visit open spaces during brief periods limited to the lunch hour or other midday breaks.

Additionally, due to the nature of the land uses described in Table 3, Preferred Project Use Mix (p. 19), and the normal hours detailed on Figure 13, Production, Distribution, Repair, and Related Uses (p. 21), a large number of the employees onsite would not be working a "typical" eight-hour workday at the project site. Under each use, employees would work shifts throughout different hours of the day and night. It is anticipated that any employees working after dark would not likely use any recreational facilities during their shift. A majority of the employees onsite would work for parcel delivery and last-mile companies (65 percent of the total gross square footage of the PDR-related uses onsite) and wholesale and storage companies (32 percent of the total gross square footage of the PDR-related uses onsite). As described in Section E.2, Population and Housing, the net new number of employees onsite would be 1,242. The number of workers associated with completing *visitor trips*[135] to and from the project site would be approximately 3,800.[136] These 3,800 workers would spend the majority of their shifts offsite (i.e., a parcel delivery driver would spend a significant amount of time away from the project site delivering goods throughout the day rather than being onsite for long periods of time).

As stated above under "Construction," community gardens are typically used by members who care for the garden. It is less likely that employees would become members of the community gardens. Additionally, the project site is not in a "high need" area according to the general plan, defined as areas with high population densities, high concentrations of seniors and youth, and lower income populations that live outside of existing park service areas.[137] The number of employees that may use these recreational resources is not expected to substantially accelerate the physical deterioration of these facilities. Therefore, the proposed project would have a less-than-significant impact on recreational facilities and resources, and no mitigation measures would be required. This topic will not be addressed in the EIR.

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[135] Visitor trips were defined as all other trips not related to onsite employees in the Final Travel Demand Memorandum. The number of workers associated with the visitor trips (e.g., goods deliveries, parcel and last-mile delivery trips) was estimated based on one worker per round vehicle trip to and from the project sites.

[136] Adavant and LCW Consultants, 749 Toland Street and 2000 McKinnon Avenue Project, Final Estimation of Project Travel Demand, December 10, 2021.

[137] City and County of San Francisco, San Francisco General Plan: Recreation and Open Space Element, 2014.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, employment, operations, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. Therefore, the proposed expanded streetscape variant would have the same recreation impacts as the proposed project and would not increase the use of existing parks and recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. This impact would be less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**Impact RE-2 The proposed project or variant would not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. (No Impact)**

**PROPOSED PROJECT**

The proposed project does not include recreational facilities or require the construction or expansion of recreational facilities that could have an adverse effect on the environment. The two new buildings are in a PDR zoning district and would be designed for PDR uses and limited retail uses. In accordance with the city's planning code (article 2), PDR districts are not required to provide recreational space.[138] Therefore, the proposed project would have no impact related to construction or expansion of existing recreational facilities that might result in an adverse physical effect on the environment. No mitigation measures would be required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, employment, operations, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would have the same recreation impacts as the proposed project and would have no impact related to construction or expansion of existing recreational facilities that might result in an adverse physical effect on the environment. No mitigation measures would be required. This topic will not be addressed in the EIR.

**Impact C-RE-1 The proposed project or variant, in combination with cumulative projects in the vicinity of the project site, would result in less-than-significant cumulative impacts related to recreation. (Less than Significant)**

**PROPOSED PROJECT**

The geographic context for cumulative recreation impacts for the proposed project is the immediate neighborhood, or generally the area within 0.5 mile of the project site, because workers would not be expected to travel to recreational facilities beyond this distance. The nearest cumulative projects are identified in Section B, Project Setting, pp. 43 through 46. These include the SF Market Project; the Bayview Community Based Transportation Plan; the Quint-Jerrold Connector; the 2270 McKinnon Avenue Project; and the SFPUC projects in the Southeast Treatment Plant site, including the Headworks Project, the Biosolids Digester Facility Project, and the Power Feed Project, but only the SF Market and 2270 McKinnon

[138] American Legal Publishing Corporation, article 2: Use Districts, Sec. 210.3 PDR Districts, 2019, *http://library.amlegal.com/nxt/gateway. dll/California/planning/planningcode? f=templates$fn=default. htm$3. 0$vid=amlegal: sanfrancisco_ca$sync=1*, accessed August 20, 2019.

Avenue Project could increase employment in the immediate area. Beyond the immediate vicinity of the project site mapped in Figure 22 on p. 44, but within 0.5 mile of the project site, additional light industrial projects near U.S. 101 and I-280, additional SFPUC infrastructure projects near the Southeast Treatment Plant, and small-scale residential projects (single family, duplex units, or accessory dwelling unit applications) near the Palou Phelps Mini Park would be constructed. Employees and/or residents might use the nearby recreational facilities or community gardens once these projects are constructed. The proposed project, combined with the cumulative projects, would not increase the residential population in the immediate project vicinity, so the demand and use of recreational resources would be limited to the onsite employees.

Although the cumulative projects would increase the number of employees in the area, potential use of the nearby parks and community gardens likely would be limited to lunch or midday breaks, and thus would not impose a substantial demand on or use of these resources. Because of the limited use and likely few employees who would use the parks and gardens, the proposed project in combination with cumulative projects are not anticipated to increase use of recreational facilities to such a degree that substantial deterioration of these facilities would occur or be accelerated. Therefore, cumulative recreational impacts would be less than significant, and no mitigation measures are required. Additionally, the proposed project does not include recreational facilities and so does not have the potential to contribute to adverse physical environmental effects related to the construction of recreational facilities. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, employment, operations, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would have the same recreation impacts as the proposed project. Because of the limited use and likely few employees who would use the parks and gardens, the expanded streetscape variant in combination with cumulative projects are not anticipated to increase use of recreational facilities to such a degree that substantial deterioration of these facilities would occur or be accelerated. Therefore, cumulative recreational impacts would be less than significant, and no mitigation measures are required. Additionally, the expanded streetscape variant does not include recreational facilities and so does not have the potential to contribute to adverse physical environmental effects related to the construction of recreational facilities. This topic will not be addressed in the EIR.

## E.12. Utilities and Service Systems

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

The project site is in an urban area that is served by water storage, treatment, and distribution facilities; combined wastewater and stormwater collection, storage, treatment, and disposal facilities; electric power and telecommunication facilities; and solid waste collection and disposal service systems.

**Impact UT-1** **The proposed project or variant would not require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities that could result in environmental effects beyond those evaluated throughout this initial study. (Less than Significant)**

**PROPOSED PROJECT**

The proposed project would not require or result in the construction of new combined wastewater and stormwater main lines or expansion of the existing Southeast Treatment Plant that provides wastewater and stormwater treatment and management for the project site. No single project alone would warrant expansion of the city's water supply system. Consequently, individual projects are considered in combination with other projects, and their individual contribution to cumulative water demand is examined.

Although the proposed project would not require new or expanded water, wastewater treatment, or stormwater drainage improvements, the proposed project would require relocation of or construction of new or expanded onsite utilities and service systems, including new water transmission pipeline, wastewater collection and conveyance facilities, and stormwater facilities. In addition, the proposed project would install new connections to the surrounding PG&E electric grid to provide service to the proposed buildings. The project would also provide connections to communication lines along adjacent roadways. The proposed project would not require new natural gas connections because the project would not use natural gas.

The activities required to install new or expanded onsite utilities are accounted for in the project description as components required to construct the proposed project (e.g., excavation, trenching, and foundations). Physical impacts associated with construction of project-serving utilities and the buildings are included in the evaluation of the project's physical environmental impact described throughout this initial study, including Section E.3, Cultural Resources; Section E.4, Tribal Cultural Resources; Section E.14, Biological Resources; Section E.15, Geology and Soils; Section E.16, Hydrology and Water Quality; and Section E.17, Hazards and Hazardous Material. These components will also be included in the additional analyses of the project's air quality, noise, and transportation impact; these further analyses will be included in the EIR.

Other than localized connections to the existing systems, the proposed project would not result in the construction or relocation of water, wastewater, stormwater, electric, or telecommunications facilities (e.g., electric substations or telecommunication towers). Therefore, this impact would be less than significant, and no mitigation measures would be required. This topic will not be discussed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, employment, operations, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. Therefore, the expanded streetscape variant would have utilities and service system impacts similar to those of the proposed project. Other than localized connections to the existing systems, the expanded streetscape variant would not result in the construction or relocation of water, wastewater, stormwater, electric, or telecommunications facilities (e.g., electric substations or telecommunication towers). Therefore, this impact would be less than significant, and no mitigation measures would be required. This topic will not be discussed in the EIR.

**Impact UT-2 The proposed project or variant would not exceed the capacity of the Southeast Treatment Plant and would not require the construction of new or expansion of existing wastewater and stormwater treatment facilities. (Less than Significant)**

**PROPOSED PROJECT**

The SFPUC owns and operates San Francisco's combined sewer system, which collects and treats both wastewater and stormwater runoff. The Southeast Treatment Plant provides wastewater and stormwater treatment and management for the eastern portion of the city, including the project site. Wastewater is transported to the Southeast Treatment Plant through a grid of transport/storage boxes, sewers, and five major pump stations. The Southeast Treatment Plant treats an average of 60 mgd of dry-weather flow, has a

current dry-weather design capacity of 85.4 mgd, and has a peak wet-weather capacity of 250 mgd.[139, 140] As part of the SSIP, the Southeast Treatment Plant is undergoing operational improvements and seismic upgrades to ensure the reliability of the sewer system.[141] As described below, the proposed project would have a less-than-significant impact on wastewater and stormwater treatment facilities, and no mitigation measures would be required. This topic will not be addressed in the EIR.

***Stormwater***

The project site is completely developed with impervious surfaces. Upon completion of the proposed project, pursuant to the requirements of the San Francisco Stormwater Management Ordinance, the proposed project would reduce the overall amount of impervious surface on the site. This would, in turn, reduce or delay the amount of stormwater entering the city's stormwater collection system in comparison to existing conditions. The San Francisco Stormwater Management Ordinance requirements are further described below.

The San Francisco Stormwater Management Ordinance (as codified in section 147 of the San Francisco Public Works Code) requires projects that create and/or replace at least 5,000 square feet of impervious surface and discharges into the combined sewer system to implement postconstruction stormwater runoff measures consistent with the Stormwater Management Requirements and Design Guidelines. Sites with more than 50 percent impervious surfaces (such as the project site) also must be designed so that the stormwater runoff rate and volume do not exceed predevelopment conditions for the one- and two-year, 24-hour design storm.[142] As discussed in the Water Supply Assessment for this project, the project would request a modified compliance with the first submittal of the Stormwater Control Plan. The modified requirements would be a 40 percent reduction in the rate and a 10 percent reduction in the volume of runoff for the 2-year, 24-hour design storm.[143] To meet these modified requirements, the proposed project would include rainwater collection cisterns that would manage stormwater onsite and limit demand on both the collection system and wastewater facilities resulting from stormwater discharges. A stormwater control plan would be designed for review and approval by the SFPUC (refer to Impact HY-1).

Modified compliance with the Stormwater Management Requirements and Design Guidelines would ensure that stormwater generated by the proposed project is managed onsite so that the proposed project would not substantially contribute polluted runoff to the city's existing stormwater infrastructure. This in turn would reduce the demand on both the collection system and wastewater facilities resulting from stormwater discharge, in comparison to existing conditions, minimizing the potential need for additional treatment capacity. Therefore, stormwater impacts of the proposed project on the Southeast Treatment Plant would be less than significant.

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139 San Francisco Bay Regional Water Quality Control Board, Order No. R2-2013-0029 and NPDES No. CA0037664, 2013, *https://www.waterboards.ca.gov/sanfranciscobay/board_decisions/adopted_orders/2013/R2-2013-0029.pdf*, accessed January 23, 2019.

140 San Francisco Public Utilities Commission (SFPUC), Southeast Treatment Plant, 2018, *http://sfwater.org/index.aspx?page=616*, accessed January 23, 2019.

141 SFPUC, San Francisco's Wastewater Treatment Facilities, June 2014, *http://sfwater.org/modules/showdocument.aspx?documentid=5799*, accessed January 23, 2019.

142 SFPUC, San Francisco Stormwater Management Requirements and Design Guidelines, May 2016, *http://www.sfwater.org/Modules/ShowDocument.aspx?documentID=9026*, accessed January 23, 2019.

143 SFPUC, Water Supply Assessment for San Francisco Gateway Project, adopted June 9, 2020, Resolution No. 20-0126.

### *Wastewater*

SFPUC assumes that nonresidential uses discharge 90 percent of water to the combined sewer.[144] The 90 percent figure is used in these calculations to provide an assessment of the amount of wastewater that would be generated by the project and discharged into the combined sewer system. The proposed project's water supply demand would total 0.006 mgd (0.001 mgd potable demand and 0.005 mgd nonpotable demand); therefore, the proposed project would discharge approximately 0.005 mgd to the combined sewer.[145]

The wastewater generated by the proposed project would contribute an additional 0.008 percent of the Southeast Treatment Plant's average daily treatment of 60 mgd. Because the proposed project would not generate wastewater flows that would exceed the Southeast Treatment Plant's capacity of 85 mgd during dry weather, it would not exceed the Southeast Treatment Plant's capacity or require the construction of new or expansion of existing wastewater treatment facilities. Therefore, wastewater impacts related to the capacity of the combined sewer system would be less than significant.

## EXPANDED STREETSCAPE VARIANT

The expanded streetscape variant comprises the same land uses, employment, operations, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. Because the expanded streetscape variant would not construct additional buildings or add land uses to the site that would generate substantial additional wastewater or require substantial additional stormwater treatment, it would have utilities and service system impacts similar to those of the proposed project. Therefore, the expanded streetscape variant would have a less-than-significant impact on wastewater and stormwater treatment facilities, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**Impact UT-3 SFPUC has sufficient water supply available to serve the proposed project or variant and future development during normal, dry, and multiple dry years. (Less than Significant)**

## PROPOSED PROJECT

### *Background on Hetch Hetchy Regional Water System*

San Francisco's Hetch Hetchy regional water system, operated by the SFPUC, supplies water to approximately 2.7 million people. The system supplies both retail customers—primarily in San Francisco—and 27 wholesale customers in Alameda, Santa Clara, and San Mateo counties. The system supplies an average of 85 percent of its water from the Tuolumne River watershed, stored in Hetch Hetchy Reservoir in Yosemite National Park, and the remaining 15 percent from local surface waters in the Alameda and Peninsula watersheds. The split between these resources varies from year to year depending on hydrological conditions and operational circumstances. Separate from the regional water system, the SFPUC owns and operates an in-city distribution system that serves retail customers in San Francisco. Approximately 97 percent of the San Francisco retail water supply is from the regional system; the remainder consists of local groundwater and recycled water.

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144 SFPUC, Wastewater Service Charge Appeal, 2018, *http://www.sfwater.org/index.aspx?page=132*, accessed January 24, 2019.

145 This wastewater demand from the proposed project does not take into account existing wastewater generation at the site. As a result, the net new wastewater generation from the project site would be less than the 0.005 mgd presented here and thus represents a conservative estimate of the increased demand on the city's combined sewer system.

### *Water Supply Reliability and Drought Planning*

In 2008, the SFPUC adopted the Phased Water System Improvement Program (WSIP) to ensure the ability of the regional water system to meet certain level of service goals for water quality, seismic reliability, delivery reliability, and water supply through 2018.[146] The SFPUC's level of service goals for regional water supply are to meet customer water needs in nondrought and drought periods and to meet dry-year delivery needs while limiting rationing to a maximum of 20 percent system-wide. In approving the WSIP, the SFPUC established a supply limitation of up to 265 mgd to be delivered from its water supply resources in the Tuolumne, Alameda, and Peninsula watersheds in years with normal (average) precipitation.[147] The SFPUC's water supply agreement with its wholesale customers provides that approximately two-thirds of this total (up to 184 mgd) is available to wholesale purchasers and the remaining one-third (up to 81 mgd) is available to retail customers. The total amount of water the SFPUC can deliver to retail and wholesale customers in any one year depends on several factors, including the amount of water that is available from natural runoff, the amount of water in reservoir storage, and the amount of that water that must be released from the system for purposes other than customer deliveries (e.g., required instream flow releases below reservoirs). A "normal year" is based on historical hydrological conditions that allow the reservoirs to be filled by rainfall and snowmelt, allowing full deliveries to customers; similarly, a "wet year" and a "dry year" is based on historical hydrological conditions with above and below "normal" rainfall and snowmelt, respectively.

For planning purposes, the SFPUC uses a hypothetical drought that is more severe than what has historically been experienced. This drought sequence is referred to as the "design drought" and serves as the basis for planning and modeling of future scenarios. The design drought sequence used by the SFPUC for water supply reliability planning is an 8.5-year period that combines the following elements to represent a drought sequence more severe than historical conditions:

- Historical Hydrology – This is a six-year sequence of hydrology from the historical drought that occurred from July 1986 to June 1992.
- Prospective Drought – This is a 2.5-year period that includes the hydrology from the 1976-77 drought.
- System Recovery Period – The last six months of the design drought are the beginning of the system recovery period. The precipitation begins in the fall; by approximately the month of December, inflow to reservoirs exceeds customer demands, and SFPUC system storage begins to recover.

Although the most recent drought (2012 through 2016) included some of the driest years on record for the SFPUC's watersheds, the design drought still represents a more severe drought in duration and overall water supply deficit.

Based on historical records of hydrology and reservoir inflow from 1920 to 2017, current delivery and flow obligations, and fully implemented infrastructure under the WSIP, normal or wet conditions occurred in 85 out of 97 years. This translates into roughly nine normal or wet years out of every 10 years. Conversely, system-wide rationing is required roughly one out of every 10 years. The frequency of dry years is expected to increase as climate change intensifies.

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[146] On December 11, 2018, the SFPUC Commission extended the timing of the WSIP water supply decision through 2028 in its Resolution No. 18-0212.

[147] SFPUC Resolution No. 08-200, *Adoption of the Water System Improvement Program Phased WSIP Variant,* October 30, 2008.

### *2015 Urban Water Management Plan*

The California Urban Water Management Planning Act[148] requires urban water supply agencies to prepare *urban water management plans* to plan for the long-term reliability, conservation, and efficient use of California's water supplies to meet existing and future demands. The act requires water suppliers to update their plans every five years based on projected growth for at least the next 20 years.

At the time the Water Supply Assessment was prepared for the proposed project, the current urban water management plan for the city was the 2015 Urban Water Management Plan update.[149] Subsequently, a 2020 Urban Water Management Plan was adopted, as discussed further below.[150]

The 2015 plan update presents information on the SFPUC's retail and wholesale service areas, the regional water supply system and other water supply systems operated by the SFPUC, system supplies and demands, water supply reliability, Water Conservation Act of 2009 compliance, water shortage contingency planning, and water demand management.

The water demand projections in the 2015 plan reflect anticipated population and employment growth, socioeconomic factors, and the latest conservation forecasts. For San Francisco, housing and employment growth projections are based on the planning department's Land Use Allocation 2012 (see 2015 Urban Water Management Plan, Appendix E, Table 5), which in turn is based on the Association of Bay Area Governments growth projections through 2040.[151] The 2015 plan presents water demand projections in five-year increments over a 25-year planning horizon through 2040.

The 2015 plan compares anticipated water supplies to projected demand through 2040 for normal, single-dry, and multiple-dry water years. Retail water supplies consist of regional water system supply, groundwater, recycled water, and nonpotable water. Under normal hydrologic conditions, the total retail supply is projected to increase from 70.1 mgd in 2015 to 89.9 mgd in 2040. According to the plan, available and anticipated future water supplies would fully meet projected demand in San Francisco through 2040 during normal years.

On December 11, 2018, by Resolution No. 18-0212, the SFPUC amended its 2009 Water Supply Agreement between the SFPUC and its wholesale customers. That amendment revised the Tier 1 allocation in the Water Supply Allocation Plan to require a minimum reduction of 5 percent of the regional water system supply for San Francisco retail customers whenever system-wide reductions are required due to dry-year supply shortages.[152] When accounting for the requirements of this amended agreement, existing and planned supplies would meet projected retail water system demands in all years except for an approximately 3.6 to 6.1 mgd or 5 to 6.8 percent shortfall during dry years through the year 2040. This relatively small shortfall is primarily due to implementation of the amended 2009 water supply agreement. In such an event, the SFPUC would implement the SFPUC's Retail Water Shortage Allocation Plan and could manage this relatively small shortfall by prohibiting certain discretionary outdoor water uses and/or calling for voluntary rationing among all retail customers. Based on experience in past droughts, retail customers could reduce water use

148 California Water Code, division 6, part 2.6, sections 10610 through 10656, as last amended in 2015.
149 SFPUC, *2015 Urban Water Management Plan for the City and County of San Francisco*, June 2016, *https://sfwater.org/index.aspx?page=75*.
150 SFPUC, *2020 Urban Water Management Plan for the City and County of San Francisco*, June 2021, *https://sfpuc.org/about-us/policies-plans/urban-water-management-plan*.
151 Association of Bay Area Governments, *Jobs-Housing Connection Strategy,* May 2012.
152 SFPUC, Resolution No. 18-0212, December 11, 2018.

to meet this projected level of shortfall. The required level of rationing is well below the SFPUC's regional water supply level of service goal of limiting rationing to no more than 20 percent on a system-wide basis.

Based on the 2015 Urban Water Management Plan, as modified by the 2018 amendment to the 2009 Water Supply Agreement, sufficient retail water supplies would be available to serve projected growth in San Francisco through 2040. Although concluding that supply is sufficient, the 2015 Urban Water Management Plan also identifies projects that are underway or planned to augment local supply. Projects that are underway or recently completed include the San Francisco Groundwater Supply Project and the Westside Recycled Water Project. A more current list of potential regional and local water supply projects that the SFPUC is considering is provided below under Additional Water Supplies.

In addition, the plan describes the SFPUC's ongoing efforts to improve dry-year water supplies, including participation in Bay Area regional efforts to improve water supply reliability through projects such as interagency interties, groundwater management and recharge, potable reuse, desalination, and water transfers. Although no specific capacity or supply has been identified, this program may result in future supplies that would benefit SFPUC customers.

***2018 Bay-Delta Plan Amendment***

In December 2018, the State Water Resources Control Board adopted amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary, which establishes water quality objectives to maintain the health of the rivers and the Bay-Delta ecosystem.[153] Among the goals of the adopted Bay-Delta Plan Amendment is to increase salmonid populations in the San Joaquin River, its tributaries (including the Tuolumne River), and the Bay-Delta. Specifically, the plan amendment requires increasing flows in the Stanislaus, Tuolumne, and Merced rivers to 40 percent of unimpaired flow[154] from February through June every year, whether it is wet or dry. During dry years, this would result in a substantial reduction in the SFPUC's water supplies from the Tuolumne River watershed.

If this plan amendment is implemented, the SFPUC would be able to meet the projected retail water demands presented in the 2015 Urban Water Management Plan in normal years but would experience supply shortages in single dry years and multiple dry years. Implementation of the Bay-Delta Plan Amendment would result in substantial dry-year water supply shortfalls throughout the SFPUC's regional water system service area, including San Francisco. The 2015 Urban Water Management Plan assumes that limited rationing for retail customers may be needed in multiple dry years to address an anticipated supply shortage by 2040; the 2018 amendment to the 2009 Water Supply Agreement with wholesale customers would slightly increase rationing levels indicated in the 2015 plan. By comparison, implementation of the Bay-Delta Plan Amendment would result in supply shortfalls in all single dry years and multiple dry years and rationing to a greater degree than previously anticipated to address supply shortages not accounted for in the 2015 Urban Water Management Plan or as a result of the 2018 amendment to the Water Supply Agreement.

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

154 "Unimpaired flow" represents the water production of a river basin, unaltered by upstream diversions, storage, or by export or import of water to or from other watersheds.

The state water board has stated that it intends to implement the plan amendment by the year 2022, assuming that all required approvals are obtained by that time. However, at this time, the implementation of the Bay-Delta Plan Amendment is uncertain for several reasons, as the SFPUC explained in the Water Supply Assessment prepared for this project. First, since adoption of the Bay-Delta Plan Amendment, more than a dozen lawsuits have been filed in state and federal court, challenging the water board's adoption of the plan amendment, including legal challenges filed by the federal government at the request of the United States Bureau of Reclamation. That litigation is in the early stages, and there have been no dispositive court rulings as of this date.

Second, the Bay-Delta Plan Amendment is not self-executing and does not allocate responsibility for meeting its new flow requirements to the SFPUC or any other water rights holders. Rather, the plan amendment merely provides a regulatory framework for flow allocation, which must be accomplished by other regulatory and/or adjudicatory proceedings, such as a comprehensive water rights adjudication or, in the case of the Tuolumne River, the Clean Water Act, section 401 certification process in the Federal Energy Regulatory Commission's relicensing proceeding for Don Pedro Dam. The license amendment process is currently expected to be completed in the 2022-2023 timeframe. This process and other regulatory and/or adjudicatory proceedings would likely face legal challenges and have lengthy timelines, and quite possibly could result in a different assignment of flow responsibility for the Tuolumne River than currently exists (and therefore a different water supply effect on the SFPUC).

Third, in recognition of the obstacles to implementation of the Bay-Delta Plan Amendment, the water board directed its staff to help complete a "Delta watershed-wide agreement, including potential flow measures for the Tuolumne River" by March 1, 2019, and to incorporate such agreements as an "alternative" for a future amendment to the Bay-Delta Plan to be presented to the [water board] as early as possible after December 1, 2019." On March 1, 2019, in accordance with the water board's instruction, and in partnership with other key stakeholders, the SFPUC submitted a proposed project description for the Tuolumne River. This project description could be the basis for a voluntary agreement with the state water board that would serve as an alternative path to implementing the Bay-Delta Plan's objectives. On March 26, 2019, the SFPUC adopted Resolution No. 19-0057 to support its participation in the voluntary agreement negotiation process. In a written progress report to the Voluntary Agreement Plenary Participants dated July 1, 2019, the California secretaries for Environmental Protection and for Natural Resources stated that the collective state agencies should be able "to determine the adequacy" of the various proposed voluntary agreements, including the proposed Tuolumne Voluntary Agreement, by October 15, 2019, and that if the state team recommends the voluntary agreements to the state water board, then (1) scientific peer review of the voluntary agreements would be completed by the spring of 2020, and (2) a draft CEQA document would be released for public comment in the summer of 2020, with a finalized CEQA document completed the following year. Negotiations for the Tuolumne Voluntary Agreement continued beyond the October 15, 2019, date and are ongoing, pushing back the completion timeline anticipated in the July 1, 2019, letter. On February 4, 2020, the secretaries for Environmental Protection and for Natural Resources issued a presentation summarizing the framework of the voluntary agreement process, which did not include new deadlines for completion.

For these reasons, it is currently unknown whether, when, and in what form the Bay-Delta Plan Amendment would be implemented, and how those amendments would affect the SFPUC's water supply.

### *Additional Water Supplies*

In light of the adoption of the Bay-Delta Plan Amendment and the resulting potential limitation to the SFPUC's regional water system supply during dry years, the SFPUC is expanding and accelerating its efforts to develop additional water supplies and explore other projects that would improve overall water supply resilience. Developing these supplies would reduce water supply shortfalls and reduce rationing associated with such shortfalls. The SFPUC has taken action to fund the study of additional water supply projects, which are described in the water supply assessment for the proposed project and listed below:

- Daly City Recycled Water Expansion
- Alameda County Water District Transfer Partnership
- Brackish Water Desalination in Contra Costa County
- Alameda County Water District-Union Sanitary District Purified Water Partnership
- Crystal Springs Purified Water
- Eastside Purified Water
- San Francisco Eastside Satellite Recycled Water Facility
- Additional Storage Capacity in Los Vaqueros Reservoir from Expansion
- Calaveras Reservoir Expansion

The capital projects that are under consideration would be costly and are still in the early feasibility or conceptual planning stages. These projects would take 10 to 30 or more years to implement and would require environmental permitting negotiations, which may reduce the amount of water that can be developed. The yield from these projects is unknown and not currently incorporated into SFPUC's supply projections.

In addition to capital projects, the SFPUC is also considering developing related water demand management policies and ordinances, such as funding for innovative water supply and efficiency technologies and requiring potable water offsets for new developments.

### *Water Supply Assessment*

Under sections 10910 through 10915 of the California Water Code, urban water suppliers like the SFPUC must prepare water supply assessments for certain large projects, as defined in CEQA Guidelines section 15155.[155] Water supply assessments rely on information contained in the water supplier's urban water management plan and on the estimated water demand of both the proposed project and projected growth in the relevant portion of the water supplier's service area. Because the proposed project would include development of more than 650,000 square feet of PDR uses and would employ more than 1,000

[155] Pursuant to CEQA Guidelines section 15155(1), "a water-demand project" means:
(A) A residential development of more than 500 dwelling units
(B) A shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space
(C) A commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor area
(D) A hotel or motel, or both, having more than 500 rooms, an industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area
(F) A mixed-use project that includes one or more of the projects specified in subdivisions (a)(1)(A), (a)(1)(B), (a)(1)(C), (a)(1)(D), (a)(1)(E), and (a)(1)(G) of this section
(G) A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project

people, it meets the definition of a water demand project under CEQA. Accordingly, the SFPUC adopted a water supply assessment for the proposed project on June 9, 2020.[156]

The water supply assessment for the proposed project identifies the project's total water demand, including a breakdown of potable and nonpotable water demands. The proposed project is subject to San Francisco's Non-Potable Water Ordinance (article 12C of the San Francisco Health Code). As of January 1, 2022, the Non-Potable Water Ordinance requires new commercial, mixed-use, and multi-family residential development projects with 100,000 square feet or more of gross floor area to install and operate an onsite nonpotable water system. Such projects must meet their toilet and urinal flushing and irrigation demands through the collection, treatment, and use of available graywater, rainwater, and foundation drainage. Although not required, projects may use treated blackwater or stormwater if desired. Furthermore, projects may choose to apply nonpotable water to other nonpotable water uses, such as cooling tower blowdown and industrial processes, but are not required to do so under the ordinance. The proposed project would meet the requirements of the Non-Potable Water Ordinance by using graywater and rainwater for toilet and urinal flushing and irrigation.

