SAN FRANCISCO
PLANNING DEPARTMENT

Addendum to Environmental Impact Report

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Addendum Date:	January 28, 2014
Case No.:	**86.638E**
Project Title:	SFO Airport Hotel
Zoning/Plan Area:	San Francisco International Airport Master Plan, Commercial Hotel Use
Block/Lot:	San Francisco International Airport Master Plan "Plot 2"
Lot Size:	4.7 acres (portion of "Plot 2")
Project Sponsor:	San Francisco International Airport
Contact:	Audrey Park, Senior Environmental Planner – (650) 821-7844 Audrey.Park@flysfo.com
Staff Contact:	Steven H. Smith – (415) 558-6373 Steve.Smith@sfgov.org

REMARKS

The project sponsor, San Francisco International Airport (SFO or the Airport), has submitted to the San Francisco Planning Department Environmental Planning Division (SFEP), an updated project description and related materials for the proposed on-Airport hotel development. On-Airport hotel development was approved by the San Francisco Airport Commission (Airport Commission) as part of the San Francisco Airport International Airport Master Plan (Master Plan) and assessed in the Master Plan Final Environmental Impact Report (FEIR). The Master Plan encompasses landside modifications and Airport expansion projects. Since adoption of the Master Plan, the on-Airport hotel development as envisioned in the Master Plan has been modified, as described in greater detail below. SFEP has reviewed the currently proposed on-Airport hotel development, which would include construction of a new 403-room hotel and AirTrain Station, to determine whether additional environmental documentation must be prepared. For purposes of this Addendum, the Master Plan, with revisions addressed in prior addenda to the Master Plan FEIR plus the currently proposed hotel project, is hereafter referred to as the "modified project." As demonstrated in this Addendum, SFEP has determined that the modified project is within the scope of the FEIR prepared for the Master Plan and certified by the San Francisco Planning Commission, and no additional environmental review is required.

Background

A FEIR was prepared for the San Francisco International Airport Master Plan and was certified by the San Francisco Planning Commission (Planning Commission) on May 28, 1992. The Airport Commission approved the Master Plan and accompanying Final Mitigation Monitoring and Reporting Program (MMRP) and conditions of approval on November 3, 1992.

The Master Plan focused on the accommodation of passenger and cargo growth at the Airport through the development of improved facilities and circulation patterns for all Airport-owned lands (excluding the undeveloped area west of U.S. Highway 101 (U.S. 101), which is referred to as the West of Bayshore Airport Commission Lands).[1] The major Master Plan improvements included in the FEIR analyses were:

1. The new International Terminal and associated Boarding Areas A and G, completed in 2000;
2. Consolidation of cargo facilities in the North and West Field areas, which is ongoing. (Construction of one cargo building in the West Field area started in 2013 and will be complete by end of 2014. The remaining buildings in the West Field area are on hold. In the North Field area, one cargo building was constructed in 2000; the cargo maintenance and aircraft parking facility are on hold; no design has been completed for the proposed cargo maintenance area);
3. An Automated People Mover System ("AirTrain"), the first phase of which was completed in 2003;
4. Roadway and vehicle circulation improvements to the International Terminal Building, completed in 2000;
5. On Airport hotel development, which is the subject of this Addendum, currently proposed for construction beginning in 2015;
6. Renovation of the former International Terminal (Terminal 2) for domestic operations, completed in 2011;
7. Replacement of the South Terminal (Terminal 1), Boarding Area B, planned for construction beginning in 2016 and renovation of Boarding Area C, planned for construction in 2018; and
8. New administration/office facilities, currently proposed for construction beginning in 2017.

Since certification of the FEIR, revisions to certain individual Master Plan projects have been addressed through addenda. SFEP determined that these individual projects were within the envelope of the Master Plan FEIR, no new significant impacts would result, and no new mitigation measures were required beyond those adopted as part of the MMRP for the Master Plan FEIR. **Attachment A** provides descriptions of past Master Plan FEIR addenda adopted by SFEP.

