



SAN FRANCISCO PLANNING DEPARTMENT

Mitigated Negative Declaration

PMND Date: May 27, 2015; **amended on July 16, 2015** (deletions to the PMND are shown in ~~strike through~~ and additions are shown in **double underline**)

Case No.: **2013.0850E**

Project Title: **501 Tunnel Avenue ("West Wing") Project**

Zoning: M-1 (Light Industrial) and M-2 (Heavy Industrial) Districts
40-X Height and Bulk District

Block/Lot: 4991/008

Lot Size: 93,998 square feet

Project Sponsor: Recology

Project Contact: John Glaub, (415) 715-6203

Lead Agency: San Francisco Planning Department

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PROJECT DESCRIPTION:

The approximately 93,998-square-foot (sf) project site is located approximately 340 feet southeast of the Lathrop Avenue/Tocoloma Avenue intersection in the Visitacion Valley neighborhood in San Francisco. The site is within Recology San Francisco's Solid Waste Transfer and Recycling Center facility, which is the City's permitted facility for resource recovery, solid waste transfer and construction and demolition debris recycling. The project site is adjacent to the existing transfer station to the west and is currently undeveloped (it slopes steeply downward toward southwest).

The proposed project would construct a new building that would serve as an addition to the existing transfer station and would accommodate additional waste processing activities and equipment to support enhanced recovery of recyclable and compostable materials. The proposed building would provide approximately 14,000 square feet of space, including approximately 11,500 square feet on the main level and approximately 2,500 square feet on the lower level. The new structure would abut against the west side of the existing transfer station building and would be approximately 35 feet wide along the northern side and approximately 115 feet wide along the southern side. It would be approximately 40 feet in height, per the Planning Department's height definition, which is defined as the existing grade measured to the midpoint of a sloped roof. The proposed project would also include retaining walls and pavement improvements on the site. The largest retaining wall would be comprised of three segments, totaling approximately 90 feet in length and ranging from 2 feet to 7 feet in height. The two smaller retaining walls, at the northwest and southwest building corners, would be roughly 16 feet long by 3 feet high and 30 long by 4 feet high, respectively.

If discretionary review before the Planning Commission is requested, the discretionary review hearing is the Approval Action for the project. If no discretionary review is requested, the issuance of a building permit by the Department of Building Inspection (DBI) is the Approval Action. The Approval Action date

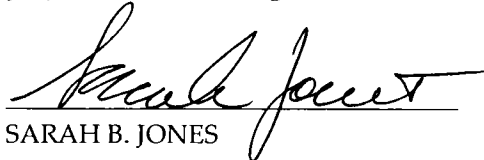
establishes the start of the 30-day appeal period for this CEQA exemption determination pursuant to Section 31.04(h) of the San Francisco Administrative Code.

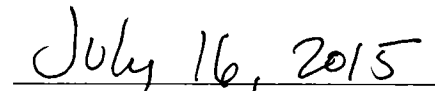
FINDING:

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

Mitigation measures are included in this project to avoid potentially significant effects. See pages 79 – 83.

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


Date of Issuance of Final Mitigated
Negative Declaration

cc: John Glaub, Brittany Bendix, M.D.F

INITIAL STUDY
501 TUNNEL AVENUE (“WEST WING”) PROJECT
PLANNING DEPARTMENT CASE NUMBER 2013.0850E

TABLE OF CONTENTS

A.	PROJECT DESCRIPTION	1
B.	PROJECT SETTING	9
C.	COMPATIBILITY WITH EXISTING ZONING AND PLANS	10
D.	SUMMARY OF ENVIRONMENTAL EFFECTS.....	13
E.	EVALUATION OF ENVIRONMENTAL EFFECTS.....	14
	1. Land Use and Land Use Planning	14
	2. Aesthetics	16
	3. Population and Housing.....	19
	4. Cultural and Paleontological Resources	21
	5. Transportation and Circulation	26
	6. Noise	30
	7. Air Quality	34
	8. Greenhouse Gas Emissions.....	50
	9. Wind and Shadow	52
	10. Recreation.....	54
	11. Utilities and Service Systems.....	55
	12. Public Services	59
	13. Biological Resources	60
	14. Geology and Soils	63
	15. Hydrology and Water Quality	67
	16. Hazards and Hazardous Materials.....	71
	17. Mineral and Energy Resources	75
	18. Agricultural and Forest Resources	76
	19. Mandatory Findings of Significance	78
F.	MITIGATION MEASURES AND IMPROVEMENT MEASURES.....	79
G.	PUBLIC NOTICE AND COMMENT	83
H.	DETERMINATION.....	84
I.	INITIAL STUDY PREPARERS.....	85

LIST OF FIGURES

Figure 1. Project Location Map	2
Figure 2. Existing Site Plan	3
Figure 3. Proposed Pit Level Plan.....	4
Figure 4. Proposed Main Level Plan	5
Figure 5. Proposed Elevations.....	6
Figure 6. Proposed Elevation/Section.....	7

LIST OF TABLES

Table 1. Criteria Air Pollutant Significance Thresholds	36
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A. PROJECT DESCRIPTION

Project Location and Site Characteristics

The approximately 94,000-square-foot (sf) project site (Assessor's Block 4991, Lot 008) is located approximately 340 feet southeast of the Lathrop Avenue/Tocoloma Avenue intersection in the Visitacion Valley neighborhood in San Francisco. The site is within Recology San Francisco's Solid Waste Transfer and Recycling Center (SFSWTRC) facility, which is the City's permitted facility for resource recovery, solid waste transfer, and construction and demolition debris recycling (hereinafter referred to as the "Recology facility" or "facility" throughout this document). The Recology facility spans approximately 44 acres and contains a number of structures, including the Solid Waste Transfer Station (Transfer Station), the Integrated Materials Recovery Facility (IMRF), a public disposal and recycling area, scales, a fueling station, vehicle storage and maintenance areas, an environmental learning center, and Recology offices. The Recology facility straddles the border between the City and County of San Francisco and the City of Brisbane (San Mateo County).

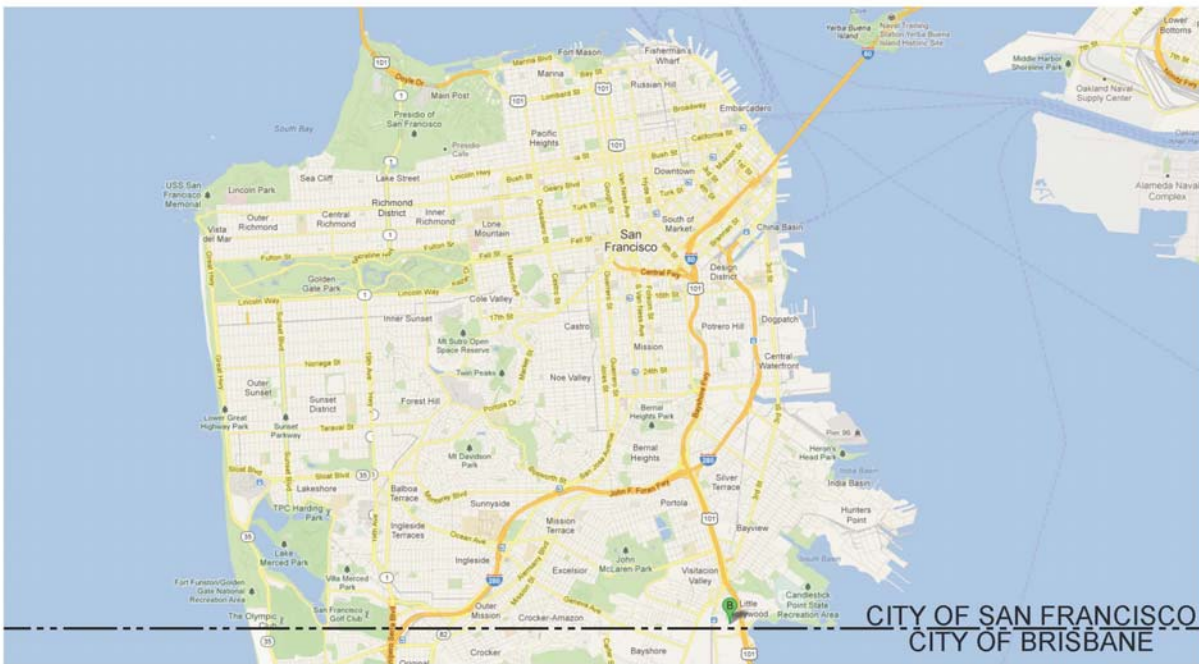
The immediate project site is adjacent to the existing Transfer Station to the west and is currently undeveloped. It contains a steeply sloped vegetated portion (sloping downward toward the southwest) and surrounding flat areas. The project site topography has a peak elevation of approximately 60 feet (San Francisco City Datum), sloping to 35 feet in the southwestern corner of where the new building is proposed.¹ The Transfer Station, which the proposed building would abut, is a two-story, 43-foot-tall, approximately 47,000-sf facility, which operates 24 hours a day, seven days a week, 365 days a year.

The project site is within two zoning districts: the northern portion of the site is within the Light Industrial (M-1) zoning district while the southern portion of the site is within the Heavy Industrial (M-2) zoning district. The project site is also located within a 40-X Height and Bulk District.

Proposed Project

The proposed project (also referenced as the "West Wing" project throughout this document) includes the construction of a new 14,000-sf building which would abut the existing Transfer Station on the west side and would be used for additional resource recovery and waste processing activities. The proposed project would serve as a testing facility for different combinations of equipment to extract useable resources from municipal solid waste (MSW), which otherwise is sent directly to landfill. The proposed addition would consist of a one-story

¹ San Francisco City Datum establishes the city's zero point for surveying purposes at approximately 8.6 feet above the mean sea level established by 1929 U.S. Geological Survey datum, and approximately 11.3 feet above the current 1988 North American Vertical Datum. Because tides are measured from mean lower low water, which is about 3.1 feet below mean sea level (MSL), an elevation of 0, SFD, is approximately 8.2 feet above MSL.