Both potable and nonpotable demands for the project were estimated using the SFPUC's Non-Potable Water Calculator and supplemented with additional calculations for cooling tower makeup water, swimming pool, and commercial laundry demands. According to the demand estimates, the project's total water demand would be 0.006 mgd, which would consist of 0.001 mgd of potable water and 0.005 mgd of nonpotable water.[157] Accordingly, 84.8 percent of the project's total water demand would be met by nonpotable water.

The water supply assessment estimates future retail (citywide) water demand through 2040 based on the population and employment growth projections contained in the planning department's Land Use Allocation 2012. The department has determined that the proposed project represents a portion of the planned growth accounted for in Land Use Allocation 2012. Therefore, the project's demand is incorporated in the 2015 Urban Water Management Plan.

The water supply assessment determined that the project's potable water demand of 0.001 mgd would contribute 0.001 percent to the projected total retail demand of 89.9 mgd in 2040. The project's total water demand of 0.006 mgd, which does not account for the 0.005 mgd savings anticipated through compliance with the nonpotable water ordinance, would represent 0.007 percent of 2040 total retail demand. Therefore, the proposed project represents a small fraction of the total projected water demand in San Francisco through 2040.

Due to the 2018 Bay Delta Plan Amendments, the water supply assessment considers these demand estimates under three water supply scenarios. To evaluate the ability of the water supply system to meet the demand of the proposed project in combination with both existing development and projected growth in San Francisco, the water supply assessment describes each of the following water supply scenarios:

- Scenario 1: Current Water Supply
- Scenario 2: Bay-Delta Plan Voluntary Agreement
- Scenario 3: 2018 Bay-Delta Plan Amendment

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156 SFPUC, *Water Supply Assessment for the San Francisco Gateway Project*, adopted June 9, 2020, Resolution No. 20-0126.
157 SFPUC, *Water Supply Assessment for San Francisco Gateway Project*, adopted June 9, 2020, Resolution No. 20-0126.

As discussed below, the water supply assessment concludes that water supplies would be available to meet the demand of the proposed project in combination with both existing development and projected growth in San Francisco through 2040 under each of these water supply scenarios, with varying levels of rationing during dry years. The following sections summarize the analysis and conclusions presented in the SFPUC's water supply assessment for the project under each of the three water supply scenarios considered.

***Scenario 1 – Current Water Supply***

Scenario 1 assumes no change to the way in which water is supplied, and that neither the Bay-Delta Plan Amendment nor a Bay-Delta Plan Voluntary Agreement would be implemented. Thus, the water supply and demand assumptions contained in the 2015 Urban Water Management Plan and the 2009 Water Supply Agreement as amended would remain applicable for the project's water supply assessment. As stated above, the project is accounted for in the demand projections in the 2015 Urban Water Management Plan.

Under Scenario 1, the water supply assessment determined that water supplies would be available to meet the demand of the project in combination with existing development and projected growth in all years, except for an approximately 3.6 to 6.1 mgd or 5 to 6.8 percent shortfall during dry years through the year 2040. This relatively small shortfall is primarily due to implementation of the amended 2009 Water Supply Agreement. To manage a small shortfall such as this, the SFPUC may prohibit certain discretionary outdoor water uses and/or call for voluntary rationing by its retail customers. During a prolonged drought at the end of the 20-year planning horizon, the project could be subject to voluntary rationing in response to a 6.8 percent supply shortfall, when the 2018 amendments to the 2009 Water Supply Agreement are taken into account. This level of rationing is well within the SFPUC's regional water system's supply level of service goal of limiting rationing to no more than 20 percent on a system-wide basis (i.e., an average throughout the regional water system).

***Scenario 2 – Bay-Delta Plan Voluntary Agreement***

Under Scenario 2, a voluntary agreement would be implemented as an alternative to the adopted Bay-Delta Plan Amendment. The March 1, 2019, proposed voluntary agreement submitted to the state water board has yet to be accepted, and the shortages that would occur with its implementation are not known. The voluntary agreement proposal contains a combination of flow and non-flow measures that are designed to benefit fisheries at a lower water cost, particularly during multiple dry years, than would occur under the Bay-Delta Plan Amendment. The resulting regional water system supply shortfalls during dry years would be less than those under the Bay-Delta Plan Amendment and would require rationing of a lesser degree and closer in alignment to the SFPUC's adopted level of service goal for the regional water system of rationing of no more than 20 percent system-wide during dry years. The SFPUC Resolution No. 19-0057, which authorized the SFPUC staff to participate in voluntary agreement negotiations, stated its intention that any final voluntary agreement allow the SFPUC to maintain both the water supply and sustainability level of service goals and objectives adopted by the SFPUC when it approved the WSIP. Accordingly, it is reasonable to conclude that if the SFPUC enters into a voluntary agreement, the supply shortfall under such an agreement would be of a similar magnitude to those that would occur under Scenario 1. In any event, the rationing that would be required under Scenario 2 would be of a lesser degree than under the Bay-Delta Plan Amendment as adopted.

### *Scenario 3 – Bay-Delta Plan Amendment*

Under Scenario 3, the 2018 Bay-Delta Plan Amendment would be implemented as it was adopted by the state water board, without modification. As discussed above, there is considerable uncertainty whether, when, and in what form the plan amendment would be implemented. However, because implementation of the plan amendment cannot be ruled out at this time, an analysis of the cumulative impact of projected growth on water supply resources under this scenario is included in this document to provide a worst-case impact analysis.

Under this scenario, which is assumed to be implemented after 2022, water supplies would be available to meet projected demands through 2040 in wet and normal years with no shortfalls. However, under Scenario 3, the entire regional water system—including both the wholesale and retail service areas—would experience significant shortfalls in single dry and multiple dry years, which over the past 97 years have occurred on average just over once every 10 years. Significant dry-year shortfalls would occur in San Francisco, regardless of whether the proposed project is constructed. Except for the currently anticipated shortfall to retail customers of about 6.1 mgd (6.8 percent) that is expected to occur under Scenario 1 during years seven and eight of the 8.5-year design drought, based on 2040 demand levels; these shortfalls to retail customers would exclusively result from supply reductions resulting from implementation of the Bay-Delta Plan Amendment. The retail supply shortfalls under Scenario 3 would not be attributed to the incremental demand associated with the proposed project, because the project's demand is incorporated already in the growth and water demand/supply projections contained in the 2015 Urban Water Management Plan.

Under the Bay-Delta Plan Amendment, existing and planned dry-year supplies would be insufficient for the SFPUC to satisfy its regional water system supply level of service goal of no more than 20 percent rationing system-wide. The Water Shortage Allocation Plan does not specify allocations to retail supply during system-wide shortages above 20 percent. However, the plan indicates that if a system-wide shortage greater than 20 percent were to occur, regional water system supply would be allocated between retail and wholesale customers in accordance with the rules corresponding to a 16 to 20 percent system-wide reduction, subject to consultation and negotiation between the SFPUC and its wholesale customers to modify the allocation rules. The allocation rules corresponding to the 16 to 20 percent system-wide reduction are reflected in the project's water supply assessment. These allocation rules result in shortfalls of 15.6 to 49.8 percent across the retail service area as a whole under Scenario 3. As shown in Table 5 of the water supply assessment, total shortfalls under Scenario 3 would range from 12.3 mgd (15.6 percent) in a single dry year to 36.1 mgd (45.7 percent) in years seven and eight of the 8.5-year design drought, based on 2025 demand levels; and from 21 mgd (23.4 percent) in a single dry year to 44.8 mgd (49.8 percent) in years seven and eight of the 8.5-year design drought, based on 2040 demand.

### *2020 Urban Water Management Plan*

As described above, following adoption of the Water Supply Assessment for the proposed project, the SFPUC adopted a 2020 Urban Water Management Plan.[158] The plan projects water demand through 2045, based on the population and employment growth projections contained in the planning department's Land Use Allocation 2017.[159] The department has determined that the proposed project represents a portion of the

[158] SFPUC, *2020 Urban Water Management Plan for the City and County of San Francisco*, June 2021, *https://sfpuc.org/about-us/policies-plans/urban-water-management-plan*.

[159] *2020 Urban Water Management Plan* at 4-4.

planned growth accounted for in Land Use Allocation 2017. Therefore, the project's demand is incorporated in the 2020 Urban Water Management Plan.

The 2020 plan incorporates water supply and demand planning scenarios both with and without the Bay-Delta Plan Amendment, consistent with the approach in the proposed project's Water Supply Assessment. Without implementation of the Bay-Delta Plan Amendment, water supplies would be available to meet projected retail demands, including planned growth, in all years—except for an approximately 4.0 mgd or 5.3 percent shortfall during years four and five of multiple dry year conditions in the year 2045, as shown in Table 8-6 of the 2020 Urban Water Management Plan. This shortfall, which is consistent with the potential 2040 shortfall analyzed in Scenario 1 of the project's Water Supply Assessment, would be addressed by a 5 percent reduction in retail demand.

With implementation of the Bay-Delta Plan Amendment, water supplies would be available to meet projected demands through 2045 in normal years with no shortfalls. However, the entire regional water system—including both the wholesale and retail service areas—would experience significant shortfalls in single dry and multiple dry years. Significant dry-year shortfalls would occur in San Francisco, regardless of whether the proposed project is constructed. As shown in Table 8-4 of the 2020 Urban Water Management Plan, total shortfalls under this scenario would range from 11.2 mgd (15.9 percent) in a single dry year to 19.2 mgd (27.2 percent) in years two through five of multiple dry year conditions, based on 2040 demand levels; and from 20.5 mgd (25.4 percent) in a single dry year to 28.5 mgd (35.4 percent) in years four and five of multiple dry year conditions, based on 2045 demand. These shortfalls are within the ranges of the potential 2025-2040 shortfalls analyzed in Scenario 3 of the project's Water Supply Assessment.

The 2020 Urban Water Management Plan incorporates a Water Shortage Contingency Plan (Appendix K) that identifies specific actions that would be taken in response to shortage conditions, including demand reduction, operational efficiency, and supply augmentation actions; it also includes a Retail Water Shortage Allocation Plan, discussed further below.

***Impact Analysis***

As described above, the supply capacity of the Hetch Hetchy regional water system that provides the majority of the city's drinking water far exceeds the potential demand of any single development project in San Francisco. No single development project alone in San Francisco would require the development of new or expanded water supply facilities or require the SFPUC to take other actions, such as imposing a higher level of rationing across the city in the event of a supply shortage in dry years. Therefore, a separate project-only analysis is not provided for this topic. The following analysis instead considers whether the proposed project, in combination with both existing development and projected growth through 2040, would require new or expanded water supply facilities, the construction or relocation of which could have significant cumulative impacts on the environment. It also considers whether a high level of rationing would be required that could have significant cumulative impacts. It is only under this cumulative context that development in San Francisco could have the potential to require new or expanded water supply facilities or require the SFPUC to take other actions, which in turn could result in significant physical environmental impacts related to water supply. If significant cumulative impacts could result, then the analysis considers whether the project would make a considerable contribution to the cumulative impact.

Impacts Related to New or Expanded Water Supply Facilities

The SFPUC's adopted water supply level of service goal for the regional water system is to meet customer water needs in nondrought and drought periods. The system performance objective for drought periods is to meet dry-year delivery needs while limiting rationing to a maximum of 20 percent system-wide reduction in regional water service during extended droughts. Because the SFPUC has designed its system to meet this goal, it is reasonable to assume that, to the extent the SFPUC can achieve its service goals, sufficient supplies would be available to serve existing development and planned growth accounted for in the 2020 Urban Water Management Plan (which includes the proposed project) and that new or expanded water supply facilities are not needed to meet system-wide demand. Although the focus of this analysis is on the SFPUC's retail service area and not the regional water system as a whole, this cumulative analysis considers the SFPUC's regional water supply level of service goal of rationing of not more than 20 percent in evaluating whether new or expanded water supply facilities would be required to meet the demands of existing development and projected growth in the retail area through 2045. If a shortfall would require rationing more than 20 percent to meet system-wide dry-year demand, the analysis evaluates whether, as a result, the SFPUC would develop new or expanded water supply facilities that result in significant physical environmental impacts. It also considers whether such a shortfall would result in a level of rationing that could cause significant physical environmental impacts. If the analysis determines that there would be a significant cumulative impact, then, in accordance with CEQA Guidelines section 15130, the analysis considers whether the project's incremental contribution to any such effect is "cumulatively considerable."

As discussed above, existing and planned dry-year supplies would meet projected retail demands through 2040 under Scenario 1 in the SFPUC's regional water system's adopted water supply reliability level of service goal. As augmented by the projections in the 2020 Urban Water Management Plan, water demand would be met during multiple dry-year conditions in 2045 by implementing 5 percent retail demand reductions. Therefore, the SFPUC could meet the water supply needs for the proposed project in combination with existing development and projected growth in San Francisco through 2045 from the SFPUC's existing system. The SFPUC would not be expected to develop new or expanded water supply facilities for retail customers under Scenario 1, and there would be no significant cumulative environmental impact.

The effect of Scenario 2 cannot be quantified at this time; but, as explained previously, if it can be designed to achieve the SFPUC's level of service goals and is adopted, it would be expected to have effects similar to those under Scenario 1. Given the SFPUC's stated goal of maintaining its level of service goals under Scenario 2, it is expected that effects under Scenario 2 would be more similar to those under Scenario 1 than under Scenario 3. In any event, any shortfall effects under Scenario 2 that exceed the SFPUC's service goals would be expected to be less than those under Scenario 3. Therefore, the analysis of Scenario 3 would encompass any effects that would occur under Scenario 2 if it were to trigger the need for increased water supply or rationing in excess of the SFPUC's regional water system level of service goals.

Under Scenario 3, the SFPUC's existing and anticipated water supplies would be sufficient to meet the demands of existing development and projected growth in San Francisco, including the proposed project, through 2045 in wet and normal years, which have historically occurred in approximately nine out of 10 years on average. During dry and multiple dry years, as identified in the 2020 Urban Water Management Plan, retail supply shortfalls of 15.9 to 35.4 percent could occur.

The SFPUC has indicated in its water supply assessment and 2020 Urban Water Management Plan that, as a result of the adoption of the Bay-Delta Plan Amendment and the resulting potential limitations on supply to the regional water system during dry years, the SFPUC is increasing and accelerating its efforts to develop additional water supplies and explore other projects that would increase overall water supply resilience. It lists possible projects that it will study. The SFPUC is beginning to study water supply options, but it has not determined the feasibility of the possible projects, has not made any decision to pursue any particular supply projects, and has determined that the identified potential projects would take anywhere from 10 to 30 years or more to implement.

There is also a substantial degree of uncertainty associated with the implementation of the Bay-Delta Plan Amendment and its ultimate outcome; therefore, there is substantial uncertainty in the amount of additional water supply that may be needed, if any. Moreover, there is uncertainty and lack of knowledge regarding the feasibility and parameters of the possible water supply projects the SFPUC is beginning to explore. Consequently, the physical environmental impacts that could result from future supply projects can only be speculated on at this time and would not be expected to be reasonably determined for 10 to 30 years. Although it is not possible at this time to identify the specific environmental impacts that could result, this analysis assumes that if new or expanded water supply facilities were developed, such as those listed above under "Additional Water Supplies," the construction and/or operation of such facilities could result in significant adverse environmental impacts, and this would be a significant cumulative impact.

As discussed above, the proposed project would represent 0.007 percent of total demand and 0.001 percent of potable water demand in San Francisco in 2040, whereas implementation of the Bay Delta Plan Amendment would result in a retail supply shortfall of up to 49.8 percent. Thus, new or expanded dry-year water supplies would be needed under Scenario 3 regardless of whether the proposed project is constructed. This being the case, any physical environmental impacts related to the construction and/or operation of new or expanded water supplies would occur with or without the proposed project. Therefore, the proposed project would not have a considerable contribution to any significant cumulative impacts that could result from the construction or operation of new or expanded water supply facilities developed in response to the Bay-Delta Plan Amendment.

### Impacts Related to Rationing

Given the long lead times associated with developing additional water supplies, in the event the Bay-Delta Plan Amendment were to take effect sometime after 2022 and result in a dry-year shortfall, the expected action of the SFPUC for the next 10 to 30 years (or more) would be limited to requiring increased rationing. The remaining analysis therefore focuses on whether rationing at the levels that might be required under the Bay-Delta Plan Amendment could result in any cumulative impacts, and if so, whether the project would make a considerable contribution to these impacts.

The SFPUC has established a process through its Retail Water Shortage Allocation Plan for actions it would take under circumstances requiring rationing. Rationing at the level that might be required under the Bay-Delta Plan Amendment would require changes to how businesses operate, changes to water use behaviors (e.g., shorter and/or less-frequent showers), and restrictions on irrigation and other outdoor water uses (e.g., car washing), all of which could lead to undesirable socioeconomic effects. Any such effects would not constitute physical environmental impacts under CEQA.

High levels of rationing could, however, lead to adverse physical environmental effects, such as the loss of vegetation cover resulting from prolonged restrictions on irrigation. Prolonged high levels of rationing in the

city could also make San Francisco a less desirable location for residential and commercial development than other areas of the state not subject to such substantial levels of rationing, which, depending on location, could lead in turn to increased urban sprawl. Sprawl development is associated with numerous environmental impacts, including, for example, increased greenhouse gas emissions and air pollution from longer commutes and lower density development, higher energy use, loss of farmland, and increased water use from less water-efficient suburban development.[160] In contrast, the proposed project is in an area where VMT per capita are well below the regional average; projects in San Francisco are required to comply with numerous regulations that would reduce greenhouse gas emissions, as discussed in the greenhouse gas section of this initial study; and San Francisco's per capita water use is among the lowest in the state. Thus, the higher levels of rationing on a citywide basis that could be required under the Bay-Delta Plan Amendment could lead directly or indirectly to significant cumulative impacts. The question, then, is whether the project would make a considerable contribution to impacts that may be expected to occur in the event of high levels of rationing.

Although the levels of rationing described above apply to the retail service area as a whole (i.e., 5.3 percent under Scenario 1, and 15.9 to 35.4 percent under Scenario 3, each as augmented by the 2020 Urban Water Management Plan), the SFPUC may allocate different levels of rationing to individual retail customers based on customer type (e.g., dedicated irrigation, single-family residential, multi-family residential, or commercial) to achieve the required level of retail (city-wide) rationing. Allocation methods and processes that have been considered in the past and may be used in future droughts are described in the SFPUC's current Retail Water Shortage Allocation Plan adopted as part of the 2020 Urban Water Management Plan.[161] The updated Retail Water Shortage Allocation Plan will allocate shortages to different customer types to minimize the economic impacts of mandatory demand reductions. The specific allocation method will be determined based on the nature of the water shortage and water use trends, and may include reference to baseline water use levels.

The SFPUC anticipates that, as a worst-case scenario under Scenario 3, because the proposed project would have more than 650,000 square feet of PDR uses and would employ more than 1,000 people, the proposed project could be subject to up to 30 percent rationing during a severe drought.[162] In accordance with the Retail Water Shortage Allocation Plan, the level of rationing that would be imposed on the proposed project would be determined at the time of a drought or other water shortage and cannot be established with certainty prior to the shortage event. However, newly constructed buildings, such as the proposed project, have water-efficient fixtures and nonpotable water systems that comply with the latest regulations. Consequently, if these buildings can demonstrate below-average baseline water use, they may be subject to a lower level of rationing than other retail customers that meet or exceed the average water use for the same customer class.

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160 Pursuant to the SFPUC 2015 Urban Water Management Plan, San Francisco's per capita water use is among the lowest in the state.

161 SFPUC, *2020 Urban Water Management Plan for the City and County of San Francisco, Appendix Water Shortage Contingency Plan,* section 4. June 2021.

162 This worst-case rationing level for San Francisco multi-family residential was estimated for the purpose of preparing comments on the Draft Substitute Environmental Document in Support of Potential Changes to the Bay-Delta Plan (SED), dated March 16, 2017. See comment letter Attachment 1, Appendix 3, Page 5, Table 3. The comment letter and attachments are available at: *https://www.waterboards.ca.gov/public_notices/comments/2016_baydelta_plan_amendment/docs/dennis_herrera.pdf*. The state water board's SED assumes that the city will develop additional water supplies through large scale water transfers and/or construction of a large-scale desalination plant or new in-Delta diversion. The city's comments on the SED explain why increased rationing is in fact the SFPUC's most reasonably foreseeable response to the water supply reductions that may result from Bay-Delta Plan Amendment.

Although any substantial reduction in water use in a new, water-efficient building likely would require behavioral changes that building occupants would find inconvenient, temporary rationing during a drought is expected to be achievable through actions that would not cause or contribute to significant environmental effects. The effect of such temporary rationing would likely cause occupants to change behaviors but would not cause the substantial loss of vegetation because vegetation on this urban infill site would be limited to ornamental landscaping, and nonpotable water supplies would remain available for landscape irrigation in dry years. The project would not include uses that would be forced to relocate because of temporary water restrictions, such as a business that relies on significant volumes of water for its operations. Although high levels of rationing that would occur under Scenario 3 could result in future development locating elsewhere, existing PDR tenants and businesses occupying the proposed project would be expected to tolerate rationing for the temporary duration of a drought.

As discussed above, implementation of the Bay-Delta Plan Amendment would result in substantial system-wide water supply shortfalls in dry years. These shortfalls would occur with or without the proposed project, and the project's incremental increase in potable water demand (0.001 percent of total retail demand) would have a negligible effect on the levels of rationing that would be required throughout San Francisco under Scenario 3 in dry years.

Temporary rationing that could be imposed on the project would not cause or contribute to significant environmental effects associated with the high levels of rationing that may be required on a city-wide basis under Scenario 3. Therefore, the project would not make a considerable contribution to any significant cumulative impacts that may result from increased rationing that may be required with implementation of the Bay-Delta Plan Amendment, were it to occur.

***Conclusion***

As stated above, there is considerable uncertainty as to whether the Bay-Delta Plan Amendment will be implemented. If the plan amendment is implemented, the SFPUC will need to impose higher levels of rationing than its regional water system level of service goal of no more than 20 percent rationing during drought years by 2025 and for the next several decades. Implementation of the plan amendment would result in a shortfall beginning in a single dry year in 2025 of 15.9 percent; and dry-year shortfalls by 2045 ranging from 25.4 percent in a single dry year and year one of multiple dry years, to up to 35.4 percent in years four and five. Although the SFPUC may seek new or expanded water supply facilities, it has not made any definitive decision to pursue particular actions and there is too much uncertainty associated with this potential future decision to identify environmental effects that would result. Such effects are therefore speculative at this time. In any case, the need to develop new or expanded water supplies in response to the Bay Delta Plan Amendment and any related environmental impacts would occur irrespective of the water demand associated with the proposed project. Given the long lead times associated with developing additional supplies, the SFPUC's expected response to implementation of the Bay-Delta Plan Amendment would be to ration in accordance with procedures in its Retail Water Shortage Allocation Plan.

Both direct and indirect environmental impacts could result from high levels of rationing. However, the project is a mixed-use urban infill development that would be expected to tolerate the level of rationing imposed on it for the duration of the drought, and so would not contribute to sprawl development caused by rationing under the Bay-Delta Plan Amendment. The project itself would not be expected to contribute to a loss of vegetation because project-generated nonpotable supplies would remain available for irrigation in dry years. Nor would the small increase in potable water demand attributable to the project compared to

citywide demand substantially affect the levels of dry-year rationing that would otherwise be required throughout the city. Thus, the proposed project would not make a considerable contribution to a cumulative environmental impact caused by implementation of the Bay-Delta Plan Amendment. Therefore, for the reasons described above, under all three scenarios, this impact would be considered less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, employment, operations, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The proposed expanded streetscape variant would have water supply impacts similar to those of the proposed project because it would not construct additional buildings or add uses that would require substantial additional water supply, although it would involve additional street trees. Therefore, this impact would be considered less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**Impact UT-4** **The proposed project or variant would not generate solid waste in excess of state or local standards, or in excess of capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and would comply with applicable waste management and reduction statutes and regulations related to solid waste. (Less than Significant)**

**PROPOSED PROJECT**

Recology provides solid waste collection, recycling, and disposal services for residential and commercial garbage, recycling, and composting in San Francisco through its subsidiaries, Golden Gate Disposal and Recycling and Sunset Scavenger. Materials are collected and hauled to the Recology transfer station/ recycling center at 501 Tunnel Avenue, near the southeastern city limit, for sorting and subsequent transportation to other facilities. Recyclable materials are taken to Recology's Pier 96 facility, where they are separated into commodities (e.g., aluminum, glass, and paper) and transported to other users for reprocessing. Compostables (e.g., food waste, plant trimmings, and soiled paper) are transferred to a Recology composting facility in Solano County, where they are converted to soil amendment and compost. The remaining material that cannot otherwise be reprocessed ("trash") is transported to landfills.[163]

In September 2015, the city approved an agreement with Recology, Inc., for the transport and disposal of the city's municipal solid waste at the Recology Hay Road Landfill, northeast of Vacaville in Solano County. The city began disposing the majority of its municipal solid waste at this landfill in January 2016, and is anticipated to continue for approximately nine years, or until 3.4 million tons of municipal solid waste have been deposited in that landfill, whichever comes first. The city would have an option to renew the agreement for a period of six years, or until an additional 1.6 million tons of municipal solid waste have been deposited in the landfill, whichever comes first.[164]

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[163] San Francisco Planning Department, Agreement for Disposal of San Francisco Municipal Solid Waste at Recology Hay Road Landfill in Solano County Final Negative Declaration, Case No. 2014.0653E, July 2015, *http://sfmea.sfplanning.org/2014.0653E_Revised_FND.pdf*, accessed January 21, 2019.

[164] San Francisco Planning Department, Agreement for Disposal of San Francisco Municipal Solid Waste at Recology Hay Road Landfill in Solano County Final Negative Declaration, Case No. 2014.0653E, July 2015, *http://sfmea.sfplanning.org/2014.0653E_Revised_FND.pdf*, accessed January 21, 2019.

According to CalRecycle, the Recology Hay Road Landfill has a permitted maximum daily disposal capacity of 2,400 tons per day, a total maximum permitted capacity of 37.0 million cubic yards, and a remaining permitted capacity of approximately 30.4 million cubic yards (or 82 percent of its permitted capacity); and an estimated closure date of January 1, 2077.[165]

The California Integrated Waste Management Board requires local agencies to implement source reduction, recycling, and composting that would result in a minimum of 50 percent diversion of solid waste from landfills, thereby extending the life of landfills. For 2017, the target solid waste generation rate for San Francisco was 10.6 pounds per day per employee, and the actual measured generation rate was 4.7 pounds per day per employee, which is less than the target solid waste generation rate.[166]

San Francisco set a goal of 75 percent solid waste diversion by 2010, which it exceeded at 80 percent diversion, and currently has a goal of 100 percent solid waste diversion or "zero waste" to landfill or incineration by 2020. As discussed below, San Francisco implements recycling, composting, and waste reduction programs that would support this goal of 100 percent solid waste diversion.

***Construction***

Demolition and construction activities would generate various types of solid waste, including scrap lumber, scrap finishing materials, scrap metals, and other recyclable and nonrecyclable solid waste. Construction-related activities would involve soil disturbance of approximately 134,000 cubic yards onsite and 6,600 cubic yards for the street improvements, with approximately 98,000 cubic yards exported offsite. Excavated soil and demolition debris that is contaminated (e.g., with asbestos, polychlorinated biphenyls, or lead-based paint) and classified as a hazardous waste would be taken to a class I facility for disposal in accordance with applicable laws and regulations for the disposal of hazardous waste (see Section E.17, Hazards and Hazardous Materials, for further discussion). Soils not classified as hazardous waste would be transported to local disposal and reuse sites such as Treasure Island, Bay Meadows, or other available sites. Any nonrecyclable material would be disposed of at the Recology Hay Road Landfill.

The Construction and Demolition Debris Recovery Ordinance (San Francisco Ordinance No. 27-06) requires all contractors to prepare a Demolition Debris Recovery Plan. The recovery plan must demonstrate that waste entering landfill facilities from the proposed project would be reduced by a minimum of 65 percent by weight through recycling. The recovery plan must identify the sources of recyclable materials, outline a recycling method (self-separation or mixed recovery), and identify a Registered Transporter to haul mixed construction and demolition debris offsite to a Registered Facility for sorting and recycling. The recovery plan must be submitted to and approved by the San Francisco's Department of the Environment.[167]

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165 California Department of Resources Recycling and Recovery, Facility Detail: Recology Hay Road Landfill (48-AA-0002), 2019, *https://www2.calrecycle.ca.gov/swfacilities/Directory/48-AA-0002*, accessed January 21, 2019.

166 California Department of Resources Recycling and Recovery, Jurisdiction Diversion/Disposal Rate Detail, San Francisco, 2018, *https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/JurisdictionDiversionDetail?year=2017&jurisdictionID=438*, accessed January 21, 2019.

167 San Francisco's Department of Environment, Construction and Demolition Debris Recovery Requirements, 2017, *https://sfenvironment.org/construction-demolition-requirements*, accessed January 21, 2019.

