SAN FRANCISCO
PLANNING DEPARTMENT

PRELIMINARY MITIGATED NEGATIVE DECLARATION

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Date:	July 24, 2013
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

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. 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.

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.

Table of Contents

List of Tables

List of Figures

List of Acronyms

$\mu g/m^3$	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_4	Methane
CMP	Congestion Management Plan
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2E	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_{90}	Noise level exceeded 90 percent of the time
L_{dn}	Day-night Average Sound Level
LEED	Leadership in Energy and Environmental Design
LOS	Level of Service
MBTA	Migratory Bird Treaty Act
$MTCO_2E$	Metric Tons of Carbon Dioxide Equivalent
MPO	Metropolitan Planning Organizations
MRZ	Mineral Zone
$MTCO_2/MWh$	Metric Tons of Carbon Dioxide per Megawatt Hour
MW	Megawatt
MWh	Megawatt hour
N_2O	Nitrous Oxide
NAHC	National American Heritage Commission
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NFIP	National Flood Insurance Program
NO_2	Nitrogen Dioxide
NO_x	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	Polychlorinatede Biphenyl
PDR	Production, Distribution, and Repair
PM	Particulate Matter
PM_{10}	Particulate Matter with Diameter 10 microns or less
$PM_{2.5}$	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_2	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,[1] 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.[2] 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.

A. 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.

---

[1] 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.