1 Location Map
N.T.S.



2 Vicinity Map
N.T.S.

FIGURE 1. PROJECT LOCATION MAP

Figure not to scale

Source: San Francisco Planning Department

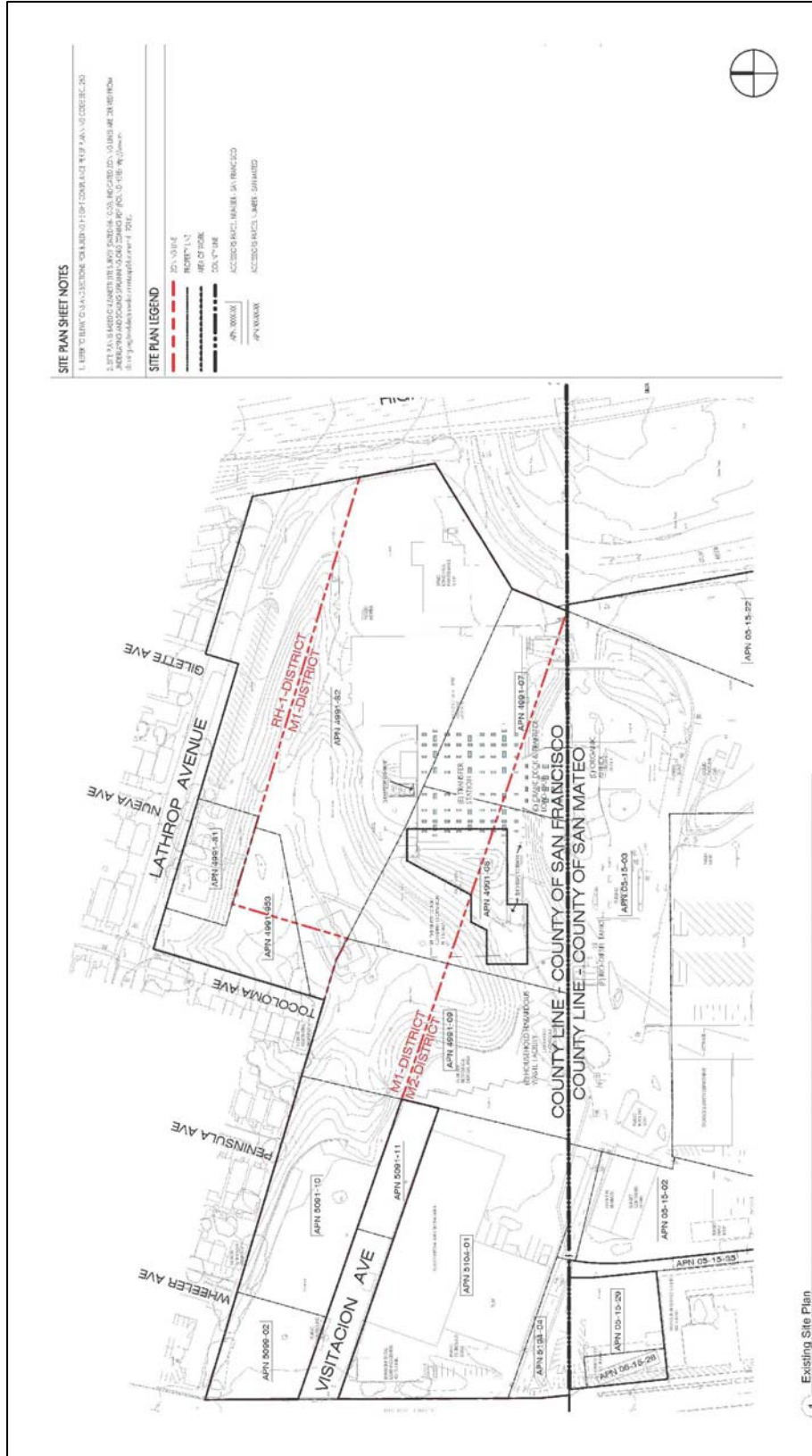


FIGURE 2 EXISTING SITE PLAN

Figure not to scale
Source: Leavitt Architecture

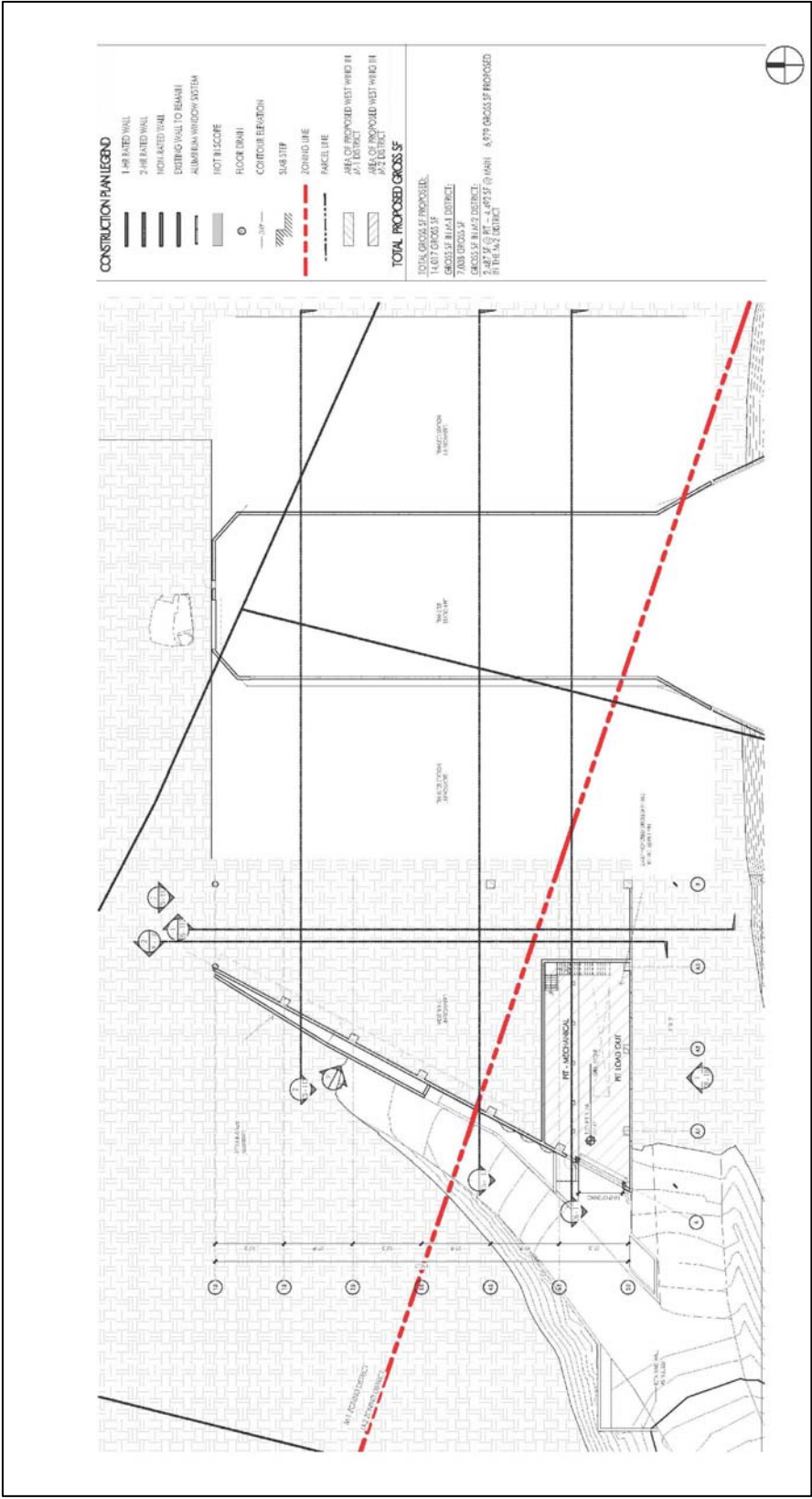


FIGURE 3 PROPOSED PIT LEVEL PLAN

Figure not to scale
Source: Leavitt Architecture

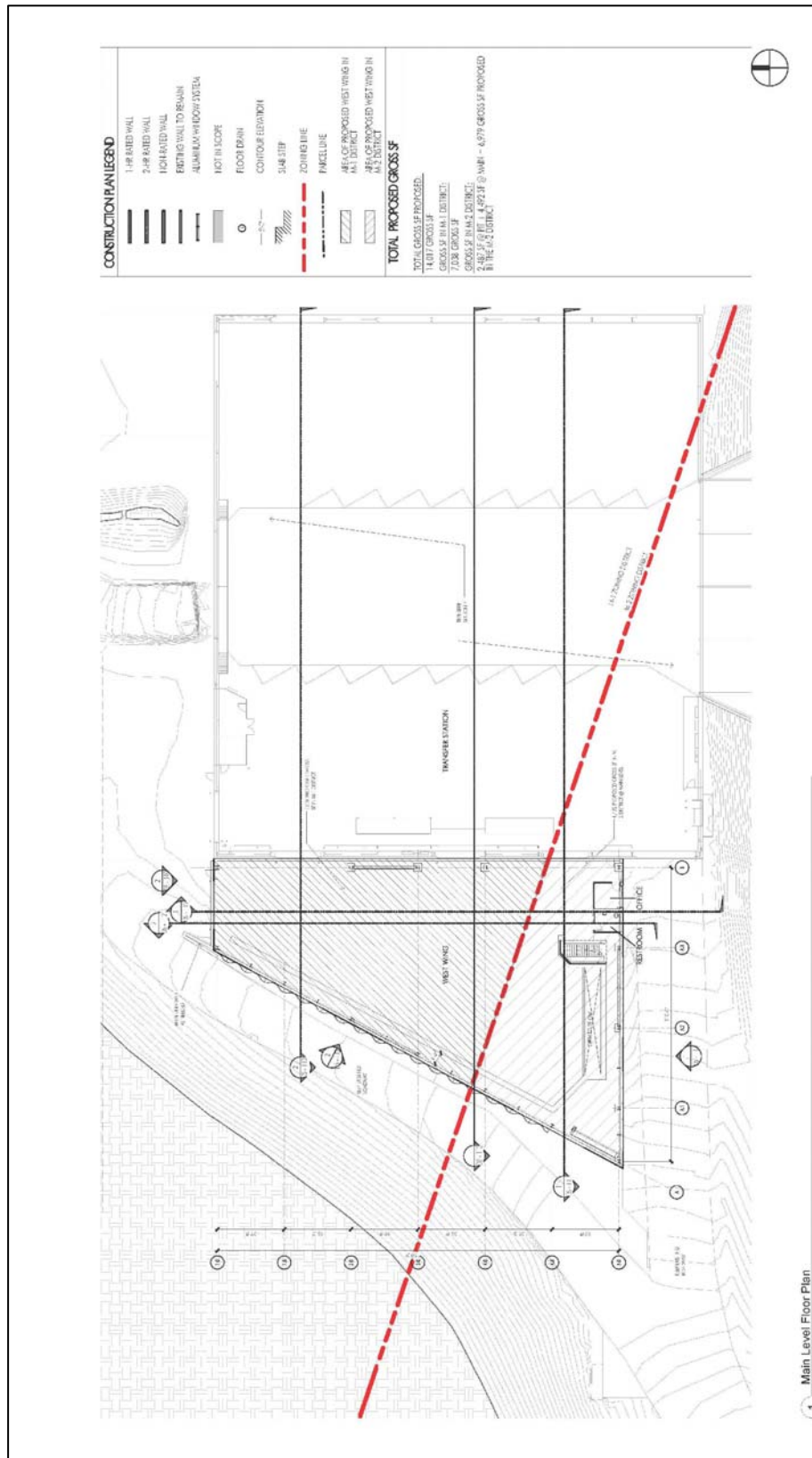


FIGURE 4 PROPOSED MAIN LEVEL PLAN

Figure not to scale

Source: Leavitt Architecture

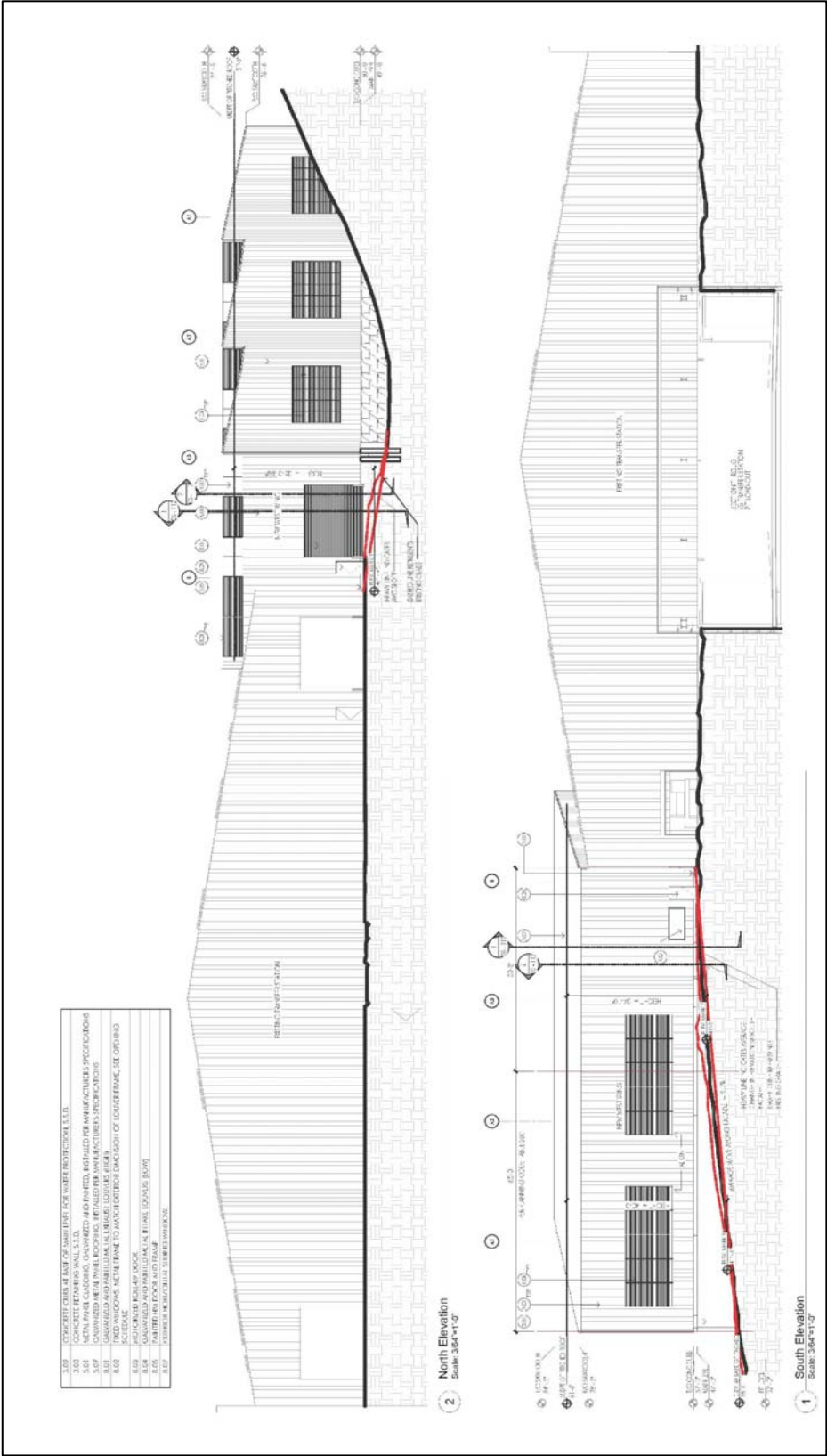


FIGURE 5 PROPOSED ELEVATIONS

Figure not to scale

Source: Leavitt Architecture

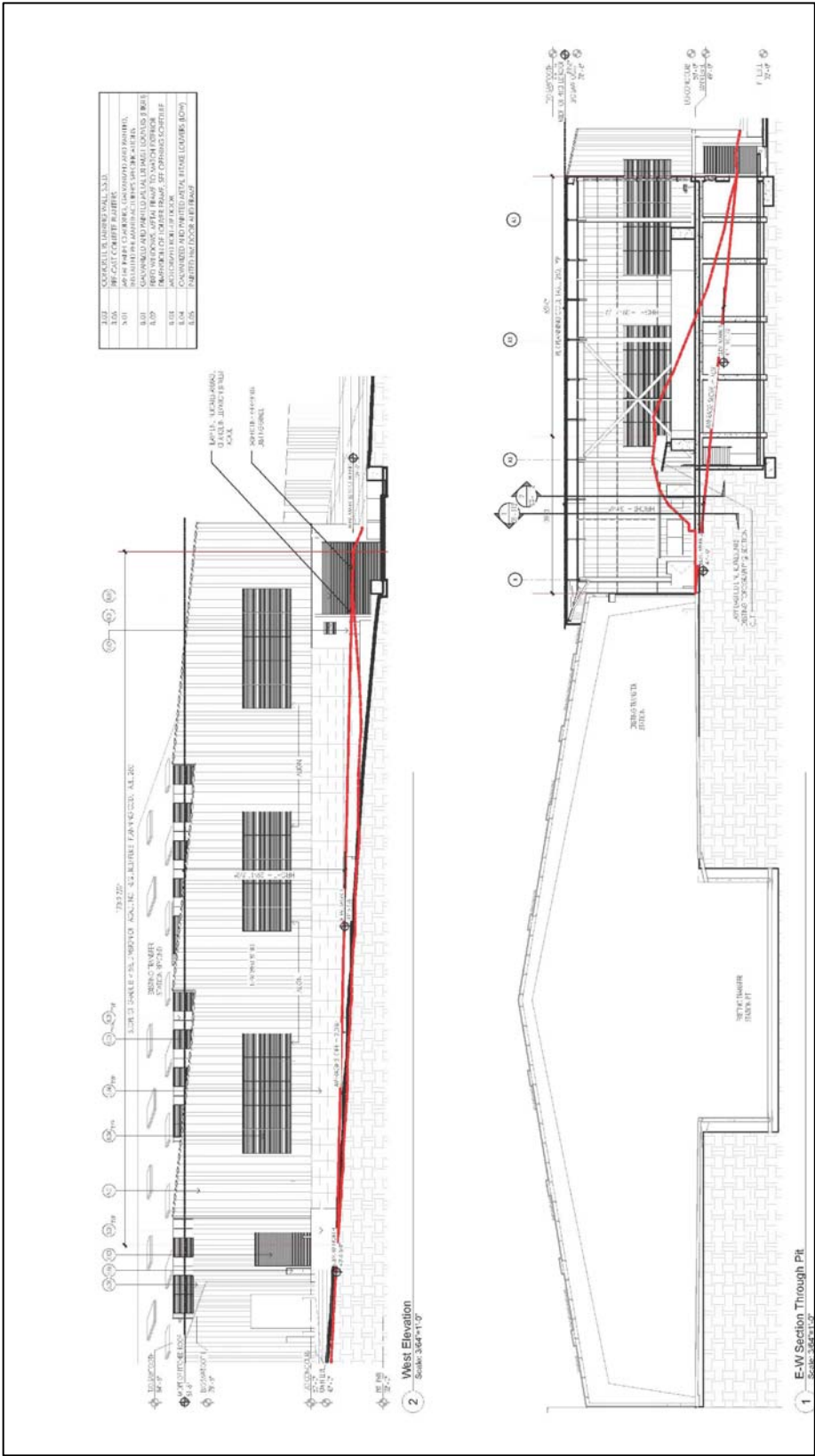


FIGURE 6 PROPOSED ELEVATION/SECTION

Figure not to scale
Source: Leavitt Architecture

building with a lower partial level for load-out and storage functions. The project would result in an addition of approximately 14,000 sf of space, including an approximately 11,500-sf addition on the main level and an approximately 2,500-sf addition on the lower level. The West Wing structure would be approximately 35 feet wide along the northern side and approximately 115 feet wide along the southern side. It would extend approximately 45 feet in height to the top of the roofline, or approximately 8 feet below the ridgeline of the existing Transfer Station. While the west elevations would have a maximum perceived height (low point to eave) of approximately 46 feet, the building height would be approximately 40 feet per the Planning Department's height definition (existing grade to midpoint of sloped roof). The main level would contain an approximately 100-sf office and a single restroom, while the rest of the addition would be dedicated to circulation, resource recovery, and waste processing activities. Photovoltaic panels would be installed on the rooftop of the proposed addition.

One new loading space would be provided at the lower partial level of the new structure, at the southern edge of the project site. Vehicular traffic would not routinely flow through the new building. Rather, regular vehicle traffic would continue to enter through the northwest side of the Transfer Station, unload in the pit or on the tipping floor, and then proceed out the southwest door as currently occurs. Waste material from the tipping floor designated for processing in the new West Wing building would be moved from the Transfer Station by a grapple and conveyor system or pushed by a loader tractor through several internal openings between the existing Transfer Station and the new building.

Currently MSW delivered to the Transfer Station by waste collection vehicles is dumped into the transfer pit, compacted, and loaded into long-haul trucks for transport to landfill for disposal. With project implementation, select loads of resource-rich MSW would be diverted from the transfer pit, inspected and processed by various mechanical and manual means to recover useful recyclable, digestible, and compostable materials. Waste materials recovered by processing in the West Wing would be transported off-site to composting, anaerobic digestion, or traditional recycling facilities. Non-usable waste materials would be redirected back to the Transfer Station transfer pit for disposal. All of the waste that would be processed inside the West Wing would be from sources that currently pass through the existing solid waste Transfer Station -- approximately two thirds of it paper and food waste -- hence, there would be no change in the type or volumes of waste received at the Recology San Francisco solid waste facility. Furthermore, the proposed project would also not result in changes to vehicle traffic volumes or hours of operation or public access. All new processing equipment that would be used on the premises would be powered by electricity. Depending on the type and configuration of equipment placed inside the new building an air quality permit may be required in the future (from the Bay Area Air Quality Management District, or BAAQMD), although it is not being sought at this time.

The proposed foundation for the addition would consist of grade beams, drilled shafts, or micropiles founded on or in bedrock. The proposed project would require excavation to a depth of approximately 14 feet below grade and the removal of approximately 3,000 cubic yards of soil (primarily, the existing sloped rock outcropping).

The proposed project also includes the construction of three retaining walls to the west of the new West Wing structure as well as roadway reconfiguration and regrading to accommodate the new structure. The largest retaining wall would be constructed west of the proposed building. It would be comprised of three segments, totaling approximately 90 feet in length and ranging from 2 feet to 7 feet in height. The two smaller retaining walls would be constructed at the northwest and southwest building corners. These would be roughly 16 feet long by 3 feet high and 30 feet long by 4 feet high, respectively. Excavation to accommodate the construction of the retaining walls is expected to range from approximately 5 to 20 feet bgs. Roadway improvements would be undertaken in order to vertically align the road with the West Wing structure's loading bay (at the lower level) to allow for truck turnouts and backups.

Project construction is anticipated to begin mid-2015 and would last approximately 13 months.

Project Approvals

The proposed project would require the following project approvals:

- Demolition and building permits from the Department of Building Inspection;
- Site Mitigation Plan for review and approval by the San Francisco Department of Public Health prior to commencement of any excavation work;
- Erosion and Sediment Control Plan for review and approval by San Francisco Public Utilities Commission.
- **Amendment to the Transfer Processing Report to the existing Solid Waste Transfer and Recycling Facility Solid Waste Facility Permit and additional requirements as determined by San Francisco DPH, acting as the designated Local Enforcement Agency on behalf of the Department of Resources Recycling and Recovery (CalRecycle)**

Approval Action: If discretionary review before the Planning Commission is requested, the discretionary review hearing is the Approval Action for the project. If no discretionary review is requested, the issuance of a building permit by the Department of Building Inspection (DBI) is the Approval Action. The Approval Action date establishes the start of the 30-day appeal period for this CEQA exemption determination pursuant to Section 31.04(h) of the San Francisco Administrative Code.

B. PROJECT SETTING

The project site is comprised of a single parcel located at 501 Tunnel Avenue in the Visitacion Valley neighborhood in San Francisco, just north of the City's southern boundary with the City of Brisbane. The immediate project site is within the larger Recology facility, which, as noted above, contains industrial structures separated by driveways, equipment and vehicle storage areas, and garden buffer areas. The adjacent Transfer Station receives and ships municipal solid waste (MSW), recyclable materials (including commercial and residential organic waste), and construction and demolition (C&D) debris collected within San Francisco. The C&D debris is first delivered to the Integrated Materials Recovery Facility, which abuts the Transfer Station to the east, where it is sorted; any waste that remains after sorting is delivered via a conveyor belt to the

adjacent Transfer Station. The Transfer Station is permitted to receive up to 5,000 tons of MSW per day.

Surrounding land uses include a mix of industrial, commercial, office, retail, and residential uses as well as public uses and vacant lots. A small neighborhood park, Little Hollywood Community Park, is situated along part of the property's northern boundary. The park is separated from the Recology facility by a vegetated buffer zone, ranging in width from 50 to 450 feet, which is within the boundaries of the proposed project and characterized by a steep rock slope with vegetation and art installations (the proposed project would not reduce or otherwise affect this buffer). To the north of the site (north of the Little Hollywood Community Park) is the single family residential neighborhood of Little Hollywood. This neighborhood is dominated by single-family homes, ranging from one to three stories in height, on uniform lots, and also contains a church. South of the Recology facility are industrial uses, including a pipe distributor and an active dirt/inert monofill and recycling operation. West of the project site is the Caltrain Bayshore station, beyond which is the vacant site of the future Visitation Valley Redevelopment project (also known as the Schlage Lock project) – this project will include up to 1,679 dwelling units and up to 20 commercial condominium units over 13 lots, together with parks, open spaces, pedestrian pathways and public streets. The closest commercial uses to the project site run along Bayshore Boulevard, approximately a third of a mile to the west of the project site. Among these are banks, automotive repair shops, convenience markets, restaurants, and office uses, some of which contain residential uses on the upper floors.

U.S. Highway 101 is directly east of the site, beyond which is the Executive Park office complex on the middle and lower slopes of Bayview Hill, Candlestick Point State Recreation Area, Candlestick Park Stadium (in the process of being demolished), single and multi-family residential areas, Bayview Park and adjacent open space, and the San Francisco Bay.

C. 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.	☒	☐
Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.	☐	☒
Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection, or from Regional, State, or Federal Agencies.	☐	☒

San Francisco Planning Code

The *San Francisco Planning Code (Planning Code)*, which incorporates 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 (1) the

proposed project conforms to the *Planning Code*, (2) allowable exceptions are granted pursuant to provisions of the *Planning Code*, or (3) amendments to the *Planning Code* are included as part of the proposed project.

Allowable Uses

As noted above, the northern portion of the site is within the Light Industrial (M-1) zoning district while the southern portion of the site is within the Heavy Industrial (M-2) zoning district. As discussed in Section 210.5 of the *Planning Code*, there are two types of districts that provide land for industrial development. In general, the M-1 Districts are more suitable for smaller industries dependent upon truck transportation, while the M-2 Districts are more suitable for larger industries served by rail and water transportation and by large utility lines. In M-1 Districts, most industries are permitted, but some with particularly noxious characteristics are excluded. The permitted industries have certain requirements related to enclosure, screening and minimum distance from residential districts. The M-2 districts are the least restricted as to use and permit heavier industries, with fewer requirements as to screening and enclosure than in M-1 Districts, but many of these uses are permitted only as conditional uses or at a considerable distance from residential districts. The existing operations at the project site are consistent with the land use designations in which the site is located and the proposed project would expand uses that already exist on the site. Therefore, the proposed project would be consistent with uses permitted within the M-1 and M-2 zoning districts.

Height and Bulk

The project site is located in a 40-X Height and Bulk District. The proposed addition would extend approximately 45 feet in height to the top of the roofline, approximately 8 feet below the ridgeline of the existing Transfer Station. While the west elevations would have a maximum perceived height (low point to eave) of approximately 46 feet, the building height would be approximately 40 feet per the Planning Department's height definition (existing grade to midpoint of sloped roof), and therefore, would conform to the 40-foot height limit. The "X" Bulk District does not impose bulk limitations for sites within this height district. Thus, the proposed project would comply with the 40-X Height and Bulk District limits.

Plans and Policies

San Francisco General Plan

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 *General Plan* contains 10 elements (Commerce and Industry, Recreation and Open Space, Housing, Community Facilities, Urban Design, Environmental Protection, Transportation, Air Quality, Community Safety, and Arts) that set forth goals, policies and objectives for the physical development of the City. Any conflict between the proposed project and policies that relate to physical environmental issues are discussed in Section E, Evaluation of Environmental Effects. The compatibility of the proposed 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.

Proposition M – The Accountable Planning Initiative

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the *Planning Code* to establish eight Priority Policies. These policies, and the topics of the Evaluation of Environmental Effects 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 4a, 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 3a, Cultural Resources); and (8) protection of open space (Questions 8a and b, Wind and Shadow, and Questions 9a and c, Recreation).

Prior to issuing a permit for any project that requires an Initial Study under the California Environmental Quality Act (CEQA), and prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action that requires a finding of consistency with the *General Plan*, the City is required to find that the proposed project or legislation would be consistent with the Priority Policies.

As noted above, the compatibility of the proposed project with *General Plan* objectives and 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. Any potential conflicts identified as part of the process would not alter the physical environmental effects of the proposed project.

Regional Plans and Policies

The five principal regional planning agencies and their over-arching policy-plans to guide planning in the nine-county bay area include the Association for Bay Area Governments' (ABAG) *Projections 2009*, the Bay Area Air Quality Management District's (BAAQMD's) *Bay Area 2010 Clean Air Plan (2010 Clean Air Plan)*, the Metropolitan Transportation Commission's Regional Transportation Plan – Transportation 2035, the San Francisco Regional Water Quality Control Board's San Francisco Basin Plan, and the San Francisco Bay Conservation and Development Commission's *San Francisco Bay Plan*. Due to the size and nature of the proposed project, no anticipated conflicts with regional plans would occur.

D. SUMMARY OF ENVIRONMENTAL EFFECTS

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

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

This Initial Study examines the proposed project to identify potential effects on the environment. For each item on the Initial Study checklist, the evaluation has considered the impacts of the proposed project both individually and cumulatively. All items on the Initial Study Checklist that have been checked "Less than Significant Impact with Mitigation Incorporated," "Less than Significant Impact," "No Impact" or "Not Applicable," indicate that, upon evaluation, staff has determined that the proposed project could not have a significant adverse environmental effect relating to that issue. A discussion is included for those issues checked "Less than Significant Impact with Mitigation Incorporated" and "Less than Significant Impact" and for most items checked with "No Impact" or "Not Applicable." For all of the items checked "No Impact" or "Not Applicable" without discussion, the conclusions regarding potential significant adverse environmental effects are based upon field observation, staff experience and expertise on similar projects, and/or standard reference material available within the 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 Game. For each checklist item, the evaluation has considered the impacts of the proposed project both individually and cumulatively. The items checked above have been determined to be "Less than Significant with Mitigation Incorporated."

E. 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>
1. LAND USE AND LAND USE PLANNING - Would the project:					
a) Physically divide an established community?	☐	☐	☒	☐	☐
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?	☐	☐	☒	☐	☐
c) Have a substantial impact upon the existing character of the vicinity?	☐	☐	☒	☐	☐

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

The proposed project includes the construction of a new one-story, approximately 14,000-sf structure (West Wing) that would abut the existing Transfer Station on the west side, construction of three retaining walls to the west of the West Wing structure, and roadway improvements intended to vertically align the road with the West Wing structure's loading bay. The West Wing structure would extend approximately 45 feet in height to the top of the roofline (per Planning Department's height definition, which is from existing grade to midpoint of sloped roof, it would be approximately 40 feet tall). The structure would contain approximately 11,500 sf of space on the main level and approximately 2,500 sf of space on the lower level.

The proposed project would be constructed entirely within the Recology facility boundaries and would not interfere with or change the existing street plan nor impede the passage of persons and vehicles. Therefore, impacts related to physically dividing an established community would be less than significant.

Impact LU-2: The proposed project would be consistent with 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. (Less than Significant)

The proposed project would not substantially conflict with any applicable land use plan, policy, or regulation such that an adverse physical change would result (see Section C. Compatibility with Existing Zoning and Plans). Environmental plans and policies are those, like the *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 proposed project would not substantially conflict with any such adopted environmental plan or policy and this impact would be less than significant.