In addition, the 2019 California Green Building Standards Code (the CALGreen Code) requires that 100 percent of trees, stumps, rocks, and associated vegetation and soils resulting primarily from land clearing be reused or recycled.[168]

***Operation***

The proposed project's four main types of PDR uses include manufacturing and maker space, parcel delivery and last-mile delivery, wholesale and storage, and fleet management, and other uses permitted in the PDR-2 district, such as laboratory or retail uses. San Francisco's Mandatory Recycling and Composting Ordinance (San Francisco Ordinance No. 100-09) requires all properties and everyone in the city to separate their recyclables, compostables, and landfill trash.[169] Property owners and managers are required to provide color-coded, labeled bins in convenient locations. Education must also be provided to employees, contractors, and janitors on how to source separate recyclables, compostables, and trash. Recycling, composting, and waste reduction are expected to increasingly divert waste from landfills in accordance with California and local requirements.

CalRecycle estimates that the measured solid waste generation rate in San Francisco in 2017 was 4.7 pounds per day per employee.[170] Under the proposed project, a net increase of up to 1,242 employees would be onsite on a typical day. Therefore, the proposed project would result in approximately 5,837 more pounds per day, or 2.9 tons per day, of solid waste than is generated by existing uses and employment at the project site. The Recology Hay Road Landfill has a maximum permitted throughput of 2,400 tons per day, a remaining capacity of approximately 30.4 million cubic yards, and an expected closure date of 2077.[171] The estimated 2.9 additional tons per day of solid waste generated by the proposed project would be less than 1 percent of the maximum tons per day that could be received at the landfill. Given the city's progress to date on diversion and waste reduction, and given the existing future long-term capacity available at the Recology Hay Road Landfill and other area landfills, the proposed project would be served by regional landfills with sufficient permitted capacity to accommodate its solid waste disposal needs.

***Conclusion***

The project would comply with applicable solid waste statutes and regulations, including the San Francisco Green Building Code, the 2019 CALGreen Code, the Construction and Demolition Debris Recovery Ordinance (San Francisco Ordinance No. 27-06), and the Mandatory Recycling and Composting Ordinance (San Francisco Ordinance No. 100-09). In addition, the proposed project would not generate solid waste in excess of state or local standards or in excess of capacity of local infrastructure. Sufficient landfill capacity would be available to accommodate solid-waste disposal needs for the proposed project. Therefore, impacts related to sufficient landfill capacity and compliance with applicable statutes and regulations related to solid waste would be less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

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168 California Building Standards Commission, California Green Building Standards Code (CALGreen), 2019, *https://calgreenenergyservices.com/wp/wp-content/uploads/2019_california_green_code.pdf*, accessed August 14, 2020.

169 San Francisco's Department of Environment, San Francisco Mandatory Recycling and Composting Ordinance, 2017, *https://sfenvironment.org/sites/default/files/fliers/files/sfe_zw_mandatory_factsheet.pdf*, accessed January 22, 2019.

170 The California Department of Resources Recycling and Recovery measures jurisdictional diversion and disposal rates in terms of per-capita disposal expressed as pounds per day per employee. The per capita disposal measurement system uses an actual disposal measurement based on population, disposal rates reported by disposal facilities, and program implementation efforts.

171 California Department of Resources Recycling and Recovery, Recology Hayward Landfill (48-AA-0002), 2019, *https://www2.calrecycle.ca.gov/swfacilities/directory/48-AA-0002*, accessed January 21, 2019.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, employment, operations, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would not create significant additional solid waste generation compared to the proposed project and would comply with applicable waste management and reduction statutes and regulations related to solid waste. Therefore, impacts related to sufficient landfill capacity and compliance with applicable statutes and regulations related to solid waste would be less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**Impact C-UT-1 The proposed project or variant, in combination with cumulative projects, would result in less-than-significant cumulative impacts on utilities and service systems. (Less than Significant)**

**PROPOSED PROJECT**

Future development in San Francisco would increase demand for utilities, including wastewater and stormwater treatment and disposal, water supply, and solid waste disposal. In terms of cumulative impacts, appropriate service providers are responsible for ensuring adequate provision of utilities within their service boundaries. Wastewater, stormwater, and water services would be provided by the SFPUC, and solid waste collection and disposal services would be provided by Recology. The following discussion analyzes the cumulative impacts on these service providers from implementation of the proposed project and cumulative projects in their respective service areas.

***Wastewater and Stormwater***

The Southeast Treatment Plant provides wastewater and stormwater treatment and management for the eastern portion of the city, including the project site. As part of the SSIP, the Southeast Treatment Plant is undergoing operational improvements and seismic upgrades to ensure the reliability of the sewer system.[172]

As with the proposed project, cumulative projects served by the Southeast Treatment Plant would be required to comply with all San Francisco regulations regarding wastewater and stormwater generation. Although each cumulative project would result in increased wastewater flows, most would be required to incorporate the SFPUC's Stormwater Management Requirements and Design Guidelines. Compliance, or modified compliance, with these guidelines would ensure that stormwater generated by the proposed project as well as the cumulative projects is managed onsite so that the cumulative projects in the eastern portion of the city would not substantially contribute additional volumes of polluted runoff to the city's existing combined stormwater and wastewater infrastructure. As a result, the proposed project combined with cumulative projects would not result in a cumulative impact related to the need for new sewer systems or expansion of the existing sewer system due to cumulative wastewater and stormwater flows. Therefore, the proposed project, in combination with cumulative projects, would have a less-than-significant cumulative impact on the combined sewer collection and treatment system, and no mitigation measures would be required. This topic will not be addressed in the EIR.

[172] SFPUC, San Francisco's Wastewater Treatment Facilities, June 2014, *http://sfwater.org/modules/showdocument.aspx?documentid=5799*, accessed January 23, 2019.

### *Water Supply*

As described above in Impact UT-3, the SFPUC approved and adopted a water supply assessment for the proposed project. The water supply assessment is a cumulative analysis of the project's water supply demand within the context of the city's overall cumulative water demand through 2040, based on current water supply planning. The SFPUC's approval of the water supply assessment for the proposed project indicates that the proposed project would not make a considerable contribution to a cumulative impact on water supply, the impact would be less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

### *Solid Waste*

Although the cumulative development projects, in combination with the proposed project, would incrementally increase total waste generation from the city, it is anticipated that the increasing rate of diversion citywide through recycling, composting, and other methods would result in a decreasing share of total waste requiring landfill disposal. Cumulative development throughout the city would be subject to the same recycling and composting requirements, and the same construction demolition and debris ordinances that are applicable to the proposed project.

As discussed in Impact UT-5, the Recology Hay Road Landfill has a maximum permitted throughput of 2,400 tons per day, a remaining capacity of approximately 30.4 million cubic yards, and an expected closure date of 2077.[173] The Recology Hay Road Landfill has sufficient landfill capacity to accommodate solid-waste disposal needs for the proposed project and cumulative projects.

Given the city's progress to date on diversion and waste reduction and given the future long-term capacity available at the Recology Hay Road Landfill, the proposed project, in combination with cumulative projects, would have less-than-significant cumulative impacts related to solid waste, and no mitigation measures would be required. This topic will not be addressed in the EIR.

## EXPANDED STREETSCAPE VARIANT

The expanded streetscape variant comprises the same land uses, employment, operations, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would have utilities and service system impacts similar to those of the proposed project. The expanded streetscape variant, in combination with cumulative projects, would have less-than-significant cumulative impacts related to stormwater, wastewater, water supply, and solid waste, and no mitigation measures would be required. This topic will not be addressed in the EIR.

[173] California Department of Resources Recycling and Recovery, Recology Hayward Landfill (48-AA-0002), 2019, *https://www2.calrecycle.ca.gov/swfacilities/directory/48-AA-0002*, accessed January 21, 2019.

## E.13. Public Services

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

**Impact PS-1** **The proposed project or variant would not result in an increase in demand for police protection, fire protection, schools, or other services to an extent that would require new or physically altered fire, police, school, or other public facilities, the construction of which could result in significant environmental impacts. (Less than Significant)**

**PROPOSED PROJECT**

***Fire Protection***

The San Francisco Fire Department (fire department) provides fire protection and emergency medical services in San Francisco, including the project site. The fire department consists of 45 active fire stations serving approximately 1.5 million people within San Francisco's 49 square miles. The fire department provides fire suppression and unified emergency medical services, including basic life support and advanced life support services. The closest fire station is Station 9 at 2245 Jerrold Avenue, approximately 0.3 mile northwest of the project site.

The fire department responds to non-life-threatening fire and medical emergencies (code 2) as well as life-threatening fire and medical emergencies (code 3). Response times are measured from the time a unit is dispatched to the time the unit arrives at the scene. According to San Francisco's Emergency Medical Services Agency policy, the target response time for a life-threatening emergency medical incident is within 10 minutes 90 percent of the time. In fiscal year 2018–2019, there were 63,318 code 2 incidents and 86,603 code 3 incidents. Ambulances arrived on scene in response to code 3 calls within 10 minutes 91.4 percent of the time; ambulances arrived on scene in response to code 2 calls within 20 minutes 93.5 percent of the time during the fiscal year.[174] Therefore, in fiscal year 2018–2019, the fire department met its target response time for life-threatening fire and medical emergencies.

[174] City and County of San Francisco, *San Francisco Annual Performance Results for Fiscal Year 2018–19*, *https://sfcontroller.org/sites/default/files/Documents/Auditing/FY19%20Annual%20Performance%20Report%202019-12-10.pdf*, accessed August 14, 2020.

Construction

Construction activities would occur over 31 months. During this time, approximately 400 to 500 workers would be onsite daily; staffing levels would vary throughout the construction duration in accordance with seasons and onsite construction activities. Construction activities have the potential to result in accidental onsite fires from such sources as mechanical equipment and the use of flammable construction materials. However, the proposed project would comply with Occupational Safety and Health Administration and fire and building code requirements; and construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities. Additionally, fire suppression equipment (e.g., fire extinguishers) would be maintained onsite throughout the construction duration. Furthermore, construction would comply with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste (refer to Section E.17, Hazards and Hazardous Materials). Therefore, the likelihood of accidents involving construction personnel and equipment and the need for fire department aid would be reduced and would not increase the demand for fire suppression or emergency response during the temporary construction period; new or altered fire stations would not be necessary to maintain response times.

During construction of the proposed project, road or sidewalk detours may occur but would not require new governmental facilities to be built. Because the project would adhere to applicable federal, state, and local requirements for onsite health and safety and emergency response, the impact of the proposed project on fire protection services that could result in physical environmental effects would be less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

Operation

The proposed project would increase the demand for fire protection and emergency medical services, due to the increase in the number of employees in the area. There would be a net increase of approximately 1,242 employees onsite on a typical day. Although the proposed project would likely increase the number of calls received from the area, the increase in responsibilities would not result in the need for the construction of new or altered fire stations that could then result in physical environmental impacts. According to the fire department, existing stations around the project site would provide adequate fire protection.[175] In the case of a larger event, other stations in addition to Station 9 could be called upon for support.[176] Furthermore, the proposed project would be required to comply with applicable building and fire code requirements, including the California Fire Code, which establishes requirements for fire protection systems, such as providing state-mandated fire alarms, fire extinguishers, appropriate building access and egress, and emergency response notification systems. The project sponsor would also comply with the requirements pertaining to the water volume and pressure needed for fire suppression onsite. Compliance with all applicable building and fire codes would further reduce the demand for fire department service and oversight.

[175] Velo, Jose, Deputy Chief of Administration, San Francisco Fire Department, email correspondence between Jose Velo and Stephanie Osby (AECOM), August 23, 2019.

[176] Velo, Jose, Deputy Chief of Administration, San Francisco Fire Department, email correspondence between Jose Velo and Stephanie Osby (AECOM), August 23, 2019.

For these reasons, the impact of the proposed project on fire protection services that could result in physical environmental impacts would be less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

***Police Protection***

The San Francisco Police Department (police department) provides police protection services to the project site. There are 10 district stations; the project site is in the Bayview Station jurisdiction.[177] During 2014, the Department averaged 1,691 total full-duty sworn officers.[178] In 2015, the board of supervisors passed resolution number 248-15, which increased the mandated minimum staffing level to 2,200 sworn officers.[179] As of March 2020, the police department had approximately 2,167 full-time sworn officers on duty.[180]

The police department does not have a standard for the ratio of officers to the population; rather, it bases its staffing levels on the number of service calls and crime incidents. The police department's annual statistics for 2017 demonstrate a 3.4 percent decrease in homicides and a 5 percent decrease in homicides by firearm compared to the previous year. In the same report, nonfatal shooting incidents were reported to have decreased by 15.8 percent; however, property crimes in San Francisco increased. Additionally, automobile thefts in San Francisco increased by 24 percent compared to the previous year.[181]

Construction

The proposed project could result in a small increase in demand for police protection services. Construction sites can attract theft and vandalism if not properly secured.[182] Security measures such as security fencing, lighting, and locked entry could be used to prevent theft and vandalism. Although the proposed project could increase the number of calls received from the area, the increase in responsibilities would not be substantial in light of the existing demand for police protection services. Construction of the proposed project would be temporary, for a 31-month construction period, and would not require new or physically altered police facilities that could cause significant environmental impacts. Hence, the proposed project would have a less-than-significant impact related to the provision of police services, and no mitigation measures would be required. This topic will not be addressed in the EIR.

Operation

Project operation would result in an increase of police services due to an increase of employees onsite per day. The project site would be occupied by an average of up to 1,980 employees per day, which is a net increase of approximately 1,242 employees compared to existing conditions. Typical police protection services such as responses to reported crimes, traffic enforcement, and trespassing/vandalism prevention would be required, similar to other PDR uses. Although the site would be used more intensively, which typically is associated with a greater number of calls for service, the increase in employees, lighting, street

177 San Francisco Police Department, City and County of San Francisco Streets and Police Districts 2015, prepared by San Francisco Police Department's Crime Analysis Unit, July 9, 2015.

178 San Francisco Police Department, San Francisco Police Department 2014 Annual Report. *https://www.dropbox.com/s/mpfjb7eoy54vsrb/2014%20Annual%20Report.pdf?dl=0*, accessed December 12, 2018.

179 San Francisco Board of Supervisors, Resolution No. 248-15, Establishing a Population-Based Police Staffing Policy, June 23, 2015, *http://sfbos.org/ftp/uploadedfiles/bdsupvrs/resolutions15/r0248-15.pdf*, accessed December 12, 2018.

180 Commission on Peace Officer Standards and Training, Current Employed Full-Time Sworn, Reserve & Dispatcher Personnel All Post Participating Agencies, *https://post.ca.gov/Portals/0/post_docs/hiring/le-employment-stats.pdf*, accessed May 1, 2020.

181 City and County of San Francisco, City Performance Scorecards, Violent Crime Rate and Property Crime Rate, *https://sfgov.org/scorecards/public-safety/violent-crime-rate-and-property-crime-rate*, accessed December 12, 2018.

182 Berg, Robert, and Jimme Hinze. Theft and Vandalism on Construction Sites, Journal of Construction Engineering and Management, Vol. 131, Issue 7, July 2005.

improvements, and hours of operation can serve to deter crime in the area because of the increased informal surveillance. The Bayview District would be able to provide the necessary police services and crime prevention in the area. Operation of the proposed project would not require the construction of new or physically altered police facilities that could result in a physical environmental impact in order to maintain acceptable service ratios, response times, or other performance objectives for police services. Therefore, the proposed project would have a less-than-significant impact related to the provision of police services, and no mitigation measures would be required. This topic will not be addressed in the EIR.

***Schools***

The San Francisco Unified School District provides public primary and secondary education throughout the city. The proposed project would not involve the construction of residential units that would in and of itself generate new students. The approximately 1,242 additional employees at the project site are likely to be residents of San Francisco or the Bay Area. Therefore, it is expected that the majority of school-aged children associated with new employees would be part of the existing enrollment at the San Francisco Unified School District or other school districts. Any new enrollment of school-aged children is expected to be small, and the San Francisco Unified School District would be able to accommodate these additional students. The school district manages enrollment at its schools on a district-wide basis so students can be assigned to schools with available capacity.[183] Therefore, the proposed project would have a less-than-significant impact on school capacity and would not require new or altered school facilities the construction of which could result in physical environmental impacts. No mitigation measures would be required. This topic will not be addressed in the EIR.

***Other Government Services***

The proposed project is not expected to result in a change in demand for government services, including libraries, post offices, and other public facilities. These are community facilities that people typically visit near their residences, rather than where they work. No such government services exist in the immediate project vicinity; the distance from the project site to the nearest public library (Bayview Linda Brooks-Burton Branch Library) is approximately 1 mile, to the nearest post office is approximately 0.6 mile, and to the nearest community facilities (Southeast Community Facility and Bayview Hunter's Point YMCA) is between 0.5 mile and 1.1 miles. Given the distance of these services from the project site and because the number of employees who might use these services is expected to be small, the project would not create a demand for government services that would result in the need to construct or alter existing facilities that could result in physical environmental impacts. Therefore, the proposed project would have a less-than-significant impact on other government services, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, employment, operations, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. Therefore, the expanded streetscape variant would have the same public services impacts as the proposed project and would not result in an increase in demand for police protection, fire protection, schools, or other services to an extent that would require new or physically

[183] San Francisco Public School District, Enrollment Guide 2019-2020, *http://www.sfusd.edu/en/assets/sfusd-staff/enroll/files/2019-20/2019-20_enrollment_guide_ENG_FINAL_web.pdf*, accessed August 20, 2019.

altered fire, police, school, or other public facilities, the construction of which could result in significant environmental impacts. This impact would be less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**Impact C-PS The proposed project or variant would have a less-than-significant cumulative impact on public services. (Less Than Significant)**

**PROPOSED PROJECT**

The geographic context for cumulative fire, police, and library impacts are the police, fire, and library service areas, and the geographic context for cumulative school impacts is the school district. Cumulative projects in the service areas for each of these public services, in combination with the proposed project, would increase the number of employees and residents in the area, leading to an increase in demand for public services, including fire and police protection. These essential city service providers continually assess demand, based on anticipated growth and service needs. By analyzing the applicable metrics, these agencies and services are able to adjust staffing, capacity, response times, and other measures of performance. As a result, the cumulative projects would not result in any service gap in fire, police, schools, library, or other governmental services. Therefore, the proposed project, in combination with cumulative projects, would have less-than-significant cumulative public services impacts, and no mitigation measures are required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, employment, operations, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. Similar to the proposed project, cumulative projects in the service areas for each of the public services above, in combination with the expanded streetscape variant, would increase the number of employees and residents in the area, leading to an increase in demand for public services, including fire and police protection. These essential city service providers continually assess demand, based on anticipated growth and service needs. Therefore, the expanded streetscape variant, in combination with cumulative projects, would have less-than-significant cumulative public services impacts, and no mitigation measures are required. This topic will not be addressed in the EIR.

## E.14. Biological Resources

| Topics: | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project or variant: | | | | | |
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | ☐ | ☐ | ☒ | ☐ | ☐ |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | ☐ | ☐ | ☐ | ☐ | ☒ |
| c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | ☐ | ☐ | ☐ | ☐ | ☒ |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | ☐ | ☐ | ☒ | ☐ | ☐ |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | ☐ | ☐ | ☐ | ☒ | ☐ |
| f) Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan? | ☐ | ☐ | ☐ | ☐ | ☒ |

The project site is in a developed urban area completely covered by impervious surfaces, with no natural land cover. The project site does not support riparian habitat or other sensitive natural communities,[184] as defined by the California Department of Fish and Wildlife and the United States Fish and Wildlife Service. The project site boundary is approximately 0.5 mile from the nearest water body,[185] the Islais Creek Channel, a classified estuarine system that connects to San Francisco Bay. Because it would be physically separated from riparian and aquatic communities in the bay by surrounding urban development, the proposed project and expanded streetscape variant would not involve any changes to riparian habitat or other sensitive natural communities. Therefore, topic 14 (b) is not applicable to the proposed project or expanded streetscape variant. In addition,

[184] California Department of Fish and Wildlife, Natural Communities List, 2018, *https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153398&inline*, accessed December 19, 2018.

[185] U.S. Fish and Wildlife Service, National Wetlands Inventory, 2018, updated June 25, 2018, *https://www.fws.gov/wetlands/Data/Mapper.html*, accessed December 19, 2018.

the project site and vicinity does not contain wetlands,[186] as defined by section 404 of the Clean Water Act; therefore, topic 14 (c) is not applicable to the proposed project or expanded streetscape variant. The project site is not within the jurisdiction of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan; therefore, topic 14 (f) is not applicable to the proposed project or expanded streetscape variant.

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

**PROPOSED PROJECT**

Wildlife species are protected under the federal Endangered Species Act, the Migratory Bird Treaty Act, the California Endangered Species Act, and regulations concerning California Species of Special Concern. Qualified biologists reviewed the California Natural Diversity Database,[187] California Native Plant Society,[188] and United States Fish and Wildlife Service Information for Planning and Conservation[189] occurrences of special-status plant and wildlife species in the city, focusing on occurrences within 2 miles of the project site. The likelihood of special-status species to occur in the vicinity of the project site is based on known species occurrences and natural history parameters, including the species' range, habitat, foraging needs, migration routes, and reproductive requirements.

Nesting birds, their nests, and their eggs are fully protected by California Fish and Game Code, sections 3503 and 3503.5, and the federal Migratory Bird Treaty Act. The lack of natural nesting habitats in urban areas tends to result in resident and migratory birds nesting in ornamental and/or street trees[190] and on structures. Because of existing development on the project site, the lack of natural habitat in the project site, and existing development between the project site and the nearest natural habitat, no candidate, sensitive, or special-status plant or wildlife species are anticipated to occur on the site. The nearest natural habitats are the Islais Creek Channel, approximately 0.5 mile from the project site; and Heron's Head Park, approximately 1.3 miles east of the project site.

Although the project site does not contain any natural habitat, some avian species may use buildings for nesting habitat. American Peregrine falcon (*Falco peregrine anatum)* is a Fully Protected species under the California Fish and Game Code, section 3511, that is found in urban areas and may use tall buildings and bridges for resting and breeding sites. There are two documented occurrences of American peregrine falcon within 2 miles of the project site.[191] Although suitable nesting habitat (i.e., tall buildings) is present near the project site, nesting is unlikely because the project site does not contain suitable nesting habitat and is

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186 U.S. Fish and Wildlife Service, National Wetland Inventory, 2018, updated June 25, 2018, *https://www.fws.gov/wetlands/*, accessed January 18, 2018.

187 California Department of Fish and Wildlife, CNDDB RareFind records search of San Francisco North U.S. Geological Survey 7.5-minute quadrangles, RareFind Version 5, 2018, *https://www.wildlife.ca.gov/Data/CNDDB/Maps-and-Data*, accessed December 19, 2018.

188 California Native Plant Society, Online Inventory of Rare and Endangered Plants of California, 2018, *http://cnps.site.aplus.net/cgi-bin/inv/inventory.cgi/Html?item=checkbox_9.htm*, accessed December 19, 2018.

189 U.S. Fish and Wildlife Service, List of Endangered and Threatened Species that May Occur in the Proposed Project Location and/or May Be Affected by the Proposed Project, 2018, *https://ecos.fws.gov/ipac/*, accessed December 19, 2018.

190 Public Works Code article 16, Urban Forestry Ordinance, section 802, defines a street tree as any tree growing in the public right-of-way, including unimproved public streets and sidewalks, and any tree growing on land under the jurisdiction of Public Works.

191 California Department of Fish and Wildlife, CNDDB RareFind records search of San Francisco North U.S. Geological Survey 7.5-minute quadrangles, RareFind Version 5, 2018, *https://www.wildlife.ca.gov/Data/CNDDB/Maps-and-Data*, accessed December 19, 2018.

surrounded by urban development. This species prefers more remote areas with multiple foraging habitats. Foraging habitat (open air space) for avian prey is approximately 1.3 miles east of the project site at Heron's Head Park. Due to the distance from the project site, foraging habitat at Heron's Head Park would not be affected by project construction activities. The immediate project vicinity is currently noisy, with noise from traffic on I-280 and from residential and industrial activities. Therefore, potential impacts of the proposed project on the American peregrine falcon would be less than significant.

The project site does not contain any trees, having instead only a small amount of ornamental, nonnative vegetation and no open space. Structures on the project site could, however, support a variety of other non-tree nesting resident and migratory birds, including cliff swallow (*Petrochelidon pyrrhonota*), black phoebe (*Sayornis nigricans*), and house finch (*Haemorhous mexicanus*). Native bird species are protected by both state (California Fish and Game Code, sections 3503 and 3513) and federal (Migratory Bird Treaty Act of 1918) laws. Given the high noise levels at the project site, though, it is unlikely that resident and migratory birds would use the existing structures for nesting, if project construction occurs during the nesting season (January 15 through August 15). Even if present, these bird species would be protected, because removal of existing structures and other construction activities would be required to comply with the California Fish and Game Code and federal Migratory Bird Treaty Act. These laws protect species from the destruction of active nests. Therefore, impacts of construction activities on resident and migratory birds would be less than significant. No mitigation is required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, building heights massing, and design, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would have the same biological habitat impacts as the proposed project, but would include a slightly larger footprint. Within the expanded footprint, additional ground disturbance would occur where the streetscape improvements would be completed and additional street trees would be planted; such disturbances would extend approximately 3 feet below the ground surface. These additional modifications to the streetscape would not introduce new structures or alter natural habitat that could adversely affect nesting resident and migratory birds. Therefore, the expanded streetscape variant would have a less-than-significant impact on sensitive biological species or their habitats, and no mitigation measures would be required. This topic will not be addressed in the EIR.

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

**PROPOSED PROJECT**

The project site and surrounding area are covered entirely with impervious surfaces (buildings and pavement) and do not include riparian habitat or other sensitive natural communities as defined by the California Department of Fish and Wildlife and the United States Fish and Wildlife Service. The project site does not contain wildlife nursery sites, fish habitat, or urban bird refuges and lacks natural features associated with wildlife corridors.

The project site is, however, within the Pacific Flyway, a north/south-oriented path stretching from Alaska to Patagonia, along which many species of birds migrate as they travel between breeding and overwintering locations. Glass windows are often not readily obvious to birds because of visually disorienting lights; bird strikes against such windows contribute substantially to avian mortality in urban areas, estimated to

account for as much as 1 to 5 percent of all bird deaths annually.[192] Bird strikes are exacerbated by artificial nocturnal lighting emanating from large buildings, a particular danger for nocturnal migrants and migrating songbirds.[193] The city has adopted guidelines to address this issue and has provided regulations for bird-safe design in planning code section 139, Standards for Bird-Safe Buildings, which establishes building design standards to reduce avian mortality rates associated with bird strikes.[194] The project site is not in or within 300 feet of an urban bird refuge, so the standards concerning location-related hazards are not applicable to the proposed project.[195] Although not in or near an urban bird refuge, the project is required to comply with the hazard-related standards for buildings in section 139. Therefore, with implementation of the regulations to address hazard-related building features as described in planning code section 139, the impact of the proposed project related to interference with the movement of migratory birds would be less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, building heights, massing, design, lighting, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would have same impacts on birds as the proposed project, but would include a slightly larger footprint. Within the expanded footprint, additional ground disturbance would occur where the streetscape improvements would be completed and additional street trees would be planted; such disturbances would extend approximately 3 feet below the ground surface. These additional modifications to the streetscape would not introduce new structures or light or glare sources that could adversely affect migratory birds. Therefore, the expanded streetscape variant would have a less-than-significant impact on wildlife migration, and no mitigation measures would be required. This topic will not be addressed in the EIR.

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

**PROPOSED PROJECT**

The city's Urban Forestry Ordinance (Public Works Code section 801 et seq.) requires a permit from the San Francisco Public Works to remove any protected trees. Protected trees include landmark trees,[196] significant trees,[197] or street trees on private or public property anywhere within city limits. There are no existing trees along Rankin Street, Kirkwood Avenue, Toland Street, and McKinnon Avenue bordering the project site. Because there are no existing trees onsite, the proposed project would not remove any trees that would be protected by the Urban Forestry Ordinance.

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192 San Francisco Planning Department, Standards for Bird-Safe Buildings, adopted July 14, 2011, *http://sf-planning.org/standards-bird-safe-buildings*, accessed August 26, 2019.

193 Ogden, L.E., Collision Course: The Hazards of Lighted Structures and Windows to Migrating Birds, Special Report for the World Wildlife Fund and the Fatal Light Awareness Program, September 1996, *http://default.sfplanning.org/publications_reports/bird_safe_bldgs/Ogden_Collision_Course_Lighted_structures-1996.pdf*, accessed August 26, 2019.

194 San Francisco Planning Department, Standards for Bird-Safe Buildings, adopted July 14, 2011, *http://sf-planning.org/standards-bird-safe-buildings*, accessed August 26, 2019.

195 San Francisco Planning Department, Urban Bird Refuge Data Viewer, 2011, *https://data.sfgov.org/Energy-and-Environment/Urban-Bird-Refuge/v8rh-bhzp/data*, accessed December 19, 2018.

196 Landmark trees are designated by the board of supervisors for their environmental, cultural, historical, botanical, or other importance. The landmarking process requires extensive assessment by the Urban Forestry Council, based on a set of specific criteria. These trees can be on public or private land.

197 Significant trees are trees of any species within 10 feet of the public right-of-way that are 12 inches in diameter, have a canopy spread of 15 feet, or are 20 feet tall.

