



# SAN FRANCISCO PLANNING DEPARTMENT

## MITIGATED NEGATIVE DECLARATION

*Date:* July 24, 2013, amended on August 29, 2013 (amendments to the PMND are shown in deletions as strikethrough; additions in double underline)

*Case No.:* 2012.0153E

*Project Title:* 200 Paul Avenue

*Zoning:* PDR -2 (Core Production, Distribution, and Repair) District  
65-J Height and Bulk District

*Block/Lot:* 5431A/1F and 1G

*Lot Size:* 308,914 square feet (7.09 acres)

*Project Sponsor:* J. Gregg Miller, Pillsbury Winthrop Shaw Pittman LLP, for 200 Paul LLC  
(415) 983-1557

*Lead Agency:* San Francisco Planning Department

*Staff Contact:* Heidi Kline - (415) 575-9043, Heidi.Kline@sfgov.org

1650 Mission St.  
Suite 400  
San Francisco,  
CA 94103-2479

Reception:  
**415.558.6378**

Fax:  
**415.558.6409**

Planning  
Information:  
**415.558.6377**

## PROJECT DESCRIPTION

The project site is located on the north side of Paul Avenue midblock between Highway 101 and Third Street, and opposite Exeter and Gould streets. The site contains four existing industrial buildings (Buildings A, B, D, and F) totaling approximately 493,000 square feet. Two multi-story buildings at the front of the property are used as an Internet services exchange (ISE) in which space is leased by 200 Paul LLC, an affiliate of Digital Realty Incorporated to tenants operating colocation data centers and/ or hubs for telecommunication carrier services. Two single-story warehouse buildings in the rear of the site are used for storage by non-ISE-related tenants, as well as for temporary staging for construction projects within the ISE. The proposed project would allow for the expansion of an existing ISE use by providing 18 additional diesel backup generators for use by the ISE tenants during power outages. **(continued on next page)**

## FINDING

This project could not have a significant effect on the environment. This finding is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15064 (Determining Significant Effect), 15065 (Mandatory Findings of Significance), and 15070 (Decision to prepare a Negative Declaration), and the following reasons as documented in the Initial Evaluation (Initial Study) for the project, which is attached. Mitigation measures are included in this project to avoid potentially significant effects. See page 117.

In the independent judgment of the Planning Department, there is no substantial evidence that the project could have a significant effect on the environment.

Sarah B. Jones  
Environmental Review Officer

September 3, 2013

Date of Adoption of Final Mitigated  
Negative Declaration

## **PROJECT DESCRIPTION (continued)**

In order to provide sufficient area to add the generators, an approximately 16,000-square-foot portion of the southernmost warehouse (Building B) would be demolished and a new building wall constructed at the end of the shortened building. The existing generator service yard would be expanded to include 12 additional concrete pads for new diesel generators that are planned to be installed over a six-year period to meet the demand by new and existing ISE tenants for a backup power source for their operations. The existing generator service yard currently has 17 operational diesel backup generators and empty pad areas available for the future installation of another six generators. As a result of this generator service yard expansion, 18 existing parking spaces in the immediate area would need to be removed from alongside a portion of Building B and would be replaced by up to 21 new parking spaces in the area between the expanded generator service yard and the altered warehouse building. The drive aisle created to access these new parking spaces would provide an emergency vehicle connection between the existing parking areas on the west and east sides of the property. The environmental review also analyzes occupancy of an additional 60,000 square feet within the existing ISE facility.

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## List of Acronyms

$\mu\text{g}/\text{m}^3$	Micrograms Per Cubic Meter
AB	Assembly Bill
ADRP	Archeological Data Recovery Program
AMP	Archeological Monitoring Program
ARB	Air Resources Board
ASHRAE	American Society of Heating, Refrigerating and Air Conditioning Engineers
ASHRAE TC	American Society of Heating, Refrigerating and Air Conditioning Engineers Technical Committee
ATP	Archeological Testing Plan
BAAQMD	Bay Area Air Quality Management District
bgs	below ground surface
bhp	Brake-Horsepower
BMP	Best Management Practice
BVHP	Bayview Hunters Point
CA DPR	California Department of Park and Recreation
CA OHP	California Office of Historic Preservation
CAA	Clean Air Act
CalEEMod	California Emissions Estimator Model
CalTrans	California Department of Transportation
CAP	Clean Air Plan
CCAA	California Clean Air Act
CDMG	California Division of Mines and Geology
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CH <sub>4</sub>	Methane
CMP	Congestion Management Plan
CO	Carbon Monoxide
CO <sub>2</sub>	Carbon Dioxide
CO <sub>2</sub> E	Carbon Dioxide Equivalent
Corps	U.S. Army Corps of Engineers
CU	Conditional Use
dB	Decibels
dBA	Decibel A-weighting
DBI	Department of Building Inspection
DOE	Department of the Environment
DPH	Department of Public Health
DPM	Diesel Particulate Matter
DPW	Department of Public Works
EO	Executive Order
ERO	Environmental Review Officer
ESA	Environmental Site Assessment

FAR	Floor Area Ratio
FARR	Final Archeological Resources Report
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FIRMS	Flood Insurance Rate Maps
g/bhp-hr	Grams Per Brake-horsepower Hour
GHG	Greenhouse Gas Emissions
hp	Horsepower
HRER	Historic Resource Evaluation Response
IP	Internet Protocol
ISE	Internet Services Exchange
IT	Information Technology
ITE	Institute of Traffic Engineers
kW	kilowatt
L <sub>90</sub>	Noise level exceeded 90 percent of the time
L <sub>dn</sub>	Day-night Average Sound Level
LEED	Leadership in Energy and Environmental Design
LOS	Level of Service
MBTA	Migratory Bird Treaty Act
MTCO <sub>2</sub> E	Metric Tons of Carbon Dioxide Equivalent
MPO	Metropolitan Planning Organizations
MRZ	Mineral Zone
MTCO <sub>2</sub> /MWh	Metric Tons of Carbon Dioxide per Megawatt Hour
MW	Megawatt
MWh	Megawatt hour
N <sub>2</sub> O	Nitrous Oxide
NAHC	National American Heritage Commission
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NFIP	National Flood Insurance Program
NO <sub>2</sub>	Nitrogen Dioxide
NO <sub>x</sub>	Oxides of Nitrogen
NPDES	National Pollutant Discharge Elimination System
NRC	Noise Reduction Coefficient
NSR	New Source Review
NWIC	Northwest Information Center
PBB	Power Base Building
PCB	Polychlorinated Biphenyl
PDR	Production, Distribution, and Repair
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter with Diameter 10 microns or less
PM <sub>2.5</sub>	Particulate Matter with Diameter 2.5 microns or less
PRC	Public Resources Code
psf	Pounds Per Square Foot
PUD	Planned Unit Development
PUE	Power Effectiveness Ratio
QACL	Qualified Archeological Consultants List

RCRA-TSD	Resource Conservation and Recovery Act-Treatment, Storage and Disposal
RCRIS	Resource Conservation and Recovery Act Information System
ROG	Reactive Organic Gases
SB	Senate Bill
SCS	Sustainable Communities Strategy
SEWPCP	Southeast Water Pollution Control Plan
SFBAAB	San Francisco Bay Area Air Basin
SFCTA	San Francisco County Transportation Authority
SFHA	Special Flood Hazard Area
SFMTA	San Francisco Municipal Transportation Agency
SFPD	San Francisco Police Department
SFPUC	San Francisco Public Utilities Commission
SO <sub>2</sub>	Sulfur Dioxide
SPCC	Spill Prevention, Control and Countermeasures Plan
SWPP	Stormwater Pollution Prevention Plan
TAC	Toxic Air Contaminant
TKF	Turn-key Flex
USC	United States Code
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
VDECS	Verified Diesel Emissions Control Strategy
VOIP	Voice over Internet Protocol

**Initial Study**  
**200 Paul Avenue Internet Services Exchange Expansion**  
**200 Paul LLC**  
**Planning Department Case No. 2012.0153E**

This is the Initial Study for the proposed expansion of the Internet services exchange (ISE), also commonly referred to as a data center,<sup>1</sup> at 200 Paul Avenue (proposed project), prepared in accordance with the California Environmental Quality Act (CEQA). The property owner, 200 Paul LLC (project sponsor), is proposing to expand the generator service yard to add 18 diesel backup generators for use by existing and future tenants of the ISE.<sup>2</sup> An approximately 16,000-square-foot portion of an existing warehouse building (Building B) at the center of the project site would be removed to provide space for the generator service yard expansion and related parking lot modifications.

The 7.09-acre site (project site) is located on the north side of Paul Avenue midblock between Bayshore Boulevard/Highway 101 and Third Street in the Bayview/ South Bayshore District. An existing ISE facility, operated by 200 Paul LLC, an affiliate of Digital Realty Incorporated, occupies two multi-story buildings, Buildings D and F, at the front of the site. The project sponsor leases portions of two single-story warehouse buildings behind the ISE facility as storage space to non-ISE-related tenants, as well as using it for temporary staging for construction projects within the ISE.

## **I. PROJECT DESCRIPTION**

### **Project Location and Site Characteristics**

The project site is comprised of two legal lots of record, Assessor's Block 5431A, Lots 1F and 1G, and is located on the north side of Paul Avenue midblock between Bayshore Boulevard/Highway 101 to the west and Third Street to the east, as shown on Figure 1 on p. 7. The project site contains four existing buildings addressed as 200 Paul Avenue, Buildings A, B, D, and F, as shown on Figure 2 on p. 8. The site is located in an established older industrial area in the City's Bayview/ South Bayshore District. Lot 1F is approximately 72,523 square feet in area and Lot 1G is 236,391 square feet for a combined total of 308,914 square feet, or 7.09 acres, for the entire project site. Together, both lots form a rectangular-shaped site. Only one of the lots, Lot 1G, has frontage on Paul Avenue. Access to the rear parcel, Lot 1F, is provided via the driveways on the western and eastern side of Lot 1G.

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<sup>1</sup> A data center is a facility used to house computer systems and associated components. It generally includes redundant or backup power supplies, redundant data communications connections, environmental controls (e.g., air conditioning, fire suppression) and security devices. The San Francisco Planning Code categorizes such use as an Internet Services Exchange.

<sup>2</sup> In 1999 (Permit No. 9904100) and 2000 (Case No. 2000.0232), the project sponsor received approvals, for among other things, the installation of 20 standby generators. Under those approvals, the project sponsor installed 17 generators to date. As such the project sponsor currently has the discretionary approvals to install three additional generators under these previous entitlements. This Initial Study analyzes 18 generators, in order to study the cumulative effects of all generators anticipated to be installed in the future. However, the analysis under this Initial Study has no effect on the project sponsor's prior discretionary approvals for the existing 17 generators and the three generators that remain to be installed.

Figure 1 - Location Map

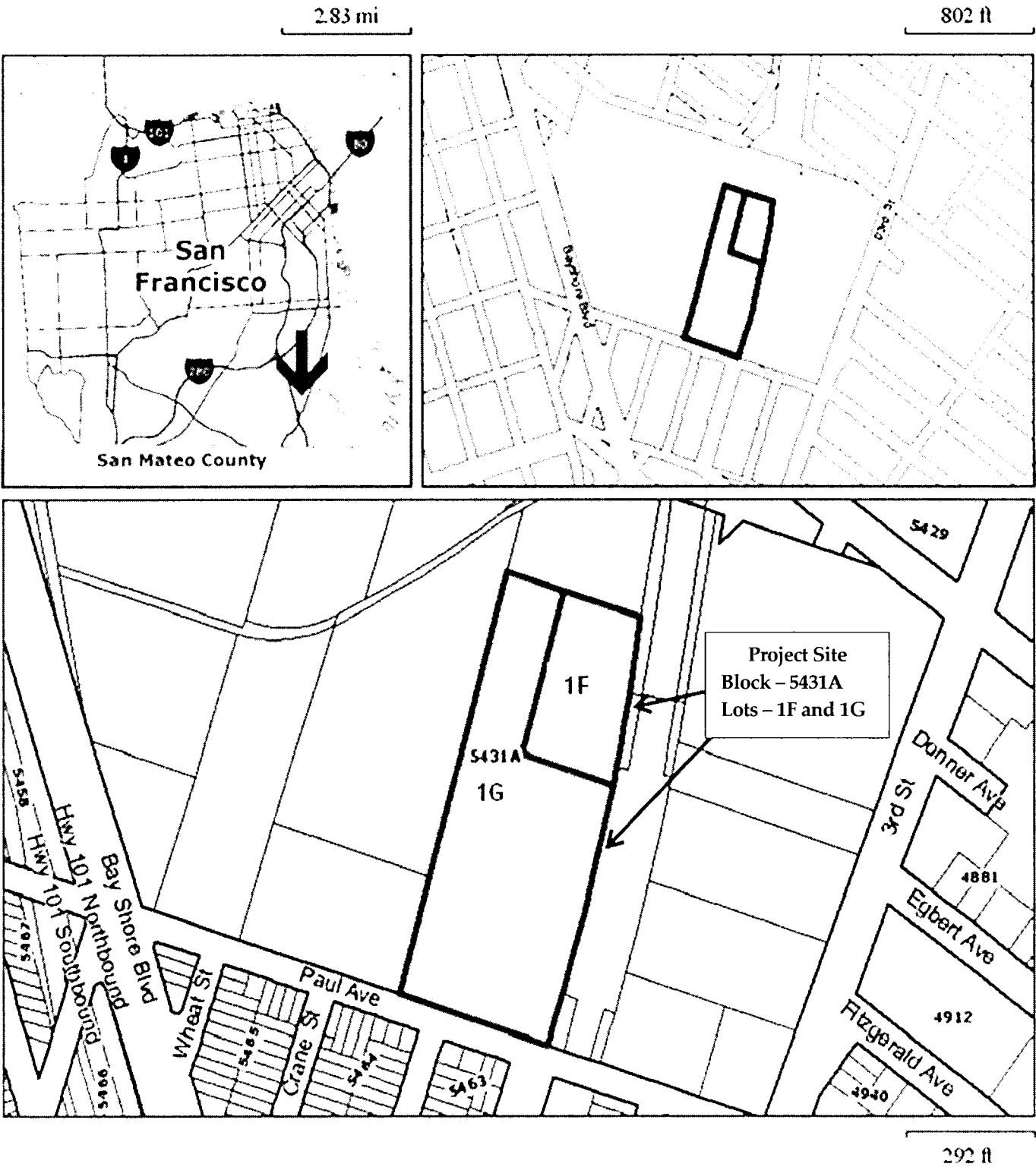


Figure 2 - Aerial Photo of Project Site



The site is in close proximity to major transit and highway routes. Both the San Francisco Municipal Transportation Agency (SFMTA) Muni Metro T Third Street light rail vehicle line and Caltrain regional rail service lines are located to the east of the project site, 500 and 0 feet respectively. The Gilman/ Paul station at the intersection of Paul and Gilman avenues is the closest station to the project site on the SFMTA's T Third light rail line. The Bayshore Caltrain Station is one mile to the southwest of the project site. Highway 101 is located 400 feet to the west with access via Bayshore Boulevard and San Bruno Avenue. The project site is within the Bayview Hunters Point Area Plan (BVHP Area Plan), formerly the South Bayshore Area Plan, and was amended in 2006 by the Bayview Hunters Point Redevelopment Projects and Rezoning amendment.<sup>3</sup> The program-level Bayview Hunters Point Redevelopment Projects and Rezoning Final Environmental Impact Report (BVHP FEIR)<sup>4</sup> was certified on March 2, 2006, and analyzed proposed rezoning and other changes to the BVHP Area Plan.

Currently, there are four buildings on the project site as shown on Figure 3 on p. 10. In the early 2000s, the project sponsor acquired the property and began operation of the ISE in the front two buildings, Buildings D and F. The project sponsor uses Buildings A and B for storage of materials and leases the remaining space to various tenants.

Presently, all four buildings are at least partially occupied. The two warehouse buildings are being used for the storage of construction materials by the project sponsor, as well as a utility meter installation contractor. There are two subcategories of uses operating within the existing ISE facility: colocation<sup>5</sup> and telco<sup>6</sup> uses. In the approximately 425,000-square-foot ISE facility (Buildings D and F), tenants providing telco services occupy approximately 55,000 square feet of building area, colocation tenants occupy approximately 212,000 square feet, and a tenant offering both colocation and telco services occupies 60,000 square feet. Additionally, approximately 38,000 square feet of building area are used for office and support functions and another approximately 60,000 square feet are leased, but not occupied.

The ISE is an energy-dependent facility due to the need for the continued operation of a large number of rooftop cooling units that maintain an acceptable temperature and humidity range for the computer equipment, and to power the computer equipment itself. The data center industry strives to meet 100 percent uptime<sup>7</sup> and any interruption to the power supply can take the computers off-line. Power is supplied to the facility by Pacific Gas and Electric (PG&E) via overhead power lines. Seventeen diesel generators are

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<sup>3</sup> Bayview Hunters Point Area Plan. Accessed on June 25, 2013. [http://www.sf-planning.org/ftp/general\\_plan/Bayview\\_Hunters\\_Point.htm](http://www.sf-planning.org/ftp/general_plan/Bayview_Hunters_Point.htm).

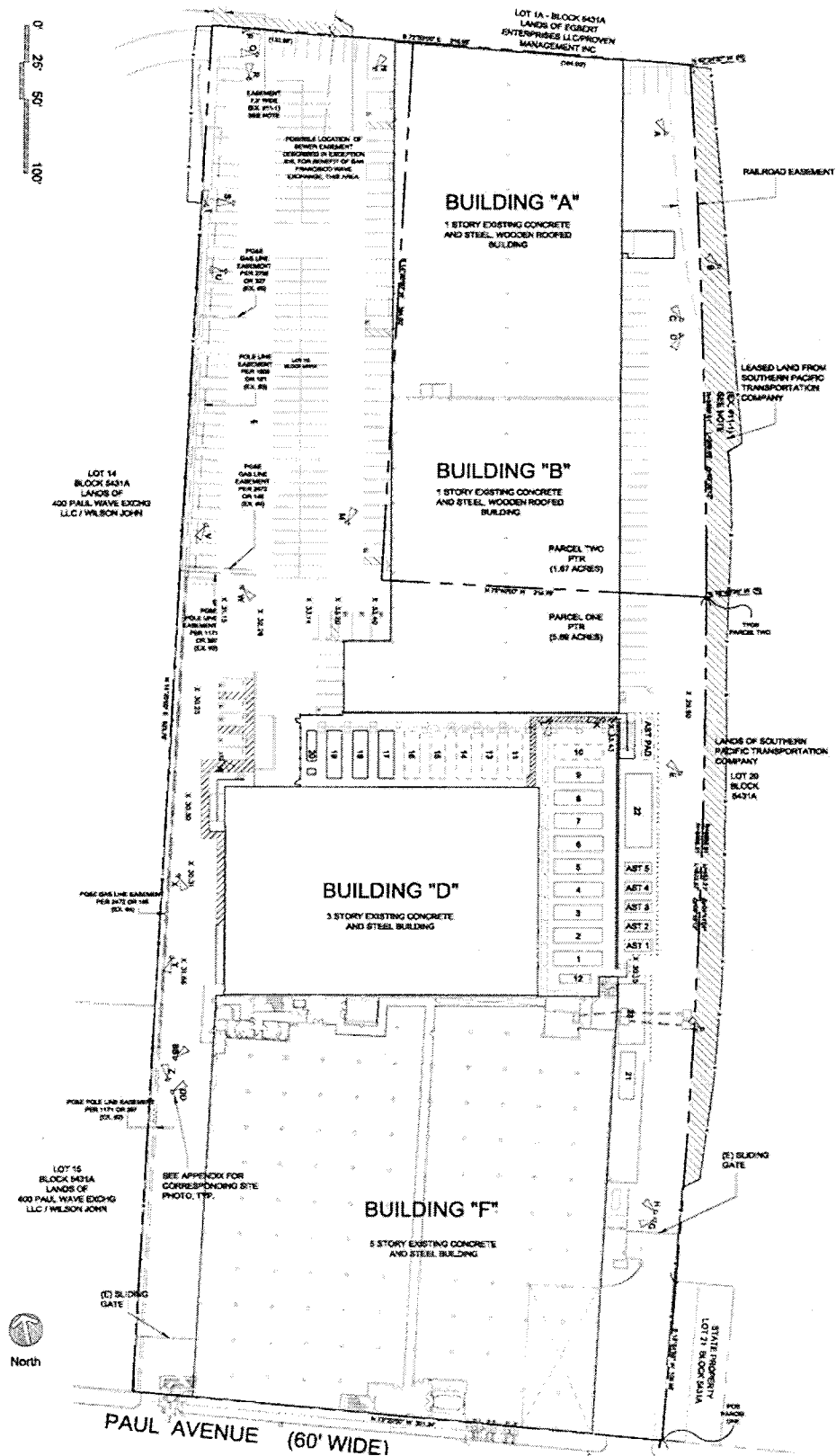
<sup>4</sup> *Bayview Hunters Point Redevelopment Projects and Rezoning Final EIR* (Case 1996.546E; State Clearinghouse No. 2003062094), certified by the San Francisco Planning Commission on March 2, 2006. This document is available for review at 1650 Mission Street, Suite 400, San Francisco, CA.

<sup>5</sup> Colocation, or data center use, is a use in which a tenant provides the mechanical cooling, backup power supply, and communications connections and leases smaller portions of its tenant space, such as racks, cabinets, and cages with multiple racks and cabinets, to colocation customers who install their own network servers and other computer hardware.

<sup>6</sup> Telco tenants provide telecommunication carrier services to support land-based telephone lines and/ or wireless phone service. Much of the leased space for telco services is used as a physical hub for the voice and data communications network and requires less energy use than a concentration of Internet computer servers, or a data center use. However, due to the telecommunication industry's growth in "voice over Internet protocol (IP) services" (VOIP), telco tenants are revising their facilities to handle VOIP services that require the use of Internet computer servers to provide an IP networking system. The transition to VOIP services requires the need for a backup power supply for the computer servers.

<sup>7</sup> Uptime refers to the state in which the computer servers are running and available for processing data.

Figure 3 - Existing Site Plan





maintained on-site to supply power to the facility during any interruptions to the PG&E power feed. These generators are located in an open service yard area located in the center of the site between the front two multi-story buildings, Buildings D and F, in which the ISE facility is operated and the two single-story warehouse buildings, Buildings A and B, located in the rear of the site.

Information on the existing buildings is provided in Table 1:

**Table 1 - Description of Existing Buildings at 200 Paul Avenue**

	Use	Year Constructed	Number of Stories	Height (feet)	Building Area (square feet)
Building A	Storage warehouse	1951	1	25	35,412
Building B	Storage warehouse	1951	1	25	33,560
Building D	Internet service exchange	2001	3	50	87,310
Building F	Internet service exchange	1955, with two additional stories added in 1963	5 plus mezzanine level	75	337,173
Note: There are no Buildings C and E on the project site.					

The maximum permitted floor area ratio<sup>8</sup> (FAR) in the Core Production, Distribution, and Repair (PDR-2) zoning district is 5.0 to 1. The area of the four buildings at 200 Paul Avenue, totaling 493,455 square feet in size, results in an 1.6 to 1 FAR and 55 percent lot coverage.<sup>9</sup>

Currently, there are 211 demarcated parking spaces on the project site. A 175-space parking lot is located on the west side of the buildings and a 36-space parking lot is located on the east side. There is no on-site vehicular access between the two parking lots and vehicles must enter each lot using the driveways off Paul Avenue. Loading is available at metal rollup doors along the south (Paul Avenue frontage), along the west and east sides of Building F. Additionally, there are several rollup loading doors along the west side and at least 10 loading doors on the east side of the two warehouse buildings (Buildings A and B). Building D has one designated loading space at the northwest corner of the building, adjacent to the existing generator service yard.

The project site does not have any separate pedestrian sidewalk or walkway from the street to any of the buildings, nor any on-site demarcated walkways connecting the buildings. Rather, pedestrians must utilize one of the two vehicular driveways from Paul Avenue to access the site and use the parking lots for internal on-site pedestrian circulation.

## Project Characteristics

The project sponsor is proposing to expand its existing ISE facility on the project site by enlarging its backup generator service yard by approximately 21,175 square feet in area to allow for the installation of 18 additional

<sup>8</sup> Floor area ratio is defined in the San Francisco Planning Code as the ratio of the gross floor area of all the buildings on a lot to the area of the lot.

<sup>9</sup> Lot coverage is the percentage of the lot area covered by buildings.

diesel backup generators as shown on Figure 4 on p.13**Error! Bookmark not defined.** The generator service yard expansion would include the construction of 12 new concrete generator pads and fuel tanks and installation of two megawatt (2 MW) diesel backup generators, as well as the installation of a new 2 MW diesel backup generator and fuel tank on each of the six existing empty generator pad areas in the existing service yard. The proposed diesel generators would be the Cummins 2000 DQKAB (or a similar model) with integrated 4,000-gallon fuel tanks (UL2085-rated, double-containment) that conform to EPA/ARB Tier 2 emission standards with ARB Level 3 Verified Diesel Emissions Control Strategy (VDECS) filtration systems and in an acoustical enclosure by ACS Manufacturing.

An approximately 16,000-square-foot portion of the 35,412-square-foot single-story warehouse, Building B, would be demolished to provide area for the generator service yard expansion and related parking lot changes as shown on Figure 5 on p. 14. A new southern building wall would be constructed at the end of the shortened warehouse using the same concrete block building materials as the existing building at the same 25-foot height as the existing building. The design of the new building elevation, as well as a cross-section showing its height in relation to the other existing buildings, is shown on Figure 6 on p. 15. No exterior changes to the northern warehouse, Building A, or the two ISE buildings, Buildings D and F, are planned. No new roof-mounted equipment, including chillers, air handlers, and other mechanical equipment, would be installed as part of this ISE expansion. After demolition of the 16,000-square-foot portion of Building B, the remaining building area would total 477,455 square feet for all four buildings. The resultant lot coverage for the entire site (both parcels) would be 39 percent and the FAR would be 1.5 to 1.

Additionally, a portion of the parking lot in the area immediately surrounding Building B and the existing generator service yard would be reconfigured to provide vehicular circulation around the expanded generator service yard. Approximately 18 existing parking spaces would be removed and replaced by up to 21 new parking spaces resulting in a potential net gain of three spaces for a total of 214 parking spaces, or one parking space per 2,230 square feet of building area. The drive aisle to serve the new parking spaces between the expanded generator service yard and the reduced Building B would also provide access between parking lots on the west and east sides of project site for emergency vehicles. All of these physical improvements would occur in the center of the site, largely screened from view from Paul Avenue by the two multi-story buildings, Buildings D and F.

The proposed ISE expansion would include the addition of 18 new diesel backup generators to serve the ISE tenants. The installation of the generators would be phased over a six-year period, 2014 to 2020,<sup>10</sup> to coincide in part with the conversion of approximately 60,000 square feet of vacant tenant space and 110,000 square feet of existing telco/ colocation power base building (PBB)<sup>11</sup> space into turn-key flex (TKF)<sup>12</sup> suites, anticipated to occur over a four-year period from 2015 through 2019. The conversion of these suites into an anticipated five TKF suites would allow the suites to be leased by both telco and colocation users. The operational characteristics of telco users are changing as land-based telephone lines are being supplanted by VOIP, which

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<sup>10</sup> The actual commencement date is dependent on the project sponsor obtaining its first site permit for the project.

<sup>11</sup> Power base building space is building area leased to a tenant by the project sponsor in which the following is provided: access to a utility power connection, fiber/copper data infrastructure, space on the roof for cooling equipment, and space in the generator service yard for diesel backup generators. The tenant installs and owns all improvements within their leased area, as well as the cooling equipment and backup generators.

<sup>12</sup> Turn-key flex space are fully developed tenant suites with a preinstalled mechanical and electrical infrastructure leased by the project sponsor to tenants who then install their own racks of computer servers and equipment.

Figure 4 - Proposed Site Plan

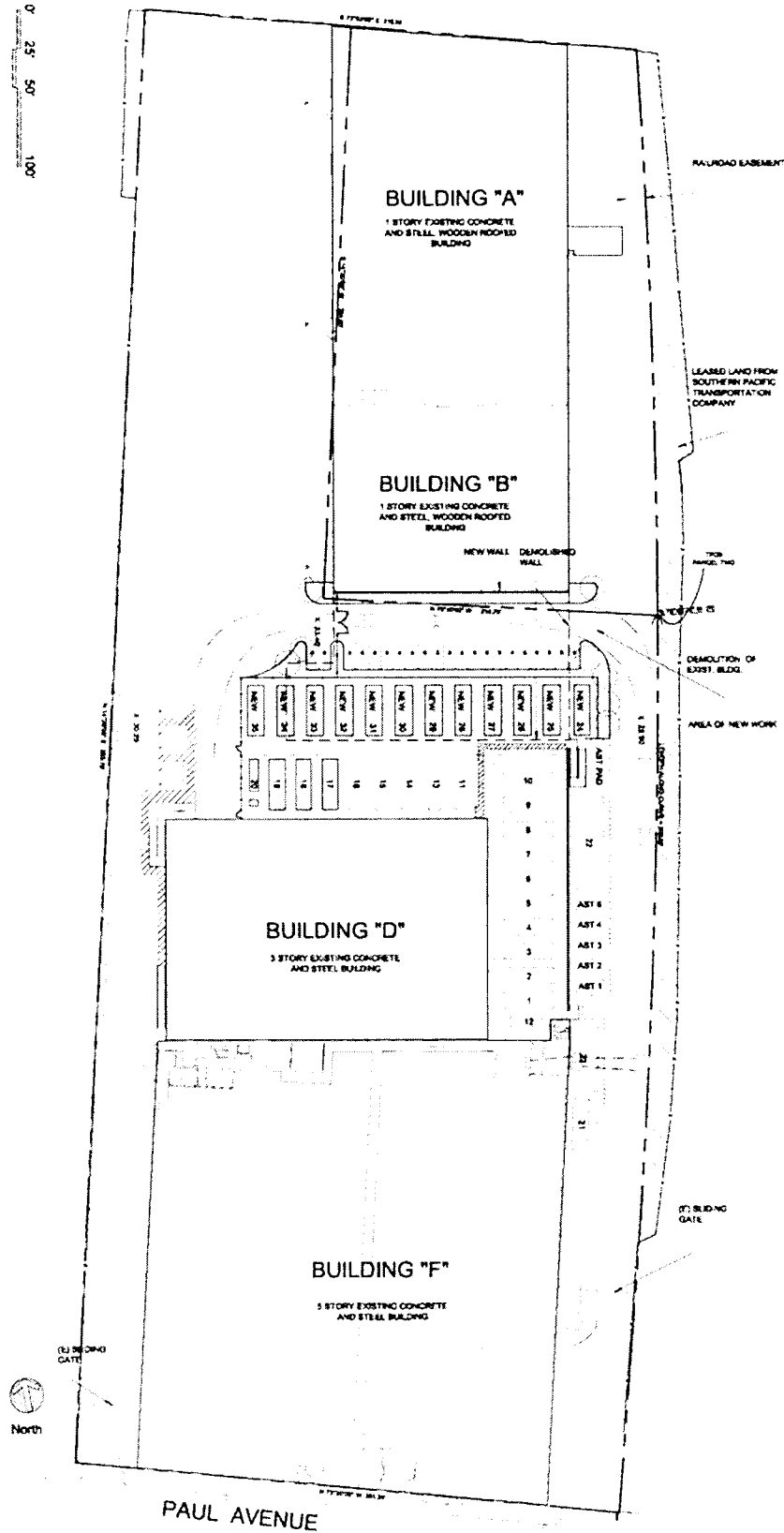
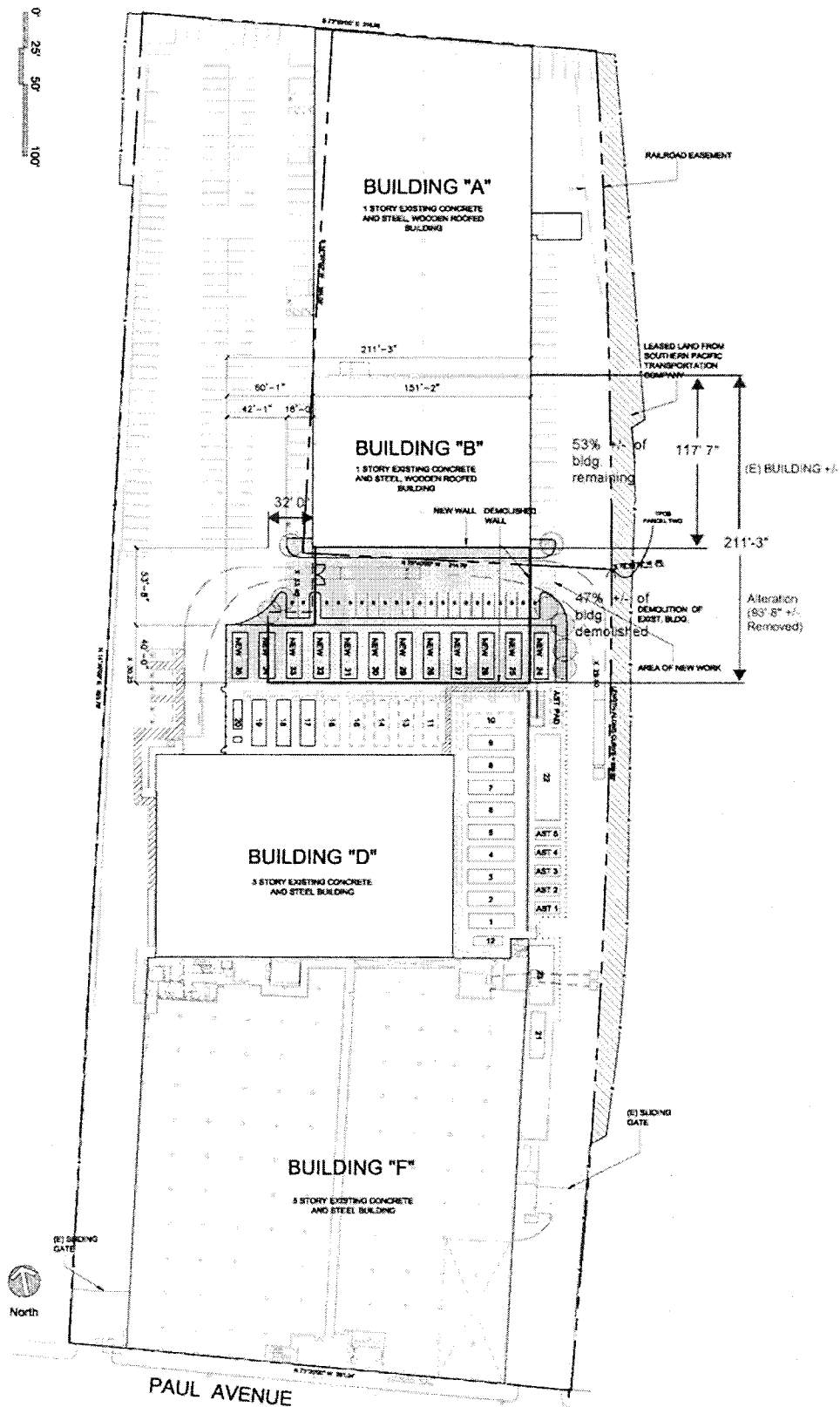


Figure 5 - Site Plan Showing Portion of Building B To Be Removed

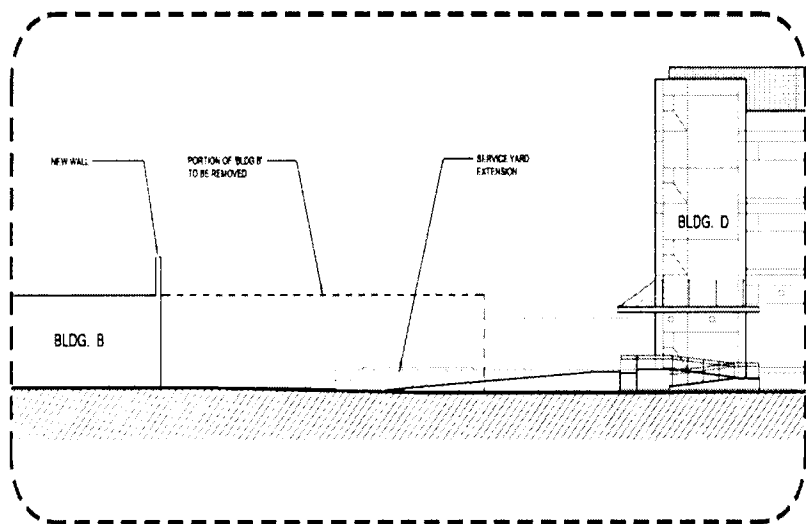


Architectural elevation drawing showing the intersection of Paul Ave. and Bldg. F. The drawing includes the following elements:

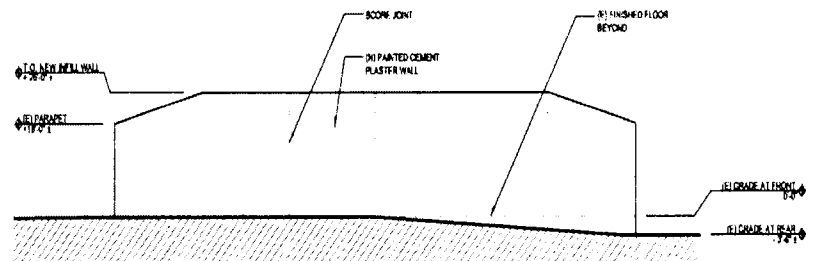
- BLDG. D**: A building structure on the left side of the intersection.
- BLDG. F**: A building structure on the right side of the intersection, featuring a flat roof and a cross-hatched section.
- PAUL AVE.**: The street running horizontally across the bottom of the drawing.
- Vertical Line**: A line indicating the intersection point.
- Right Side Elevation**: A list of floor levels and elevations:
  - MAX BLDG HEIGHT (Elev. 17.10')
  - 10th FLOOR (Elev. 16.10')
  - 9TH FLOOR (Elev. 15.10')
  - 8TH FLOOR (Elev. 14.10')
  - 7TH FLOOR (Elev. 13.10')
  - 6TH FLOOR (Elev. 12.10')
  - 5TH FLOOR (Elev. 11.10')
  - 4TH FLOOR (Elev. 10.10')
  - 3RD FLOOR (Elev. 9.10')
  - GRADE & 2ND (Elev. 8.10')
  - 2ND FLOOR (Elev. 7.10')
  - 1ST FLOOR (Elev. 6.10')
  - FIN. GRADE (Elev. 5.10')
- Notes**:
  - HEIGHT LIMIT 85.2' FROM PAUL AVE.
  - MAX. LIMIT 10' FROM PAUL AVE.

**Note:** Grade line north of Building "D" is intended as an approximation of the existing condition and is to be verified.

**Note:** Grade line north of Building "D" is intended as an approximation of the existing condition and is to be verified.



**SERVICE YARD ENLARGEMENT** (1" = 30')



NEW SOUTH WALL ELEVATION - BUILDING B (1" = 30')

similar to a colocation use, relies on an Internet server-based system. Therefore, the energy demand of the ISE would increase when the 60,000 square feet of vacant building area is occupied, and some portion of the 110,000 square feet of PBB telco and colocation space is occupied by new uses with a potentially greater Internet-server component than the existing use. Due to the energy-intensive nature of computer servers, in order to reduce overall energy consumption in the expanded ISE, the leases for the five new TKF suites would encourage the use of energy efficiency measures by tenants, including computer room air handlers, higher operating temperatures and humidity ranges, and transformer-free universal power supply.

Power effectiveness ratio (PUE) is a measure of a data center's energy efficiency. The project sponsor has only limited information on the PUE for its facility, reporting ratios of 1.45 and 1.51 for two of its tenant spaces that include 100,000 square feet of the total ISE building area. No projected change in PUE is anticipated; it would likely remain at the present PUE of 1.45 to 1.5.

There would not likely be an increase in employees generated by the conversion of telco to colocation use within the 110,000 square feet of PBB space that would be converted to TKF suites as the existing telco space already has employees working in the space to operate and maintain equipment. However, the 60,000 square feet of vacant building area is expected to be divided into two TKF suites, each with a minimum of two to four data center employees for each of three shifts (24-hour operation). Additionally, the project sponsor anticipates hiring one additional building engineer for the day shift as a result of its expansion. Therefore, there would be a maximum of 25 additional employees, or nine during the day shift, generated as a result of the ISE expansion.

As new data center tenants are secured for the building, or the needs of existing tenants change, the additional diesel backup generators would be installed approximately one year in advance of either their move-in or expansion. The anticipated diesel backup generator installation schedule is as follows: one added in 2014, three added in 2015, four added in 2016, four added in 2017, four added in 2018, one added in 2019, and the last added in 2020. Testing of the existing and proposed generators would be conducted from Monday through Friday, between 8:00 am to 5:00 pm.

The final mix of the two subcategories of ISE uses (telco/ colocation) within the expanded facility will be dependent on the tenants that lease the 60,000 square feet of vacant space and whether the 110,000 square feet of PBB space (approximately half of which is leased to tenants with some telco use) is ultimately leased by colocation or telco tenants. For purposes of environmental review, this Initial Study assumes that an additional 115,000 square feet of the ISE facility would be converted from telco to colocation use as part of the expansion.

### **Construction**

The building demolition and construction of a new southern building wall, the new concrete generator pads, and the parking and drive aisle changes would involve excavation of up to four feet below ground surface (bgs). The foundation for the new generator pads and building walls would utilize cast-in-place reinforced mat foundations and continuous spread footings, respectively. No piles or pile-driving are anticipated as part of the project construction.

No specific start date has been targeted for the project construction, though improvements are anticipated to commence in late 2013. Construction would occur in three phases: 1) demolition and excavation; 2) construction of the new building wall, concrete pads, and parking lot changes; and 3) installation of the diesel generators. In total, construction would be expected to take six months, though installation of the 18 new diesel generators would be phased over a period of six years.