[2] 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

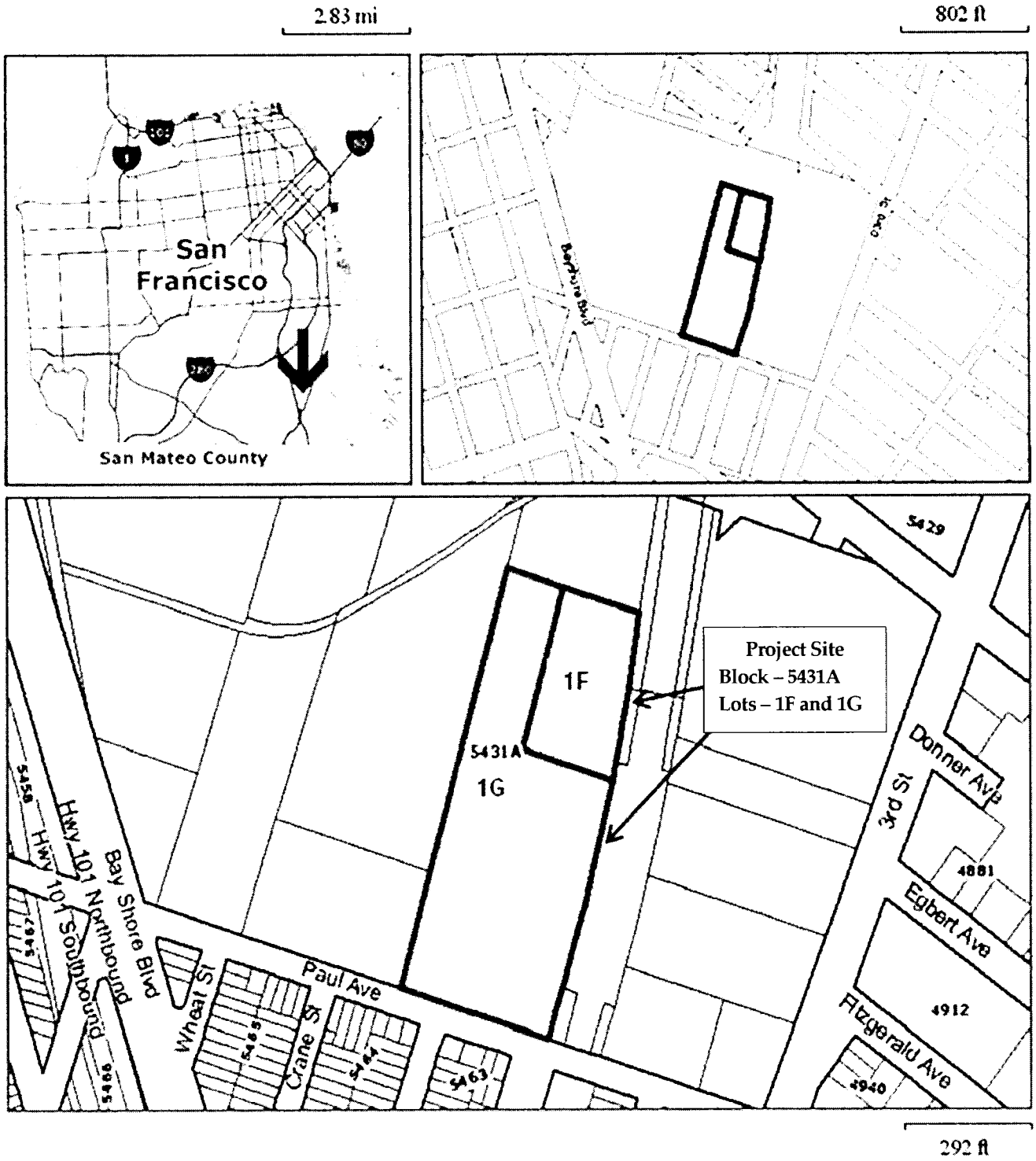
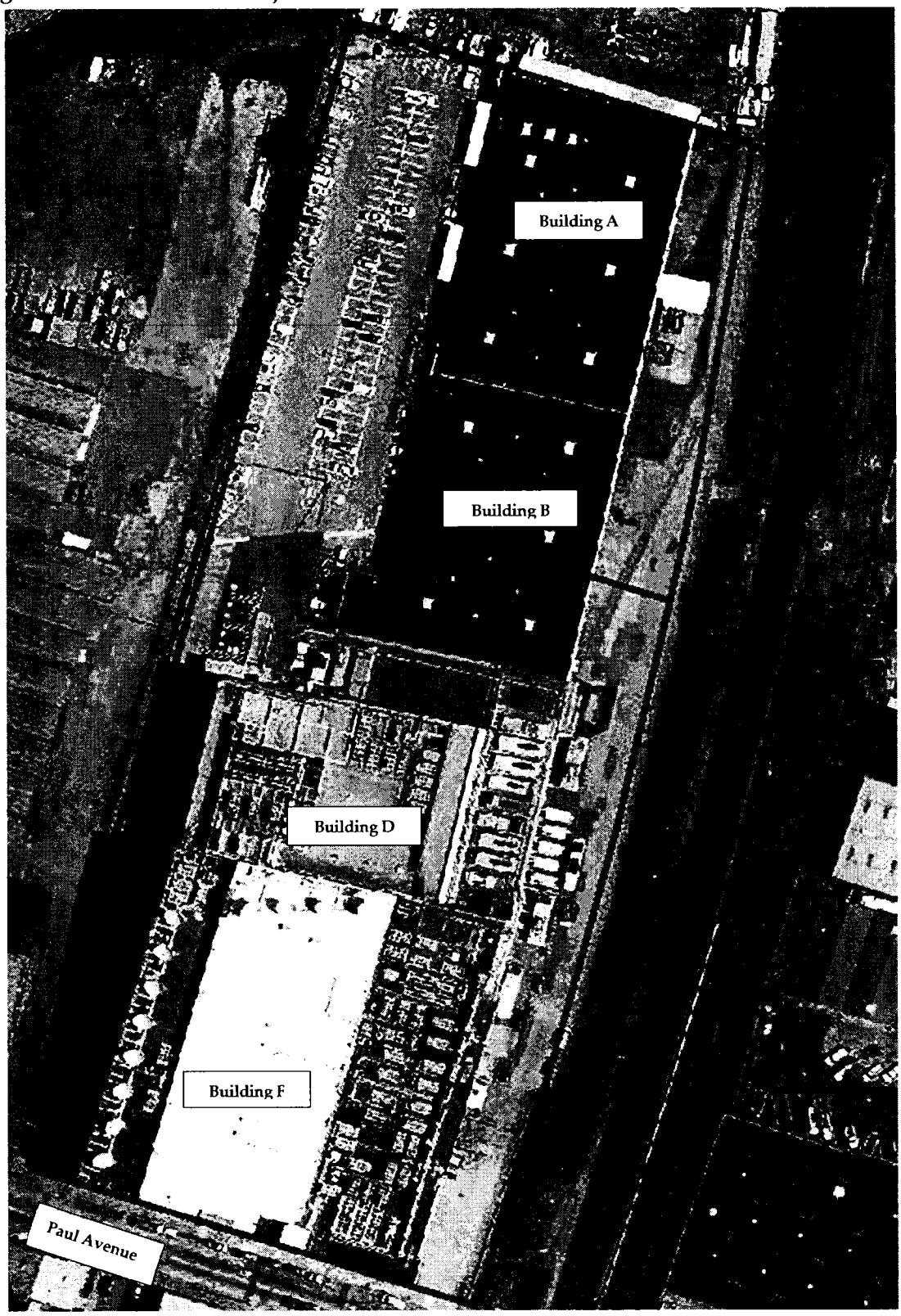


Figure 2 - Aerial Photo of Project Site



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.[3] The program-level Bayview Hunters Point Redevelopment Projects and Rezoning Final Environmental Impact Report (BVHP FEIR)[4] 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[5] and telco[6] 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[7] 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

---

[3] Bayview Hunters Point Area Plan. Accessed on June 25, 2013. http://www.sf-planning.org/ftp/general_plan/Bayview_Hunters_Point.htm.