Public Works Code section 806(d)(2) requires that one 24-inch box tree be planted for every 20 feet of property frontage along each street, with any remaining fraction of 10 feet or more of frontage requiring an additional tree. Public Works Code section 806(d)(4) includes a provision that the director of public works may waive street tree requirements under extenuating circumstances. However, for each required street tree the public works director waives, the project sponsor must pay an in-lieu fee to fulfill all or a portion of the street tree requirement or provide alternative landscaping comparable to or greater than the number of street trees waived. The proposed project would be required to comply with the applicable San Francisco Public Works code for street tree planting. Therefore, the proposed project would have no impact regarding conflicts with local policies or ordinances protecting trees, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, building heights, massing, design, lighting, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would include a slightly larger footprint, which would involve planting approximately 108 additional street trees in accordance with the applicable San Francisco Public Works code for street tree planting. With compliance with these regulations, the expanded streetscape variant, similar to the proposed project, would have no impact regarding conflicts with local policies or ordinances protecting trees, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**Impact C-BI-1 The proposed project or variant in combination with cumulative projects would not result in cumulative impacts to biological resources. (Less than Significant)**

**PROPOSED PROJECT**

The project site and the surrounding area do not contain habitat that supports any candidate, sensitive, or special-status species; does not include riparian habitat or other sensitive natural communities as defined by the California Department of Fish and Wildlife and United States Fish and Wildlife Service; does not contain any wetlands as defined by section 404 of the Clean Water Act; and does not fall within any local, regional, or state habitat conservation plans. Therefore, the project would not have the potential to contribute to cumulative impacts on these biological resources and conservation plans. Additionally, the proposed project would have no impact related to conflicts with local policies or ordinances protecting biological resources, such as the Urban Forestry Ordinance; therefore, the proposed project would not have the potential to combine with impacts of cumulative projects to result in a significant impact related to this topic.

Cumulative projects within 0.25 mile of the project site are discussed above under Section B, Cumulative Setting (pp. 43 through 46). The cumulative projects contain onsite or street trees and structures that could provide habitat for birds protected under California Fish and Game Code sections 3503 and 3513 and the Migratory Bird Treaty Act. Like the proposed project, the cumulative projects would be subject to compliance with the California Fish and Game Code sections 3503 and 3513 and Migratory Bird Treaty Act. In addition, the cumulative projects that would include the construction of new buildings, or building additions that could create a bird-strike hazard. These projects would be subject to the requirements of planning code section 139, Standards for Bird-Safe Buildings. Collectively, these requirements would ensure that cumulative impacts on resident and migratory birds would be less than significant. No mitigation measures are required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, building heights, massing, design, lighting, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The larger footprint encompasses paved areas with no natural habitat or existing street trees. Therefore, the proposed expanded streetscape variant would have the same biological impacts as the proposed project. For the same reasons cited for the proposed project, the expanded streetscape variant, in combination with cumulative projects, would have less-than-significant cumulative biological impacts, and no mitigation measures are required. This topic will not be addressed in the EIR.

## E.15. Geology and Soils

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

The proposed project and expanded streetscape variant would connect to the combined municipal sewer system, which is the conveyance system for wastewater in San Francisco, and would not use septic tanks or alternative wastewater disposal systems. Therefore, topic 15 (e) is not applicable to the proposed project or expanded streetscape variant.

There are no unique geologic features at the project site. Therefore, this portion of topic 15(f) is not applicable to the proposed project or expanded streetscape variant.

The information in this section is based on the 2015 Preliminary Geotechnical Investigation prepared for the proposed project.[198] The scope of the geotechnical investigation included reviewing and analyzing the subsurface conditions regarding soil and groundwater at the project site. The preliminary geotechnical investigation's conclusions and recommendations are based on available geotechnical data from the surrounding area and on limited field investigations, which included four cone penetration tests on the project site to maximum depths of 35 to 60 feet below ground surface.

## Environmental Setting

### SEISMICITY AND SOILS

The project site is relatively flat, with elevations ranging from approximately 15 to 18 feet above sea level. As detailed in the geotechnical investigation, the project site is at the northern end of the bay peninsula. Locally, the site is mapped as being covered with artificial fill overlaying tidal flat alluvial material. The Islais Creek channel, which has been in-filled, previously ran through the middle portion of the site. Estimated depth to bedrock, based on available maps, is likely between 100 and 200 feet below sea level.

Below the surface pavements, the preliminary geotechnical investigation cone penetration tests at the northwestern end of the site generally encountered loose to very dense sands with variable amounts of silt and clay down to a depth of approximately 20.5 to 15 feet below existing grades. Cornerstone Earth Group (Cornerstone) determined that these sandy soils may be fill. These sands were underlain by primarily medium stiff to stiff clays with variable amounts of silt and sands down to approximately 44 feet to 53 feet. Some thin, interbedded sand layers were encountered in the clays. The cone penetration tests at the southeastern end of the site generally encountered loose to very dense sands with variable amounts of silt and clay down to a depth of approximately 14.5 to 12 feet below existing grades. Cornerstone determined that the sandy soils may be fill. Below the sands, primarily medium stiff to stiff clays were encountered to a depth of approximately 24 to 17 feet. The clays were underlain by medium dense to very dense sands with variable amounts of silt and clay down to a depth of approximately 40 to 34.5 feet.

Groundwater was inferred by cone penetration test measurements at depths of approximately 3 to 6 feet below existing grades. Historic high groundwater level is mapped at a depth of less than 10 feet below current grades, and the Cornerstone used a design groundwater depth of 3 feet for the preliminary liquefaction evaluation. The site is in a state-designated liquefaction hazard zone.

The proposed project would involve excavation of approximately 140,600 cubic yards of soil. The proposed project's foundation design would involve concrete spread footings and/or grade beams set on improved and engineered soil, with excavation for the foundations likely to extend 10 feet below existing grade. Typical foundation excavation is expected to extend to 7 feet below grade, with elevator pits and utility trenching extending to 10 feet below existing grade. In addition, it is anticipated that pile foundations would be necessary to support the buildings. Approximately 7,000 25-foot-deep stone columns and approximately 900 60-foot-deep auger-cast piles would be used for the entire site. Each of the auger cast piles would be extended approximately 60 feet below ground surface. Soil improvement would be necessary to support the

[198] Cornerstone Earth Group, geotechnical investigation.

buildings. Ground improvements, such as extended piles, stone columns, drill displacement columns, geopiers,[199] soil-cement mixing, or other similar methods, would provide vertical support through the existing soils to strengthen the undocumented fill that underlies the project site.

**GEOLOGIC FORMATIONS AND ASSOCIATED PALEONTOLOGICAL RESOURCES**

Paleontological resources are the fossilized evidence of past life found in the geologic record. Fossils are preserved in sedimentary rocks, which are the most abundant rock type exposed at the surface of the earth. Despite the abundance of these rocks, and the vast numbers of organisms that have lived through time, preservation of plant or animal remains as fossils can be a rare occurrence. In many cases, fossils of animals and plants occur only in limited areas and in small numbers relative to the distribution of the living organisms they represent. Fossils of vertebrates—animals with backbones—are sufficiently rare to be considered nonrenewable resources.

The project site is on the northeastern side of the San Francisco Peninsula. San Francisco is primarily underlain by Franciscan Complex bedrock, Merced Formation, Colma Formation, and surficial deposits such as dune sand and artificial fill. The surficial sedimentary deposits found in the city are primarily Holocene-age artificial fill; Holocene- and Pleistocene-age dune sand, Bay Mud, slope debris, and ravine fill; and undifferentiated Quaternary (i.e., Holocene- or Pleistocene-age) sedimentary deposits.

The project site is a former creek bank on an infilled portion of Islais Creek and its estuary, and is mapped as Holocene-age artificial fill overlaying tidal flat alluvial material.[200] The surface of the project site is completely covered with pavement and buildings. The presence of artificial fill was verified, and geologic formations beneath the artificial fill were determined, based on the results of tests performed by Cornerstone as part of the site-specific geotechnical report. Cornerstone performed four cone penetration tests at each corner of the project site to depths ranging from 35 to 53 feet below the ground surface.[201] These test results indicate that the project site is underlain by artificial fill, Bay Mud, and the Colma Formation, which are discussed in further detail below.

***Artificial Fill***

In the mid-twentieth century, fill material was imported and the project site and vicinity were reclaimed from marshland for purposes of urban development.[202] Cornerstone encountered artificial fill consisting of sandy materials with varying amounts of silt and clay immediately below the ground surface, to depths ranging from 12 to 20 feet.[203]

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199 "Geopier" is an engineering term used to refer to stiff rock columns drilled deep into the earth's surface, down to a hard, nonyielding depth. Geopiers are used to support a building foundation and reinforce the soil when the existing ground is unstable, wet, or unsuitable for building construction.

200 Bonilla, M.G., *Preliminary Geologic Map of the San Francisco South 7.5' Quadrangle and Part of the Hunters Point 7.5' Quadrangle, San Francisco Bay Area, California: A Digital Database*, U.S. Geological Survey Open-File Report 98-354. Menlo Park, California, 1998.

201 Cornerstone Earth Group, geotechnical investigation.

202 San Francisco Environmental Planning Department, Environmental Planning Preliminary Archeological Review, 2018.

203 Cornerstone Earth Group, geotechnical investigation.

### *Bay Mud*

Cornerstone encountered primarily medium stiff to stiff clays with variable amounts of silt and sands beneath the artificial fill, at depths ranging from 17 to 24 feet and 44 to 53 feet (depending on location); these deposits comprise the Bay Mud.[204] Bay Mud consists of gray, soft, saturated clay and silt with organic material and some sand, that was deposited in the marshes and on the mudflats of San Francisco Bay. Lenses of sand, silt, and organic material (peat) are present within the mud. This geologic unit has been divided into two subunits: Young Bay Mud (Holocene age) and Old Bay Mud (Pleistocene age).

### *Colma Formation*

Cornerstone encountered medium dense to very dense sands below the clay layers, at depths ranging from 34 to 40 feet and 44 to 48 feet (depending on location); these deposits comprise the Colma Formation.[205] The Pleistocene-age Colma Formation primarily consists of sandy deposits laid down between 80,000 and 120,000 years ago, during the last major interglacial period. The origins of the poorly consolidated Colma sands are unclear, but they appear to represent shallow bay-to-dune, and valley-fill debris deposits. The formation extends under San Francisco Bay and may be found as high as 500 feet above sea level.

## PALEONTOLOGICAL RESOURCES SENSITIVITY CRITERIA

The city uses a Potential Fossil Yield Classification (PFYC) system as modified from the system developed and refined by the Bureau of Land Management[206] as the basis for its paleontological potential designations. The PFYC system is a predictive resource-management tool founded on two basic facts of paleontology: that occurrences of paleontological resources are closely tied to the geologic units (i.e., formations, members, or beds) that contain them, and that the likelihood of the presence of fossils can be broadly predicted from the distribution of geologic units at or near the surface. The PFYC system is presented in Table 9.

## PALEONTOLOGICAL RESOURCES SENSITIVITY ASSESSMENT

The results of a records search at the U.C. Berkeley Museum of Paleontology (UCMP) indicate that there are no recorded vertebrate fossil localities in the project site.[207] However, a vertebra from a Pleistocene-age aquatic mammal (UCMP locality V3410) was recovered from the vicinity of the Islais Creek Channel, approximately 0.5 mile northeast of the project site, in the same geologic formations that are mapped at the project site.[208] The paleontological sensitivity of each of the rock formations at the project site is presented in Table 10.

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204 Cornerstone Earth Group, geotechnical investigation.
205 Cornerstone Earth Group, geotechnical investigation.
206 Bureau of Land Management, Potential Fossil Yield Classification System for Paleontological Resources on Public Lands, 2016, *https://www.blm.gov/policy/im-2016-124*, accessed September 22, 2020.
207 U.C. Berkeley Museum of Paleontology, Paleontological Collections Database, 2022, *https://ucmpdb.berkeley.edu/about.shtml*, accessed January 28, 2022.
208 U.C. Berkeley Museum of Paleontology, Paleontological Collections Database, 2022, *https://ucmpdb.berkeley.edu/about.shtml*, accessed January 28, 2022.

## Table 9 City of San Francisco Paleontological Sensitivity Criteria

| Paleontological Potential Designation | Assignment Criteria Guidelines | Geologic Unit Classifications for City of San Francisco |
|---|---|---|
| Class 1 = Very Low Potential | Geologic units (Precambrian Age) are not likely to contain recognizable paleontological resources. Units are igneous or metamorphic, excluding air-fall and reworked volcanic ash. | Igneous rocks (not generally encountered in San Francisco) |
| Class 2 = Low Potential | Geologic units (younger than 10,000 years before present, recent aeolian deposits) are not likely to contain paleontological resources. Fossil preservation unlikely. | Holocene-age surficial deposits and Franciscan Complex (encountered in San Francisco) |
| Class 3 = Moderate Potential | Sedimentary geologic units (Marine in origin) where fossil content varies in significance, abundance, and predictable occurrence. Scattered occurrences. | Pleistocene-age surficial deposits, Colma Formation, Merced Formation (encountered in San Francisco) |
| Class U = Unknown Potential | Geologic units that cannot receive an informed class assignment or have not been studied in detail; reports of finds are anecdotal and unverified. | Holocene- to Pleistocene-age surficial deposits (specific age not known) |
| | Little information about the actual paleontological resources of the unit or area is known. | |
| | There is no information on the age of the unit. As noted above, most units in San Francisco are identified as Class U. | |

Source: City and County of San Francisco, 2022, Paleontological Resource Assessment and Mitigation Measures.

## Table 10 Paleontological Sensitivity Assessment

| Formation Name | Known Fossil Resources | Paleontological Sensitivity |
|---|---|---|
| Artificial Fill | Artificial fill consists of materials that were excavated from another location, transported to the project site, and then graded and compacted. During the excavation and subsequent construction process, any fossils that may have been present in the original materials were likely destroyed. | Low (Class 2) |
| Young Bay Mud | Holocene-age formations, such as Young Bay Mud, contain only the remains of extant, modern taxa (if any resources are present), which are not considered "unique" paleontological resources. | Low (Class 2) |
| Old Bay Mud | Pleistocene-age sediments, some of which may be referable to Old Bay Mud, have yielded vertebrate fossils in the Bay Area.[209,210,211] Recently discovered Pleistocene vertebrate fossils near San Francisco Bay include Columbian mammoth (*Mammuthus columbi*), Harlan's ground sloth (*Paramylodon harlani*), horse (*Equus* sp.), Bison sp., and pronghorn antelope (*Capromeryx minor*), among other taxa.[212] | Moderate (Class 3) |
| Colma Formation | Identified fossils in the Colma Formation include mammoth, bison, and ground sloth remains from various locations in San Francisco. Diatoms, trees, and pollen have also been reported from the Colma Formation. A Columbian mammoth was reported at the Cliff House Beach.[213] Fossil elements from three different mammoths and a bison were reported from the Colma Formation at the southeastern base of Telegraph Hill.[214] In addition, a mammoth tooth was discovered in the Colma Formation during excavation for the Transbay Transit Center in downtown San Francisco in 2012.[215] | Moderate (Class 3) |

Sources: Hay 1927, Jefferson 1991, Maguire and Holroyd 2016, Rodda and Baghai 1993, Savage 1951, SFGate 2012, Stirton 1939, UCMP 2022

[209] Stirton, R.A., *Cenozoic Mammal Remains from the San Francisco Bay Region*, University of California Publications, Bulletin of the Department of Geological Sciences. Vol. 24, No. 13, pp. 339–41, 1939.

[210] Savage, D.E., *Late Cenozoic Vertebrates of the San Francisco Bay Region*, University of California Publications, Bulletin of the Department of Geological Sciences. Vol. 28, No. 10, pp. 215–314, 1951.

[211] Jefferson, G.T., *A Catalogue of Late Quaternary Vertebrates of California: Part Two, Mammals*, Natural History Museum of Los Angeles County. Technical Reports, No. 7. Los Angeles, California, 1991.

[212] Maguire, K.C., and P.A. Holroyd, Pleistocene Vertebrates of Silicon Valley (Santa Clara County, California), *PaleoBios* 33:1–14, 2016.

[213] Hay, O.P., *The Pleistocene of the Western Region of North America and its Vertebrated Animals*, Carnegie Institute of Washington. Publication No. 322B, 1927.

[214] Rodda, P.U., and N. Baghai, Late Pleistocene Vertebrates from Downtown San Francisco, California, *Journal of Paleontology* 67(6), pp. 1058–1063, 1993.

[215] SFGate, Mammoth Tooth Found at Transbay Dig, September 13, 2012, https://ww*w.sfgate.com/bayarea/article/Mammoth-tooth-found-at-Transbay-dig-3861381.php*.

## Regulatory Setting

The following description of existing development regulations and standards provides the regulatory framework governing seismic, geotechnical, and soil hazards.

### FEDERAL REGULATIONS TO ADDRESS SEISMIC HAZARDS

**Earthquake Hazard Reduction Act of 1977.** Federal laws codified in United States Code Title 42, chapter 86, were enacted to reduce risks to life and property from earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards reduction program. Implementation of these requirements are regulated, monitored, and enforced at the state and local levels. Key regulations and standards applicable to the proposed project are summarized in the following paragraphs.

### CALIFORNIA REGULATIONS TO ADDRESS SEISMIC HAZARDS

**The Alquist-Priolo Earthquake Fault Zoning Act of 1972 (Alquist-Priolo Act).** The Alquist-Priolo Act (Public Resources Code section 2621 et seq.) is intended to reduce the risk to life and property from surface fault rupture during earthquakes. The Alquist-Priolo Act prohibits the location and construction of most types of structures intended for human occupancy[216] overactive fault traces and strictly regulates construction in the corridors along active faults (i.e., earthquake fault zones).

**State Building Code Chapters 18 and 16.** Chapter 18, Soils and Foundations, of the state building code provides the parameters for geotechnical investigations and structural considerations in the selection, design, and installation of foundation systems to support the loads from the structure above. Section 1803 (Geotechnical Investigations) sets forth the scope of geotechnical investigations conducted. Section 1804 (Excavation, Grading, and Fill) specifies considerations for excavation, grading, and fill to protect adjacent structures and to prevent destabilization of slopes due to erosion and/or drainage. In particular, Section 1804.1 (Excavation Near Foundations) requires that adjacent foundations be protected against a reduction in lateral support as a result of project excavation. This is typically accomplished by underpinning or protecting said adjacent foundations from detrimental lateral or vertical movement, or both. Section 1807 (Foundation Walls, Retaining Walls, and Embedded Posts and Poles) specifies requirements for foundation walls, retaining walls, and embedded posts and poles to ensure stability against overturning, sliding, excessive pressure, and water lift, including seismic considerations. Sections 1808 through 1810 (Foundations) specify requirements for foundation systems based on the most unfavorable loads specified in Chapter 16, Structural, for the structure's seismic design category, in combination with the soil classification at the project site. During its review of the building permit for a project, the building department reviews project plans for conformance with the recommendations in a project-specific geotechnical report and may require additional site-specific soils report(s) through the building permit application process.

**State Seismic Hazards Mapping Act of 1990 (Landslide and Liquefaction Hazard Zones).** Pursuant to the Seismic Hazards Mapping Act of 1990 (seismic hazards act), the California State Geologist has designated seismic hazard zones for landslide and liquefaction hazards. These mapped areas enable cities and counties to adequately prepare the safety element of their general plans and to encourage land use management policies and regulations to reduce and mitigate those hazards in the interest of protecting public health and

[216] With reference to the Alquist-Priolo Act, a structure for human occupancy is defined as one "used or intended for supporting or sheltering any use or occupancy that is expected to have a human occupancy rate of more than 2,000 person-hours per year" (California Code of Regulations, Title 14, division 2, section 3601[e]).

safety.[217] Projects situated in a seismic hazard zone for liquefaction or landslide hazard are subject to the seismic hazards act requirements, which include a geotechnical investigation, performed by a qualified engineer and/or geologist, to delineate the area of hazard and to propose measures to address any identified hazards. The local building official must incorporate the recommended measures to address such hazards into the conditions of the building permit.

#### SAN FRANCISCO BUILDING CODES TO ADDRESS SEISMIC HAZARDS

**Building Department Permit Review Process.** San Francisco relies on the state and local regulatory review process for review and approval of building permits pursuant to the following:

- California Building Standards Code (California Code of Regulations, title 24)
- San Francisco Building Code (the state building code), plus local amendments (including administrative bulletins) that supplement the state code
- The building department's implementing procedures, including information sheets
- Seismic Hazards Mapping Act of 1990 (Public Resources Code sections 2690 through 2699.6)
- Administrative Bulletin No. AB-82, which provides guidelines and procedures for structural, geotechnical, and seismic hazard engineering design review[218]
- Information Sheet No. S-05, which identifies the type of work for which geotechnical reports are required, such as for new construction, building additions, and grading, and report submittal requirements[219]

**Mandatory Interdepartmental Project Review.** Projects that involve new construction of a building eight stories or more, new construction in a seismic hazard zone for liquefaction hazard, or new construction in a seismic hazard zone for landslide hazard are subject to a mandatory interdepartmental project review prior to a public hearing before the planning commission or the issuance of the new construction building permit. The interdepartmental review meeting must include representatives from the planning, building, public works, and fire departments to address compliance with applicable codes, and design and project construction considerations.[220]

**San Francisco Public Works Code.** Section 146, Construction Site Runoff Control, requires that all construction sites must implement best management practices to minimize surface runoff erosion and sedimentation. In addition, pursuant to section 146.7, if construction activities would disturb 5,000 square feet or more of ground surface, then the project sponsor must have an Erosion and Sediment Control Plan (erosion and sediment control plan) developed and submit a project application to the SFPUC prior to

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[217] In the context of the seismic hazards act, "mitigation" refers to measures that are consistent with established practice and that will reduce seismic risk to acceptable levels, rather than the mitigation measures that are identified under CEQA to reduce or avoid environmental impacts of a proposed project.

[218] San Francisco Department of Building Inspection, Administrative Bulletin No. AB-082, Guidelines and Procedures for Structural, Geotechnical, and Seismic Hazard Engineering Design Review, November 21, 2018, *https://sfdbi.org/administrative-bulletins*.

[219] San Francisco Department of Building Inspection, Information Sheet No. S-05, Geotechnical Report Requirements, May 7, 2019, *https://sfdbi.org/sites/default/files/IS%20S-05.pdf*.

[220] San Francisco Planning Department. Interdepartmental Project Review, *http://forms.sfplanning.org/ProjectReview_Application Interdepartmental.pdf.*

commencing construction-related activities. An erosion control plan is a site-specific plan that details the use, location, and emplacement of sediment and erosion control devices.

## Impact Analysis

**Impact GE-1 The proposed project or variant would not directly or indirectly cause potential adverse effects related to the rupture of a known earthquake fault, strong seismic ground shaking, and seismic-related ground failure, including liquefaction, or landslides. (Less than Significant)**

### PROPOSED PROJECT

#### *Fault Rupture*

The project area is outside the Alquist-Priolo Earthquake Fault Zone and no known active faults are present in the project area. The nearest active faults are the San Andreas Fault (6.8 miles from project site); the San Gregorio Fault (10.3 miles from site); and the Hayward Fault (11.6 miles from project site).[221] Given the distance of the project site from these faults, there is a low risk of surface rupture related to fault movement. Additionally, the geotechnical investigation stated that there is no evidence of surface expression of fault traces on the project site and concluded that the risk of fault rupture hazard is not significant.[222] Furthermore, the project would not increase the risk of fault rupture because it would not add a substantial load to any fault or introduce water, a lubricant, into a fault zone. Therefore, the potential for construction and operation of the proposed project to increase hazards related to the risk of loss, injury, or death involving fault rupture is less than significant. No mitigation measures would be required. This topic will not be addressed in the EIR.

#### *Strong Seismic Ground Shaking*

The San Francisco Bay Area is one of the most seismically active areas in the country. The U.S. Geological Survey estimates that there is a 72 percent chance of at least one magnitude 6.7 earthquake occurring in the San Francisco region within the next 30 years.[223] Given the distance of the San Andreas Fault, the San Gregorio Fault, and the Hayward Fault to the project site (approximately 7 to 12 miles), ground shaking could be experienced at the project site during moderate to severe earthquakes. Proposed structures must comply with the standards of the California Building Code Title 24, specifically chapter 16, structural design and chapter 18, soils and foundations, which set forth minimum requirements for building design and construction of public and private buildings relating to fire and life safety, structural safety, and access compliance.[224] Additionally, the proposed project would be required to comply with the San Francisco Building Codes, including administrative bulletins and the building department's implementing procedures.

Complete avoidance of any damage may not be feasible, but incorporation of industry-standard seismic design measures in accordance with current building codes would address the effects of strong seismic ground shaking. The project would not exacerbate the potential for seismic ground shaking, which is a

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221 California Department of Conservation, *Fault Activity Map of California*, 2010, *http://maps.conservation.ca.gov/cgs/fam/*, accessed December 17, 2018.

222 Cornerstone Earth Group, geotechnical investigation.

223 U.S. Geological Survey, *UCERF3: A New Earthquake Forecast for California's Complex Fault System*, 2015, *https://pubs.usgs.gov/fs/2015/3009/pdf/fs2015-3009.pdf*, accessed December 18, 2017.

224 Division of the State Architect, *Title 24 Overview*, 2018, *https://www.dgs.ca.gov/DSA/Resources/Page-Content/Resources-List-Folder/Overview-Title-24-Building-Standards-Code?search=title%2024%20overview*, accessed December 17, 2018.

function of the location of the epicenter, the size of the event, and the underlying geological formations, none of which would be affected by the proposed project. Furthermore, the building department would review the project's construction documents for conformance with recommendations in the site-specific, design-level geotechnical investigation to ensure compliance with state and local building code provisions related to structural design and safety. Therefore, construction or operation of the project would not be expected to increase strong seismic ground shaking that would result in risk of loss, injury, or death, and impacts would be less than significant. This topic will not be addressed in the EIR.

***Seismic-Related Ground Failure, Including Liquefaction***

Liquefaction is a transformation of soil from a solid to a liquefied state, during which saturated soil temporarily loses strength. This phenomenon results from the buildup of excess pore water pressure during earthquake-induced cyclic loading. Soils susceptible to liquefaction include loose to medium dense sand and gravel, low plasticity silt, and some low-plasticity clay deposits. According to the city's general plan and the state's Seismic Hazards Mapping Act of 1990, the project site is in a liquefaction hazard zone.[225],[226] The preliminary geotechnical investigation found that the project site is underlain by loose to very dense sands with variable amounts of silt and clay to a depth of approximately 12 to 20.5 feet below existing grades. Groundwater was measured at depths of about 3 to 6 feet below existing grades. The methods used to estimate liquefaction settlement assume that there is a sufficient cap of nonliquefiable material to prevent ground rupture or sand boils.[227]

The project could experience liquefaction and differential settlement if not constructed properly, and could expose people and structures to substantial adverse ground failure effects. However, in accordance with the provisions of the 2019 state building code and Special Publication 117A,[228] the preliminary geotechnical report for the proposed project provides recommendations to address these hazards, such as supporting the new buildings with shallow foundations with ground improvement measures extending 20 to 45 feet below existing grades; or supporting the new buildings with deep foundation systems, such as auger-cast or extended piles. Ground improvements would provide vertical support through the existing soils to reduce potential liquefaction impacts. Deep foundation systems would derive support from underlying stiff alluvial soils beneath the fill and underlying soft compressible clays and liquefiable soils. As described in Section A, Project Description, the proposed project would be supported on concrete spread footings and/or grade beams, on improved and engineered soil. Soil improvement would be accomplished using a combination of 7,000 25-foot-deep stone columns and 900 60-foot-deep auger-cast piles.[229] The building department permit review process ensures that the proposed project's structural and foundation plans would comply with applicable building code provisions and be in conformance with the measures recommended in the project-specific geotechnical reports and required by the building department's Administrative Bulletin AB-082.[230] Compliance with these requirements would ensure that the proposed project would not exacerbate the

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225 City and County of San Francisco, San Francisco General Plan, Community Safety Element, Map 4, *https://generalplan.sfplanning.org/Community_Safety_Element_2012.pdf*, accessed January 9, 2019.

226 California Department of Conservation, Seismic Hazards Mapping Act of 1990 GIS Data (liquefaction layer), viewer, *https://maps.conservation.ca.gov/cgs/DataViewer/*, accessed January 4, 2022.

227 Cornerstone Earth Group, geotechnical investigation.

228 California Geological Survey, Guidelines for Evaluating and Mitigating Seismic Hazards in California, 2008, *https://www.conservation.ca.gov/cgs/Documents/Program-SHP/SP_117a.pdf*, accessed January 9, 2019.

229 Since preparation of the geotechnical report, the project sponsor has advanced the project design with its engineers/project team so that this description of pile installation is more current and indicative of the project than the description in the geotechnical report.

230 City and County of San Francisco, Administrative Bulletin AB-082, Guidelines and Procedures for Structural, Geotechnical, and Seismic Hazard Engineering Design Review, 2018, *https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_building/0-0-0-95162*, accessed January 9, 2019.

potential for seismically related ground failure, including liquefaction and lateral spreading.[231] Therefore, this impact would be less than significant. This topic will not be addressed in the EIR.

### *Landslides*

The topography around the project site is flat and does not include hills or cut slopes that could be subject to landslide. According to the city's general plan and the state's Seismic Hazards Mapping Act of 1990, the site is not in a designated landslide hazard zone.[232,233] Therefore, construction and operation of the proposed project would have no impact with respect to increasing the potential for landslides. Therefore, this topic will not be addressed in the EIR.