Construction would occur Monday through Friday, 7:00 a.m. to 6:00 p.m. The average daily construction-related truck trips would be 15 to 20 trips, with a maximum of 25 trips during the peak construction period. Construction workers would range from 10 to 30 workers per day, with a maximum of 40. Construction workers would be required to park on-site in a designated area. Additionally, all construction equipment and materials would be accommodated on the project site.

The total cost of the construction and related improvements is estimated at \$15,600,000.

## **Project Approvals**

The proposed project would require the following approvals:

### Planning Commission

- **Conditional Use Authorization (CU Authorization)** for an expansion to an Internet service exchange use in the PDR-2 District (Planning Code Sections 303(h)(3) and 227(r)). Although the operation of the existing facility began prior to the Planning Code requirement for CU Authorization to operate an ISE, the expansion of the generator service yard is an increase in the ISE use and triggers the need to obtain CU Authorization approval for the ISE expansion. The proposed project would also require General Plan and Proposition M consistency findings per Planning Code Section 101.1.
- **Planned Unit Development (PUD)** approval for a reduction in the number of required parking spaces for the ISE use. The Planning Code does not have a specific parking ratio for ISE uses, rather the warehouse parking ratio of one parking space per 2,000 square feet of building area has been applied during the previous approval of the Building D for the ISE facility in 2000. The proposed PUD request would reduce the required parking for the ISE on the project site to 200 parking spaces, which is a ratio of one space per 2,387 square feet of building area.

### Department of Building Inspection

- **Building permits** for the demolition of a portion of Building B, the construction of a new southern building elevation, concrete generator pads, and parking and related site improvements.

### Bay Area Air Quality Management District

- A **permit** for the installation, operation, and testing of the diesel back-up generators.

## **J. PROJECT SETTING**

The project site is located on the north side of Paul Avenue midblock between Highway 101/ Bayshore Boulevard and Third Street in the Bayview/ South Bayshore neighborhood. The area topography is generally flat with a gentle downward northerly slope. The project site itself slopes northerly from Paul Avenue with an approximately 60-foot difference between the elevation of the project site's Paul Avenue frontage and the rear property line. Most of the grade change occurs within 250 feet of the site's Paul Avenue frontage, as evidenced by the sloped driveway along the project's western boundary.

The surrounding neighborhood is characterized as mixed-use with a single-family residential neighborhood to the south, major transportation routes (Highway 101 and Bayshore Boulevard) to the west, the recently revitalized mixed-use Third Street corridor to the east, and various older industrial properties to the north. The

project site is comprised of two parcels that are part of a larger industrial block, bounded by Paul Avenue, Bayshore Boulevard, Phelps Street, Williams Avenue, and Third Street. This larger industrial block is surrounded by older residential neighborhoods, though several new residential development projects in the vicinity have either been built or are approved for construction.

The development on the south side of Paul Avenue is an older established residential neighborhood with predominantly two-story residences. This residential neighborhood is a mix of single- and multi-family residences generally built in the early 1900s in the Victorian style with some in-fill/ replacement units built in the mid-1900s with a mix of architectural styles.

The north side of Paul Avenue is a mix of one- to five-story commercial/ industrial buildings. The concrete-frame self-storage facility at 500 Paul Avenue (the U-Haul facility) to the west of the project site was constructed in 1952 in the Industrial-style architectural vernacular and embellished with Colonial Revival detailing on the roof. This property operated as the Planter Peanut processing facility until it was converted to the U-Haul truck rental and self-storage facility. Immediately abutting the west side of the project site is the three-building former industrial facility located at 400 Paul Avenue, constructed in 1930 as the Link Belt Manufacturing plant, a construction equipment manufacturer. The single-story office building at the front of the site, 320 Paul Avenue, is a potential historic resource constructed in the Spanish revival style, while the other two- and three-story buildings were used for manufacturing and constructed in the early 20th century Industrial architectural style.

The approximately 125-foot-wide Caltrain right-of-way is located along the eastern edge of the project site, separating it from several two-story buildings that front onto Third Street. These buildings along the west side of Third Street, immediately east of the project site, include a 1950s church, a 1950s utilitarian telephone switching center, a 1960s fish sauce commercial facility, and a 1930s multi-tenant light industrial building complex. Along the northern edge of the project site is an outdoor storage yard currently used to store lumber and construction supplies. An old abandoned railroad spur and associated right-of-way, along with a small cluster of older post-War one- and two-story industrial buildings and a three-story, mid-Century office building are located to the northwest of the project site.

Approximately 200 feet to the north is a 1998 housing development on the north side of Egbert Avenue with the closest residence approximately 200 feet from the rear property line of the project site. This residential development contains 259 units in a mix of two- and three-story residences. Another residential development, part of a larger planned development, is located several hundred feet northeast of the project's rear property line and across the Caltrain rail tracks. Upon completion, this mixed-use development at 5800 Third Street would include four buildings with 409 residential units, 21,000 square feet of ground-floor retail space, and a senior center. In 2010, the first phase of that project, which included two four- and five-story stucco buildings, was completed and contained 137 residential units and a 21,000-square-foot ground-floor retail space, occupied by the Fresh and Easy grocery store.

The Caltrain regional rail line abuts the project site to the east with the San Francisco Municipal Transportation Agency (SFMTA)'s Muni Metro T Third Street light rail line located to the east of the project site, 550 feet further east of the project site. The closest transit stop on the SFMTA's T Third Street light rail line is the Gilman/ Paul stop at the intersection of Paul Avenue and Gilman Street. Although the Caltrain right-of-way adjoins the entire eastern edge of the project site, the nearest station, Bayshore, is one mile to the southwest of the project site. The use of a former Caltrain stop at Paul Avenue was discontinued in 2005 due to



low ridership. The SFMTA's Route 29 Sunset provides bus service along the property's Paul Avenue frontage. Other SFMTA routes near the project site include two on San Bruno Avenue, the Route 8X Bayshore and the Route 9 San Bruno. The Route 91 Owl on Third Street provides nighttime bus service. Major vehicular access to this area is provided by Highway 101, Bayshore Boulevard and San Bruno Avenue, all located approximately 750 feet to the west of the project site, and Third Street, located approximately 550 feet to the east.

The residential neighborhood to the south of the project site, on the south side of Paul Avenue, is zoned RH-1 (House, One-family) and is in the 40-X height and bulk district. The properties immediately to the east and west of the site are in the same PDR-2 zoning district and 65-J height and bulk district as the project site. To the north of the site, the narrow 20-foot wide former railroad spur is zoned M-1 (Light Industrial) and is in the 65-J height and bulk district. On the north side of the railroad spur and south of Egbert Avenue, most of the properties are zoned PDR-2, with the exception of the San Francisco Housing Authority office building at 1815 Egbert Avenue which is zoned P (Public). All of these properties are within the 65-J height and bulk district. The residential neighborhood on the north side of Egbert Avenue is zoned RH-1 and is in the 65-J height and bulk district. The new mixed-use project at 5800 Third Avenue, on the east side of the Caltrain tracks, is designated M-1 and is in the 40-X height and bulk district.

## K. COMPATIBILITY WITH EXISTING ZONING AND PLANS

	<i>Applicable</i>	<i>Not Applicable</i>
Discuss any variances, special authorizations, or changes proposed to the Planning Code or Zoning Map, if applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### San Francisco Planning Code

The San Francisco Planning Code (Planning Code), which incorporates by reference the City's Zoning Maps, governs permitted uses, densities, and configuration of buildings within San Francisco. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless the proposed project conforms to the Planning Code, an exception is granted pursuant to provisions of the Planning Code, or a reclassification of the site occurs.

**Use.** The proposed project includes the demolition of an approximately 16,000-square-foot portion of one of the four existing buildings, Building B, on the project site in order to provide sufficient area for the expansion of the existing generator service yard for the data center at 200 Paul Avenue. The San Francisco Planning Code categorizes data centers as an ISE use. The project site is in the PDR-2 zoning district that requires the project sponsor to apply for and receive CU Authorization in order to expand the ISE use. The ISE use was

established as a conditional use in part to address Citywide energy consumption by these facilities and compatibility with the surrounding land uses (Planning Code Section 227(r)).

**Parking Requirements.** The project sponsor has applied for PUD approval to reduce the minimum required parking ratio for the ISE on the project site to 200 spaces, which is approximately one parking space per 2,387 square feet of building area, due to the unique operating characteristics of ISE facilities. Approval of the current ISE facility site plan in 2000 required 248 parking spaces be provided on-site based on the warehouse use parking ratio of one space per 2000 square feet of building area. Approval of the PUD would reduce the overall parking requirements from 239 to 200 spaces.

### **Approvals and Permits from City Departments Other than the Planning Department and Department of Building Inspection and Other Agencies**

The project sponsor would need to obtain the necessary permits from the Bay Area Air Quality Management District (BAAQMD) prior to the installation of the diesel backup generators.

### **Plans and Policies**

**San Francisco General Plan Priority Planning Policies.** The San Francisco General Plan (General Plan), which provides general policies and objectives to guide land use decisions, contains some policies that relate to physical environmental issues. The compatibility of the project with General Plan policies that do not relate to physical environmental issues will be considered by decision-makers as part of their decision whether to approve or disapprove the proposed project and any potential conflicts identified as part of that process would not alter the physical environmental effects of the proposed project.

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the City's Planning Code to establish eight Priority Policies. These policies, and the sections of this Environmental Evaluation addressing the environmental issues associated with the policies, are: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character (Question 1c, Land Use); (3) preservation and enhancement of affordable housing (Question 3b, Population and Housing, with regard to housing supply and displacement issues); (4) discouragement of commuter automobiles (Questions 5a, b, f, and g, Transportation and Circulation); (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership (Question 1c, Land Use); (6) maximization of earthquake preparedness (Questions 13 a-d, Geology, Soils, and Seismicity); (7) landmark and historic building preservation (Question 4a, Cultural Resources); and (8) protection of open space (Questions 8 a and b, Wind and Shadow, and Questions 9a and c, Recreation and Public Space). Prior to issuing a permit for any project which requires an Initial Study under CEQA, and prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action which requires a finding of consistency with the General Plan, the City is required to find that the proposed project or legislation is consistent with the Priority Policies. As noted above, the consistency of the proposed project with the environmental topics associated with the Priority Policies is discussed in Section E, the Evaluation of Environmental Effects, of this Initial Study.

**Bayview Hunters Point Area Plan.** The project site is within the Bayview Hunters Point Area Plan in the South Basin activity node in an area designated for core PDR activities.

## L. SUMMARY OF ENVIRONMENTAL EFFECTS

The proposed project could potentially affect the environmental factor(s) checked below. The topic areas that are checked are those in which impacts that could potentially be significant unless mitigated are identified in Section E, Evaluation of Environmental Effects. The following pages present a more detailed checklist and discussion of each environmental factor.

- |                                                                   |                                                        |                                                                        |
|-------------------------------------------------------------------|--------------------------------------------------------|------------------------------------------------------------------------|
| <input type="checkbox"/> Land Use                                 | <input checked="" type="checkbox"/> Air Quality        | <input type="checkbox"/> Biological Resources                          |
| <input type="checkbox"/> Aesthetics                               | <input type="checkbox"/> Greenhouse Gas Emissions      | <input type="checkbox"/> Geology and Soils                             |
| <input type="checkbox"/> Population and Housing                   | <input type="checkbox"/> Wind and Shadow               | <input type="checkbox"/> Hydrology and Water Quality                   |
| <input checked="" type="checkbox"/> Cultural and Paleo. Resources | <input type="checkbox"/> Recreation                    | <input type="checkbox"/> Hazards/Hazardous Materials                   |
| <input type="checkbox"/> Transportation and Circulation           | <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Mineral/Energy Resources                      |
| <input checked="" type="checkbox"/> Noise                         | <input type="checkbox"/> Public Services               | <input type="checkbox"/> Agricultural and Forest Resources             |
|                                                                   |                                                        | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

All items on the Initial Study Checklist that have been checked "Less Than Significant Impact," "No Impact," or "Not Applicable" indicate that, upon evaluation, staff has determined that the proposed project could not have a significant adverse environmental effect relating to that issue. For items that have been checked "Less Than Significant with Mitigation Incorporated," staff has determined that the proposed project would not have a significant adverse environmental effect provided that the project sponsor implements mitigation measures presented in Section F of this document. A discussion is included for most issues checked "Less Than Significant with Mitigation Incorporated," "Less Than Significant Impact," "No Impact," or "Not Applicable." For all of the items without discussion, the conclusions regarding potential significant adverse environmental effects are based upon field observation, staff experience and expertise on similar projects, and/or standard reference material available within the Department, such as the Department's Transportation Impact Analysis Guidelines for Environmental Review, or the California Natural Diversity Data Base and maps, published by the California Department of Fish and Wildlife. For each checklist item, the evaluation has considered the impacts of the project both individually and cumulatively.

### Cumulative Projects

Two approaches to a cumulative impact analysis are provided in CEQA Guidelines Section 15130(b)(1). The analysis can be based on (a) a list of past, present, and probable future projects producing 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. The analysis in this Initial Study employs both list-based and projections approaches, depending on which approach best suits the individual resource topic being analyzed. For instance, the aesthetics analysis considers individual projects that are anticipated within a quarter-mile of the project site that may alter the visual character and views in and surrounding the project area, while the transportation and circulation analysis relies on the larger BVHP Area Plan growth projection model that encompasses the project site and projects within the buildout timeframe of the Area Plan, which is the typical methodology that the San Francisco Planning Department applies to analysis of transportation impacts. Table 2 presents a list of projects approved or anticipated to be approved in the near future within one quarter-mile of the project site. These reasonably foreseeable probable future projects are considered in the cumulative

analysis, as applicable. The location of these projects in relationship to the project site is shown on Figure 7 on p. 23.

**Table 2 - Cumulative Projects within a Quarter-mile of the Project Site**

Project Name	Timeframe/Description
<b>Approved Projects</b>	
5800 Third Street	Construction of a second phase to an existing commercial and residential mixed-use project that would include building an additional 271 multi-family dwelling units in two buildings, along with a 15,000-square-foot senior center. <sup>13</sup> Construction is anticipated to begin in the summer of 2013 and have an 18-month duration. The site is in the Light Industrial (M-1) Zoning District and 65-J Height and Bulk District. The project is located a minimum of 125 feet from the project site.
2895 San Bruno Avenue	Construction of a new mixed-use development consisting of five four-story buildings, totaling 14,500 square feet in area. <sup>14</sup> The buildings would contain 10 dwelling units, ground-floor retail spaces, and limited second floor business or professional service uses in the Small-Scale Neighborhood Commercial (NC-2) Zoning District and a 40-X Height and Bulk District. This project is located in a residential neighborhood in the Excelsior District and is separated from the project site by Highway 101 and Bayshore Boulevard. The project is located a minimum of 1,200 feet from the project site.
<b>Foreseeable Projects (Not Yet Approved)</b>	
400 Paul Avenue Data Center	Construction of an 183,560-square-foot Internet services exchange on the property adjoining the west side of the project site. <sup>15</sup> Environmental review of the project is currently underway. The project would include the demolition of two existing industrial buildings and the construction of a 171,000-square-foot data center and renovation of a 12,560-square-foot historic office building along the front of the property. Eighteen diesel backup generators would be installed as an emergency power supply for the facility. A total of 80 parking spaces and three loading docks would be provided on-site. The project adjoins the entire western edge of the project site.

<sup>13</sup> San Francisco Planning Department Case No. 2003.0672E.

<sup>14</sup> San Francisco Planning Department Case No. 2010.0627E.

<sup>15</sup> San Francisco Planning Department Case No. 2012.0152E.

Figure 7 - Cumulative Projects



## M. EVALUATION OF ENVIRONMENTAL EFFECTS

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>E.1. Land Use and Land Use Planning</b>					
Would the project:					
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial impact upon the existing character of the vicinity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Impact LU-1: The proposed project would not physically divide an existing community or have a substantial impact upon the existing character of the vicinity. (Less than Significant)**

Land use impacts are considered significant if they disrupt or divide the physical arrangement of an established community. The proposed changes to the ISE facility would be made in the center of the project site and would not involve any changes to the established street network. Because all the changes would be made within the existing lot configuration, the proposed project would not physically divide or interfere with the physical arrangement of existing uses and activities that surround the project site or impede the passage of persons or vehicles. The proposed project would not impede the passage of persons or vehicles or substantially interfere with traffic and pedestrian circulation. Therefore, the proposed project would not physically divide the existing community.

**Impact LU-2: The proposed project would be inconsistent with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. (Less than Significant with Mitigation)**

Land use impacts are considered to be significant if the proposed project would conflict with any plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Environmental plans and policies are those, like the BAAQMD's 2010 Clean Air Plan, which directly address environmental issues and/or contain targets or standards, which must be met in order to preserve or improve characteristics of the City's physical environment. The project sponsor would obtain permits from BAAQMD for the operation of the proposed 18 diesel generators in conformance with its regulations adopted to avoid environmental impacts related to air quality. See Topic E.7, Air Quality, for a discussion of compliance with BAAQMD regulations.

As discussed in Topic E.6., Noise on p.46, the noise levels produced by the proposed diesel backup generators would exceed those allowed by the San Francisco Noise Ordinance for industrial properties along the project

site's western and eastern property lines. Implementation of **Mitigation Measure M-NO-1, Attenuation of Noise from Outdoor Equipment**, on p. 117 would reduce the project's noise impact to a less-than-significant level. The site's eastern property line abuts the 125-foot-wide Caltrain right-of-way and active rail line. In order to understand its potential impacts on land uses on the east side of the rail line, the cumulative noise increase was reviewed against the General Plan land use compatibility standards for various ambient noise levels. Therefore, upon implementation of this mitigation measure the proposed project would not obviously or substantially conflict with any such adopted environmental plan or policy, including the General Plan policies that relate to physical environmental issues. Therefore, with incorporation of mitigation measures, the proposed project would have a less-than-significant impact with mitigation regard to consistency with existing plans, policies, and regulations.

**Impact LU-3: The proposed project would not have a substantial impact upon the existing character of the vicinity. (Less than Significant)**

Land uses in the vicinity of the site are dominated by single-family residential uses on the south side of Paul Avenue and commercial and industrial uses on the north side of Paul Avenue, immediately surrounding the project site. This block is designated for light industrial uses in both the BVHP Area Plan and the City's zoning map. The project site is part of a larger block, bounded by Highway 101, Paul Avenue, Third Street, and Egbert Street, developed in the 1920s as an industrial area with a variety of manufacturing uses. Different warehouse buildings have occupied the site since that time and have been used by a number of manufacturing and distribution uses, such as the former Macys furniture warehouse, repair, and distribution facility. The residential neighborhood to the south of the property was established at about the same time, the early 1900s, as the first manufacturing facility on the project site.

An existing ISE facility operates on the project site. Two multi-story structures located along the project site's Paul Avenue frontage are occupied by ISE tenants with a focus in the data center and telecommunications sectors. The ISE tenants have rooms full of computing and telecommunication switching equipment with network operators on site performing routine maintenance and available for troubleshooting. The two single-story warehouses at the rear of the site are used for storage by both the project sponsor and several non-ISE-related tenants. The project would involve the demolition of a portion of one of those buildings to provide area for the expansion of the existing generator service yard to allow for the installation of 18 additional diesel backup generators to serve existing and future tenants, including those expected to lease the approximately 60,000 square feet of vacant building area in the ISE.

Generally, visitors to the ISE are limited to data center employees as the facility is not open to the general public. The project involves an expansion of an existing use and would not introduce a new land use to the area. Surrounding uses would be expected to continue in operation and to relate to each other as they do presently, without disruption from the proposed project. Therefore, the proposed project would not have a significant impact on existing land uses and the existing character of the surrounding area. And the proposed project's impact on the existing character of the project's vicinity would be less than significant.

**Impact C-LU-1: The proposed project, in combination with past, present and reasonably foreseeable future projects in the vicinity of the site, would result in a cumulatively considerable contribution to a significant cumulative land use impact. (Less than Significant with Mitigation)**

As shown in Table 2 on page 22 there are three approved projects and reasonable foreseeable future projects within a quarter-mile radius of the project site. These projects would be regulated by, and are anticipated to be consistent with, the BVHP Area Plan and Planning Code provisions.

The noise impact of the proposed project would be significant and would not comply with the regulations adopted for the purpose of avoiding or mitigating an environmental effect (noise). The noise generated by the project would combine with that generated by the proposed Internet Service Exchange project at 400 Paul Avenue. Noise attenuates (lessens) with distance and the proposed generators on the 400 Paul Avenue project site are planned for the center of the property minimizing overlap between the two sources. Noise generated by that future project would be required to adhere to the Noise Ordinance and would therefore, not result in a significant impact at its shared property line (western property line of 200 Paul) with the 200 Paul Avenue project where the project noise levels result in a significant impact. Therefore, the noise generated by the proposed project at 200 Paul Avenue would have a cumulatively considerable contribution to the cumulative significant land use impact (noise) at its western property line resulting from its own significant project-generated noise impact. However, with implementation of **Mitigation Measure M-NO-4: Noise Attenuation of Outdoor Equipment** the project's significant impact is reduced to less than significant. Therefore, with implementation of the project mitigation measures, the project would not result in any significant cumulative land use impacts.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>E.2. Aesthetics</b>					
Would the project:					
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment which contribute to a scenic public setting?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

A visual quality/aesthetics analysis is somewhat subjective and considers the project design in relation to the surrounding visual character, heights and building types of surrounding uses, its potential to obstruct scenic views or vistas, and its potential for light and glare. The design of the proposed project's changes to Building B



and the expansion of the existing generator service yard would be considered to have a significant adverse environmental effect on visual quality only if it would cause a substantial and demonstrable negative change.

**Impact AE-1: The proposed project would not have a substantial adverse effect on a scenic vista. (Less than Significant)**

A project would have a significant effect on scenic vistas if it would substantially degrade important public view corridors or obstruct scenic views from public areas viewable by a substantial number of people. View corridors are defined by physical elements such as buildings and structures that direct lines of sight and control view directions available to the public.

The Urban Design Element of the City's General Plan contains policies focused on the preservation of major views throughout the City. Policy 1.1 of the Urban Design Element is intended to recognize and protect major views in the City, with particular attention to those of open space and water. Significant views are broadly identified in the Urban Design Element as those of open space, the Bay, the Bay Bridge and Golden Gate Bridge, and architecturally and historically important buildings. Scenic views and vistas are limited in the project vicinity due to surrounding urban development and intervening buildings.

The project site is in a low-lying area of the City characterized by mid-rise buildings. There are no public scenic vistas in the area that would be substantially affected by the proposed project. Views from surrounding sidewalks and street corridors consist primarily of surrounding urban development. The existing building along the project's Paul Avenue frontage would be retained and all changes would be made in the center of the site.

The only public park and open space near the project site is the Bay View Playground at the northeast corner of Third Street and Carroll Avenue, approximately two blocks northeast of the project site. The project site is not visible from any outdoor areas in the park due to intervening buildings. As such, the proposed project would not degrade or obstruct any scenic views or vistas now observed from a public park or open space area.

Impacts on private views generally are not considered a significant impact pursuant to CEQA. Given the location of the changes at the center of the site and the downhill slope from the street, these changes would have very limited visibility from the residential development on the south side of Paul Avenue and therefore would not be substantial.

For the above reasons, the proposed project would have a less-than-significant impact on any publicly accessible scenic vistas in the project area.

**Impact AE-2: The proposed project would not substantially damage any scenic resources. (No Impact)**

Scenic resources are the visible physical features of a landscape (e.g., land, water, vegetation, animals, structures, or other features). Scenic resources of the built environment may include City landmarks that would be identified along a tour route, including, but not limited to, Coit Tower and the Golden Gate Bridge. There are no scenic resources, either natural or manmade on the project site, therefore the proposed project would not have any impact on scenic resources.

**Impact AE-3: The proposed project would not degrade the visual character or quality of the site and its surroundings. (Less than Significant)**

The visual character of the project site and vicinity is urban with a diversity of building types, sizes, and ages. Land uses in the surrounding neighborhood are mixed, and include residential, commercial, and industrial. Properties on the north side of Paul Avenue are commercial and industrial facilities with larger building sizes and utilitarian architectural styles resulting in an industrial streetscape character. The properties on the south side of Paul Avenue are residential structures in a variety of period residential styles with street orientation characteristic of an older urban residential neighborhood. Design and aesthetics are by definition subjective and open to interpretation by decision-makers and members of the public. A proposed project would have a significant adverse effect on visual quality under CEQA only if it would cause a substantial and demonstrable negative change. The proposed project would not have such a change.

The generator service yard has limited visibility from off-site locations. The project would include the demolition of a portion of a single-story warehouse building and its replacement with an expansion to the existing generator service yard, along with minor parking lot improvements. The mounted height of the new generators would be approximately the same height as the 25-foot height of the adjacent single-story warehouse buildings and less than the 72-foot-height of the front five-story building. **Mitigation Measure M-NO-1: Attenuation of Noise from Outdoor Equipment** as identified on p. 117 would require the construction of an approximately 27-foot-high sound attenuation wall along the west side and a portion of the north side of the expanded generator service yard. This wall would extend between the approximately 50-foot high Building D to within 45 feet of the 25-foot high Building B. Therefore, the new structures would not exceed the height of the existing buildings and would be set back the same distance from the property line as the existing buildings. These proposed changes to the project site would be indistinguishable in mid- and long-range views and would visually blend into the urban mix of residential and commercial land uses and surrounding development in the area. Due to the location of the improvements at the center of the site, changes to street-level views from vantage points along Paul Avenue and Egbert Street would be very minor. These physical changes would be consistent with the surrounding urban character of the project vicinity and would not degrade existing views.

For all of the above reasons, the proposed project would not result in a substantial and demonstrable negative change, or disrupt the existing visual character of the project vicinity.

**Impact AE-4: The proposed project would not create a new source of light and glare, but not to an extent that would adversely affect day or nighttime views in the area or which would substantially impact other people or properties. (No Impact)**

No new building-mounted or free-standing lighting or window glazing would be installed as part of the project. Therefore, the project would not have any impact associated with light and glare.

**Impact C-AE-1: The proposed project, in combination with past, present, and reasonably foreseeable future development in the vicinity, would not have a cumulatively considerable contribution to a significant cumulative impact on aesthetic resources. (Less than Significant)**

There are several approved projects and reasonably foreseeable future projects within the project vicinity, as identified in Table 2 on p. 22. Similar to the proposed project, the approved and reasonable foreseeable projects would be contemporary in architectural design and would conform to the applicable land use designations, design requirements, and Height and Bulk District requirements as outlined in the City's Planning Code.

An application to replace two older industrial buildings with a new utilitarian-style data center building on the adjacent property at 400 Paul Avenue is currently being reviewed. The project and planned changes on the adjacent 400 Paul Avenue site would result in the progression of physical changes to the older early 20<sup>th</sup>-century industrial buildings in the immediate area to more utilitarian-looking structures characterized by noticeable outdoor service yards and equipment. The project would contribute in the cumulative evolution of this industrial block to an area of updated utilitarian structures with noticeable on-site activities. Though the older buildings may change incrementally to more updated utilitarian structures as a result of these cumulative projects, the character of the area would remain industrial in nature and these changes would not substantially degrade views, damage scenic resources, or degrade the existing visual character of the area.

The project vicinity is highly urbanized and lacks unique scenic resources. Therefore, cumulative development in the project vicinity would not adversely affect visual resources to such a degree that a significant cumulative impact would occur in combination with the proposed project's less-than-significant aesthetic impacts. Further, even if these projects did result in aesthetic impacts, the proposed improvements would be virtually indistinguishable from public view points and would not contribute in a cumulatively considerable way to the degradation of views or visual character, or damage to scenic resources.

For the reasons discussed above, the proposed project's impacts related to aesthetics, both individually and cumulatively, would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>E.3. Population and Housing</b>					
Would the project:					
a) Induce substantial 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

The proposed expansion of the existing ISE facility would not be expected to trigger demand for a substantial increase in residential dwelling units. There would be an anticipated increase of approximately 8 employees per shift (3 daily shifts), and 1 building engineer during the day shift, for a total of 25 additional employees, as a result of the occupancy of the vacant 60,000 square feet of ISE space. This could result in the potential

demand of up to 25 new housing units. This would be consistent with the population and housing growth anticipated in the BVHP Area Plan, and evaluated in the BVHP FEIR<sup>16</sup>, that assumed existing sites would be altered by new or expanded uses. The additional demand of up to 25 housing units generated by the project would be a small portion of the additional 3,700 new housing units projected in the BHP Area Plan to be constructed within the Plan Area.

The project does not include any housing units. The project site is located in an urbanized area and the proposed improvements would not substantially alter existing development patterns in the Bayview/ South Bayshore neighborhood, nor would it be expected to induce a substantial amount of growth. In view of the above, the proposed project would not induce substantial growth or displace substantial numbers of people or housing units and would therefore not have a significant adverse effect on population and housing. Therefore, the proposed project would have a less-than-significant impact on inducing substantial population growth, either directly or indirectly.

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

The project site does not have any existing residential uses, nor would the project displace any businesses. Therefore, the proposed project would have no impact with respect to the displacement of existing people, housing, or necessitating the construction of replacement housing elsewhere.

**Impact C-PH-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not have a cumulatively considerable contribution to a significant cumulative impact on population and housing. (No Impact)**

The BVHP FEIR found that there would be a cumulative increase in population and the demand for housing within the BVHP Area Plan. An additional 5,523 additional employees were anticipated to be added to the Bayview Hunters Point Redevelopment Area through 2025.<sup>17</sup> The BVHP FEIR found that while the housing demand generated by the future jobs may exceed the affordable housing provided in the Plan Area, it was not a significant adverse impact and the project included an Affordable Housing Program to address this need. The BVHP FEIR found that the number of non-affordable housing units provided in the Plan Area would exceed the demand for residential units generated by the additional jobs in the Plan Area.

The proposed project is within the BVHP Area Plan but, as described above, the project's increase of 25 employees would have an-insignificant impact on population growth and housing demand. Because the proposed project would result in an insignificant increase in population growth and the cumulative population growth from the aforementioned projects would be within the City's anticipated growth in the BVHP Area Plan, the proposed project would not have a cumulatively considerable contribution to any significant cumulative impact to population and housing.

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<sup>16</sup> Bayview Hunters Point Redevelopment Projects and Rezoning Final EIR, 2006.

<sup>17</sup> Bayview Hunters Point Redevelopment Projects and Rezoning Final EIR, 2006.

**Topics:**

**E.4. Cultural and Paleontological Resources**

Would the project:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Impact CP-1: The proposed project would not result in a substantial adverse change in the significance of historic architectural resources. (No Impact)**

Historical resources are those properties that meet the terms of the definitions in Section 21084.1 of the CEQA Statute and Section 15064.5 of the CEQA Guidelines. "Historical Resources" include properties listed in, or formally determined eligible for listing in, the California Register of Historical Resources (California Register), or listed in an adopted local historic register. The term "local historic register" or "local register of historical resources" refers to a list of resources that are officially designated or recognized as historically significant by a local government pursuant to resolution or ordinance. Historical resources also include resources identified as significant in a historical resource survey meeting certain criteria. Additionally, properties that are not listed, but are otherwise determined to be historically significant based on substantial evidence, would also be considered a historical resource.

A historic resource evaluation response (HRER) was prepared for the proposed project by Planning Department staff in response to an evaluation prepared by Tim Kelley Consulting<sup>18</sup> to determine whether the existing warehouse building that would be altered (Building B) is a historic resource and whether the proposed project would have any adverse effect on historic resources on the project site, or within the project vicinity.<sup>19</sup> The following is a summary of the HRER.

<sup>18</sup> Tim Kelley Consulting, LLC, *Historic Resource Evaluation*, 200 Paul Avenue, San Francisco, CA, August 2012. This document is available for public review at the Planning Department at 1650 Mission Street, Suite 400, San Francisco, CA 94103, as part of Case No. 2012.0153E.

<sup>19</sup> San Francisco Planning Department, *Historic Resource Evaluation Response*, 200 Paul Avenue, February 4, 2013. This document is available for public review at the Planning Department at 1650 Mission Street, Suite 400, San Francisco, CA 94103, as part of Case No. 2012.0153E.

## Site History

The four existing buildings on the project site were constructed between 1951 and 2000. The front five-story industrial building, Building F, constructed of reinforced concrete in a utilitarian architectural style, was built in 1955 by Macys for use in its furniture warehouse, distribution, and repair and distribution facility. In 2000, two smaller buildings constructed by Macys in the 1950s were demolished and replaced with the three-story utilitarian Building D for use with the conversion of the site to an ISE facility. At the rear of the property are two long, rectangular, one-story warehouse buildings, Buildings A and B, constructed in 1951 using concrete block and a wood bow truss roof system.

The project site has had a progression of uses since the initial structures were built in the early 1920s. Generally, each use altered or replaced the on-site structures to meet its particular needs, resulting in a series of building demolitions from the 1920s until the last demolition in 2000. Except for the one structure built in 2000, the other three existing buildings date to the use of the site, initiated in 1952, by Macys for its furniture repair and distribution facility.

**Buildings A and B.** Buildings A (northern) and B (southern) are conjoined to each other but are not attached to Buildings F or D. Together Buildings A and B form a long rectangular, one-story structure. The concrete block buildings sit on a concrete foundation and are utilitarian in style, with no architectural detailing or ornament. The exterior walls have unfinished concrete block surfaces and the buildings are capped by shallow bow-truss roofs pierced by skylights and surrounded by parapets. A parapet spans the center of the structure and constitutes the only visible division between the two buildings. A small ell<sup>20</sup> is located at the southwest corner of Building B, projecting to the west, and the parapet is higher on the south side of the ell.

The western building facade along Buildings A and B contains a series of metal roll-up loading doors. This elevation faces the adjacent western parking lot that provides vehicular access to the loading doors. Two doors, including one located on the western façade of the southwest ell, are located on Building B, while three are located on Building A. There is no fenestration along the western building wall and the rooflines terminate in flat parapets. At the far end of this façade, a narrow section of the parapet is higher than the rest and wraps the corner of the building. The northern elevation of Building A has a series of vehicular and service entrances that are sheltered by a wood-framed, corrugated metal awning. The eastern building wall of Buildings A and B abuts a paved driveway. There are numerous metal roll-up loading doors along this building elevation with entrances of varying sizes with the largest openings toward the center. This building elevation is a parapet wall with the bow truss roof visible behind it. The southern building façade also includes a series of additional service entrances and is topped by an unadorned parapet.

## Historic Resource Eligibility

The determination of whether a building may be a historical resource is associated with California Register of Historical Resources (California Register) criteria, which include events (Criterion 1), persons (Criterion 2), architecture (Criterion 3), and information potential (Criterion 4), or if it is determined to contribute to a historic district or context.

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<sup>20</sup> An ell is an extension to a building, usually at right angles to the main part

The HRER found that the four buildings on the project site were not associated with events or people that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States (Criteria 1 and 2). The buildings were deemed to be examples of mid- to late-20<sup>th</sup> century, concrete, utilitarian industrial buildings, which are common in the Bayview District. They do not stand out as noteworthy cases of types, periods, or methods of construction. The buildings are characterized by concrete construction, with forms and features that are influenced purely by the function of the buildings and the activities taking place within them. They have no artistic architectural merit, and do not contain any unusual or exemplary features or structural elements that make them significant examples of utilitarian industrial design. Their functional and utilitarian characteristics are demonstrated by countless other properties of similar age throughout the industrial districts of San Francisco. The original building permits for the age-eligible buildings on the property were not available and, therefore, no architects, builders, or engineers are known. Based on the lack of architectural merit and the fact that no designers are known, it does not appear that any of the buildings at 200 Paul Avenue are eligible for listing in the California Register under Criterion 3. Also, the property at 200 Paul Avenue was not determined to be eligible under Criterion 3 as it did not embody any notable characteristics which distinguish the building as historically significant either individually or as part of a historic district. The property was not found to have the potential to yield important history or prehistory information (Criterion 4). Therefore, the buildings at 200 Paul Avenue were determined not to be eligible for listing in the California Register, nor were they part of a historic district, and therefore, are not historic resources for purposes of CEQA. Therefore, demolition of a portion of Building B would not have an impact on a historic architectural resource or district.

**Impact CP-2: The proposed project could result in damage to, or destruction of, as-yet unknown archaeological remains should such remains exist beneath the project site. (Less than Significant with Mitigation)**

CEQA requires that the effects of a project on an archeological resource shall be taken into consideration and that if a project may affect an archeological resource that it shall first be determined if the archeological resource is an "historical resource," that is, if the archeological resource meets the criteria for listing in the California Register. To be eligible for listing to the California Register under Criteria 1, 2, or 3, an archeological site must contain artifact assemblages, features, or stratigraphic relationships associated with important events, or important persons, or be exemplary of a type, period, or method of construction (*CEQA Guidelines* § 15064.5(a)(1) and (3) and (c)(1) and (2)). To be eligible under Criterion 4, an archeological site need only show the *potential* to yield important information<sup>21</sup>. An archeological resource that qualifies as a "historical resource" under CEQA, generally, qualifies for listing under Criterion 4 of the California Register (*CEQA Guidelines* §15064.5 (a)(3)(D)). An archeological resource may qualify for listing under Criterion 4 when it can be demonstrated that the resource has the potential to significantly contribute to questions of scientific/historical importance. The research value of an archeological resource can only be evaluated within the context of the

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<sup>21</sup> United States Department of the Interior, National Park Service. "National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation." Washington, D.C.: National Park Service, revised 1998. Available online at <http://www.nps.gov/nr/publications/bulletins/nrb15/>. Accessed on July 17, 2013.

historical background of the site of the resource and within the context of prior archeological research related to the property type represented by the archeological resource.<sup>22</sup>

Factors considered in determining the potential for encountering archaeological resources include the location, depth, and amount of excavation proposed, as well as any existing information about known resources in the area. The proposed project would involve an anticipated excavation depth of up to four feet for the new building wall (southern wall of Building B) foundation and the construction of the generator service yard improvements. The 27-foot-high sound attenuation wall required by **Mitigation Measure M-NO-1: Attenuation of Noise from Outdoor Equipment** on p. 117 may require the use of pier footings, though they would be poured in place rather than pile-driven. While the exact depth of these footings would not be known until engineering plans are completed for the sound attenuation wall, they would likely require an excavation depth greater than four feet bgs.

In a memorandum dated May 17, 2013,<sup>23</sup> the Planning Department staff completed its preliminary archeological assessment, summarized as follows:

There is an indication that a limited area of the project site is covered with up to several feet of imported fill material. It is unclear how much of the the project site has been altered during the historic period and the existing grade is likely near the historic site surface. The historic land surface below the fill is a composite of sandy silt or clayey sand. The presence of sandy silt, clayey sand and clay deposits within shallow depths below the surface indicate that this area may have at one time been within tidal wetlands at a time that the South Basin extended further inland. The dense sand deposits extend up to 15 feet bgs at some locations on the site, indicative of the Colma Formation, a Pleistocene alluvial deposit that forms a cultural basement for archeologists who do not expect prehistoric deposits deeper than 3 to 5 feet within this formation. Although the Colma Formation formed long before human presence has been documented in the San Francisco Bay Area and the Americas, it provided a stable land surface available for human occupation for thousands of years even until the Early Holocene when human communities are well documented

The area from Hunter's Point to Candlestick Point and extending inland to wetlands within Visitación Valley is one of San Francisco's areas of high prehistoric sensitivity. These prehistoric deposits are shell middens but it is highly probable that other types of prehistoric deposits are also present. Compared to prehistoric sites in the South of Market area, these prehistoric sites, some of which are documented from the mid-1850s, have been the subject of far less field study, particularly using modern methodologies. Most of these shell midden sites are located near the former shoreline, lagoons, or marshlands. The project site is located between two former streams that run into the embayment that today is only residually represented by South Basin. The two locations for CA-SFR-10 and the Thomas-Hawes mound are the documented prehistoric midden sites nearest to the project site.

The preliminary archeological assessment determined that there is a reasonable potential that archeological resources may be present within the project site as the project is within an area that has a high degree of archeological sensitivity for prehistoric deposits. Implementation of the following mitigation measure is

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<sup>22</sup> California Office of Historic Preservation, "Preservation Planning Bulletin No. 5". This document is available for public review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2012.0153E.

<sup>23</sup> Memorandum from Randall Dean, San Francisco Planning Department to Heidi Kline, San Francisco Planning Department, May 17, 2013. This document is available for public review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case No. 2012.0153E.



required to avoid any potential adverse effect from the proposed project on any archeological resources and when implemented by the project sponsor would reduce potential archeological impacts to a less-than-significant level.

#### **Mitigation Measure M-CP-2: Archaeological Testing Plan**

Based on a reasonable presumption that archeological resources may be present within the project area, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried archeological resources. The project sponsor shall retain the services of an archaeological consultant from the rotational Department Qualified Archaeological Consultants List (QACL) maintained by the Planning Department archaeologist. The project sponsor shall contact the Department archaeologist to obtain the names and contact information for the next three archeological consultants on the QACL. 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 (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, 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).

**Consultation with Descendant Communities.** On discovery of an archeological site an appropriate representative of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to consult with ERO 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 Final Archeological Resources Report shall be provided to the representative of the descendant group.

**Archeological Testing Plan.** The archeological consultant shall prepare and submit to the ERO for review and approval an archeological testing plan (ATP). The archeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, the testing method to be used, and the locations recommended for testing. The purpose of the archeological testing program will be to determine to the extent possible the presence or absence of archeological resources and to identify and to evaluate whether any archeological resource encountered on the site constitutes an historical resource under CEQA.

At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the ERO. If based on the archeological testing program the archeological consultant finds that significant archeological resources may be present, the ERO in consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or an archeological data recovery program. If the ERO determines

that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

- A) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or
- B) A data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

**Archeological Monitoring Program.** If the ERO in consultation with the archeological consultant determines that an archeological monitoring program shall be implemented the archeological monitoring program shall minimally include the following provisions:

- The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils- disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the risk these activities pose to potential archeological resources and to their depositional context;
- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;
- The archeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;
- The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archeological monitor has cause to believe that the pile driving activity may affect an archeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO.

Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO.