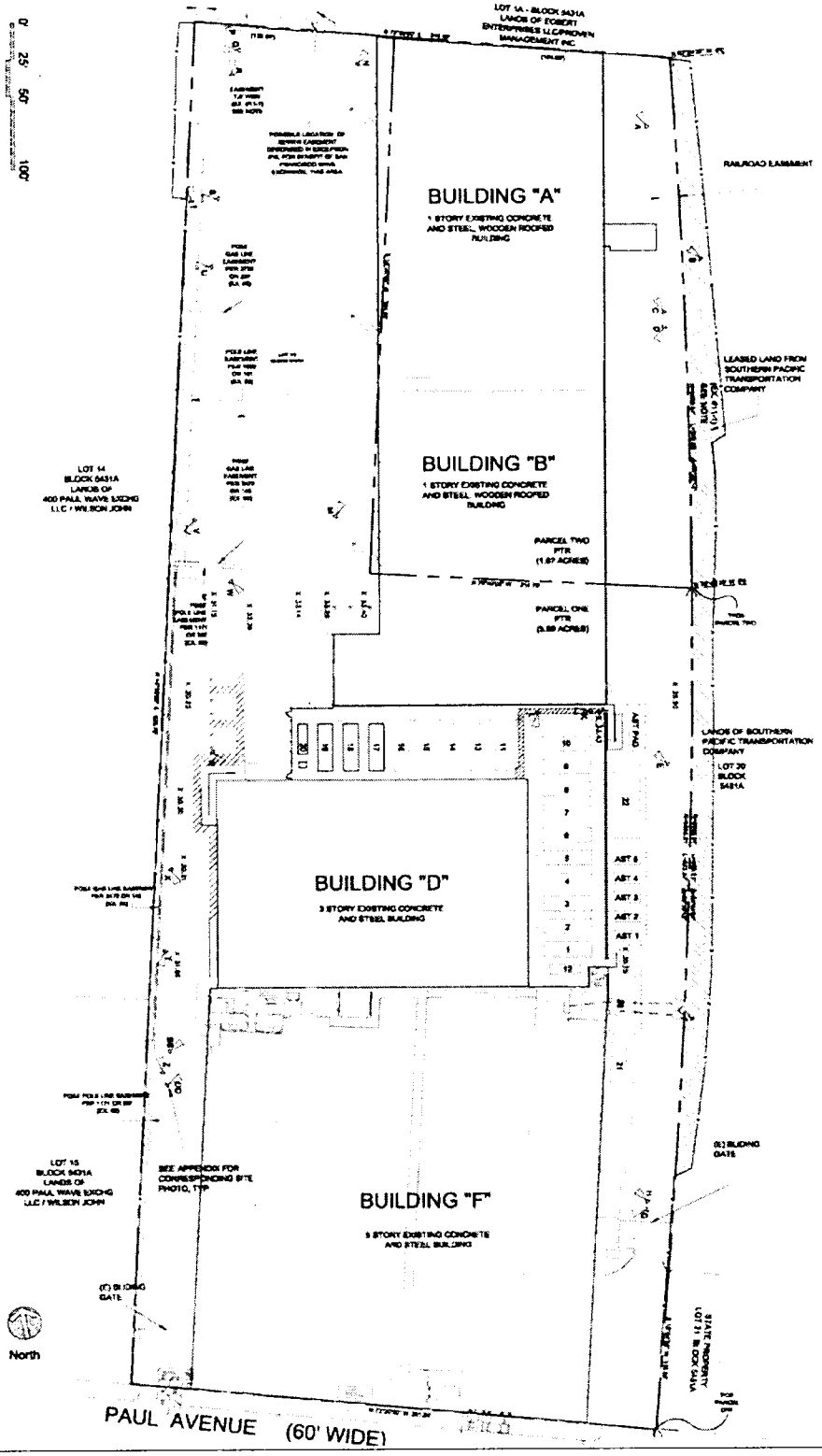
[4] *Bayview Hunters Point Redevelopment Projects and Rezoning Final EIR* (Case 1996.546E; State Clearinghouse No. 2003062094), certified by the San Francisco Planning Commission on March 2, 2006. This document is available for review at 1650 Mission Street, Suite 400, San Francisco, CA.