#### EXPANDED STREETSCAPE VARIANT

The expanded streetscape variant comprises the same land uses, intensity, excavation and foundation work, and site plan as the proposed project, but would extend streetscape improvements for the entire cross section of the streets along the project perimeter to Better Streets standards. Similar to the proposed project, the expanded streetscape variant would not directly or indirectly cause potential adverse effects related to the rupture of a known earthquake fault, strong seismic ground shaking, and seismic-related ground failure, including liquefaction, or landslides. All of the applicable building codes and standards described for the proposed project would apply to the expanded streetscape variant. In addition, these streetscape improvements in the public right-of-way would be required to comply with city standards for such improvements. Compliance with city codes and standards would ensure that these hazards would not be exacerbated by the expanded streetscape variant; no mitigation measures would be required. Therefore, this topic will not be addressed in the EIR.

**Impact GE-2 Construction and operation of the proposed project or variant would not result in substantial erosion or loss of topsoil. (Less than Significant)**

#### PROPOSED PROJECT

San Francisco Public Works Code section 146, Construction Site Runoff Control, requires all construction sites to implement best management practices to minimize surface runoff erosion and sedimentation. In addition, pursuant to section 146.7 of the code, if construction activities disturb 5,000 square feet or more of ground surface, then the project sponsor must develop an erosion and sediment control plan and submit a project application to the SFPUC prior to commencing construction-related activities. An erosion control plan is a site-specific plan that details the use, location, and placement of sediment and erosion control devices.

The project site is generally flat and covered entirely with impervious surfaces. The proposed project would involve excavation of approximately 134,000 cubic yards of soil onsite to a maximum depth of approximately 10 feet below the existing grade at the site. Best management practices in the Stormwater Pollution Prevention Plan and Erosion Control Plan, pursuant to the state requirements and the city's code, respectively, would reduce potential impacts related to erosion and topsoil loss at the project site.

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231 When *lateral spreading* occurs, the ground tears, opening surface cracks and fissures across the slope.

232 City and County of San Francisco, San Francisco General Plan, Community Safety Element, Map 4, *https://generalplan.sfplanning.org/Community_Safety_Element_2012.pdf*, accessed December 18, 2019.

233 California Department of Conservation, Seismic Hazards Mapping Act of 1990 GIS Data (landslide layer), viewer, *https://maps.conservation.ca.gov/cgs/DataViewer/*, accessed January 4, 2022.

Additionally, the proposed project would not substantially change the general topography of the site because the project site is already generally flat, and there are no unique geologic or physical features at the project site.

Once constructed, the proposed project would continue to be covered entirely with impervious surfaces. As discussed in Impact UT-2, the proposed project would be required to comply with the San Francisco Stormwater Management Ordinance. This ordinance requires sites with more than 50 percent impervious surfaces (such as the project site) to be designed so that the stormwater runoff rate and volume do not exceed predevelopment conditions for the one- and two-year, 24-hour design storm.[234] As discussed in the Water Supply Assessment for this project, the project would request a modified compliance with the first submittal of the Stormwater Control Plan. The modified requirements would be a 40 percent reduction in the rate and a 10 percent reduction in the volume of runoff for the 2-year, 24-hour design storm.[235] To meet these modified requirements, the proposed project would include rainwater collection cisterns that would manage stormwater onsite and limit demand on both the collection system and wastewater facilities resulting from stormwater discharges. The requirements of the San Francisco Stormwater Management Ordinance would slow runoff from the site, further reducing erosion from existing site conditions. For these reasons, the project would not result in substantial erosion or loss of topsoil. The impact would be less than significant, and no mitigation is required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, excavation and foundation work, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would have erosion and top soil loss impacts similar to those of the proposed project, but would include a slightly larger footprint. Within the expanded footprint, additional ground disturbance would occur where the streetscape improvements would be completed; such disturbances would extend approximately 3 feet below the ground surface. All of the applicable building codes, regulations, and standards described for the proposed project would apply to the expanded streetscape variant and would ensure that construction of the expanded streetscape variant would not result in substantial erosion or loss of topsoil. The impact would be less than significant, and no mitigation is required. This topic will not be addressed in the EIR.

**Impact GE-3 The project site is not located on a geologic unit or soil that is unstable, or that could become unstable as a result of the proposed project or variant. (Less than Significant)**

**PROPOSED PROJECT**

As discussed under Impact GE-1 (landslides), the site is not in a designated landslide hazard zone. Additionally, there are no geologic units within a short distance of the project area that are considered susceptible to lateral spreading; therefore, the potential for lateral spreading to affect the site is low.[236] However, the project site is in a state-designated seismic hazard zone for liquefaction,[237] and the site is mapped as being tidal flat material overlain by artificial fill material. If not designed appropriately, construction on relatively loose materials or over materials of differing properties could be subject to

[234] SFPUC, San Francisco Stormwater Management Requirements and Design Guidelines, May 2016, *https://sfpuc.org/sites/default/files/documents/SMR_DesignGuide_May2016.pdf*, accessed January 23, 2019.
[235] SFPUC, *Water Supply Assessment for San Francisco Gateway Project*, adopted June 9, 2020, Resolution No. 20-0126.
[236] Cornerstone Earth Group, geotechnical investigation.
[237] City and County of San Francisco, *General Plan – Community Safety Element*, 2012.

subsidence or differential settlement. As described in Section A, Project Description, the proposed project's foundation is expected to be supported by 7,000 25-foot-deep stone columns and 900 60-foot-deep auger-cast piles designed to address future static or seismic settlement. The proposed project would be required to adhere to site preparation standards in accordance with the California building code requirements, which include site-specific design-level evaluation of underlying materials and their engineering characteristics. The structural engineering design construction documents would be reviewed by the building department for conformance with recommendations in the site-specific geotechnical investigation as part of the building permit review process.[238]

With implementation of industry standard engineering design measures in accordance with building code standards, the potential impacts associated with construction on unstable soils would be reduced, and hazards associated with unstable soils would not be exacerbated by the project. Therefore, the potential impact of project construction on unstable soils would be less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, excavation and foundation work, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would have geologic impacts similar to those of the proposed project but would include a slightly larger footprint. Within the expanded footprint, additional ground disturbance would occur where the streetscape improvements would be completed; such disturbances would extend approximately 3 feet below the ground surface. Similar to the proposed project, with implementation of industry standard engineering design measures in accordance with building code and public works standards, the potential impacts associated with construction on unstable soils would be reduced, and hazards associated with unstable soils would not be exacerbated by the expanded streetscape variant. Therefore, the potential impact of the expanded streetscape variant construction on unstable soils would be less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**Impact GE-4 The proposed project or variant would not create substantial direct or indirect risks to life or property as a result of being located on expansive soil. (Less than Significant)**

**PROPOSED PROJECT**

Expansive soils expand and contract in response to changes in soil moisture and are characterized by their ability to undergo significant volume change (i.e., to shrink and swell), particularly when near-surface soils fluctuate from saturated to low moisture-content conditions and back again. Expansive soils are typically very fine grained and have a high to very high percentage of clay. They can damage structures and buried utilities and increase maintenance requirements.

Underlying soils at the project site are generally loose to very dense sands with variable amounts of silt and clay, as described under Impact GE-1 (liquefaction). The site does not contain subsurface soils consisting of clays that have high expansive potential. Therefore, the project would not result in a substantial direct or indirect risk to life or property related to expansive soils. Additionally, compliance with building code

[238] Cornerstone Earth Group, geotechnical investigation.

requirements would ensure that potential impacts related to expansive soils would be less than significant. No mitigation measures would be required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, excavation and foundation work, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would have geologic impacts similar to those of the proposed project but would include a slightly larger footprint. Within the expanded footprint, additional ground disturbance would occur where the streetscape improvements would be completed; such disturbances would extend approximately 3 feet below the ground surface. Similar to the proposed project, the expanded streetscape variant would not result in a substantial direct or indirect risk to life or property related to expansive soils. Additionally, compliance with building code requirements and public works standards would ensure that potential impacts related to expansive soils would be less than significant. No mitigation measures would be required. This topic will not be addressed in the EIR.

**Impact GE-5 The proposed project or variant could directly or indirectly destroy a unique paleontological resource. (Less than Significant with Mitigation)**

**PROPOSED PROJECT**

As described above, rock formations at the project site consist of artificial fill, Bay Mud, and the Colma Formation. Because the artificial fill and Young Bay Mud are too young to contain unique paleontological resources, these formations are considered to be of low paleontological sensitivity (Class 2). Because a limited amount of unique paleontological resources in the form of vertebrate fossils have been recovered from Old Bay Mud and Colma Formation in San Francisco and the greater Bay Area region, these formations are considered to be of moderate paleontological sensitivity (Class 3). The proposed project includes construction of 25-foot-deep stone columns and installation of 60-foot-deep auger-cast piles, which would exceed 2 feet in diameter. Therefore, project-related excavation would encounter Old Bay Mud and the Colma Formation. Damage to or destruction of unique paleontological resources, which may be present in these formations, would represent a potentially significant impact.

To reduce potentially significant impacts on unique paleontological resources to a less-than-significant level, Mitigation Measure M-GE-5 would require the project sponsor to engage a qualified paleontologist to provide pre-construction worker environmental awareness training regarding potential paleontological resources and would require construction to be temporarily halted in the event of the inadvertent discovery of a paleontological resource during construction.

**Mitigation Measure M-GE-5 Inadvertent Discovery of Paleontological Resources**

**Worker Environmental Awareness Training.** Prior to commencing construction, the project sponsor shall engage a paleontologist meeting the standards of the Society of Vertebrate Paleontology[239] to conduct training for all onsite construction workers regarding paleontological resources and the

[239] Society of Vertebrate Paleontology, *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*, 2010, *https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines.pdf*, accessed January 2022.

contents of the paleontological resources alert sheet, as provided by the planning department. The paleontological resources alert sheet shall be prominently displayed at the construction site during ground-disturbing activities.

In addition, the project sponsor (through a designated representative) shall inform construction personnel of the immediate stop work procedures and contact information to be followed if bones or other potential fossils are unearthed at the project site, and the laws and regulations protecting paleontological resources. As new workers arrive at the project site for ground-disturbing activities, they shall be trained by the construction supervisor.

The paleontologist shall submit a letter confirming the timing of the worker training to the planning department. The letter shall confirm the project's location, the date of training, the location of the informational handout display, and the number of participants. The letter shall be transmitted to the planning department within five business days of conducting the training.

**Discovery of Unanticipated Paleontological Resources.** In the event of the inadvertent discovery of a paleontological resource during construction, excavations within 25 feet of the find shall temporarily be halted until the discovery is examined by a qualified paleontologist (as defined by the Society of Vertebrate Paleontology). Work in the sensitive area shall resume only when deemed appropriate by the qualified paleontologist, in consultation with the planning department.

The qualified paleontologist shall determine: 1) whether the discovery is scientifically significant; 2) the necessity for involving other agencies and stakeholders; 3) the significance of the resource; and 4) methods for resource recovery. If a paleontological resource assessment results in a determination that the resource is not scientifically important, this conclusion shall be documented in a paleontological evaluation letter to demonstrate compliance with applicable statutory requirements. The paleontological evaluation letter shall be submitted to the planning department for review within 30 days of the discovery.

If a paleontological resource is determined to be of scientific importance and there are no feasible avoidance measures, a paleontological mitigation program must be prepared by the qualified paleontologist engaged by the project sponsor. The mitigation program shall include measures to fully document and recover the resource and shall be approved by the planning department. Ground-disturbing activities in the project area shall resume and be monitored, as determined by the qualified paleontologist in

collaboration with the planning department, for the duration of such activities.

The mitigation program shall include: 1) procedures for construction monitoring at the project site; 2) fossil preparation and identification procedures; 3) curation into an appropriate repository; and 4) preparation of a paleontological resources report at the conclusion of ground-disturbing activities. The report shall include dates of field work, results of monitoring, fossil identifications to the lowest possible taxonomic level, analysis of the fossil collection, a discussion of the scientific significance of the fossil collection, conclusions, locality forms, an itemized list of specimens, and a repository receipt from the curation facility. The project sponsor shall be responsible for the preparation and implementation of the mitigation program, in addition to any costs necessary to prepare and identify collected fossils, and for any curation fees charged by the paleontological repository. The mitigation program shall be submitted to the planning department for review within 10 business days of the discovery. The paleontology report shall be submitted to the planning department for review within 30 business days from conclusion of ground-disturbing activities, or as negotiated following consultation with the planning department.

***Significance after Mitigation.*** The project sponsor has agreed to implement Mitigation Measure M-GE-5. This measure would ensure that unique paleontological resources that may be present in soils/sediments that would be disturbed by project construction would be identified and assessed. If a paleontological resource of scientific importance is present, the resource would be preserved in place or paleontological data recovery would be carried out to preserve the important information it represents. With implementation of these measures, the potentially significant impact to unique paleontological resources would be reduced to a less-than-significant level. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, excavation and foundation work, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would have paleontological impacts similar to those of the proposed project but would include a slightly larger footprint. Within the expanded footprint, additional ground disturbance would occur where the streetscape improvements would be completed; such disturbances would extend approximately 3 feet below the ground surface. Similar to the proposed project, under the expanded streetscape variant, the project sponsor would be required to implement Mitigation Measure M-GE-5: Inadvertent Discovery of Paleontological Resources. With implementation of these measures for the expanded streetscape variant footprint, the potentially significant impact to unique paleontological resources would be reduced to a less-than-significant level. This topic will not be addressed in the EIR.

**Impact C-GE-1 The proposed project or variant, in combination with cumulative projects in the project site vicinity, would have less-than-significant cumulative impacts related to geology, soils, and seismicity. (Less than Significant)**

**PROPOSED PROJECT**

Geologic, soils, and seismic impacts are generally site-specific and highly localized. Therefore, the potential for the proposed project to combine with cumulative projects and create a cumulative impact related to geology, soils, and seismicity would be low. Furthermore, with respect to geology, soils, and seismicity, all projects in the vicinity would also be subject to building department requirements for geotechnical investigation and required to comply with the state and local building codes. The building permit would be reviewed for conformance with the recommendations in the geotechnical investigation. For these reasons, the proposed project, in combination with cumulative projects, would have less-than-significant cumulative impacts related to geology, soils, and seismicity. No mitigation measures are required. This topic will not be addressed in the EIR.

In the San Francisco peninsula, Pleistocene-age surficial deposits, Old Bay Mud, Colma Formation, and the Plio-Pleistocene-age Merced Formation are of moderate paleontological sensitivity (Class 3). As described above, mitigation would reduce this impact to a less-than-significant level. Other projects considered in the cumulative analysis that involve ground-disturbing activities would not affect potential resources at this site. Therefore, the projects considered in this cumulative analysis would not result in a significant cumulative impact.

This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, excavation and foundation work and site plan as the proposed project but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. Therefore, the expanded streetscape variant would have geology and paleontology resources impacts similar to those of the proposed project but would include a slightly larger footprint. Within the expanded footprint, additional ground disturbance would occur where the streetscape improvements would be completed; such disturbances would extend approximately 3 feet below the ground surface.

Similar to the proposed project, under the expanded streetscape variant, geologic, soils, and seismic impacts are generally site-specific and highly localized. Therefore, the potential for the expanded streetscape variant to combine with cumulative projects and create a cumulative impact related to geology, soils, and seismicity would be low. Furthermore, with respect to geology, soils, and seismicity, all projects in the vicinity would also be subject to public works' requirements and building department requirements for geotechnical review and required to comply with the state and local building codes. No mitigation measures are required. This topic will not be addressed in the EIR.

Similar to the proposed project, under the expanded streetscape variant there would not be a significant cumulative impact. This topic will not be addressed in the EIR.

## E.16. Hydrology and Water Quality

| Topics: | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project or variant: | | | | | |
| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? | ☐ | ☐ | ☒ | ☐ | ☐ |
| b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? | ☐ | ☐ | ☒ | ☐ | ☐ |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would: | ☐ | ☐ | ☒ | ☐ | ☐ |
| i) Result in substantial erosion or siltation on or offsite; | ☐ | ☐ | ☒ | ☐ | ☐ |
| ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite; | ☐ | ☐ | ☒ | ☐ | ☐ |
| iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or | ☐ | ☐ | ☒ | ☐ | ☐ |
| iv) Impede or redirect flood flows? | ☐ | ☐ | ☒ | ☐ | ☐ |
| d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? | ☐ | ☐ | ☐ | ☐ | ☒ |
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | ☐ | ☐ | ☒ | ☐ | ☐ |

The project site is not in a 100-year flood hazard area designated on the city's interim floodplain map, and would not place housing or structures within a 100-year flood hazard area that would impede or redirect flood flows as shown on the Federal Emergency Management Agency's Preliminary Flood Insurance Rate Map for the southeastern quadrant of San Francisco.[240] The project site is not within a tsunami hazard zone; therefore, no significant tsunami hazards exist at the site.[241] Additionally, the site is not in a dam inundation

[240] City and County of San Francisco, San Francisco's Interim Floodplain Map, Southeast, November 12, 2015, *http://sfgsa.org/sites/default/files/Document/SF_SE.pdf*, accessed December 19, 2018.

[241] City and County of San Francisco, Community Safety Element of the San Francisco General Plan, 2012, Map 5 (Tsunami Hazard Zones San Francisco, 2012), *http://generalplan.sfplanning.org/Community_Safety_Element_2012.pdf*, accessed December 17, 2018.

zone or subject to flooding from levee failure.[242] The preliminary geotechnical report that was prepared for this project found that the potential for inundation due to seiche is considered low.[243,244] Therefore, topic E.16 (d) is not applicable to the proposed project or expanded streetscape variant.

**Impact HY-1** **The proposed project or variant would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or conflict with or obstruct implementation of a water quality control plan. (Less than Significant)**

**PROPOSED PROJECT**

***Water Quality and Wastewater Discharge***

Stormwater and wastewater from the project site are collected in the city's combined sewer system, which collects, transports, and treats sanitary sewage and stormwater runoff in the same facilities prior to discharge to the Pacific Ocean or the San Francisco Bay. During dry weather (typically May through September), the flows consist mainly of wastewater. During wet weather (generally October through April), the combined sewer system collects large volumes of stormwater runoff in addition to wastewater; Bayside wet-weather flows are defined as flows greater than 110 mgd due to rain.[245]

The city is divided into drainage basins or watersheds that drain either to the Oceanside Treatment Plant or the Southeast Treatment Plant; flows may also drain to the North Point Wet-Weather Facility during a storm.[246] The combined sewer flows from the project site are treated at the Southeast Treatment Plant, which treats 80 percent of the city's flows.[247] Discharges from the Southeast Treatment Plant are regulated by Bayside National Pollutant Discharge Elimination System (NPDES) Permit No. CA0037664 (issued by the San Francisco Regional Water Quality Control Board) and the United States Environmental Protection Agency's (U.S. EPA's) Combined Sewer Overflow Control Policy. The Southeast Treatment Plant has a wet-weather flow capacity of 250 mgd. It has the capacity to provide primary and secondary treatment to up to 150 mgd and is permitted to discharge up to an additional 100 mgd of wastewater that receives primary treatment plus disinfection. If wet-weather flows exceed the capacity of the overall system, the excess is discharged from one of the 29 near-shore combined sewer overflow discharge structures. The permit

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242 City and County of San Francisco, Community Safety Element of the San Francisco General Plan, 2012, Map 5 (Potential Inundation Areas Due to Reservoir Failure), *http://generalplan.sfplanning.org/Community_Safety_Element_2012.pdf*, accessed December 17, 2018.

243 Cornerstone Earth Group, geotechnical investigation.

244 A seiche is an oscillation of a water body, such as a bay, that may cause local flooding. A seiche could occur on San Francisco Bay due to seismic or atmospheric activity.

245 SFPUC, San Francisco Sewer System Master Plan, 2010, *https://www.sfwater.org/modules/showdocument.aspx?documentid=610*, accessed August 30, 2019.

246 SFPUC, San Francisco's Wastewater Treatment Facilities, 2014, *https://sfwater.org/modules/showdocument.aspx?documentid=5801*, accessed August 19, 2019.

247 SFPUC, San Francisco's Wastewater Treatment Facilities, 2014, *https://sfwater.org/modules/showdocument.aspx?documentid=5801*, accessed August 19, 2019.

requires wet-weather overflows from combined sewer overflow discharges to comply with the technology-based requirements of the U.S. EPA's Combined Sewer Overflow Control Policy.[248]

In addition to compliance with the applicable NPDES permit, new development projects must comply with article 4.2, section 147 of the San Francisco Public Works Code, the San Francisco Stormwater Management Ordinance, which was last updated on April 2, 2016 (No. 64-16). The intent of the San Francisco Stormwater Management Ordinance is to reduce the volume of stormwater entering the city's combined and separate sewer systems. Stormwater Management Ordinance compliance approvals for this project will be conducted by the SFPUC. The SFPUC has developed the 2016 Stormwater Management Requirements and Design Guidelines in accordance with the requirements of this ordinance. The ordinance requires sites with more than 50 percent impervious surfaces (such as the project site) to be designed so that the stormwater runoff rate and volume do not exceed predevelopment conditions for the one- and two-year, 24-hour design storm.[249] As discussed in the Water Supply Assessment for this project, the project would request a modified compliance with the first submittal of the Stormwater Control Plan. The modified requirements would be a 40 percent reduction in the rate and a 10 percent reduction in the volume of runoff for the 2-year, 24-hour design storm.[250] To meet these modified requirements, the proposed project would include rainwater collection cisterns that would manage stormwater onsite and limit demand on both the collection system and wastewater facilities resulting from stormwater discharges. Compliance with the San Francisco Stormwater Management Ordinance would slow runoff from the site, further reducing erosion from existing site conditions.

***Construction-Related Stormwater Runoff***

As discussed in Section A, Project Description, implementation of the proposed project would create and/or replace more than 5,000 square feet of impervious surface and would involve demolition, excavation (approximately 134,000 cubic yards of soil onsite and 6,600 cubic yards of material for street improvements), site preparation, and construction to occur over a period of approximately 31 months. Excavation, site preparation, and grading would expose soil and could result in erosion and excess sediment in stormwater runoff being carried into the combined sewer system. Excavation and site preparation activities, especially during the wet season, have the greatest potential to adversely affect water quality. In addition, stormwater runoff from demolition debris, soil stockpiles, temporary onsite use and storage of vehicles, fuels, wastes, or other hazardous materials could carry pollutants to the combined sewer system if proper handling methods are not employed.

Runoff from the project site would drain into the city's combined sewer system, so that such runoff would be properly treated to meet the city's Bayside NPDES Permit and the U.S. EPA's Combined Sewer Overflow Control Policy. Construction site runoff from projects that drain to the combined sewer system is regulated under Public Works Code article 4.2, section 146, and requires a project application to the SFPUC, as described in Section E.15, Geology and Soils; and Section E.17, Hazards and Hazardous Materials. In accordance with these regulations, the project sponsor or its contractor(s) must prepare an erosion

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248 San Francisco Regional Water Quality Control Board, Waste Discharge Requirements for the Southeast Treatment Plant, North Point Wet Weather Facility and Bayside Wet Weather Facilities and Wastewater Collection System, Order No. R2-2013-0029, NPDES No. CA0037664, adopted August 2013, *https://www.waterboards.ca.gov/rwqcb2/board_decisions/adopted_orders/2013/R2-2013-0029.pdf*, accessed January 12, 2019.

249 SFPUC, San Francisco Stormwater Management Requirements and Design Guidelines, May 2016, *http://www.sfwater.org/Modules/ShowDocument.aspx?documentID=9026*, accessed January 23, 2019.

250 SFPUC, *Water Supply Assessment for San Francisco Gateway Project*, adopted June 9, 2020, Resolution No. 20-0126.

sediment control plan or a stormwater pollution prevention plan, and are required to submit a construction site runoff control permit application to the SFPUC prior to any land-disturbing activities. An erosion sediment control plan would specify best management practices and erosion and sedimentation control measures to prevent sediment from entering the city's combined sewer system.[251] Construction best management practices that could be implemented as part of the proposed project may address, for example, inspection and maintenance, water conservation, spill prevention and control, street cleaning, and prevention of illicit discharge to the combined sewer system. These best management practices would minimize disturbance to the project site, adjacent areas, and storm drains and would retain sediment.[252] The SFPUC's Construction Runoff Control Program staff enforces this requirement through periodic and unplanned site inspections. In addition, prior to the commencement of any land-disturbing activities, a construction site runoff control permit would be obtained from the SFPUC. With discharge to the combined sewer system, in accordance with the regulatory requirements described above, water quality impacts from construction-related stormwater runoff would be less than significant.

***Construction-Related Dewatering***

Construction dewatering in areas with shallow groundwater would be required during excavation activities. The SFPUC's Wastewater Enterprise, Collection Systems Division, provides the permits for dewatering. The SFPUC would require any construction dewatering water to be sampled prior to issuance of the batch wastewater discharge permit pursuant to the U.S. EPA's Handbook for Sampling and Sample Preservation of Water and Wastewater.[253] If the groundwater is contaminated, it would undergo specific handling and disposal procedures and would be treated prior to any discharge. As discussed in the project description, the groundwater level at the project site is approximately 3 to 6 feet below ground surface. Because the depth of excavation for the foundation and utilities would be up to 10 feet below ground surface and piles would be extended up to 60 feet below the existing grade, groundwater dewatering would likely be required during construction. If groundwater is encountered during construction, a Batch Wastewater Discharge Permit would be required from the SFPUC, pursuant to article 4.1 of the public works code, to ensure that groundwater discharges meet specified water quality standards before they may be discharged from the proposed project.[254] If soil borings and wells are used for dewatering, these dewatering activities would be required to comply with article 12B of the public health code (the Soil Boring and Well Regulation Ordinance). With discharge to the combined sewer system, in accordance with the regulatory requirements described above, water quality impacts from construction-related dewatering would be less than significant.

***Operation – Wastewater and Stormwater Discharges***

After construction, the proposed project would be required to comply with applicable water quality regulations for disposal of wastewater in occupied buildings. Typical wastewater discharges would include sanitary sewage from building occupants and employees and commercial wastewater from PDR uses. Stormwater discharges would include runoff from streets, sidewalks, and other impervious surfaces, such as the rooftops of buildings A and B. Wastewater discharges from the proposed project would be subject to the

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251 Best management practices are detailed in the SFPUC's Construction Best Practices Handbook, August 2013, *http://sfwater.org/modules/showdocument.aspx?documentid=4282*, accessed August 19, 2019.

252 Best management practices are detailed in the SFPUC's Construction Best Practices Handbook, August 2013, *http://sfwater.org/modules/showdocument.aspx?documentid=4282*, accessed August 19, 2019.

253 SFPUC, Batch Wastewater Permit Discharge Application Instructions, July 17, 2019, *https://sfwater.org/modules/showdocument.aspx?documentid=2326*, accessed August 19, 2019.

254 SFPUC, Batch Wastewater Permit Discharge Application Instructions, July 17, 2019, *https://sfwater.org/modules/showdocument.aspx?documentid=2326*, accessed August 19, 2019.

permit requirements of article 4.1 of the public works code and supplemented by San Francisco Public Works Order No. 158170. Article 4.1 of the public works code addresses the city's industrial waste pretreatment program to protect human health and the environment by preventing the discharge of pollutants into the combined sewer system.[255] The San Francisco Public Works order number 158170 supplements article 4.1 of the public works code and imposes industrial waste discharge limits on wastewater discharges into the city's combined sewer system.[256] Accordingly, commercial users of the site would be required to develop and implement a pollution prevention program and comply with the pretreatment standards and discharge limitations specified in article 4.1. These dischargers would also be required to monitor the discharge quality for compliance with permit limitations. Project-generated wastewater and stormwater would flow into the city's combined sewer system and would be treated to standards in the city's Bayside NPDES Permit prior to discharge to San Francisco Bay.

The city requires all projects creating and/or replacing 5,000 square feet or more of impervious surface to comply with stormwater management requirements and to submit a stormwater control plan, a signed and recorded Maintenance Agreement, and a signed Certificate of Acceptable Construction. The stormwater control plan is required to demonstrate that the project meets the stormwater quality performance standards contained in the 2016 Stormwater Management Requirements and Design Guidelines.[257] As discussed under Impact UT-2 in Section E.10, Utilities and Service Systems, the proposed project would incorporate design features to limit the amount of water entering the combined sewer system. The proposed project would also implement rainwater harvesting by capturing stormwater onsite in cisterns on the first level of each building (see Figure 7, p. 12); the capacity of these cisterns would be designed pursuant to the 2016 Stormwater Management Requirements and Design Guidelines. The captured stormwater would be metered and discharged to the combined sewer system and conveyed to the Southeast Treatment Plant. As discussed in the Water Supply Assessment for the project, the proposed project would request modified compliance with the first submittal of the stormwater control plan. The modified requirements would be a 40 percent reduction in the rate and a 10 percent reduction in the volume of runoff for the 2-year, 24-hour design storm.[258] As explained above on p. 172, the Southeast Treatment Plant has a secondary treatment capacity of 150 mgd but is permitted for peak wet-weather flows of up to 250 mgd. Wet-weather excess flows of up to 100 mgd receive only primary treatment. Measures to slow the discharge of stormwater runoff from the project site reduce the peak flows entering the treatment plant during and after a storm and result in less wastewater discharged that has received only primary treatment, reducing the potential to exceed water quality standards.

In summary, by implementing post-construction best management practices[259] and implementing construction site runoff requirements in accordance with the public works code, conflicts with an existing water quality control plan would not occur. In addition, the project would not create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems (as more thoroughly discussed in Impact UT-2) or provide additional sources of polluted runoff. Water quality impacts related to

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255 San Francisco Public Works Code article 4.1, *http://library.amlegal.com/nxt/gateway.dll/California/publicworks/publicworkscode?f=templates$fn=default.htm$3.0$vid=amlegal:sanfrancisco_ca$sync=1*, accessed August 30, 2019.

256 San Francisco Public Works Order No. 158170, *https://sfpublicworks.org/sites/default/files/Industrial_Waste_Discharge_Limits.pdf*, accessed August 30, 2019.