**Archeological Data Recovery Program.** The archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The archeological

consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will 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 ADRP 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.
- **Interpretive Program.** Consideration of an on-site/off-site public interpretive program during the course of the archeological data recovery program.
- **Security Measures.** Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally 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.

**Final Archeological Resources Report.** The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO 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. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound, one unbound and one unlocked, searchable PDF copy on CD of the FARR along with copies of 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. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

**Impact CP-3: The proposed project could indirectly destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant with Mitigation)**

Paleontological resources, or fossils, are the remains, imprints, or traces of once-living organisms preserved in rocks and sediments. Paleontological resources include vertebrate, invertebrate, and plant fossils or the trace or imprint of such fossils. The fossil record is the only evidence that life on earth has existed for more than 3.6 billion years. Fossils are considered nonrenewable resources because the organisms from which they derive no longer exist. Thus, once destroyed, a fossil can never be replaced. Paleontological resources are lithologically dependent; that is, deposition and preservation of paleontological resources are related to the lithologic unit in which they occur. If the rock types representing a deposition environment conducive to deposition and preservation of fossils are not favorable, fossils will not be present. Lithological units that may be fossiliferous include sedimentary and volcanic formations.

Areas of the project site are covered with several feet of imported fill material. The historic land surface below the fill is a composite of sandy silt or clayey sand. The presence of sandy silt, clayey sand and clay deposits within shallow depths below the surface indicate that this area may have at one time been within tidal wetlands at a time that the South Basin extended further inland. Rock formations were not encountered in any of the five borings, with a maximum 21-foot depth, completed on the project site in 1999<sup>24</sup> or the four borings, with a maximum 22-foot depth, completed in 2013.<sup>25</sup>

The proposed excavation, as discussed in the Project Description and in Impact CP-2, would generally extend up to four feet in depth though may involve excavation to greater depths for the sound attenuation wall. While it is unlikely that the depth of excavation would reach a depth that would encounter geologic rock formations containing lithological units (containing fossils), in the abundance of caution, this Initial Study considers the project's impact on paleontological resources to be significant. Implementation of **Mitigation Measure M-CP-2, Archeological Testing Plan** would mitigate any impact on the resource to a less-than-significant level.

**Impact CP-4: The proposed project may disturb human remains. (Less than Significant with Mitigation)**

Impacts on Native American burials are considered under Public Resources Code (PRC) Section 15064.5(d)(1). When an Initial Study identifies the existence of, or the probable likelihood of, Native American human remains within the project site, the lead agency is required to work with the appropriate tribal entity, as identified by the California Native American Heritage Commission (NAHC). The lead agency may develop an agreement with the appropriate tribal entity for testing or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials. By implementing such an agreement, the project becomes exempt from the general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5) and the requirements of CEQA pertaining to Native American human remains. The proposed project's treatment of human remains and of associated or unassociated funerary objects discovered during any soils-disturbing activity would comply with applicable state laws, including immediate notification of the City and County of

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<sup>24</sup> Kleinfelder, Inc., *Geotechnical Investigation Proposed Emergency Generator and Fuel Tank Yard at 200 Paul Avenue, San Francisco, California*, March 2, 1999. This document is available for review at 1650 Mission Street, Suite 400, San Francisco, California.

<sup>25</sup> Kleinfelder, Inc., *Geotechnical Investigation Equipment Yard Improvements 200 Paul Avenue, San Francisco, California*, June 17, 2013. This document is available for review at 1650 Mission Street, Suite 400, San Francisco, California.

San Francisco Coroner. If the Coroner were to determine that the remains are Native American, the NAHC would be notified and would appoint a Most Likely Descendant (PRC Section 5097.98).

Previous development at the project site has resulted in substantial ground-disturbing activities. Therefore, if human remains were present at the project site, it is likely that they were previously disturbed. As such, the proposed project is not anticipated to disturb any human remains, including Native American burials. Nonetheless, in an abundance of caution, this Initial Study considers the project's impact on human remains to be significant. Implementation of **Mitigation Measure M-CP-2, Archeological Testing Plan**, would reduce this impact to a less-than-significant level.

**Impact C-CP-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the site, would have a cumulatively considerable contribution to a significant cumulative cultural resources impact. (Less than Significant with Mitigation)**

There are several approved projects and reasonably foreseeable future projects within the project vicinity, as identified in Table 2 on p. 22. Although some cumulative projects in the area could result in significant and unavoidable cumulative impacts to historical resources, such as the BVHP Area Plan, implementation of the proposed project would not contribute considerably to any cumulative to any impact on historical resources. The proposed project would not adversely impact any historic resource as the none are present on the project site and the site is not part of a larger historic district, or resource. Impacts on off-site historic resources would be reviewed and evaluated as part of any future development. Therefore, this project would not have any impacts to historic architectural resources and the proposed project would not contribute to the cumulative impacts to historic architectural resources in the BVHP Area Plan.

However, ground-disturbing activities in the vicinity of the project site could encounter previously recorded and/or unrecorded archaeological and paleontological resources as well as human remains. The proposed project, in combination with past, present, and reasonably foreseeable projects in the vicinity that also involve ground disturbance and could also encounter previously recorded and unrecorded archaeological resources and/or human remains, could result in a significant cumulative impact to these cultural resources.

Project-related impacts on archaeological and paleontological resources and human remains are site-specific and generally limited to the project's construction area. Nonetheless, in an abundance of caution, this Initial Study considers the project's impact on cumulative cultural resources to be significant. Implementation of **Mitigation Measure M-CP-2: Archeological Testing Plan** would reduce the proposed project's impacts to a less-than-significant level, and the proposed project's contribution to cumulative impacts on archaeological and paleontological resources and/or human remains would also be less than significant with implementation of this measure.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>E.5. Transportation and Circulation</b>					
Would the project:					
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The project site is not located within an airport land use plan area, or in the vicinity of a private airstrip. Therefore, topic E.5c is not applicable.

### Setting

The project site is located within the Bayview/ South Bayshore neighborhood midblock on Paul Avenue between Highway 101/ Bayshore Boulevard and Third Street, on the block bounded by San Bruno Avenue, Egbert Street, Third Street, and Paul Avenue. The project site has frontage on its south side along Paul Avenue. The proposed project includes demolition of an approximately 16,000-square-foot portion of an existing warehouse to provide area to expand an existing generator service yard and install an additional 18 diesel

backup generators to facilitate the expansion of an existing ISE facility. Changes would be made to the existing parking lot immediately adjoining the existing generator service yard, resulting in a net gain of three parking spaces, as well as a new drive aisle connecting the eastern and western parking lot areas for use by emergency vehicles. In addition, the proposed project includes the future occupancy of approximately 60,000 square feet of currently vacant building area (estimated to include two TKF tenants) by colocation and telco users as a result of the expansion. No changes would be made to the entrance driveways, sidewalk, and on-street parking along the project site's Paul Avenue frontage.

**Regional Access.** Regional access to the project site is provided by Highway 101 Interstate 80 (I-80), and Interstate 280 (I-280). Both I-80 and I-280 connect to Highway 101 north of the project site. Highway 101 provides the primary regional access to the project site. Highway 101 provides access to the San Francisco-Oakland Bay Bridge which connects San Francisco with the East Bay and other destinations to the east. Highway 101 also provides access to areas to the south of the project site, including the Silicon Valley and the South Bay. Highway 101 connects San Francisco and the North Bay via the Golden Gate Bridge. Within the northern part of San Francisco, Highway 101 operates on surface streets (i.e., Van Ness Avenue and Lombard Street). Access to the project site from Highway 101 from the northbound direction is via the Third Street off ramp and from the southbound direction is via the Paul Avenue off-ramp. Access to both directions on Highway 101 from the site is via the Bayshore Boulevard on-ramps.

**Local Access.** Paul Avenue is a two-way arterial that runs in an east-west direction between Third Street and San Bruno Avenue. The street has two travel lanes, one in each direction, and a parking lane on both sides of the street. Paul Avenue has driveways on the north side for the individual industrial uses and, on its south side, connections to local residential neighborhood streets. In the San Francisco General Plan, Paul Avenue does not have any special designation or characterization on the Vehicular Street Map, Congestion Management Plan (CMP) Network Plan, or the Metropolitan Transportation System Street and Highway Network Plan.

Rather, Paul Avenue is a relatively short arterial connecting two major arterials, Bayshore Boulevard and Third Street. Both Bayshore Boulevard and Third Street are designated as major arterial streets on the General Plan Vehicular Map (Map 6 of the General Plan Transportation Element) and CMP Plan (Map 7 of the General Plan Transportation Element). These major arterials are intended to function as cross-town thoroughfares whose primary function is to link districts within the city and to distribute traffic from and to the freeways.

**Bicycle Access.** Bicycle Route 5, a Class III bike route, follows Paul Avenue from San Bruno Avenue to Third Street, and then, along the length of Third Street to the Islais Creek bridge. Route 5 also connects to Route 25 that travels along Bayshore Boulevard.

**Public Transit.** The SFMTA's Muni T Third Street light rail line and Caltrain regional rail line are located to the east of the project site, 550 and 0 feet respectively. The closest transit stops on the SFMTA's T Third Street light rail line is the Gilman/ Paul stop at the intersection of Paul Avenue and Gilman Street. Although the Caltrain right-of-way adjoins the entire eastern edge of the project site, the nearest station, Bayshore, is 1.0 mile to the southwest of the project site. A previous stop at Paul Avenue was terminated in 2005 due to low ridership. The SFMTA's Route 29 Sunset provides bus service along the property's Paul Avenue frontage. Other SFMTA routes near the project site include two rapid network routes, the Route 8X Bayshore at San Bruno Avenue and the Route 9 San Bruno at San Bruno Avenue. Nighttime bus service is provided by the Route 91 Owl on Third Street.

**Impact TR-1: The proposed project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, nor would the proposed project conflict with an applicable congestion management program. (Less than Significant)**

Policy 10.4 of the Transportation Element of the San Francisco General Plan states that the City will “[c]onsider the transportation system performance measurements in all decisions for projects that affect the transportation system.” To determine whether the proposed project would conflict with a transportation- or circulation-related plan, ordinance, or policy, this section analyzes the proposed project’s effects on intersection operations, transit demand, pedestrian and bicycle circulation, parking, and freight loading, as well as construction impacts.

### **Trip Generation**

The City of San Francisco October 2002 Transportation Impact Analysis Guidelines (San Francisco Guidelines) and the Institute of Traffic Engineers (ITE) Trip Generation 8<sup>th</sup> Edition do not have any data on the trip generation rates for data center uses. The use is different from an office use in that large areas of the building house racks of computing hardware with only a few employees present around the clock to monitor the equipment and a sporadic influx of additional workers to install and replace the equipment, along with building security, maintenance, and administrative personnel. Additionally, unlike typical trip patterns generated by office uses, data center trip arrival and departure times are spread out over three shifts, most which occur outside the PM peak period, and operate seven days a week. Much of the installation, repair and maintenance in a data center takes place in the evening hours after 10:00 PM when Internet usage drops significantly. The project sponsor estimates that an additional two to four employees per TKF suite could be expected to be employed at the facility. If the additional 60,000 square feet of building area is leased to two TKF tenants, a maximum of eight additional employees per shift, along with an additional building engineer during the day shift, would be added, or a total of 25 additional employees. Therefore, nine employees could be expected to travel to the facility during the AM and PM peak hour periods. The facility is not open to the general public. Therefore, visitors to the facility would be limited to sporadic events, such as visits by potential tenants and construction personnel.

Based on the employee travel mode rates in the San Francisco Guidelines for this area of the City (Superdistrict 3), during the daytime shift six employees would arrive by auto (in five autos due to ridesharing), two would arrive on transit, and one would be expected to walk or bike. The mode split and number of employees are shown in the following Table 3 on p.42. Due to the potential overlaps between shifts, these figures are doubled.

**Table 3 - Travel Mode for Employees to the Site**

<b>Trips to Project Site</b>	<b>Auto</b>	<b>Transit</b>	<b>Walk</b>	<b>Other</b>	<b>Persons per Auto</b>
<b>Mode Split</b>	71.1 percent	20.2 percent	5.8 percent	2.0 percent	1.23
<b>No. of Employees (Per Shift)</b>	6	2	1	0	-
<b>No. of Employees (Shift Overlap)</b>	12	4	2	0	-



## **Traffic**

Intersection analysis in San Francisco is generally conducted for the PM peak hour. Based on the projected number of employees, mode split, and persons per auto, a maximum total of 10 vehicle trips (5 leaving and 5 arriving) would be added to traffic volumes at adjacent intersections. Due to this minor increase in trips as compared to traffic volumes at the adjacent intersections on Paul Avenue at Third Street, Bayshore Boulevard, and San Bruno Avenue, the project would have a negligible impact on intersection levels of service in the project vicinity.

## **Parking**

The existing ISE facility currently has 211 on-site parking spaces. Potentially, three additional parking spaces would be added in the center of the site as part of a reconfiguration of 18 existing spaces in the area immediately surrounding the generator service yard. Therefore, the project would result in a total of 214 on-site parking spaces. Paul Avenue along the project site's frontage has on-street parking on the north side of the street. Based on observations by Environmental Planning staff and the project sponsor over the past 12 months, the parking lot at the project site is never fully occupied. Rather, approximately half of the parking spaces are occupied at any given time.

The project would result in a demand for five additional parking spaces for the projected nine additional employees during the maximum shift (day shift) based on the employee travel mode rates in the San Francisco Guidelines for this area of the City (Superdistrict 3). Sufficient on-site parking would be available for the additional project-generated demand as a result of the construction of the three additional parking spaces and the existing unused on-site parking spaces.

The Planning Code does not include a parking standard for data center uses. During the building permit review process for the 87,000-square-foot Building D in 2000, the warehouse parking standard of one space per 2,000 square feet was used to evaluate parking demand, projecting a demand for 247 spaces for the site. However, the ISE parking lot was striped for 211 parking spaces, rather than 247 spaces to meet the projected demand of one space per 2,000 square feet of building area. As mentioned above, the 211-space parking lot has proved sufficient to meet the parking demand of the ISE facility. Therefore, the project sponsor has submitted its request for PUD approval to reduce the required parking for the ISE facility to 200 parking spaces in order to bring the project into compliance with the Planning Code.

As described above, parking for the five additional vehicles could be accommodated on-site and the proposed project's impacts on on-site and off-site parking would be less than significant.

## **Loading**

There are approximately 17 freight loading spaces on the project site. Building F has two along the south elevation, three on the east elevation, and two on the west elevation, and Building D has one. Buildings A and B have a total of approximately 10 rollup doors along both the western and eastern building elevations of adequate dimensions to accommodate truck loading doors. The loading space at the rear of Building D would not be eliminated as the generator service yard would be expanded in the northerly direction, rather than the westerly direction. Several loading doors to Building B would be removed during the demolition. However, other loading doors would be available on the western and eastern building elevations to serve Building B.

The ISE facility is not a delivery-intensive use. Rather, most deliveries occur during construction projects within the suites, i.e. installation of equipment for a new user. The usual business service deliveries, such as

UPS and Fedex, would also be anticipated to occur at the facility. The Planning Code requires two loading spaces for uses with 200,000 to 500,000 square feet of office and other similar uses. Upon demolition of the 16,000-square-foot portion of Building B, the proposed ISE facility would continue to comply with the minimum Planning Code required loading spaces. The planned delivery activities would continue to be accommodated by the existing freight loading facilities. Therefore, implementation of the proposed project would have a less-than-significant impact on loading at the ISE facility.

### **Transit**

Based on the employee mode split in the SF Transportation Guidelines for this area, two of the nine additional employees during the daytime shift are projected to utilize public transit. These new transit trips would utilize the nearby MUNI lines and regional transit lines, and may include transfers to other MUNI bus and light rail lines, or other regional transit providers. The addition of the two project-generated riders, or four during shift changes, would have a negligible impact on the AM or PM peak hour capacity utilization of the MUNI bus and light rail lines operating in the vicinity of the proposed project. Therefore, the project would have a less-than-significant impact on the performance and safety of public transit facilities.

### **Pedestrian and Bicycles**

Based on the travel mode split for employees in this area, one employee would walk or bike to work. Existing sidewalks along Paul Avenue and surrounding streets are available for use by the employees. An existing bicycle route is located on Paul Avenue. Therefore, implementation of the proposed project would have a less-than-significant impact on pedestrian, bicycle, and transit.

### **Construction**

Construction activities would last 6 months and would be completed in three phases. The number of construction workers would range from 10 to 30 workers per day, with a maximum of 40. Construction material staging and storage and parking for construction workers are anticipated to occur on the project site. Construction would occur Monday through Friday, 7:00 a.m. to 6:00 p.m. The average daily construction-related truck trips would be 15 to 20 trips, with a maximum of 25 daily trips during the peak construction period. No specific construction-related truck routing is anticipated.

During this period, temporary and intermittent transportation impacts would result in additional vehicle trips to the project site from workers, material hauling, and equipment deliveries, these activities would be limited in duration. These potential conflicts could also have temporary and intermittent conflicts with other components of the transportation system (e.g., transit, pedestrian, bicycle). Given the temporary and intermittent nature of the construction activities, the proposed project's construction-related activities would not result in a substantial impact to transportation. Therefore, the construction of the proposed project would have a less-than-significant impact on transportation-related infrastructure and area circulation.

### **Impact TR-2: The proposed project would not substantially increase hazards due to a design feature or incompatible uses. (No Impact)**

The proposed project would not alter the entrance driveways, public sidewalk, or street configuration in any way. Additionally the project is a minor expansion of an existing use that is consistent with both the BVHP Area Plan and Planning Code, as described in Section E.1, Land Use and Land Use. Therefore, the proposed project would not have any impacts that would cause a hazard due to a design feature or incompatible use.

**Impact TR-3: The proposed project would not result in inadequate emergency access. (Less than Significant)**

Emergency access to the project site would remain unchanged from existing conditions. Emergency service providers would continue to be able to pull onto the project site from Paul Avenue. The new drive aisle connecting the western and eastern parking areas would improve emergency access to the generator service yard and on-site buildings. The installation of the 18 additional diesel generators would be reviewed by the San Francisco Fire Department (Fire Department) plan check personnel to ensure compliance with the San Francisco Fire Code and other applicable regulations governing emergency vehicle access to the new generators prior to the issuance of a building permit, along with undergoing all required Fire Department inspections prior to commencement of the operation of the generators. Therefore, the proposed project would have a less-than-significant impact on emergency vehicle access.

**Impact C-TR-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the site, would not have a cumulatively considerable contribution to a significant cumulative transportation impact. (Less than Significant)**

**Construction**

It is anticipated that project-related construction activities may overlap with the construction activities of other projects in the area, notably the proposed expansion of the adjacent data center at 400 Paul Avenue and the residential project at 5800 Third Street. The construction activities associated with these nearby projects would have a negligible impact on traffic, bicycle and pedestrian movements along Paul Avenue.

Given the limited duration (6 months) and extent of project-related construction activities, particularly in the context of the other projects that would occur in the area, the project would not result in a cumulatively considerable contribution to construction impacts that could affect access, traffic and transit operations, and pedestrian/bicycle movements. The proposed project would result in a less-than-significant cumulative impact.

**Operation**

The BVHP EIR assessed cumulative traffic conditions for future projects within the Plan Area, such as the proposed project and the adjacent data center planned at 400 Paul Avenue using the San Francisco County Transportation Authority (SFCTA) countywide travel demand forecasting model to develop future year 2025 cumulative traffic volumes at the study intersections and transit ridership projections.<sup>26</sup> The SFCTA model output takes into account both the future development expected in the Plan Area, as well as the expected growth in housing and employment for the remainder of San Francisco and the nine-county Bay Area.

In 2025 cumulative conditions in the BVHP Area Plan, vehicle delays would increase to an unacceptable level of service (LOS F) at only one study intersection, Third and Cesar Chavez Streets, with mitigation infeasible. All other study intersections within the Plan Area would continue to operate at acceptable levels of service (D or better), though some require implementation of mitigation measures. The closest study intersection was Bayshore Boulevard at Paul Avenue that required a timing change be implemented to the left turn movement to improve the LOS from F to D in the Cumulative 2025 conditions. The US 101 freeway in the northbound direction south of I-280 was also shown to deteriorate from LOS E to F with no feasible mitigation. For the

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<sup>26</sup> *Bayview Hunters Point Redevelopment Projects and Rezoning Final EIR, 2006*

Cesar Chavez and Third streets intersection and Highway 101 that would operate at LOS E or LOS F under 2025 cumulative conditions with the BVHP project, the proposed project's trip contribution to 2025 cumulative traffic volumes at these locations would represent a less than cumulatively considerable contribution to the LOS F operating conditions and, therefore, cumulative traffic impacts at the study intersections would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>E.6. Noise</b>					
Would the project:					
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Be substantially affected by existing noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The project site is not located within an airport land use plan area or within 2 miles of an airport; nor is it within the vicinity of a private airstrip. Therefore, the proposed project would not expose people residing or working in the area to excessive airport or airstrip noise. As such, topics E.6.e and E.6.f are not applicable and are not discussed further in this section.

Noise is measured in decibels (dB) which indicates the relative amplitude of a sound. A-weighted sound level, or dBA, is a method for characterizing sound that gives greater weight to frequencies of sound to which the human ear is more sensitive. Because sound levels vary markedly over a short period of time, a method for describing the average character of the sound or the statistical behavior of the variations, must be employed. Since the sensitivity to noise increases at night and because excessive noise interferes with the ability to sleep, a 24-hour descriptor has been developed,  $L_{dn}$ , that gives weight to noise events occurring during this more noise-sensitive period. The thresholds for speech interference indoors are about 45 dBA if the noise is steady and above 55 dBA if the noise is fluctuating. Outdoors the thresholds are about 15 dBA higher. Steady noise of sufficient intensity; above 35 dBA, and fluctuating noise levels above 45 dBA have been shown to affect sleep. Interior noise limits for residential uses are set by Title 24 of the Uniform Building Code and San Francisco Noise Ordinance (Article 29 of the Police Code). Typical wood frame construction techniques with open windows reduces exterior noise by about 15 dBA. Therefore, speech and sleep interference is possible when exterior noise levels are 60 dBA and greater.

The Environmental Protection Element in the San Francisco General Plan includes the following Figure 8, Land Use Compatibility Chart for Community Noise for assessing land use compatibility with various noise environments. Land use compatibility is evaluated using  $L_{dn}$  noise levels to account for a longer-term descriptor of noise with a penalty prescribed to nighttime noise due to its increased potential for sleep disturbance that is a key factor in land use noise conflicts. The proposed data center use would fit within the category of Commercial – Wholesale and some retail, Industrial/ Manufacturing, Transportation, Communications, and Utilities and is not considered a noise-sensitive facility.

Ambient noise levels in the vicinity of the project site are typical of noise levels in San Francisco, which are dominated by vehicular traffic noise, including trucks, cars, Muni buses, emergency vehicles, noise from land use activities, periodic temporary construction-related noise from nearby development, and street maintenance noise. Long-term noise monitoring was conducted in representative locations around the site from September 12 to 14, 2012 to quantify the ambient noise during the noisiest peak traffic hours and the quietest nighttime hours.<sup>27</sup> The General Plan uses the  $L_{dn}$  measure in establishing recommended maximum noise levels for various land uses throughout the City. The ambient  $L_{dn}$  at the project site was calculated at 66 dBA with adjustments made to simulate the background noise without the noise generated by the existing rooftop equipment on the project site since the cooling equipment the ISE facility cannot be turned off without harming the computer equipment. This ambient 66 dBA  $L_{dn}$  noise level is consistent with the City's Background Noise Map modeled by Department of Public Health (DPH). That map shows a 65 dBA  $L_{dn}$  noise level along the property's Paul Avenue frontage and 55 dBA  $L_{dn}$  at the center of the site.

The San Francisco Noise Ordinance (Noise Ordinance) measures maximum noise occurring during shorter increments and defines ambient noise levels as the sound level that is equaled or exceeded 90 percent of the time ( $L_{90}$ ). This metric effectively filters out infrequent high noise level events.  $L_{90}$  noise levels were taken along the property lines of the project site using short-term monitoring measures for use in determining the project's compliance with the Noise Ordinance. Longer, 24-hour measurements were conducted on Gould Street and Carroll Avenue for use in determining the  $L_{dn}$  ambient noise level. Measurements were not taken at the

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<sup>27</sup> CSDA Design Group, *200 Paul Avenue Datacenter Rooftop Equipment and Standby Generator Noise Analysis*, dated May 14, 2013. A copy of this report is available for review at the Planning Department offices at 1650 Mission Street, Suite 400, as part of Case No. 2012.0153E.

northern property line due to its inaccessibility and the distance from the stationary noise sources, the rooftop equipment, and the diesel generators on the project site.

Figure 8 - Land Use Compatibility Chart for Community Noise<sup>28</sup>

LAND USE CATEGORY	Sound Levels and Land Use Consequences (see explanation below)						
	Leq Value in Decibels						
	55	60	65	70	75	80	85
<b>RESIDENTIAL</b> All Dwellings, Group Quarters							
<b>TRANSIENT LODGING</b> Hotels, Motels							
<b>SCHOOL CLASSROOMS, LIBRARIES, CHURCHES, HOSPITALS, NURSING HOMES, ETC.</b>							
<b>AUDITORIUMS, CONCERT HALLS, AMPHITHEATRES, MUSIC SHELLS</b>							
<b>SPORTS ARENA, OUTDOOR SPECTATOR SPORTS</b>							
<b>PLAYGROUNDS, PARKS</b>							
<b>GOLF COURSES, RIDING STABLES, WATER-BASED RECREATION AREAS, CEMETERIES</b>							
<b>OFFICE BUILDINGS</b> Personal, Business, and Professional Services							
<b>COMMERCIAL</b> Retail, Movie Theatres, Restaurants							
<b>COMMERCIAL</b> Wholesale and Some Retail, Industrial/Manufacturing, Transportation, Communications and Utilities							
<b>MANUFACTURING</b> Noise-Sensitive <b>COMMUNICATIONS</b> Noise-Sensitive							



Satisfactory, with no special noise insulation requirements.



New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design.



New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.



New construction or development should generally not be undertaken.

A Rooftop Equipment and Standby Generator Noise Analysis, dated May 14, 2013, was completed for the proposed project by CSDA Design Group.<sup>29</sup> The analysis below summarizes the results of that analysis

<sup>28</sup> Land Use Compatibility Chart for Community Noise, Environmental Protection Element of the San Francisco General Plan

<sup>29</sup> CSDA Design Group, 2013.

regarding potential noise impacts that could result from the development of the proposed project. Noise impacts evaluated in this section include impacts to nearby receptors from noise generated by the proposed project's mobile sources (e.g., motor vehicles) and fixed stationary sources (e.g., diesel backup generators and rooftop cooling equipment) and noise and vibration impacts on nearby receptors from the project's construction activities.

Neighborhood residents located south of the project site have lodged complaints concerning noise from the existing rooftop mechanical equipment with both the DPH and Planning Department staff. Concerns were expressed that installation of roof-mounted equipment preceded the development of a high-pitched whining noise. DPH staff visited the site in early 2011 and found that the noise levels at the property line were within the 8 dBA  $L_{90}$  maximum allowable increase. However, upon further discussions with DPH staff and the project sponsor, the noise was attributed to tonal noise that is a pure tone noise that is typically more bothersome to surrounding residents. The addition of several roof-mounted air screw chillers coincided with the noise complaints. These chillers produce a noise with tonal elements that is unique to certain types of mechanical equipment and has a higher propensity for annoyance than non-tonal noise.<sup>30</sup>

A noise analysis of the existing rooftop equipment was conducted to evaluate these levels against the requirements of the San Francisco Noise Ordinance. It found that the facility was in compliance with the maximum 8 dBA  $L_{90}$  increase allowed at the southern property plane which is the area of the site closest to the residences reporting the noise. In February 2013, the project sponsor added chiller sound blankets to two roof-mounted chillers that it identified as the source of the tonal noise annoyance and has reported that it is less perceptible

**Impact NO-1: Operation of the proposed project would generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies or result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. (Less than Significant with Mitigation)**

**Noise from Additional Employee Vehicle Trips.** A total of 25 additional employees are anticipated to be generated, or a maximum of nine employees during the day shift. Based on the San Francisco Transportation Guidelines, these nine employees would be expected to generate five vehicle trips per shift. The general rule is that a doubling of traffic volumes on a given street is needed before any increase in vehicle noise is perceived. As an increase of five vehicles would not double the number of vehicles using Paul Avenue, there would not be any perceptible increase due to transportation-generated noise as a result of the project.

**Noise from Outside Equipment.** The Noise Ordinance limits noise levels generated on commercial and industrial properties to a maximum 8 dBA  $L_{90}$  increase above the ambient level at the property plane.<sup>31</sup> To evaluate the proposed project, the noise analysis evaluated the planned testing schedule of the existing and

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<sup>30</sup> Tonal elements are considered to exist when a single third octave noise level is more than 5 dB greater than the average of the two adjacent third octave bands. These sources may not be accurately evaluated through the average or non-frequency based (i.e. A-weighted) noise assessments. Tonal noise is typically perceived as a whine, screech, or hum.

<sup>31</sup> The San Francisco Noise Ordinance stipulates allowable dBA  $L_{90}$  increases at the property plane of the site generating the noise. This plane extends from the existing grade upwards to infinity along the site's property line. In cases of receptors and noise sources in multi-story buildings, this allows for an accurate evaluation of the noise level at an elevation above ground level, where applicable. The proposed project was evaluated consistent with this methodology as both some of the stationary source (roof-mounted cooling equipment) and some receptors (multi-story residences) were present at elevations above the existing grade.

proposed diesel generators from 8:00 am to 5:00 pm. The noise analysis also included the rooftop equipment in the project site-generated noise level as the Noise Ordinance requires all on-site sources be evaluated for purposes of compliance with the ordinance.

The resultant noise levels generated by the expanded ISE facility are projected to meet the requirements of the Noise Ordinance and be within the maximum allowable increase of 8 dBA  $L_{90}$  at the southern property plane. However, noise levels along the western and eastern property lines are projected to exceed the allowable 8 dBA  $L_{90}$  increase by 5 dBA  $L_{90}$ , producing a total increase of 13 dBA  $L_{90}$  at both of these two property planes. The projected noise increase along the northern property line was not modeled due to its long distance from the outdoor equipment and the presence of the intervening warehouse building as noise is attenuated (lessened) by both distance and structures.

Implementation of **Mitigation Measure M-NO-1: Attenuation of Noise from Outdoor Equipment** would reduce the projected increase in the ambient noise level at the western property line to 8 dBA  $L_{90}$ , rather than 13 dBA  $L_{90}$ , which would be within the maximum allowable increase specified in the City's Noise Ordinance and would result in a less-than-significant increase in the ambient noise level along the western property line. Figure 9 on p. 54 shows the recommended configuration of a noise attenuation wall in the area of the generator service yard. Figure 10 on p. 55 shows the height of the noise attenuation wall in the context of its location.

#### **Mitigation Measure M-NO-1: Attenuation of Noise from Outdoor Equipment**

The project sponsor shall implement the noise attenuation measures in the 200 Paul Rooftop Equipment and Standby Generator Noise Analysis prepared May 14, 2013 by CSDA Design Group that include the following measures. A noise attenuation wall shall be constructed along the entire western edge of the existing and expanded generator service yard with a minimum 60-foot-long return along the northern edge of the service yard. The height of the noise attenuation wall shall extend a minimum of four feet above the highest exhaust stack or portion of the diesel generators in the service yard and shall have a minimum surface density of three pounds per square foot (3 psf) with no gaps or breaks. In order to reduce reflected noise towards the east side of the property, the interior face of the noise attenuation wall shall incorporate acoustically absorptive materials with a minimum Noise Reduction Coefficient (NRC)<sup>32</sup> rating of 0.65. All new generators installed on the 18 concrete pads shall be 4 decibel A-weighting (dBA) quieter than the existing generators which have a measured noise level of 79 dBA at 25 feet and 73 dBA at 50 feet. A detailed design of the noise attenuation wall shall be submitted for review and approval by the Planning Department prior to issuance of a building permit and shall be installed prior to the operation of any of the additional 18 backup generators.

This Initial Study considers the potential impacts that could result from implementation of **Mitigation Measure M-NO-1: Attenuation of Noise from Outdoor Equipment**. These potential impacts are evaluated in Impact LU-2 in the Land Use and Land Use Planning section on p. 24, in Impact AE-3 in the Aesthetics section on p. 26, in Impact WS-1 in the Wind and Shadow section on p. 87, and in Impact GE-2 in the Geology and Soils section on p. 99.

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<sup>32</sup> Noise Reduction Coefficient is a measure of the acoustical absorption performance of a material, calculated by averaging its sound absorption coefficients at 250, 500, 1000, and 2000 Hz, expressed to the nearest integral multiple of 0.05.



The eastern property line of the project site adjoins the existing 125-foot-wide Caltrain right-of-way. The increase in the noise level along this property line that would be produced by the ISE expansion would exceed the maximum 8 dBA  $L_{90}$  permitted by the Noise Ordinance. Due to the layout of the diesel generators along this side of the ISE facility and the resultant length of a noise attenuation wall necessary to reduce noise levels to the maximum allowed by the Noise Ordinance, a noise attenuation wall would be economically infeasible for the project sponsor. The Noise Ordinance allows the granting of variances from its provisions based on a number of factors, one being physical characteristics and geography. Given the eastern property line abuts an active rail line, rather than an inhabited structure or outdoor use, other criteria were employed for purposes of determining whether the project would have a significant noise impact under CEQA. These criteria included both the General Plan Noise land use compatibility guidelines and the CalTrans Technical Noise Supplement<sup>33</sup> that sets a minimum 3 dBA  $L_{dn}$  noise increase as the minimum needed before a perceptible increase in noise is heard by human receptors.

The land uses on the eastern side of the Caltrain rail tracks include a church, mixed-use residential project with senior center, and commercial businesses. All about Third Street on the east, as well as the active Caltrain rail line on the west. The General Plan recommends maximum  $L_{dn}$  noise levels of 65 dBA for churches and 78 dBA for commercial buildings without the provision of special noise insulation. A maximum noise level of 70 dBA  $L_{dn}$  was used for the mixed-use project at 5800 Third Street as it is a new project being constructed in an area above 60 dBA  $L_{dn}$  and would have special noise insulation due to the existing elevated ambient noise levels in the area. The project would produce noise levels at these properties that are less than the maximum-permitted General Plan noise levels with the exception of the church, located on the corner of Third Street and Paul Avenue. The church site has an ambient noise level of 66 dBA  $L_{dn}$  that currently exceeds the General Plan recommended maximum noise level of 65 dBA  $L_{dn}$  (without special noise insulation). The proposed ISE expansion would increase the  $L_{dn}$  noise level at this property by one dBA. This increase is consistent with the noise increase the project would have at all of the properties along the eastern edge of the Caltrain right-of-way. Increases of less than 3 dBA  $L_{dn}$  are not deemed to be perceptible to the human ear; therefore, the noise generated by the increased generator testing would not be perceptible. Therefore, the proposed project would result in a less-than-significant increase in noise levels for properties along the eastern side of the Caltrain right-of-way in the area of the project site.

**Impact NO-2: During construction, the proposed project would result in a temporary or periodic increase in ambient noise and vibration levels in the project vicinity, above levels existing without the project, but any construction-related increase in noise and vibration levels would not be substantial. (Less than Significant)**

Demolition, excavation and building construction would temporarily increase noise, and possibly vibration, in the project vicinity. During the construction phase, the amount of construction noise generated would be influenced by equipment type and duration of use, distance between noise source and listener, and presence or absence of barriers (including subsurface barriers). Construction equipment would generate noise and possibly vibrations that could be considered an annoyance by occupants of nearby properties. There would be times when noise and vibration could interfere with indoor activities in nearby businesses. The nearest sensitive receptors to the project site are the residences on the south side of Paul Avenue, approximately 60 feet south of the project site.

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<sup>33</sup> California Department of Transportation, Technical Noise Supplement, October 1998. Access May 20, 2013, Available online at [http://www.dot.ca.gov/hq/env/noise/pub/Technical percent20Noise percent20Supplement.pdf](http://www.dot.ca.gov/hq/env/noise/pub/Technical%20Noise%20Supplement.pdf).

According to the project sponsor, the construction period would last approximately 6 months. A mat slab or spread footing foundation with a maximum depth of four feet would be used for this project, and no significant noise generating equipment (including pile driving) would be used during the construction phase of the project. Construction would occur Monday through Friday, 7:00 a.m. to 6:00 p.m. The proposed project would not create unusual levels of groundborne vibration that would disturb nearby businesses and occupants.

Construction noise and vibration impacts would be temporary in nature and limited to the period of construction. Construction noise and vibration would fluctuate depending on the construction phase, equipment type and duration of use, and distance between noise source and listener. Further, construction noise and vibration would be intermittent and limited to the period of construction. Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the Police Code). The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA at a distance of 100 feet from the source. Section 2908 of the ordinance prohibits construction between 8:00 p.m. and 7:00 a.m., if noise would exceed the ambient noise level by 5 dBA at the proposed project property line, unless a special permit is authorized by the Director of the Department of Public Works (DPW) or Department of Building Inspection (DBI). Furthermore, complying with the ordinance's allowable construction time of day would reduce the potential to cause sleep disturbances due to noise at nearby sensitive receptors. Compliance with the noise ordinance would ensure that potential construction noise impacts would be less than significant, including noise effects on nearby residents.

**Noise from Construction Truck Traffic.** Throughout the construction period there would be truck traffic to and from the site, hauling away excavated materials and debris, or delivering building materials. It is anticipated that construction hours would occur from 7:00 a.m. to 6:00 p.m. during the week. The average daily construction-related truck trips would be 15 to 20 trips, with a maximum of 25 trips during the peak construction period. Noise from truck traffic is not expected to cause a significant impact, given ambient noise levels in the project site vicinity and the limited hours and duration of project construction.

**San Francisco Noise Ordinance Requirements.** Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the Police Code). The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA at a distance of 100 feet from the source. Impact tools (jackhammers, hoe rammers, impact wrenches) must have both intake and exhaust muffled to the satisfaction of the Director of Public Works or the Director of Building Inspection. Section 2908 of the Ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m., if noise would exceed the ambient noise level by 5 dBA at the project property line, unless a special permit is authorized by the Director of Public Works or the Director of Building Inspection. The project must comply with regulations set forth in the Noise Ordinance. The increase in noise and vibration in the project area during project construction would be considered less than significant because it would be temporary, intermittent, and restricted in occurrence and level, as the contractor would be required to comply with the City's Noise Ordinance.

In light of the above, the project's construction noise impact would be less than significant.

**Impact NO-3: - Operation of the proposed project would not be substantially affected by existing or proposed noise levels. (Less than Significant)**

An ISE, or a data center, is not considered a noise-sensitive use, as operations are conducted inside enclosed buildings and are not dependent on low noise levels for communication or other purposes. The proposed project would expand an existing ISE that would be categorized as Commercial – Wholesale and some retail, Industrial/ Manufacturing, Transportation, Communications, and Utilities buildings, on the General Plan Land Use compatibility table. The existing ISE is located within an area with an ambient Ldn of 66 dBA Ldn along the property's street frontage and 55 dBA Ldn in the center of the site. The General Plan identifies this type of use as not requiring any special insulation measures at 75 dBA Ldn and less. Therefore, the impact of the existing outdoor ambient noise levels on the operation of the ISE facility would be less than significant.

**Impact C-NO-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would have a significant cumulative noise impact. (Less than Significant with Mitigation)**

Construction activities in the vicinity of the project site, such as excavation, grading, or construction of other buildings in the area, would occur on a temporary and intermittent basis, similar to the project. Project construction-related noise would not substantially increase ambient noise levels in the project vicinity. As such, construction noise effects associated with the proposed project are not anticipated to combine with those associated with other proposed and ongoing projects located near the project site. Therefore, cumulative construction-related noise impacts would be less than significant.

Localized traffic noise would increase in conjunction with foreseeable residential and commercial growth in the project vicinity. However, because neither the proposed project nor the other cumulative projects in the vicinity are anticipated to result in a doubling of traffic volumes along nearby streets, the project would not contribute considerably to any cumulative traffic-related noise.