As described in the Master Plan FEIR (p.53) and summarized below, the Airport Commission previously proposed the on-Airport hotel development in two phases:

- Phase I near-term build out (1996) included construction of a new 100,000 square foot hotel (in conjunction with an administration/office space at levels four through eight) within the International Terminal; and
- Phase II long-term build out (2006) included renovation of the previously-existing 220,000 square foot Hilton Hotel (the hotel was demolished in 1999).

[1] The "West of Bayshore" property is a 180-acre site owned by the Airport. Development of the West of Bayshore property was excluded from the Master Plan and subsequent analysis in the FEIR to maintain the site as a major utility right of way for Pacific Gas & Electric (PG&E), Bay Area Rapid Transit (BART), SFO, and the San Francisco Public Utilities Commission (SFPUC). (Master Plan FEIR, Volume III, Initial Study).

Figure 1 shows the current hotel project site relative to the regional and Airport setting, as described under Proposed Project Modifications section of this Addendum. **Figure 2** depicts the locations of the two planned phases of hotel development on the Airport, as presented in the Master Plan FEIR. Neither phase of the hotel development has been implemented.

As discussed in the Master Plan FEIR, the Airport envisioned the redevelopment and renovation of the 527-room, full-service Hilton Hotel previously located on a site known as "Plot 2." Plot 2 is located immediately east of U.S. 101 and southwest of International Terminal A, at the intersection of South McDonnell Road and South Link Road. In 1998, the Airport Commission[2] approved reimbursement to Hilton Hotels for early termination of the existing hotel land lease to avoid adverse impacts to construction of the Master Plan projects – specifically, the elevated terminal roadway system. The Hilton Hotel was subsequently demolished in 1999 to construct the terminal roadway. In 1999, the Airport Commission adopted a resolution[3] to initiate Design/Build of a replacement hotel on Plot 2. However, air traffic at SFO declined substantially in the early 2000's and hotel reconstruction was postponed. Since completion of the terminal roadway system, the Plot 2 site has been undeveloped and, until 2012, used as a construction lay down/trailer parking area for Airport projects. In 2012, about 9.3 acres of the 11-acre Plot 2 site were converted from a construction lay down area to a temporary tenant employee parking lot.[4] The remaining 1.7 acres are currently used by the Airport's landscaping and information technology departments for greenhouses and a City and County of San Francisco (CCSF) information technology data center, respectively. **Figure 3** provides photographs of the existing land uses on Plot 2.