257 SFPUC, Stormwater Management Requirements and Design Guidelines, May 2016, *http://sfwater.org/modules/showdocument.aspx?documentid=9026*, accessed October 20, 2017.

258 SFPUC, *Water Supply Assessment for San Francisco Gateway Project*, adopted June 9, 2020, Resolution No. 20-0126.

259 Post-construction best management practices are long-lasting treatment features such as cisterns, green roofs, bioretention basins and planters, permeable pavement, and infiltration trenches.

a violation of water quality standards or degradation of water quality or stormwater flows would be less than significant. No mitigation measures are required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, excavation and foundation work, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would have similar water quality impacts to those of the proposed project, but would include a slightly larger footprint. Within the expanded footprint, additional ground disturbance would occur where the streetscape improvements would be completed; such disturbances would extend approximately 3 feet below the ground surface. Similar to the proposed project, the expanded streetscape variant would implement post-construction best management practices and implement construction site runoff requirements in accordance with the public works code, and conflicts with an existing water quality control plan would not occur. In addition, the expanded streetscape variant would not create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems (discussed in Impact UT-2) or provide additional sources of polluted runoff. Water quality impacts related to a violation of water quality standards or degradation of water quality or stormwater flows would be less than significant. No mitigation measures are required. This topic will not be addressed in the EIR.

**Impact HY-2 The proposed project or variant would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin or conflict with or obstruct implementation of a sustainable groundwater management plan. (Less than Significant)**

**PROPOSED PROJECT**

The project site is in the Islais Valley Groundwater Basin, which covers an area of approximately 5,900 acres.[260] Recharge to the Islais Valley Groundwater Basin is estimated at 1,836 acre-feet per year, with sources of recharge including infiltration of rainfall, irrigation return flows, and leakage from water and sewer pipes.[261] The Islais Valley basin does not currently contribute to the city's water supply. In 2017, the SFPUC began pumping water from the Westside Groundwater Basin aquifer and will continue to expand wells in this basin to blend 4 mgd of treated groundwater with the municipal water supply by 2021.[262] The Islais Valley basin is not included in the SFPUC groundwater management program at this time. The proposed project would continue to be connected to the existing SFPUC potable water infrastructure and would not rely on wells for its water supply. Furthermore, the existing site is covered entirely in impervious surfaces, so that infiltration of rainwater into the groundwater basin and groundwater recharge at the project site is currently minimal. This condition would continue under the proposed project because after construction the site would consist of impervious surfaces, except for the addition of street trees and limited

[260] California Department of Water Resources, California's Groundwater Bulletin 118, 2003 Update, Islais Valley Groundwater Basin, February 2004, *https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-B118-Basin-Descriptions/B118-Basin-Boundary-Description-2003---2_033.pdf*, accessed August 19, 2019.

[261] California Department of Water Resources, California's Groundwater Bulletin 118, 2003 Update, Islais Valley Groundwater Basin, February 2004, *https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-B118-Basin-Descriptions/B118-Basin-Boundary-Description-2003---2_033.pdf*, accessed August 19, 2019.

[262] SFPUC, San Francisco Groundwater Supply Project, 2013, *https://sfpuc.sharefile.com/share/view/sfea7a8f29b54f499*, accessed August 26, 2019.

landscaping features. Therefore, operation of the proposed project would not deplete groundwater supplies in the project area or conflict with a sustainable groundwater management plan.

As discussed above on p. 154 and in Section E.15, Geology and Soils, groundwater depths vary between 3 and 6 feet below existing grades across the project site. Dewatering of excavations during construction is likely to occur and could temporarily lower groundwater levels in the project vicinity. However, any effects of construction-related groundwater dewatering would be temporary. Once dewatering is completed, groundwater levels would return to normal over time. Currently, the SFPUC has a groundwater management program that monitors and records data concerning groundwater conditions in the Westside Basin, but this management plan does not include the Islais Valley basin. Therefore, the project would not conflict with any sustainable groundwater management plan.

In summary, the proposed project would not substantially deplete groundwater supplies, interfere substantially with groundwater recharge, or conflict with a sustainable groundwater management plan. The project would have a less-than-significant impact related to groundwater, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, excavation and foundation work, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would have groundwater impacts similar to those of the proposed project, but would include a slightly larger footprint. Within the expanded footprint, additional ground disturbance would occur where the streetscape improvements would be completed; such disturbances would extend approximately 3 feet below the ground surface. Similar to the proposed project, the expanded streetscape variant would not substantially deplete groundwater supplies, interfere substantially with groundwater recharge, or conflict with a sustainable groundwater management plan. The expanded streetscape variant would have a less-than-significant impact related to groundwater, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**Impact HY-3** **The proposed project or variant would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would result in substantial erosion or siltation onsite or offsite; substantially increase the rate or amount of surface runoff in a manner that would result in flooding onsite or offsite; or impede or redirect flood flows. (Less than Significant)**

**PROPOSED PROJECT**

The project site is covered entirely by impervious surfaces and does not contain any streams or water courses. Construction activities would require excavation below ground; however, after construction, the ground surface would remain substantially unchanged from existing conditions. Pursuant to the city's Better Streets Plan, trees and landscape features would be installed on the site. Approximately 3,500 square feet of landscaping would be installed, and the existing impervious surfaces that cover the entire project site would be reduced.[263] Incorporation of stormwater management features at the project site in accordance with the

[263] SFPUC, *Water Supply Assessment for the San Francisco Gateway Project*, adopted June 9,2020, Resolution No. 20-0126.

city's Stormwater Management Ordinance and Stormwater Design Guidelines would ensure that drainage from the project site would not cause onsite or offsite erosion, siltation, or flooding. There would be minimal potential for erosion because the site is covered entirely by impervious surface, and the incorporation of these stormwater management design features would further reduce the potential for erosion onsite. As a result, the proposed project would not affect surface drainage patterns, and no substantial impact relative to erosion and siltation, flooding on or offsite, or contributions to exceedances of stormwater drainage systems would occur. Therefore, the proposed project would not be expected to result in substantial erosion or flooding associated with changes in drainage patterns. The impact of the proposed project related to potential erosion or flooding would be less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, excavation and foundation work, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would have erosion or flooding impacts similar to those of the proposed project, but would include a slightly larger footprint. Within the expanded footprint, additional ground disturbance would occur where the streetscape improvements would be completed; such disturbances would extend approximately 3 feet below the ground surface. Similar to the proposed project, the expanded streetscape variant would not result in substantial erosion or flooding associated with changes in drainage patterns. The impact of the expanded streetscape variant related to potential erosion or flooding would be less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**Impact C-HY-1 The proposed project or variant, in combination with cumulative projects, would not result in cumulative impacts related to hydrology and water quality. (Less than Significant)**

**PROPOSED PROJECT**

The proposed project would result in no impact with respect to a release of pollutants in flood, tsunami, and/or seiche hazard areas. Therefore, the project would not have the potential to contribute to cumulative impacts related to these issue areas.

The geographic context for cumulative hydrology and water quality impacts is the Southeast Treatment Plant drainage basin (in the case of treatment capacity) and the vicinity of the project site (in the case of local stormwater infrastructure capacity). Cumulative projects within 0.25 mile of the project site are discussed above under Section B, Cumulative Setting (pp. 43 through 46).

The proposed project would result in less-than-significant impacts related to water quality, groundwater levels, alteration of drainage patterns, and the capacity of drainage infrastructure. Cumulative projects that exceed the city's threshold of 5,000 square feet of new or replaced impervious surfaces are required to comply with the same or similar water quality and drainage control requirements, such as the development of an erosion sediment control plan for construction activities and a stormwater control plan for postconstruction operation. The cumulative projects that may disturb at least 5,000 square feet of new or replaced impervious surfaces and are required to comply with these water quality and drainage control requirements would include all of the projects listed in Section B, Cumulative Setting, with the exception of the Bayview Community-Based Transportation Plan and the SFPUC Southeast Treatment Plant Projects. The

SFPUC projects included in the cumulative setting would be completed as part of the city's SSIP, which is a program that would upgrade the aging and seismically vulnerable combined sewer system on the city's Bayside and would improve the reliability and capacity at the Southeast Treatment Plant. Should the ground disturbance for any of these projects increase to 5,000 square feet or more, then these projects would also be required to comply with these water quality and drainage control requirements. The Bayview Community-Based Transportation Plan would not affect the drainage basin or infrastructure capacity, because these projects would include short-term traffic-calming projects and pedestrian safety improvements such as lighting, crosswalks, and bus shelters. The Quint-Jerrold Connector project would be subject to the applicable city requirements for water quality and drainage control and would install drainage under the new road. The 2270 McKinnon Avenue and SF Produce Market projects would be required to comply with the same or similar water quality and drainage control requirements for construction activities and postconstruction operation as the proposed project. These plans would be submitted to and approved by the SFPUC before construction and operations would commence.

Because development projects would be required to follow the same regulations as the proposed project, peak stormwater runoff rates and volumes resulting from design storms would gradually decrease over time as new projects are constructed in accordance with the stormwater management requirements. In addition, all stormwater and wastewater flows into the city's combined sewer system would be treated pursuant to the effluent discharge standards contained in the city's NPDES permit for the Southeast Treatment Plant. As a result, cumulative impacts with respect to drainage patterns, water quality, stormwater runoff, and stormwater capacity of the combined sewer system would be less than significant. Therefore, the proposed project would not combine with cumulative projects to result in a cumulative impact related to hydrology and water quality. Cumulative impacts would be less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, excavation and foundation work, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would have hydrology and water quality impacts similar to those of the proposed project, but would include a slightly larger footprint. Within the expanded footprint, additional ground disturbance would occur where the streetscape improvements would be completed; such disturbances would extend approximately 3 feet below the ground surface. Because development projects would be required to follow the same regulations as the expanded streetscape variant, peak stormwater runoff rates and volumes resulting from design storms would gradually decrease over time as new projects are constructed in accordance with the stormwater management requirements. In addition, all stormwater and wastewater flows into the city's combined sewer system would be treated pursuant to the effluent discharge standards contained in the city's NPDES permit for the Southeast Treatment Plant. As a result, cumulative impacts with respect to drainage patterns, water quality, stormwater runoff, and stormwater capacity of the combined sewer system would be less than significant. Therefore, the expanded streetscape variant would not combine with cumulative projects to result in a cumulative impact related to hydrology and water quality. Cumulative impacts would be less than significant, and no mitigation measures would be required. This topic will not be addressed in the EIR.

## E.17. Hazards and Hazardous Materials

| Topics: | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project or variant: | | | | | |
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | ☐ | ☐ | ☒ | ☐ | ☐ |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | ☐ | ☐ | ☒ | ☐ | ☐ |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | ☐ | ☐ | ☐ | ☐ | ☒ |
| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | ☐ | ☐ | ☐ | ☒ | ☐ |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? | ☐ | ☐ | ☐ | ☐ | ☒ |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☒ | ☐ | ☐ |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | ☐ | ☐ | ☐ | ☐ | ☒ |

The project site is not in an area covered by an airport land use plan or within two miles of a public airport or a public use airport; the project site is not adjacent to or near wildlands such that the project would directly or indirectly expose people or structures to risks associated with wildland fires; and the project site is not within 0.25 mile of an existing or proposed school. Therefore, topics E.17 (c), E.17 (e), and E.17 (g) are not applicable to the proposed project or expanded streetscape variant.

The information in this section is based on the phase I and phase II environmental site assessments[264] for the project site. In addition, the GeoTracker website, the California Department of Toxic Substances Control's EnviroStor website, and the U.S. EPA Envirofacts database were searched for records of toxic releases, hazardous waste, or other violations that could affect the project site. The Department of Toxic Substances Control maintains a hazardous waste and substances site list (Cortese list) pursuant to Government Code section 65962.5. The project site is not listed in the state and/or federal databases as a hazardous waste site on the Cortese list. The closest identified Cortese list site is at 2045 McKinnon Avenue, south of the project site; it consists of a closed leaking underground storage tank hazardous materials clean-up case, described further below.[265], [266]

**CURRENT OPERATIONS**

The four existing warehouse buildings are used by tenants for product receiving, storage, and distribution; no industrial activities occur onsite. Hazardous materials use onsite is limited to refrigerant and similar compounds used in the refrigeration systems, small volumes of cleaning and maintenance products, a hand-pumped gasoline tank, a wash station for cars, and propane tanks for forklift use. Several warehouse spaces are used to stage or store larger volumes of potentially hazardous materials, such as pallets of containers of building supplies (paints, sealants, etc.). Adjacent to the project site is an informal automobile maintenance and repair operation with empty containers of automobile maintenance compounds (antifreeze and coolant), used oil filters, and similar items along the property fence line.

As described in Section A, Project Description, the project sponsor submitted building permit applications for an interim use on the project site as of August 2020.[267] The interim use is parcel delivery service, focusing on last-mile e-commerce delivery, and occupies one half of the site (the two buildings west of I-280). One of the two buildings is used for vehicle staging and the other is used for warehousing of goods and loading of delivery vehicles. This use is temporary in nature and would ultimately be replaced by the proposed project, if it were to be approved.

**FORMER AND EXISTING HAZARDOUS MATERIALS**

***Former Underground Storage Tanks***

As discussed in the Section E.3, Cultural Resources, the subject properties contain four large, one-story, rectangular industrial warehouses, each with their own building number; Buildings 417 and 418 are associated with the 749 Toland Street address, and Buildings 427 and 428 are associated with 2000 McKinnon Avenue. The phase I environmental site assessment for the project site revealed five onsite underground storage tanks as recognized environmental conditions:[268] four underground storage tanks

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264 Iris Environmental, Phase I and Phase II Environmental Site Assessment, January 6, 2015. No activities have occurred on the project site, such as excavation of onsite soils, significant change in the use of existing buildings, or demolition of existing buildings, that would require preparation of an updated environmental site assessment for purposes of this analysis.

265 California Department of Toxic Substances Control, EnviroStor, 2020, *https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=749+Toland+Street%2C+san+francisco*, accessed September 3, 2020.

266 State Water Resources Control Board, GeoTracker, 2020, *https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=749+Toland+Street%2C+San+Francisco*, accessed September 3, 2020.

267 San Francisco Building Department (DBI) Permit #202008272769 (Building 417 shell) and San Francisco Building Department #202008272770 (Building 418 shell).

268 ASTM Standard E1527-13 defines a recognized environmental condition as (emphasis in original to indicate formally defined terms): "the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. *De minimis* conditions are not recognized environmental conditions."

along Selby Street and one at the northeastern end of Building 427. The underground storage tanks along Selby Street were 300-gallon capacity each and used for fuel oil to run boilers inside the warehouse buildings.[269] According to previous documentation, these underground tanks cannot be located, and it is speculated that they were removed in conjunction with the construction of the highway overpass. There are no records of soil, groundwater, or other environmental sampling to verify their removal. Regarding the recognized environmental condition at Building 427, there is evidence of a potential underground storage tank but no documentation about the tank.

A phase II environmental site assessment was conducted to investigate the recognized environmental conditions at the project site identified in the phase I environmental site assessment. Soil and groundwater samples were collected downgradient of the five underground storage tanks, adjacent to Buildings 417 and 427, and along the railroad sidings. The collected samples were analyzed for total petroleum hydrocarbons, polycyclic aromatic hydrocarbons, heavy-end hydrocarbons, and metals. The results were compared to U.S. EPA and California Environmental Protection Agency (Cal/EPA) environmental screening criteria to determine whether levels of these compounds exceeded the expected use criteria of the site.[270, 271]

The phase II environmental site assessment concluded that the project site soils contain petroleum hydrocarbons, polycyclic aromatic hydrocarbons, and metals (i.e., arsenic, barium, cobalt, and nickel) above the expected use criteria established by the U.S. EPA and Cal/EPA and determined that these contaminant levels are most likely related to historic fill activities at the project site. Furthermore, the phase II environmental site assessment concluded that onsite groundwater also contain heavy-end hydrocarbons and metals in certain locations, particularly at the western end of the project site.

***Historic Pest Control Activities***

Historic pest control activities were identified as a potential recognized environmental condition in the phase I environmental site assessment. To control weeds along railroad sidings, herbicides were applied in the past. Historically, warehouse buildings were also treated with termiticides to minimize structural damage. Although there is no documentation related to historic pest control activities, the age, ownership, and historical use of the buildings suggest that pest control compounds were historically used onsite.

Soil testing conducted as part of the phase II environmental site assessment determined that organochlorine pesticides were below risk-based screening levels and thus would not be expected to pose a health hazard for the proposed use.[272]

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269 Iris Environmental, Phase I and Phase II Environmental Site Assessment, p. 15, January 6, 2015.

270 Expected use criteria are chemical concentrations promulgated for a particular land use (i.e., residential, commercial, industrial). For the expected uses at the project site (commercial/industrial), groundwater samples are compared to non-drinking water environmental screening levels. Soil samples are compared to direct exposure environmental screening levels, including direct contact screening levels for commercial/industrial workers and construction workers.

271 U.S. EPA and Cal/EPA environmental screening levels are defined as chemical concentrations in environmental media (e.g., soil or groundwater) below which no additional regulatory attention is warranted. The screening levels are not regulatory cleanup standards but indicate when additional evaluation may be warranted. The San Francisco Bay Regional Water Quality Control Board Tier 1 groundwater screening levels for potential drinking and nondrinking water are used for the groundwater samples; for the soil sampling, Tier 1 shallow soil screening levels for residential and commercial/industrial land use where groundwater is a potential drinking water resource. The screening levels used to assess onsite contamination are conservative, because groundwater at the site would not be used as a drinking water resource.

272 Risk-based screening levels for this soil gas chemical are defined conservatively as the San Francisco Bay Regional Water Quality Control Board Environmental Screening Levels for shallow soil gas under residential land use and commercial land use.

### *Polychlorinated Biphenyls*

Pole-mounted and pad-mounted transformers may contain polychlorinated biphenyls, which are considered hazardous materials because of their toxicity. A plywood enclosure at the base of power poles in front of Building 417 was observed, and it was presumed that a transformer operated and maintained by PG&E is located in this enclosure.

Soil testing conducted as part of the phase II environmental site assessment determined that no polychlorinated biphenyls were present in onsite soils.

### *Asbestos*

Asbestos-containing building materials were confirmed to be present on the project site in the phase I environmental site assessment. Original construction of the warehouse buildings in the 1940s includes asbestos-containing building products such as Transite siding, asbestos-containing concrete, and pipe insulation. Asbestos-containing material was used for its fire-retardant properties during use as the Marine Corps Supply facility. Between 1998 and 2011, asbestos-containing wastes were removed on five occasions, totaling 5.02 tons.[273] Specific materials that may have been removed are unknown, because no specific abatement or removal report is available.

Based on soil samples in the site vicinity, the phase II environmental site assessment determined that there were trace levels of asbestos at several locations, with no discernable pattern to the detection. No screening criteria are available from the San Francisco Regional Water Quality Control Board for asbestos in soil. Low detection of asbestos is a frequent occurrence in fill soils in San Francisco, due to the widespread nature of bedrock containing naturally occurring asbestos in the vicinity.[274]

### *Naval Radiological Defense Laboratory*

Building 418 was used by the Naval Radiological Defense Laboratory for storage of radiological research equipment and possibly to store radioactive sources. Following decommissioning of the laboratory in 1969 and prior to private ownership, all areas involving radiological materials were surveyed and decontaminated.[275] Under the Formerly Used Defense Sites program, the United States Army Corps of Engineers conducted a Radiological Scoping Survey in 2013 to determine the presence of residual radiological impacts. In accordance with Nuclear Regulatory Commission guidelines, the Radiological Scoping Survey checked the area for alpha, beta, and gamma radiation emitters. The survey did not identify any radiation counts above the Nuclear Regulatory Commission screening guidelines, and no further actions were required.

### *Regulatory Setting*

The storage, use, generation, transport, and disposal of hazardous materials are highly regulated by federal, state, and local agencies. Information about relevant agencies and the laws, regulations, and programs they administer are summarized below.

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273 Iris Environmental, Phase I and Phase II Environmental Site Assessment, p. 13, January 6, 2015.
274 Iris Environmental, Phase I and Phase II Environmental Site Assessment, p. 16, January 6, 2015.
275 Iris Environmental, Phase I and Phase II Environmental Site Assessment, p. 19, January 6, 2015.

## FEDERAL AND STATE REGULATIONS

### *Hazardous Materials Management*

The U.S. EPA is the lead agency with responsibility for enforcing federal laws and regulations that govern hazardous materials with the potential to affect public health or the environment. The major federal laws and regulations U.S. EPA enforces that could relate to the management of hazardous materials on the project site are the Resource Conservation and Recovery Act and Toxic Substances Control Act.

### *Hazardous Materials Release Sites*

In California, U.S. EPA has granted most enforcement authority of federal hazardous materials regulations to Cal/EPA. Under the authority of Cal/EPA, the State Water Resources Control Board and Department of Toxic Substances Control are responsible for overseeing the remediation of contaminated soil and groundwater sites. The provisions of Government Code section 65962.5 (also known as the Cortese List) require the State Water Resources Control Board, Department of Toxic Substances Control, California Department of Health Services, and CalRecycle to submit information pertaining to sites that are associated with solid waste disposal, hazardous waste disposal, and/or hazardous materials releases to Cal/EPA.

### *Hazardous Materials Transportation*

In 1990 and 1994, the federal Hazardous Material Transportation Act was amended to improve regulations for the protection of life, property, and the environment from the inherent risks of transporting hazardous materials. The United States Department of Transportation developed hazardous materials regulations that govern the classification, packaging, labeling, transportation, and handling of hazardous materials, as well as employee training and incident reporting.[276] The transportation of hazardous materials is subject to both Resource Conservation and Recovery Act and United States Department of Transportation regulations.

In California, the California Highway Patrol, Caltrans, and Department of Toxic Substances Control are responsible for enforcing federal and state regulations pertaining to hazardous waste haulers for hazardous waste transportation on public roads. The transport of hazardous materials is regulated under the California Vehicle Code (California Code of Regulations Title 13) and can only be conducted under a registration issued by Department of Toxic Substances Control. Identification numbers are issued by Department of Toxic Substances Control or U.S. EPA for tracking hazardous waste transporters and treatment, storage, and disposal facilities for hazardous materials. The identification number is used to identify the hazardous waste handler and to track waste from point of origin to final disposal; all material transport takes place under manifest.

### *California Hazardous Materials Release Response Plans and Inventory Law of 1985*

The California Hazardous Materials Release Response Plans and Inventory Law of 1985 (Business Plan Act) requires the preparation of hazardous materials business plans and disclosure of hazardous materials inventories. A business plan includes an inventory of hazardous materials handled, facility floor plans showing where hazardous materials are stored, an emergency response plan, and provisions for employee training in safety and emergency response procedures (California Health and Safety Code sections 25500, et seq.). The business plan program is administered by the California Emergency Management Agency. A

[276] Code of Federal Regulations, Title 49, Transportation, Parts 171–180.

business plan is required if a hazardous substance would be stored for more than 30 days in any of the following quantities:

- 500 gallons or more of any solid
- 55 gallons or more of any liquid
- 200 cubic feet or more of any compressed gas
- Any acutely hazardous substance or radiological material that meets the federal threshold planning quantities listed in 40 Code of Federal Regulations Part 355, Subpart A.

***Hazardous Building Materials***

Workers who conduct asbestos abatement must be trained in accordance with state and federal Occupational Safety and Health Administration requirements. The air district oversees the removal of regulated asbestos-containing materials. All friable (i.e., crushable by hand) asbestos-containing materials or nonfriable asbestos-containing materials that may be damaged must be abated prior to demolition in accordance with applicable requirements. Friable asbestos-containing materials must be disposed of as asbestos waste at an approved facility. Nonfriable asbestos-containing materials may be disposed of as nonhazardous waste at landfills that accept such wastes.

Loose and peeling lead-based paint must be disposed of as a state and/or federal hazardous waste if the concentration of lead equals or exceeds applicable hazardous waste thresholds. State and federal Occupational Safety and Health Administration regulations require a supervisor who is certified with respect to identifying existing and predictable lead hazards to oversee air monitoring and other protective measures during demolition activities in areas where lead-based paint may be present. Special protective measures and notification of California Occupational Safety and Health Administration are required for highly hazardous construction tasks related to lead, such as manual demolition, abrasive blasting, welding, cutting, or torch burning of structures, where lead-based paint is present.

More specifically, demolition where lead-based paint may be present would be subject to the California Occupational Safety and Health Administration Lead in Construction Standard (8 California Code of Regulations section 1532.1), which requires development and implementation of a lead compliance plan when materials that contain lead would be disturbed during construction. The plan must describe activities that could emit lead, methods that would be used to comply with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. California Occupational Safety and Health Administration would require 24-hour notification if more than 100 square feet of materials that contain lead would be disturbed.

**LOCAL REGULATIONS**

***Hazardous and Acutely Hazardous Emissions***

The air district oversees the protection of air quality in the San Francisco Bay Area Air Basin, which includes the project site. Hazardous and acutely hazardous emissions during construction (e.g., demolition of buildings containing asbestos) and facility operations (e.g., emissions from diesel generators) are subject to health risk assessment regulations and permitted conditions of operation to protect nearby sensitive receptors.

### *Lead-Based Paint*

The San Francisco Building Code (chapter 34, section 3423) requires that any paint-disturbing repair, remodeling, or renovation work on the exterior of a pre-1979 building, which applies to the existing buildings at the project site, must be performed following lead-safe work practices. Both the San Francisco Building and Health Codes presume that any building built before 1979 has lead-based paint. The city's lead-safe work practices address surface preparation and recommend removal of lead-based paints in stages: wet scraping the surfaces, washing the surfaces, and sanding them with sanders with a high-efficiency particulate-air vacuum. Prior to and during removal, affected parties must be notified, access to the work areas must be restricted, and containment barriers need to be installed to prevent migration of lead-based paint. Site clean-up practices include removing all visible debris, keeping work areas clean by wet sweeping or by using a high-efficiency particulate-air vacuum, and disposing of contaminated debris in secured containers.

### *Asbestos-Containing Materials and Abatement*

The air district is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement and is to be notified 10 days in advance of any proposed demolition or asbestos abatement work. The notification must include (1) the address of the operation; (2) the names and addresses of those who are responsible; (3) the location and description of the structure to be altered, including size, age, prior use, and the approximate amount of friable (i.e., easily crumbled) asbestos; (4) scheduled start and completion dates for the asbestos abatement work; (5) the nature of the planned work and methods to be employed; (6) procedures to be employed to meet the air district's requirements; and (7) the name and location of the waste disposal site to be used. The air district randomly inspects asbestos removal operations and would inspect any removal operation about which a complaint has been received. Any asbestos-containing building material disturbance at the project site would be subject to the requirements of air district Regulation 11, Rule 2: Hazardous Materials; Asbestos Demolition, Renovation, and Manufacturing.

The local office of the state Occupational Safety and Health Administration must also be notified of any asbestos abatement activities. Asbestos abatement contractors must follow state regulations contained in the California Code of Regulations, Title 8, section 1529, and Title 8, sections 341.6 through 341.14, where there is asbestos-related work involving 100 square feet or more of asbestos-containing building material. Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractor and hauler of the material are required to file a Hazardous Waste Manifest that details the hauling of the material from the site and the disposal of it.

### *Hazardous Materials Management*

In California, state hazardous waste and material handling laws are enforced by Cal/EPA with the assistance of local agencies designated as Certified Unified Program Agencies. In San Francisco, the San Francisco Department of Public Health is the designated Certified Unified Program Agency. The Certified Unified Program Agency program consolidates specified administrative requirements, permits, inspections, and enforcement activities for the following existing state programs, as established by five different state agencies, and combines them into what is known as the Unified Program:

- Hazardous Waste Generator and Tiered Permitting Program (California Health and Safety Code chapter 6.5)
- Underground Storage Tank Program (California Health and Safety Code chapter 6.7)
- Aboveground Petroleum Storage Tank Program (Health and Safety Code chapter 6.67)
- California Accidental Release Prevention Program (Health and Safety Code chapter 6.95)
- Hazardous Materials Release Response Plan and Inventory (Business Plan) Program (Health and Safety Code chapter 6.95)
- Hazardous Material Management Plan and Hazardous Material Inventory Statement Program (California Fire Code and Health and Safety Code chapter 1)

The Unified Program requires facilities to properly manage and disclose which hazardous materials are used during facility operations to minimize the risk of a hazardous materials release and improve emergency response actions in the event of a release. In San Francisco, the provisions of the Hazardous Materials Release Plan and Inventory Program (e.g., requirements for preparation of a Hazardous Materials Business Plan) and California Accidental Release Prevention Program (e.g., requirements for preparation of a Risk Management Plan) have also been incorporated into articles 21 and 21A of the San Francisco Health Code to help enforce mandatory measures to minimize the risk of a hazardous materials release. In addition, article 22 of the San Francisco Health Code, entitled "Hazardous Waste Management," provides measures for safe handling of hazardous wastes in the city. It authorizes San Francisco Department of Public Health to implement the state hazardous waste regulations, including authority to conduct inspections and document compliance.

***Maher Ordinance***

San Francisco Department of Public Health administers article 22A of the San Francisco Health Code (also referred to as the Maher Ordinance), which requires applicable projects to assess, sample, analyze, and remediate (if necessary) subsurface contamination prior to the issuance of building permits. The Maher Ordinance applies to any project that could encounter hazardous materials in the subsurface soil or groundwater in areas that are known to contain fill material or are suspected to contain hazardous materials in the subsurface, sometimes referred to as Maher zones.[277] In these areas, the requirements apply to any sites that would excavate more than 50 cubic yards of soil. The proposed project is subject to the Maher Ordinance because proposed soil excavation would exceed 50 cubic yards, and the project site is mapped within a Maher zone.