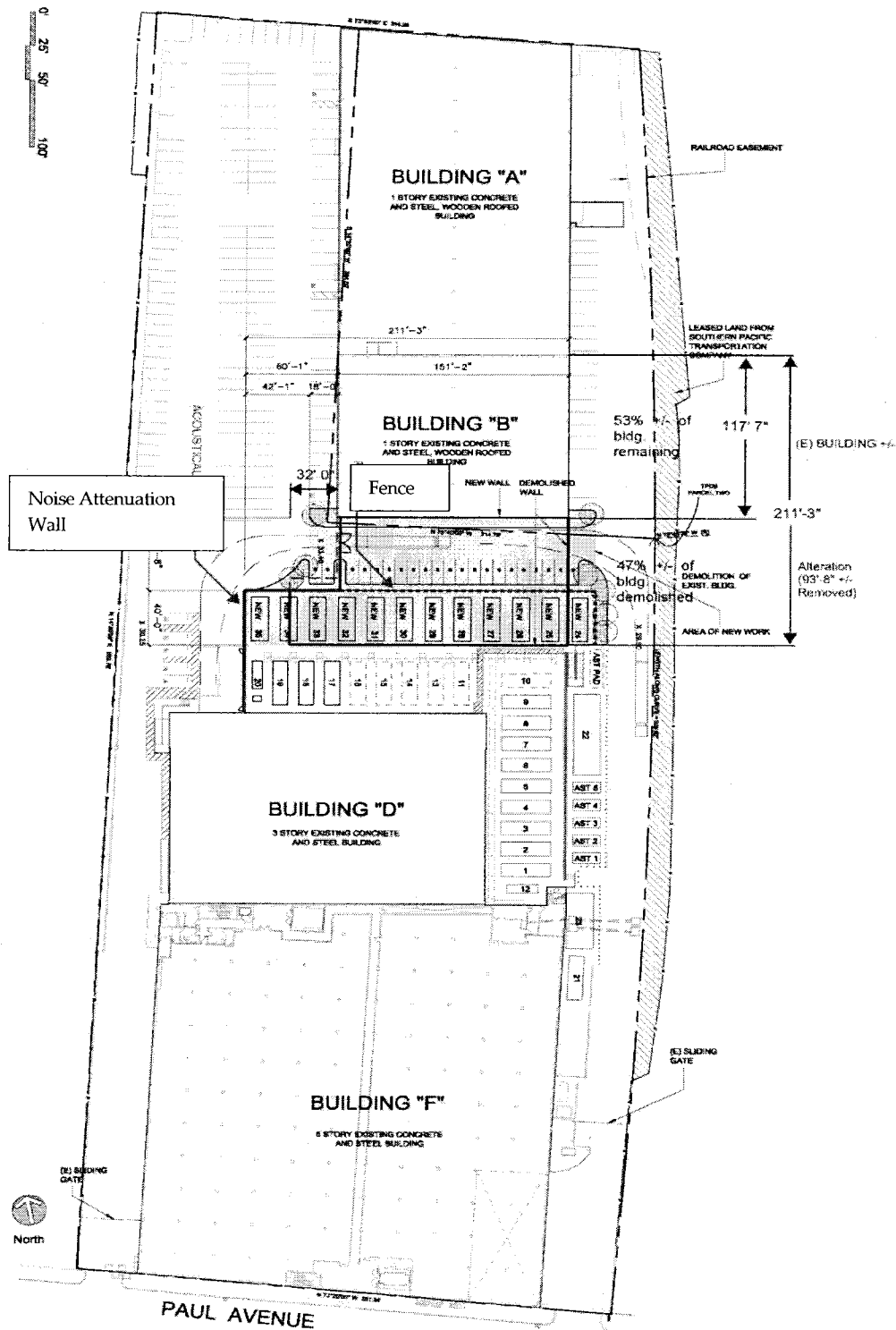
Vibration impacts are not anticipated during construction as no pile-driving would be used to construct the project and is not anticipated to be used during the construction of the proposed data center at 400 Paul Avenue. Additionally, the operation of the new diesel backup generators would not produce vibration impacts, and would not combine to result in cumulative vibration impacts.

The BVHP FEIR<sup>34</sup> evaluated cumulative noise levels from new development approved for the BVHP Area Plan and found that traffic and other noise resulting from new development would have less-than-significant noise impact. Noise levels from past, present, and reasonably foreseeable projects in the vicinity would adhere to the Noise Ordinance. The closest project with stationary noise sources would be the planned new ISE at 400 Paul Avenue. Given its proximity to the project site it may result in an increase to the ambient noise levels in an area that would also see increased noise levels due to the 200 Paul Avenue project. Though, upon implementation of **Mitigation Measure N-NO-1: Attenuation of Noise from Outdoor Equipment**, the proposed ISE expansion would not result in any project-related significant noise impacts, nor would it have a considerable contribution to any significant cumulative impact. Therefore, the cumulative noise impacts would be less than significant with mitigation.

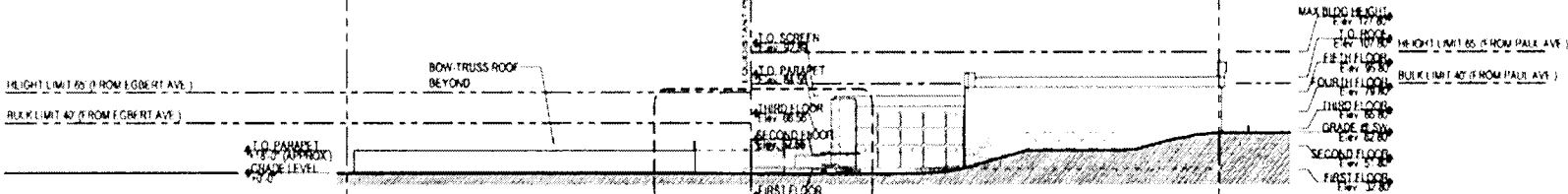
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<sup>34</sup> Bayview Hunters Point Redevelopment Projects and Rezoning Final EIR, 2006.

Figure 9 - Location of Noise Attenuation Enclosure

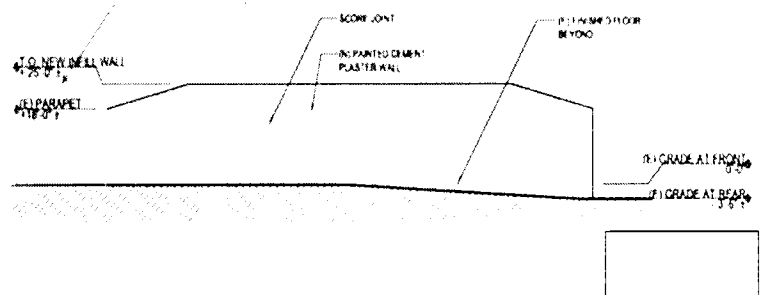
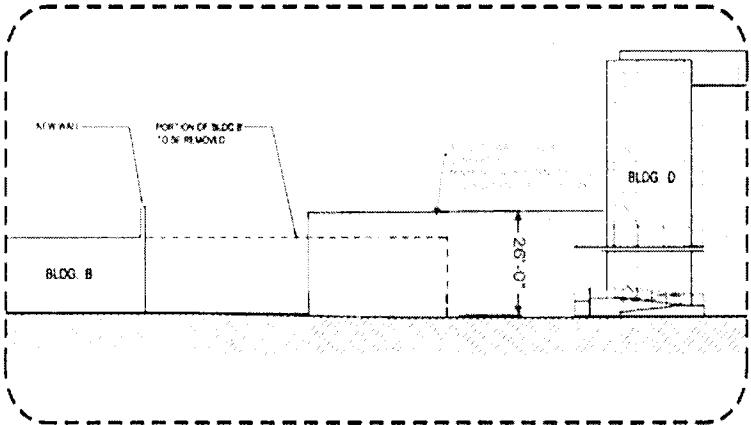


4. 2



(1" = 100')

**Note:** Grade line north of Building 'D' is intended as an approximation of the existing condition and is to be verified.



<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>E.7. Air Quality</b>					
Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Environmental Setting

The BAAQMD is the regional agency with jurisdiction over the nine-county San Francisco Bay Area Air Basin (SFBAAB), which includes San Francisco, Alameda, Contra Costa, Marin, San Mateo, Santa Clara, and Napa Counties and portions of Sonoma and Solano Counties. The BAAQMD is responsible for attaining and maintaining air quality in the SFBAAB within federal and state air quality standards, as established by the federal Clean Air Act (CAA) and the California Clean Air Act (CCAA), respectively. Specifically, the BAAQMD has the responsibility to monitor ambient air pollutant levels throughout the SFBAAB and to develop and implement strategies to attain the applicable federal and state standards. The CAA and the CCAA require plans to be developed for areas that do not meet air quality standards, generally. The most recent air quality plan, the *2010 Clean Air Plan*, was adopted by the BAAQMD on September 15, 2010. The *2010 Clean Air Plan* updates the *Bay Area 2005 Ozone Strategy* in accordance with the requirements of the CCAA to implement all feasible measures to reduce ozone; provide a control strategy to reduce ozone, particulate matter, air toxics, and greenhouse gases in a single, integrated plan; and establish emission control measures to be adopted or implemented. The 2010 Clean Air Plan contains the following primary goals:

- Attain air quality standards;
- Reduce population exposure and protect public health in the San Francisco Bay Area; and
- Reduce greenhouse gas emissions and protect the climate.

The *2010 Clean Air Plan* represents the most current applicable air quality plan for the SFBAAB. Consistency with this plan is the basis for determining whether the proposed project would conflict with or obstruct implementation of air quality plans.

## Criteria Air Pollutants

In accordance with the state and federal CAAs, air pollutant standards are identified for the following six criteria air pollutants: ozone, carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), and lead. These air pollutants are termed criteria air pollutants because they are regulated by developing specific public health- and welfare-based criteria as the basis for setting permissible levels. In general, the SFBAAB experiences low concentrations of most pollutants when compared to federal or state standards. The SFBAAB is designated as either in attainment<sup>35</sup> or unclassified for most criteria pollutants with the exception of ozone, PM<sub>2.5</sub>, and PM<sub>10</sub>, for which these pollutants are designated as non-attainment for either the state or federal standards. By its very nature, regional air pollution is largely a cumulative impact in that no single project is sufficient in size to, by itself, result in non-attainment of air quality standards. Instead, a project's individual emissions contribute to existing cumulative air quality impacts. If a project's contribution to cumulative air quality impacts is considerable, then the project's impact on air quality would be considered significant.<sup>36</sup>

Land use projects may contribute to regional criteria air pollutants during the construction and operational phases of a project. Table 4 identifies air quality significance thresholds followed by a discussion of each threshold. Projects that would result in criteria air pollutant emissions below these significance thresholds would not violate an air quality standard, contribute substantially to an air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants within the SFBAAB.

**Table 4 - Criteria Air Pollutant Significance Thresholds**

Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs./day)	Average Daily Emissions (lbs./day)	Annual Maximum Emissions (tons/year)
ROG	54	54	10
NO <sub>x</sub>	54	54	10
PM <sub>10</sub>	82 (exhaust)	82	15
PM <sub>2.5</sub>	54 (exhaust)	54	10
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable	

**Ozone Precursors.** As discussed previously, the SFBAAB is currently designated as non-attainment for ozone and particulate matter. Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG) and oxides of nitrogen (NO<sub>x</sub>). The potential for a project to result in a cumulatively considerable net increase in criteria air pollutants, which may contribute to an existing or projected air quality violation, are based on the state and federal Clean Air Acts emissions limits for stationary sources. To ensure that new stationary sources do not cause or contribute to a

<sup>35</sup> "Attainment" status refers to those regions that are meeting federal and/or state standards for a specified criteria pollutant. "Non-attainment" refers to regions that do not meet federal and/or state standards for a specified criteria pollutant. "Unclassified" refers to regions where there is not enough data to determine the region's attainment status for a specified criteria pollutant.

<sup>36</sup> Bay Area Air Quality Management District (BAAQMD), *California Environmental Quality Act Air Quality Guidelines*, May 2011, page 2-1.

violation of an air quality standard, BAAQMD Regulation 2, Rule 2 requires that any new source that emits criteria air pollutants above a specified emissions limit must offset those emissions. For ozone precursors ROG and NO<sub>x</sub>, the offset emissions level is an annual average of 10 tons per year (or 54 pounds (lbs.) per day).<sup>37</sup> These levels represent emissions by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants.

**Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>).**<sup>38</sup> The federal New Source Review (NSR) program was created by the federal CAA to ensure that stationary sources of air pollution are constructed in a manner that is consistent with attainment of federal health based ambient air quality standards. For PM<sub>10</sub> and PM<sub>2.5</sub>, the emissions limit under NSR is 15 tons per year (82 lbs. per day) and 10 tons per year (54 lbs. per day), respectively. These emissions limits represent levels at which a source is not expected to have an impact on air quality.<sup>39</sup> Although the regulations specified above apply to new or modified stationary sources, land use development projects result in ROG, NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions as a result of increases in vehicle trips, architectural coating and construction activities. Therefore, the above thresholds can be applied to the construction and operational phases of land use projects and those projects that result in emissions below these thresholds would not be considered to contribute to an existing or projected air quality violation or result in a considerable net increase in ozone precursors or particulate matter. Due to the temporary nature of construction activities, only the average daily thresholds are applicable to construction phase emissions.

**Fugitive Dust.** Fugitive dust emissions are typically generated during construction phases. Studies have shown that the application of best management practices (BMPs) at construction sites significantly control fugitive dust.<sup>40</sup> Individual measures have been shown to reduce fugitive dust by anywhere from 30 to 90 percent.<sup>41</sup> The BAAQMD has identified a number of BMPs to control fugitive dust emissions from construction activities.<sup>42</sup> The City's Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) (Dust Control Ordinance) requires a number of fugitive dust control measures to ensure that construction projects do not result in visible dust. The BMPs employed in compliance with the Dust Control Ordinance is an effective strategy for controlling construction-related fugitive dust.

### Local Health Risks and Hazards

In addition to criteria air pollutants, individual projects may emit toxic air contaminants (TACs). TACs collectively refer to a diverse group of air pollutants that are capable of causing chronic (i.e., of long-duration) and acute (i.e., severe but of short-term) adverse effects to human health, including carcinogenic effects. Human health effects of TACs include birth defects, neurological damage, cancer, and death. There are hundreds of different types of TACs with varying degrees of toxicity. Individual TACs vary greatly in the

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<sup>37</sup> BAAQMD, Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance, October 2009, page 17.

<sup>38</sup> PM<sub>10</sub> is often termed "coarse" particulate matter and is made of particulates that are 10 microns in diameter or smaller. PM<sub>2.5</sub>, termed "fine" particulate matter, is composed of particles that are 2.5 microns or less in diameter.

<sup>39</sup> BAAQMD, 2009, page 16.

<sup>40</sup> Western Regional Air Partnership. 2006. *WRAP Fugitive Dust Handbook*. September 7, 2006. This document is available online at [http://www.wrapair.org/forums/dej/f/fdh/content/FDHandbook\\_Rev\\_06.pdf](http://www.wrapair.org/forums/dej/f/fdh/content/FDHandbook_Rev_06.pdf), accessed February 16, 2012.

<sup>41</sup> BAAQMD, 2009, page 27.

<sup>42</sup> BAAQMD, 2011.



health risk they present; at a given level of exposure, one TAC may pose a hazard that is many times greater than another.

Unlike criteria air pollutants, TACs do not have ambient air quality standards but are regulated by the BAAQMD using a risk-based approach to determine which sources and pollutants to control as well as the degree of control. A health risk assessment is an analysis in which human health exposure to toxic substances is estimated, and considered together with information regarding the toxic potency of the substances, to provide quantitative estimates of health risks.<sup>43</sup>

Air pollution does not affect every individual in the population in the same way, and some groups are more sensitive to adverse health effects than others. Land uses such as residences, schools, children's day care centers, hospitals, and nursing and convalescent homes are considered to be the most sensitive to poor air quality because the population groups associated with these uses have increased susceptibility to respiratory distress or, as in the case of residential receptors, their exposure time is greater than for other land uses. Therefore, these groups are referred to as sensitive receptors. Exposure assessment guidance typically assumes that residences would be exposed to air pollution 24 hours per day, 350 days per year, for 70 years. Therefore, assessments of air pollutant exposure to residents typically result in the greatest adverse health outcomes of all population groups.

Exposures to fine particulate matter (PM<sub>2.5</sub>) are strongly associated with mortality, respiratory diseases, and lung development in children, and other endpoints such as hospitalization for cardiopulmonary disease.<sup>44</sup> In addition to PM<sub>2.5</sub>, diesel particulate matter (DPM) is also of concern. The California Air Resources Board (ARB) identified DPM as a TAC in 1998, primarily based on evidence demonstrating cancer effects in humans.<sup>45</sup> The estimated cancer risk from exposure to diesel exhaust is much higher than the risk associated with any other TAC routinely measured in the region.

In an effort to identify areas of San Francisco most adversely affected by sources of TACs, San Francisco partnered with the BAAQMD to inventory and assess air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed "air pollution hot spots," were identified based on two health-protective criteria: (1) excess cancer risk from the contribution of emissions from all modeled sources greater than 100 per one million population, and/or (2) cumulative PM<sub>2.5</sub> concentrations greater than 10 micrograms per cubic meter (µg/m<sup>3</sup>).

**Excess Cancer Risk.** The above 100 per one million persons (100 excess cancer risk) criteria is based on United State Environmental Protection Agency (USEPA) guidance for conducting air toxic analyses and making risk management decisions at the facility and community-scale level.<sup>46</sup> As described by the BAAQMD, the USEPA considers a cancer risk of 100 per million to be within the "acceptable" range of cancer risk. Furthermore, in the 1989 preamble to the benzene National Emissions Standards for Hazardous Air Pollutants (NESHAP)

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<sup>43</sup> In general, a health risk assessment is required if the BAAQMD concludes that projected emissions of a specific air toxic compound from a proposed new or modified source suggest a potential public health risk. The applicant is then subject to a health risk assessment for the source in question. Such an assessment generally evaluates chronic, long-term effects, estimating the increased risk of cancer as a result of exposure to one or more TACs.

<sup>44</sup> SFDPH, Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review, May 2008.

<sup>45</sup> California Air Resources Board (ARB), Fact Sheet, "The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines," October 1998.

<sup>46</sup> BAAQMD, 2009, page 67.

rulemaking,<sup>47</sup> the USEPA states that it "...strives to provide maximum feasible protection against risks to health from hazardous air pollutants by (1) protecting the greatest number of persons possible to an individual lifetime risk level no higher than approximately one in one million and (2) limiting to no higher than approximately one in ten thousand [100 in one million] the estimated risk that a person living near a plant would have if he or she were exposed to the maximum pollutant concentrations for 70 years." The 100 per one million excess cancer cases is also consistent with the ambient cancer risk in the most pristine portions of the Bay Area based on BAAQMD regional modeling.<sup>48</sup>

**Fine Particulate Matter.** In April 2011, the USEPA published *Policy Assessment for the Particulate Matter Review of the National Ambient Air Quality Standards*, "Particulate Matter Policy Assessment." In this document, USEPA staff concludes that the current federal annual PM<sub>2.5</sub> standard of 15 µg/m<sup>3</sup> should be revised to a level within the range of 13 to 11 µg/m<sup>3</sup>, with evidence strongly supporting a standard within the range of 12 to 11 µg/m<sup>3</sup>. Air pollution hot spots for San Francisco are based on the health protective PM<sub>2.5</sub> standard of 11 µg/m<sup>3</sup>, as supported by the USEPA's Particulate Matter Policy Assessment, although lowered to 10 µg/m<sup>3</sup> to account for uncertainty in accurately predicting air pollutant concentrations using emissions modeling programs. Land use projects within these air pollution hot spots require special consideration to determine whether the project's activities would expose sensitive receptors to substantial air pollutant concentrations or add emissions to areas already adversely affected by poor air quality.

### **Construction Air Quality Impacts**

Project-related air quality impacts fall into two categories: short-term impacts from construction and long term impacts from project operation. The following addresses construction-related air quality impacts resulting from the proposed project.

**Impact AQ-1: The proposed project's construction activities would generate fugitive dust and criteria air pollutants, but would not violate an air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants. (Less than Significant)**

Construction activities (short-term) typically result in emissions of ozone precursors and particulate matter in the form of dust (fugitive dust) and exhaust (e.g., vehicle tailpipe emissions). Emissions of ozone precursors and particulate matter are primarily a result of the combustion of fuel from on-road and off-road vehicles. However, ROG's are also emitted from activities that involve painting, other types of architectural coatings, or asphalt paving. The proposed project includes the removal of an approximately 16,000-square-foot portion of the southernmost warehouse and expansion of the existing generator service yard by approximately 21,175 square feet to accommodate 12 additional concrete pads for new diesel generators. During the project's approximately six month construction period, construction activities would have the potential to result in fugitive dust, ozone precursors and particulate matter emissions, as discussed below.

**Fugitive Dust.** Project-related demolition, excavation, grading, and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. Although there are federal standards for air pollutants and implementation of state and regional air quality control plans, air

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<sup>47</sup> 54 Federal Register 38044, September 14, 1989.

<sup>48</sup> BAAQMD, 2009, page 67.

pollutants continue to have impacts on human health throughout the country. California has found that particulate matter exposure can cause health effects at lower levels than national standards. The current health burden of particulate matter demands that, where possible, public agencies take feasible available actions to reduce sources of particulate matter exposure.

Dust can be an irritant causing watering eyes or irritation to the lungs, nose, and throat. Demolition, excavation, grading, and other construction activities can cause wind-blown dust that adds particulate matter to the local atmosphere. Depending on exposure, adverse health effects can occur due to this particulate matter in general and also due to specific contaminants such as lead or asbestos that may be constituents of soil.

In response, the San Francisco Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes generally referred hereto as the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) with the intent of reducing the quantity of dust generated during site preparation, demolition and construction work in order to protect the health of the general public and of onsite workers, minimize public nuisance complaints, and to avoid orders to stop work.

The Ordinance requires that all site preparation work, demolition, or other construction activities within San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures whether or not the activity requires a permit from DBI. The Director of DBI may waive this requirement for activities on sites less than one half-acre that are unlikely to result in any visible wind-blown dust.

In compliance with the Construction Dust Control Ordinance, the project sponsor and the contractor responsible for construction activities at the project site would be required to use the following practices to control construction dust on the site or other practices that result in equivalent dust control that are acceptable to the Director. Dust suppression activities may include watering all active construction areas sufficiently to prevent dust from becoming airborne; increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water must be used if required by Article 21, Section 1100 et seq. of the San Francisco Public Works Code (Public Works Code). If not required, reclaimed water should be used whenever possible. Contractors shall provide as much water as necessary to control dust (without creating run-off in any area of land clearing, and/or earth movement). During excavation and dirt-moving activities, contractors shall wet sweep or vacuum the streets, sidewalks, paths, and intersections where work is in progress at the end of the workday. Inactive stockpiles (where no disturbance occurs for more than seven days) greater than 10 cubic yards or 500 square feet of excavated material, backfill material, import material, gravel, sand, road base, and soil shall be covered with a 10 mil (0.01 inch) polyethylene plastic (or equivalent) tarp, braced down, or use other equivalent soil stabilization techniques.

Compliance with the regulations and procedures set forth by the San Francisco Dust Control Ordinance would ensure that potential dust-related air quality impacts would be reduced to a level of insignificance.

**Criteria Air Pollutants.** As discussed above, construction activities would result in emissions of criteria air pollutants from the use of off- and on-road vehicles and equipment. To assist lead agencies in determining whether short-term construction-related air pollutant emissions require further analysis as to whether the project may exceed the criteria air pollutant significance thresholds shown in Table 4 on p. 57 above, the BAAQMD, in its *CEQA Air Quality Guidelines* (May 2011), developed screening criteria. If a proposed project meets the screening criteria, then construction of the proposed project would result in less-than-significant criteria air pollutant impacts. A project that exceeds the screening criteria may require a detailed air quality

assessment to determine whether criteria air pollutant emissions would exceed significance thresholds. The *CEQA Air Quality Guidelines* note that the screening levels are generally representative of new development on greenfield<sup>49</sup> sites without any form of mitigation measures taken into consideration. In addition, the screening criteria do not account for project design features, attributes, or local development requirements that could also result in lower emissions.

The proposed project includes the removal of an approximately 16,000-square-foot portion of the southernmost warehouse and expansion of the existing generator service yard by approximately 21,175 square feet to accommodate 12 additional concrete pads for new diesel generators. The size of proposed construction activities would be well below the criteria air pollutant screening size of 259,000 square feet for the General Light Industry land use category identified in the BAAQMD's *CEQA Air Quality Guidelines*. Thus, quantification of construction-related criteria air pollutant emissions is not required and the proposed project's construction activities would result in a less-than-significant criteria air pollutant impact.

**Impact AQ-2: The proposed project's construction activities would generate toxic air contaminants, including diesel particulate matter, which would expose sensitive receptors to substantial pollutant concentrations. (Less than Significant with Mitigation)**

As discussed above, San Francisco, in partnership with BAAQMD, has modeled and assessed air pollutant impacts from mobile, stationary and area sources within the City. This assessment has resulted in the identification of air pollution hot spots, based on significance thresholds for PM<sub>2.5</sub> and excess cancer risk, or areas within the City that deserve special attention when siting uses that either emit TACs or uses that are considered sensitive to air pollution. The project site is located within an air pollution hot spot, meaning that existing excess cancer risk exceeds 100 per one million and/or ambient PM<sub>2.5</sub> concentrations exceed 10 µg/m<sup>3</sup>. The nearest sensitive receptors to the project site are the residences on the south side of Paul Avenue, approximately 60 feet south of the project site. Other nearby sensitive receptors include residences on the north side of Egbert Avenue, approximately 330 feet north of the project site, and residences on the west side of Third Street across the Caltrain tracks, approximately 390 feet east of the project site.

Off-road equipment (which includes construction-related equipment) is a large contributor to DPM emissions in California, although since 2007, the ARB has found the emissions to be substantially lower than previously expected.<sup>50</sup> Newer and more refined emission inventories have substantially lowered the estimates of DPM emissions from off-road equipment such that off-road equipment is now considered the sixth largest source of DPM emissions in California.<sup>51</sup> For example, revised estimates of particulate matter (PM) emissions (of which DPM is a major component) for the SFBAAB for the year 2010 have decreased by 83 percent from 2010 emissions estimates.<sup>52</sup> Approximately half of the reduction in emissions can be attributed to the economic recession and half to updated methodologies used to better assess construction emissions.<sup>53</sup>

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<sup>49</sup> A greenfield site refers to agricultural or forest land or an undeveloped site earmarked for commercial, residential, or industrial projects.

<sup>50</sup> ARB, Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements, p.1 and p. 13 (Figure 4), October 2010.

<sup>51</sup> ARB, 2010.

<sup>52</sup> ARB, "In-Use Off-Road Equipment, 2011 Inventory Model," Query accessed online, April 2, 2012, [http://www.arb.ca.gov/msei/categories.htm#inuse\\_or\\_category](http://www.arb.ca.gov/msei/categories.htm#inuse_or_category).

<sup>53</sup> ARB, 2010.

Additionally, a number of federal and state regulations are requiring cleaner off-road equipment. Specifically, both the USEPA and California have set emissions standards for new off-road equipment engines, ranging from Tier 1 to Tier 4. Tier 1 emission standards were phased in between 1996 and 2000 and Tier 4 Interim and Final emission standards for all new engines would be phased in between 2008 and 2015. To meet the Tier 4 emission standards, engine manufacturers will be required to produce new engines with advanced emission-control technologies. Although the full benefits of these regulations will not be realized for several years, the USEPA estimates that by implementing the federal Tier 4 standards, NO<sub>x</sub> and PM emissions will be reduced by more than 90 percent.<sup>54</sup> Furthermore, California regulations limit maximum idling times to five minutes, which further reduces public exposure to NO<sub>x</sub> and PM emissions.<sup>55</sup>

In addition, construction activities do not lend themselves to analysis of long-term health risks because of their temporary and variable nature. As explained in the BAAQMD's *CEQA Air Quality Guidelines*:

"Due to the variable nature of construction activity, the generation of TAC emissions in most cases would be temporary, especially considering the short amount of time such equipment is typically within an influential distance that would result in the exposure of sensitive receptors to substantial concentrations. Concentrations of mobile-source diesel PM emissions are typically reduced by 70 percent at a distance of approximately 500 feet (ARB 2005). In addition, current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 40, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. This results in difficulties with producing accurate estimates of health risk."<sup>56</sup>

Therefore, project-level analyses of construction activities have a tendency to produce overestimated assessments of long-term health risks. However, within air pollution hot spots, as discussed above, additional construction activity may adversely affect populations that are already at a higher risk for adverse long-term health effects from existing sources of air pollution.

The proposed project would require construction activities for the approximate six-month construction period. Project construction activities would result in short-term emissions of DPM and other TACs. The project site is located in an area that already experiences poor air quality and project construction activities would generate additional air pollution, affecting nearby sensitive receptors and resulting in a significant impact.

Implementation of **Mitigation Measure M-AQ-2: Construction Emissions Minimization**, below, would reduce the magnitude of this impact to a less-than-significant level. While emission reductions from limiting idling, educating workers and the public and properly maintaining equipment are difficult to quantify, other measures, specifically the requirement for equipment with Tier 2 engines and Level 3 Verified Diesel Emission Control Strategy (VDECS) can reduce construction emissions by 89 to 94 percent compared to equipment with engines meeting no emission standards and without a VDECS. Emissions reductions from the combination of Tier 2 equipment with Level 3 VDECS is almost equivalent to requiring only equipment with Tier 4 Final engines, which is not yet readily available for all engine sizes subject to M-AQ-2.

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<sup>54</sup>USEPA, "Clean Air Nonroad Diesel Rule: Fact Sheet," May 2004.

<sup>55</sup> California Code of Regulations, Title 13, Division 3, § 2485.

<sup>56</sup>BAAQMD, 2011, page 8-6.

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

- A. *Construction Emissions Minimization Plan.* Prior to issuance of a construction permit, the project sponsor shall submit a Construction Emissions Minimization Plan (Plan) to the Environmental Review Officer (ERO) for review and approval by an Environmental Planning Air Quality Specialist. The Plan shall detail project compliance with the following requirements:
1. All off-road equipment greater than 25 hp and operating for more than 20 total hours over the entire duration of construction activities shall meet the following requirements:
    - a) Where access to alternative sources of power are available, portable diesel engines shall be prohibited;
    - b) All off-road equipment shall have:
      - i. Engines that meet or exceed either U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 2 off-road emission standards, and
      - ii. Engines that are retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy (VDECS).<sup>57</sup>
    - c) Exceptions:
      - i. Exceptions to A(1)(a) may be granted if the project sponsor has submitted information providing evidence to the satisfaction of the ERO that an alternative source of power is limited or infeasible at the project site and that the requirements of this exception provision apply. Under this circumstance, the sponsor shall submit documentation of compliance with A(1)(b) for onsite power generation.
      - ii. Exceptions to A(1)(b)(ii) *may* be granted if the project sponsor has submitted information providing evidence to the satisfaction of the ERO that a particular piece of off-road equipment with an ARB Level 3 VDECS is: (1) technically not feasible, (2) would not produce desired emissions reductions due to expected operating modes, (3) installing the control device would create a safety hazard or impaired visibility for the operator, or (4) there is a compelling emergency need to use off-road equipment that are not retrofitted with an ARB Level 3 VDECS and the sponsor has submitted documentation to the ERO that the requirements of this exception provision apply. If granted an exception to A(1)(b)(ii), the project sponsor must comply with the requirements of A(1)(c)(iii).

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<sup>57</sup> Equipment with engines meeting Tier 4 Interim or Tier 4 Final emission standards automatically meet this requirement, therefore a VDECS would not be required.

- iii. If an exception is granted pursuant to A(1)(c)(ii), the project sponsor shall provide the next cleanest piece of off-road equipment as provided by the step down schedules in Table 5.

**Table 5 - Off-Road Equipment Compliance Step-down Schedule**

Compliance Alternative	Engine Emission Standard	Emissions Control
1	Tier 2	ARB Level 2 VDECS
2	Tier 2	ARB Level 1 VDECS
3	Tier 2	Alternative Fuel*

**How to use the table:** If the requirements of (A)(1)(b) cannot be met, then the project sponsor would need to meet Compliance Alternative 1. Should the project sponsor not be able to supply off-road equipment meeting Compliance Alternative 1, then Compliance Alternative 2 would need to be met. Should the project sponsor not be able to supply off-road equipment meeting Compliance Alternative 2, then Compliance Alternative 3 would need to be met. \* Alternative fuels are not a VDECS.

2. The project sponsor shall require the idling time for off-road and on-road equipment be limited to no more than two minutes, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment. Legible and visible signs shall be posted in multiple languages (English, Spanish, Chinese) in designated queuing areas and at the construction site to remind operators of the two minute idling limit.
  3. The project sponsor shall require that construction operators properly maintain and tune equipment in accordance with manufacturer specifications.
  4. The Plan shall include estimates of the construction timeline by phase with a description of each piece of off-road equipment required for every construction phase. Off-road equipment descriptions and information may include, but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For VDECS installed: technology type, serial number, make, model, manufacturer, ARB verification number level, and installation date and hour meter reading on installation date. For off-road equipment using alternative fuels, reporting shall indicate the type of alternative fuel being used.
  5. The Plan shall be kept on-site and available for review by any persons requesting it and a legible sign shall be posted at the perimeter of the construction site indicating to the public the basic requirements of the Plan and a way to request a copy of the Plan. The project sponsor shall provide copies of Plan to members of the public as requested.
- B. *Reporting.* Monthly reports shall be submitted to the ERO indicating the construction phase and off-road equipment information used during each phase including the information required in A(4). In addition, for off-road equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used.

Within six months of the completion of construction activities, the project sponsor shall submit to the ERO a final report summarizing construction activities. The final report shall indicate the start and end dates and duration of each construction phase. For each phase, the report shall include detailed

information required in A(4). In addition, for off-road equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used.

- C. *Certification Statement and On-site Requirements.* Prior to the commencement of construction activities, the project sponsor must certify (1) compliance with the Plan, and (2) all applicable requirements of the Plan have been incorporated into contract specifications.

## Operational Air Quality Impacts

An Air Quality Technical Report was prepared for the proposed project to address potential air quality impacts resulting from implementation of the project.<sup>58</sup> The proposed project would result in direct emissions from operation of the 18 new diesel backup generators of criteria air pollutants. It is assumed that due to the installation of 18 new generators, the project site would be able to accommodate market demand for backup power redundancy allowing the project sponsor to accommodate higher energy lessee(s) from conversion of existing suites and vacant suites (five suites) (discussed in the Greenhouse Gas Emissions and Mineral and Energy Resources sections of the Initial Study). The following summarizes information from the Air Quality Technical Report and addresses air quality impacts resulting from operation of the proposed project. The project sponsor has indicated that proposed backup generators would most likely be equivalent to a Cummins 2000 DQKAB model. The Cummins engine is rated 2922 brake-horsepower (bhp) with uncontrolled emission factors of 3.6 grams per bhp-hr (g/bhp-hr) for NO<sub>x</sub>, 0.2 g/bhp-hr for ROG, and 0.09 g/bhp-hr for PM<sub>10</sub>/PM<sub>2.5</sub>.

The BAAQMD through their New Source Review (Regulation 2, Rule 5) permitting process limits testing to no more than 50 hours per year per diesel backup generator, limits the excess cancer risk from any facility to no more than ten per one million population and requires any source that would result in an excess cancer risk greater than one per one million population to install Best Available Control Technology for Toxics. Proposed diesel backup generators would be subject to, and be required to comply with, BAAQMD Regulation 2, Rules 2 and 5. In order to meet the requirements of these rules, each proposed diesel backup generator would be limited to an annual operating hour of 35 hours per year for testing and maintenance and be equipped with a Level 3 VDECS, resulting in an 85 percent reduction in PM emissions. The following addresses operational air quality impacts of the proposed project.

**Impact AQ-3: During project operations, the proposed project would result in emissions of criteria air pollutants, but not at levels that would violate an air quality standard, contribute to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants. (Less than Significant)**

The proposed project would result in direct emissions from operation of the 18 new diesel backup generators, and to a lesser extent from any new vehicle trips generated by additional employees. Any additional employees (maximum of 25 new employees) and associated 18 daily vehicle trips resulting from the lease of up to five converted/new suites would result in a negligible increase in criteria air pollutant emissions and are therefore not quantified. Table 6 displays the proposed project's ROG, NO<sub>x</sub>, and PM emissions from 18 new diesel backup generators. None of the proposed project's average daily or annual emissions would exceed the

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<sup>58</sup> BlueScape Environmental, *Air Quality Technical Report for 200 Paul Avenue, San Francisco, California*, June 2013. This document is available at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, 94103 as part of Case File No. 2012.0153E.



operational significance thresholds for criteria air pollutants. Therefore, the proposed project would result in less than significant impact with respect to criteria air pollutants.

**Table 6 - 200 Paul Criteria Air Pollutant Emission Estimates compared to Significance Thresholds**

Pollutant	Project Emissions		Operational Thresholds	
	Average Daily Emissions (lbs./day)	Annual Maximum Emissions (tons/year)	Average Daily Emissions (lbs./day)	Annual Maximum Emissions (tons/year)
ROG	2.1	0.39	54	10
NO <sub>x</sub>	40	7.3	54	10
PM <sub>10</sub> <sup>a</sup>	0.15	0.027	82	15
PM <sub>2.5</sub> <sup>a</sup>	0.15	0.027	54	10
<i>Notes:</i> a. PM <sub>2.5</sub> is assumed equivalent to PM <sub>10</sub> for combustion emissions. Both are assumed to equal PM as provided in the diesel backup generators 2013 EPA Tier 2 Exhaust Emission Compliance Statement.				

It is anticipated that actual criteria air pollutant emissions would be less than those reported because engine run logs provided by the project sponsor for the 17 existing diesel backup generators indicate that these engines typically run for fewer than 35 hours per year for not only testing and maintenance, but also under emergency situations (i.e., in cases of power outages).

**Impact AQ-4: The proposed project would generate toxic air contaminants, including diesel particulate matter, which would expose sensitive receptors to substantial air pollutant concentrations. (Less than Significant with Mitigation)**

The proposed project would generate TACs and DPM from the operation of up to 18 new diesel backup generators, and to a lesser extent new vehicle trips. The project site is located in an area that already experiences poor air quality and the nearest sensitive receptors to the project site are the residences on the south side of Paul Avenue, approximately 60 feet south of the project site.<sup>59</sup> Other nearby sensitive receptors include residences on the north side of Egbert Avenue, approximately 330 feet north of the project site, and residences on the west side of Third Street across the Caltrain tracks, approximately 390 feet east of the project site.

As discussed above in Impact AQ-3, the proposed project has the potential to generate up to 25 employees, resulting in six new vehicle trips per shift. These new vehicle trips would result in a negligible increase in emissions and are therefore not quantified.

However, operation of up to 18 new diesel generators would result in a substantial increase DPM and other TACs. As shown in Table 6 above, the proposed project is estimated to generate 0.027 tons per year (55 lbs per year) of PM<sub>2.5</sub> emissions. Therefore, operation of the proposed project would expose sensitive receptors to substantial air pollutant concentrations, resulting in a significant impact. Implementation of **Mitigation**

<sup>59</sup> The distance between the residences and the nearest stack is over 300 feet.

**Measure M-AQ-4: Retrofit of Existing Diesel Backup Generators**, below, would reduce the magnitude of this impact to a less-than-significant level. The four existing diesel backup generators specified for retrofits emit approximately 0.041 tons per year (81 lbs per year) of PM<sub>2.5</sub>. Retrofitting these generators with a Level 3 VDECS would reduce PM<sub>2.5</sub> emissions from these existing generators by 0.034 tons per year (69 lbs per year). With implementation of M-AQ-4, the proposed project would result in a net reduction of approximately 0.007 tons per year (14 lbs per year) of PM<sub>2.5</sub> emissions. Therefore, with implementation of M-AQ-4, below, the proposed project's impact to nearby sensitive receptors would be reduced to less than significant with mitigation.

**M-AQ-4: Retrofit of Existing Diesel Backup Generators**

The project sponsor or property owner shall retrofit four existing diesel backup generators, referenced as generators S-18, S-19, S-20, and S-21 in its Bay Area Air Quality Management District February 1, 2013 Permit to Operate, with a California Air Resources Board Level 3 Verified Diesel Emissions Control Strategy. A schedule for the retrofitting of these generators prior to or simultaneously with installation of any of the additional diesel backup generators at the project site shall be submitted for the review and approval of the Planning Department prior to the installation of the first generator. The schedule shall be developed so that there shall not be a net increase in emissions at any time during the phased installation of the additional generators.

**Impact AQ-5: The proposed project would not conflict with, or obstruct implementation of, the 2010 Clean Air Plan. (Less than Significant)**

The most recently adopted air quality plan for the SFBAAB is the *2010 Clean Air Plan*. The *2010 Clean Air Plan* is a road map that demonstrates how the San Francisco Bay Area will achieve compliance with the state ozone standards as expeditiously as practicable and how the region will reduce the transport of ozone and ozone precursors to neighboring air basins. In determining consistency with the *2010 Clean Air Plan* (CAP), this analysis considers whether the project would: (1) support the primary goals of the CAP, (2) include applicable control measures from the CAP, and (3) avoid disrupting or hindering implementation of control measures identified in the CAP.

To meet the primary goals, the CAP recommends specific control measures and actions. These control measures are grouped into various categories and include stationary and area source measures, mobile source measures, transportation control measures, land use measures, and energy and climate measures. The CAP recognizes that to a great extent, community design dictates individual travel mode, and that a key long-term control strategy to reduce emissions of criteria pollutants, air toxics, and greenhouse gases from motor vehicles is to channel future Bay Area growth into vibrant urban communities where goods and services are close at hand, and people have a range of viable transportation options. To this end, the *2010 Clean Air Plan* includes 55 control measures aimed at reducing air pollution in the SFBAAB.

The measures most applicable to the proposed project are transportation control measures and energy and climate control measures. The proposed project's impact with respect to GHGs are discussed in the Greenhouse Gas Emissions section, which demonstrates that the proposed project would comply with the applicable provisions of the City's Greenhouse Gas Reduction Strategy.

The proposed project's anticipated six net new vehicle trips per shift would result in a negligible increase in air pollutant emissions. Furthermore, the proposed project would be generally consistent with the General Plan, as discussed in the Land Use and Land Use Planning section on p.24. Transportation control measures that are

identified in the *2010 Clean Air Plan* are implemented by the General Plan and the Planning Code, for example, through the City's Transit First Policy, bicycle parking requirements, and transit impact development fees. Compliance with these requirements would ensure the project includes relevant transportation control measures specified in the *2010 Clean Air Plan*.

Examples of a project that could cause the disruption or delay of *Clean Air Plan* control measures are projects that would preclude the extension of a transit line or bike path, or projects that propose excessive parking beyond parking requirements. The proposed project would alter an existing ISE and construction would occur entirely within existing property boundaries. It would not preclude the extension of a transit line or a bike path or any other transit improvement, and thus would not disrupt or hinder implementation of control measures identified in the CAP.

For the reasons described above, the proposed project would not interfere with implementation of the *2010 Clean Air Plan*, and because the proposed project would be consistent with the applicable air quality plan that demonstrates how the region will improve ambient air quality and achieve the state and federal ambient air quality standards, this impact would be less than significant.

**Impact AQ-6: The proposed project would not create objectionable odors that would affect a substantial number of people. (Less than Significant)**

Typical odor sources of concern include wastewater treatment plants, sanitary landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing facilities, fiberglass manufacturing facilities, auto body shops, rendering plants, and coffee roasting facilities. The proposed ISE would not be anticipated to generate objectionable odors. Therefore, odor impacts would be less than significant.