PROPOSED REVISIONS TO THE PROJECT

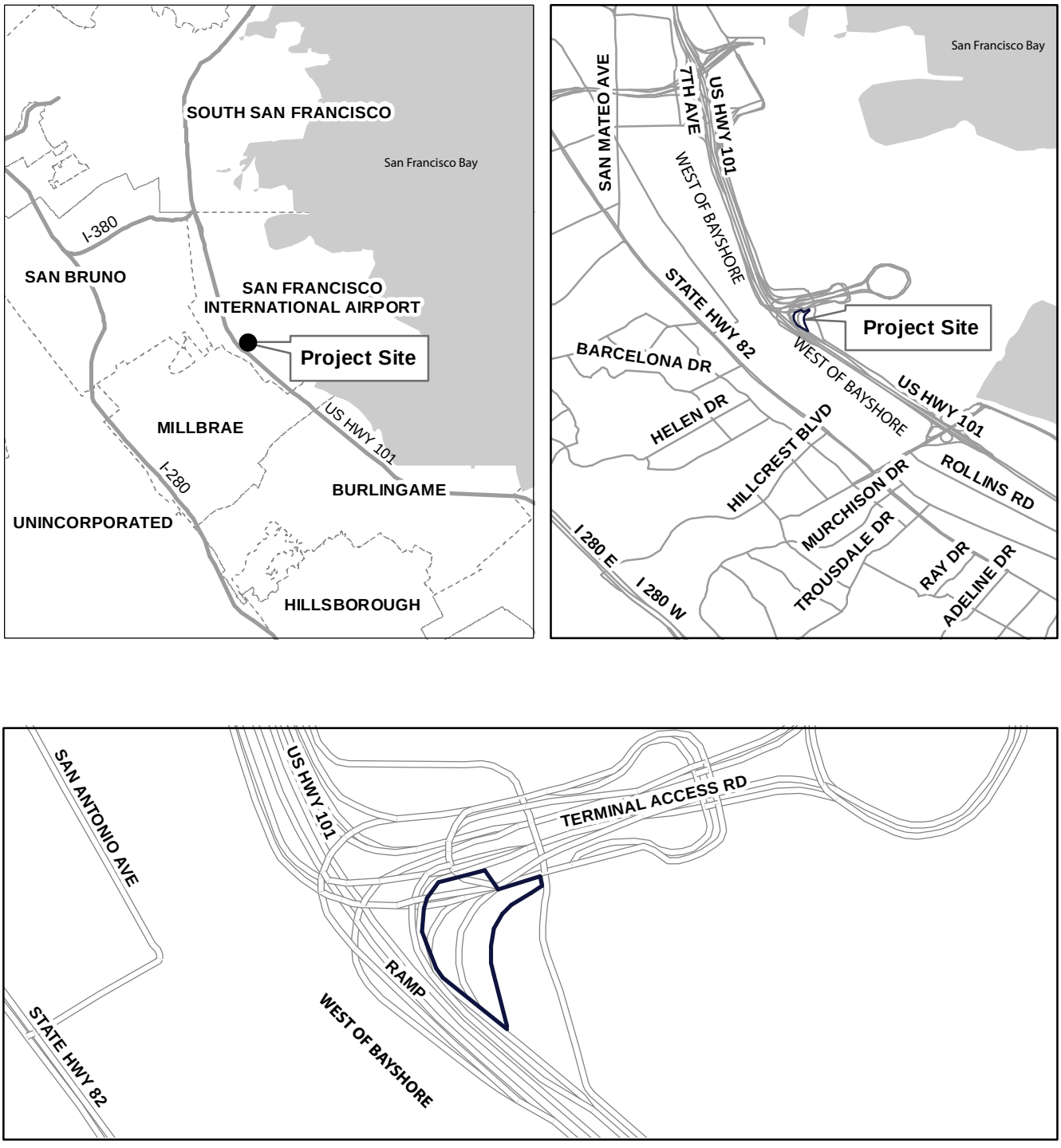
Since the adoption and certification of the Master Plan FEIR, the plans for on-Airport hotel development have been modified. Instead of two separate hotel developments (at the International Terminal and on Plot 2) as proposed and analyzed in the Master Plan FEIR, there would instead be one on-Airport hotel development with a connected platform to a new AirTrain station on Plot 2 (herein referred to as the "modified hotel project"). As detailed in **Table 1**, the modified hotel project is anticipated to provide facilities/amenities that are comparable to a full-service luxury hotel. The facility spacing requirements listed below are based on a market demand and feasibility study commissioned by the Airport. The Airport anticipates that the modified hotel project would be financed, constructed, and owned by the Airport, but the hotel would be managed, operated, and maintained by a qualified hotel operator. The final dimensions and amenities would be subject to detailed design input from the selected hotel operator's brand-specific amenities.

---

[2] San Francisco Airport Commission Resolution No. 98-005 adopted on January 13, 1998 for early relinquishment of Hilton Hotels & Resorts Lease No. PUC 17910.

[3] San Francisco Airport Commission Resolution No. 99-0148 adopted on May 18, 1999 to utilize design/build approach for a replacement hotel on Plot 2.

[4] SF Planning Department – Environmental Planning Case No. 2012.0687E, Class 11 Categorical Exemption, May 2012.



Note:
The West of Bayshore area is owned and managed by the City and County of San Francisco through the Airport Commission.

SOURCE: ESA Airports

Figure 1
Regional Setting
SFO Airport Hotel
January 2014

Case No. 86.638E

LEGEND

Master Plan Hotel Phases:

MP1 Master Plan Phase 1: New Hotel at IT

MP2 Master Plan Phase 2: Renovate Hilton Hotel

Existing Facilities:

IT-G International Terminal Garage G and BART Station

IT-A International Terminal Garage A

Project Site Boundary

Note:
The West of Bayshore area is owned and managed by the City and County of San Francisco through the Airport Commission.

Drawing Not to Scale.