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

The project site is currently a vacant, sparsely vegetated mound surrounded by undeveloped vegetated sloped and flat paved areas. As discussed above, the Recology complex spans approximately 44 acres and the immediate project site is surrounded by other structures associated with solid waste processing activities, including a public disposal and recycling area, scales, a fueling station, vehicle storage and maintenance areas, an environmental learning center, and Recology offices. Beyond the Recology facility boundaries are residential and industrial uses, as discussed above, under Project Setting. The project site is industrial in character and is separated from the nearest residential uses by a vegetated buffer. The proposed project includes the construction of a new one-story, approximately 14,000-sf structure (West Wing) that would abut the existing Transfer Station on the west side, construction of three retaining walls to the west of the West Wing structure, and roadway improvements intended to vertically align the road with the West Wing structure's loading bay. The structure would contain approximately 11,500 sf of space on the main level and approximately 2,500 sf of space on the lower level.

While it would result in an expansion of the existing solid waste processing use on the project site, the proposed use would be similar in character with the predominant uses in the immediate project area. Moreover, the proposed project would include uses that are permitted and already exist in the immediate project vicinity (i.e., the Recology facility). Therefore, the proposed project would not have a substantial impact on the existing character of the project's vicinity.

Impact C-LU-1: The proposed project, in combination with past, present, and reasonably foreseeable future project in the vicinity of the project site, would result in less-than-significant cumulative impacts to land use. (Less than Significant)

The proposed Recology Modernization and Expansion Project is the most notable cumulative project in the project vicinity. This proposed project consists of a comprehensive redevelopment of its Tunnel Avenue facility to provide new infrastructure for managing the City of San Francisco's solid waste stream. This project would involve replacing most of the buildings currently on the site with new recycling and resource recovery facilities, maintenance facilities, administrative offices, and supporting operations buildings, for a total of approximately 213,000 square feet of new building space. The majority of new construction would take place on the Brisbane side of Recology's property. The City of Brisbane, serving as the lead agency for purposes of CEQA review, issued an NOP for the preparation of an Environmental Impact Report for the Recology Modernization and Expansion Project on April 14, 2015.

The Visitation Valley Redevelopment Program (also known as the Schlage Lock project) is another large-scale cumulative project in the project vicinity. It is located at 2201 Bayshore Boulevard, approximately one quarter mile to the northwest of the project site. An Environmental Impact Report was certified for this project in 2008² and an Addendum to that EIR was published in May 2014 for a modified development program. According to the most recent proposal that was analyzed in the May 2014 Addendum, the proposed Schlage Lock project would include up to approximately 1,680 dwelling units and up to 20 commercial units on 13

² San Francisco Planning Department, Visitation Valley Redevelopment Program Environmental Impact Report, certified December 18, 2008. This document is on file and available for public review as part of Case File No. 2006.1308E.

lots, together with parks, open spaces, pedestrian pathways and public streets. Another proposed project in the vicinity of the project site is the demolition of a one-story building and a construction of a four-story mixed use building at 101 Leland Avenue, also approximately one quarter mile to the northwest of the project site (just beyond the Schlage Lock site).

The Visitation Valley Redevelopment Program EIR and the subsequent Addendum for the modified project found that the proposed Schlage Lock project would result in less-than-significant land use impacts. Furthermore, the project at 101 Leland Avenue would also not result in any land use impacts, given its scale and scope. Thus, no cumulative impact to land use within the project site vicinity exists to which this project could potentially contribute.

Although the cumulative impacts associated with the Recology Modernization and Expansion Project are unknown, the proposed West Wing project would not divide any existing community, conflict with plans and policies established for protecting the environment, or affect the existing land use characteristics of the project site vicinity. Therefore, the proposed project have a less-than-significant contribution to cumulative land use impacts.

<i>Topics:</i>	<i>Less Than Significant</i>				
	<i>Potentially Significant Impact</i>	<i>with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
2. AESTHETICS – Would the project:					
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐	☐
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?	☐	☐	☒	☐	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐	☐
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?	☐	☐	☒	☐	☐

A visual quality/aesthetics analysis is somewhat subjective and considers the project 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 proposed project's specific building design would be considered to have a significant adverse environmental effect on visual quality only if it would cause a substantial and demonstrative negative change.

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

The project site is located within the Recology facility, approximately 300 feet from the corner of Lathrop and Tocoloma Avenues, in the Visitacion Valley neighborhood of San Francisco. The proposed project includes the construction of a new one-story, approximately 14,000-sf structure (West Wing) that would abut the existing Transfer Station on the west side, construction of three retaining walls to the west of the West Wing structure, and roadway improvements intended to vertically align the road with the West Wing structure's loading bay. The West Wing structure would extend approximately 45 feet in height to the top of the roofline (per Planning Department's height definition, which is from existing grade to midpoint of sloped roof, it would be approximately 40 feet tall). The structure would contain approximately 11,500 sf of space on the main level and approximately 2,500 sf of space on the lower level. The new building may be visible from the nearby Little Hollywood Park and some of the surrounding sidewalks, but is unlikely to be visible from other public open spaces and streets.

A project would have a significant effect on scenic vistas if it would substantially degrade important public view corridors and 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. Given the industrial and indistinct quality of structures scattered throughout the Recology complex, the project site is not considered to be a focus of major views. Although the project site may be visible from a limited number of public areas in the project vicinity, the proposed project would not be expected to affect existing view corridors in the area. The proposed structure would not exceed the scale of other buildings within the Recology facility, including that of the adjacent Transfer Station, which is approximately 44 feet in height. The new structure would be noticeable, but would not substantially alter scenic vistas or degrade or obstruct any publicly accessible scenic views. Similarly, given their size, neither the proposed retaining walls, nor the roadway improvements would be expected to alter scenic vistas or degrade or obstruct any publicly accessible scenic views.

Project construction would occur over approximately 13 months. Although construction activities would diminish the existing visual character of the project site, these activities would be limited in duration and would generally be screened from public views by the intervening slope vegetation. Therefore, the proposed project's construction would not have a significant impact on the existing visual character or quality of the site or its surroundings.

Changes to private views would differ based on proximity to the project site, quality of the view currently experienced, and relative sensitivity of the viewer. Although some minimally reduced private views (mainly from residential uses within the Little Hollywood neighborhood north of the project site) could be an unavoidable consequence of the proposed project, any change in private views would not exceed that commonly accepted in an urban setting. While this loss or change of views might be of concern to those property owners or tenants, it would not affect a substantial number of people and would not rise to a level considered to be a significant impact on the environment.

The proposed project would not substantially affect any existing public views or view corridors in the area, and any adverse effect upon private views would not be considered a significant impact on the environment, pursuant to CEQA.

Impact AE-2: The proposed project would not substantially damage any scenic resources which contribute to a scenic public setting. (Less than Significant)

Scenic resources are the visible physical features on a landscape (e.g. land, water, vegetation, animals, structures, or other features) which contribute to a scenic public setting. The existing vegetation on the site would be replaced by the proposed building; however, this vegetation is not considered a scenic resource that contributes to a scenic public setting. Therefore, its replacement with the proposed West Wing structure would result in a less-than-significant impact on scenic resources.

Impact AE-3: The proposed project would not result in a change to the existing visual character of the project site or substantially degrade the visual character or quality of the site and its surroundings. (Less than Significant)

A project would have a significant adverse effect on visual quality under CEQA only if it would cause a substantial and demonstrable negative change to the project site or its surroundings. Industrial uses and the flat terrain of the San Francisco Bay shoreline represent the predominant visual character in the vicinity of the project site. As discussed above, under Project Description, the Recology facility is surrounded by a mix of industrial, commercial, office, retail, and residential uses as well as public uses and vacant lots. To the north of the project site (north of the vegetated buffer and the Little Hollywood Community Park) is the single family residential neighborhood of Little Hollywood. To the west of the project site is the Caltrain Bayshore station and the vacant site of the future Visitation Valley Redevelopment project. To the east of the project site is U.S. Highway 101, beyond which is the Executive Park office complex on the middle and lower slopes of Bayview Hill, Candlestick Point State Recreation Area, Candlestick Park Stadium (in the process of being demolished), single and multi-family residential areas, Bayview Park and adjacent open space, and the San Francisco Bay.

The proposed project would be located within the existing Recology complex and would abut the existing Solid Waste Transfer Facility to the west. The structure would be approximately 35 feet wide along the northern side and approximately 115 feet wide along the southern side. It would extend approximately 45 feet in height to the top of the roofline, approximately 8 feet below the ridgeline of the existing Transfer Station. As discussed in the Project Description, while the west elevations would have a maximum perceived height (low point to eave) of approximately 46 feet, the building height would be approximately 40 feet per the Planning Department's height definition (existing grade to midpoint of sloped roof). The main level would contain a 100-sf office and a single restroom, while the rest of the addition would be dedicated to circulation and waste processing activities.

The proposed West Wing structure would be clad in metal, with metal frame windows and motorized roll-up doors. A photovoltaic array would be installed on the saw-toothed roof, which would be pitched along the building's edge. The retaining walls, which would range in height between 2 and 14 feet above grade, would be made of concrete. The implementation of the proposed project may be noticeable; however, the project would add a structure that would be similar to one that already exists on the project site in terms of size, materials, and overall visual

character. Thus, the proposed project would not be expected to substantially alter the existing visual character of the site or its surroundings in a demonstrably adverse manner. Moreover, the proposed project would not exceed the scale of other buildings within the Recology complex, which range in height from two to four stories. The closest structure to the project site are the IMRF, which is approximately 48 feet in height, and the Transfer Station, which is approximately 44 feet in height. For the above reasons, this impact would be less than significant.

Project construction would occur over 13 months. Although construction activities would diminish the existing visual character of the project site, these activities would be limited in duration. Therefore, the proposed project's construction would not result in a substantial degradation of the existing visual character or quality of the site or its surroundings.

Impact AE-4: The proposed project would create a new source of light and glare, but not to an extent that would adversely affect daytime or nighttime views in the area or which would substantially affect other people or properties. (Less than Significant)

The proposed project would construct a new one-story, approximately 14,000-sf structure abutting the existing Transfer Station building to accommodate future waste processing activities and equipment. The West Wing structure would extend approximately 45 feet in height to the top of the roofline (although per Planning Department's height definition, which is from existing grade to midpoint of sloped roof, it would be approximately 40 feet tall). The structure would contain approximately 11,500 sf of space on the main level and approximately 2,500 sf of space on the lower level. The proposed project would comply with Planning Commission Resolution 9212 (1981) that establishes guidelines aimed at limiting glare from buildings. As such, the proposed project would result in minimal sources of light and glare beyond what currently exists (illumination from the existing structures adjacent to the project site as well as lighting from adjacent luminaires). Because the proposed project would comply with Planning Commission Resolution 9212 and would minimally increase the amount of lighting on the project site, it would not have a substantial, negative impact. Based on the above analysis, impacts associated with light and glare would be less than significant.

Impact C-AE-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not have a substantial adverse cumulative impact to aesthetics. (Less than Significant)

Implementation of the proposed project, in combination with the cumulative projects described above in Section E.1, Land Use and Land Use Planning, would result in minimal change to the visual character of the project site vicinity and the immediate project site. As discussed above, under Impact C-LU-1, as of March 2015, active projects within a quarter mile of the project site include the Recology Modernization and Expansion Project, a large development at the Schlage Lock project site at 2201 Bayshore Boulevard and a mixed-use development project at 101 Leland Avenue. Based on the discussions above, the proposed project would not be expected to have a substantial adverse cumulative effect on a scenic vista, scenic resource, or existing visual character or quality of the site and its surroundings. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a considerable contribution to any cumulative aesthetics impact.

<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>
3. POPULATION AND HOUSING— 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)?	☐	☐	☒	☐	☐
b) Displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?	☐	☐	☒	☐	☐
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐	☐

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

In general, a project would be considered growth inducing if its implementation would result in substantial population increases and/or new development that might not occur if the project would not be implemented. The proposed project includes the construction of a new one-story, approximately 14,000-sf structure (West Wing) that would abut the existing Transfer Station on the west side, construction of three retaining walls to the west of the West Wing structure, and roadway improvements intended to vertically align the road with the West Wing structure's loading bay. The proposed project does not include residential uses. According to the project sponsor, the Recology facility would not need to hire new staff to operate the expanded facility; rather, existing Recology employees would staff the West Wing operations. Hence, the implementation of the proposed project would not be expected to directly increase population or employment or indirectly induce substantial population growth in the project area. Moreover, the proposed project also would not generate a substantial demand for additional housing in the context of Citywide employment growth. Therefore, the project would not contribute to population growth in either the neighborhood or citywide. Based on the above, the proposed project would result in a less-than-significant population impact.

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

The project site consists of a vacant, vegetated hillside adjacent to the existing Transfer Station and includes no residents. Therefore, no residential, employee, or housing unit displacement would result from the proposed project. Moreover, as stated above, the project would not result in an increase in employment; thus no increase in demand for additional housing would occur, and no construction of new housing would be necessary. The proposed project would result in no effect related to the displacement of people or creation of demand for additional housing.

Impact C-PH-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would result in less-than-significant cumulative impacts to population and housing. (Less than Significant)

As described above, the proposed project would not induce substantial population growth or have significant physical environmental effects on housing demand or population. For these reasons, the planning and building permit applications that are currently under review, as discussed above, could not interact with the proposed project to result in cumulative adverse impacts with respect to population and housing.

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

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
4. CULTURAL AND PALEONTOLOGICAL RESOURCES—Would the project:					
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?	☐	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐	☐

Impact CP-1: The proposed project would not result in a substantial adverse change in the significance of historic architectural resources. (Less than Significant)

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 an historical resource survey meeting certain criteria. Additionally, properties, which are not listed but are otherwise determined to be historically significant, based on substantial evidence, would also be considered a historical resource.

The project site, as well as the adjacent Transfer Station have a Planning Department Historic Resource Status of "C," which means that "absent additional information provided to the City, as

discussed below, that a property is significant pursuant to the criteria in Public Resources Code Section 5024.1, properties in this category will not be evaluated as historical resources.”³ Moreover, neither the project site nor the adjacent Transfer Station is located within the boundaries of any existing historic district or conservation district. Based upon this status classification, the subject property is not a historic resource as defined by CEQA.

The proposed project includes the construction of a new one-story, approximately 14,000-sf structure (West Wing) that would abut the existing Transfer Station on the west side, construction of three retaining walls to the west of the West Wing structure, and roadway improvements intended to vertically align the road with the West Wing structure’s loading bay. The West Wing structure would extend approximately 45 feet in height to the top of the roofline (however, per Planning Department’s height definition, which is from existing grade to midpoint of sloped roof, it would be approximately 40 feet tall). The structure would contain approximately 11,500 sf of space on the main level and approximately 2,500 sf of space on the lower level. Because the project site does not appear individually eligible for the California Register and is not near any potential historic district, the implementation of the proposed project is not expected to impact any formally designated or eligible historic resources or conservation districts, and the proposed project would have a less than significant impact on historic resources.

Impact CP-2: The proposed project would not result in damage to, or destruction of, as-yet unknown archeological remains, should such remains exist beneath the project site. (Less than Significant with Mitigation)

When determining the potential for encountering archeological resources, relevant factors include the location, depth, and the extent of excavation proposed, as well as any recorded information on known resources in the area. Subsurface construction for the proposed project would include excavations of approximately 14 feet to accommodate the proposed West Wing foundation (primarily the existing sloped rock outcropping), while excavation for the proposed retaining walls is expected to range from approximately 5 to 20 feet bgs. The removal of approximately 3,000 cubic yard of soil would be required. Because the site consists of bedrock covered by shallow soils, based on the results of a literature search, it is unlikely that the project would have any impact on archeological resources. However, in the San Francisco area, prehistoric and archeological sites generally are located along watercourses or along the coast or the bay shore, and because the project site is within such an environmental setting (close to the coastline), there is a possibility of prehistoric cultural resources beneath the project site. In light of this, Planning Department archeology staff reviewed the proposed project to determine if any archeological resources could be affected and determined that, based on the above, Mitigation Measure M-CP-2, Accidental Discovery, should be incorporated into the proposed project to ensure that it does not adversely affect any CEQA-significant archeological resources.⁴ With implementation of this mitigation measure, the project would not disrupt or adversely affect a prehistoric or historic archaeological site or property of cultural significance.

3 San Francisco Preservation Bulletin No. 16, City and County of San Francisco Planning Department CEQA Review Procedures for Historic Resources. Available online at: <http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=5340>. Accessed on December 16, 2014.

4 Email from Randall Dean to Environmental Planning Division staff, San Francisco Planning Department, *Preliminary Archeological Reviews*, May 23, 2014.

Mitigation Measure M-CP-2: Accidental Discovery

The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in *CEQA Guidelines* Section 15064.5(a)(c). The project sponsor shall distribute the Planning Department archeological resource "ALERT" sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, pile driving, etc. firms); or utilities firm involved in soils disturbing activities within the project site. Prior to any soils disturbing activities being undertaken each contractor is responsible for ensuring that the "ALERT" sheet is circulated to all field personnel including, machine operators, field crew, pile drivers, supervisory personnel, etc. The project sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) to the ERO confirming that all field personnel have received copies of the Alert Sheet.

Should any indication of an archeological resource be encountered during any soils disturbing activity of the project, the project Head Foreman and/or project sponsor shall immediately notify the ERO and shall immediately suspend any soils disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures should be undertaken.

If the ERO determines that an archeological resource may be present within the project site, the project sponsor shall retain the services of an archaeological consultant from the pool of qualified archaeological consultants maintained by the Planning Department archaeologist. The archeological consultant shall advise the ERO as to whether the discovery is an archeological resource, retains sufficient integrity, and is of potential scientific/historical/cultural significance. If an archeological resource is present, the archeological consultant shall identify and evaluate the archeological resource. The archeological consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by the project sponsor.

Measures might include: preservation in situ of the archeological resource; an archaeological monitoring program; or an archeological testing program. If an archeological monitoring program or archeological testing program is required, it shall be consistent with the Environmental Planning (EP) division guidelines for such programs. The ERO may also require that the project sponsor immediately implement a site security program if the archeological resource is at risk from vandalism, looting, or other damaging actions.

The project archeological consultant shall submit a Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describing the archeological and historical research methods employed in the archeological 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.

Copies of the Draft FARR shall be sent to the ERO for review and approval. 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 copy, one unbound copy and one unlocked, searchable PDF copy on CD three copies 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 or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.

With implementation of Mitigation Measure M-CP-2, to which the project sponsor has agreed, the proposed project's impacts to undocumented and unforeseeable archeological resources would be less than significant.

Impact CP-3: The proposed project would not indirectly destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant with Mitigation)

Paleontological resources include fossilized remains or traces of animals, plants and invertebrates, including their imprints, from a previous geological period. Collecting localities and the geologic formations containing those localities are also considered paleontological resources; they represent a limited, nonrenewable resource and once destroyed they could not 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 which may be fossiliferous, include sedimentary and volcanic formations.

Construction associated with the project would take place mainly on previously disturbed soils and bedrock and it is not expected that any subsurface paleontological resources would turn up during project construction. Subsurface construction for the proposed project would include excavations of approximately 14 feet to accommodate the proposed West Wing foundation (primarily the existing sloped rock outcropping), while excavation for the proposed retaining walls is expected to range from approximately 5 to 20 feet bgs. The removal of approximately 3,000 cubic yard of soil would be required. The site is underlain by shallow soils (made up of silty sand), beneath which is bedrock of the Franciscan Assemblage that outcrops the site and is composed of massive to thinly bedded sandstone, thinly interbedded sandstone and shale, siltstone, greenstone, and chert. Although the potential for project construction to disturb potentially fossiliferous sediments of the Franciscan formation is low, project excavation nevertheless has the potential to affect geologic units that might contain paleontological remains or trace of paleontological remains. Implementation of Mitigation Measure M-CP-3, as outlined below, would ensure that any impacts related to potential disturbance on paleontological resources remain less than significant. With implementation of Mitigation Measure M-CP-3, to which the project sponsor has agreed, the proposed project would result in less-than-significant impacts to paleontological resources.

Mitigation Measure M-CP-3 - Paleontological Training Program and Alert Sheet

To reduce the potential for the proposed project to result in a significant impact on paleontological resources, the SFRPD shall arrange for a paleontological training by a qualified paleontologist regarding the potential for such resources to exist in the project site and how to identify such resources. The training shall also include a review of penalties for

looting and disturbance of these resources. An alert sheet shall be issued and shall include the following:

1. A discussion of the potential to encounter paleontological resources;
2. Instructions for reporting observed looting of a paleontological resource; and instruct that if a paleontological deposit is encountered within a project area, all soil-disturbing activities in the vicinity of the deposit shall cease and the ERO shall be notified immediately.

If an unanticipated paleontological resource is encountered during project activities, all project activities shall stop, and a professional paleontologist shall be hired to assess the potential paleontological resource and its significance. The findings shall be presented to the ERO, who shall determine the additional steps to be taken before work in the vicinity of the deposit is authorized to continue.

Impact CP-4: The proposed project would not disturb human remains. (Less than Significant)

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, the lead agency is required to work with the appropriate tribal entity, as identified by the California Native American Heritage Commission (NAHC). The CEQA 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 the dedicated cemetery (Health and Safety Code Section 7050.5) and the requirements of CEQA pertaining to Native American human remains. The 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 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). The project site has not been identified as a site with potential Native American burials. As such, the project is not anticipated to disturb any human remains, include Native American burials.

Impact C-CP-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not result in cumulative impacts to cultural resources. (Less than Significant)

As discussed above, the proposed project would result in a less-than-significant historic architectural resource impact. Cumulative impacts occur when impacts that are significant or less than significant from a proposed project combined with similar impacts from other past, present, or reasonably foreseeable future projects in a similar geographic area.