[5] 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.

[6] 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.

[7] 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[8] (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.[9]

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

[8] 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.

[9] 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,[10] 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)[11] space into turn-key flex (TKF)[12] 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

---

[10] The actual commencement date is dependent on the project sponsor obtaining its first site permit for the project.

[11] 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.

[12] 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

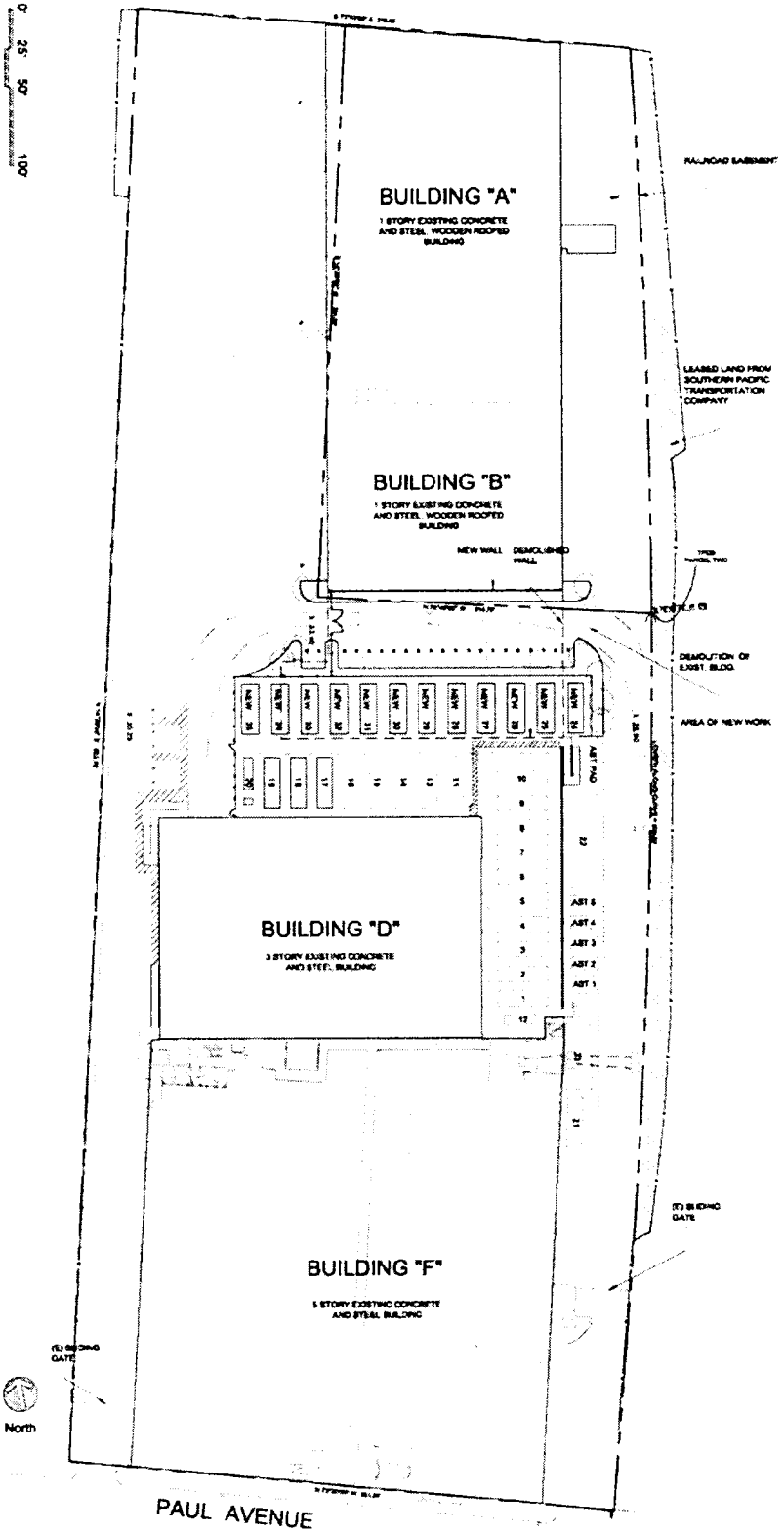


Figure 5 - Site Plan Showing Portion of Building B To Be Removed