**Impact C-AQ-1: The proposed project, in combination with past, present, and reasonably foreseeable future development in the project area would contribute to cumulative air quality impacts. (Less than Significant with Mitigation)**

As discussed above, regional air pollution is by its very nature largely a cumulative impact. Emissions from past, present, and future projects contribute to the region's adverse air quality on a cumulative basis. No single project by itself would be sufficient in size to result in regional nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulative adverse air quality impacts.<sup>60</sup> The project-level thresholds for criteria air pollutants are based on levels by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants. Therefore, because the proposed project's construction (Impact AQ-1) and operational (Impact AQ-3) emissions would not exceed the project-level thresholds for criteria air pollutants, the proposed project would not be considered to result in a cumulatively considerable contribution to regional air quality impacts.

As discussed above, the project site is located in an area that already experiences poor air quality. Although the project would add new sources of TACs (e.g., construction activities, new vehicle trips, and stationary sources) within an area already adversely affected by air quality, the proposed project would include Mitigation Measures M-AQ-2 and M-AQ-4. **Mitigation Measure M-AQ-2: Construction Emissions Minimization** could reduce construction period emissions by as much as 94 percent. **Mitigation Measure M-**

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<sup>60</sup> BAAQMD, 2011, page 2-1.

**AQ-4: Retrofit of Existing Diesel Backup Generators**, which requires retrofitting four existing diesel backup generators with Level 3 VDECS, would reduce PM emissions by at least 85 percent and would result in a net decrease of particulate matter emissions at the project site. Compliance with these two mitigation measures would ensure that the proposed project would not result in a considerable contribution to cumulative air quality impacts.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
<b>E.8. Greenhouse Gas Emissions (GHG)</b>					
Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Environmental Setting

Gases that trap heat in the atmosphere are referred to as greenhouse gases (GHGs) because they capture heat radiated from the sun as it is reflected back into the atmosphere, much like a greenhouse does. The accumulation of GHGs has been implicated as the driving force for global climate change. The primary GHGs are carbon dioxide (CO<sub>2</sub>), black carbon, methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), ozone, and water vapor.

Individual projects contribute to the cumulative effects of climate change by emitting GHGs during demolition, construction, and operational phases. While the presence of the primary GHGs in the atmosphere is naturally occurring, CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O are largely emitted from human activities, accelerating the rate at which these compounds occur within earth's atmosphere. Emissions of CO<sub>2</sub> are largely by-products of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices and landfills. Black carbon has recently emerged as a major contributor to global climate change, possibly second only to CO<sub>2</sub>. Black carbon is produced naturally and by human activities as a result of the incomplete combustion of fossil fuels, biofuels and biomass.<sup>61</sup> N<sub>2</sub>O is a byproduct of various industrial processes and has a number of uses, including use as an anesthetic and as an aerosol propellant. Other GHGs include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes. Greenhouse gases are typically reported in "carbon dioxide-equivalent" measures (CO<sub>2</sub>E).<sup>62</sup>

There is international scientific consensus that human-caused increases in GHGs have and will continue to contribute to global warming. Many impacts resulting from climate change, including increased fires, floods, severe storms and heat waves, already occur and will only become more frequent and costly.<sup>63</sup> Secondary effects of climate change are likely to include a global rise in sea level, impacts to agriculture, the state's

<sup>61</sup> Center for Climate and Energy Solutions, *What is Black Carbon?*, April 2010. Available online at: <http://www.c2es.org/docUploads/what-is-black-carbon.pdf>. Accessed September 27, 2012.

<sup>62</sup> Because of the differential heat absorption potential of various GHGs, GHG emissions are frequently measured in "carbon dioxide-equivalents," which present a weighted average based on each gas's heat absorption (or "global warming") potential.

<sup>63</sup> California Climate Change Portal. Available online at: <http://www.climatechange.ca.gov>. Accessed September 25, 2012.

electricity system, and native freshwater fish ecosystems, an increase in the vulnerability of levees in the Sacramento-San Joaquin Delta, changes in disease vectors, and changes in habitat and biodiversity.<sup>64,65</sup>

**Greenhouse Gas Emission Estimates and Energy Providers in California.** The California Air Resources Board (ARB) estimated that in 2010 California produced approximately 451.60 million metric tons of CO<sub>2</sub>E (MTCO<sub>2</sub>E).<sup>66</sup> The ARB found that transportation is the source of 38 percent of the State's GHG emissions, followed by electricity generation (both in-state generation and imported electricity) at 21 percent and industrial sources at 19 percent. Commercial and residential fuel use (primarily for heating) accounted for 10 percent of GHG emissions.<sup>67</sup> In San Francisco, on-road transportation (vehicles on highways, city streets and other paved roads) and natural gas (consumption for residential, commercial, and industrial use) sectors were the two largest sources of GHG emissions accounting for 40 percent (2.1 million MTCO<sub>2</sub>E) and 29 percent (1.5 million MTCO<sub>2</sub>E), respectively, of San Francisco's 5.3 million MTCO<sub>2</sub>E emitted in 2010. Electricity consumption (residential, commercial, municipal buildings and BART and Muni transportation systems) accounts for approximately 25 percent (1.3 million MTCO<sub>2</sub>E) of San Francisco's GHG emissions.<sup>68</sup>

Electricity in San Francisco is currently primarily provided by PG&E and the San Francisco Public Utilities Commission (SFPUC). In 2010, electricity consumption in San Francisco was approximately 6.1 million megawatt-hours (MWh), accounting for approximately 25 percent (1.3 million MTCO<sub>2</sub>E) of San Francisco's total 2010 GHG emission emissions. Of those totals, PG&E is responsible for approximately 73 percent of electricity delivery (4.5 million MWh) and 79 percent (1.1 million MTCO<sub>2</sub>E) of GHG emissions, and the SFPUC is responsible for approximately 14 percent (0.9 million MWh) of electricity delivery and 0.01 percent (12,489 MTCO<sub>2</sub>E) of GHG emissions.<sup>69</sup>

In 2010, PG&E total power mix was as follows: 20 percent natural gas, 24 percent nuclear, 16 percent eligible renewables (described below), 16 percent large hydroelectric, 23 percent unspecified power, one percent coal, and one percent other fossil fuels.<sup>70</sup> Pending California Public Utilities Commission approval, PG&E would include a "Green Option" program that would allow customers an opportunity to pay into a program that may lead to the development of up to 250 MW of new clean energy projects in the PG&E service area.<sup>71</sup>

Energy supplies for the SFPUC are currently provided by the three hydroelectric power plants that the SFPUC owns and operates in association with San Francisco's Hetch Hetchy system. This system has the lowest GHG

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<sup>64</sup> California Climate Change Portal. Available online at: <http://www.climatechange.ca.gov>. Accessed September 25, 2012.

<sup>65</sup> California Energy Commission, California Climate Change Center, *Our Changing Climate 2012*, July 2012. Available online at: <http://www.energy.ca.gov/2012publications/CEC-500-2012-007/CEC-500-2012-007.pdf>. Accessed August 21, 2012.

<sup>66</sup> California Air Resources Board (ARB), "California Greenhouse Gas Inventory for 2000-2010— by Category as Defined in the Scoping Plan." Available online at: [http://www.arb.ca.gov/cc/inventory/data/tables/ghg\\_inventory\\_scopingplan\\_00-10\\_2013-02-19.pdf](http://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scopingplan_00-10_2013-02-19.pdf). Accessed June 5, 2013.

<sup>67</sup> Ibid.

<sup>68</sup> San Francisco Department of Environment (DOE), "San Francisco Community-Wide Carbon Emissions by Category." Excel spreadsheet provided via email between Pansy Gee, DOE and Wade Wietgreffe, San Francisco Planning Department. June 7, 2013.

<sup>69</sup> Ibid. Note: the remainder of the electricity consumption is derived from third party generators or other suppliers.

<sup>70</sup> Pacific Gas & Electric (PG&E), "PG&E's 2010 Electric Power Mix Delivered to Retail Customers." Available online at: <http://www.pge.com/myhome/edusafety/systemworks/electric/energymix/>. Accessed June 10, 2013 (2013a).

<sup>71</sup> PG&E, "New Green Option (Community Solar) FAQ." Available online at: <http://www.pge.com/about/environment/pge/greenoption/faq/>. Accessed June 10, 2013 (2013b).

emissions of any large electric utility in California and currently supplies electricity for use by Muni, city buildings, and a limited number of other commercial accounts.<sup>72</sup>

Starting in late 2013, San Francisco's community choice aggregation program, CleanPowerSF, is estimated to begin service by providing 100 percent California-certified renewable energy, which may include purchases of renewable energy credits. During phase one of CleanPowerSF, the program anticipates 20 to 30 MW of power designed to provide sufficient electricity for approximately 50,000 to 90,000 San Francisco residential accounts. Commercial customers are not allowed to enroll in CleanPowerSF, however, subsequent phases of CleanPowerSF may allow commercial electricity customers to be included in the program. CleanPowerSF will be administered by the SFPUC (operated separately from the above mentioned SFPUC Hetch Hetchy system accounts) and PG&E will continue to transmit, distribute, and own the City's electricity grid.<sup>73</sup>

**Data Centers.** Due to concerns over the rapid growth in data center energy consumption and interest in energy efficiency opportunities for data centers, Congress passed Public Law 109-431, directing the United States Environmental Protection Agency (USEPA) to study data center energy use, equipment, and opportunities for energy efficiency. According to *Report to Congress on Server and Data Center Energy Efficiency – Public Law 109-431 (Report to Congress)*, US data centers consumed 61 million MWh of energy in 2006, which equates to 1.5 percent of all power consumed in the US. Energy use of US data centers in 2006 was estimated to be more than double their energy consumption in 2000 and was expected to double again by 2011. The USEPA in the report acknowledged that data centers “can also lead to indirect reductions in energy use in the broader economy, which can exceed the incremental data center energy expenditures in some cases. For instance, e-commerce and telecommuting can reduce both freight and passenger transportation energy use.”<sup>74</sup> However, the USEPA does not quantify the indirect energy use reductions.

Power Usage Effectiveness, or PUE, is a metric used to compare the efficiency of facilities that house computer servers. PUE is defined as the ratio of total facility energy use to IT equipment power draw (i.e.,  $PUE = \text{Total Facility Power} / \text{IT Equipment Power}$ ). For example a PUE of two (2) means that the data center must draw two (2) watts of electricity for every one (1) watt of power consumed by the IT equipment. The ideal PUE is one (1) where all power drawn by the facility goes to the IT equipment (or lower if on-site electricity is generated).

A review of three different surveys found that the average PUE for data centers range between 1.8 to 1.89, 2.0, and 2.8.<sup>75</sup> The USEPA, in their *Report to Congress*, identified three different energy-efficiency savings categories for data centers: (1) Improved Operation, with a PUE of 1.7; (2) Best Practice, with a PUE 1.5; and (3) State-of-the-Art, with a PUE of 1.5 or 1.4, depending on the type of data center. Based on the most comprehensive of the aforementioned surveys, the *Uptime Institute 2012 Data Center Industry Survey*, approximately 33 percent of

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<sup>72</sup> San Francisco Public Utilities Commission (SFPUC), “Agenda Item No 20, Adopt an Enforcement Program as required under the California Renewable Energy Resources Act,” December 13, 2011. Available online at: [http://www.energy.ca.gov/portfolio/rps\\_pou\\_reports.html](http://www.energy.ca.gov/portfolio/rps_pou_reports.html). Accessed June 10, 2013.

<sup>73</sup> SFPUC, “Agenda Item No 13, CleanPowerSF Not-to-Exceed Electric Generation Rates,” May 14, 2013. Available online at: <http://www.sfwater.org/modules/showdocument.aspx?documentid=3780>. Accessed June 10, 2013.

<sup>74</sup> United States Environmental Protection Agency (USEPA), *Report to Congress on Server and Data Center Energy Efficiency – Public Law 109-431*, August 2, 2007. Available online at: [http://hightech.lbl.gov/documents/data\\_centers/epa-datacenters.pdf](http://hightech.lbl.gov/documents/data_centers/epa-datacenters.pdf). Accessed June 11, 2013.

<sup>75</sup> First numbers: Matt Stansberry & Julian Kudrinski, Uptime Institute, *Uptime Institute 2012 Data Center Industry Survey*. Survey of over 1,100 data center end users across the world. Available online at: <http://uptimeinstitute.com/2012-survey-results>. Accessed June 11, 2013; Second number: USEPA, 2007. Survey of 22 data centers, with a majority located on the west coast in the US; Third number: Digital Realty, “US Campos Survey Results,” January 2012. Survey of 300 data centers in the US.

data centers would meet the Improved Operation category (i.e., PUE of 1.69 or lower), approximately 15 percent of data centers would meet the Best Practice category (i.e., PUE of 1.49 or lower), and approximately 10 percent would meet the State-of-the-Art category (i.e., PUE of 1.39 or lower). The project sponsor recorded a PUE of 1.51 and 1.45 for two existing suites at the project site during full energy load on a single day or two.

## Regulatory Setting

### State

**Executive Order S-3-05.** In 2005, in recognition of California's vulnerability to the effects of climate change, then-Governor Schwarzenegger established Executive Order (EO) S-3-05, which sets forth a series of target dates by which statewide emissions of GHGs would be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels (approximately 457 million MTCO<sub>2</sub>E); by 2020, reduce emissions to 1990 levels (estimated at 427 million MTCO<sub>2</sub>E); and by 2050 reduce statewide GHG emissions to 80 percent below 1990 levels (approximately 85 million MTCO<sub>2</sub>E). As discussed in the Environmental Setting section, California produced about 452 million MTCO<sub>2</sub>E in 2010, thereby meeting the 2010 target date to reduce GHG emissions to 2000 levels.

**Assembly Bill 32 and California Climate Change Scoping Plan.** In 2006, the California legislature passed AB 32 (California Health and Safety Code Division 25.5, Sections 38500, et seq.), also known as the California Global Warming Solutions Act. AB 32 requires ARB to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020.

Pursuant to AB 32, ARB adopted a Scoping Plan in December 2008, outlining measures to meet the 2020 GHG reduction limits. In order to meet these goals, California must reduce its GHG emissions by 30 percent below projected 2020 business-as-usual emissions levels, or about 15 percent from 2008 levels.<sup>76</sup> The Scoping Plan estimates a reduction of 174 million MTCO<sub>2</sub>E from the transportation, energy, agriculture, forestry, and high global warming potential sectors (see Table 1: GHG Reductions from the AB 32 Scoping Plan Sectors).<sup>77</sup>

**Table 7 - GHG Reductions from the AB 32 Scoping Plan Sectors<sup>78,79</sup>**

GHG Reduction Measures by Sector	GHG Reductions (million MTCO <sub>2</sub> E)
Transportation Sector	62.3
Electricity and Natural Gas	49.7
Industry	1.4
Landfill Methane Control Measure (Discrete Early Action)	1
Forestry	5
High Global Warming Potential GHGs	20.2

<sup>76</sup> ARB, "California's Climate Plan: Fact Sheet." Available online at: [http://www.arb.ca.gov/cc/facts/scoping\\_plan\\_fs.pdf](http://www.arb.ca.gov/cc/facts/scoping_plan_fs.pdf). Accessed August 23, 2012 (2012a).

<sup>77</sup> Ibid.

<sup>78</sup> ARB, *Climate Change Scoping Plan*, December 2008. Available online at: [http://www.arb.ca.gov/cc/scopingplan/document/adopted\\_scoping\\_plan.pdf](http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf). Accessed August 23, 2012.

<sup>79</sup> ARB, 2012a.

GHG Reduction Measures by Sector	GHG Reductions (million MTCO <sub>2</sub> E)
Additional Reductions Needed to Achieve the GHG Cap	34.4
<b>Total Reductions Counted Towards 2020 Target</b>	<b>174</b>
<b>Other Recommended Measures</b>	
Government Operations	1-2
Agriculture - Methane Capture at Large Dairies	1
Additional GHG Reduction Measures:	
Water	4.8
Green Buildings	26
High Recycling/ Zero Waste	9
-Commercial Recycling, Composting, Anaerobic Digestion, Extended Producer Responsibility, Environmentally Preferable Purchasing	
<b>Total Reductions from Other Measures</b>	<b>41.8-42.8</b>
<i>Note:</i> MTCO <sub>2</sub> E = metric tons of CO <sub>2</sub> E (carbon dioxide equivalent)	

ARB has identified an implementation timeline for the GHG reduction strategies in the Scoping Plan.<sup>80</sup> Some measures may require new legislation to implement, some will require subsidies, some have already been developed, and some will require additional effort to evaluate and quantify. Additionally, some emissions reductions strategies may require their own environmental review under CEQA or the National Environmental Policy Act.

One of the AB 32 Scoping Plan strategies, a cap-and-trade program, went into effect January 1, 2012, with enforcement obligations in 2013. Under cap-and-trade, an overall limit on GHG emissions from capped sectors will be established by the cap-and-trade program and facilities subject to the cap (high direct GHG emitters) will be able to trade permits (allowances) to emit GHGs.

The AB 32 Scoping Plan also anticipates that local government actions will result in reduced GHG emissions. ARB has identified a GHG reduction target of 15 percent from 2008 levels for local governments themselves and noted that successful implementation of the plan relies on local governments' land use planning and urban growth decisions because local governments have the primary authority to plan, zone, approve, and permit land development to accommodate population growth and the changing needs of their jurisdictions.<sup>81</sup> The Scoping Plan also relies on the requirements of Senate Bill (SB) 375 (discussed below) to align local land use and transportation planning for achieving GHG reductions.

The Scoping Plan must be updated every five years to evaluate the mix of AB 32 policies to ensure that California is on track to achieve the 2020 GHG reduction goal. In early 2013, ARB initiated activities to update the AB 32 Scoping Plan. The 2013 AB 32 Scoping Plan update will define ARB's climate change priorities for

<sup>80</sup> ARB, "Assembly Bill 32: Global Warming Solutions Act." Available online at: <http://www.arb.ca.gov/cc/ab32/ab32.htm/>. Accessed August 22, 2012.

<sup>81</sup> ARB, 2008.



the next five years and lay the groundwork to reach post-2020 goals set forth in EO S-3-05. The update will highlight California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan (2008). It will also evaluate how to align the State's longer-term GHG reduction strategies with other State policy priorities, such as for water, waste, natural resources, clean energy and transportation, and land use. To address the State's near-term and longer-term GHG goals, the update will have both a 2020 element and a post-2020 element. The 2020 element will focus on State, regional, and local initiatives that are being implemented now to assist California in meeting the 2020 goal. The post-2020 element will provide a high level view of a long-term strategy for meeting the 2050 GHG goals.<sup>82</sup>

**Senate Bill 375.** In addition to policy directly guided by AB 32, the California legislature passed SB 375 in September 2008 to require regional coordination in land use and transportation planning and funding to help meet the AB 32 GHG reduction goals. SB 375 aligns regional transportation planning efforts, regional GHG emissions reduction targets, and land use and housing allocations. SB 375 requires regional transportation plans developed by each of the State's 18 Metropolitan Planning Organizations (MPOs) to incorporate a "sustainable communities strategy (SCS)" in each regional transportation plan that will achieve GHG emission reduction targets set by ARB. SB 375 also includes provisions for streamlined CEQA review for some infill projects such as transit-oriented development. The Bay Area's Metropolitan Transportation Commission's 2013 Regional Transportation Plan, Plan Bay Area (expected to be adopted in July 2013), is the region's first plan subject to SB 375.

ARB, in consultation with MPOs, provided each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. The Bay Area's per-capita GHG emission reduction targets are seven percent reduction by 2020 and a 15 percent reduction by 2035 from 2005 levels. These reduction targets will be updated every eight years, but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets. ARB is also charged with reviewing each MPO's SCS or "alternative planning strategy" for consistency with its assigned targets. If MPOs do not meet the GHG emissions reduction targets, transportation projects would not be eligible for funding programmed after January 1, 2012.

SB 375 also extends the minimum time period for the Regional Housing Needs Allocation cycle from five years to eight years for local governments located within an MPO that meets certain requirements. City and county land use policies (including general plans) are not required to be consistent with the regional transportation plan (and associated SCS or alternative planning strategy). However, SB 375 added new CEQA provisions that intend to incentivize qualified projects that are consistent with the approved strategy, categorized as "transit priority projects."

**Senate Bill 1078, 107, and X1-2 and Executive Order S-14-08 and S-21-09.** California established aggressive Renewable Portfolio Standards under SB 1078 (Chapter 516, Statutes of 2002) and SB 107 (Chapter 464, Statutes of 2006), which require retail sellers of electricity, to provide at least 20 percent of their electricity supply from renewable sources by 2010. EO S-14-08 of November 2008 expanded the State's Renewable Portfolio Standard to 33 percent of electricity from renewable sources by 2020. In September 2009, then-Governor Schwarzenegger continued California's commitment to the Renewable Portfolio Standard by signing EO S-21-

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<sup>82</sup> ARB, "AB 32 Scoping Plan," July 3, 2013. Available online at: <http://www.arb.ca.gov/cc/scopingplan/scopingplan.htm>. Accessed July 16, 2013.

09, which directed ARB under its AB 32 authority to enact regulations to help California meet the Renewable Portfolio Standard goal of 33 percent renewable energy by 2020.<sup>83</sup>

In the ongoing effort to codify the GHG reduction goal for energy suppliers of 33 percent by 2020, SB X1-2 (Chapter 1, Statutes of 2011) was signed by Governor Edmund G. Brown, Jr., in April 2011. This Renewable Portfolio Standard preempts the ARB's 33 percent renewable electricity standard and applies to all electricity suppliers in the state including publicly owned utilities, investor-owned utilities, electricity service providers, and community choice aggregators. All of these entities must adopt the new Renewable Portfolio Standards goals of 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.<sup>84</sup> Eligible renewable sources include geothermal, ocean wave, solar photovoltaic, wind, but exclude large hydroelectric (30 MW or more). A specific provision in SB X1-2 also requires "a local publicly owned electric utility in a city and county that only receives greater than 67 percent of its electricity sources from hydroelectric generation located within the state that it owns and operates to procure eligible renewable energy resources, including renewable energy credits, to meet only the electricity demands unsatisfied by its hydroelectric generation in any given year, in order to satisfy its renewable energy procurement requirements."

As a result of SB X1-2, the SFPUC as a local publicly owned utility will be required to meet 100 percent of its energy needs from a combination of its hydroelectric Hetch Hetchy resources and renewable energy resources.<sup>85</sup> In addition, the City and County of San Francisco established a community choice aggregation program, CleanPowerSF, which will be subject to SB X1-2 requirements when it is set to come online in late 2013. PG&E, an investor-owned utility, provided customers with 16 percent eligible renewables of its total power mix in 2010.<sup>86</sup>

**Senate Bill 97.** SB 97 required the Office of Planning and Research (OPR) to amend the state CEQA guidelines to address the feasible mitigation of GHG emissions or the effects of GHGs. In response, OPR amended the CEQA Guidelines to provide guidance for analyzing GHG emissions. Section 15064.4 of CEQA Guidelines states that in assessing the significance of GHG emissions, a lead agency should consider the extent to which the project may affect emissions levels; whether emissions exceed an applicable threshold of significance; and whether the project complies with regulations or requirements adopted to implement statewide, regional, or local plans to reduce GHG emissions. In addition, the amendments added a new section to the CEQA Checklist (CEQA Guidelines Appendix G) to address questions regarding the project's potential to emit GHGs.

## Regional

The Bay Area Air Quality Management District (BAAQMD) is the primary agency responsible for air quality regulation in the nine county San Francisco Bay Area Air Basin (SFBAAB). The BAAQMD, through their CEQA Air Quality Guidelines, provides guidance for projects subject to CEQA in the SFBAAB. The BAAQMD is responsible for attaining and maintaining air quality in the SFBAAB within federal and state air quality standards, as established by the federal Clean Air Act (CAA) and the California Clean Air Act (CCAA),

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<sup>83</sup> California Energy Commission, "Renewables Portfolio Standard (RPS) Proceeding," Available online at: <http://www.energy.ca.gov/portfolio/>. Accessed June 10, 2013.

<sup>84</sup> Ibid.

<sup>85</sup> SFPUC, 2013.

<sup>86</sup> PG&E, 2013a.

respectively. The CAA and the CCAA require plans to be developed for areas that do not meet air quality standards, generally. The most recent air quality plan, the 2010 Clean Air Plan, was adopted by the BAAQMD on September 15, 2010. The 2010 Clean Air Plan includes a goal of reducing GHG emission to 1990 levels by 2020 and 40 percent below 1990 levels by 2035.

The BAAQMD also assists local jurisdictions and lead agencies in complying with the requirements of CEQA regarding potentially adverse impacts to air quality in their CEQA Air Quality Guidelines. The BAAQMD advises that local agencies may consider adopting a Greenhouse Gas Reduction Strategy consistent with AB 32 goals and that subsequent projects be reviewed to determine the significance of their GHG emissions based on the degree to which that project complies with a Greenhouse Gas Reduction Strategy.<sup>87</sup> As described below, this is consistent with the approach to analyzing GHG emissions outlined in the CEQA Guidelines.

In addition, BAAQMD established a climate protection program to reduce pollutants that contribute to global climate change and affect air quality in the SFBAAB. The climate protection program includes measures that promote energy efficiency, reduce vehicle miles traveled, and develop alternative sources of energy, all of which assist in reducing GHGs and other air pollutants that affect the health of residents. BAAQMD also seeks to support current climate protection programs in the region and to stimulate additional efforts through public education and outreach, technical assistance to local governments and other interested parties, and promotion of collaborative efforts among stakeholders.<sup>88</sup>

## Local

**San Francisco Greenhouse Gas Reduction Ordinance.** In May 2008, the City adopted Ordinance No. 81-08 amending the San Francisco Environment Code to establish GHG emissions targets and departmental action plans, to authorize the San Francisco Department of the Environment to coordinate efforts to meet these targets, and to make environmental findings. The ordinance establishes the following GHG emissions reduction limits for San Francisco and the target dates by which to achieve them: determine 1990 Citywide GHG emissions by 2008, the baseline level with reference to which target reductions are set; reduce GHG emissions by 25 percent below 1990 levels by 2017; reduce GHG emissions by 40 percent below 1990 levels by 2025; and reduce GHG emissions by 80 percent below 1990 levels by 2050.

**San Francisco Greenhouse Gas Reduction Strategy.** San Francisco has developed a number of plans and programs to reduce the City's contribution to global climate change and meet the goals of the San Francisco Greenhouse Gas Reduction Ordinance. San Francisco's Greenhouse Gas Reduction Strategy documents the City's actions to pursue cleaner energy, energy conservation, alternative transportation and solid waste policies. As identified in San Francisco's Greenhouse Gas Reduction Strategy, the City has implemented a number of mandatory requirements and incentives that have measurably reduced GHG emissions including, but not limited to, increasing the energy efficiency of new and existing buildings, installation of solar panels on building roofs, implementation of a green building strategy, adoption of a zero waste strategy, a construction and demolition debris recovery ordinance, a solar energy generation subsidy, incorporation of alternative fuel vehicles in the City's transportation fleet (including buses), and a mandatory recycling and composting

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<sup>87</sup> BAAQMD, *California Environmental Quality Act Air Quality Guidelines*, May 2012. Available online at: [http://www.baaqmd.gov/-/media/Files/Planning%20and%20Research/CEQA/BAAQMD%20CEQA%20Guidelines\\_Final\\_May%202012.ashx?la=en](http://www.baaqmd.gov/-/media/Files/Planning%20and%20Research/CEQA/BAAQMD%20CEQA%20Guidelines_Final_May%202012.ashx?la=en). Accessed September 25, 2012.

<sup>88</sup> BAAQMD, "Climate Protection Program." Available online at: [http://www.baaqmd.gov/?sc\\_itemid=83004271-3753-4519-8B09-D85F3FC7AE70](http://www.baaqmd.gov/?sc_itemid=83004271-3753-4519-8B09-D85F3FC7AE70). Accessed August 23, 2012.

ordinance. The strategy also identifies 42 specific regulations for new development that would reduce a project's GHG emissions.

The Greenhouse Gas Reduction Strategy concludes that San Francisco's policies and programs have resulted in a reduction in GHG emissions below 1990 levels, exceeding statewide AB 32 GHG reduction goals. San Francisco's communitywide 1990 GHG emissions were approximately 6.2 million MTCO<sub>2</sub>E. As stated above, San Francisco GHG emissions in 2010 were 5.3 million MTCO<sub>2</sub>E, which represents a 14.5 percent reduction in GHG emissions compared to 1990 levels. The reduction is largely a result of reduced GHG emissions from the electricity sector, from 2.0 million MTCO<sub>2</sub>E (year 1990) to 1.3 million MTCO<sub>2</sub>E (year 2010), and waste sector, from 0.5 million MTCO<sub>2</sub>E (year 1990) to 0.2 million MTCO<sub>2</sub>E (year 2010).<sup>89</sup> The electricity sector reduction is a result of a cleaner electricity portfolio in the City, despite an increase in electricity consumption, including from the closure of the higher GHG-emitting Hunters Point Power Plant and Potrero Power Plant and completion of the lower GHG-emitting Trans Bay Cable project to Pittsburg, California.

**San Francisco Green Building Ordinance.** On August 4, 2008, San Francisco's Green Building Ordinance (Ordinance No. 180-08) became law for newly constructed residential and commercial buildings and renovations to existing buildings. The ordinance specifically requires newly constructed commercial buildings over 5,000 square feet, residential buildings over 75 feet in height, and renovations on buildings over 25,000 square feet to be subject to an unprecedented level of required LEED® Green Building Rating System™ requirements, the most stringent green building requirements in the nation at the time. In addition, green building standards are required for all newly constructed buildings, regardless of size or occupancy, as well as renovations to building areas greater than 25,000 square feet undergoing major structural, mechanical, or electrical upgrades. Cumulative benefits of this ordinance include reducing CO<sub>2</sub> emissions by 60,000 tons, saving 220,000 megawatt-hours of power, saving 100 million gallons of drinking water, reducing waste and stormwater by 90 million gallons, reducing construction and demolition waste by 700 million pounds, increasing the valuations of recycled materials by \$200 million, reducing 540,000 automobile trips, and increasing generation of green power by 37,000 megawatt-hours.<sup>90</sup>

**San Francisco Existing Commercial Buildings Energy Performance Ordinance.** In 2011, the City adopted Ordinance 17-11 requiring owners of nonresidential buildings in San Francisco to conduct energy efficiency audits, as well as to annually measure and disclose energy performance. The ordinance applies to nonresidential buildings greater than 10,000 square feet, with different requirements for buildings greater than 50,000 square feet. Certain exceptions apply for new construction and if specified performance criteria are met.

**San Francisco Conditional Uses.** A Conditional Use is a use that is not principally permitted in a particular Zoning District. Conditional Uses require a Planning Commission hearing in order to determine if the proposed use is necessary or desirable to the neighborhood, and whether the use complies with the San Francisco General Plan. Section 303 of the Planning Code establishes criteria for the Planning Commission Conditional Use process. Section 303(h) has further criteria for an ISE, such as the proposed project, that includes finding that:

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<sup>89</sup> DOE, 2013.

<sup>90</sup> These findings are contained within the final Green Building Ordinance, signed by the Mayor on August 4, 2008.

*(F) The building is designed to minimize energy consumption, such as through the use of energy-efficient technology, including without limitation, heating, ventilating and air conditioning systems, lighting controls, natural ventilation and recapturing waste heat, and as such commercially available technology evolves;*

*(G) The project sponsor has examined the feasibility of supplying and, to the extent feasible, will supply all or a portion of the building's power needs through on-site power generation, such as through the use of fuel cells or co-generation;*

*(H) The project sponsor shall have submitted design capacity and projected power use of the building as part of the conditional use application.*

In addition, as a condition of approval in Section 303(h), ISE project sponsors' are required to submit to the Planning Department on an annual basis power use statements for the previous twelve-month period as provided by all suppliers of utilities and shall submit a written annual report to the Department of Environment and the Planning Department which shall state, among other things, the annual energy consumption and fuel consumption of all tenants and occupants of the ISE.

### **Significance Criteria**

The thresholds for determining the significance of impacts in this analysis are consistent with the environmental checklist in Appendix G of the State CEQA Guidelines, as amended by SB 97, which is used by the San Francisco Planning Department. For the purpose of this analysis, the following significance criteria were used to determine whether implementing the proposed project would result in a significant impact with respect to GHG emissions. Implementation of the proposed project would have a significant effect on GHG emissions if the proposed project would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

### **Approach to Analysis**

GHG emissions and global climate change represent cumulative impacts. GHG emissions contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature; the combination of GHG emissions from past, present, and future projects contribute substantially to the phenomenon of global climate change and its associated environmental impacts. There does not currently appear to be a consensus in the scientific community as to when and under what circumstances a project's incremental contribution to climate change would be considered cumulatively considerable.

Consistent with CEQA Guidelines Section 15183.5, San Francisco has prepared its own Greenhouse Gas Reduction Strategy. The BAAQMD has reviewed San Francisco's Greenhouse Gas Reduction Strategy, concluding that "Aggressive GHG 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."<sup>91</sup>

For most land use projects within San Francisco, the GHG analysis includes a qualitative assessment of GHG emissions that would result from a proposed project and an assessment of the proposed project's compliance with San Francisco's Greenhouse Gas Reduction Strategy via a checklist of the City's 42 specific regulations that reduce GHG emissions. Given the proposed project's unique data center land use and the anticipated greater amount of GHG emissions associated with the land use compared to typical projects in San Francisco (e.g., residential, office, mixed-use), the impact analysis analyzes compliance with the checklist, but also quantifies construction- and operation-related GHG emissions that would result from the proposed project. As such, the determination as to whether a proposed project's GHG emissions are cumulatively considerable (i.e., generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment) is based upon whether the proposed project, and its associated GHG emissions, would conflict with EO S-3-05, AB 32, Bay Area 2010 Clean Air Plan, and San Francisco's GHG Reduction Ordinance (statewide, regional, and local plans and regulations). This approach is consistent with CEQA Guidelines Section 15064.4 and Appendix G. In addition, for informational purposes, project-related energy efficiency features and the PUE as an indicator of the proposed project's energy efficiency are provided.

Both construction- and operation-related GHG emissions were estimated in an Air Quality Technical Report prepared for the proposed project.<sup>92</sup> Construction-related GHG emissions are quantified for the proposed project using the California Emissions Estimator Model (CalEEMod) and annualized over the expected 40-year lifespan of the proposed project, consistent with anticipated lifetimes for new buildings. The model was developed, including default data (e.g., emission factors, meteorology, etc.) in collaboration with California air districts. Default assumptions were used where project-specific information was unknown.

Operation-related GHG emissions are quantified for the proposed project using several different sources. Annual GHG emissions from the proposed 18 new diesel backup generators are calculated using the rate of the fuel consumption as specified by the engine manufacturers, expected annual testing and maintenance operating hours, and emission factors from the Climate Registry General Reporting Protocol.<sup>93</sup> Annual GHG emissions from indirect electricity use are calculated using an anticipated increase in the amount of electricity consumption from the proposed project and a PG&E CO<sub>2</sub> emission factor of 0.178 MTCO<sub>2</sub>/MWh from 2011 (latest third-party verified year)<sup>94</sup> and eGrid CH<sub>4</sub> and N<sub>2</sub>O emission factors of 0.029 lbs/MWh and 0.0062 lbs/MWh, respectively.<sup>95</sup>

**Impact C-GG-1: The proposed project would generate greenhouse gas emissions, but not in 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)**

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<sup>91</sup> BAAQMD, "Letter from J. Roggenkamp, BAAQMD, to B. Wycko, San Francisco Planning Department," October 28, 2010. Available online at: [http://www.sf-planning.org/ftp/files/MEA/GHG-Reduction\\_Letter.pdf](http://www.sf-planning.org/ftp/files/MEA/GHG-Reduction_Letter.pdf). Accessed September 24, 2012.

<sup>92</sup> BlueScape Environmental, 2013.

<sup>93</sup> The Climate Registry, "General Reporting Protocol, Version 2.0," March 2013. Available online at: [http://www.theclimateregistry.org/downloads/2013/03/TCR\\_GRP\\_Version\\_2.0.pdf](http://www.theclimateregistry.org/downloads/2013/03/TCR_GRP_Version_2.0.pdf). Accessed June 13, 2013.

<sup>94</sup> PG&E, "Greenhouse Gas Emission Factors: Guidance for PG&E Customers," April 2013. Available online at: [http://www.pge.com/includes/docs/pdfs/shared/environment/calculator/pge\\_ghg\\_emission\\_factor\\_info\\_sheet.pdf](http://www.pge.com/includes/docs/pdfs/shared/environment/calculator/pge_ghg_emission_factor_info_sheet.pdf). Accessed June 12, 2013 (2013c).

<sup>95</sup> BlueScape Environmental, 2013.

The most common GHGs resulting from human activity associated with land use decisions are CO<sub>2</sub>, black carbon, CH<sub>4</sub>, and N<sub>2</sub>O.<sup>96</sup> Individual projects contribute to the cumulative effects of climate change by directly or indirectly emitting GHGs during construction and operational phases. Direct operational emissions include GHG emissions from new vehicle trips and area sources (natural gas combustion). 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 generate GHG emissions, both directly and indirectly. During construction, direct emissions would be generated from worker and vendor vehicle trips, hauling, and off-road equipment. During operation, direct emissions would mainly result from the operation of 18 new diesel backup generators. The proposed project would also indirectly generate GHG emissions resulting from an anticipated increase in electricity consumption. It is assumed that due to the installation of 18 new generators, the project site would be able to accommodate market demand for backup power redundancy allowing the project sponsor to accommodate higher energy lessee(s) from conversion of existing suites and vacant suites (five suites). The proposed project's estimated increased energy load would be 7 MW, equating to an estimated annual energy consumption of 61,320 MWh for these five suites. Any additional employees (maximum of 25 new employees) resulting from the lease of these five converted/new suites would result in a negligible increase in GHG emissions and are therefore not quantified.

### **Proposed Efficiency Measures and Power Usage Effectiveness**

In addition to efficiency features required by City regulations, the proposed project includes the following efficiency features that are intended to reduce the proposed project's energy usage, and thus associated GHG emissions from the five converted/new suites: computer room air handlers with variable speed drive controls and high efficiency motors; transformer-free uninterrupted power supplies for more energy efficient power conditioning; and the use of ASHRAE TC-9.9 Thermal Guidelines for Data Processing Environments that allow higher supply and cooling temperatures and broader humidity ranges. These features are assumed in the calculations in **Error! Reference source not found.** below. Overall, the project sponsor has calculated that as a result of its implementation of the above efficiency measures, the proposed project would operate with a PUE of 1.5, which is less than one survey of industry peers' average self-reported PUE of 1.8 to 1.89 for existing multi-customer and multi-story data centers. A PUE of 1.5 is similar to the existing PUE for two suites, which were recorded at 1.51 and 1.45.

### **Greenhouse Gas Emission Estimates**

As shown in Table 2, the proposed project's annual GHG emissions would equal 11,898 MTCO<sub>2</sub>E. These emissions are less than they would be without the efficiency measures mentioned above. The largest source, indirect annual electricity consumption of 61,320 MWh, accounts for approximately 92.4 percent (11,001 MTCO<sub>2</sub>E) of the proposed project's annual GHG emissions. The second largest source, direct emissions from the operation of the 18 new diesel backup generators, accounts for approximately 7.5 percent (894 MTCO<sub>2</sub>E) of the proposed project's annual GHG emissions.

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<sup>96</sup> Governor's Office of Planning and Research, Technical Advisory- CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, June 19, 2008. Available online at: <http://opr.ca.gov/docs/june08-ccqa.pdf>. Accessed August 23, 2012.

**Table 8 - 200 Paul Annual GHG Emission Estimates**

Emission Source	Annual GHG Emission Estimate (MTCO <sub>2</sub> E)
Annualized Construction Emissions <sup>a</sup>	3
Operational Direct Emissions from 18 Proposed Generators	894
Operational Indirect Emissions from 7 MW load increase	11,001
<b>Total</b>	<b>11,898</b>

*Notes:* Total construction emissions equal 113 MTCO<sub>2</sub>E. Emissions are annualized over the expected 40-year lifespan of the proposed project.

The next section describes whether or not the proposed project's GHG emissions are cumulatively considerable by analyzing the proposed project's, GHG emissions, and consistency with statewide, regional, and local plans and regulations.

### Consistency with Plans and Programs

**GHG Reduction Checklist.** The proposed project would be required to comply with the following ordinances that reduce GHG emissions.

Regulation	Requirements	Project Compliance	Discussion
<b>Transportation Sector</b>			
Commuter Benefits Ordinance (San Francisco Environment Code, Section 421)	<p>All employers of 20 or more employees must provide at least one of the following benefit programs:</p> <p>1. A Pre-Tax Election consistent with 26 U.S.C. § 132(f), allowing employees to elect to exclude from taxable wages and compensation, employee commuting costs incurred for transit passes or vanpool charges, or</p> <p>(2) Employer Paid Benefit whereby the employer supplies a transit pass for the public transit system requested by each Covered Employee or reimbursement for equivalent vanpool charges at least equal in value to the purchase price of the appropriate benefit, or</p> <p>(3) Employer Provided Transit furnished by the employer at no cost to the employee in a vanpool or bus, or similar multi-passenger vehicle operated by or for the employer.</p>	<p><input checked="" type="checkbox"/> Project Complies</p> <p><input type="checkbox"/> Not Applicable</p> <p><input type="checkbox"/> Project Does Not Comply</p>	The project sponsor has a pre-tax commuter benefits project available to their employees.