Archeological resources are non-renewable members of a finite class. All adverse effects to archeological resources erode a dwindling cultural/scientific resource base. Federal and state laws protect archeological resources in most cases, either through project redesign or requiring that the scientific data present within an archeological resource be archeologically recovered.

Project construction would occur in terrain which is underlain by sandstone, shale, siltstone, greenstone, and chert, and would involve grading and excavation to a maximum of approximately 20 feet. Due to the low likelihood of encountering archeological or paleontological resources, or of encountering human remains resources during construction, and with implementation of Mitigation Measures M-CP-2 and M-CP-3, the proposed project would not, individually or in combination with existing and future projects, result in a significant impact on cultural resources within the project site and in the site's vicinity.

<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>
5. TRANSPORTATION AND CIRCULATION— 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?	☐	☐	☒	☐	☐
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?	☐	☐	☒	☐	☐
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?	☐	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	☐	☐	☒	☐	☐
e) Result in inadequate emergency access?	☐	☐	☒	☐	☐
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?	☐	☐	☒	☐	☐

The project site is not located within an airport land use plan area, or in the vicinity of a private airstrip. The proposed project would not interfere with air traffic patterns. Therefore, topic 4c is not applicable.

Setting

The site, situated just west of U.S. Highway 101 (Bayshore Freeway or U.S. 101) at the Candlestick Park exit and across Tunnel Avenue from the Caltrain Bayshore Station, is served by

local streets and by portions of the regional freeway system. Access to and from U.S. 101 is provided by northbound ramps at Harney Way (via Alana Way), and southbound ramps at the Alana Way/Beatty Avenue intersection. In the vicinity of the project site, Alana Way, Beatty Road, and Tunnel Avenue provide direct access to the site. Each of these roadways is essentially a two-lane road, with additional turning lanes at some intersections. Harney Way is a three-lane, undivided road that skirts the shore of San Francisco Bay, and carries traffic to and from U.S. 101. To the north of the project site, Tunnel Avenue connects with Bayshore Boulevard, and also intersects with Blanken Avenue, a two-lane residential street in the Little Hollywood neighborhood that extends to the east under U.S. 101 to Executive Park Boulevard. South of Beatty Avenue, Tunnel Avenue serves various commercial and industrial properties in the City of Brisbane, connecting with Bayshore Boulevard about 1.5 miles from Beatty Avenue. In addition, Recycle Road, a private roadway, runs within the boundaries of the Recology facility.

On-site operations occur 24 hours per day, seven days a week, 365 days a year, with the majority of activity occurring during the weekday daytime hours. The daily peak hour for total trips generated by on-site activities occurs during the midday, i.e., not during peak (commute) traffic hours on area roadways. The general public (chiefly San Francisco residents) accesses the site facilities via Recycle Road off Tunnel Avenue, south of Blanken Avenue or via the Candlestick Park exit, Beatty Road, and Tunnel Avenue. Vehicles transporting recyclable materials and garbage collection vehicles use U.S. 101, with origins/destinations in San Francisco, via the Candlestick Park exit. Large transfer trucks traveling to and from the Altamont Landfill and Resource Recovery Facility in Alameda County use either U.S. 101 North (via the San Francisco – Oakland Bay Bridge), or U.S. 101 South (via the San Mateo Bridge), and enter and exit the site via the Alana Way gate.

Access to the Transfer Station is provided via internal roadways within the Recology facility. The Transfer Station averages 268 Recology loads⁵ per day or 1,340 per week on a 5-day basis. Other company vehicles average 9 loads per day or 45 loads per week. Thus, the total average weekly traffic to and from the Transfer Station is approximately 277 trips per day or approximately 1,385 trips per week.

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)

The proposed project would not include any activities that would conflict with any applicable transportation or congestion management plan, ordinance, or policy. While vehicles would be used during project construction, the frequency of trips by these vehicles would be minimal. As discussed above, under Population and Housing, Recology would not initially hire any additional employees to operate the West Wing; rather, it would be staffed by existing Recology employees. The increase in the traffic volume resulting from the proposed project, which would be constructed over approximately 13 months, would be negligible compared to the overall traffic volume in the project site vicinity or the San Francisco Bay Area.

⁵ One load refers to one trip into/out of the facility.

The West Wing project would be implemented entirely within the secure Recology facility, which is not accessible to the general public. The proposed structure would serve as a testing location for different combinations of equipment to extract useable resources from municipal solid waste; thus, it is not anticipated that the proposed structure would induce an increase in traffic to the project site. As such, the project would not be expected to generate a substantial number of additional visitors to the project site.

The pattern of traffic within the new building would depend on the configuration and use at any given time. In some cases, regular vehicle traffic would not flow through the new building at all but rather would continue to unload within the Transfer Station as under existing conditions. Waste material designated for processing in the new West Wing building in this instance would be moved from the Transfer Station by a grapple and conveyor system or pushed by a loader tractor through internal doorways between the Transfer Station and the West Wing structure. Vehicle traffic would continue to enter through the northwest side of the Transfer Station, unload in the pit or on the tipping floor, and then proceed out the southwest door as usual.

In other processing configurations, there may be a need for trucks to enter the West Wing building from the entrance to the north or one of the internal doorways between the two buildings, backup or turnaround within the West Wing building, and then exit again through one of the same doors. These types of vehicle backup and turnaround maneuvers would be carried out similarly to how they are done routinely throughout the City during collection and at the Recology facility during unloading and would not be expected to substantially increase hazards.

Since all of the waste that would be processed within the proposed West Wing facility is waste that would otherwise be passing through the Transfer Station, about two thirds paper and food waste based on recent waste characterizations, there would be no change in the type or amount of waste processed by Recology San Francisco.

For the reasons above, the proposed project would not be expected to generate substantially more traffic over existing levels following project construction. As a result, the proposed project would not increase traffic such that the project would result in exceedance of any level of service standard; therefore, this impact is less than significant.

Impact TR-2: The proposed project would not substantially increase hazards due to a design feature or incompatible uses. (Less than Significant)

The project site is located entirely within the Recology facility. The proposed project includes the construction of a new one-story, approximately 14,000-sf structure (West Wing) that would abut the existing Transfer Station on the west side, construction of three retaining walls to the west of the West Wing structure, and roadway improvements intended to vertically align the road with the West Wing structure's loading bay.

The proposed project does not include any design features that would substantially increase traffic hazards (e.g., creating a new sharp curve or dangerous intersections), and would not include any incompatible uses, as discussed above in Section E.1, Land Use and Land Use Planning. The proposed project does not include any changes to existing roadways (outside of the project site). As discussed above, under TR-1, vehicle traffic may or may not flow through the new building. Waste vehicles would continue to unload within the Transfer Station, as under existing conditions. Waste material designated for processing in the new West Wing building

would be moved from the Transfer Station by a grapple and conveyor system or pushed by a loader tractor through internal doorways between the Transfer Station and the West Wing structure. Vehicle traffic would continue to enter through the northwest side of the Transfer Station, unload in the pit or on the tipping floor, and then proceed out the southwest door as usual. Hence, vehicular circulation at the project site and the adjacent Transfer Station would continue to operate as under existing conditions. Other project processing considerations may create a need for trucks to drive through, backup, or turnaround within the West Wing building. These types of vehicle backups/turnarounds would be carried out similarly to existing movements throughout the Recology facility, and would not be expected to substantially increase hazards.

Therefore, impacts associated with increased traffic hazards resulting from the proposed project would be less than significant.

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

The proposed project would be implemented within the existing boundaries of the Recology facility. Emergency access would remain unchanged from the existing conditions. Emergency vehicles would continue to access the site off of Tunnel Avenue. The proposed project would not inhibit emergency access to the project site, nor would the proposed project affect emergency response times or access to other sites. It would not close off any existing streets or entrances to public uses. Therefore, the project would have a less than significant impact on emergency access to the project site or any other surrounding sites.

Impact TR-4: The proposed project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such features. (Less than Significant)

The proposed project would be implemented entirely within the boundaries of the Recology facility, which does not contain any transit, bicycle, or pedestrian facilities. Therefore, the proposed project would not conflict with any adopted policies, plans or programs regarding public transit, nor impact any bicycle or pedestrian facilities. During the construction period, several equipment storage and staging areas would be established in the project area. None of these storage and staging areas would significantly affect the performance or safety of such features, since they too would be located within the Recology facility. The proposed project would essentially expand an existing waste processing facility in order to accommodate new equipment that would serve as a testing ground to extract useable resources from municipal solid waste.

Impact C-TR-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would result in less-than-significant cumulative transportation impacts. (Less than Significant)

As described above, the proposed project's trips during the operational phase would not change as compared to existing conditions, and thus, the project would not affect the overall volume of trips in the area. The number of trips associated with cumulative projects in the vicinity would be dispersed throughout the local roadway and transit networks and could have a substantial adverse impact on the transportation system. The majority of project trips would occur outside of

the PM peak hour, where there is typically excess capacity available. Growth of the city would occur over time, resulting in a greater number of trips in the future, but the number of trips generated by the proposed project would be negligible and would not be considerable. While the proposed project's construction may occur concurrently with other projects, it is not expected that the construction schedule of the proposed project would be in conflict with other projects in the area. As required, the project sponsor and construction contractors would meet with the City's Transportation Advisory Staff Committee (TASC) to determine feasible methods to reduce traffic congestion, including effects on the transit system and pedestrian circulation impacts during construction of the proposed project. The TASC's analysis of the project would include coordination of any construction-related lane closures resulting from other nearby projects, which are unlikely to be required for the proposed project. The impact from construction traffic would be temporary and would not cause a substantial adverse change on the transportation system. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable transportation and circulation impact.

<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>
6. NOISE—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?	☐	☐	☒	☐	☐
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐	☐
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐	☐
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐	☐
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?	☐	☐	☐	☐	☒
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?	☐	☐	☐	☐	☒
g) Be substantially affected by existing noise levels?	☐	☐	☒	☐	☐

The project site is not located within an airport land use plan area, or in the vicinity of a private airstrip. Therefore, topics 5e and 6f are not applicable.

Impact NO-1: The proposed project would not result in a substantial permanent increase in ambient noise levels in the project vicinity, expose persons to noise levels in excess of standards established in the local general plan or noise ordinance, or be substantially affected by existing noise levels. (Less than Significant)

Substantial Permanent Increase in Ambient Noise Levels

Environmental noise is usually measured in A-weighted decibels (dBA).⁶ Environmental noise typically fluctuates over time, and different types of noise descriptors are used to account for this variability. Typical noise descriptors include the energy-equivalent noise level (Leq) and the day-night average noise level (Ldn).⁷ The Ldn is commonly used in establishing noise exposure guidelines for specific land uses.

Noise levels are measured on a logarithmic scale, instead of a linear scale. On a logarithmic scale, the sum of two noise sources of equal loudness is 3 dBA greater than the noise generated by just one of the noise sources (e.g., a noise source of 60 dBA plus another noise source of 60 dBA generate a composite noise level of 63 dBA). To apply this formula to a specific noise source, in areas where existing levels are dominated by traffic, a doubling in the volume of the traffic will increase ambient noise levels by 3 dBA. Generally, a three-dBA increase in ambient noise levels represents the threshold at which most people can detect a change in the noise environment; an increase of 10 dBA is perceived as a doubling of loudness.

The noise level experienced by a receptor depends on the distance between the source and the receptor, presence or absence of noise barriers and other shielding features, and the amount of noise attenuation (lessening) provided by the intervening terrain. For line sources, such as motor or vehicular traffic, noise decreases by about 3.0 to 4.5 dBA for every doubling of the distance from the roadway. For point or stationary noise sources, such as electric motors, a noise reduction of 6.0 to 7.5 dBA is experienced for each doubling of the distance from the source.

Sources of noise at the project site are associated with Transfer Station and IMFR sort line operations, namely trucks and other vehicles entering and exiting these facilities, loading and unloading of wastes, noise from sorting and conveying equipment, and noise associated with workers hand-separating debris from horizontal moving conveyors. Some attenuation of existing operational noise is provided by the shells of the Transfer Station and IMFR structures. In addition, the buffer areas along the project site's northern boundary also reduce Recology-originated noise experienced by residential uses in the Little Hollywood neighborhood. Other

⁶ A decibel (dB) is a unit of sound energy intensity. Sound waves, traveling outward from a source, exert a sound pressure level (commonly called "sound level") measured in dB. An A-weighted decibel (dBA) is a decibel corrected for the variation in frequency response of the typical human ear at commonly encountered noise levels.

⁷ Leq, the energy equivalent noise level (or "average" noise level), is the equivalent steady-state continuous noise level which, in a stated period of time, contains the same acoustic energy as the time-varying sound level that actually occurs during the same period. Ldn, the day-night average noise level, is a weighted 24-hour noise level. With the Ldn descriptor, noise levels between 10:00 p.m. and 7:00 a.m. are adjusted upward by ten dBA to take into account the greater annoyance of nighttime noise as compared to daytime noise.

off-site sources of noise in the project area include noise generated by traffic along Highway 101, aircraft operations from SFO, and Caltrain railroad operations, among others.

The Recology facility is subject to Article 29 of the San Francisco Police Code, which prohibits unnecessary, excessive, and offensive noises from all sources subject to its power. Section 2909 of the Code restricts noise levels generated by fixed noise sources, such as waste sorting and C&D debris recovery operations. This section states that, for commercial and industrial properties, such as the project site, "No person shall produce or allow to be produced by any machine or device, music or entertainment or any combination of same, on commercial or industrial property over which the person has ownership or control, a noise level more than eight dBA above the local ambient at any point outside of the property plane."

The proposed project includes construction of a new 14,000-sf building which would abut the existing transfer station on the west side and would be used for additional resource recovery and waste processing activities. The proposed project also includes the construction of three retaining walls to the west of the West Wing structure as well as roadway improvements to accommodate the new structure. The proposed project would not generate any additional vehicle trips since the amount and type of waste coming into and leaving the facility would not change from existing conditions. Therefore, the implementation of the proposed project would not double the volume of traffic in the project vicinity and thus, would not increase ambient noise levels by 3 dBA (a level where, as noted above, an increase in ambient noise level is typically perceived).

The proposed project would include new fixed noise sources that would produce operational noise on the project site. These would primarily include future equipment and machinery that would be used to test new methods of resource recovery and waste processing. While the exact types of machinery are not known, they would likely include shredders, screens (to filter waste into groups) and presses. All equipment would be enclosed within the proposed West Wing structure (which would substantially attenuate this type of noise) and is not expected to emit noise above ambient levels associated with the adjacent Transfer Station and the IMRF. While these fixed noise sources would be located slightly closer to the residences to the north, given the enclosed nature of the proposed equipment, the increase in noise levels anticipated at those noise receptors (as a result of the proposed project) would not be substantially greater than under existing conditions. Moreover, operation of this equipment would be subject to the City's Noise Ordinance (Article 29 of the San Francisco Police Code) and Section 2909(a)(1), which regulates noise levels generated by fixed noise sources and, as noted above, states that mechanical equipment operating on commercial or industrial property may not emit noise level more than eight dBA above the local ambient at any point outside of the property plane. This requirement would apply to the West Wing structure and would ensure that the proposed project does not expose residential uses north of the project site (and elsewhere) to noise levels in excess of standards.

For the above reasons, the proposed project would not result in a substantial permanent increase in ambient noise levels in the project vicinity or expose persons to noise levels in excess of standards established in the local general plan or noise ordinance.

Impact NO-2: During construction, the proposed project would result in a temporary or periodic increase in ambient noise levels and vibration in the project vicinity above levels existing without the project, but any construction-related increase in noise levels and vibration would be considered less than significant. (Less than Significant)

The proposed project's construction activities would last approximately 13 months. Construction noise and vibration would be intermittent and limited to the period of construction. The closest sensitive receptors to construction activities would be residents approximately 350 feet northwest of the project site. Construction activities would generate noise and vibration that could be considered an annoyance by occupants of nearby properties. Construction activities would require the use of heavy trucks, excavating and grading equipment, material loaders, concrete breakers, pile driving, and other mobile and stationary construction equipment. Construction noise and vibration would fluctuate depending on the construction phase, equipment type and duration of use, and distance between noise source and listener. The greatest construction-generating noise and vibration phases would generally be limited to excavation, new foundation construction, and exterior and façade element construction phases. Once the façade is in place, noise from interior finishing would generally be contained within the building envelope and would not be expected to generate excessive noise.

Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the Police Code), which requires noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA at 100 feet from the source. Impact tools must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Section 2908 of the Ordinance prohibits construction work between 8:00 PM and 7:00 AM 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. Although construction noise could be annoying at times, it would not be expected to exceed noise levels commonly experienced in this urban environment and would not be considered significant.

The most frequently used method to describe the effect of vibration on the human body is the root mean square (RMS) amplitude. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (Vdb) is commonly used to measure RMS. The decibel notation acts to compress the range of numbers required to describe vibration.⁸ Although it is possible that construction vibration would exceed levels that are considered an annoyance by adjacent residents, these annoyance levels would be temporary and thus not considered excessive. In conclusion, impacts related to temporary increases in noise and vibration during the construction phase would be less than significant because they would be subject to and would comply with regulations set forth in the Noise Ordinance and would also be limited in duration.

Impact C-NO-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would result in less-than-significant cumulative impacts to noise (Less than Significant)

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 proposed project, would be subject to the Noise Ordinance and thus would not be

⁸ FTA, May 2006, Table 8-1.

considered significant. Therefore, cumulative construction-related noise impacts would be less than significant.

The proposed project would not result in a substantial population growth in the project vicinity nor result in a doubling of traffic volumes along nearby streets; thus, it would not contribute considerably to any cumulative traffic-related increases in ambient noise. The EIR and the subsequent Addendum for the Visitacion Valley Redevelopment Program found that the redevelopment of the Schlage Lock site would result in significant noise impacts, but that implementation of mitigation measures would reduce such impacts to a less than significant level. As discussed above, the proposed project's construction and operational noise impacts would not be significant, would not be expected to contribute to any significant cumulative increases in the ambient noise level, and the proposed project would be required to comply with all applicable standards set forth in the Noise Ordinance. For these reasons, the proposed project would not result in cumulatively considerable noise impacts, and cumulative noise impacts 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>
7. AIR QUALITY—Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐	☐
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)?	☐	☒	☐	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐	☐

Setting

Overview

The Bay Area Air Quality Management District (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 (NO₂), sulfur dioxide (SO₂), 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 attainment⁹ or unclassified for most criteria pollutants with the exception of ozone, PM_{2.5}, and PM₁₀, 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.¹⁰

Land use projects may contribute to regional criteria air pollutants during the construction and operational phases of a project. Table 1 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.

⁹ "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 air pollutant.

¹⁰ Bay Area Air Quality Management District (BAAQMD), *California Environmental Quality Act Air Quality Guidelines*, May 2011, page 2-1.

Table 1
Criteria Air Pollutant Significance Thresholds

Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs./day)	Average Daily Emissions (lbs./day)	Maximum Annual Emissions (tons/year)
ROG	54	54	10
NO _x	54	54	10
PM ₁₀	82 (exhaust)	82	15
PM _{2.5}	54 (exhaust)	54	10
Fugitive Dust	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_x). 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 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_x, the offset emissions level is an annual average of 10 tons per year (or 54 pounds (lbs.) per day).¹¹ These levels represent emissions below which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants.

Although this regulation applies to new or modified stationary sources, land use development projects result in ROG and NO_x 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 ROG and NO_x emissions. Due to the temporary nature of construction activities, only the average daily thresholds are applicable to construction phase emissions.

Particulate Matter (PM₁₀ and PM_{2.5}).¹² The BAAQMD has not established an offset limit for PM_{2.5}. However, the emissions limit in the federal NSR for stationary sources in nonattainment areas is an appropriate significance threshold. For PM₁₀ and PM_{2.5}, 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

¹¹ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 17.

¹² PM₁₀ is often termed “coarse” particulate matter and is made of particulates that are 10 microns in diameter or smaller. PM_{2.5}, termed “fine” particulate matter, is composed of particles that are 2.5 microns or less in diameter.

emissions limits represent levels below which a source is not expected to have an impact on air quality.¹³ Similar to ozone precursor thresholds identified above, land use development projects typically result in particulate matter emissions as a result of increases in vehicle trips, space heating and natural gas combustion, landscape maintenance, and construction activities. Therefore, the above thresholds can be applied to the construction and operational phases of a land use project. Again, because construction activities are temporary in nature, 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.¹⁴ Individual measures have been shown to reduce fugitive dust by anywhere from 30 to 90 percent.¹⁵ The BAAQMD has identified a number of BMPs to control fugitive dust emissions from construction activities.¹⁶ The City's Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) requires a number of measures to control fugitive dust and the BMPs employed in compliance with the City's Construction 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 mortality. There are hundreds of different types of TACs with varying degrees of toxicity. Individual TACs vary greatly in the 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.¹⁷

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

13 BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 16.

14 Western Regional Air Partnership. 2006. *WRAP Fugitive Dust Handbook*. September 7, 2006. This document is available online at http://www.wrapair.org/forums/dej/fdh/content/FDHandbook_Rev_06.pdf, accessed February 16, 2012.