In accordance with health code section 22.A.6, the Maher Ordinance requires the project sponsor to retain the services of a qualified professional to prepare a site history report and assess potential and/or known sources of subsurface contamination at the project site. Based on the site history report, the professional recommends whether the project sponsor should conduct subsurface investigation(s) to characterize the quality of the soil and groundwater that would be disturbed during project construction. If so recommended, the professional prepares a subsurface analysis report, based on the subsurface investigation(s), to evaluate hazardous materials in the soil and groundwater at the project site and determine whether they are causing or are likely to cause significant health and safety risks given the intended land use. If the subsurface analysis report indicates that hazardous substances are present in soil or groundwater exceeding the Department of Toxic Substances Control or Regional Water Quality Control

[277] Maher zones include areas with current or historical industrial use or zoning; areas within 100 feet of current or historical underground tanks; filled former Bay, marsh, or creek areas; and areas within 150 feet of a current or former elevated highway.

Board public health risk levels, the applicant must prepare a site mitigation plan. The site mitigation plan must describe the methods (e.g., source removal, treatment, vapor barrier installation, restrictions on uses or activities at the project site) recommended to ensure the intended use would not result in public health or safety hazards in excess of the Department of Toxic Substances Control and Regional Water Quality Control Board acceptable risk levels or other applicable standards. The site mitigation plan must include health and safety measures to protect construction workers and the public during construction, including how to address any unknown conditions encountered. The site mitigation plan must also outline the soil and groundwater handling procedures that would be followed in all areas that would be disturbed during construction, including dust control measures that would be used. The site mitigation plan must also identify any remedial actions that would be taken, including removal or treatment of soil or groundwater, or placing a cover over soil to avoid future exposures, implementing a long-term operations and maintenance plan, or recording use restrictions on the property. All documents required under the Maher Ordinance must be submitted to and approved by the San Francisco Department of Public Health prior to project construction.

**Impact HZ-1** **The proposed project or variant would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (Less than Significant)**

**PROPOSED PROJECT**

***Construction***

Project demolition would involve the abatement and disposal of hazardous building materials. Construction of buildings A and B and other site improvements would involve the storage, use, and transport of small amounts of hazardous materials (e.g., asphalt, fuel, lubricants, paint, and other substances). Site grading could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Each of these potential impacts is discussed in more detail below.

Hazardous Building Materials

Asbestos-containing building materials are present on the project site. Workers and the public could be exposed to hazardous building materials if such materials are not removed or abated prior to demolition of the existing buildings.

Demolition and construction activities would be required to follow all applicable standards and regulations for hazardous building materials, including the California Health and Safety Code. Currently, section 19827.5 of the California Health and Safety Code requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. As discussed above, the air district is to be notified 10 days in advance of any proposed demolition or abatement work. Pursuant to California law, the building department would not issue the required permit until the project sponsor has complied with the notice requirements described above.

If lead-based paint is discovered during construction activities, construction contractors would be required to comply with section 3425 of the San Francisco Building Code, which contains performance standards for lead-based paint, including clean-up and notification requirements.

Compliance with existing regulations governing the handling and disposal of hazardous building materials would reduce impacts to the public and environment from project construction to a less-than-significant level.

Contaminated Soil and Groundwater

During construction, particularly during excavation and grading, construction workers and nearby residents could be exposed to chemicals in the soil through inhalation of airborne dust or vapors if proper precautions are not implemented. In addition, construction dewatering in areas with shallow and potentially contaminated groundwater may be required during excavation activities (see Section E.16, Hydrology and Water Quality, for further discussion), which could affect construction workers.

U.S. EPA's Envirofacts, the State Water Resources Control Board's GeoTracker, and the Department of Toxic Substances Control's Envirostor websites were searched to identify toxic releases, hazardous waste, or other violations that would report hazardous materials contamination at the project site. The project site is not listed in the state and/or federal databases as a hazardous waste site on the Cortese list. The nearest Cortese listed site is south of the project site (2045 McKinnon Avenue) and consists of a closed leaking underground storage tank. The leaking underground storage tank resulted in soil contamination from diesel fuel. Remediation of the site began in 1992, and the case was closed on June 10, 1997.[278]

Additionally, the project site is in an area subject to San Francisco Health Code article 22A, commonly referred to as the Maher Ordinance. The overarching goal of the Maher Ordinance is to protect public health and safety by requiring appropriate handling, treatment, disposal, and, when necessary, remediation of contaminated soils and groundwater that are encountered in the building construction process. The project would result in 140,600 cubic yards of soil disturbance and excavation of up to 10 feet below existing grade in an area of known soil contamination. Therefore, the project is subject to the Maher Ordinance, which is administered and overseen by the San Francisco Department of Public Health.

In accordance with the Maher Ordinance, the project sponsor enrolled in the Maher program and submitted a phase I environmental site assessment for the project site. The report identified several recognized environmental conditions, including five underground storage tanks onsite. The report also noted the potential for soil and groundwater contamination due to observations of existing used oil filters, empty containers of antifreeze, industrial degreaser, and similar compounds along the property fence.

Subsequently, a phase II environmental site assessment was conducted to determine the level of soil and groundwater contamination in areas identified in the phase I environmental site assessment as having a potential for contamination. The phase II environmental site assessment concluded that the project site soils have levels of petroleum hydrocarbons, polycyclic aromatic hydrocarbons, and metals above the expected use criteria established by U.S. EPA and Cal/EPA and determined that these impacts are most likely related to historic fill activities at the project site. Furthermore, the phase II environmental site assessment

[278] State Water Resources Control Board, GeoTracker, 2020, *https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0607500423*, accessed September 3, 2020.

concluded that groundwater also has levels of heavy-end hydrocarbons and metals in certain locations, particularly at the western end of the project site, that are above the expected use criteria.

To comply with regulatory requirements in articles 22A and 22B of the Maher Ordinance, based on the results of the prior phase I and phase II environmental site assessments, the health department notified the project sponsor that a site mitigation plan would be required that includes measures to reduce potential risks to the environment and to protect construction workers, nearby residents, workers, and/or pedestrians from potential exposure to hazardous substances and underground structures during soil excavation and grading activities.[279] The site mitigation plan would be reviewed and approved by the San Francisco Health Department prior to construction. The site mitigation plan would describe known and potential environmental conditions. It would include soil, groundwater, and stormwater management protocols such as sampling and proper disposal of any hazardous waste encountered during excavation. Implementation of a site mitigation plan would reduce potential soil and groundwater contamination prior to or during construction of the proposed project.

In addition, specified construction procedures at a minimum must comply with local building code section 106A.3.2.6.3 related to construction dust control. A required construction dust control plan would identify best management practices to reduce dust during construction, such as limiting travel on unpaved roads; wetting and tarping solid bulk material for offsite transport; and paving main access points to the project site.

As described in Section E.16, Hydrology and Water Quality, the proposed project would be subject to the city's Construction Site Runoff Control Ordinance, and an erosion sediment control plan would be required under article 4.2, section 146 of the San Francisco Public Works Code. In accordance with these regulatory requirements, the project sponsor would also be required to prepare and implement a storm water pollution prevention plan or an erosion sediment control plan, and a construction site runoff control project application to the SFPUC, to minimize construction-related water quality impacts. The storm water pollution prevention plan and erosion sediment control plan would identify hazardous materials sources in the construction area and recommend site-specific best management practices (i.e., stormwater controls) to prevent discharge of these materials into stormwater and bay waters. The minimum best management practices that would be required include maintaining an inventory of materials used onsite; storing chemicals in water-tight containers protected from rain; developing a spill response plan and procedures to address hazardous and nonhazardous spills; maintaining spill cleanup equipment onsite; assigning and training spill response personnel; and preventing leaks of oil, grease, and fuel from equipment. In accordance with the Construction General Stormwater Permit, the project sponsor must ensure that the construction site is visually inspected weekly, and daily during rain events, and must implement corrective actions if any shortcomings are identified.

Through compliance with existing regulations requiring implementation of a site mitigation plan, a dust control plan, a storm water pollution prevention plan, and an erosion sediment control plan, which collectively require the proper disposal and transport of hazardous materials, and response procedures for accidental releases—project construction would not expose the public or the environment to significant

[279] Awwad, Mamdouh, Senior Environmental Health Inspector, San Francisco Department of Public Health, email correspondence between Mamdouh Awwad and Ken Sun (Prologis, Inc.), May 8, 2018.

impacts related to onsite soil and groundwater contamination. Therefore, the potential risk from onsite soil and groundwater contamination during project construction would be less than significant.

Transportation and Use of Hazardous Materials

Small amounts of hazardous materials (e.g., asphalt, fuel, lubricants, or paint) may be used in project construction. These materials would be transported to the project site via local roadways, such as Toland Street, Rankin Street, Kirkwood Avenue, McKinnon Avenue, and I-280 (see Figure 18, p. 31). The transportation of hazardous materials is subject to applicable local, state, and federal regulations, which have been specifically designed to minimize the risk of upset during routine construction activities. As described above under "Regulatory Setting," regulations governing hazardous materials transport are included in California Code of Regulations Title 22 and the California Vehicle Code (California Code of Regulations Title 13), and transportation of hazardous materials can only be conducted under a registration issued by Department of Toxic Substances Control. State agencies with primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies are the California Highway Patrol, Caltrans, and the California state fire marshal. Together, these agencies determine container types used and license hazardous waste haulers for transportation of hazardous waste on public roads.

Through compliance with existing regulations, the transport of hazardous materials and the use of such materials onsite during project construction would result in a less-than-significant impact on the public and the environment.

***Operation***

Operation of the proposed project would require use, storage, and disposal of hazardous materials. The proposed project would provide space for several types of PDR uses, such as manufacturing and maker space, parcel delivery and last-mile delivery, wholesale and storage, and fleet management, as well as retail uses (see Table 3, p. 19). Depending on the particular tenants of the project, their uses could potentially involve the regular use of common hazardous materials such as paints, cleaners, toners, solvents, and disinfectants. These commercial products are labeled to inform users of potential risks and to instruct them in appropriate handling procedures.

Hazardous materials used by tenants (if required) would be transported to the project site via local roadways, such as Toland Street, Rankin Street, Kirkwood Avenue, McKinnon Avenue, and I-280 (see Figure 18, p. 31). During project operations, any future business operations would be required by law to comply with federal, state, and local laws, regulations, and policies regarding the handling, storage, and disposal of hazardous materials described above under "Regulatory Setting," including Cal/EPA's Unified Program (e.g., hazardous materials release response plans and inventories, California Uniform Fire Code hazardous materials management plans and inventories).

In San Francisco, the provisions of the Hazardous Materials Release Plan and Inventory Program (e.g., requirements for preparation of a Hazardous Materials Business Plan) and California Accidental Release Prevention Program (e.g., requirements for preparation of a Risk Management Plan) have also been incorporated into articles 21 and 21A of the San Francisco Health Code to help enforce mandatory measures to minimize the risk of a hazardous materials release. In addition, article 22 of the San Francisco Health Code, entitled "Hazardous Waste Management," provides measures for safe handling of hazardous wastes in the city. It authorizes the San Francisco Department of Public Health to implement the state hazardous

waste regulations, including authority to conduct inspections and document compliance. The San Francisco Department of Public Health is the Certified Unified Program Agency responsible for oversight of local businesses that handle hazardous materials.

In addition to state requirements, city requirements, such as article 22, section 1203 of the San Francisco Health Code, would require the project sponsor to comply with the minimum standards of management of hazardous waste as specified in Title 22 of the California Code of Regulations, chapter 30, division 4, which grants the city the right to conduct inspections of "any factory, plant, construction site, waste disposal site, transfer station, establishment or any other place or environment where hazardous wastes are stored, handled, processed, disposed of, or being treated to recover resources."[280]

***Conclusion***

Implementation of the proposed project could require routine transport, use, and storage of hazardous materials. Construction and operation of the proposed project are required by law to implement and comply with existing local, state, and federal regulations addressing hazardous materials. Each of these regulations is specifically designed to protect the public health through improved procedures for the handling of hazardous materials, better technology in the equipment used to transport these materials, and a more coordinated, quicker response to emergencies. Through compliance with these existing regulations, impacts related to the creation of significant hazards to the public through routine transport, use, disposal, and risk of accident or upset would be less than significant, and no mitigation measures would be necessary. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, excavation and foundation work, intensity, operations, and site plan as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would have hazardous materials impacts similar to those of the proposed project, but would include a slightly larger footprint. Within the expanded footprint, additional ground disturbance would occur where the streetscape improvements would be completed; such disturbances would extend approximately 3 feet below the ground surface. Similar to the proposed project, implementation of the expanded streetscape variant could require routine transport, use, and storage of hazardous materials. Construction and operation of the expanded streetscape variant are required by law to implement and comply with existing local, state, and federal regulations addressing hazardous materials. Each of these regulations is specifically designed to protect the public health through improved procedures for the handling of hazardous materials; better technology in the equipment used to transport these materials; and a more coordinated, quicker response to emergencies. Through compliance with these existing regulations, impacts related to the creation of significant hazards to the public through routine transport, use, disposal, and risk of accident or upset would be less than significant, and no mitigation measures would be necessary. This topic will not be addressed in the EIR.

[280] City Code, *http://library.amlegal.com/nxt/gateway.dll/California/health/article22hazardouswastemanagement?f=templates$fn=default.htm$3.0$vid=amlegal:sanfrancisco_ca$anc=JD_Article22*, accessed December 27, 2018.

**Impact HZ-2 The proposed project or variant would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. (Less than Significant)**

**PROPOSED PROJECT**

In 2017, the city updated its emergency response plan, prepared by the San Francisco Department of Emergency Management as part of the city's Emergency Management Program.[281] This plan covers hazard mitigation and disaster preparedness and recovery, and other emergency scenarios or events. The emergency response plan identifies hazards to which San Francisco is particularly susceptible (e.g., earthquakes, hurricanes, tsunamis, floods, winter storms, and acts of terrorism, including the use of chemical, biological, radiological, nuclear, and explosive weapons). The emergency response plan complies with several relevant state and federal directives for emergency planning, including the California Standardized Emergency Management System and the Incident Command System. The emergency response plan includes sections regarding operations, including management and procedures; staffing, operations, and logistics for the city's emergency operations center; and mutual aid, which involves other agencies. The emergency response plan assigns to city agencies and departments responsibilities for disaster planning; operations, including fire and rescue, law enforcement, human services, infrastructure, transportation, communications, and community support; and logistics, as well as finance and administration. The proposed project would not impair the implementation of the city's emergency response plan because it would not physically interfere with any primary emergency evacuation routes.

Additionally, the city applies fire safety measures primarily through provisions of the building and fire codes. Final building plans are reviewed by San Francisco Fire Department and the building department to confirm conformance with these provisions. In this way, potential fire hazards, including those associated with hydrant water pressures and emergency access, would be addressed during the permit review process. Compliance with fire safety regulations would ensure that construction and operation of the proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan, or expose people or structures to a significant risk of loss, injury, or death involving fires. Adherence to the San Francisco Fire Code and Building Code, along with implementation of the emergency response plan, would reduce potential impacts related to interference with emergency response or evacuation plans to less-than-significant levels, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, intensity, operations, and site plan as the proposed project, but would extend streetscape improvements for the entire cross section of the streets along the project perimeter to Better Streets standards. Because these changes would not alter the proposed land uses, their intensities, or layout, or impair the implementation of the city's emergency response plan by physically interfering with any primary emergency evacuation routes, the expanded streetscape variant would have emergency response or evacuation plan impacts similar to those of the proposed project and would not expose people or structures to a significant risk of loss, injury, or death involving fires. Adherence to the San Francisco Fire Code and Building Code, along with implementation of

[281] City and County of San Francisco, Emergency Response Plan: An Element of the CCSF Emergency Management Program, 2017, *https://sfdem.org/sites/default/files/CCSF%20Emergency%20Response%20Plan_April%202008%20-%20updated%20May%202017_Posted.pdf*, accessed August 9, 2019.

the emergency response plan, would reduce potential impacts related to interference with emergency response or evacuation plans to less-than-significant levels, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**Impact C-HZ-1 The proposed project or variant, in combination with cumulative projects, would not result in cumulative impacts related to hazards and hazardous materials. (Less than Significant)**

**PROPOSED PROJECT**

Environmental impacts related to hazards and hazardous materials are generally site specific. As discussed above under Impact HZ-1, impacts associated with hazards or hazardous materials during construction or operation of the proposed project would be less than significant with implementation of and compliance with applicable regulatory requirements for hazardous materials, such as the Maher Ordinance, California Code of Regulations Title 22, the California Vehicle Code, and article 22 of the San Francisco Health Code. Nearby cumulative projects would be subject to the same city, regional, state, and federal regulations designed to protect the public and the environment from risks associated with hazards and hazardous materials, and to ensure that emergency access routes are maintained. Because future development in the project vicinity would be subject to these same laws and regulations described in the "Regulatory Setting" section and discussed in Impact HZ-1, the proposed project combined with cumulative projects in the project vicinity would not create a significant cumulative impact related to hazards and hazardous materials. No mitigation measures would be required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, intensity, operations, and site plan as the proposed project, but would extend streetscape improvements for the entire cross section of the streets along the project perimeter to Better Streets standards. The expanded streetscape variant would have hazards and hazardous materials impacts similar to those of the proposed project because these changes would not alter the proposed land uses, their intensities, or layout, or impair the implementation of the city's emergency response plan. Impacts associated with hazards or hazardous materials during construction or operation of the expanded streetscape variant would be less than significant with implementation of and compliance with applicable regulatory requirements for hazardous materials, such as the Maher Ordinance, California Code of Regulations Title 22, the California Vehicle Code, and article 22 of the San Francisco Health Code. Nearby cumulative projects would be subject to the same city, regional, state, and federal regulations designed to protect the public and the environment from risks associated with hazards and hazardous materials, and to ensure that emergency access routes are maintained. Because future development in the project vicinity would be subject to these same laws and regulations described in the "Regulatory Setting" section and discussed in Impact HZ-1, the expanded streetscape variant, combined with cumulative projects in the project vicinity, would not create a significant cumulative impact related to hazards and hazardous materials. No mitigation measures would be required. This topic will not be addressed in the EIR.

## E.18. Mineral Resources

| Topics: | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project or variant: | | | | | |
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | ☐ | ☐ | ☐ | ☐ | ☒ |
| b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | ☐ | ☐ | ☐ | ☐ | ☒ |

In accordance with the California Surface Mining and Reclamation Act, the California Geological Survey has delineated areas by the presence and significance of mineral deposits.[282] The general plan indicates that mineral resources are not found in San Francisco to "any appreciable extent." Mineral resources therefore are not addressed in the general plan.[283] All land in San Francisco, including the project site, is designated Mineral Resource Zone 4 (MRZ-4) by the California Division of Mines and Geology under the Surface Mining and Reclamation Act of 1975.[284] This designation indicates that there is inadequate information available for assignment to any other mineral resource zone; therefore, the project site is not a designated area of significant mineral deposits. No resources are mapped within or near the project boundaries, and no active or proposed mines are present in the project site.[285] Therefore, topics E.18 (a) and E.18 (b) are not applicable to the proposed project or the expanded streetscape variant, and no mitigation measures would be required. These topics will not be addressed in the EIR.

[282] California Department of Conservation (CDC), California Surface Mining and Reclamation Policies and Procedures, Guidelines for Classification and Designations of Mineral Lands, 2004.

[283] San Francisco General Plan, Environmental Protection Element, *http://generalplan.sfplanning.org/*, accessed July 17, 2018.

[284] California Division of Mines and Geology, Update of Mineral Land Classification: Aggregate Materials in the South San Francisco Bay Production-Consumption Region, Open-File Report 96-03 and Special Report 146, parts I and II. 1996.

[285] California Division of Mines and Geology, Mineral Land Classification Map San Mateo and San Francisco Counties, Special Report 146 Plate 2.42, 1982, *ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_146-2/SR-146_Plate_2.42.pdf*.

## E.19. Energy

| Topics: | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project or variant: | | | | | |
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | ☐ | ☐ | ☒ | ☐ | ☐ |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | ☐ | ☐ | ☒ | ☐ | ☐ |

**Impact EN-1** **The proposed project or variant would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation; nor would it conflict with or obstruct a state or local plan for renewable energy or energy efficiency. (Less than Significant)**

**PROPOSED PROJECT**

The following discussion provides an assessment of the proposed project's construction and operational energy use, including energy use calculations and a discussion of energy conservation measures, and presents the estimated energy use associated with existing land uses at the project site. Electrical energy demand is measured by power flow, expressed in kilowatt-hours, and natural gas is measured in cubic feet of gas or by its heat content in British thermal units,[286] or therms. Diesel and gasoline fuel use is measured in gallons. Energy calculations were estimated in the San Francisco Gateway Project Energy Consumptions Calculations Memorandum and are based on project-specific inputs regarding anticipated construction equipment and vehicle activity for the duration of construction, project-specific operational vehicle trips and operational equipment usage, and CalEEMod default data regarding building operational energy consumption associated with the proposed land uses.[287] The specific construction-related and operational energy consuming activities are described in more detail in the following sections.

***Construction Energy***

Nonrenewable energy consumption would occur during the proposed project's construction. Construction energy consumption would be primarily in the form of indirect energy inherent in the production of materials used for construction (e.g., the energy necessary to manufacture a steel beam from raw materials) and direct energy consumption in the fuel used by construction equipment and vehicles. Construction-related energy consumption is roughly proportional to the size of the new buildings proposed.

Energy use associated with construction of the proposed project would include that associated with the use of diesel fuel consumption from on-road hauling trips and off-road construction diesel equipment, and gasoline and diesel fuel consumption from on-road worker commute and vendor trips. Construction of the

[286] 1 thousand British thermal units = 3.412 kilowatt-hours.
[287] AECOM, San Francisco Gateway Project Energy Consumption Calculations Memorandum, March 3, 2022.

proposed project would use approximately 98,500 gallons of diesel for off-road construction equipment. Approximately 36,600 gallons of diesel and 71,300 gallons of gasoline would be used for on-road trips during construction of the proposed project. Construction of the proposed project would be phased over a 31-month timeframe, so construction-related energy use would be temporary. The proposed project would also include the use of sustainable building materials, and would comply with the city's Construction and Demolition Debris Recovery Ordinance, which requires all construction and demolition debris material removed from a project to be recycled or reused, thereby conserving its embodied energy[288] and reducing future energy requirements to produce new materials and products. Furthermore, in comparison to other states and the country as a whole, construction projects in California and, in particular in the San Francisco Bay Area, use energy-efficient equipment and best practices. For example, the proposed project would adhere to the California Air Resource Board's heavy-duty equipment idling restrictions,[289] comply with the city's Construction and Demolition Debris Recovery Ordinance described above, and comply with the city's requirements for Director's Bulletin 2 Clean Construction Projects for Type 3 Priority Projects. The provisions relating to Type 3 applications included in planning department Planning Director's Bulletin 2 Clean Construction Project reduce criteria air pollutant and greenhouse gas emissions by requiring the use of lower emitting construction equipment; limiting idling of construction equipment to two minutes; and requiring construction contractors to maintain and properly tune all construction equipment in accordance with the manufacturer's specifications, which would ensure that equipment is operating efficiently. Furthermore, the proposed project would implement applicable regulatory standards of the CALGreen Code and sustainable construction practices consistent with the project's intent to seek LEED Gold certification or higher. CALGreen Code and LEED standards, among other things, reduce physical waste going to landfills and conserve energy associated with the embodied energy of construction materials. These practices limit wasteful and unnecessary energy consumption associated with construction.

State plans adopted for the purpose of promoting energy efficiency include the California Renewable Portfolio Standard, the Clean Energy and Pollution Reduction Act of 2015 (SB 350), the California Energy Efficiency Standards for Nonresidential Buildings, and the CALGreen Code. Construction activities under the proposed project would be conducted in accordance with all applicable laws and regulations, including applicable federal, state, and local laws that are intended to promote efficient utilization of resources and minimize environmental impacts.

As a result, construction activities would not result in inefficient, wasteful, or unnecessary use of fuel or other energy sources and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

***Operational Energy***

Energy use associated with operation of the proposed project would include onsite electricity use associated with PDR and retail uses in the two new buildings (e.g., building space heating, cooling, and lighting, as well as operation of equipment and machines); electricity for offsite water treatment and distribution; and fuel for vehicle travel, including commute trips by onsite employees as they commute to and from work and travel by visiting worker vehicles servicing the proposed land uses (i.e., those vehicles

[288] Embodied energy is the total energy required for the extraction, processing, manufacturing, and delivery of building materials to a project site.
[289] California Air Resources Board, Regulation for In-use Off-road Diesel-fueled Fleets, 2016, *https://ww2.arb.ca.gov/sites/default/files/2019-03/finalregorder-dec2011.pdf*, accessed November 2021.

associated with proposed land use operations but not related to onsite employees, such as parcel delivery trips).

In California, energy consumption in buildings is regulated by Title 24 of the California Code of Regulations. Title 24 includes standards that regulate energy consumption for the heating, cooling, ventilation, and lighting of residential and nonresidential buildings. In San Francisco, documentation demonstrating compliance with Title 24 standards is required to be submitted with a building permit application. Compliance with Title 24 standards is enforced by the building department. The proposed project would be required to comply with the standards of Title 24 and the San Francisco Green Building Code, which incorporates all mandatory elements of the 2019 CALGreen Code and stricter local requirements. [290] In addition, as of January 2018, new construction in the city is required to construct all off-street parking spaces for passenger vehicles and trucks with dimensions capable of accommodating future electrical charging infrastructure, and to install sufficient electrical infrastructure to supply electricity for electric vehicle charging, in accordance with San Francisco's Electric Vehicle Readiness Ordinance. [291]

Energy conservation design features to meet state and local goals for energy efficiency and renewable energy have been incorporated into the project design to further reduce wasteful, inefficient, and unnecessary consumption of energy during project operations. In addition to compliance with Title 24 standards, and accommodating of future electrical charging infrastructure, the proposed project would be designed without natural gas infrastructure. The project would incorporate a solar array that would be sized to meet the San Francisco Better Roof Ordinance; and generate electricity that could be used to offset the electrical use of the building and equipment and/or the electric vehicles housed at and/or visiting the site. Both the elimination of dependence on natural gas power and the inclusion of onsite solar generation would substantially increase the project site's reliance on renewable and clean energy sources. The proposed project would also incorporate TDM measures into its design, such as car-share parking, bicycle parking, and showers and lockers; it would also provide electric docking stations to minimize onsite idling and resultant fuel use by trucks. These features would minimize the amount of transportation fuel consumed. The project would seek LEED Gold certification or higher and would include the use of sustainable building materials; water- and energy-efficient mechanisms in the building design; and other measures that would further minimize the amount of fuel, water, and energy consumed. Furthermore, the project site is in an area with a low level of VMT per capita, in comparison to the regional average. [292] In this way, project siting and co-benefits of land-use and transportation planning would minimize potential transportation-related energy demand.

The following provides a summary of energy consumption in the form of electricity and natural gas for existing onsite uses, and electricity for the proposed project (no natural gas would be used for the proposed project). [293] The total estimated energy consumption for proposed onsite building operations would be approximately 23,689,000 kilowatt-hours per year for the proposed project. The estimated annual electricity

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290 City and County of San Francisco Department of Building Inspection, Administrative Bulletin AB093, updated 2020, *https://sfdbi.org/sites/default/files/AB-093.pdf*, accessed June 2020.

291 City and County of San Francisco Department of the Environment, San Francisco's Electric Vehicle Ready Community Blueprint, July 2019 https://sfenvironment.org/sites/default/files/editor-uploads/transportation_vehicle/san_francisco_ev_blueprint.pdf, accessed November 2021.

292 San Francisco Planning Department, Eligibility Checklist: CEQA section 21099 – Modernization of Transportation Analysis, San Francisco Gateway Project, December 19, 2018.

293 AECOM, San Francisco Gateway Project Energy Consumption Calculations Memorandum, March 3, 2022. Note that totals do not necessarily add as a result of rounding.

use associated with water supply, treatment, and distribution during operation of the proposed project would be approximately 7,400 kilowatt-hours per year. Energy consumption by existing land uses at the project site are estimated to be approximately 5,138,000 thousand British thermal units per year in natural gas and 3,708,500 kilowatt-hours per year in electricity to serve onsite building operations, and approximately 1,500 kilowatt-hours per year in electricity for water supply, treatment, and distribution. The net increase in energy consumption by the proposed project relative to existing site land uses would be approximately 19,979,000 kilowatt-hours per year in electricity, but a net decrease of approximately 5,138,000 thousand British thermal units per year due to the elimination of natural gas use onsite. Onsite renewable energy generation is not included in these building energy use estimates and would further reduce the project's dependence on regional energy sources because a portion of the project site's energy requirements would be met by this onsite renewable energy resource. During operation, the solar arrays on the project roofs would be sized to meet the San Francisco Better Roof Ordinance and would generate between approximately 1,600,000 and 1,900,000 kilowatt-hours annually from this renewable energy resource, which could power onsite uses or be sold back to the electricity grid.