Regulation	Requirements	Project Compliance	Discussion
<b>Energy Efficiency Sector</b>			
San Francisco Green Building Requirements for Stormwater Management (San Francisco Building Code, Chapter 13C) Or San Francisco Stormwater Management Ordinance (Public Works Code Article 4.2)	Requires all new development or redevelopment disturbing more than 5,000 square feet of ground surface to manage stormwater on-site using low impact design. Projects subject to the Green Building Ordinance Requirements must comply with either LEED® Sustainable Sites Credits 6.1 and 6.2, or with the City's Stormwater Management Ordinance and stormwater design guidelines.	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project would be subject to and would be required to comply with this requirement.
San Francisco Existing Commercial Buildings Energy Performance Ordinance (San Francisco Environment Code)	Requires owners of nonresidential buildings in San Francisco to conduct energy efficiency audits, as well as to annually measure and disclose energy performance. The ordinance applies to nonresidential buildings greater than 10,000 square feet, with different requirements for buildings greater than 50,000 square feet. Certain exceptions apply for new construction and if specified performance criteria are met.	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project would be subject to and would be required to comply with this requirement.
San Francisco Conditional Use for Internet Services Exchange (San Francisco Planning Code, Section 303(h))	Requires the Planning Commission to determine certain criteria are met, including that the building is designed to minimize energy consumption, the project sponsor has examined the feasibility of supplying on-site power, and the project sponsor has submitted design capacity and projected power use. In addition, it requires the project sponsor to submit annual power use statements.	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project would be subject to and would be required to comply with this requirement through the Conditional Use process.
<b>Waste Reduction Sector</b>			
Mandatory Recycling and Composting Ordinance (San Francisco Environment Code, Chapter 19) and San Francisco Green	All persons in San Francisco are required to separate their refuse into recyclables, compostables and trash, and place each type of refuse in a separate container designated for disposal of that type of refuse.	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project would be subject to and would be required to comply with this requirement.

Regulation	Requirements	Project Compliance	Discussion
Building Requirements for solid waste (San Francisco Building Code, Chapter 13C)	Pursuant to Section 1304C.0.4 of the Green Building Ordinance, all new construction, renovation and alterations subject to the ordinance are required to provide recycling, composting and trash storage, collection, and loading that is convenient for all users of the building.		
San Francisco Green Building Requirements for construction and demolition debris recycling (San Francisco Building Code, Chapter 13C)	Projects proposing demolition are required to divert at least 75% of the project's construction and demolition debris to recycling.	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project would be subject to and would be required to comply with this requirement.
<b>Environment/Conservation Sector</b>			
Construction Site Runoff Pollution Prevention for New Construction  (San Francisco Building Code, Chapter 13C)	<p>Construction Site Runoff Pollution Prevention requirements depend upon project size, occupancy, and the location in areas served by combined or separate sewer systems.</p> <p>Projects meeting a LEED® standard must prepare an erosion and sediment control plan (LEED® prerequisite SSP1).</p> <p>Other local requirements may apply regardless of whether or not LEED® is applied such as a stormwater soil loss prevention plan or a Stormwater Pollution Prevention Plan (SWPP).</p> <p>See the SFPUC Web site for more information:  <a href="http://www.sfwater.org/CleanWater">www.sfwater.org/CleanWater</a></p>	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project would be subject to and would be required to comply with this requirement.
Regulation of Diesel Backup Generators (San Francisco Health Code, Article 30)	<p>Requires (among other things):</p> <ul style="list-style-type: none"> <li>All diesel generators to be registered with the Department of Public Health</li> <li>All new diesel generators must be equipped with the best available air emissions control technology.</li> </ul>	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project would be subject to and would be required to comply with this requirement.

**California, Regional, and Local Greenhouse Gas Emissions Goals.** EO S-3-05, AB 32, and the Bay Area 2010 Clean Air Plan goals include<sup>97</sup> reducing GHG emissions to 2000 levels by 2010 and 1990 levels by 2020. San Francisco has reduced 2010 GHG emissions (5.3 million MTCO<sub>2</sub>E) by approximately 14.5 percent compared to 1990 levels (6.2 million MTCO<sub>2</sub>E), thereby, exceeding EO S-3-05, AB 32, and the Bay Area 2010 Clean Air Plan goals. The proposed project's annual GHG emissions would equal 11,898 MTCO<sub>2</sub>E. Adding the proposed project's GHG emissions with San Francisco's 2010 GHG emissions would result in an overall GHG reduction of approximately 14.4 percent less than 1990 levels. With implementation of the proposed project, San Francisco would continue to meet and exceed EO S-3-05, AB 32, and Bay Area 2010 Clean Air Plan goals. Furthermore, proposed project's GHG emissions in addition to California's and San Francisco's GHG emissions would represent a small amount of California's (0.003 percent) and San Francisco's (0.224 percent) 2010 GHG emission inventory. For the above reasons, the proposed project would not conflict with EO S-3-05, AB 32, or the Bay Area 2010 Clean Air Plan.

San Francisco's Greenhouse Gas Reduction Ordinance includes<sup>98</sup> GHG reduction goals intended to reduce GHG by 25 percent below 1990 levels by 2017. As described above, adding the proposed project's GHG emissions with San Francisco's 2010 GHG emissions would result in an overall GHG reduction of approximately 14.4 percent less than 1990 levels.

The majority of the proposed project's GHG emissions (92.4 percent, 11,001 MTCO<sub>2</sub>E) would be a result of indirect electricity consumption. Annual GHG emissions from indirect electricity are based on a PG&E CO<sub>2</sub> emission factor of 0.178 MTCO<sub>2</sub>/MWh from 2011, where 19 percent of PG&E total power mix was eligible renewables.<sup>99</sup> Per SB X1-2, PG&E's total power mix will be required to have 25 percent eligible renewables by the end of 2016 and 33 percent by the end of 2020, a 14 percent increase in eligible renewables compared to 2011. Therefore, the estimates of indirect electricity GHG emissions from the proposed project are conservative in that they do not take SB X1-2 into account for future years. The California PUC estimates PG&E's CO<sub>2</sub> emission factors for 2017 to be 0.158 MTCO<sub>2</sub>/MWh and 2020 to be 0.131 MTCO<sub>2</sub>/MWh, which are lower than the emission factor used for the analysis in 2011.<sup>100</sup> Using these future estimates, the proposed project's annual GHG emissions from indirect electricity would be reduced by 11.1 percent (to 9,777 MTCO<sub>2</sub>E) by 2017, and 26.0 percent (to 8,136 MTCO<sub>2</sub>E) by 2020 compared to 2011 proposed project estimates.<sup>101</sup>

In addition, the analysis does not account for potential GHG emission reductions from the proposed project due to City policies, such as the San Francisco Existing Commercial Buildings Energy Performance Ordinance, which requires the project sponsor to conduct energy efficiency audits. Although this ordinance does not require the project sponsor to implement the recommendations from the audit, it may be financially beneficial for the project sponsor, given the high amount of energy consumption and GHG emissions and associated cost from the project site, including the existing leased spaces and the proposed new/converted spaces. Furthermore, adding the proposed project's GHG emissions to San Francisco's (5.3 million MTCO<sub>2</sub>E)

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<sup>97</sup> The state, the region, and San Francisco have further GHG goals and emission limits for dates beyond 2017 and 2020. However, at this point it is too speculative to compare the proposed project's GHG emissions with dates beyond 2017 and 2020 given the uncertainty of estimating state and local GHG emissions that far into the future.

<sup>98</sup> *Ibid.*

<sup>99</sup> PG&E, "Clean Energy Solutions." Available online at: <http://www.pge.com/en/about/environment/pge/cleanenergy/index.page>. Accessed June 12, 2013.

<sup>100</sup> PG&E, 2013c.

<sup>101</sup> Both GHG estimates assume a constant of 70 MT from CH<sub>4</sub> and N<sub>2</sub>O to obtain a MTCO<sub>2</sub>E.

emissions inventory would represent a small amount of San Francisco's (0.224 percent) 2010 GHG emissions. For the above reasons, the proposed project would not conflict with San Francisco's Greenhouse Gas Reduction Ordinance and thus the proposed project's GHG emissions would not be cumulatively considerable.

## Summary

San Francisco has numerous policies in place to reduce a proposed projects' GHG emissions. These policies have proven effective as San Francisco has resulted in a measured reduction of annual GHG emissions compared to 1990 emissions levels, which meets and exceeds EO S-3-05, AB 32, and the Bay Area 2010 Clean Air Plan GHG reduction goals for the year 2020. These policies, as outlined in San Francisco's *Strategies to Address Greenhouse Gas Emissions*, meet the CEQA and BAAQMD requirements for a Greenhouse Gas Reduction Strategy. The proposed project was determined to be consistent with San Francisco's *Strategies to Address Greenhouse Gas Emissions*.<sup>102</sup> Other existing state, regional, and local policies, such as Renewable Portfolio Standard requirements for electricity providers, cap-and-trade program from large GHG emitters, and CleanPowerSF, will continue to reduce a proposed project's contribution to climate change. The proposed project's GHG emissions would not conflict with state, regional, and local GHG reduction plans and regulations, and thus the proposed project's contribution to GHG emissions would not be cumulatively considerable or generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment. As such, the proposed project would result in a less-than-significant impact with respect to GHG emissions. No mitigation measures are necessary.

While the proposed project's impacts to GHG emissions would be less than significant, City decisionmakers may wish to consider the following improvement measure to further reduce these less-than-significant impacts.

### Improvement Measure I-GHG-1: Reduce GHG Emissions

The project sponsor or property owner, starting for the year 2014, should annually measure and disclose greenhouse gas (GHG) emission estimates to the San Francisco Planning Department. The annual disclosure of GHG emission estimates should be submitted to and reviewed and approved by the San Francisco Planning Department and should include GHG emissions from indirect electricity consumption and direct stationary source usage. As part of the disclosure requirements,<sup>103</sup> the project sponsor or property owner should identify any measures taken that have resulted in a reduction in GHG emissions. Measures the project sponsor or property owner could consider to reduce GHG emissions include the following:

- Implement the measures recommended in the energy audit per the San Francisco Commercial Building Energy Performance Ordinance, throughout the entire Internet Services Exchange facility (i.e., not just the space for the proposed project);

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<sup>102</sup> San Francisco Planning Department, Greenhouse Gas Analysis: Compliance Checklist, June 19, 2013. This document is on file and available for public review at the Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2012.0153E.

<sup>103</sup> The project sponsor or property owner will be required to comply with the San Francisco Existing Commercial Buildings Energy Performance Ordinance and the conditions of approval per Planning Code 303(h), which requires, among other things, annually measuring energy performance and disclosing that information to the San Francisco Department of Environment and San Francisco Planning Department.

- Consider alternative types of backup power that would result in less GHG emissions than diesel generators;
- On-site co-generation (i.e., using waste heat for cooling);
- On-site renewable energy (e.g., solar panels);
- Enroll in PG&E's "Green Option" program;
- Contract/enroll with another electricity provider with lower electricity emissions factors (e.g., SFPUC, CleanPowerSF);
- Purchase renewable energy credits/certificates that can be tracked.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>E.9. Wind and Shadow</b>					
Would the project:					
a) Alter wind in a manner that substantially affects public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Impact WS-1: The proposed project would not alter wind in a manner that substantially affects public areas. (Less than Significant)**

Wind impacts are generally caused by tall buildings that are substantially higher than the surrounding structures and oriented in a manner that a large wall catches a prevailing wind, particularly if such a wall includes little or no articulation. All of the above-grade structures that would be constructed as part of the proposed ISE expansion would be less than the height of the existing on-site structures they abut. The proposed ISE expansion project includes the removal of a portion of an existing warehouse building and construction of a new southern building elevation at the end of the shortened building. This new building wall would be constructed to the same 25-foot height as the existing warehouse. Other aboveground improvements would include 12 new concrete generator pads and 18 new diesel backup generators. The total height of a concrete pad with a generator installed on it would be approximately 22 feet to the highest point of the generator.

A 27-foot-high noise attenuation wall (required to be four feet higher than the top of the generators) would also be constructed as part of the implementation of **Mitigation Measure M-NO-1: Attenuation of Noise from Outdoor Equipment**. This noise attenuation wall would extend from the northwest corner of the 50-foot-high Building D, then along the western edge of the expanded generator service yard. The wall would return along an approximately 60-foot-long portion of the northern side of the generator service yard. The buildings on the north and south sides of the new generators and noise attenuation wall are the 25-foot-high Buildings A and B and the 50-foot-high Building D, respectively. Therefore, the proposed new structures would not be substantially higher than the surrounding buildings and would have a less-than-significant impact on wind patterns.

**Impact WS-2: The proposed project would create new shadows, but not in a manner that would substantially affect outdoor recreation facilities or other public areas. (No Impact)**

Section 295 of the Planning Code was adopted in response to Proposition K (passed November 1984) in order to protect certain public open spaces from shadowing by new structures during the period between one hour after sunrise and one hour before sunset, year round. Planning Code Section 295 restricts net new shadow on public open spaces under the jurisdiction of, or to be acquired by, the Recreation and Park Commission by any structure exceeding 40 feet unless the Planning Commission, in consultation with the Recreation and Park Commission, finds the impact to be less than significant. Section 147 of the Planning Code, Shadows on Publicly Accessible Open Spaces, states that new buildings over 50 feet in height in C-3 Downtown Commercial Districts must be “shaped, consistent with the dictates of good design and without unduly restricting the development potential of the site, to reduce substantial shadow impacts on public plazas and other publicly accessible spaces other than those protected under Section 295.” The nearest outdoor recreation facility to the project site is the Bayview Playground at 5701 Third Street that is located approximately 0.4 miles from the project site. Two recreational facilities, the Silver Terrace Clubhouse and Playground at 1700 Silver Avenue and the Palega Recreation Center at 500 Felton Street, are both approximately 0.7 miles from the project site.

The height of all of the aboveground structures built as part of this ISE expansion would be less than 40 feet. The new building wall at the end of Building B would have a maximum height of 25 feet. As the closest public land under the jurisdiction of the Recreation and Parks department is located 0.4 miles from the project site. The 27-foot-high noise attenuation wall required by **Mitigation Measure M-NO-1: Attenuation of Noise from Outdoor Equipment** would be 27 feet in height. Therefore, the structures built as part of the ISE expansion would not have any impact on the shadows on public spaces.

**Impact C-WS-1: The proposed project, in combination with other past, present, or reasonably foreseeable future projects in the vicinity, would not have a cumulatively considerable contribution to a significant cumulative wind and shadow impact. (Less than Significant)**

There are several approved projects and reasonable foreseeable future projects within a quarter-mile radius of the project site, as identified in Table 2 on p. 22. The proposed project would not have a significant wind impact in the project vicinity as the new structures would be built at or below the height of the existing on-site structures and would be a maximum of 25 feet tall (or 27 feet tall taking into consideration Mitigation Measure M-NO-1). The approved and future projects closest to the site would include the construction of buildings at the same height as buildings they would replace, or that are already constructed on the site. Those structures would all be higher than the proposed improvements on the project site and have been, or would be, evaluated for any potential wind impacts. Therefore, the proposed project in combination with projects currently proposed in the vicinity would not substantially alter the wind patterns that could affect public areas, and cumulative wind impacts would be considered less than significant.

The proposed project would not result in net new shadows in the vicinity. Over time, development of potentially taller buildings could occur in the vicinity of the project site. These projects have the potential to alter the shadow environment in the general vicinity of the proposed project. However, the proposed project would not cast shadows on outdoor recreational spaces. Therefore, the proposed project would not contribute to any significant cumulative shadow impacts on such properties. Thus the proposed project, in combination with cumulative projects considered in this analysis, would not be expected to contribute considerably to

adverse shadow effects under cumulative conditions, and cumulative shadow impacts would be considered less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>E.10. Recreation</b>					
Would the project:					
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Physically degrade existing recreational resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

The nearest recreation facility to the project site is the Bayview Playground at 5701 Third Street that is located approximately 0.4 miles from the project site and is the only park within one-half mile of the project site. Two recreational facilities, the Silver Terrace Clubhouse and Playground at 1700 Silver Avenue and the Palega Recreation Center at 500 Felton Street, are both approximately 0.7 miles from the project site. The proposed project would minimally increase the use of recreational facilities and parks due to an increase in approximately 25 employees that would be working at the ISE facility. The project would result in a minor increase to the existing demand for public recreational facilities in this area and would not result in substantial physical deterioration of existing recreational resources. Therefore, impacts on recreational activities and facilities would be less than significant.

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

The proposed project would not include any planned recreational facilities on- or off-site. The project would result in a negligible increase in the use of existing recreational facilities and parks in the area due to the increase of approximately 25 employees who would be employed at the ISE facility. This minor increase in the demand for recreational facilities that would be generated by these 25 employees would not necessitate the construction of new recreational facilities or the expansion of existing facilities. The proposed project is in an

area currently served by existing recreational facilities. Therefore, the construction of new facilities would not be needed and construction of these facilities would not have a physical environmental impact.

**Impact RE-3: The proposed project would not physically degrade existing recreational facilities. (No Impact)**

The proposed project would not result in the physical alteration of any recreational resource within the vicinity of the project site or in the City as a whole. The proposed project would result in the demolition of a portion of a warehouse building and the expansion of a generator service yard in its place within an existing ISE facility 0.4 miles from the closest recreation facility. Therefore, the project would not have any impact on the physical degradation of any existing recreational facilities.

**Impact C-RE-1: The proposed project, in combination with past, present, and reasonable foreseeable future projects, would not have a cumulatively considerable contribution to a significant cumulative impact on recreational facilities in the project site vicinity. (Less than Significant)**

The use of recreational facilities in the vicinity of the project site is not expected to noticeably increase as a result of the proposed project. The proposed project would result in an additional 25 employees that would be within the additional 5,308 new employees assumed to be added to the project vicinity as part of the future growth in the BVHP Area Plan. The BVHP EIR<sup>104</sup> found that the addition of these new employees would have a less-than-significant impact on existing recreation facilities. Additionally, a component of the Area Plan included a Community Enhancements Program that would add both open space and new recreation areas to the Plan Area. Therefore, the contribution of the proposed project to cumulative recreation-related impacts would be less than significant.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
<b>E.11. Utilities and Service Systems</b>					
Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<sup>104</sup> Bayview Hunters Point Redevelopment Projects and Rezoning Final EIR, 2006.



<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Impact UT-1: Implementation of the proposed project would not require or result in the construction of wastewater collection and treatment facilities, exceed permitted wastewater treatment requirements, or require new or expanded stormwater drainage facilities. (Less than Significant)**

The project site is located within an area served by existing wastewater and stormwater facilities. The proposed project would expand an existing ISE facility, resulting in an incremental increase in the demand for wastewater collection and treatment by the facility. Project-related wastewater and stormwater would continue to flow into the City's combined stormwater and sewer system and would be treated to the standards contained in the City's National Pollutant Discharge Elimination System (NPDES) Permit for the Southeast Water Pollution Control Plant, prior to discharge into the San Francisco Bay.

As identified in the Project Description, the proposed project would be consistent with current land use controls, including the BVHP Area Plan. Thus, it is reasonable to assume that the 25 additional employees and any associated population growth that would result from implementation of the proposed project is within the City's overall growth projections estimated by the Association of Bay Area Governments Projections 2009, as specified by the BVHP Area Plan. Similarly, the additional wastewater generation associated with the proposed project would be within the anticipated overall increase in wastewater generation attributed to future growth in employment.

The entire project site is covered with impervious surface. The proposed expansion and related physical improvements would not change the amount of impervious surface on the site. Because the project would disturb more than 5,000 square feet of surface area, the proposed project would be subject to project review by the San Francisco Public Utilities (SFPUC) to ensure that impacts on the City's combined sewer system are reduced. The project would comply with the City's Stormwater Design Guidelines, which describe the requirements for stormwater management pursuant to the City's Stormwater Management Ordinance.<sup>105</sup>

<sup>105</sup> SFPUC, *Stormwater Design Guidelines*, <http://sfwater.org/index.aspx?page 446>, accessed November 21, 2011.

Requirements for stormwater treatment mandated by the Stormwater Management Ordinance would decrease the incremental amount of stormwater requiring treatment at the Southeast Water Pollution Control Plant. The proposed project would not exceed permitted wastewater treatment requirements or require new wastewater or stormwater collection and treatment facilities; therefore, the proposed project would have a less-than-significant impact on San Francisco's wastewater and stormwater systems.

**Impact UT-2: The SFPUC has sufficient water supply and entitlements to serve the proposed project, and implementation of the proposed project would not require expansion or construction of new water treatment facilities. (Less than Significant)**

All proposed large-size projects in California subject to CEQA are required to obtain an assessment from a regional or local jurisdiction water agency to determine the availability of a long-term water supply sufficient to satisfy project-generated water demand. In May 2002, the SFPUC adopted a resolution finding that the SFPUC's Urban Water Management Plan (UWMP) adequately fulfills the requirements of the water assessment for water quality and wastewater treatment and capacity as long as a proposed project is covered by the demand projections identified in the UWMP,<sup>106</sup> which included all known or expected development projects in San Francisco at that time through 2020.

During construction, the project would be required to use recycled water from the Southeast wastewater treatment facility for construction activities, i.e. demolition dust, soil treatment, etc. Operation of the proposed project would increase the amount of water required to serve the project site due to the additional employees. However, as described in Impact UT-1 above, the proposed project would be consistent with current land use controls. Therefore, the proposed project would not cause population and employment growth and the associated increase in water demand beyond what is anticipated by the allowable land-use types and densities established in the BVHP Area Plan and Planning Code. As such, the proposed project would not result a demand for water supply beyond that considered in SFPUC's 2010 UWMP, which looks at current land use designations and zoning district regulations in its evaluation of known or expected future development projects.<sup>107</sup> Because the water demand associated with the proposed project is within the demand projections considered by the 2010 UWMP and the proposed project would comply with applicable water conservation regulations, there would be sufficient capacity in the City's current water supply allocation from SFPUC to accommodate the proposed project. Therefore, the project's impact on water supply would be less than significant.

**Impact UT-3: The proposed project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs and would comply with applicable statutes and regulations related to solid waste. (Less than Significant)**

Solid waste generated in San Francisco is transported to the Altamont Landfill in Alameda County. The landfill has a permitted peak maximum daily disposal of 11,150 tons per day and accepted 1.29 million tons in 2007. The landfill has an estimated remaining capacity of approximately 46 million cubic yards or 74 percent of its permitted capacity. The estimated closure date of the landfill is 2025.<sup>108</sup> However, the City's remaining

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<sup>106</sup> City and County of San Francisco, Public Utilities Commission, Resolution No. 02-0084, May 14, 2002.

<sup>107</sup> City and County of San Francisco, *Urban Water Management Plan*, June 2011.

<sup>108</sup> California Department of Resources Recycling and Recovery (CalRecycle), Facility/Site Summary Details: Altamont Landfill and Resource Recovery (01-AA-0009), <http://www.calrecycle.ca.gov/SWFacilities/Directory/01-AA-0009/Detail/>, accessed December 4, 2012.

contracted capacity at the landfill is anticipated to be reached as soon as 2015. The City is in the process of planning for additional landfill beyond 2015.

Recycling, composting, and waste reduction are expected to increasingly divert waste from the landfill, per California and local requirements. The City was required by the State's Integrated Waste Management Act (AB 939) to divert 50 percent of its waste stream from landfill disposal by 2000. The City met this threshold in 2003 and has since increased it to 69 percent in 2005 and 70 percent in 2006. In addition, the Board of Supervisors adopted a plan in 2002 to recycle 75 percent of annual wastes generated by 2010. The City achieved a 77 percent diversion rate for 2008, thereby surpassing the diversion goal established in the 2002 legislation.<sup>109</sup>

The proposed project would be subject to the City's Mandatory Recycling and Composting Ordinance (City Ordinance 100-09), which requires all San Francisco residents and commercial landlords to separate their refuse into recyclables, compostables, and trash, thereby minimizing solid waste disposal and maximizing recycling. The project would also be subject to the City's Construction and Demolition Debris Recovery Ordinance (Ordinance 27-06), which requires all construction and demolition debris to be transported to a registered facility that can divert a minimum of 65 percent of the material from landfills. The proposed project would comply with these and other applicable state and local statutes and regulations associated with operational and construction-related solid waste.

Although the additional employees working at the ISE facility as a result of the proposed project would incrementally increase total waste generation from the City, the increasing rate of diversion through recycling and other methods would result in a decreasing share of total waste that requires deposition into the landfill. Given this, and given the long-term capacity available at the Altamont Landfill and the City's planning for future landfill capacity, the solid waste generated by project construction and operation would not result in the landfill exceeding its permitted capacity, and the proposed project would result in a less-than-significant impact related to solid waste disposal.

**Impact C-UT-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the site, would not have a cumulatively considerable contribution to a significant cumulative impact on water and service systems. (Less than Significant)**

The BVHP FEIR<sup>110</sup> analyzed the cumulative impacts of the additional 2.4 million square feet of mixed uses that could be built as a result of the Area Plan. The ISE facility is within an area designated for a future growth in employment and additional industrial uses. Wastewater treatment at 2025 for the Plan Area was estimated at 940,336 gallons per day, which was within the expected growth projection for the City and would have a less-than significant impact on wastewater treatment capacity. The new development in the BVHP Area Plan was anticipated to generate 39,971 pounds of solid waste per day and based on a presumed increase in recycling and the 2004-approved Altamont landfill expansion, it was determined this additional waste would have a less-than-significant impact on the demand for solid waste disposal. At build-out in 2025 of the new development within the Plan Area, additional water demand of 1.4 million gallons per day was projected to be

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<sup>109</sup> City of San Francisco, Department of the Environment, Zero Waste on SF Horizon, July 27, 2011, [http://www.sfenvironment.org/our\\_sfenvironment/news.html?topic=details&ni=753](http://www.sfenvironment.org/our_sfenvironment/news.html?topic=details&ni=753), accessed November 14, 2011.

<sup>110</sup> *Bayview Hunters Point Redevelopment Projects and Rezoning Final EIR*, 2006.

needed based on water generation factors of 60 gallons per day per resident and 35 gallons per day per employee. Because this projected demand from future development in the BVHP Area Plan is within the citywide growth projections, new development within the Plan Area was found to have a less-than-significant impact on water supply within the City.

Given the City's existing service management plans address anticipated growth in the region and that the proposed project would be consistent with new development within the BVHP Area Plan evaluated in the BVHP FEIR, the proposed project in combination with other cumulative projects would not be expected to have cumulatively considerable impacts on utility service provision or facilities under future conditions. Therefore, the proposed project would result in less-than-significant cumulative impacts on utilities and service systems.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
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## E.12. Public Services

Would the project:

- |                                                                                                                                                                                                                                                                                                                                                                                                                                         |                          |                          |                                     |                          |                          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a) Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|

### **Impact PS-1: The proposed project would not increase demand for police service, and would not result in substantial adverse impacts associated with the provision of such service. (Less than Significant)**

The existing project site currently receives police protection services from the San Francisco Police Department (SFPD). The project site is within the Bayview Police District that covers the southeastern part of the city, extending along the eastern edge of McClaren Park (Cambridge Street) to the Bay and south from Channel Street to the San Mateo County line. The Bayview police station is located at 201 Williams Avenue, approximately 0.68 miles from the project site. The expansion of the ISE use on the project site would incrementally increase demand for police services in the area. The ISE facility would have security personnel on-site at all times and thus, is anticipated to create only a minor increase in calls for service. Given the nature of the proposed project, it would not necessitate the construction of a new police station and would have a less-than-significant impact on police protection services.

### **Impact PS-2: The proposed project would not increase demand for fire protection services, and would not result in substantial adverse impacts associated with the provision of such service. (Less than Significant)**

The nearest fire stations to the project site are Stations #17, #42, and #44 located at 1295 Shaffer Avenue, 2430 San Bruno Avenue, 1298 Girard Street respectively, all approximately one-half mile from the project site. The

construction and operation of the expanded ISE use would incrementally increase demand for fire suppression in the area. The San Francisco Fire Department has sufficient resources in the surrounding area. Therefore, this impact would be less than significant.

**Impact PS-3: The proposed project would not directly or indirectly generate school students and there would be no impact on existing school facilities. (Less than Significant)**

The proposed project would not add any residential dwelling units to the area. The increase of 25 employees may increase the number of school students generated by potential family members. Any increase would be minor. The proposed project would not result in a substantial unmet demand for school facilities and would not necessitate new or physically altered school facilities. Therefore, the proposed project would have a less-than-significant impact on school facilities.

**Impact PS-4: The proposed project would not increase the demand for government services, and there would be no impact on government facilities. (Less than Significant)**

The proposed project may result in a minor increase in demand for governmental services due to the potential increase generated by the 25 additional employees. The minor increase in demand for services would not be expected to necessitate the need for new or physically altered government facilities, and therefore would have a less-than-significant impact on governmental facilities.

**Impact C-PS-1: The proposed project, combined with past, present, and reasonably foreseeable future projects in the vicinity, would not result in a cumulatively considerable contribution to a significant cumulative impact on public services. (Less than Significant)**

The proposed ISE expansion is expected to incrementally increase demand for public services. Cumulative development in the BVHP Area Plan would incrementally increase demand for public services, but not beyond levels anticipated and planned for by public service providers. The BVHP FEIR<sup>111</sup> found that the future growth within the Area Plan would result in a less-than-significant impact on public services. The proposed ISE expansion would be within those growth estimates studied in the BVHP FEIR. Thus, the proposed project in combination with other planned growth in the BVHP Area Plan would have a less-than-significant impact on public services.

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<sup>111</sup> *Bayview Hunters Point Redevelopment Projects and Rezoning Final EIR, 2006.*

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>E.13. Biological Resources</b>					
Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site and the majority of the Bayview area are highly developed. The project site is covered entirely with impermeable surfaces devoid of vegetation and, therefore the only native biological resources that currently exist at the project site would be limited to birds, rodents, and small mammals, e.g. skunks, raccoons, etc., adapted to the urban environment. Potential impacts to birds are discussed in Impact BI-1. The project site is contiguous with the approximately 125-foot-wide Caltrain rail tracks that have sloped open space area on

both sides and is covered with ruderal vegetation comprised of non-native annual grasses and forbs common to the Bay Area.

The project site and the Caltrains right-of-way are part of the South Basin Activity Node in the BVHP FEIR<sup>112</sup> which was identified as an area without any sensitive species or habitat. Given the conditions present on the project site and in the area, the proposed project would not affect a rare or endangered plant or animal species or habitats, riparian habitats or sensitive natural communities, or wetlands. Therefore, topics E.13.a through E.13.c are not applicable to the proposed project. Also, the project site does not fall within any local, regional or State habitat conservation plans, and, therefore, criterion E.13.f is also not applicable.

**Impact BI-1: Implementation of the proposed project would not interfere with the movement of any native migratory bird species or wildlife corridors. (Less than Significant)**

With respect to wildlife corridors, San Francisco's wildlife habitats are fragmented, occurring mostly in areas where there are open spaces and/or natural habitats, and the opportunity for significant wildlife movement is limited. In the highly developed Bayshore/ Bayview area, there is no opportunity for native wildlife movement for species other than birds, which are discussed below, or common species, such as raccoons, skunks, and squirrels.

The project site is surrounded by urban development and is not proximate to, nor does it contain, large expanses of open space or water representing potentially attractive migratory bird stopovers. Nevertheless, both resident and migratory birds are known to use San Francisco for breeding and foraging. The proposed ISE expansion would remove a portion of an existing warehouse and construct a new masonry wall, without any glazing, at the end of the shortened building.

Birds may nest in the trees on the property at 400 Paul Avenue, adjacent to the project site. Nesting birds and their nests and eggs are fully protected by *California Fish and Game Code* (Sections 3503, 3503.5) and the Migratory Bird Treaty Act (MBTA). The MBTA protects over 800 species, including geese, ducks, shorebirds, raptors, songbirds, and many relatively common species. Destruction or disturbance of a nest would be a violation of these regulations and is considered a potentially significant impact, in that the potential exists that special- status bird species (although not observed at the site) could be affected. Hawks hunting for rodents and other small prey in the Caltrain open space may use the highest points of the ISE facility, the front five-story building, for a temporary perch. However, no changes or construction to this building are included as part of the project. Rather, compliance with the Migratory Bird Treaty Act would ensure that impacts to resident and migratory birds would be less than significant.

**Impact BI-2: Implementation of the proposed project would not conflict with local tree protection and landscaping regulations. (No Impact)**

The San Francisco Planning Department, DBI, and DPW have established guidelines to ensure that legislation adopted by the Board of Supervisors governing the protection of trees, including street trees, is implemented. Public Works Code Section 8.02-8.11 requires disclosure and protection of Landmark, Significant and Street trees, collectively known as "protected trees," located on private and public property. A landmark tree has the highest level of protection and must meet certain criteria for age, size, shape, species location, historical

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<sup>112</sup> *Bayview Hunters Point Redevelopment Projects and Rezoning Final EIR, 2006.*

association, visual quality, or other contribution to the City's character and has been found worthy of Landmark status after public hearings at both the Urban Forestry Council and the Board of Supervisors. A significant tree is either on property under the jurisdiction of the DPW, or on privately owned land within ten feet of the public right-of-way which satisfies certain criteria. Removal of a landmark, significant, or a street tree requires a permit from DPW.

There are no trees or landscaping on the project site or street trees along the project site's frontage. No landscaping is proposed to be added anywhere on the site, though the project would be required to comply with the City's Green Landscaping Ordinance which may require street trees or sidewalk planting be added due to the project adding additional parking spaces. The proposed project would comply with local ordinances protecting trees and applicable landscape ordinances and would not have an impact on trees or other landscaping regulated through these ordinances.

**Impact C-BI-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the site, would not have a cumulatively considerable contribution to a significant cumulative impact on biological resources. (Less than Significant)**

The project site is in an area of intense urbanization with no on-site vegetation and is not adjacent to any open space area with known sensitive plant or animal species. Past projects, including the development of infill mixed-use projects and reuse and replacement of vacant commercial and industrial uses for new tenants, and public transit and utility infrastructure, have caused substantial adverse cumulative impacts on biological resources in the vicinity of the project site. There are no remaining natural communities within the vicinity of the project site and wildlife diversity is, consequently, greatly reduced from that found in areas with natural vegetation and less human activity.

Implementation of cumulative projects, such as the expansion of the 200 Paul data center and the addition of a senior center and new residential units at 5800 Third Street, would not adversely affect important habitat areas or inhibit migratory routes as the project area is fully urbanized. Nonetheless, these cumulative development projects would be subject to the City's Urban Forestry Ordinance, Public Works Code Section 8.02-8.11, which requires a permit from DPW to remove any protected trees and tree replacement or in-lieu fees. Further, *Planning Code* Section 132, the Green Landscaping Ordinance, provides requirements that would apply to new development projects, or significant alterations to existing developments, that would result in healthier and more plentiful plantings through screening, parking lot, and street tree controls; increased permeability through front yard and parking lot controls; responsible water use through increasing "climate appropriate" plantings; and improved screening by creating an ornamental fencing requirement and requiring screening for newly defined "vehicle use areas." The combination of the Urban Forestry Ordinance and the Green Landscaping Ordinance would maintain or improve the biological resources in the context of the City's urban environment.

As previously concluded, the proposed project would result in less-than-significant impacts related to migratory birds and compliance with existing tree protection and landscaping regulations. When considered relative to the existing cumulative impact on biological resources caused by past, present, and reasonably foreseeable projects, the proposed project would not result in a contribution to a significant cumulative biological impact. The proposed project's contribution would not be cumulatively considerable; therefore, the cumulative impact of the proposed project on biological resources would be less than significant.



<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>E.14. Geology and Soils</b>					
Would the project:					
a) Expose people or structures to 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.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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 wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Change substantially the topography or any unique geologic or physical features of the site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The proposed project would connect to the City's sewer and stormwater collection and treatment system and would not use a septic water disposal system. Therefore, Topic E.14.e is not applicable to the project site.

**Impact GE-1: The proposed project would not result in exposure of people and structures to substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, expansive soils, seismic ground-shaking, liquefaction, or lateral spreading. (Less than Significant)**

The project site is not located within an Earthquake Fault Zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act and no known or potentially active fault exists on the project site. In a seismically active area, such as the San Francisco Bay Area, the possibility exists for future faulting in areas where no faults previously existed. A geotechnical analysis was completed for the existing generator service yard on the project site.<sup>113</sup> The proposed project involves the expansion of the existing generator service yard within the same area; therefore, the same geotechnical conditions would be present in the area of the planned expansion.<sup>114</sup> The analysis examined underlying soils of the project site and made preliminary geotechnical recommendations related to excavation operations on the project site. In 2013, four additional borings were taken on-site that included similar information to that obtained from the earlier borings, including depth to groundwater and soil composition.

The San Francisco General Plan Community Safety Element contains maps that show areas of the City subject to geologic hazards. The project site is located in an area subject to “moderate damage” from earthquakes along the San Andreas Fault (Map 2 of the Community Safety Element) and “non-structural damage” from earthquakes along the Northern Hayward Fault (Map 3). No active faults are known to pass through the site based on the most recent compilation of Quaternary-active faults prepared by the USGS.<sup>115</sup> However, it is likely that the site would experience periodic minor or major earthquakes associated with a regional fault. The 2007 Working Group on California Earthquake Probabilities estimates that there is a 63 percent chance that a magnitude 6.7 or greater earthquake will occur in the San Francisco Bay Area within 30 years. Like the entire San Francisco Bay Area, the project site is subject to groundshaking in the event of an earthquake. A site-specific seismic design analysis<sup>116</sup> considered the nature and extent of soils underlying the site in its determination and found that strong ground shaking could result from a major seismic event on the San Andreas fault (10 kilometers (km) northeast), the San Gregorio fault (17.5 km northeast), or the Hayward fault (20 km southwest) and that the potential for fault rupture at the site is low.

Groundshaking associated with an earthquake on one of the regional faults around the project site may result in ground failure, such as that associated with soil liquefaction,<sup>117</sup> lateral spreading,<sup>118</sup> and cyclic densification.<sup>119</sup> The project site is located in an area of probable liquefaction potential, as shown in the Community Safety Element of the General Plan (Map 4, titled “Hazards Study Zones—Areas of Liquefaction

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<sup>113</sup> Kleinfelder Inc, 1999.

<sup>114</sup> Kleinfelder, Inc, 2013.

<sup>115</sup> Graymer, R.W. Brynat, C.A. McCabe, S. Hecker, C.S. Prentice, 2006, Map of Quaternary Active Faults in the San Francisco Bay region. U.S. Geological Survey Scientific Investigation Map 2919, Google Earth digital version.

<sup>116</sup> Kleinfelder Inc., 1999

<sup>117</sup> Liquefaction is a phenomenon in which saturated, cohesionless soil experiences a temporary loss of strength due to the buildup of excess pore water pressure, especially during cyclic loading such as that induced by earthquakes. Soil most susceptible to liquefaction is loose, clean, saturated, uniformly graded, fine-grained sand and silt of low plasticity that is relatively free of clay.

<sup>118</sup> Lateral spreading is a phenomenon in which surficial soil displaces along a shear zone that has formed within an underlying liquefied layer. Upon reaching mobilization, the surficial blocks are transported downslope or in the direction of a free face by earthquake and gravitational forces.

<sup>119</sup> Soil compaction, or cyclic densification, is a phenomenon in which non-saturated, cohesionless soil is densified by earthquake vibrations, causing settlement.

Potential"). Preliminary site exploration included five soil borings completed in January 1999.<sup>120</sup> Based on the information obtained from the borings, there are several feet of fill in the generator service yard area, underlain by an intermixture of sandy silt, sand, clayey sand, and sandy clay extending down to the maximum explored depth of 21 feet. The consistency of the solids varied from medium stiff to very stiff for clayey and silty soils and loose to dense for sandy soils. Groundwater was encountered at a depth of approximately 10 feet and the sand layer encountered at that depth was judged to be coarser and cleaner than the underlying sand layer. Based on laboratory test results on these borings, the sandy soils encountered below the groundwater level contained a minimum of 12 percent fines. Based on a liquefaction analysis of this material, it was determined that this soil was not susceptible to liquefaction.

Foundation settlements were projected to be primarily elastic with the majority occurring upon application of the loads on the foundation. Total and differential settlements for continuous and/or isolated spread footings are estimated to be less than 1 and ½ inch, respectively.

The project site is not in an area of potential landslide hazards (Map 5)<sup>121</sup> based on the official State of California Seismic Hazards Zone Map for San Francisco prepared under the Seismic Hazards Mapping Act of 1990.<sup>122</sup>

The final building plans would be reviewed by DBI. In reviewing building plans, DBI refers to a variety of information sources to determine existing hazards and assess requirements for mitigation. Sources reviewed include maps of Special Geologic Study Areas and known landslide areas in San Francisco as well as the building inspectors' working knowledge of areas of special geologic concern. Potential geologic hazards would be addressed during the permit review process through these measures. To ensure compliance with all Building Code provisions regarding structure safety, when DBI reviews the geotechnical report and building plans for a proposed project, they will determine the adequacy of necessary engineering and design features. Past geological and geotechnical investigations would be available for use by DBI during its review of building permits for the site. Also, DBI could require that additional site-specific soils report(s) be prepared in conjunction with permit applications, as needed. Therefore, potential damage to structures from geologic hazards on the project site would be avoided through DBI's requirement for a geotechnical report and review of the building permit application pursuant to DBI implementation of the Building Code, and this impact would be less than significant.

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

The proposed project would not substantially change the general topography of the site. Excavation would be limited to the areas necessary to construct the additional generator pads and new southern elevation for Building B. A maximum excavation depth of four feet or less is anticipated to construct the continuous spread footings for the new building wall and mat slab foundation for the new generator pads. The sound attenuation wall constructed in accordance with **Mitigation Measure M-NO-1 –Attenuation of**

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<sup>120</sup> Kleinfelder Inc., 1999.

<sup>121</sup> City and County of San Francisco, Community Safety Element, *General Plan*, April 1997.

<sup>122</sup> The Seismic Hazards Mapping Act was developed to protect the public from the effects of strong ground shaking, liquefaction, landslides, or other ground failure, and from other hazards caused by earthquakes. This act requires the State Geologist to delineate various seismic hazards zones and requires cities, counties, and other local permitting agencies to regulate certain development projects within these zones.

**Noise from Outdoor Equipment** may require pier footings, to a yet-to-be determined depth. However, these excavation activities would not result in the loss of topsoil as the loss and disturbance of the native topsoil likely occurred during the previous building and site improvements.