15 BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 27.

16 BAAQMD, *CEQA Air Quality Guidelines*, May 2011.

17 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.

with these uses have increased susceptibility to respiratory distress or, as in the case of residential receptors, their exposure time is greater than that for other land uses. Therefore, these groups are referred to as sensitive receptors. Exposure assessment guidance typically assumes that residences would be exposed to air pollution 24 hours per day, 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_{2.5}) are strongly associated with mortality, respiratory diseases, and lung development in children, and other endpoints such as hospitalization for cardiopulmonary disease.¹⁸ In addition to PM_{2.5}, 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.¹⁹ 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 conduct a citywide health risk assessment based on an inventory and assessment of air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed the “Air Pollutant Exposure Zone,” were identified based on health-protective criteria that considers estimated cancer risk, exposures to fine particulate matter, proximity to freeways, and locations with particularly vulnerable populations. Each of these criteria is discussed below.

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.²⁰ 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) rulemaking,²¹ 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.²²

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

18 SFDPH, *Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review*, May 2008.

19 California Air Resources Board (ARB), Fact Sheet, “The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines,” October 1998.

20 BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 67.

21 54 Federal Register 38044, September 14, 1989.

22 BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 67.

Assessment.” In this document, USEPA staff concludes that then federal annual PM_{2.5} standard of 15 µg/m³ should be revised to a level within the range of 13 to 11 µg/m³, with evidence strongly supporting a standard within the range of 12 to 11 µg/m³. The Air Pollutant Exposure Zone for San Francisco is based on the health protective PM_{2.5} standard of 11 µg/m³, as supported by the USEPA’s Particulate Matter Policy Assessment, although lowered to 10 µg/m³ to account for uncertainty in accurately predicting air pollutant concentrations using emissions modeling programs.

Proximity to Freeways. According to the California Air Resources board, studies have shown an association between the proximity of sensitive land uses to freeways and a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children. Siting sensitive uses in close proximity to freeways increases both exposure to air pollution and the potential for adverse health effects. As evidence shows that sensitive uses in an area within a 500-foot buffer of any freeway are at significant increased health risk related to their air pollutant exposures,²³ lots that are within 500 feet of freeways are included in the Air Pollutant Exposure Zone.

Health Vulnerable Locations. Based on the BAAQMD’s evaluation of health vulnerability in the Bay Area, those zip codes (94102, 94103, 94105, 94124, and 94130) in the worst quintile of Bay Area Health vulnerability scores as a result of air pollution-related causes were afforded additional protection by lowering the standards for identifying lots in the Air Pollutant Exposure Zone to: (1) an excess cancer risk greater than 90 per one million persons exposed, and/or (2) PM_{2.5} concentrations in excess of 9 µg/m³.²⁴

The above citywide health risk modeling was also used as the basis in approving a series of amendments to the San Francisco Building and Health Codes, generally referred to as the Enhanced Ventilation Required for Urban Infill Sensitive Use Developments or Health Code, Article 38 (Ordinance 224-14, effective December 8, 2014) (Article 38). The purpose of Article 38 is to protect the public health and welfare by establishing an Air Pollutant Exposure Zone and imposing an enhanced ventilation requirement for all urban infill sensitive use development within the Air Pollutant Exposure Zone. In addition, projects within the Air Pollutant Exposure Zone require special consideration to determine whether the project’s activities would add emissions to areas already adversely affected by poor air quality. The project site is located within the Air Pollutant Exposure Zone.

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)

23 California Air Resources Board, *Air Quality and Land Use Handbook: A Community Health Perspective*. April 2005. Available online at: <http://www.arb.ca.gov/ch/landuse.htm>.

Construction activities (short-term) typically result in emissions of ozone precursors and PM in the form of dust (fugitive dust) and exhaust (e.g., vehicle tailpipe emissions). Emissions of ozone precursors and PM are primarily a result of the combustion of fuel from on-road and off-road vehicles. However, ROGs are also emitted from activities that involve painting, other types of architectural coatings, or asphalt paving. The proposed project includes grading and excavation, placement of foundations, framing, exterior wall construction, and building interior construction. The construction of the three retaining walls and roadway improvements would overlap with the construction of the primary (West Wing) structure. During the project's approximately 13 month construction period, construction activities would have the potential to result in emissions of ozone precursors and PM, 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 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. According to the ARB, reducing particulate matter PM_{2.5} concentrations to state and federal standards of 12 µg/m³ in the San Francisco Bay Area would prevent between 200 and 1,300 premature deaths.²⁵

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 by the Department of Building Inspection (DBI).

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.

²⁵ ARB, *Methodology for Estimating Premature Deaths Associated with Long-term Exposure to Fine Airborne Particulate Matter in California*, Staff Report, Table 4c, October 24, 2008.

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. 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. CCSF Ordinance 175-91 restricts the use of potable water for soil compaction and dust control activities undertaken in conjunction with any construction or demolition project occurring within the boundaries of San Francisco, unless permission is obtained from the San Francisco Public Utilities Commission (SFPUC). Non-potable water must be used for soil compaction and dust control activities during project construction and demolition. The SFPUC operates a recycled water truck-fill station at the Southeast Water Pollution Control Plant that provides recycled water for these activities at no charge.

The proposed project site is less than one-half acre in size, so submittal of a Dust Control Plan will not be required; however, as discussed above, implementation of dust control measures pursuant to the Dust Control Ordinance would be required.

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 less-than-significant level.

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 1, 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 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 greenfield²⁶ 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.

²⁶ A greenfield site refers to agricultural or forest land or an undeveloped site earmarked for commercial, residential, or industrial projects.

The proposed project includes the construction of a new one-story, approximately 14,000-sf structure (West Wing) that would abut the existing Transfer Station on the west side, construction of three retaining walls to the west of the West Wing structure, and roadway improvements intended to vertically align the road with the West Wing structure's loading bay. The proposed project would be below the air pollutant screening criteria for "General heavy industry," which has a threshold of 1.9 million sf, as 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)

The project site is located within the Air Pollutant Exposure Zone as described above. The project does not propose sensitive uses. The nearest sensitive uses to the project site are residences located approximately 300 feet north of the project site, on the north side of the sloped, vegetated buffer that borders the northern boundary 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.²⁷ 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.²⁸ For example, revised PM emission estimates for the year 2010, which DPM is a major component of total PM, have decreased by 83 percent from previous 2010 emissions estimates for the SFBAAB.²⁹ 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.³⁰

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 are being phased in between 2008 and 2015. To meet the Tier 4 emission standards, engine manufacturers are 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_x and PM emissions will be reduced by more than 90 percent.³¹

27 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.

28 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*, October 2010.

29 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.

30 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*, October 2010.

31 USEPA, "Clean Air Nonroad Diesel Rule: Fact Sheet," May 2004.

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."³²

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

The proposed project would include construction activities for an approximately 13-month 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 Air Quality, 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 percent³³ 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 may not yet be available for engine

32 BAAQMD, *CEQA Air Quality Guidelines*, May 2011, page 8-6.

33 PM emissions benefits are estimated by comparing off-road PM emission standards for Tier 2 with Tier 1 and 0. Tier 0 off-road engines do not have PM emission standards, but the United States Environmental Protection Agency's Exhaust and Crankcase Emissions Factors for Nonroad Engine Modeling – Compression Ignition has estimated Tier 0 engines between 50 hp and 100 hp to have a PM emission factor of 0.72 g/hp-hr and greater than 100 hp to have a PM emission factor of 0.40 g/hp-hr. Therefore, requiring off-road equipment to have at least a Tier 2 engine would result in between a 25 percent and 63 percent reduction in PM emissions, as compared to off-road equipment with Tier 0 or Tier 1 engines. The 25 percent reduction comes from comparing the PM emission standards for off-road engines between 25 hp and 50 hp for Tier 2 (0.45 g/bhp-hr) and Tier 1 (0.60 g/bhp-hr). The 63 percent reduction comes from comparing the PM emission standards for off-road engines above 175 hp for Tier 2 (0.15 g/bhp-hr) and Tier 0 (0.40 g/bhp-hr). In addition to the Tier 2 requirement, ARB Level 3 VDECSs are required and would reduce PM by an additional 85 percent. Therefore, the mitigation measure would result in between an 89 percent (0.0675 g/bhp-hr) and 94 percent (0.0225 g/bhp-hr) reduction in PM emissions, as compared to equipment with Tier 1 (0.60 g/bhp-hr) or Tier 0 engines (0.40 g/bhp-hr).

sizes subject to the mitigation. Therefore, compliance with Mitigation Measure M-AQ-2 would result in less-than-significant construction emissions impacts on nearby sensitive receptors.

Mitigation Measure M-AQ-2: Construction Air Quality

The project sponsor or the project sponsor's Contractor shall comply with the following

A. Engine 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 have 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 have been retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy. Equipment with engines meeting Tier 4 Interim or Tier 4 Final off-road emission standards automatically meet this requirement.
2. Where access to alternative sources of power are available, portable diesel engines shall be prohibited.
3. Diesel engines, whether for off-road or on-road equipment, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions). The Contractor shall post legible and visible signs in English, Spanish, and Chinese, in designated queuing areas and at the construction site to remind operators of the two minute idling limit.
4. The Contractor shall instruct construction workers and equipment operators on the maintenance and tuning of construction equipment, and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications.

B. Waivers.

1. The Planning Department's Environmental Review Officer or designee (ERO) may waive the alternative source of power requirement of Subsection (A)(2) if an alternative source of power is limited or infeasible at the project site. If the ERO grants the waiver, the Contractor must submit documentation that the equipment used for onsite power generation meets the requirements of Subsection (A)(1).
2. The ERO may waive the equipment requirements of Subsection (A)(1) if: a particular piece of off-road equipment with an ARB Level 3 VDECS is technically not feasible; the equipment would not produce desired emissions reduction due to expected operating modes; installation of the equipment would create a safety hazard or impaired visibility for the operator; or, there is a compelling emergency need to use off-road equipment that is not

retrofitted with an ARB Level 3 VDECS. If the ERO grants the waiver, the Contractor must use the next cleanest piece of off-road equipment, according to the table below.

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 ERO determines that the equipment requirements cannot be met, then the project sponsor would need to meet Compliance Alternative

1. If the ERO determines that the Contractor cannot supply off-road equipment meeting Compliance Alternative 1, then the Contractor must meet Compliance Alternative 2. If the ERO determines that the Contractor cannot supply off-road equipment meeting Compliance Alternative 2, then the Contractor must meet Compliance Alternative 3.

** Alternative fuels are not a VDECS.

C. Construction Emissions Minimization Plan. Before starting on-site construction activities, the Contractor shall submit a Construction Emissions Minimization Plan (Plan) to the ERO for review and approval. The Plan shall state, in reasonable detail, how the Contractor will meet the requirements of Section A.

1. 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. The description may include, but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For VDECS installed, the description may include: 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, the description shall also specify the type of alternative fuel being used.
2. The ERO shall ensure that all applicable requirements of the Plan have been incorporated into the contract specifications. The Plan shall include a certification statement that the Contractor agrees to comply fully with the Plan.
3. The Contractor shall make the Plan available to the public for review on-site during working hours. The Contractor shall post at the construction site a legible and visible sign summarizing the Plan. The sign shall also state that the public may ask to inspect the Plan for the project at any time during working hours and shall explain how to request to inspect the Plan. The

Contractor shall post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way.

4. *Monitoring.* After start of Construction Activities, the Contractor shall submit quarterly reports to the ERO documenting compliance with the Plan. After completion of construction activities and prior to receiving a final certificate of occupancy, the project sponsor shall submit to the ERO a final report summarizing construction activities, including the start and end dates and duration of each construction phase, and the specific information required in the Plan.

Operational Air Quality Impacts

Land use projects typically result in emissions of criteria air pollutants and toxic air contaminants primarily from an increase in motor vehicle trips. However, land use projects may also result in criteria air pollutants and toxic air contaminants from combustion of natural gas, landscape maintenance, use of consumer products, and architectural coating. The following addresses air quality impacts resulting from operation 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)

As discussed above in Impact AQ-1, the BAAQMD, in its *CEQA Air Quality Guidelines* (May 2011), has developed screening criteria to determine whether a project requires an analysis of project-generated criteria air pollutants. If all the screening criteria are met by a proposed project, then the lead agency or applicant does not need to perform a detailed air quality assessment.

The proposed project includes the construction of a new one-story, approximately 14,000-sf structure (West Wing) that would abut the existing Transfer Station on the west side, construction of three retaining walls to the west of the West Wing structure, and roadway improvements intended to vertically align the road with the West Wing structure's loading bay. The number of future vehicle trips is not anticipated to increase with project implementation, since the amount of municipal solid waste delivered to the project site for processing would not be expected to change. The proposed project would be below the criteria air pollutant screening size for "General heavy industry" (1.9 million sf), as identified in the BAAQMD's *CEQA Air Quality Guidelines*. Thus, a quantification of project-generated criteria air pollutant emissions is not required, and the proposed project would not exceed any of the significance thresholds for criteria air pollutants. Based on the above, the proposed project would result in a less than significant impact with respect to criteria air pollutants.

Impact AQ-4: The proposed project would not generate toxic air contaminants, including diesel particulate matter, exposing sensitive receptors to substantial air pollutant concentrations. (Less than Significant)

As discussed above, the project site is located within the Air Pollutant Exposure Zone and the project does not propose sensitive uses. The nearest sensitive uses to the project site (residences)

are located approximately 350 feet northwest of the project site, on the north side of the sloped, vegetated buffer that borders the project site along the northwest.

Individual projects result in emissions of toxic air contaminants primarily as a result of an increase in vehicle trips. The BAAQMD considers roads with less than 10,000 vehicles per day “minor, low-impact” sources that do not pose a significant health impact even in combination with other nearby sources and recommends that these sources be excluded from the environmental analysis. The proposed project would not result in an increase of vehicle trips to the project site; therefore, an assessment of project-generated TACs resulting from vehicle trips is not required and the proposed project would not generate a substantial amount of TAC emissions that could affect nearby sensitive receptors. In addition, the future equipment used during operations of the project would be powered by electricity and would not emit toxic air contaminants, since high temperature conversion is prohibited throughout the Recology facility. For these reasons, this impact would be less than significant.

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.

The primary goals of the CAP are to: (1) reduce emissions and decrease concentrations of harmful pollutants, (2) safeguard the public health by reducing exposure to air pollutants that pose the greatest health risk, and (3) reduce greenhouse gas emissions. 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.

Most measures included in the 2010 Clean Air Plan would not apply to the proposed project given its unique characteristics (i.e., the project is an addition to an existing industrial facility); however, the proposed project would not conflict with any of the measures included in this document. Moreover, the proposed project’s impacts with respect to GHGs are discussed in Section 8, Greenhouse Gas Emissions, which demonstrate that the proposed project would comply with the applicable provisions of the City’s Greenhouse Gas Reduction Strategy.

The primary goal of the proposed project is to allow the Recology facility to process a larger portion of the municipal solid waste that would otherwise go to landfill and divert it to off-site composting, anaerobic digestion, re-use or recycling facilities. Thus, with project implementation, a larger proportion of solid waste would be composted off site and diverted from landfills. Moreover, since the project would not increase automobile trips or vehicle miles traveled, no air pollutant emissions related to vehicle trips would be expected. Therefore, the proposed project would include applicable control measures identified in the CAP to meet the CAP's primary goals.

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 add a structure adjacent to the existing Transfer Station to accommodate future waste processing activities and equipment. 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)

During project construction, diesel exhaust from construction equipment would generate some odors. However, construction-related odors would be temporary and would not persist upon project completion.

In terms of project operations, BAAQMD Rules and Regulations (specifically, Regulation 7) place general limitations on odorous substances and specific emission limitations on certain odorous compounds. BAAQMD Regulation 7 applies when and if the BAAQMD receives validated odor complaints regarding a specific facility from 10 or more complainants in a 90-day period. The regulation restricts emissions of odorous substances that cause the ambient air at or beyond the property line to remain odorous after dilution with four parts of odor-free air. BAAQMD also regulates odorous emissions through enforcement of the public nuisance provision in BAAQMD Regulation 1.

At the project site, one potential source of odorous emissions is the pit located within the Transfer Station that receives garbage from collection trucks and non-recyclable solid waste from the adjacent Integrated Materials Recovery Facility. For odor control, an odor-neutralizing agent is mixed with the water used in connection with the water spray system described above in relation to dust control. Individuals living in the Little Hollywood neighborhood and Candlestick Cove occasionally report perceiving odors from the Transfer Station area, particularly during inversion conditions or when light winds blow from the southeast.

One of the principal factors leading to off-site odor effects is the amount of time solid waste remains in the “pit” within the Transfer Station. The longer that waste remains in the pit, the more it has a tendency to putrefy and release odorous emissions. The current permit restriction which states that most waste must be hauled within 48 to 72 hours eliminates the prolonged accumulation of such wastes on the site with a corresponding decrease in the potential for off-site odor effects.

The nearest sensitive land use in the project vicinity is the Little Hollywood residential neighborhood, which is located north of the Recology facility. An approximately 50- to 350-foot buffer separates the closest residences to the activities associated with the project site.

Waste processing as part of the proposed project would not affect odorous emissions associated with the project site since the project would simply divert materials that are, and would otherwise continue to be, dumped into the pit at the adjacent Transfer Station for hauling to the landfill. Moreover, the processing of this waste within the West Wing structure would not emit additional odors that would not otherwise occur.

The organic materials that would be processed within the proposed West Wing structure would not be stored at the site for an extended period of time. As under existing conditions, under project conditions, organic materials that would be diverted to the West Wing would be subject to the same permit condition as other solid waste (i.e., a maximum duration of 48 hours at the site), and thus, would not accumulate at the site for substantial periods, which would minimize the potential for decomposition and odor. The proposed project would effectively relocate a portion of the materials that are currently processed at the Transfer Station to a new, adjacent building; thus, no change in the amount, duration, or intensity of odors would be expected at off-site locations. Moreover, consistent with state minimum standards as provided in Title 14 of the California Code of Regulations, standard odor and vector management practices associated with handling putrescible waste would be implemented within the West Wing structure, as well. In addition to the 48-hour limit on the duration of the organic material received, measures to discourage vectors in the Transfer Station - regular washing of the tipping floor, and trapping, baiting, and spraying as needed - would be implemented in the West Wing structure, as well. Therefore, the implementation of the proposed project would not constitute a significant impact in terms of odorous emissions or a substantial increase in the severity of existing odors. Therefore, odor impacts would be less than significant.

Cumulative Air Quality Impacts

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 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.³⁴ 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. While the project would not add any sensitive uses, the use of stationary construction equipment during the construction phase within an area already adversely affected by air quality has the potential to result in a considerable contribution to cumulative health risk impacts on sensitive receptors. This would be a significant cumulative impact. The proposed project would be required to implement **Mitigation Measure M-AQ-2: Construction Air Quality**, pages 44 to 46, which would reduce construction period emissions by as much as 94 percent. Implementation of this mitigation measure would reduce the project's contribution to cumulative air quality impacts to a less-than-significant level.

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

GHG emissions and global climate change represent cumulative impacts. GHG emissions cumulatively contribute to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature; instead, the combination of GHG emissions from past, present, and future projects have contributed and will contribute to global climate change and its associated environmental impacts.

The Bay Area Air Quality Management District (BAAQMD) has prepared guidelines and methodologies for analyzing GHGs. These guidelines are consistent with CEQA Guidelines Sections 15064.4 and 15183.5 which address the analysis and determination of significant impacts from a proposed project's GHG emissions. CEQA Guidelines Section 15064⁴ allows lead agencies to rely on a qualitative analysis to describe GHG emissions resulting from a project. CEQA Guidelines Section 15183.5 allows for public agencies to analyze and mitigate GHG emissions as

³⁴ BAAQMD, *CEQA Air Quality Guidelines*, May 2011, page 2-1.

part of a larger plan for the reduction of greenhouse gases and describes the required contents of such a plan. Accordingly, San Francisco has prepared Strategies to Address Greenhouse Gas Emissions (GHG Reduction Strategy)³⁵ which presents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco's Qualified GHG Reduction Strategy in compliance with CEQA guidelines. The actions outlined in the strategy have resulted in a 14.5 percent reduction in GHG emissions in 2010 compared to 1990 levels, exceeding the year 2020 reduction goals outlined in the BAAQMD's 2010 Clean Air Plan, Executive Order S-3- 05,³⁶ and Assembly Bill 32 (also known as the Global Warming Solutions Act).^{37,38}

Given that the City's local greenhouse gas reduction targets are more aggressive than the State and Region's 2020 GHG reduction targets and consistent with the long-term 2050 reduction targets, the City's Greenhouse Gas Reduction Strategy is consistent with the goals of EO S-3-05, AB 32, and the Bay Area 2010 Clean Air Plan. Therefore, proposed projects that are consistent with the City's Greenhouse Gas Reduction Strategy would be consistent with the goals of EO S-3-05, AB 32, and the Bay Area 2010 Clean Air Plan, would not conflict with these plans, and would therefore not exceed San Francisco's applicable GHG threshold of significance.

The following analysis of the proposed project's impact on climate change focuses on the project's contribution to cumulatively significant GHG emissions. Given the analysis is in a cumulative context, this section does not include an individual project-specific impact statement.

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

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 may increase the activity onsite by constructing a one-story, approximately 14,000-sf structure (West Wing), three retaining walls, and roadway improvements. However, the proposed project is unlikely to contribute to annual long-term increases in GHGs as a result of increased vehicle trips (mobile sources) since vehicle trips are not expected to change with project implementation. It is possible that the project could contribute to annual long-term increases in GHGs as a result of industrial operations that result in an increase in energy use, water use and wastewater treatment. Construction activities would also result in temporary increases in GHG emissions.