Fuel consumption was also estimated for the proposed project and existing onsite operations, the results of which are summarized here.[294] Mobile sources used during operation of the proposed project would use approximately 1,711,500 gallons of diesel and 2,004,300 gallons of gasoline per year, based on an estimate of 49,102,000 annual VMT for worker and visitor trips to and from the site,[295] onsite vehicle activity, use of transportation refrigeration units on a portion of the visiting trucks, and potential fuel use by emergency generators. The existing onsite land use is estimated to require approximately 289,300 gallons of diesel fuel per year and 276,600 gallons of gasoline per year, based on an estimate of 6,965,300 annual VMT for worker and visitor trips. The net increase in fuel use by the proposed project relative to existing site land uses would be approximately 1,422,200 gallons of diesel per year and 1,727,700 gallons of gasoline per year. As described in more detail in Section E.8, Greenhouse Gas Emissions, project siting accounted for demand and regional proximity to the anticipated customer base to minimize VMT for parcel and last-mile delivery uses. Therefore, although the proposed project would result in increased diesel fuel and gasoline consumption, the siting of a new PDR site that is designed to accommodate parcel and last-mile delivery tenants closer to its customer base would improve efficiency over alternate siting, and would minimize the net increase in regional fuel consumption for the portion of the project that may include parcel and last-mile delivery tenants. Additionally, the project siting in a low-VMT region further contributes to the efficiency with which the proposed project's transportation-related energy demands may be met. Therefore, the fuel consumption associated with the proposed project would not be wasteful or inefficient.

Compliance with the Title 24 conservation standards of the California Code of Regulations and the local San Francisco Green Building Code would reduce the proposed project's consumption of fuel, water, and energy. Electric service would be provided to meet the needs of the project, as required by the California Public Utilities Commission, which obligates PG&E and the SFPUC to provide service to its existing and potential customers. PG&E and the SFPUC update their service projections to meet regional energy and water

294 Ibid.

295 VMT estimates reflect data obtained from Adavant and LCW Consultants, 749 Toland Street and 2000 McKinnon Avenue Project, Final Estimation of Project Travel Demand, December 10, 2021, with the exception of visitor trip distances for the Parcel and Last Mile Delivery use. These were revised for the purposes of fuel estimation to not account for the project siting efficiency and trip distance reductions, rather using the same travel distances applied to the other PDR uses for the VMT estimates. This is considered a conservative estimate and does not account for reduced vehicle travel that would be achieved as a result of the project's siting efficiency.

demand.[296] Energy conservation and production measures in the proposed project would decrease reliance on nonrenewable energy sources and increase use of renewable energy sources.

In summary, construction and operation of the proposed project would not use energy resources in an inefficient, wasteful, or unnecessary manner and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, the proposed project would have a less-than-significant impact on energy resources, and no mitigation measures are required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, site plan, development intensity, employment, and operations as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. Therefore, the proposed expanded streetscape variant would have energy resource impacts similar to those of the proposed project, but would include a slightly larger footprint. The footprint would involve additional ground disturbance to improve the remainder of the adjacent public rights-of-way. As a result, the same construction equipment and related fuel consumption used for the street and sidewalk improvements for the proposed project would be needed for the expanded streetscape variant but only for the limited area and time to complete the additional roadway, curb cut, sidewalk, planting, and other upgrades. For the same reasons cited for the proposed project, construction and operation of the expanded streetscape variant would not use energy resources in an inefficient, wasteful, or unnecessary manner and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, the expanded streetscape variant would have a less-than-significant impact on energy resources, and no mitigation measures are required. This topic will not be addressed in the EIR.

**Impact C-EN-1 The proposed project or variant, in combination with cumulative projects, would not result in a significant cumulative impact related to energy resources. (Less than Significant)**

**PROPOSED PROJECT**

The proposed project would use energy resources. The cumulative development projects identified in Section B, Cumulative Setting, and mapped in Figure 22 (p. 44), as well as other projects in the city, would be required by the building department to comply with Title 24 and the San Francisco Green Building Code. All new construction projects in San Francisco would be required to minimize the use of large amounts of fuel, water, or energy by, for instance, installing energy-efficient appliances and water-efficient fixtures, which would reduce cumulative impacts on fuel, water, and energy consumption. Additionally, statewide efforts are being made to increase power supply and to encourage energy conservation; the demand for energy from the proposed project would not be substantial in the context of the total demand in San Francisco and the state; and the proposed project would not require a major expansion of power facilities. As further detailed in Section E.8.3 of the Greenhouse Gas Emissions section of this initial study, the city also adopted updates to Ordinance 81-08 in July 2021, thereby establishing the following greenhouse gas reduction targets:

[296] Section E.12, *Utilities*, further discusses the project's requirements and impacts associated with utility systems, including power.

- by 2030, reduce sector-based greenhouse gas emissions to 61 percent below 1990 levels;
- by 2030, reduce consumption-based greenhouse gas emissions to 30 metric tons of $CO_2e$ per household or less, equivalent to a 40 percent reduction compared to 1990 levels;
- by 2040, reach net-zero sector-based emissions and sequester any residual emissions using nature-based solutions;[297] and
- by 2050, reduce consumption-based greenhouse gas emissions to 10 metric tons of $CO_2e$ per household or less, equivalent to an 80 percent reduction compared to 1990 levels.

Achieving these emissions reduction targets would be accomplished through a number of different strategies, including energy efficiency.[298]

Furthermore, much of San Francisco is an area with a per capita level of VMT that is low in comparison to the regional average.[299] Therefore, energy associated with transportation fuel for the proposed project and cumulative projects would be lower than for comparable land uses elsewhere in the region and would not result in a wasteful consumption of fuel to support transportation activities. Therefore, the proposed project, combined with cumulative projects in the project vicinity, would not result in a significant cumulative impact on energy resources, and no mitigation measures would be required. This topic will not be addressed in the EIR.

**EXPANDED STREETSCAPE VARIANT**

The expanded streetscape variant comprises the same land uses, site plan, development intensity, employment, and operations as the proposed project, but proposes rebuilding the entire cross section of the streets along the project perimeter to Better Streets standards. Therefore, the proposed expanded streetscape variant would have energy resource impacts similar to those of the proposed project, but would include a slightly larger footprint. The footprint would involve additional ground disturbance to improve the remainder of the adjacent public rights-of-way. For the same reasons cited for the proposed project, energy associated with transportation fuel for the expanded streetscape variant and cumulative projects would be lower than for comparable land uses elsewhere in the region and would not result in a wasteful consumption of fuel to support transportation activities. Therefore, the expanded streetscape variant, combined with cumulative projects in the project vicinity, would not result in a significant cumulative impact on energy resources, and no mitigation measures would be required. This topic will not be addressed in the EIR.

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

298 San Francisco established greenhouse gas emissions targets in section 902 of the environment code, as follows: by 2017, reduce greenhouse gas emissions by 25 percent below 1990 levels; by 2025, reduce greenhouse gas emissions by 40 percent below 1990 levels; and by 2050, reduce greenhouse gas emissions by 80 percent below 1990 levels.

299 San Francisco Planning Department, Eligibility Checklist: CEQA section 21099 – Modernization of Transportation Analysis, San Francisco Gateway Project, December 19, 2018.

## E.20. Agriculture and Forestry Resources

| Topics: | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| . Would the project or variant: | | | | | |
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | ☐ | ☐ | ☐ | ☐ | ☒ |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | ☐ | ☐ | ☐ | ☐ | ☒ |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | ☐ | ☐ | ☐ | ☐ | ☒ |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | ☐ | ☐ | ☐ | ☐ | ☒ |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use or forest land to non-forest use? | ☐ | ☐ | ☐ | ☐ | ☒ |

The project site is in an urbanized area of San Francisco. Furthermore, no land in the city has been designated by the California Department of Conservation's Farmland Mapping and Monitoring Program as active or important agricultural land. The project site does not contain agricultural uses and is not zoned for such uses; therefore, the proposed project or expanded streetscape variant would not require the conversion of any land designated by the state farmland mapping and monitoring program as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use. The proposed project or expanded streetscape variant would not conflict with any existing agricultural zoning or Williamson Act contracts because neither applies to the project site, nor would the project involve any changes to the environment that could result in the conversion of farmland.[300] Therefore, topics E.20 (a), (b), and (e) are not applicable to the proposed project or expanded streetscape variant. No mitigation is required, and this topic will not be addressed in the EIR.

No land in San Francisco is designated as forest land or timberland by the California Public Resources Code. The project site does not contain forest land or timberland and is not zoned for such uses; the proposed project or expanded streetscape variant would not convert any forest land or timberland to nonforest use; and they would not conflict with existing zoning for forest land or timberland use, nor would the proposed project or expanded streetscape variant involve any changes to the environment that could result in the

[300] California Department of Conservation Important Farmland in California Map (San Francisco is identified as "Urban and Built-Up Land"), 2012 – Updated 2015, *ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/regional/2012/bay_area_2012_fmmp_base.pdf*, accessed December 8, 2018.

conversion of forest land or timberland. Therefore, topics E.20 (c) and (d) are not applicable to the proposed project or expanded streetscape variant. No mitigation is required. This topic will not be addressed in the EIR.

## E.21. Wildfire

| Topics: | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, Would the project or variant: | | | | | |
| a) Substantially impair an adopted emergency response plan or emergency evacuation plans? | ☐ | ☐ | ☐ | ☐ | ☒ |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | ☐ | ☐ | ☐ | ☐ | ☒ |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | ☐ | ☐ | ☐ | ☐ | ☒ |
| d) Expose people or structure to significant risks including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | ☐ | ☐ | ☐ | ☐ | ☒ |

The city does not have any state responsibility areas for fire prevention or lands that have been classified as very high fire hazard severity zones.[301, 302] The project site, as well as the entire city, falls under the local responsibility area of the San Francisco Fire Department and is classified as local responsibility unzoned by the office of the state fire marshal.[303] Therefore, this topic is not applicable to the proposed project or expanded streetscape variant. Refer to Section E.17, Hazards and Hazardous Materials, for a discussion of wildland fire risks. No mitigation is required. This topic will not be addressed in the EIR.

[301] California Board of Forestry and Fire Protection, State Responsibility Area Viewer, updated July 2016, *https://bofdata.fire.ca.gov/projects-and-programs/state-responsibility-area-viewer/*, accessed July 22, 2019.

[302] California Department of Forestry and Fire Protection, Fire Hazard Severity Zones Maps, *https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/*, accessed July 22, 2019. California Department of Forestry and Fire Protection has determined that the City and County of San Francisco has no Very High Fire Hazard Severity Zones in Local Responsibility Areas.

[303] California Department of Forestry and Fire Protection, Fire Hazard Severity Zones Maps, *https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/*, accessed July 22, 2019. California Department of Forestry and Fire Protection has determined that the City and County of San Francisco has no Very High Fire Hazard Severity Zones in Local Responsibility Areas.

## E.22. Mandatory Findings of Significance

| Topics: | Potentially Significant Impact | Less than Significant with Mitigation Incorporated | Less than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project or variant: | | | | | |
| a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory? | ☐ | ☒ | ☐ | ☐ | ☐ |
| b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.) | ☒ | ☐ | ☐ | ☐ | ☐ |
| c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | ☒ | ☐ | ☐ | ☐ | ☐ |

The discussion of biological resources in Section E.14, p. 148, shows that the proposed project and expanded streetscape variant would not significantly affect any habitats, plant or animal communities, or threatened or endangered species. The discussion of cultural resources in Section E.3, p. 64, shows that the proposed project and expanded streetscape variant would have no effect on historic resources of the built environment; and that, with mitigation, the proposed project and expanded streetscape variant would not significantly affect archaeological resources or human remains. The discussion of tribal cultural resources in Section E.4, p. 78, shows that, with mitigation, the proposed project and expanded streetscape variant would not significantly affect tribal cultural resources. The discussion of geology and soils in Section E.15, p. 154, shows that the proposed project and expanded streetscape variant, with mitigation, would have a less-than-significant effect on paleontological resources.

The initial study has addressed cumulative impacts under each environmental topic and determined that cumulative impacts related to wind, cultural resources and tribal cultural resources would require mitigation to reduce impacts to a less-than-significant level. For all other topics, except those specifically identified below, the initial study supports a determination that the proposed project and expanded streetscape variant, in combination with cumulative projects, would not result in significant cumulative impacts. The EIR will address potential environmental impacts, including cumulative impacts, related to transportation and circulation, air quality, and noise. These topics will be evaluated in the EIR.

As discussed in Section E.5, Transportation and Circulation, Section E.6, Noise, and Section E.7, Air Quality, the proposed project and expanded streetscape variant have the potential to result in significant impacts on transportation, noise, and air quality, which all could impact human beings. Accordingly, these three topics will be analyzed further and included in the EIR.

The discussion in Section E, Evaluation of Environmental Effects, identifies significant impacts related to wind that could adversely affect human beings. Mitigation measures have been provided in this initial study to reduce these significant project-level impacts to a less-than-significant level. No project-level potentially significant impacts were identified for the following environmental issue areas that could affect human beings: land use and planning, population and housing, greenhouse gas emissions, shadow, recreation, utilities and service systems, public services, geology and soils, hydrology and water quality, and hazards and hazardous materials. Therefore, with implementation of the mitigation measures specified in Section E.9, Wind (Mitigation Measures M-WI-1a and M-WI-1b), the proposed project and expanded streetscape variant would not result in substantial adverse effects, direct or indirect, on human beings.

# F. MITIGATION MEASURES

The following mitigation measures have been agreed to by the project sponsor and are necessary to reduce the potentially significant environmental impacts of the proposed project and expanded streetscape variant to less-than-significant levels.

**Mitigation Measure M-CR-2**

**Archeological Testing.** Based on a reasonable presumption that archeological resources may be present in the project site, the following measures shall be undertaken to avoid any potentially significant adverse effects from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of an archeological consultant from the rotational qualified archeological consultants list maintained by the planning department. After the first project approval action or as directed by the environmental review officer, the project sponsor shall contact the department archeologist to obtain the names and contact information for the next three archeological consultants on the qualified archeological consultants list.

The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the environmental review officer. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the environmental review officer for review and comment and shall be considered draft reports subject to revision until final approval by the environmental review officer. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for a maximum of four weeks. At the direction of the environmental review officer, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less-than-significant level potential effects on a significant archeological resource as defined in CEQA Guidelines section 15064.5 (a)(c).

**Archeological Testing Program.** The purpose of the archeological testing program shall be to determine to the extent possible the presence or absence of archeological resources and to evaluate whether any archeological resource encountered on the site constitutes an historical resource under CEQA.

The archeological testing program shall be conducted in accordance with the approved archeological testing plan. The archeological consultant and the environmental review officer shall consult on the scope of the archeological testing plan, which shall be approved by the environmental review officer prior to commencing any project-related soils-disturbing

activities. The archeological testing plan shall be submitted first and directly to the environmental review officer for review and comment and shall be considered a draft subject to revision until final approval by the environmental review officer. The archaeologist shall implement the testing as specified in the approved archeological testing plan prior to and/or during construction.

The archeological testing plan shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project and lay out what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. The archeological testing plan shall also identify the testing method to be used, the depth or horizonal extent of testing, the locations recommended for testing, and the archeological monitoring requirements for construction soil disturbance, as warranted.

**Paleoenvironmental Analysis of Paleosols.** When a submerged paleosol is identified during the testing program, irrespective of whether cultural material is present, samples shall be extracted and processed for dating, flotation for paleobotanical analysis, and other applicable special analyses pertinent to identification of possible cultural soils and for environmental reconstruction.

**Discovery Treatment Determination.** At the completion of the archeological testing program, the archeological consultant shall submit a written summary of the findings to the environmental review officer. The findings memorandum shall describe and identify each resource and provide an initial assessment of the integrity and significance of encountered archeological deposits.

If the environmental review officer, in consultation with the archeological consultant, determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, the environmental review officer, in consultation with the project sponsor, shall determine whether preservation of the resource in place is feasible. If so, the proposed project shall be redesigned so as to avoid any adverse effect on the significant archeological resource, and the archeological consultant shall prepare an archeological resource preservation plan, which shall be implemented by the project sponsor during construction. The consultant shall submit a draft archeological resource preservation plan to the planning department for review and approval.

If preservation in place is not feasible, a data recovery program shall be implemented, unless the environmental review officer determines that the archeological resource is of greater interpretive than research significance,

and that interpretive use of the resource is feasible. The environmental review officer, in consultation with the archeological consultant, shall also determine whether additional treatment is warranted, which may include additional testing and/or construction monitoring.

**Consultation with Descendant Communities.** On discovery of an archeological site associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group, the environmental review officer and an appropriate representative of the descendant group shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to offer recommendations to the environmental review officer regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the archeological resources report shall be provided to the representative of the descendant group.

**Archeological Data Recovery Plan.** An archeological data recovery program shall be conducted in accordance with an archeological data recovery plan if all three of the following apply: 1) a resource has potential to be significant, 2) preservation in place is not feasible, and 3) the environmental review officer determines that an archeological data recovery program is warranted. The archeological consultant, project sponsor, and environmental review officer shall meet and consult on the scope of the archeological data recovery plan prior to preparation of a draft archeological data recovery plan. The archeological consultant shall submit a draft archeological data recovery plan to the environmental review officer. The archeological data recovery plan shall identify how the proposed data recovery program shall preserve the significant information the archeological resource is expected to contain. That is, the archeological data recovery plan shall identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.

The scope of the archeological data recovery plan shall include the following elements:

- *Field Methods and Procedures*: descriptions of proposed field strategies, procedures, and operations

- *Cataloguing and Laboratory Analysis*: description of selected cataloguing system and artifact analysis procedures

- *Discard and Deaccession Policy:* description of and rationale for field and post-field discard and deaccession policies

- *Security Measures:* recommended security measures to protect the archeological resource from vandalism, looting, and unintentionally damaging activities

- *Final Report*: description of proposed report format and distribution of results

- *Curation:* description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities

**Coordination of Archaeological Data Recovery Investigations.** In cases in which the same resource has been or is being affected by another project for which data recovery has been conducted, is in progress, or is planned, to maximize the scientific and interpretive value of the data recovered from both archeological investigations, the following measures shall be implemented:

A) In cases where neither investigation has yet begun, both archeological consultants and the environmental review officer shall consult on coordinating and collaboration on archeological research design, data recovery methods, analytical methods, reporting, curation and interpretation to ensure consistent data recovery and treatment of the resource.

B) In cases where archeological data recovery investigation is already underway or has been completed for a prior project, the archeological consultant for the subsequent project shall consult with the archeological consultant for the prior project, if available; review prior treatment plans, findings, and reporting; inspect and assess existing archeological collections/inventories from the site prior to preparation of the archaeological treatment plan for the subsequent discovery; and incorporate prior findings in the final report of the subsequent investigation. The objectives of this coordination and review of prior methods and findings shall be to identify refined research questions; determine appropriate data recovery methods and analyses; assess new findings relative to prior

research findings; and integrate prior findings into subsequent reporting and interpretation.

**Human Remains and Funerary Objects.** The treatment of any human remains and funerary objects discovered during any soils-disturbing activity shall comply with applicable state laws, including Section 7050.5 of the Health and Safety Code and Public Resources Code 5097.98. If human remains or suspected human remains are encountered during construction, the contractor and project sponsor shall ensure that ground-disturbing work within 50 feet of the remains is halted immediately and shall arrange for the protection in place of the remains until appropriate treatment and disposition have been agreed upon and implemented in accordance with this section. Upon determining that the remains are human, the project archeologist shall immediately notify the city's Medical Examiner of the find. The archeologist shall also immediately notify the environmental review officer and the project sponsor of the find. In the event of the Medical Examiner's determination that the human remains are Native American in origin, the Medical Examiner shall notify the California State Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall immediately appoint and notify a most likely descendant. The most likely descendant shall complete his or her inspection of the remains and make recommendations or preferences for treatment within 48 hours of being granted access to the site.

If the remains cannot be permanently preserved in place, the land owner may consult with the project archeologist, project sponsor, and CEQA lead agency and shall consult with the most likely descendant on recovery of the remains and any scientific treatment alternatives. The land owner shall then make all reasonable efforts to develop a burial agreement with the most likely descendant, as expeditiously as possible, for the treatment and disposition, with appropriate dignity, of human remains and funerary objects (as detailed in CEQA Guidelines section 15064.5(d)). In accordance with Public Resources Code 5097.98 (c)(1), the burial agreement shall address, as applicable and to the degree consistent with the wishes of the most likely descendant, the appropriate excavation, removal, recordation, scientific analysis, custodianship prior to reinterment or curation, and final disposition of the human remains and funerary objects. If the most likely descendant agrees to scientific analyses of the remains and/or funerary objects, the archeological consultant shall retain possession of the remains and funerary objects until completion of any such analyses, after which the remains and funerary objects shall be reinterred or curated as specified in the burial agreement.

Both parties are expected to make a concerted and good faith effort to arrive at an agreement, consistent with the provisions of Public Resources Code 5097.98. However, if the land owner and the most likely descendant are

unable to reach an agreement, the land owner, environmental review officer, and project sponsor shall ensure that the remains and/or mortuary materials are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity, in a location not subject to further or future subsurface disturbance, consistent with state law.

Treatment of historic-period human remains and/or funerary objects discovered during any soil-disturbing activity shall be in accordance with protocols laid out in the project archeological treatment document, and other relevant agreements established between the project sponsor, Medical Examiner, and environmental review officer. The project archeologist shall retain custody of the remains and associated materials while any scientific study scoped in the treatment document is conducted, after which the remains shall be curated or respectfully reinterred by arrangement on a case-by case-basis.

**Archeological Public Interpretation Plan.** The project archeological consultant shall submit an archeological public interpretation plan if a significant archeological resource is discovered during a project. If the resource to be interpreted is a tribal cultural resource, the archeological public interpretation plan shall be prepared in consultation with and developed with the participation of tribal representatives, including the Association of Ramaytush Ohlone and other interested Ohlone parties. The archeological public interpretation plan shall describe the interpretive product(s), locations or distribution of interpretive materials or displays, the proposed content and materials, the producers or artists of the displays or installation, and a long-term maintenance program. The archeological public interpretation plan shall be sent to the environmental review officer for review and approval. The archeological public interpretation plan shall be implemented prior to occupancy of the project.

**Archeological Resources Report.** Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the testing program to the environmental review officer. The archeological consultant shall submit a draft archeological resources report to the environmental review officer that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken, and if applicable, discusses curation arrangements. Formal site recordation forms (CA DPR 523 series) shall be attached to the archeological resources report as an appendix.

Once approved by the environmental review officer, copies of the archeological resources report shall be distributed as follows: California Archeological Site Survey Northwest Information Center shall receive one

copy, and the environmental review officer shall receive a copy of the transmittal of the archeological resources report to the Northwest Information Center. The environmental planning division of the planning department shall receive one bound hardcopy of the archeological resources report. Digital files that shall be submitted to the environmental division include an unlocked, searchable PDF version of the archeological resources report, GIS shapefiles of the site and feature locations, any formal site recordation forms (CA DPR 523 series), and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. The PDF archeological resources report, GIS files, recordation forms, and/or nomination documentation should be submitted via USB or other stable storage device. If a descendant group was consulted during archeological treatment, a PDF of the archeological resources report shall be provided to the representative of the descendant group.

**Curation.** Significant archeological collections and paleoenvironmental samples of future research value shall be permanently curated at an established curatorial facility. The facility shall be selected in consultation with the environmental review officer. Upon submittal of the collection for curation, the sponsor or archeologist shall provide a copy of the signed curatorial agreement to the environmental review officer.

**Mitigation Measure M-TCR-1 Tribal Cultural Resources Interpretive Program.**

**Preservation in Place.** In the event of the discovery of an archeological resource of Native American origin, the environmental review officer, the project sponsor, and the local Native American representative shall consult to determine whether preservation in place would be feasible and effective. Coordination shall take place with local Native American representatives, including the Association of Ramaytush Ohlone and other interested Ohlone parties. If it is determined that preservation-in-place of the tribal cultural resource would be both feasible and effective, then the archeological consultant, in consultation with the local Native American representative, shall prepare an archeological resource preservation plan, which shall be implemented by the project sponsor during construction. The consultant shall submit a draft archeological resource preservation plan to the planning department for review and approval.

**Interpretive Program.** If the environmental review officer, in consultation with local Native American representatives (including the Association of Ramaytush Ohlone and other interested Ohlone parties) and the project sponsor, determines that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option, then archeological data recovery shall be implemented as required by the environmental review

officer and in consultation with affiliated Native American tribal representatives.

After data recovery, the project sponsor, in consultation with local Native American representatives, shall prepare a tribal cultural resources interpretation plan to guide the interpretive program. The tribal cultural resources interpretation plan may be prepared in tandem with the archeological public interpretation plan described in Mitigation Measure M-CR-2: Archeological Testing. The tribal cultural resources interpretation plan shall be submitted to the environmental review officer for review and approval prior to implementation of the program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, cultural displays, educational panels, or other interpretive elements agreed upon by the environmental review officer, sponsor, and local Native American representatives. Upon approval of the tribal cultural resources interpretation and prior to project occupancy, the interpretive program shall be implemented by the project sponsor. Local Native American representatives who are substantially involved in preparation or implementation of the interpretive program shall be appropriately compensated by the project sponsor.

**Mitigation Measure M-WI-1a** **Wind Hazard Evaluation for Building Design and Streetscape Modifications.** If the proposed project's design, including the wind mitigation measures (M-WI-1b), is modified in any way that could affect ground-level wind conditions, the new design shall be evaluated by a qualified wind expert to determine the potential for the modified project to result in a new wind hazard exceedance (defined as the one-hour wind hazard criterion of 26 miles per hour equivalent wind speed). The evaluation may require wind tunnel testing by the qualified expert to determine whether the modified project would result in an exceedance of the wind hazard criterion. If the modified project could exceed the wind hazard criterion, the project buildings shall be shaped (e.g., by including setbacks or using other building design techniques) or other wind-baffling measures shall be implemented, so that the project does not result in an exceedance of the one-hour wind hazard criterion of 26 miles per hour equivalent wind speed.

**Mitigation Measure M-WI-1b** **Maintenance of Landscaping Features that Reduce Wind Hazards.** The project sponsor shall maintain, for the life of the proposed project buildings, all landscaping features required to ensure that the proposed project does not result in in an exceedance of the one-hour wind hazard criterion of 26 miles per hour equivalent wind speed. These features include installation

of nine evergreen street trees, each approximately 25 feet tall with a 15-foot-diameter canopy, along the eastern sidewalk of Toland Street *or* any landscaping features required pursuant to Mitigation Measure M-WI-1a: Wind Hazard Evaluation for Building Design and Streetscape Modifications.

**Mitigation Measure M-GE-5 Inadvertent Discovery of Paleontological Resources**

**Worker Environmental Awareness Training.** Prior to commencing construction, the project sponsor shall engage a paleontologist meeting the standards of the Society of Vertebrate Paleontology[304] to conduct training for all onsite construction workers regarding paleontological resources and the contents of the paleontological resources alert sheet, as provided by the planning department. The paleontological resources alert sheet shall be prominently displayed at the construction site, during ground-disturbing activities.

In addition, the project sponsor (through a designated representative) shall inform construction personnel of the immediate stop work procedures and contact information to be followed if bones or other potential fossils are unearthed at the project site, and the laws and regulations protecting paleontological resources. As new workers arrive at the project site for ground-disturbing activities, they shall be trained by the construction supervisor.

The paleontologist shall submit a letter confirming the timing of the worker training to the planning department. The letter shall confirm the project's location, the date of training, the location of the informational handout display, and the number of participants. The letter shall be transmitted to the planning department within five business days of conducting the training.

In the event of the inadvertent discovery of a paleontological resource during construction, excavations within 25 feet of the find shall temporarily be halted until the discovery is examined by a qualified paleontologist (as defined by the Society of Vertebrate Paleontology). Work in the sensitive area shall resume only when deemed appropriate by the qualified paleontologist, in consultation with the planning department.

The qualified paleontologist shall determine: 1) whether the discovery is scientifically significant; 2) the necessity for involving other agencies and stakeholders; 3) the significance of the resource; and 4) methods for resource recovery. If a paleontological resource assessment results in a determination that the resource is not scientifically important, this conclusion shall be documented in a paleontological evaluation letter to demonstrate

[304] Society of Vertebrate Paleontology, *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*, 2010, *https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines.pdf*, accessed January 2022.

compliance with applicable statutory requirements. The paleontological evaluation letter shall be submitted to the planning department for review within 30 days of the discovery.

If a paleontological resource is determined to be of scientific importance and there are no feasible avoidance measures, a paleontological mitigation program must be prepared by the qualified paleontologist engaged by the project sponsor. The mitigation program shall include measures to fully document and recover the resource and shall be approved by the planning department. Ground-disturbing activities in the project area shall resume and be monitored, as determined by the qualified paleontologist in collaboration with the planning department, for the duration of such activities.

The mitigation program shall include: 1) procedures for construction monitoring at the project site; 2) fossil preparation and identification procedures; 3) curation into an appropriate repository; and 4) preparation of a paleontological resources report at the conclusion of ground-disturbing activities. The report shall include dates of field work, results of monitoring, fossil identifications to the lowest possible taxonomic level, analysis of the fossil collection, a discussion of the scientific significance of the fossil collection, conclusions, locality forms, an itemized list of specimens, and a repository receipt from the curation facility. The project sponsor shall be responsible for the preparation and implementation of the mitigation program, in addition to any costs necessary to prepare and identify collected fossils, and for any curation fees charged by the paleontological repository. The mitigation program shall be submitted to the planning department for review within 10 business days of the discovery. The paleontology report shall be submitted to the planning department for review within 30 business days from conclusion of ground-disturbing activities, or as negotiated following consultation with the planning department.

# G. DETERMINATION

On the basis of this initial study:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.

DATE March 9, 2022

Lisa Gibson
Environmental Review Officer

# H. INITIAL STUDY PREPARERS

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| | |
|---|---|
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| Principal Environmental Planner (Transportation): | Wade Wietgrefe |
| Senior Transportation Planner: | Sherie George |
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**Project Sponsor Team**

Prologis (Project Sponsor)

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