The project site is greater than one acre and therefore, the project sponsor would generally be required to obtain a General Construction NPDES permit. The project sponsor would be required to develop and comply with a SWPP including BMPs as required by the General Construction permit. Implementation of erosion control BMPs, such as use of sandbags, straw bales, soil stabilizers, and avoiding soil disturbance during wet weather, would minimize the impacts of erosion during construction. Installation of the new pavement and structures, along with a stormwater collection system would prevent loss of topsoil and erosion on the project site upon completion of construction. Implementation of the erosion and sedimentation control BMPs combined with the on-site stormwater collection system would minimize short-term construction-related erosion impacts and long-term operational impacts and ensure that they would be less than significant.

**Impact GE-3: The proposed project would not result in impacts to site topographical features. (Less than Significant)**

The existing topography of the project site includes an approximately 60-foot-high grade change from the elevation of Paul Avenue along the project site's frontage to the back two buildings (Buildings A and B). The majority of the slope occurs within the first 100 feet from Paul Avenue, outside of the area where the planned improvements would be constructed. With the exception of the front sloped area, the remainder of the site is gently sloping towards the rear property line. There are no remarkable topographic features present on the site. Thus, the proposed project's impacts on the project's site topographical features would be less than significant.

**Impact C-GE-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would not have a cumulatively considerable contribution to a significant cumulative geologic and soils impact. (Less than Significant)**

Geologic impacts are generally site specific and in this setting would not have cumulative effects with other projects. Therefore, the project would not have a considerable contribution to related cumulative impacts. In addition, the building plans of planned and foreseeable projects would be reviewed by DBI, and potential geologic hazards would be avoided during the DBI permit review process. Therefore, the cumulative impacts of the project related to geology, soils, and seismicity would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>E.15. Hydrology and Water Quality</b>					
Would the project:					
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The project would not include the construction of housing; therefore, topic E.15.g does not apply.

**Impact HY-1: The proposed project would not violate water quality standards or otherwise substantially degrade water quality, nor 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. (Less than Significant)**

As discussed in Section E.11, Utilities and Service Systems, the project site's wastewater and stormwater would be discharged into the City's combined stormwater and sewer system, as it does currently, which is then treated in accordance with the City's NPDES Permit effluent discharge standards for the Southeast Water Pollution Control Plant (SEWPCP) prior to discharge into the Bay. As the new impervious surface of the concrete pads and parking lot improvements would replace the existing impervious surfaces of the building roof and parking lot pavement, no increase is anticipated in the volume of stormwater runoff generated by the proposed project. The increased occupancy of the expanded ISE facility would result in a negligible increase in the generation of wastewater which is treated along with stormwater runoff at the SEWPCP. Therefore, the project would have a less-than-significant impact on the permitted Capacity of the SEWPCP.

The project would need to comply with the City's Stormwater Management Ordinance that would ensure the project would not adversely impact water quality. As the project would involve activity disturbing more than 5,000 square feet of ground surface, a Stormwater Control Plan would be required to be submitted demonstrating how the project would meet the stormwater control criteria in the City's Stormwater Control Design Guidelines. For sites with greater than 50 percent impervious area, the Design Guidelines currently require that the stormwater runoff rate and volume be decreased by 25 percent from the existing conditions for a two-year 24-hour storm. The project would need to incorporate a combination of structural and/ or non-structural best management practices to accomplish this. These measures would be required to be submitted on a Stormwater Control Plan submitted with the site or building permit.

The ISE expansion project includes the phased installation of 18 diesel backup diesel generators on new concrete pads in the expanded generator service yard. Double-walled aboveground fuel tanks would be used to hold fuel at the base of each generator and would have leak detection and monitoring features to prevent accidental spills into the City's stormwater collection system. Additionally, the refueling process would adhere to all applicable regulations, including the temporary covering of storm inlets during the refueling process, in order to prevent the accidental discharge of diesel fuel into the stormwater collection system. Measures to prevent accidental spills are included in the Spill Prevention, Control & Countermeasures Plan<sup>123</sup> approved for the existing facility. Therefore, the project would have a less-than-significant impact on the degradation of water quality due to operation of the ISE expansion.

During the construction phase, there would be a potential for erosion and the transport of soil particles during site preparation and excavation. Once in surface water runoff, sediment and other pollutants could leave the construction site and drain into the combined sewer and stormwater system, necessitating treatment at the SEWPCP prior to discharge into the Bay. To minimize sediments and other pollutants from entering the combined sewer and stormwater system, a SWPP and Erosion and Sediment Control Plan would be required to be prepared for the project in accordance with the Public Works Code to minimize stormwater runoff and erosion impacts from construction-related project activities.

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<sup>123</sup> ATC Associates, Incorporated, *Spill Prevention, Control & Countermeasures Plan for Digital Realty Trust 200 Paul LLC Data Center*, Revised July 27, 2010.

As discussed above, during both operation and construction, the proposed project would be required to comply with all local wastewater discharge and water quality requirements. As such, the proposed project would not substantially degrade water quality or contaminate a public water supply. Therefore, the proposed project would not violate water quality standards or substantially degrade water quality, and impacts on water quality would be less than significant.

**Impact HY-2: The proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. (Less than Significant)**

Groundwater is not used as a drinking water supply in the City and County of San Francisco. Approximately 309,000 square feet, or 100 percent, of the project site is covered with impervious surfaces, including the four buildings, the concrete generator service yard area, and the asphalt and concrete driveway and parking lot. As reported in the geotechnical investigation, groundwater on the project site was encountered at an elevation of 10 feet bgs.<sup>124</sup> Some fluctuations in groundwater levels may occur depending on factors such as seasonal rainfall, groundwater withdrawal, and construction activities on this or adjacent properties.

Based on the anticipated maximum anticipated excavation depth of four feet bgs for the new building wall and concrete pads, dewatering will not be necessary the construct these improvements as the potential of encountering groundwater during excavation is low. As the depth of the piers necessary to support the sound attenuation wall required as part of the implementation of **M-NO-1: Attenuation of Noise from Outside Equipment** is unknown, there may be the potential to encounter groundwater during the construction of the pier foundation if they extend to a depth close to 10 feet bgs. Any encounter of groundwater during construction has the potential to impact water quality. However, the project would be subject to the regulations and requirements of the City's Sewer Use Ordinance (Ordinance Number 19-92, amended 116-97), as supplemented by Department of Public Works Order No. 158170, requiring that if groundwater is encountered during excavation activities that a permit be obtained from the Wastewater Enterprise Collection System Division of the SFPUC

Any impacts to groundwater are minimized through the implementation of this permit process that involves the following: A permit is issued only if an effective pretreatment system is maintained and operated. Each permit for such discharge shall contain specified water quality standards and may require the project sponsor to install and maintain meters to measure the volume of the discharge to the combined sewer system. If dewatering were to be required during construction, any effects related to lowering the water table would be temporary and would not be expected to substantially deplete groundwater resources.

The proposed project would also not require long-term, continuous dewatering following construction. The concrete generator pads and new southern building wall foundation would be waterproofed to prevent groundwater seepage and constructed to withstand the hydrostatic pressure of the groundwater. The specifications for protection against long-term groundwater intrusion are outlined in the geotechnical investigation for the proposed project and will be reviewed by DBI as part of the building permit process.

The project site is currently covered with approximately 309,000 square feet of impervious surface that would not change as a result of the project nor would the amount of potential groundwater recharge. Therefore, the

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<sup>124</sup> Kleinfelder Inc., 1999.

proposed project would not have any impact on the depletion of groundwater or groundwater recharge on the project site.

**Impact HY-3: The proposed project would not result in altered drainage patterns that would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site or result in substantial erosion or siltation on- or off-site. (Less than Significant)**

The proposed project would alter on-site drainage, yet the rate and potential volume discharged into the City's combined storm and sanitary sewer system would be reduced through implementation of the Stormwater Management Ordinance which requires a 25 percent reduction from the existing conditions for a two-year 24-hour storm. To achieve this, the project would implement and install appropriate stormwater management systems and/ or BMPs that retain runoff on-site, reducing the volume and rate of stormwater runoff from the project site into the City's combined stormwater and sewer collection system. Additionally, preparation and implementation of a Sediment and Erosion Control Plan would be required as part of the site permit process and would reduce the potential for on- and off-site siltation and erosion.

There are no streams on the project site, though a historic stream was relocated from the west to the east side of the site in the 1940s and 50s and has been channelized into a piped off-site system. No changes are planned that would impact this relocated stream channelization.

Therefore, implementation of the City's Stormwater Management Ordinance and preparation and implementation of a Sediment and Erosion Control Plan would result in the project having a less-than-significant impact on the amount or rate of surface runoff on- and off-site in a manner that would result in flooding or substantial erosion and siltation.

**Impact HY-4: The proposed project would not expose people or structures to substantial risk of loss due to flooding or place structures in a flood hazard zone. (Less than Significant)**

At the federal level, flood risk assessment and flood protection projects are primarily conducted by the Federal Emergency Management Agency (FEMA) and the U.S. Army Corps of Engineers (Corps). FEMA coordinates with local governments to implement the National Flood Insurance Program (NFIP). The NFIP is responsible for creating detailed maps, known as Flood Insurance Rate Maps (FIRMS) that identify areas prone to flood risks and coastal hazards such as high tide events and tsunamis, and the probability of such events. FEMA refers to the flood plain that is at risk from a 100-year flood (the flood event with a one percent change of occurring in any given year) as a special flood hazard area (SFHA).

Because FEMA has not previously published a FIRM for the City and County of San Francisco, there are no identified SFHAs within San Francisco's geographic boundaries. FEMA has completed the initial phases of a study of the San Francisco Bay. On September 21, 2007, FEMA issued a preliminary FIRM of San Francisco for review and comment by the City. The City has submitted comments on the preliminary FIRM to FEMA. FEMA anticipates publishing a revised preliminary FIRM in early 2014, after completing the more detailed analysis that was requested by the Port of San Francisco and City staff. After reviewing comments and appeals related to the revised preliminary FIRM, FEMA will finalize the FIRM and publish it for flood insurance and floodplain management purposes. Because FEMA has not yet published a FIRM for the City, the City Administrator's Office has created an "Interim Floodplain Map" based on preliminary data provided by FEMA showing floodplains within the City.



FEMA has tentatively identified SFHAs along the City's shoreline in and along San Francisco Bay consisting of Zone A (in areas subject to inundation by tidal surge) and Zone V (areas of coastal flooding subject to wave hazards).<sup>125</sup> The San Francisco Board of Supervisors passed a floodplain management ordinance in 2008 as part of the City's effort to join the NFIP. The ordinance governs new construction as well as substantial improvements in flood prone areas of San Francisco, and authorizes the City's participation in NFIP upon passage of the ordinance. Specifically, the proposed floodplain management ordinance includes a requirement that any new construction or substantial improvement of structures in a designated flood zone must meet the flood damage minimization requirements in the ordinance. The NFIP regulations allow a local jurisdiction to issue variances to its floodplain management ordinance under certain narrow circumstances, without jeopardizing the local jurisdiction's eligibility in the NFIP. However, the particular projects that are granted variances by the local jurisdiction may be deemed ineligible for federally backed flood insurance by FEMA.

The floodplain management ordinance was amended in 2010, and currently DPW and other applicable City departments and agencies have begun implementation for new construction and substantial improvements in areas shown on the Interim Floodplain Maps.<sup>126</sup> According to the Interim Floodplain map for the City, the project site is not located within a potential flood zone.<sup>127</sup> The San Francisco Public Utilities Commission has identified large areas of the City that are prone to localized flooding during wet weather (and sometimes during dry weather) because streets and/or building basements are below the grade of the adjacent sewer lines, which transport both wastewater and stormwater. The project site is not within this flood-prone zone, though the possibility of localized flooding cannot be ruled out. If necessary, the SFPUC, as part of the building permit review process of DBI, reviews project plans and makes recommendations regarding how to prevent future flooding. Requirements may include the provision of a pump station for the sewage flow, raised elevation of entryways, and/or special sidewalk construction and provision of deep gutters. Therefore, with SFPUC's review and recommendations, the proposed project would result in less-than-significant impacts related to flooding.

**Impact HY-5: The proposed project would not expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow. (No Impact)**

The project site is not on the San Francisco 20-foot Tsunami Runup Map (Map 6 in the Community Safety Element of the City's General Plan) and, therefore, no significant tsunami hazards exist at the project site. A seiche is an oscillation of a water body, such as a bay, which may cause local flooding. A seiche could occur on the Bay due to seismic or atmospheric activity. However, based on the historical record, seiches are rare and there is no significant seiche hazard at the site. Mudflows consist of rapid landslides with high volumes of water that can be associated with dam releases or volcanic eruptions. The project topography and geologic environment does not include characteristics that are generally subject to mudflows. Thus, there would be no impacts from mudflow hazard. There is no mudslide hazard at the project site because the site and vicinity are fully-developed with no erosion-prone slopes. Thus, there would be no project-related significant impacts from seiche, tsunami or mudflow hazard.

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<sup>125</sup>City and County of San Francisco, Office of the City Administrator, National Flood Insurance Program Flood Sheet, <http://sfgsa.org/index.aspx?page=828>, accessed May 30, 2012.

<sup>126</sup>City of San Francisco, Office of the City Administrator, *San Francisco Floodplain Management Program Fact Sheet*, Revised January 25, 2011.

<sup>127</sup>City and County of San Francisco, Risk Management, San Francisco Floodplain Management Program, Interim Floodplain Map, Final Draft, July 2008, <http://sfgsa.org/Modules/ShowDocument.aspx?documentid=1761>, accessed August 10, 2012.

**Impact C-HY-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the site, would not have a cumulatively considerable contribution to a significant cumulative impact to hydrology and water quality. (Less than Significant)**

There are several approved projects and reasonable foreseeable future projects within a quarter-mile radius of the project site, as identified in Table 2 on p. 22. Given the discussion above, the proposed project would not have a significant impact on water quality standards, groundwater, drainage, or runoff and would not contribute considerably to cumulative impacts in this area. Flood and inundation hazards are site-specific; thus, the proposed project would not have considerable cumulative impacts. However, other proposed developments in the project area, in combination with the proposed project, could result in intensified uses and a cumulative increase in wastewater generation, which would increase pollutant loads at the City's wastewater treatment facilities. As discussed in Section E.11, Utilities and Service Systems, the SFPUC, which provides wastewater treatment in the City, has accounted for such growth in its service projections. Thus, the project's contribution to any cumulative impacts on hydrology and water quality would be less-than-significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>E.16. Hazards and Hazardous Materials</b>					
Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
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 for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The project site is not within an airport land use plan area, nor is it in the vicinity of a private airstrip; therefore, topics E.16.e and E.16.f do not apply to the proposed project.<sup>128</sup> In addition, there are no schools within one-quarter mile of the project site; therefore, topic E.16.c does not apply to the proposed project.

**Impact HZ-1: The proposed project would not create a significant hazard through routine transport, use, disposal, handling or emission of hazardous materials. (Less than Significant)**

The expansion of the ISE would include the enlargement of the generator service yard to allow for an additional 18 backup diesel generators with integrated fuel tanks. These 4,000-gallon, concrete-encased diesel fuel tanks would be aboveground tanks located under the generators with a double containment system and two-hour fire-rated in order to conform with all applicable state, and local codes. Diesel fuel for the generators would be delivered to the site by operators licensed in the handling of diesel fuel. A Spill Prevention, Control and Countermeasures Plan (SPCC) was prepared for the property in 2010<sup>129</sup> and outlines how hazardous materials, including the refueling of the diesel tanks, would be performed to conform with all applicable oversight regulations. SPCC Plans are required to be updated when any material changes are made to the facility, such as the addition of fuel tanks, and must be revised every five years. Therefore, the proposed project would need to update its SPCC Plan in compliance with federal regulations and to ensure that all potential discharge of hazardous materials would be minimized.

San Francisco ensures fire safety primarily through provisions of the Building Code and the Fire Code. The design of the generator service yard expansion would be reviewed by the San Francisco Fire

<sup>128</sup> City/County Association of Governments, *San Mateo County Comprehensive Airport Land Use Plan*, December 1996.

<sup>129</sup> ATC Associates Inc., *Spill Prevention, Control and Countermeasures Plan*, July 27, 2010. This document is available to view at 1650 Mission Street, Suite 400, San Francisco.

Department and DBI in order to ensure conformance with these Code provisions. In this way, emergency measures to respond to potential fire hazards, such as appropriate placards and access, would be established as part of the permit review process.

Expansion of the generator service yard and occupancy of the vacant building area by ISE tenants would involve the use of common hazardous materials, such as cleaners and paint. These products are labeled to inform users of potential risks and to instruct them in appropriate handling procedures. Most of these materials are consumed through use, resulting in relatively little waste. Businesses are required by law to ensure employee safety by identifying hazardous materials in the workplace, providing safety information to workers who handle hazardous materials, and adequately training workers.

For these reasons, hazardous materials used during the operation of the expanded ISE would not pose any substantial public health or safety hazards related to hazardous materials. The proposed expansion of the ISE use would not generate the emission or production of hazardous materials. Thus, the proposed project would have a less-than-significant impact on hazards produced by the routine use, disposal, handling, and emission of hazardous materials.

**Impact HZ-2: Construction and operation of the proposed project would not expose the public or the environment to reasonably foreseeable upset and accidental conditions involving the release of hazardous materials nor is the site included on a list of hazardous materials sites that could create a significant hazard to the public or environment. (Less than Significant)**

A Phase I Environmental Site Assessment (ESA) was prepared by ENSR International in 2004<sup>130</sup> after improvements were completed and the existing facility began operation as an ISE. An extensive site cleanup consisting of two underground storage tanks and associated soil and removal of hazardous building materials, such as lead, asbestos, and PCBs, from all the existing buildings had been completed as noted in an ESA completed by EMG in July 2000.<sup>131</sup> The 2000 ESA found that no significant recognized environmental conditions or regulatory compliance issues exist based on its site visit, review of governmental environmental databases and files, previously-prepared reports, and historical documents, and interviews conducted with selected building owner representatives and the City's DBI representatives.

The ESA noted that abatement of hazardous building materials identified in an earlier May 1997 ESA<sup>132</sup> by Terra Firma had been completed. This included the removal of materials from all on-site buildings of asbestos-containing materials in vinyl asbestos tile and associated mastic and thermal roofing on Building F, lead-based paint from building surfaces, and PCB-containing light ballasts.

An earlier 1997 ESA also identified the location of two abandoned underground storage tanks (UST) in an area of at the north end of the project site. During the subsurface investigation of these tanks, soil borings found oil-range hydrocarbon-contaminated soil and low levels of toluene in the sampled groundwater. The toluene level was determined to be below regulatory action level. Subsequently, the soil and tanks were

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<sup>130</sup> ENSR Corporation, *Phase 1 Environmental Site Assessment of San Francisco Wave Exchange LLC 200 Paul Avenue San Francisco, California*, September 2004. Available for review at Suite 400, 1650 Mission Street, San Francisco, CA 94103.

<sup>131</sup> EMG, *Phase 1 Environmental Site Assessment of 200 Paul Avenue*, July 17, 2000. This document is available to view at 1650 Mission Street, Suite 400.

<sup>132</sup> Terra Firma, *Environmental Site Assessment Report for 200 Paul Avenue*, June 5, 1997. This document is available to view at 1650 Mission Street, Suite 400.

removed and disposed of in accordance with DPH regulations and a remedial action completion certification for the tank closures and soil cleanup was issued on January 29, 2001.

The 2004 ESA also noted that a water and glycol spill on the fourth floor of Building F had been properly abated and no evidence of mold was found. A search of regulatory databases found the former RH Macy & Co. in the Resource Conservation and Recovery Act Information System (RCRIS) database as a generator of hazardous waste, though no violations were found. The property is listed on the Haznet database and indicates that asbestos- and PCB-containing waste have been generated on site and that both had been disposed. No Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), Resource Conservation and Recovery Act Information System - Treatment, Storage, and Disposal Facilities (RCRIS-TSD), or landfills within ½ mile of the project site were found. According to the project sponsor, no spills have occurred since the 2004 ESA and there are no open investigations.<sup>133</sup> Construction of the ISE expansion would not be anticipated to disturb any hazardous materials during the demolition of the portion of Building B and the installation of the concrete pads for the new generators. Therefore, the construction and operation of the ISE would not be expected to expose the public or environment to hazardous building materials or contaminated soils, and the impact related to hazardous materials exposure would be less than significant.

**Impact HZ-3: The proposed project would not physically interfere with an adopted emergency response plan or evacuation plan. (Less than Significant)**

The implementation of the proposed ISE expansion would add an additional five employee vehicles to the roadways in the immediate area in the event of an emergency evacuation. This would be a negligible increase within the dense urban setting of the project site, and traffic would be dispersed within the existing street grid such that there would be no significant adverse effects on nearby traffic conditions potentially impeding emergency response vehicles. The proposed changes to the parking lot design would provide a vehicular connection between the western and eastern parking areas which currently does not exist and would allow better on-site circulation for emergency vehicles. However, a gate is proposed to be installed that would restrict access to this area. A lockbox or other mechanism to provide access to emergency personnel would be provided so that emergency vehicles could use this driveway. Therefore, emergency access to the generator yard, and between parking lots in the event of an emergency, would be improved as a result of the project. In addition, the project would be subject to the San Francisco Fire Department's Administrative Bulletin 2.11 requiring the posting of evacuation route signage. Therefore, the proposed project would have a less-than-significant impact on the impairment and implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

**Impact HZ-4: The proposed project would not expose people or structures to a significant risk of loss, injury, or death involving fires. (Less than Significant)**

San Francisco ensures fire safety and emergency accessibility within new and existing developments through provisions of its Building and Fire Codes. The proposed ISE expansion project would conform to these standards, which may include development of an emergency procedure manual and an exit drill plan for the proposed development. Potential fire hazards (including those associated with emergency diesel backup generators and blocking of emergency access points) would be addressed during the permit review process.

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<sup>133</sup> Email from Gregg Miller to Heidi Kline, 200 Paul - 2012.0153EC - HMMP and Small Plan Set, dated May 21, 2013.

Conformance with these standards would ensure appropriate life safety protections. Consequently, the project would have a less-than-significant impact related to fire hazards.

**Impact C-HZ-1 The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the site, would not have a cumulatively considerable contribution to a significant cumulative hazards and hazardous materials impact. (Less than Significant)**

There are several approved projects and reasonable foreseeable future projects within the project vicinity, as identified in Table 2 on p. 22. Impacts from hazards are generally site-specific, and typically do not result in cumulative impacts. Any hazards present at or near the cumulative project sites would be subject to the same safety requirements discussed for the proposed project above, which would reduce any cumulative hazard effects to levels considered less than significant. Therefore, the proposed project would not have a considerable contribution to a significant cumulative impact related to the hazards and hazardous materials.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>E.17. Mineral and Energy Resources</b>					
Would the project:					
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Impact ME-1: The proposed project would not result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site. (No Impact)**

All land in the City and County of San Francisco, including the project site, is an urbanized area and is designed Mineral Resource Zone 4 (MRZ-4) by the California Division of Mines and Geology (CDMG) under the Surface Mining and Reclamation Act of 1975 (CDMG, Open File Report 96-03 and Special Report 146 Parts I and II). This designation signifies that there is inadequate information available for assignment to any other MRZ, and the project site is not a designated area of significant mineral deposits. Since the project site does not contain any known mineral resources and the proposed project would involve excavation up to four feet in depth in limited areas, the proposed project would not adversely affect mineral resources, either directly or indirectly as no known mineral resources are present at the site at these depths. Moreover, the project would not 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. The implementation of the proposed project

would not result in the loss of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

**Impact ME-2: The proposed project would not encourage activities that result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner. (Less than Significant)**

The proposed ISE expansion would include the construction of energy-using facilities. Both the backup diesel generators and the ISE uses in the expanded facility would consume energy resources. While ISE uses consume large amounts of energy when factoring in computer servers and cooling equipment, these uses would employ energy efficiency features to prevent the wasteful use of electricity. These energy efficiency measures include computer room handlers with variable speed drives controls and high-efficiency motors, transformer-free uninterrupted power supplies for more energy-efficient power conditioning, and the use of ASHRAE TC-9.9 Thermal Guidelines for Data Processing Environments that allow higher supply and cooling temperatures and broader humidity ranges. The project sponsor has calculated that as a result of its implementation of the above efficiency measures, the facility would operate with a PUE of 1.5 that is less than its industry peers' average self-reported PUE of 1.8 to 1.89 for existing multi-customer and multi-story data centers. Therefore, the proposed ISE expansion would not use encourage activities that use fuel, water, or energy in a wasteful manner, and the project would have a less-than-significant impact on the use of large amounts of fuel and energy.

The proposed ISE expansion would not involve the use of large amounts of water. Rather, any additional water usage associated with the project would for use by the additional 25 employees in the facility's restrooms and eating areas. The project would be required to comply with the City's Green Building ordinance that requires water-conserving measures be incorporated into new improvements. Therefore, the project would not involve the use of large amounts of water in a wasteful manner.

**Impact C-ME-1: The proposed project in combination with other past, present or reasonably foreseeable projects in the site vicinity would not result in a cumulatively considerable contribution to significant impacts related to energy resources. (Less than Significant)**

As discussed in Impact ME-1, above, no known minerals exist at the project site, and therefore the proposed project would not contribute to cumulative impacts on mineral resources.

In December 2002, the City adopted the Electricity Resource Plan, which includes strategies for maximizing energy efficiency, developing renewable power, and ensuring reliable power. In response to the Board of Supervisors' guidance in their 2009 Ordinance 94-09, the SFPUC has developed an updated Electricity Resource Plan.<sup>134</sup> This update identifies proposed recommendations to work towards achieving the broad policy goals laid out in the 2002 Plan. These efforts, together with conservation, will be part of the statewide effort to achieve energy sufficiency. As described above, while the project could generate demand for electricity by enabling the expansion of an existing ISE, an inherently energy-intensive use, energy efficiency measures have been employed in the operation of the existing ISE in order to minimize any wasteful energy use. Although other energy-intensive uses are planned within the immediate area, such as the new data center at 400 Paul Avenue, similar energy efficiency measures have been proposed for use in that facility as

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<sup>134</sup> SFPUC, *San Francisco's Updated Electricity Resource Plan*, Draft, March 2011, Executive Summary, pp. 1-20.

well. Additionally, the BVHP FEIR.<sup>135</sup> evaluated the consumption of energy needed for both the construction and operation of new buildings resulting from the rezoning that allowed for an additional 2.4 million square feet of commercial, office, and industrial use and 3,700 dwelling units. It found that due to the required compliance of these new buildings with the Title 24 Energy Efficiency Standards during the building permit review process by DBI, the additional energy consumption would not require significant additional capacity in the area and would not result in an adverse effect on the environment.

Thus, the proposed project would not have a cumulatively considerable contribution to a significant cumulative impact on energy resources.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
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### E.18. Agriculture and Forest Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)) or timberland (as defined by Public Resources Code Section 4526)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<sup>135</sup> Bayview Hunters Point Redevelopment Projects and Rezoning Final EIR, 2006.



**Impact AF-1: The proposed project would not convert farmland or forest land to non-farm or non-forest use, nor would it conflict with existing zoning for agricultural uses or forest land. (No Impact)**

The proposed project is located within a developed and wholly urbanized area of San Francisco. The California Department of Conservation's Farmland Mapping and Monitoring Program identifies the site and all of San Francisco as "Urban and Built-up Land."<sup>136</sup> There are no farmlands or forest land identified in San Francisco; thus, the project site has no agriculture and forest resources. Because the project site does not include agricultural uses and is not zoned for such uses, the proposed project would not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. The proposed project would not conflict with existing zoning for agricultural uses or a Williamson Act contract. In addition, the proposed project would not conflict with existing zoning for forest land or timberland or result in the rezoning of forest land or timberland. The proposed project would not involve other changes to the existing environment that could result in conversion of farmland or forest use to non-forest use.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>E.19. Mandatory Findings of Significance</b>					
Would the project:					
a) Have the potential to 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, 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have impacts that would be 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.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<sup>136</sup> California Department of Conservation, Farmland Mapping and Monitoring Program, *Bay Area Region Important Farmland 2004 and Urbanization 1984-2004*. Available at [http://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/statewide/2006/fmmp2006\\_08\\_11](http://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/statewide/2006/fmmp2006_08_11). Accessed on April 24, 2012.

As discussed in the various topics in this Initial Study, the proposed project, as mitigated, is anticipated to have less-than-significant impacts in the areas discussed. The foregoing analysis identifies significant impacts related to cultural resources, noise, and air quality that would be reduced to a less-than-significant level through implementation of mitigation measures as described below.

- a. The proposed project would not have the potential to degrade the quality of the environment for topics such as aesthetics, greenhouse gas emissions, biological resources, geology and soils, hydrology, hazardous materials, and water quality, mineral and energy resources, and agriculture and forest resources. All impacts would be less than significant. With regards to cultural resources (Impacts CP-2, CP-3, and CP-4), noise (Impact NO-1), and air quality (Impacts AQ-2, AQ-4, and C-AQ-1), with the incorporation of the identified mitigation measures (M-CP-2, M-NO-1, M-AQ-2, and M-AQ-4, and respectively), all impacts would be reduced to a less-than-significant level.

As discussed in Section E.4, Cultural Resources, it is possible that below-ground archaeological resources may be present. Any potential adverse effect to CEQA-significant archaeological resources resulting from soils disturbance from the proposed project would be reduced to a less-than-significant level by implementation of **Mitigation Measure M-CP-2: Archeological Testing Plan**, which addresses the implementation of testing for archaeological resources. Accordingly, with mitigation, the proposed project would result in a less-than-significant impact to archaeological resources. (Impact M-CP-2)

In addition, the proposed project could produce a significant increase in permanent ambient noise levels from the operation of diesel generators. However, implementation of **Mitigation Measure M-NO-1: Attenuation of Noise from Outdoor Equipment** would ensure that the noise from the ISE outside equipment is reduced to a less-than-significant impact. (Impact M-NO-1)

The proposed project would require construction activities for the approximate 6-month construction phase. Project construction activities would result in short-term emissions of diesel particulate matter and other toxic air contaminants that would add emissions to areas already adversely affected by poor air quality. **Mitigation Measure M-AQ-3: Construction Emissions Minimization** requires specific technology that would reduce construction emissions to a less-than-significant level. (Impact AQ-3)

Because the project site is located in an area that already experiences poor air quality, the proposed emergency back-up generator has the potential to expose sensitive receptors to substantial concentrations of diesel emissions, also known as TACs. **Mitigation Measure M-AQ-5a: Retrofit of Existing Diesel Backup Generators** specifies best available control technology for diesel generators that would reduce this impact to a less-than-significant level. (Impact AQ-5)

- b. Cumulative impacts are described under each impact topic analyzed above. As noted in the above analysis, the proposed project would not result in significant cumulative impacts associated with any of the topics except air quality and noise. However, this cumulative impact for air quality (Impact C-AQ-1) would be reduced to a less-than-significant level with incorporation of the identified mitigation measures, M-AQ-3 and M-AQ-5. The cumulative impact for noise (Impact C-NO-1) would be

reduced to a less-than-significant level with incorporation of the identified mitigation measure, M-NO-4)

- c. As identified in this Initial Study, the proposed project would not directly or indirectly cause adverse effects to human beings after implementation of the mitigation measures. Impacts on topics that could affect the human environment such as land use and land use and planning, population and housing, transportation and circulation, wind and shadow, recreation, utilities and service systems, and public services would be less than significant.

## **N. MITIGATION AND IMPROVEMENT MEASURES**

The following mitigation and improvement measures have been adopted by the project sponsor. The following mitigation measures are necessary to reduce the significant effects of the proposed project to a less-than-significant level.

### **Mitigation Measure M-CP-2: Archaeological Testing Plan**

Based on a reasonable presumption that archeological resources may be present within the project area, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried archeological resources. The project sponsor shall retain the services of an archaeological consultant from the rotational Department Qualified Archaeological Consultants List (QACL) maintained by the Planning Department archaeologist. The project sponsor shall contact the Department archaeologist to obtain the names and contact information for the next three archeological consultants on the QACL. 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 ar

cheological consultant's work shall be conducted in accordance with this measure at the direction of the Environmental Review Office (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, 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).

**Consultation with Descendant Communities.** On discovery of an archeological site an appropriate representative of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to consult with ERO 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 Final Archeological Resources Report shall be provided to the representative of the descendant group.

**Archeological Testing Plan.** The archeological consultant shall prepare and submit to the ERO for review and approval an archeological testing plan (ATP). The archeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, the testing method to be used, and the locations recommended for testing. The purpose of the archeological testing program will be to determine to the extent possible the presence or absence of archeological resources and to identify and to evaluate whether any archeological resource encountered on the site constitutes an historical resource under CEQA.

At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the ERO. If based on the archeological testing program the archeological consultant finds that significant archeological resources may be present, the ERO in consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or an archeological data recovery program. If the ERO determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

- A) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or
- B) A data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

**Archeological Monitoring Program.** If the ERO in consultation with the archeological consultant determines that an archeological monitoring program shall be implemented the archeological monitoring program shall minimally include the following provisions:

- The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils- disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the risk these activities pose to potential archeological resources and to their depositional context;
- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;
- The archeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;
- The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archeological monitor

has cause to believe that the pile driving activity may affect an archeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO.

Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO.

**Archeological Data Recovery Program.** The archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will 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 ADRP 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.
- **Interpretive Program.** Consideration of an on-site/off-site public interpretive program during the course of the archeological data recovery program.
- **Security Measures.** Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally 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.

**Final Archeological Resources Report.** The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO 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. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and

the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound, one unbound and one unlocked, searchable PDF copy on CD of the FARR along with copies of 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. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

#### **Mitigation Measure M-NO-1: Attenuation of Noise from Outdoor Equipment**

The project sponsor shall implement the noise attenuation measures in the 200 Paul Rooftop Equipment and Standby Generator Noise Analysis prepared May 14, 2013 by CSDA Design Group that include the following measures. A noise attenuation wall shall be constructed along the entire western edge of the existing and expanded generator service yard with a minimum 60-foot-long return along the northern edge of the service yard. The height of the noise attenuation wall shall extend a minimum of four feet above the highest exhaust stack or portion of the diesel generators in the service yard and shall have a minimum surface density of three pounds per square foot (3 psf) with no gaps or breaks. In order to reduce reflected noise towards the east side of the property, the interior face of the noise attenuation wall shall incorporate acoustically absorptive materials with a minimum Noise Reduction Coefficient (NRC)<sup>137</sup> rating of 0.65. All new generators installed on the 18 concrete pads shall be 4 decibel A-weighting (dBA) quieter than the existing generators which have a measured noise level of 79 dBA at 25 feet and 73 dBA at 50 feet. A detailed design of the noise attenuation wall shall be submitted for review and approval by the Planning Department prior to issuance of a building permit and shall be installed prior to the operation of any of the additional 18 backup generators.

#### **Mitigation Measure M-AQ-2: Construction Emissions Minimization**

*Construction Emissions Minimization Plan.* Prior to issuance of a construction permit, the project sponsor shall submit a Construction Emissions Minimization Plan (Plan) to the Environmental Review Officer (ERO) for review and approval by an Environmental Planning Air Quality Specialist. The Plan shall detail project compliance with the following requirements:

1. All off-road equipment greater than 25 hp and operating for more than 20 total hours over the entire duration of construction activities shall meet the following requirements:
  - a) Where access to alternative sources of power are available, portable diesel engines shall be prohibited;
  - b) All off-road equipment shall have:
    - i. Engines that meet or exceed either U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 2 off-road emission standards, and

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<sup>137</sup> Noise Reduction Coefficient is a measure of the acoustical absorption performance of a material, calculated by averaging its sound absorption coefficients at 250, 500, 1000, and 200 Hz, expressed to the nearest integral multiple of 0.05.

- ii. Engines that are retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy (VDECS).<sup>138</sup>
- c) Exceptions:
  - i. Exceptions to A(1)(a) may be granted if the project sponsor has submitted information providing evidence to the satisfaction of the ERO that an alternative source of power is limited or infeasible at the project site and that the requirements of this exception provision apply. Under this circumstance, the sponsor shall submit documentation of compliance with A(1)(b) for onsite power generation.
  - ii. Exceptions to A(1)(b)(ii) *may* be granted if the project sponsor has submitted information providing evidence to the satisfaction of the ERO that a particular piece of off-road equipment with an ARB Level 3 VDECS is: (1) technically not feasible, (2) would not produce desired emissions reductions due to expected operating modes, (3) installing the control device would create a safety hazard or impaired visibility for the operator, or (4) there is a compelling emergency need to use off-road equipment that are not retrofitted with an ARB Level 3 VDECS and the sponsor has submitted documentation to the ERO that the requirements of this exception provision apply. If granted an exception to A(1)(b)(ii), the project sponsor must comply with the requirements of A(1)(c)(iii).
  - iii. If an exception is granted pursuant to A(1)(c)(ii), the project sponsor shall provide the next cleanest piece of off-road equipment as provided by the step down schedules in Table 5.

**Table 5 – Off-Road Equipment Compliance Step-down Schedule**

Compliance Alternative	Engine Emission Standard	Emissions Control
1	Tier 2	ARB Level 2 VDECS
2	Tier 2	ARB Level 1 VDECS
3	Tier 2	Alternative Fuel*

**How to use the table:** If the requirements of (A)(1)(b) cannot be met, then the project sponsor would need to meet Compliance Alternative 1. Should the project sponsor not be able to supply off-road equipment meeting Compliance Alternative 1, then Compliance Alternative 2 would need to be met. Should the project sponsor not be able to supply off-road equipment meeting Compliance Alternative 2, then Compliance Alternative 3 would need to be met.

\* Alternative fuels are not a VDECS.

- 2. The project sponsor shall require the idling time for off-road and on-road equipment be limited to no more than two minutes, except as provided in exceptions to the applicable state regulations

<sup>138</sup> Equipment with engines meeting Tier 4 Interim or Tier 4 Final emission standards automatically meet this requirement, therefore a VDECS would not be required.

regarding idling for off-road and on-road equipment. Legible and visible signs shall be posted in multiple languages (English, Spanish, Chinese) in designated queuing areas and at the construction site to remind operators of the two minute idling limit.

3. The project sponsor shall require that construction operators properly maintain and tune equipment in accordance with manufacturer specifications.
4. The Plan shall include estimates of the construction timeline by phase with a description of each piece of off-road equipment required for every construction phase. Off-road equipment descriptions and information may include, but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For VDECS installed: technology type, serial number, make, model, manufacturer, ARB verification number level, and installation date and hour meter reading on installation date. For off-road equipment using alternative fuels, reporting shall indicate the type of alternative fuel being used.
5. The Plan shall be kept on-site and available for review by any persons requesting it and a legible sign shall be posted at the perimeter of the construction site indicating to the public the basic requirements of the Plan and a way to request a copy of the Plan. The project sponsor shall provide copies of Plan to members of the public as requested.

*Reporting.* Monthly reports shall be submitted to the ERO indicating the construction phase and off-road equipment information used during each phase including the information required in A(4). In addition, for off-road equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used.

Within six months of the completion of construction activities, the project sponsor shall submit to the ERO a final report summarizing construction activities. The final report shall indicate the start and end dates and duration of each construction phase. For each phase, the report shall include detailed information required in A(4). In addition, for off-road equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used.

*Certification Statement and On-site Requirements.* Prior to the commencement of construction activities, the project sponsor must certify (1) compliance with the Plan, and (2) all applicable requirements of the Plan have been incorporated into contract specifications.

#### **M-AQ-4: Retrofit of Existing Diesel Backup Generators**

The project sponsor or property owner shall retrofit four existing diesel backup generators, referenced as generators S-18, S-19, S-20, and S-21 in its Bay Area Air Quality Management District February 1, 2013 Permit to Operate, with a California Air Resources Board Level 3 Verified Diesel Emissions Control Strategy. A schedule for the retrofitting of these generators prior to or simultaneously with installation of any of the additional diesel backup generators at the project site shall be submitted for the review and approval of the Planning Department prior to the installation of the first generator. The schedule shall be developed so that there shall not be a net increase in emissions at any time during the phased installation of the additional generators.

#### **Improvement Measure I-GHG-1: Reduce GHG Emissions**

The project sponsor or property owner, starting for the year 2014, should annually measure and disclose greenhouse gas (GHG) emission estimates to the San Francisco Planning Department. The annual disclosure



of GHG emission estimates should be submitted to and reviewed and approved by the San Francisco Planning Department and should include GHG emissions from indirect electricity consumption and direct stationary source usage. As part of the disclosure requirements,<sup>139</sup> the project sponsor or property owner should identify any measures taken that have resulted in a reduction in GHG emissions. Measures the project sponsor or property owner could consider to reduce GHG emissions include the following:

- Implement the measures recommended in the energy audit per the San Francisco Commercial Building Energy Performance Ordinance, throughout the entire Internet Services Exchange facility (i.e., not just the space for the proposed project);
- Consider alternative types of backup power that would result in less GHG emissions than diesel generators;
- On-site co-generation (i.e., using waste heat for cooling);
- On-site renewable energy (e.g., solar panels);
- Enroll in PG&E's "Green Option" program;
- Contract/enroll with another electricity provider with lower electricity emissions factors (e.g., SFPUC, CleanPowerSF);
- Purchase renewable energy credits/certificates that can be tracked.

## **G. PUBLIC NOTICE AND COMMENT**

A "Notification of Project Receiving Environmental Review" was mailed on October 3, 2012, to the owners of properties within 300 feet of the project site, to adjacent property occupants, and to neighborhood groups. Residents from the residential neighborhood on the south side of Paul Avenue provided comments concerning construction and operational noise, vibration during demolition, potential wind and feng shui impacts due to massing, traffic, and the potential impact on air quality from the diesel generators. Several residents to the northeast of the project in the 5800 Third Street residential development expressed concern with the impacts of the diesel generators on air quality, noise, and aesthetics. The topics of noise and vibration are addressed in Section E.6. Noise on p. 46, aesthetics in Section E.2 Aesthetics on p.26, wind impacts are addressed in Section E.9. Wind and Shadow on p.87, traffic in Section E.5. Transportation on p. 40, and air quality in Section E.7. Air Quality on p.56. Impacts on feng shui are not considered an environmental impact under CEQA.