35 San Francisco Planning Department, *Strategies to Address Greenhouse Gas Emissions in San Francisco*, 2010. The final document is available online at: <http://www.sf-planning.org/index.aspx?page=2627>.

36 Executive Order S-3-05, sets forth a series of target dates by which statewide emissions of GHGs need to be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels (approximately 457 million MTCO₂E); by 2020, reduce emissions to 1990 levels (estimated at 427 million MTCO₂E); and by 2050 reduce emissions to 80 percent below 1990 levels (approximately 85 million MTCO₂E).

37 San Francisco Department of Environment (DOE), *San Francisco Climate Action Strategy*, 2013 Update.

38 The *Clean Air Plan*, Executive Order S-3-05, and Assembly Bill 32 goals, among others, are to reduce GHGs in the year 2020 to 1990 levels.

The proposed project would comply with and would, in fact, be implemented specifically to help meet several GHG reduction strategies as articulated in the City and County's GHG Reduction Strategy, particularly those related to diverting solid waste from landfills through increasing citywide recycling and composting (these are included in Section IV.IV, Climate Action Plan Solid Waste Actions of the GHG Reduction Strategy).

These regulations, as outlined in San Francisco's Strategies to Address Greenhouse Gas Emissions, have proven effective as San Francisco's GHG emissions have measurably reduced when compared to 1990 emissions levels, demonstrating that the City has met and exceeded EO S-3-05, AB 32, and the Bay Area 2010 Clean Air Plan GHG reduction goals for the year 2020. The proposed project was determined to be consistent with San Francisco's GHG Reduction Strategy.³⁹ Other existing regulations, such as those implemented through AB 32, will continue to reduce a proposed project's contribution to climate change. Therefore, the proposed project's GHG emissions would not conflict with state, regional, or 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.

<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>
9. WIND AND SHADOW—Would the project:					
a) Alter wind in a manner that substantially affects public areas?	☐	☐	☒	☐	☐
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	☐	☐	☒	☐	☐

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 large building masses extending substantially above their surroundings, and by buildings oriented so that a large wall catches a prevailing wind, particularly if such a wall includes little or no articulation. Average wind speeds in San Francisco are the highest in the summer and lowest in winter; however, the strongest peak winds occur in winter. Throughout the year the highest wind speeds occur in mid-afternoon and the lowest in the early morning. Westerly to northwesterly winds are the most frequent and strongest winds during all seasons. Of the primary wind directions, four have the greatest frequency of

³⁹ Greenhouse Gas Analysis: Compliance Checklist, West Wing Project, January 8, 2015. This document is available for review as part of Case File No. 2013.0850E at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, California 94103.

occurrence and also make up the majority of the strong winds that occur. These winds include the northwest, west-northwest, west, and west-southwest.

The project site is adjacent to the existing Transfer Station to the west and is currently undeveloped. It contains a steeply sloped vegetated portion (sloping downward toward the southwest) and surrounding flat areas. The proposed project would construct a new one-story, 45-foot-tall structure abutting the Transfer Station building, as well as three retaining walls to the west of the new structure and roadway improvements. Since the proposed structure would not be substantially taller than nearby buildings, the development in the project vicinity is generally of a low-rise nature, and the project site is not typically open to the general public, the project would not result in adverse effects on ground-level winds and would not have the potential to cause significant changes to the wind environment in pedestrian areas on or near the project site. Thus, the proposed project would result in a less-than-significant wind impact.

Impact WS-2: The proposed project would not result in new shadows in a manner that substantially affects outdoor recreation facilities or other public areas. (Less than Significant)

Planning Code Section 295, which was adopted in response to Proposition K (passed November 1984), mandates that new structures above 40 feet in height that would cast additional shadows on properties under the jurisdiction of, or designated to be acquired by, the Recreation and Parks Department (RPD) can only be approved by the Planning Commission (based on recommendation from the Recreation and Parks Commission) if the shadow is determined to be insignificant or not adverse to the use of the park. In addition, under CEQA, a detailed analysis of the shadow impacts is required for projects that could potentially cast new shadow on a park or open space such that the use or enjoyment of that park or open space could be adversely affected.

The nearest outdoor recreation facility to the project site under the jurisdiction of the Recreation and Park Department is the Little Hollywood Community Park, located at the corner of Lathrop and Tocoloma Avenues (approximately 250 feet northwest of the project site). Under the proposed project, the height to the top of the proposed structure's roofline would be approximately 45 feet. Therefore, a shadow fan was prepared to assess whether the shadow from the proposed structure would cast new shadow on the Little Hollywood Community Park.⁴⁰ According to the shadow fan, the proposed structure would not cast shadows on this park or any other recreational facility in the project area. Additionally, based on the shadow fan, the proposed project would not be expected to add any new shadow beyond the borders of the Recology facility. Thus, it is not anticipated that the project would add shadow on the surrounding properties or private residences. Therefore, the limited amount of shadow expected to be cast by the proposed project would not be considered a significant impact under CEQA.

Impact C-WS-1: The proposed project, in combination with other past, present, and reasonably foreseeable projects, would not result in less-than-significant wind and shadow impacts. (Less than Significant)

Based on the discussion above, the proposed project, along with other potential and future development in the vicinity, would not result in a significant wind or shadow impact in the

⁴⁰ Preliminary shadow fan, 501 Tunnel Avenue, December 29, 2014. This document is available for review as part of Case File No. 2013.0850E at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, California 94103.

project vicinity. Thus, the proposed project, in combination with cumulative projects considered in this analysis, would not be expected to contribute considerably to adverse wind or shadow effects under cumulative conditions, and cumulative wind or shadow impacts 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>
10. RECREATION—Would the project:					
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	☐	☐	☒	☐	☐
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☒	☐	☐
c) Physically degrade existing recreational resources?	☐	☐	☒	☐	☐

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

The nearest outdoor recreation facility to the project site under the jurisdiction of the Recreation and Park Department is the Little Hollywood Community Park, a 1.3-acre community park located at the corner of Lathrop and Tocoloma Avenues (approximately 250 feet northwest of the project site). The park contains a playground/play area and a full basketball court. The proposed project would not add any residents to the project area. Moreover, few new employees would be added to the project site. Thus, the implementation of the proposed project would not be expected to increase the demand for or use of nearby parks or recreational facilities. Therefore, it is unlikely that substantial physical deterioration would occur. In addition, the proposed project would not substantially increase demand for or use of citywide/regional facilities such as Golden Gate Park or any other recreational facilities. Therefore, the proposed project would not be expected to create a substantial contribution to the existing demand for existing neighborhood parks or other recreational facilities in this area and this impact would be less than significant.

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

The proposed project would not introduce a new permanent population to the project site, as it does not propose any residential uses. Moreover, no additional employees would be necessary to implement the proposed project. Thus, no increase in the demand for or use of either neighborhood parks or recreational facilities (discussed above) or citywide/regional facilities such as Golden Gate Park would be expected such that any increased user demand would require the construction of new recreational facilities or the expansion of existing facilities. Therefore, the

project would not result in the construction of recreational facilities that would themselves have physical environmental impacts.

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

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 includes the construction of a new one-story, approximately 14,000-sf structure (West Wing) that would abut the existing Transfer Station on the west side, construction of three retaining walls to the west of the West Wing structure, and roadway improvements intended to vertically align the road with the West Wing structure's loading bay. Therefore, the proposed project would not physically degrade existing recreational facilities.

Impact C-RE-1: The proposed project in combination with past, present, and reasonably foreseeable future projects in the vicinity, would result in less-than-significant cumulative impacts to recreation. (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. No other development in the project vicinity would contribute substantially to recreational cumulative effects. Additionally, future developments would be subject to *Planning Code* open space requirements. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable recreation impact.

<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>
11. UTILITIES AND SERVICE SYSTEMS— Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐	☐
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?	☐	☐	☒	☐	☐
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?	☐	☐	☒	☐	☐
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?	☐	☐	☒	☐	☐

<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) 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?	☐	☐	☒	☐	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐	☐

Impact UT-1: Implementation of the proposed project would not exceed wastewater treatment requirements, exceed the capacity of the wastewater treatment provider serving the project site, or result in the construction of new or expansion of existing wastewater treatment or stormwater drainage facilities. (Less than Significant)

Proposed project-related wastewater and stormwater would flow to the City's combined stormwater and sewer system and would be treated to 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 Bay. The NPDES standards are set and regulated by the San Francisco Bay Area Regional Water Quality Control (RWQCB); therefore, the proposed project would not conflict with RWQCB requirements.

Implementation of the proposed project would incrementally increase wastewater flows from the project site due to washing and maintenance within the proposed 14,000-sf industrial structure (i.e., power washing the floor and the equipment, etc.); however, such increase is not expected to be substantial in comparison to existing wastewater flows at the Recology facility. Moreover, none of the process options currently being considered for West Wing operations involve the use of water. While it is difficult to estimate the amount of water that would be used within the West Wing structure as part of its daily operations, the project sponsor estimates that number to be approximately 600 gallons of water. The wastewater treatment of this additional volume of water would not be considered substantial, nor would it be expected to exceed the capacity of the wastewater treatment provider serving the project site. Moreover, as is done for most development projects, the project sponsor would coordinate with SFPUC to ensure that the utility infrastructure (e.g., water and wastewater pipelines) is protected in place.

The project site currently consists mostly of pervious surfaces. The proposed building extension and the adjacent roadway would completely cover the project site; thus, project implementation may result in a marginal increase in impervious surfaces. Compliance with the City's Stormwater Management Ordinance (Ordinance No. 83-10) requires the proposed project reduce the existing volume and rate of stormwater runoff discharged from the project site. To achieve this, the proposed project would implement and install appropriate stormwater management systems that retain runoff onsite, promote stormwater reuse, and limit (or eliminate altogether) site discharges entering the combined sewer collection system. This, in turn, would limit the incremental

demand on both the collection system and wastewater facilities resulting from stormwater discharges, and minimize the potential for upsizing or constructing new facilities. Therefore, the proposed project would not substantially increase the demand for wastewater or stormwater treatment and would result in a less-than-significant impact.

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)

The project would likely require some additional water for cleaning within the proposed facility and may use water during construction to control fugitive dust as discussed in Section E.7, Air Quality. Water would be provided by the existing Recology facility water source, which is municipal water provided by the SFPUC. Water fixtures used in the proposed restroom facilities would comply with existing plumbing requirements, as required by law.

The demand for such water use would not be considered substantial, would be fully met by existing water supply capacity and would not require new or expanded water supply resources. As noted above, under Impact UT-1, the project sponsor would coordinate with SFPUC to ensure that the utility infrastructure (e.g., water and wastewater pipelines) is protected in place. Therefore, the proposed project's impacts 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 proposed project's solid waste disposal needs. (Less than Significant)

The majority of San Francisco's solid waste that is not recycled is disposed of in the Altamont Landfill. As of March 2013, San Francisco's remaining capacity at the landfill was 1,052,815 tons out of the original 15 million ton capacity.⁴¹ At current disposal rates, San Francisco's available landfill space under the existing contract will run out in January 2015. However, as of the year 2005 (latest year of record), the landfill has a closure date in 2025 and a remaining capacity of 74 percent.⁴² San Francisco Ordinance No. 27-06 requires a minimum of 65 percent of all construction and demolition debris to be recycled and diverted from landfills. San Francisco had a goal of 75 percent solid waste diversion by 2010 and has a goal of 100 percent solid waste diversion by 2020. San Francisco diverted 80 percent of their solid waste in the year 2010.⁴³

Recology is currently undergoing environmental review for a project that would result in an Agreement to authorize the transportation of the City's municipal solid waste from San Francisco to the existing Recology Hay Road Landfill located in unincorporated Solano County, at 6426 Hay Road, near State Route 113, southeast of Vacaville, where it would be disposed.⁴⁴ San Francisco and Recology would enter into an Agreement for the transportation and disposal of

41 DOE, "Zero Waste FAQ." Available online at: <http://www.sfenvironment.org/zero-waste/overview/zero-waste-faq>. Accessed August 1, 2013.

42 CalRecycle, "Active Landfills Profile for Altamont Landfill and Resource Recv'ry (01-AA-0009)." Available online at: <http://www.calrecycle.ca.gov/SWFacilities/Directory/01-AA-0009/Detail/>. Accessed August 1, 2013.

43 DOE, "Mayor Lee Announces San Francisco Reaches 80 Percent Landfill Waste Diversion, Leads All Cities in North America." Available online at: <http://www.sfenvironment.org/zero-waste/overview/goals>. Accessed August 1, 2013.

44 Planning Department Case No. 2014.0653E. Available online at: <http://www.sf-planning.org/index.aspx?page=1828>. Accessed May 7, 2015.

five million tons of San Francisco's municipal solid waste at the Recology Hay Road Landfill. The waste would be transported by long haul semi-trucks, primarily from 501 Tunnel Avenue, with several additional trucks hauling residual wastes for disposal from Recology's Recycle Central facility, located at Pier 96 in San Francisco, as is presently the case. At current rates of disposal, it is estimated that this Agreement would have a term of approximately 13 – 15 years. In addition, as discussed above, in the Land Use section (under Impact C-LU-1), Recology has commenced its Modernization and Expansion Project at the Tunnel Avenue facility (where the project site is located), which would modernize and expand existing facilities with the objective of achieving San Francisco's zero waste goal.

The proposed project would not generate additional waste through the proposed operations; rather it would serve as a testing facility for different combinations of equipment to extract additional useable resources from municipal solid waste, which otherwise is sent directly to landfill. As discussed above, under Project Description, all of the waste that would be processed inside the proposed building is from sources that are currently passing through the existing solid waste Transfer Station. The new building would allow the facility to take municipal solid waste that would otherwise go to landfill, process it, and transport it to off-site composting, anaerobic digestion, re-use, or recycling facilities. Hence, the proposed project would assist in City's efforts to reduce the solid waste disposal stream, although the project itself would not generate additional waste, as none would be created by project operations. Hence, the proposed project would not affect Altamont Landfill's capacity. Based on the above, the project site would have less-than-significant impact related to landfill capacity and solid waste facilities in general.

Impact UT-4: The construction and operation of the proposed project would follow all applicable statutes and regulations related to solid waste. (Less than Significant)

The California Integrated Waste Management Act of 1989 (AB 939) requires municipalities to adopt an Integrated Waste Management Plan (IWMP) to establish objectives, policies, and programs relative to waste disposal, management, source reduction, and recycling. Reports filed by the San Francisco Department of the Environment show that the City generated approximately 870,000 tons of waste material in 2000. By 2010, that figure decreased to approximately 455,000 tons. Waste diverted from landfills is defined as recycled or composted material. San Francisco has a goal of 75 percent landfill diversion by 2010, and 100 percent by 2020.⁴⁵ As of 2012, 80 percent of San Francisco's solid waste was being diverted from landfills, and the City had met the 2010 diversion target.⁴⁶ The proposed project would not alter or interfere with the City's efforts to comply with AB939 and its own landfill diversion goals or any other applicable statutes or regulations related to solid waste. Indeed, as discussed above, one of the basic objectives of the proposed project is to help the City reach its waste diversion goals. The proposed West Wing facility would not result in an inconsistency or violation of permit conditions to which the Recology facility is subject. Therefore, the proposed project would result in a less than significant impact with respect to compliance with all applicable statutes and regulations related to solid waste.

45 City and County of SFPDPH, Environmental Health Section. Available on the internet at www.sustainablesf.org/indicators/view/4. Accessed on August 1, 2013.

46 <http://www.sfenvironment.org/news/press-release/mayor-lee-announces-san-francisco-reaches-80-percent-landfill-waste-diversion-leads-all-cities-in-north-america>

Impact C-UT-1: The proposed project in combination with past, present, and reasonably foreseeable future projects in the vicinity, would result in less-than-significant cumulative impacts to utilities and service systems. (Less than Significant)

The EIR for the Visitacion Valley Redevelopment Program found that that its anticipated growth-inducing effects have the potential to result in a significant impact on utilities and service systems and that EIR found a potential impact due to a solid waste diversion. However, the proposed West Wing project would not substantially impact utility provision or services because, as discussed above, it would not generate substantial demand for additional utility provisions. Moreover, the proposed project has the potential to increase the City's waste diversion rate through the testing of different combinations of equipment to extract additional useable resources from municipal solid waste, which otherwise is sent directly to landfill. In this way, it would have no adverse effects on solid waste disposal. Based on the above, the proposed project would not contribute substantially to utilities and service systems cumulative effects and, for these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects (including the Recology Modernization and Expansion Project and the mixed-use project at 101 Leland Avenue), would not result in a cumulatively considerable utilities and service systems impact.

<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>
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?	☐	☐	☒	☐	☐

For a discussion of impacts to parks, refer to topics 9a, b, and c above.

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

The project site currently receives police protection services from the San Francisco Police Department. The nearest police station to the project site is the Bayview station, located at 201 Williams Street, approximately 2 miles to the north. Constructing an approximately 14,000-sf structure adjacent to the existing Transfer Station building as well as three retaining walls and pavement improvements next to the new building is unlikely to increase demand for police services in the area. Given the nature and scale of the proposed project, it would not necessitate

the construction of a new police station or alteration of an existing one in order to meet performance objectives. Impacts on police protection services would be less than significant.

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 project site currently receives fire protection services from the San Francisco Fire Department and, being on the county line, the North County Fire Authority in Brisbane. The nearest San Francisco fire station to the project site is Station #44, located at 1298 Girard Street, approximately one mile to the north of the project site. The proposed project could marginally increase the demand for fire protection service within the project area during construction and operation. The proposed construction would be subject to and would comply with the regulations of the California Fire Code, which establishes requirements pertaining to fire protection systems, including the provision of state-mandated fire alarms, fire extinguishers, appropriate building access and egress, and emergency response notification systems. Therefore, the proposed project would not necessitate the construction of a new fire station or physical alteration of an existing one in order to meet performance objectives. Impacts on fire protection services 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. (No Impact)

The proposed project does not include dwelling units, and would not add new population to the area. It would not have an impact on schools or generate new student enrollment. Thus, the proposed project would not result in any additional demand for school facilities and would not necessitate new or physically altered school facilities. Therefore, the proposed project would have no impact on schools.

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 does not include dwelling units, and would not result in a population increase. The project would not generate noticeable additional demand for government services, and would not necessitate new or physically altered government facilities. Therefore, the proposed project would have a less than significant impact on government facilities.

Impact C-PS-1: The proposed project in combination with past, present, and reasonably foreseeable future projects in the vicinity, would result in less-than-significant cumulative impacts to public services. (Less than Significant)

The proposed project could incrementally increase demand for public services, but not beyond levels anticipated and planned for by public service providers. Thus, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable public services impact.

<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>
13. BIOLOGICAL RESOURCES— Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐	☐
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?	☐	☐	☒	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☐	☒

The project site is not within or near an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, topic 13f is not applicable.

Impact BI-1: The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any special-status species. (Less than Significant)

The project site is not located near any riparian habitat, a sensitive natural community, federally protected wetlands or adopted conservation plan. There is no potential for the proposed project to adversely affect special-status species or sensitive natural communities, including wetlands.

Migrating birds do pass through San Francisco, but the project site does not contain habitat to support migrating birds. Nesting birds, their nests, and eggs are fully protected by Fish and Game Code (Sections 3503, 3503.5) and the federal Migratory Bird Treaty Act (MBTA). The proposed project would be subject to the MBTA, and would therefore have a less-than-significant impact on nesting birds. The project site contains an undeveloped, sparsely vegetated hillside

and surrounding flat paved areas. The project site is located adjacent to a sloped, vegetated buffer area; however, the project site itself is not part of that buffer and does not provide habitat for any rare or endangered plant or animal species. Accordingly, the implementation of the proposed project would not affect or diminish plant or animal habitats nor interfere with any resident or migratory species, or affect any rare, threatened or endangered species. In light of the above, the proposed project's impact on endangered species and their habitat would be less than significant.

BI-2: The proposed project would not conflict with the City's local tree ordinance. (Less than Significant)

The San Francisco Board of Supervisors adopted legislation that amended the City's Urban Forestry Ordinance, Public Works Code Section 801 et. Seq., to require a permit from DPW to remove any protected trees. If any activity is to occur within the dripline, prior to building permit issuance, a tree protection plan prepared by an International Society of Arborists-certified arborist is to be submitted to the Planning Department for review and approval. All permit applications that could potentially impact a protected tree must include a Planning Department "Required Checklist for Tree Planting and Protection." Protected trees include landmark trees, significant trees, or street trees located on private or public property anywhere within the territorial limits of the City and County of San Francisco. Article 16 of the San Francisco Public Works Code, the Urban Forestry Ordinance, provides for the protection of landmark, significant, and street trees. Landmark trees are designated by the Board of Supervisors upon the recommendation of the Urban Forestry Council, which determines whether a nominated tree meets the qualification for landmark designations by using established criteria (Section 810). Significant trees are those trees within the jurisdiction of the DPW or trees on private property within 10 feet of the public right-of-way that meet any of three size criteria. Significant trees must have a diameter at breast height in excess of 12 inches, or a height in excess of 20 feet, or a canopy in excess of 15 feet (Section 810(A)(a)). Street trees are any tree growing within the public right-of-way, including unimproved public streets and sidewalks, and any tree growing on land under the jurisdiction of the DPW (Section 802(w)). If a project would result in tree removal subject to the Urban Forestry Ordinance and the DPW would grant a permit, the DPW shall require that replacement trees be planted (at a one-to-one ratio) by the project sponsor or that an in-lieu fee be paid by the project sponsor (Section 806(b)). According to the project sponsor, no trees exist on the project site with the exception of a dead tree on the portion of the site that would contain the West Wing addition. This tree would be removed to accommodate the proposed project; however, this tree is not considered a protected tree based on the above criteria (it is not a landmark, significant, or street tree).

Planning Code Section 138.1 requires new construction, significant alterations, or relocation of building projects within any zoning district to include the planting of one 24-inch box tree for every 20 feet along the project site's street or alley frontage, with any remaining fraction of 10 feet or more requiring an additional tree. The trees must be planted in conformance with the City's recently adopted Better Streets Plan, including conformance with the street tree goals for a particular street type. Trees are not allowed above or within five feet of the outside diameter of wastewater assets or lateral vents. According to the Required Checklist for Tree Planting and Protection prepared by the project sponsor, the project site does not front on any public right-of-ways; however, the larger Recology Facility has two frontages – one on Tunnel Avenue and one

on Lathrop Avenue, both of which currently contain street trees planted at approximately 20-foot separations.⁴⁷ Given this, the project sponsor would not be required to plant additional trees as part of the proposed project pursuant to *Planning Code* Section 138.1, the *Better Streets Plan*, and in accordance with the MBTA.

For the reasons above, the proposed project would not conflict with the City's Urban Forestry Ordinance, and would not result in significant impacts related to tree protection.

Impact C-BI-1: The proposed project would result in no impact to biological resources; therefore, a discussion of cumulative impacts is not necessary. (Less than Significant)

As stated above, the proposed project would have a less than significant impact on biological resources; therefore, the proposed project would not contribute to any cumulative impacts related to biological resources and this impact would also be less-than-significant.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
14. GEOLOGY AND SOILS— 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.)	☐	☐	☒	☐	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐	☐
iv) Landslides?	☐	☐	☒	☐	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐	☐
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?	☐	☐	☒	☐	☐

⁴⁷ Greg Sheppard, *Required Checklist for Tree Planting and Protection*, 501 Tunnel Avenue, March 18, 2014. This document is available for review as part of Case File No. 2013.0850E at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, California 94103.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
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?	☐	☐	☐	☐	☒
f) Change substantially the topography or any unique geologic or physical features of the site?	☐	☐	☐	☒	☐

The proposed project would not use septic tanks or alternative wastewater disposal systems. Therefore, topic 13e is not applicable.

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

A geotechnical investigation was prepared for the proposed project.⁴⁸ The following discussion relies on the information provided in this report.

Two geotechnical borings to depths of 17 feet and 65 feet bgs were completed at the project site. In addition, three shallow test pits and one hand auger boring were also excavated to obtain soil overburden samples for geotechnical index and compaction testing. Lastly, a seismic refraction survey was conducted to characterize the subsurface geologic conditions beneath the site. Based on the results from the above tests and surveys, the project site is underlain by overburden soil, which consists of low to non-plastic silty sand, and which is underlain by bedrock. The upper 5 to 6 feet of bedrock is strongly weathered and intensely fractured sandstone. At about 8.6 feet below grade, black shale was encountered. The hillside west of the project site is also underlain by low plastic clayey sand and debris materials overlying bedrock. Based on testing, the thickness of the soil and debris at this location ranged from 1.2 to 10 feet. Groundwater level measurements were not performed at the project site; however, based on other data that was reviewed as part of the geotechnical investigation, measured groundwater level ranged from elevation 0 to 13 feet bgs.

The proposed project includes the construction of a new one-story, approximately 14,000-sf structure (West Wing) that would abut the existing Transfer Station on the west side, construction of three retaining walls to the west of the West Wing structure, and roadway improvements intended to vertically align the road with the West Wing structure's loading bay. The construction of the West Wing project would require excavation of surface soil and bedrock to an approximate elevation of 48 feet SF Datum (or approximately 14 feet as measured from the top of the hillside). The new structure would be supported on foundations that would consist of grade beams, drilled shafts, or micropiles founded on or in bedrock. The floor slab, which would support heavy equipment loads, would bear on either engineered fill or bedrock. The proposed retaining wall north of the West Wing building and the proposed retaining wall extending from

⁴⁸ ARUP North America Ltd., *Geotechnical Investigation and Design Parameters Report, Recology West Wing Project*, October 23, 2013. This document is available for review as part of Case File No. 2013.0850E at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, California 94103.

the southwest corner of the West Wing building near the truck loading tunnel would be cantilever-type walls, while the proposed retaining wall west of the Transfer Station roadway would consist of either a conventional cantilever-type wall or soldier pile/lagged wall.

The project site does not lie within an Alquist-Priolo Earthquake Fault Zone as defined by the California Division of Mines and Geology. No known active faults cross the project site. The closest mapped active fault in the vicinity of the project site is the San Andreas Fault, located approximately 5.6 miles west of the project site. This proximity would likely result in strong to very strong seismic ground shaking at the project site.

The project site does not lie within a liquefaction potential zone as mapped by the California Division of Mines and Geology for the City and County of San Francisco (seismic hazard zone).⁴⁹ Therefore, the potential for liquefaction is low. Most hillside sites throughout the San Francisco Bay Area are at some risk of ground displacements (i.e., landslides) during an earthquake. The project site is not located within an area of potential earthquake-induced landsliding, as mapped by California Division of Mines and Geology for the City and County of San Francisco.⁵⁰ Therefore, the potential for landslides to occur at the project site is low.

The geotechnical investigation provides recommendations for the project's seismic and geotechnical design parameters (for both the West Wing structure and the proposed retaining walls), which are found on pages 9 through 14 of that report. As discussed in the report, the West Wing building footing foundations should be founded on the bedrock using the design parameters presented in Section 7.2.1. Uplift loads from seismic and wind forces should be resisted by either drilled shafts or micropiles advanced into the bedrock. Overburden soils within the building footprint should be excavated to the bedrock and removed. Low-plastic overburden soils free of debris excavated from the site can be reused as engineered fill borrow if moisture conditioned and compacted. Also, recycled materials or rock excavation meeting the specifications for Caltrans Class 2 aggregate can be used to construct engineered fills. The ground topography within the building footprint would require engineered fill to be placed in the west portion of the building.

The west building wall of the West Wing would act as a retaining structure; therefore, a subdrain system should be installed above the foundation to collect wash down water that may infiltrate through the floor slab joints and/or cracks. The subdrain system should be drained to weep holes in the wall at the tunnel loadout area or to a central collection pit for testing and discharge. The building floor slab should be founded on at least 18 inches of compacted engineered fill. This will require overexcavation of the bedrock where it would be exposed at the floor slab subgrade. The minimum thickness of compact engineered fill is required to provide a uniform cushion for the concrete floor slab.

Regarding the proposed retaining walls, the geotechnical investigation states that retaining wall foundations should be founded on bedrock below overburden soils. The retaining walls located north and southwest of the West Wing building should be designed as conventional cantilever-type walls with an engineered backfill behind the wall. The retaining wall retaining the

⁴⁹ *San Francisco General Plan*, Community Safety Element, June 2012, Map 4.

⁵⁰ *Ibid.*

excavation into the hillside (sloping bedrock conditions) can be designed as either a conventional cantilever-type wall or soldier pile/lagged wall. A soldier pile/lagged retaining wall would limit the amount of rock excavation required. However, the soldier pile/lagged wall would require the use of tiebacks where the wall height exceeds 6 feet.

The proposed project would be subject to and required to comply with these or other recommendations, as determined by DBI through its building permit review process, into the final project's design. Therefore, the proposed project would not result in exposure of people and structures to potential substantial adverse effects from geology and impacts are considered less than significant.

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

The project site is located on a vacant vegetated hillside within a large developed industrial facility. While the proposed project would require grading and excavation of the existing overburden soils on the site, such loss of topsoil would be considered minor and would not result in substantial soil erosion. Construction of the proposed West Wing structure would require excavation of surface soil and bedrock to an approximate elevation of 48 feet SF Datum (or approximately 14 feet as measured from the top of the hillside). Site preparation and excavation activities would disturb soils, creating the potential for wind- and water-borne soil erosion; however, these activities would not result in substantial erosion because, as discussed in Section E.15, Hydrology and Water Quality, the construction contractor would be required to implement construction BMPs to prevent erosion and discharge of sediment into construction site stormwater runoff. Therefore, impacts related to soil erosion and loss of topsoil would be less than significant.

The three proposed retaining walls would further reduce the potential for any substantial soil erosion – the proposed retaining wall north of the West Wing building would retain earth fill required for truck and equipment access into the building; the proposed retaining wall extending from southwest corner of the West Wing building near the truck loading tunnel would retain earth fill required for the roadway apron improvements; and the proposed retaining wall west of the existing Transfer Station roadway would retain overburden soil and bedrock resulting from the required excavation into the hillside. Therefore, impacts related to soil erosion and loss of topsoil would be less than significant.

Impact GE-3: The proposed project could be located on expansive soil, but would not create substantial risks to life or property. (Less than Significant)

Expansive soils expand and contract in response to changes in soil moisture, most notably when near surface soils change from saturated to a low-moisture content condition, and back again. It is unlikely that expansive soils exist beneath the project site, since the soil tests conducted at the project site show that it is underlain by low to non-plastic silty sand and bedrock (i.e., no expansive clay was found). Regardless, the proposed project would be subject to and would be required to comply with requirements from DBI, through its building permit review process, that would include an analysis of the potential for soil expansion impacts. Through the DBI permit process, the proposed project would not create substantial risk to life or property from expansive soils and impacts would be less than significant.

Impact GE-4: The proposed project would not change substantially the topography or unique geologic or physical features of the site. (No Impact)

No unique geologic or physical features exist at the project site. No impact would occur.

Impact C-GE-1: The proposed project, in combination with the past, present, and reasonably foreseeable future projects in the site vicinity, would result in a less-than-significant cumulative impacts to geology and soils. (Less than Significant)

Geology impacts are generally localized and site specific and would not combine with other nearby projects to result in cumulative effects. Therefore, the proposed project and other reasonably foreseeable projects would not result in any cumulative geology and soils impacts. In addition, the building plans of proposed and foreseeable projects would be reviewed by SF DBI, and potential geologic hazards would be avoided during the SF DBI permit review process.

Therefore, cumulative impacts 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>
15. HYDROLOGY AND WATER QUALITY— Would the project:					
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐	☐
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)?	☐	☐	☒	☐	☐
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 of siltation on- or off-site?	☐	☐	☒	☐	☐
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?	☐	☐	☒	☐	☐
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?	☐	☐	☒	☐	☐

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐	☐
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?	☐	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☐	☐	☒
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?	☐	☐	☐	☐	☒
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☐	☒

The project site is not located within a 100-year Flood Hazard Boundary,⁵¹ a dam failure area,⁵² or a tsunami hazard area.⁵³ A seiche is an oscillation of a water body, such as a bay, which may cause local flooding. A seiche could occur in San Francisco Bay due to seismic or atmospheric activity. The project site is approximately 0.25 miles from San Francisco Bay and would not be subject to a seiche. No mudslide hazards exist at the project site because the project site is not located in the immediate vicinity of any landslide prone areas.⁵⁴ Therefore, topics 14g, h, i, and j are not applicable.

Impact HY-1: The proposed project would not violate water quality standards or waste discharge requirements, substantially degrade water quality, or provide substantial additional sources of polluted runoff. (Less than Significant)

Proposed project-related wastewater would flow to the City's combined stormwater and sewer system and would be treated to standards contained in the City's NPDES Permit for the Southeast Water Pollution Control Plant prior to discharge into San Francisco Bay. Because the NPDES standards are set and regulated by the San Francisco Bay Area RWQCB, the proposed project would not conflict with RWQCB requirements.

During the proposed project's construction, the potential for erosion and transportation of soil particles would exist. 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 Southeast Water Pollution Control Plant prior to discharge into the Bay. To minimize sediments and other pollutants from entering the combined sewer and stormwater

⁵¹ Federal Emergency Management Agency, "Draft Special Flood Hazard Areas (San Francisco)," September 21, 2007.

⁵² *San Francisco General Plan*, Community Safety Element, June 2012, Map 6.

⁵³ *Ibid*, Map 5.

⁵⁴ *Ibid*, Map 4.

system, an Erosion and Sediment Control Plan, including BMPs, would be required to be prepared by the project sponsor for the project to minimize stormwater runoff. In addition, as discussed in Section E.16 below, the proposed project would be subject to and required to comply with the Maher Ordinance, which has further site management and reporting requirements for potential hazardous soils.

The existing project site is a vacant, sloped area adjacent to the existing Transfer Station. Given the sloped nature of the site, it is likely that a certain amount of stormwater runoff already occurs there. The proposed building footprint would completely cover the project site and would, therefore, increase the amount of impervious surface on the project site. However, the City's Stormwater Management Ordinance (Ordinance No. 83-10) would require the proposed project to maintain, reduce, or eliminate the existing volume and rate of stormwater runoff discharged from the project site. To achieve this, the proposed project would implement and install appropriate stormwater management systems that retain runoff onsite, promote stormwater reuse, and limit (or eliminate altogether) site discharges entering the combined sewer collection system. This in turn would limit the incremental demand on both the collection system and wastewater facilities resulting from stormwater discharges, and minimize the need for upsizing or constructing new facilities. Therefore, due to the requirements of existing regulations, the proposed project would not violate water quality standards, substantially degrade water quality, or provide substantial additional sources of polluted runoff and thus, these impacts 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)

Although the project site is currently undeveloped and consists mostly of pervious surfaces, it is likely that the sloped nature of the site limits the amount of water infiltration that currently reaches the groundwater table. According to the geotechnical investigation, measured groundwater at the project vicinity ranges from elevation 0 to 13 feet SF Datum, based on previously collected data, and the study anticipates that groundwater is approximately 20 to 30 feet below ground level at the project site. Thus, the proposed project would not result in substantial depletion of groundwater and groundwater is not anticipated to be encountered during construction because excavation would be limited to approximately 14 feet bgs.

Although the project site is currently undeveloped and consists mostly of pervious surfaces, it is likely that the sloped nature of the site makes it likely to experience stormwater runoff due to the grade. The proposed project's construction would include excavation and grading of the rocky portion of the project site and covering it with a new structure, resulting in a net increase in impervious surfaces as compared to existing conditions. However, the amount of additional stormwater runoff that could result with project implementation would not be substantial, given the moderate size of the proposed addition and the fact that a large portion of the project site already experiences runoff due to its slope. Thus, while the proposed project could result in an increase in impervious areas, it would not be expected to substantially deplete groundwater supplies or interfere substantially with groundwater recharge.

Based on the above, the proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge and these impacts would be less-than-significant.

Impact HY-3: The proposed project would not result in altered drainage patterns that would cause substantial erosion or flooding or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. (Less than Significant)

No streams or rivers exist at the project site. Therefore, the proposed project would not alter the course of a stream or river or substantially alter the existing drainage pattern of the project site or area.

During the proposed project's construction phase, a potential for erosion and transportation of soil particles would exist, but as stated above in Impact HY-1, the proposed project would be subject to and would be required to comply with regulations that limit the amount of runoff from the project site.

As discussed above, under HY-2, although the project site is currently undeveloped and consists mostly of pervious surfaces, it is likely that the sloped nature of the site experiences substantial stormwater runoff due to the grade. The proposed project would excavate and grade the sloped portion of the project site and cover it with a new structure, resulting in a net increase in impervious surfaces as compared to existing conditions. However, as discussed above, the amount of additional stormwater runoff that could result with project implementation would not be considered significant, given the modest size of the proposed addition and the fact that a large portion of the project site already experiences runoff due to its sloped topography. Thus, while the proposed project could result in an increase in impervious areas and could also result in an increase in stormwater runoff, the anticipated amount of runoff would not be considered substantial.

The proposed building footprint would completely cover the project site and project implementation would result in a slight increase in impervious surfaces. However, due to the requirements of the existing regulations, the proposed project would not result in altered drainage patterns that would cause substantial erosion or flooding or contribute runoff which would exceed the capacity of existing or planned stormwater drainage systems and impacts would be less-than-significant.

Impact C-HY-1: The proposed project, in combination with the past, present, and reasonably foreseeable future projects in the site vicinity, would result in a less-than-significant cumulative impacts to hydrology and water quality. (Less than Significant)

Cumulative development in the project area could result in cumulative hydrological effects. The cumulative development projects would be required to comply with construction-phase stormwater pollution control and dewatering water quality regulations, if necessary, similar to the proposed project. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable hydrology and water quality impact.

<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>
16. HAZARDS AND HAZARDOUS MATERIALS— Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐	☐
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?	☐	☐	☐	☐	☒
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?	☐	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐	☐
h) Expose people or structures to a significant risk of loss, injury or death involving fires?	☐	☐	☒	☐	☐

The project site is not located within an airport land use plan area, or in the vicinity of a private airstrip. Therefore, topics 16e and f are not applicable.

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

The Recology facility is regulated by the San Francisco Hazardous Materials Unified Program Agency (HMUPA), an agency within the San Francisco Department of Public Health. The HMUPA is designated by the California Department of Toxic Substances Control (DTSC) as the local Certified Unified Program Agency (CUPA) which has the authority to regulate household hazardous waste facilities. CUPA consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of six

environmental and emergency response programs, including Hazardous Materials Release Response Plans and Inventories (Business Plans), California Accidental Release Prevention (CalARP) Program, Underground Storage Tank Program, Aboveground Petroleum Storage Act, Hazardous Waste Generator and Onsite Hazardous Waste Treatment (tiered permitting) Programs, and California Uniform Fire Code: Hazardous Material Management Plans and Hazardous Material Inventory Statements. The state agencies responsible for these programs set the standards for their program while local governments implement the standards. Recology facility's existing permit with HMUPA would be amended to cover any activities within the proposed West Wing structure, which would be similar to those currently conducted at the adjacent Transfer Station.

For the reasons above, hazardous materials used at the proposed West Wing facility would not pose any substantial public health or safety hazards related to hazardous materials. Thus, the proposed project would result in less-than-significant impacts related to the routine transport, use, or disposal of hazardous materials.

Impact HZ-2: The proposed project would not create a potentially significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, including within one-quarter mile of a school. (Less than Significant)

There are no schools within on-quarter mile of the project site. The proposed project would include excavation to a depth of approximately 14 feet bgs and would require the removal and disposal of approximately 3,000 cubic yards of soil. The project site contains an existing solid waste processing facility and off-haul operations within the adjacent Transfer Station. The Recology facility (areas including and surrounding the project site) has been used for waste disposal, sorting, processing and off-haul activities since prior to 1987.

A Site History Report was prepared for the proposed project by Weiss Associates and the main findings of this report are summarized below.⁵⁵ The report notes two sites of potential concern: the project site at 501 Tunnel Avenue and the former Schlage Lock facility site, located to the west of the project site at 2401 Bayshore Boulevard. The database review performed as part of the Site History Report includes references to two closed leaking underground storage tank (LUST) cases: one closed by the San Francisco Department of Environmental Health, Local Oversight Program in 2001 and one closed by the San Mateo County Department of Environmental Health Local Oversight Program in 2006. The project site (presumably the larger Recology facility) is also listed as a closed landfill site and includes open listings for the following: underground storage tank (UST), aboveground storage tank (AST), materials recycling/recovery, solid waste collection, bulking, transfer facility, conditionally exempt small quantity hazardous waste generator and household hazardous waste collection, and an above-ground tank fueling system with underground piping.

The project site is not listed on the United States Environmental Protection Agency's (USEPA's) National Priorities List or as a hazardous substance release site by the California Department of

⁵⁵ Weiss Associates, *Site History Report for Recology San Francisco West Wing Project, 501 Tunnel Avenue, San Francisco, California*, November 2014. This document is available for review as part of Case File No. 2013.0850E at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, California 94103.

Toxic Substances (DTSC). It is listed as a closed LUST site and closed landfill by the State Water Resources Control Board (SWRCB) and CalRecycle (San Mateo County).⁵⁶

The Schlage Lock property, located to the west of the Site across Tunnel Avenue, is an DTSC cleanup site with soil and groundwater contamination primarily with trichloroethene (TCE). Remediation for this property included soil removal, soil vapor extraction, and enhanced reductive dechlorination. Most of this site appears to be in the post-remediation operations and maintenance phase with ongoing groundwater monitoring (as discussed above, it is the proposed site for the Visitacion Valley Redevelopment Program). Land use covenants for portions of this site were approved by DTSC, Berkeley Regional Office, in June 2014 per information on the DTSC Envirostor website.

Based on the information reviewed for this SHR, it is possible that hazardous substances may be present in soil and/or groundwater at the project site. Weiss recommends soil sampling in the proposed construction area to meet Maher Ordinance requirements.⁵⁷ Groundwater sampling is not being recommended at this time since the anticipated depth to groundwater is 20 or more feet below the lowest planned construction elevation; thus, it is considered unlikely that groundwater would be encountered during construction.

Subsequent to the publication of the Site History Report, the project applicant entered into the Maher program overseen by the DPH.⁵⁸ In accordance with requirements set forth by the Maher Program, the project sponsor retained Weiss Associates to prepare a Work Plan for Soil Investigation (Work Plan). The Work Plan describes soil sampling proposed in accordance with the Maher Ordinance.