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<sup>139</sup> The project sponsor or property owner will be required to comply with the San Francisco Existing Commercial Buildings Energy Performance Ordinance and the conditions of approval per Planning Code 303(h), which requires, among other things, annually measuring energy performance and disclosing that information to the San Francisco Department of Environment and San Francisco Planning Department.

## H. COMMENTS RECEIVED IN RESPONSE TO PMND

A "Notice of Availability of and Intent to Adopt a Mitigated Negative Declaration" was mailed on July 24, 2013 to the owners and occupants within 300 feet of the project site, and interested parties. The Planning Department received five comment letters and emails in response to the notice.

The commenters are divided into two groups: organizations and individuals to facilitate the preparation of responses to these comments, this document assigns a commenter code to each comment letter and email based on the name of the organization or individual submitting the comment. The comment letters and emails are included in Appendix A.

<u>Commenter Code</u>	<u>Name of Agency, Organization, or Person Submitting Comments</u>	<u>Comment Format</u>	<u>Comment Date</u>
<u>Organizations</u>			
<u>O-Brite</u>	<u>Brite - Bayview Residents Improving Their Environment</u>	<u>Letter</u>	<u>August 16, 2013</u>
<u>O-Third</u>	<u>Kenneth A. Catterlin, Chief Financial Officer, 5800 Third Street Owners Association</u>	<u>Letter</u>	<u>August 13, 2012</u>
<u>Individuals</u>			
<u>I-Castleberry</u>	<u>Jason Castleberry</u>	<u>Email</u>	<u>August 13, 2013</u>
<u>I-Froehlich</u>	<u>David Froelich</u>	<u>Email</u>	<u>August 13, 2013</u>
<u>I-Nakamura</u>	<u>Tom and Jane Nakamura</u>	<u>Email</u>	<u>August 12, 2013</u>

### Land Use and Land Use Planning

**Comment 1:** The impact of the project on planned residential growth in the Bayview District and Third Street Corridor should be considered.

"We're also wondering how this project related to the city's expressed desires to increase residential development and quality of life in the Bayview District and Third Street Corridor." O-Brite

"Issue #3- The PMND fails to account for nearby residential uses and the City's stated objectives to increase residential development and quality of life in the Bayview District and Third Street Corridor.

For decades, the Bayview district has lagged economically and environmentally from other regions in the City. Recent progress has been made in improving environmental conditions by, for example, shutting down of the Mirant Power Plant in Potrero Hill and approved renovation of the Southeast Wastewater Treatment Plant, which processes 80 percent of the City's wastewater flows. The Project constitutes a setback to this progress and directly contradicts the City's stated goals of improving quality of life (health, economic opportunity, and safety) in the Bayview. The PMND ignores these objectives and discounts the immediately surrounding residential uses that would suffer from the Project's approval.

The PMND gives little discussion to the impacts on existing residential uses on Paul Avenue and Third Street, which are all well within 500 feet of the project site. Developers have also received final approvals for a third phase of residential development at 5800 Third Street, encompassing 271 multi-family dwelling units in two buildings (one building is

market rate housing, the second is 121 units of low-income senior housing (see above), along with a 15,000-square-foot senior center. These new units will be situated just 125 feet from the project site. Many residents at these units- and those living at existing units at the Armstrong Townhomes and 5800 Third Street condominiums- are lower-income, self-employed, disabled and/or elderly, and will be exposed to diesel exhaust even during routine daytime testing of the project's diesel generators. The PMND does little more than mention these residential uses, while failing to assess the cumulative impacts of exposing residents to substantially increased amounts of diesel exhaust, which have been shown to be damaging to human health.

According to CEQA Guidelines, "the determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved... [and] the significance of an activity may vary with the setting. For example, an activity which may not be significant in an urban area may be significant in a rural area." §15064(b). Here, the Planning Department has not exercised "careful judgment," but rather has glossed over "the setting" in which the Project is proposed. The Project site is not located in an isolated industrial park or in a rural area far outside a population center. Rather, it is a stone's throw away from residences, a Church with a child day care school (True Hope), and retail establishments. These realities should be addressed." O-Third

#### **Response 1:**

The potential environmental impacts of the project on land use and land use planning were evaluated in Section E.1. Land Use and Land Use Planning on p. 24 of the PMND. The project is an expansion of an existing land use and is consistent with the development of the property envisioned in the Bayview Hunters Point Area Plan and San Francisco Planning Code. The Area Plan reaffirmed the existing mixed-use character of this area while allowing for some industrial properties to be redeveloped with residential uses, notably along the Third Street corridor due to its proximity near the Muni Metro T Third light rail line. The data center at 200 Paul Avenue was specifically cited as an existing industrial use that was part of a larger industrial block bounded by Paul Avenue on the south, Bayshore Boulevard on the west, Egbert Street on the north, and Third Street on the east. The PMND found that the proposed project would have a less-than-significant environmental impact on surrounding land uses, including existing and future residential development.

#### **Air Quality**

**Comment 2:** The proposed addition of 18 new diesel backup generators on the project site would have adverse environmental impacts on the Bayview District and Third Street Corridor. The project sponsor should retrofit all 17 existing diesel generators, rather than only four generators.

"Like our neighbors at 5800 Third Street, we have some questions about the environmental impact of the extra generators." O-Brite

"Second, the existing generator retrofit measure is far too lenient to have a substantial mitigating impact on the proposed additional 18 diesel generators (36 generators counting the 400 Paul Avenue project). The mitigation measure calls for retrofit of only four existing diesel backup generators, numbers S-18, S-19, S-20, and S-21. (Id. at 122.) This proposed mitigation is arbitrary and insufficient in light of the fact that the remaining 13 existing generators will be permitted to operate without retrofit or limits on usage. The existing generators have been in operation for several years, and emit diesel exhaust at a far higher rate than newer model generators. The PMND fails to address mitigation the impacts of allowing the older, dirtier generators to continue operation and the combined impact of adding dozens more generators to the emissions mix." O-Third

"I want to echo these points and add that there is opportunity to do more than the minimum when adding and updating these facilities. The exposures our community members already deal with is enough, it shouldn't have to be a hardship placed on residents to mitigate new and worsening exposures. The bottom line is that net zero isn't good enough and shouldn't be good enough knowing what challenges the southeast district's residents already face." I-Castleberry

"As the project whole concerned, the existing generators should be brought into current new generator exhaust standards through retrofitting with exhaust filters or other available methods. 4 of the generators are modified in such manner per the mitigation measures described in the negative declaration. The owner and operator shall further extend the measure to existing to contribute the well-being of the neighborhood and the community environment, already heavily burdened (above the levels enjoyed by the greater parts of San Francisco) with pollution sources including but not limited to the proposed project." I-Nakamura

**Response 2:**

As noted on p. 66 in the PMND, an air quality technical study was prepared for the project to evaluate the potential air quality impacts from an additional 18 diesel generators. The analysis found that four existing diesel generators would need to be retrofitted with Level 3 VDECS exhaust filters to offset the increased emissions that would be produced by the 18 new generators. In doing so, the impact on air quality from the proposed project would be reduced to levels lower than levels under existing conditions. Mitigation measures have been identified that would eliminate any potential significant impact on air quality resulting from the addition of the 18 new generators. CEQA does not require that a project's impact be mitigated to no impact, or to correct problems (referred to as baseline conditions) in existence at the time of project submittal. The retrofit of four of the existing generators would eliminate and avoid any potential significant impact and would reduce the project's impact on air quality to a level similar to existing conditions. Therefore, the City cannot, through the CEQA process, require the project sponsor to undertake additional mitigation measures to correct existing air quality conditions.

**Comment 3:** The proposed addition of 18 new diesel generators would increase levels of diesel particulate matter (DPM) in the Bayview neighborhood.

"The proposed project at 200 Paul Avenue ("the Project") calls for expansion of an existing Internet services exchange, commonly known as a data center, and installation of 18 new diesel backup generators for use by existing and future tenants of the data center. The Project will substantially increase levels of diesel exhaust emissions in a residential area where individuals are already exposed to significant levels of environmental pollutants. For decades, the Bayview district has been forced to bear the brunt of environmental impact for the City's infrastructure and power generation needs. This project represents a disappointing reversal of the recent progress (albeit minimal) in improving air quality standards in the Bayview.

Item #4 - The PMND fails to address the adverse environmental and health impacts from increased emissions of diesel exhaust.

The PMND does not explain the significant human health impacts of exposure to diesel exhaust, nor explore alternative source of backup power generation, for example, through clean technology generators that do not rely on diesel. (See CommScope White Paper on Fuel Cell Technology, at [http://docs.commscope.com/Public/Fuel\\_Cell\\_WhitePaper\\_WP-104050-EN.pdf](http://docs.commscope.com/Public/Fuel_Cell_WhitePaper_WP-104050-EN.pdf)). Since 1998, the California Air Resources Board ("CARB") has identified the particulate matter in diesel exhaust as a Toxic Air Contaminant based on its potential to cause or contribute to cancer, heart and lung disease, poor pregnancy outcomes, premature death, and other health problems. In most areas of California, emissions of diesel exhaust

account for over 80% of the air pollution caused cases of cancer and other health effects. CARB estimated the number of premature deaths associated with exposure to diesel particulate to be 3,500 per year statewide in 2008. (See BAAQMD April 2011 Staff Report, p. 8, at [http://www.baaqmd.gov/media/Files/Planning%20and%20Research/Public%20Hearings/2011/1117\\_sr\\_041811.ashx](http://www.baaqmd.gov/media/Files/Planning%20and%20Research/Public%20Hearings/2011/1117_sr_041811.ashx)). Despite progress made through national air quality standards, urban air pollution remains an important contributor to poor health in many urban areas, including San Francisco, and especially in the Southeast Corridor and the Bayview. Air pollutants result in adverse effects on lung development, asthma, and life-expectancy. Exposure is greater for communities like the Bayview that are situated near pollution sources, such as freeways, distribution centers, and heavy industry, and the elderly, the young, and those with higher rates of respiratory disease are most vulnerable to harm. Controlling urban air pollution and reducing disparities in exposure is necessary for the success of sustainability initiatives that aim to increase the population in existing urban areas and promote active transportation. The PMND does not address these regional and statewide objectives of controlling and reducing air pollution, particularly diesel exhaust, and the Planning Department must do so through further review.” O-Third

**Response 3:**

The PMND includes analysis of the impact of the proposed project on diesel particulate matter (DPM) emissions on p. 67. DPM emissions would be generated by the operation of the 18 new diesel generators, and to a lesser extent new vehicle trips. These two sources are projected to generate 0.027 tons per year (55 lbs per year) of PM<sub>2.5</sub> emissions. However, upon implementation of **Mitigation Measure M-AQ-4: Retrofit of Existing Diesel Backup Generators**, retrofitting four of the existing generators with a Level 3 VDECS particulate filter would reduce PM<sub>2.5</sub> emissions from these four generators by 0.034 tons per year (81 lbs per year). With implementation of this mitigation measure, the proposed project would result in a net reduction of approximately 0.007 tons per year (14 lbs per year) of PM<sub>2.5</sub> emissions. Therefore, upon implementation of **Mitigation Measure M-AQ-4: Retrofit of Existing Diesel Backup Generators**, the PM<sub>2.5</sub> emissions would decrease below existing levels and the project’s impact to nearby sensitive receptors would be reduced to less than significant.

**Comment 4:** The air quality analysis is inadequate because it does not include the proposed data center at 400 Paul Avenue and other existing sources of air pollution in the immediate area.

“Issue #1 - The PMND fails to evaluate the cumulative impacts of the adjacent proposed project at 400 Paul Avenue and other sources of air pollution in close proximity to the Project site.

The PMND contains an insufficient analysis of cumulative environmental impacts, treating the project as a standalone building expansion and installation of 18 diesel generators, rather than one in a series of projects and surrounding uses that together pose significant environmental and health risks to the community. This piecemealing of environment review is improper and fails to adequately evaluate combined adverse effects. In particular, the PMND gives short shrift to the “foreseeable” project at 400 Paul Avenue, immediately adjacent to the Project site. (See PMND, at 22.) The 400 Paul Avenue project- currently in initial stages of environmental review- calls for a new data center comprising 183,560 square feet and an additional 18 diesel backup generators. While it is unclear if the 400 Paul Avenue project is proposed by the same project sponsor, that fact is immaterial to the anticipated combined effect of adding 36 total new diesel generators in the next few years (18 generators at 200 Paul Avenue, and another 18 generators at 400 Paul Avenue) to the already existing 17 generators at 200 Paul Avenue. In total, therefore, by the time the 200 and 400 Paul Avenue projects are completed, a total of 53 diesel generators will be operational within 200feet of several non-commercial uses, including residential developments, churches, and retail spaces. (See PMND, at 18.) With Bay Area Air Quality Management District (BAAQMD) standards allowing for testing of each generator for up to 35 hours each year, at full testing the

combined 200 and 400 Paul Avenue projects contemplate running a total of 1,855 hours per year- and these amounts are only for routine testing, and do not account for full backup diesel generator usage in the event of failure of the data centers' primary power source. The Planning Department should assess whether the combined 200 and 400 Paul Avenue projects could have a significant effect on the environment.

Issue #2-The PMND fails to assess environmental impacts from nearby Industrial uses or account for the fact that the Project site is located in an area that "already experiences poor air quality".

The PMND admits that that "the project site is located in an area that already experiences poor air quality" and that "operation of the proposed project would expose sensitive receptors to substantial air pollutant concentrations, resulting in a significant impact." (See PMND, at 67.) Yet, it concludes that implementation of mitigation measures would reduce impacts to "less than significant." For example, on October 18, 2012, the Planning Commission approved building of 121 units of low-income senior housing and a senior center located at 1751 Carroll Avenue. (See <http://commissions.sfplanning.org/cpcpackets/2012.0045CE.pdf>). The addition of a significant number of elderly, sensitive receptors immediately adjacent to the Project site is not given sufficient consideration in the PMND. The PMND also fails to address the specific air quality impacts of surrounding uses, such as the frequent passing of Caltrain's diesel-run engines and diesel and particulate exhaust from the nearby Highway 1 overpass. These pollution sources are not discussed and no measurement of impacts from these existing activities is provided. Similarly, there is also no discussion of effects from the heavy construction and corresponding diesel emissions resulting from buildout of the nearby Candlestick/Hunters Point Shipyard redevelopment project in the coming years. (See [http://www.sfplanning.org/ftp/files/MEA/2007.0946E\\_Candlestick\\_CR\\_1a.pdf](http://www.sfplanning.org/ftp/files/MEA/2007.0946E_Candlestick_CR_1a.pdf)). The Planning Department should assess the specific adverse impacts from surrounding uses." **O-Third**

#### **Response 4:**

The analysis of whether the project would have potential cumulative air quality impacts resulting from implementation of the project in combination with past, present, and reasonably foreseeable future development in the project area is provided on p. 69 of the PMND. The evaluation looked at whether there would be cumulative impacts to air quality, and if so, whether the project would result in a considerable contribution to that impact. The project is located in an area already adversely affected by poor air quality and the project would add new sources of TACs and DPM. However, with implementation of **Mitigation Measure M-AQ-2: Construction Emissions Minimization**, construction-related emissions would be reduced by up to 94 percent. Implementation of **Mitigation Measure-AQ-4: Retrofit of Existing Diesel Backup Generators** would result in a net decrease of particulate matter emissions from the existing site. Therefore, implementation of these two mitigation measures would ensure that the proposed project would not result in a considerable contribution to any cumulative air quality impacts. Furthermore, any future diesel generators proposed as part of the planned data center project at 400 Paul Avenue, would be required to undergo an air quality impact analysis similar to that prepared for the proposed project. That analysis would be available for review and comment as part of the environmental review process for that project.

**Comment 5:** Tier 4 emission standards should be required for construction equipment to reduce emissions.

"Issue #5- The PMND's proposed mitigation measures are inadequate and represent a "least cost alternative" approach on the part of the project sponsor.

*The PMND identifies a few mitigation measures that the project sponsor will undertake to purportedly reduce the significant impacts to a "less-than significant level." (See PMND, at 117.) Of particular relevance are Mitigation Measures M-AQ-2 and M-AQ-4, which involve construction emissions minimization and retrofit of four existing diesel backup generators, respectively. (Id. at 120-122.) These proposed mitigation measures are not sufficient to achieve significant reductions in environmental impacts, and should be reassessed and strengthened in connection with any Project approvals. First, the construction emissions measure is insufficient to ensure minimization of diesel emissions during construction. Under the proposal, the project sponsor can evade use of diesel engines with Tier 2 off-road emissions standards, retrofitted with ARB Level 3 VDECS, simply by "submit[ing] information providing evidence ... that an alternative source of power is limited or infeasible." (Id. at 121.) This exception is overly broad and threatens to swallow the entire mitigation measure. In reality, much more can (and should) be required of the project sponsor in minimizing construction emissions. In 2004, the EPA has implemented final Tier 4 emissions standards that are cleaner and more stringent than the preceding Tier 1-3 standard. Phase-in of the Tier 4 standards began in 2008, and will be completed by 2015, while the Project would be in progress. The PMND recognizes that "by implementing the federal Tier 4 standards, NOx and PM emissions will be reduced by more than 90 percent." (Id. at 63.) Yet, at the same time, the PMND indicates that "equipment with Tier 4 Final engines, ... is not yet readily available for all engine sizes subject to M-AQ-2LJ" (Id. at 63), and refuses to require any effort on behalf of the project sponsor to acquire or use Tier 4 level construction equipment. In reality, Tier 4 standards are regularly followed at construction sites, and Tier 4 compliant equipment has become widely available except for the most large-scale equipment used in major construction projects. The project sponsor should be required to use the highest emissions-rated equipment practicable, and not simply be held to a lower standard of using equipment that is "readily available." (See PMND, at 63.)" **O-Third***

#### **Response 5:**

Construction emissions are discussed on p. 63 of the PMND. The proposed project is in an area that already experiences poor air quality and the proposed project would require approximately six months of construction activities. Project construction activities would result in short-term emissions of DPM and other TACs, affecting nearby sensitive receptors and resulting in a significant impact. Implementation of Mitigation Measure M-AQ-2: Construction Emissions Minimization would reduce the magnitude of this impact to a less-than-significant level. While emission reductions from limiting idling, educating workers and the public and properly maintaining equipment are difficult to quantify, other measures, specifically the requirement for equipment with Tier 2 engines and Level 3 Verified Diesel Emission Control Strategy (VDECS) can reduce construction emissions by 89 to 94 percent compared to equipment with engines meeting no emission standards and without a VDECS. Emissions reductions from the combination of Tier 2 equipment with Level 3 VDECS is almost equivalent to requiring only equipment with Tier 4 Final engines, which is not yet readily available for all engine sizes subject to Mitigation Measure M-AQ-2: Construction Emissions Minimization. The commenters claim that demonstrating alternative sources of power are infeasible evades the requirements of Mitigation Measure M-AQ-2: Construction Emissions Minimization is incorrect. As written Mitigation Measure M-AQ-2: Construction Emissions Minimization requires that portable diesel engines be prohibited if alternative sources of power (electricity, natural gas, etc.) are available. If alternative sources are unavailable, Mitigation Measure M-AQ-2: Construction Emissions Minimization requires portable diesel engines to meet Tier 2 emissions standards and be equipped with a Level 3 VDECS, which is almost equivalent to requiring Tier 4 engines.

Comment 6: The diesel generator testing should be limited to Monday through Friday, 8:00 am to 5:00 pm.

"Add following: testing schedule of existing and proposed diesel generators shall be limited to Monday through Friday, holidays excepted and hours of 8 AM through 5PM." I-Nakamura

**Response 6:**

The diesel generator testing is planned to occur Monday through Friday, from 8:00 am to 5:00 pm. This period of operation was provided by the project sponsor and used in the preparation of the noise analysis to gauge compliance with the San Francisco Noise Ordinance. The text on p. 16 in the Project Description has been revised to reflect these testing hours.

Comment 7: The ongoing operation of the facility should be maintained in a manner satisfactory for achieving the required air quality and noise levels specified in the analyses.

"Add following: Operation and Maintenance of Proposed project shall be such that maintains the noise and air qualities to the levels to maximum or below described herein the proposed approval. The proposed project shall be maintained in manners to assure the conditions of approval.

Add following: Mitigation measures Assurance Observation by local residents. Local residents shall have access to review and observe the proposed project without hindrance within 30 days of written notice provided through any of common communication methods. Local residents may observe, collect data, record, or document the proposed project during normal operation to assure that the project operates within the permitted in this negative declaration." I-Nakamura

**Response 7:**

The project mitigation measures are listed in Section F. Mitigation and Improvement Measures on p. 122 of the PMND. These mitigation measures would ensure the project meets the specific standards for the operation of the new diesel generators and the retrofit of four existing generators with new Level 3 VDECS particulate filters outlined in the PMND, as well as attenuate noise to acceptable levels. The mitigation monitoring and reporting program (MMRP) for the project ensures ongoing compliance with these mitigation measures. Therefore, the project would be required to maintain its compliance at the levels identified in the PMND. If surrounding residents believe this is not being done, any resident may contact the San Francisco Planning Department's Code Enforcement Division at (415) 575-6863 with a complaint. All complaints will be followed up by the appropriate personnel. Additionally, any noise complaint may be reported to DPH Noise Enforcement at (415) 252-3800.

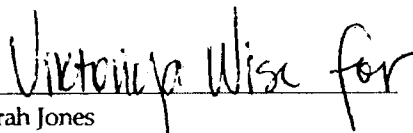


## I. H. DETERMINATION

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 July 23<sup>rd</sup>, 2013 .

  
Sarah Jones  
Acting Environmental Review Officer  
for  
John Rahaim  
Director of Planning

[Page 124 of the PMND Initial Study]

## J. INITIAL STUDY PREPARERS

### Authors:

Planning Department, City and County of San Francisco  
Environmental Planning Division  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

~~Acting~~ Environmental Review Officer: Sarah Jones

Senior Environmental Planner: Lisa Gibson

Environmental Planner: Heidi Kline

Senior Environmental Planner (Air Quality and Greenhouse Gases): Jessica Range

Environmental Planner (Air Quality and Greenhouse Gases): Wade Wietgrafe

Preservation Planner: Tara Sullivan

Archeologist: Randall Dean

### Consultants:

CSDA Design Group (Noise): Randy Waldeck, PE

Bluescape Environmental (Air Quality and Greenhouse Gases): Tracy Haynes and James Westbrook

### Project Sponsor:

Gregg Miller, Pillsbury Winthrop Shaw Pittman LLP, for 200 Paul LLC

## **Appendix A – Comment Letters Received on PMND**

Commenter: O-Brite

brite

BAYVIEW RESIDENTS IMPROVING THEIR ENVIRONMENT  
WWW.BRITESF.ORG  
WWW.FACEBOOK.COM/GROUPS/BRITESF

August 13, 2013

Heidi Kline, LEED AP  
Environmental Planner  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

RE: Preliminary Mitigated Negative Declaration for 200 Paul Avenue Project, Case No.  
2012.0153E

Ms. Kline,

We're writing to express our concerns about the project at 200 Paul in the Bayview district of San Francisco. Like our neighbors at 5800 Third Street, we have some questions about the environmental impact of the extra generators. We're also wondering how this project relates to the city's expressed desires to increase residential development and quality of life in the Bayview District and the Third Street Corridor.

We cannot support this project unless the city is willing to address the serious health and environmental concerns that the work may create. The quality of life in Bayview must not be negatively impacted and more must be done to ensure rigorous environmental review of the project and implementation of the strictest mitigation measures available.

Sincerely,

The BRITE Board  
Bayview Residents Improving Their Environment  
1650 Quesada  
San Francisco, CA 94124

RECEIVED

AUG 16 2013

CITY & COUNTY OF S.F.  
PLANNING DEPARTMENT  
M.E.A.

**Commenter: O-Third**

Kenneth A. Catterlin  
Chief Financial Officer  
5800 Third Street Owners Association  
5800 3rd Street #1414  
San Francisco, CA 94124  
415-822-2932  
kenncatterlin@hotmail.com

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August 13, 2013

Heidi Kline, LEED AP  
Environmental Planner  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

**RE: Preliminary Mitigated Negative Declaration for 200 Paul Avenue Project, Case No. 2012.0153E**

Dear Ms. Kline,

On behalf of the 5800 Third Street Owners Association and residents living at 5800/5900 Third Street, I write to communicate the concerns of those who are troubled by the Planning Department's finding of no significant effect on the environment, and to offer comments and suggestions on improving on the corresponding Preliminary Mitigated Negative Declaration ("PMND").

The proposed project at 200 Paul Avenue ("the Project") calls for expansion of an existing Internet services exchange, commonly known as a data center, and installation of 18 new diesel backup generators for use by existing and future tenants of the data center. The Project will substantially increase levels of diesel exhaust emissions in a residential area where individuals are already exposed to significant levels of environmental pollutants. For decades, the Bayview district has been forced to bear the brunt of environmental impact for the City's infrastructure and power generation needs. This project represents a disappointing reversal of the recent progress (albeit minimal) in improving air quality standards in the Bayview.

For the reasons set forth below, the Planning Department should reevaluate the PMND and conduct additional environmental review of the Project consistent with the City's General Plan directive "to reduce the level of pollutants in the air, to protect and improve public health, welfare and quality of life of the citizens of San Francisco and the residents of the metropolitan region." (See Air Quality Element, available at [http://www.sf-planning.org/ftp/general\\_plan/110\\_Air\\_Quality.htm](http://www.sf-planning.org/ftp/general_plan/110_Air_Quality.htm)) The Department's analysis should include consideration of further mitigation measures or other community benefits from the project sponsor, given that approval of the Project would confer substantial economic benefit on the project sponsor, at the expense of the health and well-being of community members.

Further review for substantial adverse impact on the environment should address the following issues:

Page 1 of 5

***Issue #1 – The PMND fails to evaluate the cumulative impacts of the adjacent proposed project at 400 Paul Avenue and other sources of air pollution in close proximity to the Project site***

The PMND contains an insufficient analysis of cumulative environmental impacts, treating the project as a standalone building expansion and installation of 18 diesel generators, rather than one in a series of projects and surrounding uses that together pose significant environmental and health risks to the community. This piecemealing of environment review is improper and fails to adequately evaluate combined adverse effects.

In particular, the PMND gives short shrift to the “foreseeable” project at 400 Paul Avenue, immediately adjacent to the Project site. (See PMND, at 22.) The 400 Paul Avenue project – currently in initial stages of environmental review – calls for a new data center comprising 183,560 square feet and an additional 18 diesel backup generators. While it is unclear if the 400 Paul Avenue project is proposed by the same project sponsor, that fact is immaterial to the anticipated combined effect of adding **36 total new diesel generators** in the next few years (18 generators at 200 Paul Avenue, and another 18 generators at 400 Paul Avenue) to the already existing 17 generators at 200 Paul Avenue. In total, therefore, by the time the 200 and 400 Paul Avenue projects are completed, **a total of 53 diesel generators will be operational within 200 feet of several non-commercial uses, including residential developments, churches, and retail spaces.** (See PMND, at 18.) With Bay Area Air Quality Management District (BAAQMD) standards allowing for testing of each generator for up to 35 hours each year, at full testing the combined 200 and 400 Paul Avenue projects contemplate running a total of **1,855 hours per year** – and these amounts are only for routine testing, and do not account for full backup diesel generator usage in the event of failure of the data centers’ primary power source.<sup>1</sup>

The Planning Department should assess whether the combined 200 and 400 Paul Avenue projects could have a significant effect on the environment.

***Issue #2 – The PMND fails to assess environmental impacts from nearby industrial uses or account for the fact that the Project site is located in an area that “already experiences poor air quality”***

The PMND admits that that “the project site is located in an area that **already experiences poor air quality**” and that “operation of the proposed project would expose sensitive receptors to substantial air pollutant concentrations, **resulting in a significant impact.**” (See PMND, at 67.) Yet, it concludes that implementation of mitigation measures would reduce impacts to “less than significant.” (*Id.*)

For example, on October 18, 2012, the Planning Commission approved building of 121 units of low-income senior housing and a senior center located at 1751 Carroll Avenue. (See <http://commissions.sfplanning.org/cpcpackets/2012.0045CE.pdf>) The addition of a significant number of elderly, sensitive receptors immediately adjacent to the Project site is not given sufficient consideration in the PMND.

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<sup>1</sup> The PMND indicates that the project sponsor’s records show that actual testing of the 17 existing generators amounts to less than 35 hours per year, but no specifics testing metrics are cited or attached to PMND. (See PMND, at 67.)

The PMND also fails to address the specific air quality impacts of surrounding uses, such as the frequent passing of Caltrain's diesel-run engines and diesel and particulate exhaust from the nearby Highway 101 overpass. These pollution sources are not discussed and no measurement of impacts from these existing activities is provided. Similarly, there is also no discussion of effects from the heavy construction and corresponding diesel emissions resulting from buildout of the nearby Candlestick/Hunters Point Shipyard redevelopment project in the coming years. (See [http://www.sf-planning.org/ftp/files/MEA/2007.0946E\\_Candlestick\\_CR\\_1a.pdf](http://www.sf-planning.org/ftp/files/MEA/2007.0946E_Candlestick_CR_1a.pdf))

The Planning Department should assess the specific adverse impacts from surrounding uses.

***Issue #3 – The PMND fails to account for nearby residential uses and the City's stated objectives to increase residential development and quality of life in the Bayview District and Third Street Corridor***

For decades, the Bayview district has lagged economically and environmentally from other regions in the City. Recent progress has been made in improving environmental conditions by, for example, shutting down of the Mirant Power Plant in Potrero Hill and approved renovation of the Southeast Wastewater Treatment Plant, which processes 80 percent of the City's wastewater flows. The Project constitutes a setback to this progress and directly contradicts the City's stated goals of improving quality of life (health, economic opportunity, and safety) in the Bayview. The PMND ignores these objectives and discounts the immediately surrounding residential uses that would suffer from the Project's approval.

The PMND gives little discussion to the impacts on existing residential uses on Paul Avenue and Third Street, which are all well within 500 feet of the project site. Developers have also received final approvals for a third phase of residential development at 5800 Third Street, encompassing 271 multi-family dwelling units in two buildings (one building is market rate housing, the second is 121 units of low-income senior housing (see above), along with a 15,000-square-foot senior center. These new units will be ***situated just 125 feet from the project site***. Many residents at these units – and those living at existing units at the Armstrong Townhomes and 5800 Third Street condominiums – are lower-income, self-employed, disabled and/or elderly, and will be exposed to diesel exhaust even during routine daytime testing of the project's diesel generators. The PMND does little more than mention these residential uses, while failing to assess the cumulative impacts of exposing residents to substantially increased amounts of diesel exhaust, which have been shown to be damaging to human health.

According to CEQA Guidelines, "the determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, . . . [and] the significance of an activity may vary with the setting. For example, an activity which may not be significant in an urban area may be significant in a rural area." §15064(b). Here, the Planning Department has not exercised "careful judgment," but rather has glossed over "the setting" in which the Project is proposed. The Project site is not located in an isolated industrial park or in a rural area far outside a population center. Rather, it is a stone's throw away from residences, a Church with a child day care school (True Hope), and retail establishments. These realities should be addressed.

***Item #4 – The PMND fails to address the adverse environmental and health impacts from increased emissions of diesel exhaust***

The PMND does not explain the significant human health impacts of exposure to diesel exhaust, nor explore alternative source of backup power generation, for example, through clean technology generators that do not rely on diesel. (See CommScope White Paper on Fuel Cell Technology, at [http://docs.commscope.com/Public/Fuel\\_Cell\\_WhitePaper\\_WP-104050-EN.pdf](http://docs.commscope.com/Public/Fuel_Cell_WhitePaper_WP-104050-EN.pdf))

Since 1998, the California Air Resources Board ("CARB") has identified the particulate matter in diesel exhaust as a Toxic Air Contaminant based on its potential to cause or contribute to cancer, heart and lung disease, poor pregnancy outcomes, premature death, and other health problems. In most areas of California, emissions of diesel exhaust account for over 80% of the air pollution caused cases of cancer and other health effects. CARB estimated the number of premature deaths associated with exposure to diesel particulate to be 3,500 per year statewide in 2008. (See BAAQMD April 2011 Staff Report, p. 8, at [http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/Public%20Hearings/2011/1117\\_sr\\_041811.ashx](http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/Public%20Hearings/2011/1117_sr_041811.ashx))

Despite progress made through national air quality standards, urban air pollution remains an important contributor to poor health in many urban areas, including San Francisco, and especially in the Southeast Corridor and the Bayview. Air pollutants result in adverse effects on lung development, asthma, and life-expectancy. Exposure is greater for communities like the Bayview that are situated near pollution sources, such as freeways, distribution centers, and heavy industry, and the elderly, the young, and those with higher rates of respiratory disease are most vulnerable to harm. Controlling urban air pollution and reducing disparities in exposure is necessary for the success of sustainability initiatives that aim to increase the population in existing urban areas and promote active transportation.

The PMND does not address these regional and statewide objectives of controlling and reducing air pollution, particularly diesel exhaust, and the Planning Department must do so through further review.

***Issue #5 -- The PMND's proposed mitigation measures are inadequate and represent a "least cost alternative" approach on the part of the project sponsor***

The PMND identifies a few mitigation measures that the project sponsor will undertake to purportedly reduce the significant impacts to a "less-than significant level." (See PMND, at 117.) Of particular relevance are Mitigation Measures M-AQ-2 and M-AQ-4, which involve construction emissions minimization and retrofit of four existing diesel backup generators, respectively. (*Id.* at 120-122.) These proposed mitigation measures are not sufficient to achieve significant reductions in environmental impacts, and should be reassessed and strengthened in connection with any Project approvals.

First, the construction emissions measure is insufficient to ensure minimization of diesel emissions during construction. Under the proposal, the project sponsor can evade use of diesel engines with Tier 2 off-road emissions standards, retrofitted with ARB Level 3 VDECS, simply by "submit[ing] information providing evidence . . . that an alternative source of power is limited or infeasible." (*Id.* at 121.) This exception is overly broad and threatens to swallow the entire mitigation measure. In reality, much more can (and should) be required of the project sponsor in minimizing construction emissions.

In 2004, the EPA has implemented final Tier 4 emissions standards that are cleaner and more stringent than the preceding Tier 1-3 standard. Phase-in of the Tier 4 standards began in 2008, and will be



completed by 2015, while the Project would be in progress. The PMND recognizes that “by implementing the federal Tier 4 standards, NOx and PM emissions will be reduced by more than 90 percent.” (*Id.* at 63.) Yet, at the same time, the PMND indicates that “equipment with Tier 4 Final engines, . . . is not yet readily available for all engine sizes subject to M-AQ-2[,]” (*id.* at 63), and refuses to require any effort on behalf of the project sponsor to acquire or use Tier 4 level construction equipment. In reality, Tier 4 standards are regularly followed at construction sites, and Tier 4 compliant equipment has become widely available except for the most large-scale equipment used in major construction projects. The project sponsor should be required to use the highest emissions-rated equipment practicable, and not simply be held to a lower standard of using equipment that is “readily available.” (*See* PMND, at 63.)

Second, the existing generator retrofit measure is far too lenient to have a substantial mitigating impact on the proposed additional 18 diesel generators (36 generators counting the 400 Paul Avenue project). The mitigation measure calls for retrofit of **only four existing diesel backup generators**, numbers S-18, S-19, S-20, and S-21. (*Id.* at 122.) This proposed mitigation is arbitrary and insufficient in light of the fact that the remaining 13 existing generators will be permitted to operate without retrofit or limits on usage. The existing generators have been in operation for several years, and emit diesel exhaust at a far higher rate than newer model generators. The PMND fails to address mitigation the impacts of allowing the older, dirtier generators to continue operation and the combined impact of adding dozens more generators to the emissions mix.

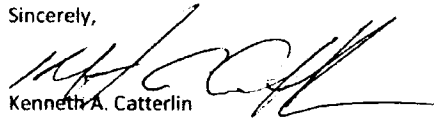
By ordinance, it is the policy of the City and County of San Francisco to reduce particulate and greenhouse gas pollution. (*See* [http://www.sf-planning.org/ftp/files/MEA/GHG-Reduction\\_ApxB.pdf](http://www.sf-planning.org/ftp/files/MEA/GHG-Reduction_ApxB.pdf)) The Project, as proposed, does not follow these guidelines and would unquestionably increase particulate exhaust and greenhouse gas emissions.

Similarly, the San Francisco Community Health Improvement Plan was adopted to help address disparate health outcomes in certain communities, including Bayview/Hunters Point. As stated in a Department of Public Health presentation in October 2012, among the priorities are to “ensure safe and healthy living environment” and to “increase physical activity.” There is no discussion of the conflicts this Project represents to these adopted City plans. (*See* PMND, at 19.)

#### **Conclusion**

The Project presents serious health and environment concerns to community members, and the PMND does not address many of these concerns in any length. While community members are willing to work with the City and the project sponsor in achieving a constructive resolution, more must be done to ensure rigorous environmental review of the Project and implementation of the strictest mitigation measures available. We look forward to working with the City on meeting these objectives.

Sincerely,



Kenneth A. Catterlin  
Chief Financial Officer  
5800 Third Street Owners Association

## Commenter: I-Castleberry

Kline, Heidi

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**From:** Jason Castleberry <jcastleberry05@gmail.com>  
**Sent:** Tuesday, August 13, 2013 4:56 PM  
**To:** David Froehlich  
**Cc:** Kline, Heidi; Cohen, Malia; Bruss, Andrea; Teague, Corey  
**Subject:** Re: 200 Paul Ave PMND Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I want to echo these points and add that there is opportunity to do more than the minimum when adding and updating these facilities. The exposures our community members already deal with is enough, it shouldn't have to be a hardship placed on residents to mitigate new and worsening exposures. The bottom line is that net zero isn't good enough and shouldn't be good enough knowing what challenges the southeast district's residents already face.

Although the formal letter to respond to digital realty is being handled by three of our areas neighborhood groups (BRITE, Bayview Heights Triangle Neighborhood Association and 5800 HOA) I want to make it clear that the members of our group, which are a large number of homes all along Exeter street (directly across from 200 Paul) and those of Wheat, Paul and Crane feel strongly about this as well.

Also echoing David, we aren't opposed to renovations and construction of new business but these businesses should be good neighbors. Part of that is doing better than bare minimum and recognizing they are members of a community that all of us call home.

Thank you,  
Jason

On Tue, Aug 13, 2013 at 11:18 AM, David Froehlich <dfro78@gmail.com> wrote:  
Hi Heidi,

Thank you again for meeting with the community members to go over the PMND for the 200 Paul Ave project. I know today is the deadline for comments so I am writing to express a few quick concerns as I have not had the time to write a formal letter. Once again, I live on Exeter Street to the south of the 200 Paul Ave project site and share the same views as many of my neighbors of all ages and ethnicities that may not have the energy or courage to speak up about issues like this. My neighbor across the street is 92 years old and moved into his house on Exeter Street when he was 8 years old, 84 years ago and long before the Macy's warehouse which is now the current site of Digital Reality Trust.

My main concern is that the review did not take into account the 17 existing diesel generators that have been there since the 90's when the Data center was originally developed. The document recommends to retrofit only 4 of the 17 existing diesel generators while still adding 18 new generators. The project sponsors should retrofit all of the existing diesel generators before any new generators are added to this site that is already located in an area that experiences poor air quality. The document also does not take in to account that that there is a proposed development next door that will add an additional 18 diesel generators or any of the new development that is planned for the Hunters Point/Candlestick redevelopment.

This development will present serious health and environmental issues which are not addressed in the PMND document. We are not opposed to new development of these sites and are willing to work with the developers. More must be done to ensure that these developments are not just doing the minimal requirements to have a net zero impact but are doing more to improve the environment and air quality; not just for the neighbors of 200 Paul Ave, but for the Bayview, for the city of San Francisco and for the whole Bay Area.

## Commenter: I-Froelich

Kline, Heidi

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**From:** David Froehlich <dfro78@gmail.com>  
**Sent:** Tuesday, August 13, 2013 11:18 AM  
**To:** Kline, Heidi  
**Cc:** Jason Castleberry; Cohen, Malia; Bruss, Andrea; Teague, Corey  
**Subject:** 200 Paul Ave PMND Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Sincerely,  
David Froehlich  
Exeter Street  
Paul Crane Exeter Neighborhood Watch Group

## Commenter: I-Nakamura

Kline, Heidi

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**From:** tom nakamura <qrunsws@sbcglobal.net>  
**Sent:** Monday, August 12, 2013 6:50 AM  
**To:** Kline, Heidi  
**Subject:** 200 Paul Ave Project review comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Ms Heidi Kline, Planner [Heidi.Kline@sfgov.org](mailto:Heidi.Kline@sfgov.org)  
San Francisco Planning Department

Re: case no. 2012.0153E

We are local residents living at 24 Exeter street.  
Here are our thoughts on reviewing the Proposed project Mitigated Negative Declaration dated July 24, 2013

page 49 Impact No.1

Add following: testing schedule of existing and proposed diesel generators shall be limited to Monday through Friday, holidays excepted and hours of 8AM through 5PM.

page 50 Impact No.1

Add following: Operation and Maintenance of Proposed project shall be such that maintains the noise and air qualities to the levels to maximum or below described herein the proposed approval. The proposed project shall be maintained in manners to assure the conditions of approval.

Add following:

Mitigation measures Assurance Observation by local residents. Local residents shall have access to review and observe the proposed project without hinderance within 30 days of written notice provided through any of common communication methods. Local residents may observe, collect data, record or document the proposed project during normal operation to assure that the project operates within the permitted in this negative declaration.

As the project whole concerned, the existing generators should be brought into current new generator exhaust standards through retrofitting with exhaust filters or other available methods. 4 of the generators are modified in such manner per the mitigation measures described in the negative declaration. The owner and operator shall further extend the measure to existing to contribute the well being of the neighborhood and the community environment, already heavily burdened (above the levels enjoyed by the greater parts of San Francisco) with pollution sources including but not limited to the proposed project.

tomassa and jane