The proposed project would be required to remediate potential soil contamination described above in accordance with the Maher Ordinance. Thus, the proposed project would not result in a significant hazard to the public or environment from contaminated soil and the proposed project would result in a less than significant impact. As part of compliance with the Maher Ordinance, DPH will continue to work with the project sponsor to assess and, if needed, remediate the project site to meet the needs of the proposed uses and minimize the potential for the site's workers and nearby residents to be exposed to hazardous materials. As part of that effort, DPH would also ensure that project construction does not result in the exposure of workers and the public to subsurface contaminants. This would be accomplished through specific construction-phase requirements that would be included in the Site Mitigation Plan, which would also be subject to DPH approval.

56 The terms "open" and "closed" in reference to LUST and landfill sites denote, in the case of "open" sites, that the site is either operational or is undergoing clean-up and remediation efforts and, in the case of a "closed" sites, that the site is no longer operational and/or has completed remediation.

57 The Maher Ordinance, which is codified in San Francisco Health Code Article 22, requires San Francisco Department of Public Health (DPH) oversight for the characterization and mitigation of hazardous substances in soil and groundwater in designated areas zoned for industrial uses, sites with industrial uses or underground storage tanks, sites with historic bay fill, and sites in close proximity to freeways or underground storage tanks.

58 Martita Lee Weden, Senior Environmental Health Inspector, SFDPH, email to Tania Sheyner, Planning Department, January 29, 2015. This document is available for review as part of Case File No. 2013.0850E at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, California 94103.

The project site is an undeveloped vegetated hill area surrounded by gradual slopes and contains no buildings (the Transfer Station abuts the project site to the east). Therefore, no other hazardous materials (e.g., mold, lead-based paint) would be anticipated during construction.

Based on the above, the proposed project's impact related to creating a hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be less than significant.

Impact HZ-3: The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. (Less than Significant)

As noted above (under Impact HZ-2), the project site is not listed on the United States Environmental Protection Agency's (USEPA's) National Priorities List or as a hazardous substance release site by the California Department of Toxic Substances (DTSC). It is listed as a closed LUST site and closed landfill by the State Water Resources Control Board (SWRCB) and CalRecycle (San Mateo County).

Regardless, as discussed above, given the possibility that hazardous substances may be present in soil and/or groundwater at the project site, the project applicant has entered into the Maher Program and is coordinating with SFDPH regarding soil sampling and potential remediation activities that may be required to accommodate the proposed project. Based on the above, impacts related to the project site's listing on a hazardous materials database would be less than significant.

Impact HZ-4: The proposed project would not expose people or structures to a significant risk of loss, injury or death involving fires, nor interfere with the implementation of an emergency response plan. (Less than Significant)

San Francisco ensures fire safety primarily through provisions of the *Building* and the *Fire Codes*. In addition, the San Francisco Fire Department, as well as DBI, reviews the final building plans to ensure conformance with these provisions. In addition, the proposed project is not located within a fire hazard severity zone.⁵⁹ The proposed project would conform to these standards, which (depending on building type) may also include development of an emergency procedure manual and an exit drill plan. Therefore, potential emergency response and fire hazard impacts of the proposed project would be less-than-significant.

Impact C-HZ-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would result in less-than-significant impacts related to hazards and hazardous materials. (Less than Significant)

Impacts from hazards are generally site-specific, and typically do not result in cumulative impacts provided applicable safety and remediation requirements are followed at each site. Any hazards at nearby sites would be subject to the same safety or remediation requirements discussed for the proposed project above, which would reduce any hazard effects to less-than-significant levels. Compliance with laws and regulations relating to soil and groundwater contaminants would preclude the project's interaction with other projects in a manner that could result in significant cumulative impacts related to hazardous materials. The proposed project

⁵⁹ California Department of Forestry and Fire Protection (CalFire), "Draft Fire Hazard Severity Areas in LRA, San Francisco (Map)," updated November 2008.

would not have a significant impact on hazardous material conditions on the project site or vicinity. No other project developments exist in the project vicinity that would contribute considerably to cumulative effects. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable hazards and hazardous materials impact.

<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>
17. MINERAL AND ENERGY RESOURCES— 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?	☐	☐	☐	☐	☒
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?	☐	☐	☐	☐	☒
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	☐	☐	☒	☐	☐

All land in San Francisco, including the project site, is designated Mineral Resource Zone 4 (MRZ-4) by the California Division of Mines and Geology (CDMG) under the Surface Mining and Reclamation Act of 1975.⁶⁰ This designation indicates that there is inadequate information available for assignment to any other MRZ and thus the project site is not designated area of significant mineral deposits. No operational mineral resource recovery sites exist in the project area whose operations or accessibility would be affected by the proposed project. Therefore, significance criteria 16(a) and (b) are not applicable to the proposed project.

Impact ME-1: Implementation of the proposed project would not encourage activities which would result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner. (Less than Significant)

The proposed project would include the construction of a new one-story, approximately 14,000-sf structure abutting the existing Transfer Station building to accommodate future waste processing activities and equipment as well as three retaining walls and roadway improvements. Demolition and construction activities would require electricity to operate air compressors, hand tools, mobile project offices, and lighting. Construction vehicles and equipment would primarily use diesel fuel, and construction workers would use gasoline and diesel to commute. The construction activities would not result in demand for electricity or fuels greater than that for other modestly scaled projects in the region. Given this, the construction-related energy use

⁶⁰ California Division of Mines and Geology, Open File Report 96-03 and Special Report 146 Parts 1 and II)

associated with the proposed project would not be large or wasteful. Therefore, the construction-related impacts on fuel, water, or energy would be less than significant.

The operation of the proposed building would not result in the use of large amounts of fuel, water, or energy. The proposed project would use energy produced in regional power plants and generation sources using hydropower and natural gas, wind, solar, geothermal, coal, and nuclear fuels and would not use substantial quantities of other nonrenewable natural resources. While the proposed project would increase demand for energy, the project-generated demand would be negligible in the context of the overall consumer demand in San Francisco and the state. Therefore, the operation of the proposed building would not result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner and impacts are considered less-than-significant.

Impact C-ME-1: The proposed project, in combination with the past, present, and reasonably foreseeable future projects in the site vicinity, would result in less-than-significant cumulative impacts to energy and minerals. (Less than Significant)

No known minerals exist at the project site and thus, the proposed project would not contribute to any cumulative impact on mineral resources. The project-generated demand for electricity would be negligible in the context of overall demand within San Francisco, the greater Bay Area, and the State, and would not in and of itself require any expansion of power facilities. The City plans to reduce GHG emissions to 25 percent below 1990 levels by the year 2017 and ultimately reduce GHG emission to 80 percent below 1990 levels by 2050 which would be achieved through a number of different strategies, including energy efficiency. Therefore, the energy demand associated with the proposed project would not substantially contribute to a cumulative impact on existing or proposed energy supplies or resources. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable mineral and energy resources impact.

<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>
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?	☐	☐	☐	☒	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒	☐

<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>
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)?	☐	☐	☐	☒	☐
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒	☐
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use?	☐	☐	☐	☒	☐

Impact AF-1: The proposed project would not result in the conversion of farmland or forest land to non-farm or non-forest use, nor would it conflict with existing agricultural or forest use or zoning. (No Impact)

The project site is a vacant sloped site within the boundaries of the Recology complex, surrounded by an urbanized area of San Francisco. The California Department of Conservation's Farmland Mapping and Monitoring Program identify the site as "Urban and Built-up Land".⁶¹ Because the project site does not contain agricultural uses and is not zoned for such uses, the proposed project would not convert any prime farmland, or Farmland of Statewide Importance to non-agricultural use, and it would not conflict with existing zoning for agricultural land use or a Williamson Act contract, nor would it involve any changes to the environment that could result in the conversion of farmland. Additionally, the proposed project would not convert any forest land or timberland to non-forest use. Forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits" (Public Resources Code § 12220(g)). Timberland is defined as "land, other than land owned by the federal government and land designated by the board (State Board of Forestry and Fire Protection) as experimental forest land, which is available for, and capable of, growing a crop of trees of any commercial species uses to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis after consultation with the district committees and others" (Government Code § 51104(g)). Therefore, significance criteria 18(a), (b), (c), (d), and (e) are not applicable to the proposed project.

⁶¹ California Department of Conservation, "Bay Area Region Important Farmland 2004 and Urbanization 1984 – 2004 (Map)," March 2007.

<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>
19. MANDATORY FINDINGS OF SIGNIFICANCE— 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?	☐	☒	☐	☐	☐
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.)	☐	☐	☒	☐	☐
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐	☐

As described in Section E.4, Cultural Resources, the proposed project could result in a substantial adverse change to an archeological resource. In addition, the proposed project could result in damage to, or destruction of, as yet-unknown unique paleontological resource. Implementation of Mitigation Measures M-CP-2 and M-CP-3 would reduce these impacts to less-than-significant levels and therefore, the proposed project would not result in a significant impact through the elimination of important examples of major periods of California history or prehistory. In addition, the proposed project would involve construction in an Air Pollution Exposure Zone, an area that already experiences poor air quality and this could result in a potentially significant air quality impact. However, implementation of Mitigation Measure M-AQ-2 would ensure that construction emissions impacts to nearby sensitive receptors are reduced to a less-than-significant level.

Both long-term and short-term environmental effects, including substantial adverse effects on human beings, associated with the proposed project would be less than significant, as discussed under each environmental topic. Each environmental topic area includes an analysis of cumulative impacts based on land use projects, compliance with adopted plans, statutes, and ordinances, and currently proposed projects.

F. MITIGATION MEASURES AND IMPROVEMENT MEASURES

The following mitigation measures have been identified to reduce potentially significant environmental impacts resulting from the proposed project to less-than-significant levels. Implementation of these mitigation measures has been agreed upon by the project sponsor.⁶²

Mitigation Measure M-CP-2: Accidental Discovery

The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in *CEQA Guidelines* Section 15064.5(a)(c). The project sponsor shall distribute the Planning Department archeological resource "ALERT" sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, pile driving, etc. firms); or utilities firm involved in soils disturbing activities within the project site. Prior to any soils disturbing activities being undertaken each contractor is responsible for ensuring that the "ALERT" sheet is circulated to all field personnel including, machine operators, field crew, pile drivers, supervisory personnel, etc. The project sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) to the ERO confirming that all field personnel have received copies of the Alert Sheet.

Should any indication of an archeological resource be encountered during any soils disturbing activity of the project, the project Head Foreman and/or project sponsor shall immediately notify the ERO and shall immediately suspend any soils disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures should be undertaken.

If the ERO determines that an archeological resource may be present within the project site, the project sponsor shall retain the services of an archaeological consultant from the pool of qualified archaeological consultants maintained by the Planning Department archaeologist. The archeological consultant shall advise the ERO as to whether the discovery is an archeological resource, retains sufficient integrity, and is of potential scientific/historical/cultural significance. If an archeological resource is present, the archeological consultant shall identify and evaluate the archeological resource. The archeological consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by the project sponsor.

Measures might include: preservation in situ of the archeological resource; an archaeological monitoring program; or an archeological testing program. If an archeological monitoring program or archeological testing program is required, it shall be consistent with the Environmental Planning (EP) division guidelines for such

⁶² *Agreement to Implement Mitigation and Improvement Measures, 501 Tunnel Avenue Project*, Case No. 2013.0850E, May 26, 2015. This document is on file and available for public review at the San Francisco Planning Department, as part of Case File 2013.0850E.

programs. The ERO may also require that the project sponsor immediately implement a site security program if the archeological resource is at risk from vandalism, looting, or other damaging actions.

The project archeological consultant shall submit a Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describing the archeological and historical research methods employed in the archeological 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.

Copies of the Draft FARR shall be sent to the ERO for review and approval. 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 copy, one unbound copy and one unlocked, searchable PDF copy on CD three copies 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 or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.

Mitigation Measure M-CP-3 - Paleontological Training Program and Alert Sheet

To reduce the potential for the proposed project to result in a significant impact on paleontological resources, the SFRPD shall arrange for a paleontological training by a qualified paleontologist regarding the potential for such resources to exist in the project site and how to identify such resources. The training shall also include a review of penalties for looting and disturbance of these resources. An alert sheet shall be issued and shall include the following:

1. A discussion of the potential to encounter paleontological resources;
2. Instructions for reporting observed looting of a paleontological resource; and instruct that if a paleontological deposit is encountered within a project area, all soil-disturbing activities in the vicinity of the deposit shall cease and the ERO shall be notified immediately.
3. If an unanticipated paleontological resource is encountered during project activities, all project activities shall stop, and a professional paleontologist shall be hired to assess the potential paleontological resource and its significance. The findings shall be presented to the ERO, who shall determine the additional steps to be taken before work in the vicinity of the deposit is authorized to continue.

Mitigation Measure M-AQ-2: Construction Emissions Minimization

- A. *Construction Emissions Minimization Plan.* Prior to issuance of a construction permit, the project sponsor should 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 should 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 should meet the following requirements:
 - a) Where access to alternative sources of power are available, portable diesel engines should be prohibited;
 - b) All off-road equipment should 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).⁶³
 - 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 should 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).

⁶³ 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 should provide the next cleanest piece of off-road equipment as provided by the step down schedules in Table A.

Table A – 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 should 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 should 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 should require that construction operators properly maintain and tune equipment in accordance with manufacturer specifications.
 4. The Plan should 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 should indicate the type of alternative fuel being used.
 5. The Plan should be kept on-site and available for review by any persons requesting it and a legible sign should 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 should provide copies of Plan to members of the public as requested.
- B. *Reporting.* Quarterly reports should 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 should include the actual amount of alternative fuel used.

Within six months of the completion of construction activities, the project sponsor should submit to the ERO a final report summarizing construction activities. The final report

should indicate the start and end dates and duration of each construction phase. For each phase, the report should include detailed information required in A(4). In addition, for off-road equipment using alternative fuels, reporting should 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.
-

G. PUBLIC NOTICE AND COMMENT

A "Notification of Project Receiving Environmental Review" was mailed on October 24, 2014, to owners of properties within 300 feet of the project site, adjacent occupants, and neighborhood groups. Comments regarding physical environmental effects were related to: (1) odor emanating from the Recology facility, especially when the wind blows north toward the residential uses in the Little Hollywood neighborhood, and (2) nighttime operational noise, including noise from bird-dispersing noise makers, seagulls, trucks backing up, and containers getting dropped. In addition, one individual commenter regarding an existing vermin problem (presumably as a result of existing operations at the Recology facility) and another individual did not provide a comment but requested that the published Initial Study/Mitigated Negative Declaration be distributed to him. To the extent these comments relate to the physical environmental effects of the proposed project, they have been addressed in Section E, Evaluation of Environmental Effects under the following topics: comment (1) under Topic 7, Air Quality, and comment (2) under Topic 6, Noise.

H. COMMENTS RECEIVED IN RESPONSE TO THE PMND

A "Notice of Availability of and Intent to Adopt a Mitigated Negative Declaration" was mailed on May 27, 2015 to owners of properties within 300 feet of the project site, adjacent occupants, neighborhood groups, and other interested parties. Three comment letters were received and are addressed below.

Two comment letters were submitted by Anthony Verreos, representing Little Hollywood Improvement Committee. Because most comments presented in these two letters either overlap in content or are repeated in both letters, they are addressed together in the responses below.

Comment 1:

Multiple comments expressed concerns with respect to existing environmental conditions of Recology operations on the adjacent Little Hollywood neighborhood and the commenter requested that they be quantified and described. For instance, in both comment letters, the commenter requested that existing current exposures or impacts (with respect to, for example, noise, air quality, pests, etc.) be quantified and discussed.

Pursuant to Section 15125 of the CEQA Guidelines, “the EIR is required to include a description of the physical environmental conditions in the vicinity of the project from both a local and regional perspective, as it exists at the time the NOP is published or, if no NOP is published, at the time the environmental analysis is commenced. The environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.” While the environmental document prepared for the proposed project is a Mitigated Negative Declaration and not an EIR (thus, no NOP was published), the baseline for determining environmental effects of the proposed project are nevertheless the physical environmental conditions at the time analysis commenced, which is roughly mid-2014. While this MND hereby acknowledges comments made on what is characterized by the commenter as unacceptable conditions with respect to existing noise, air pollution, and bird and rodent issues, since they are part of the existing conditions, they are part of the baseline and are not considered to be impacts associated with the proposed project itself, nor are required to be characterized as environmental impacts. In addition, other “past and current impacts” on the Little Hollywood neighborhood that were noted in one of the comment letters from Little Hollywood Improvement Committee are: “No effort to improve and beautify the neighborhood’s two main streets: Tunnel Avenue, and Blanken Avenue over fifty years,” “Failure to control tire puncture debris on Tunnel Ave.,” and “Failure to demand [San Francisco Police Department] equally enforce the law prohibiting the idling of diesel engines longer than two minutes on our residential streets.” These comments are noted; however, as noted above, no further discussion or analysis is required since they are part of the existing conditions (e.g., environmental baseline), as noted above. With respect to the last point regarding enforcement of existing laws, please see Comment 2 below.

Comment 2:

Comments were made on the effectiveness of current regulations, as enforced by the Planning Department and other City agencies (Department of Public Health, SFPD, etc.) to address existing environmental conditions associated with Recology operations (such as noise, air quality, bird and rodent issues, etc.).

Established procedures for dealing with noise issues are discussed on pages 32 and 33 of the Initial Study, while established procedures for dealing with odor complains are discussed on pages 48 and 29 of the Initial Study. (CEQA does not require analysis of bird and rodent issues as discussed in the context of comment letters.) These procedures, which were developed specifically to track and address these types of potential environmental impacts, are considered sufficient under most circumstances for ensuring that impacts associated with operational noise and air quality are less than significant. While the commenter maintains that existing regulations are not sufficient for addressing these existing issues, these comments are with regard to the existing conditions and not the proposed project; thus, no additional analysis is required.

Comment 3:

A comment was made that the proposed project, due to its size, exceeds the 10,000 square foot maximum that can be exempted under CEQA regulations.

By analyzing the proposed project in a Mitigated Negative Declaration, the Planning Department did not exempt it from environmental review.

Comment 4:

Multiple comments and an attachment to one of the comment letters contained multiple comments on Recology's Modernization and Expansion project.

This project is being analyzed in a separate Environmental Impact Report (EIR) and is not part of the proposed project that was studied in this MND. As discussed on page 15 of the Initial Study, the City of Brisbane, serving as the lead agency for purposes of CEQA review, issued an NOP for the preparation of an EIR for the Recology Modernization and Expansion Project on April 14, 2015. While the MND discussed and analyzed Recology's proposed Modernization and Expansion Project in the cumulative context, as necessary, these comments do not require further responses as they do not pertain to the proposed project, which is the subject of this MND.

Comment 5:

A comment asserted that a 300-foot noticing requirement (presumably for the Notice of Availability of and Intent to Adopt a Mitigated Negative Declaration that was distributed on May 27, 2015) is insufficient and that the NOA/NOI should have been more widely distributed.

This comment is noted; however, the distribution of the NOA/NOI complied with all applicable requirements, including CEQA, the CEQA Guidelines and Chapter 31 of the San Francisco Administrative Code. No further response is required.

A comment letter was submitted by the California Environmental Protection Agency Department of Resources Recycling and Recovery (CalRecycle).

Comment 6:

A comment notes that, in addition to project approvals listed on page 9 of the Initial Study, the project would also likely require, at minimum, an amendment to the Transfer Processing Report to the existing San Francisco Solid Waste Transfer and Recycling Facility Solid Waste Facility Permit, as well as other additional requirements as determined by San Francisco DPH, which acts as the designated Local Enforcement Agency on behalf of the Department of Resources Recycling and Recovery (CalRecycle).

Consistent with this comment, language was added to page 9 of the Initial Study to reflect the above approval action.

Comment 7:

A comment requested additional details of the nature of the new processes and equipment necessary to determine potential impacts of the project. Specifically, the commenter inquired, "Will most of the incoming material be mixed with refuse, or will it be source separated when it enters the TS [transfer station]? How will the tonnages and traffic numbers be accounted for in mixed loads?"

As discussed in the Project Description on page 8 of the Initial Study, and elaborated upon by the project sponsor in an email,⁶⁴ the proposed facility would be an extension of the existing transfer station, which is permitted for mixed loads and source separated loads such as organics. As such, the proposed West Wing facility would be expected to receive both mixed and source-separated wastes for characterization and processing at different times. All of the mixed or source-separated wastes processed in the West Wing would be diverted from existing waste streams already being received at the transfer station or organics annex, so the West Wing operations would not affect the amount of waste received at the facility. They may affect the relative amounts of wastes leaving the facility to landfill, recycling markets, compost, and digestion, but not the total amount. Traffic and tonnage in and out of the facility would be accounted for through Recology's scale system, as under existing conditions.

⁶⁴ Email from Brad Drda, Recology, to Tania Sheyner, San Francisco Planning Department, June 24, 2015. This document is available for review as part of Case File No. 2013.0850E at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, California 94103.

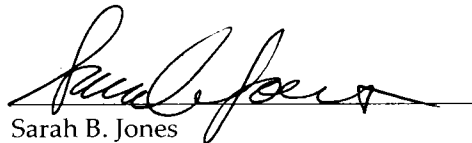
H.I DETERMINATION

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 16, 2015



Sarah B. Jones
Environmental Review Officer
for
John Rahaim
Director of Planning

I.J INITIAL STUDY PREPARERS

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