SOURCE SFO Master Plan Final Environmental Impact Report, 1992

Figure 2
Modified Hotel Project Site
SFO Airport Hotel
January 2014

Case No. 86.638E

Photo 3A: Landscaping Department Greenhouse (Looking North)

Photo 3B: Airport Employee Parking Lot (Looking South)

Photo 3C: Airport Data Center (Looking East)

Photo 3D: Airport Employee Parking Lot Entrance (Looking Southeast)

SOURCE SFO Bureau of Planning and Environmental Affairs, 2013.

Figure 3
Existing Site Photographs
SFO Airport Hotel
January 2014

Case No. 86.638E

The hotel, regardless of the selected operator, would be designed and constructed by the Airport to LEED Gold standards.[5]

TABLE 1
MODIFIED HOTEL PROJECT –
LIST OF FACILITIES, AMENITIES, AND DIMENSIONS

Modified Hotel Project Facility	Description	Total Area (sq.ft.)
Guest Rooms	403 guest rooms, including 19 suites	152,000[a]
Meeting Space	Includes ballrooms, banquet and meeting rooms	25,900
Food and Beverage	Restaurants, lounge (day/night use) and support areas (e.g., restrooms)	14,600
Fitness Center	Guest use only	4,500
Other Amenities	Business center	750
Other Amenities	Lobby area and service space	37,525
Back of House	Main kitchen, receiving areas, and engineering in basement	14,327
	Total Modified Hotel Area	**249,602**
AirTrain Station[b]	New AirTrain Station and Hotel Connector on 3rd Floor	14,100
Surface parking	Surface parking lot and driveway to hotel	156,500
Hotel Footprint	Hotel footprint and driveway	47,500
	Total Plot 2 Site Area	**204,000**

NOTES:

sq.ft. = square feet

[a] Average of 377 square feet per room.

[b] AirTrain is the Airport's electric automated people mover system.

SOURCES: Modified hotel project facilities and total areas: Jones Land LaSalle Hotels, Market Demand & Feasibility Study for Proposed San Francisco International Airport Hotel, September 25, 2012; AirTrain and surface parking areas: SFO Bureau of Planning and Environmental Affairs, 2013.

As detailed in **Table 2**, the modified project would have a hotel with 403 rooms and 250,000 total square feet, as compared to the 766 rooms and 320,000 total square feet of hotel uses, as analyzed in the Master Plan FEIR. Moreover, the modified hotel project would be built entirely on a portion of Plot 2, while the Master Plan FEIR analyzed the impacts of a new 100,000 square foot hotel in the upper levels of the International Terminal and a complete renovation of the then existing 220,000-square foot Hilton Hotel on Plot 2. Specifically, the modified hotel project would be developed on about 4.7 acres of the total 11-acre Plot 2 site, which is about 6.3 acres less than the Hilton Hotel redevelopment originally planned under the Master Plan. Of the 4.7 acres, about 1.1 acres of the Plot 2 site currently accommodates greenhouses; this area would be paved with asphalt and the existing greenhouses would be relocated. The modified hotel project site would be re-graded such that storm water on the entire site would drain to a main pipeline, located underground and immediately east of South McDonnell Road.

[5] Chapter 13C of the San Francisco Building Code, effective January 1, 2011. Available online: *http://www.amlegal.com/nxt/gateway.dll/California/sfbuilding/buildingcode2010edition/chapter13cgreenbuildingrequirements?f=templates$fn=default.htm$3.0$vid=amlegal:sanfrancisco_ca* This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

TABLE 2
SUMMARY OF MODIFIED HOTEL PROJECT COMPARED TO THE MASTER PLAN FEIR

		Hotel Projects under the Master Plan FEIR	
	Modified Hotel Project	**Phase I: Construction of New Hotel within the International Terminal**	**Phase II: Renovation of Hilton Hotel**
Hotel area (sq ft)	250,000	100,000	220,000
Hotel rooms (count)	403	240[a]	527
Height (ft)	144[b]	NA[c]	43[b,d]
Hotel floors (count)	13	1[e]	2
Parking spaces (count)	296	NA[f]	338[g]

NOTES:

sq.ft. = square feet

[a] Estimated 240 rooms based on assumption that 10% of total square footage at International Terminal hotel would be reserved for basic amenities; using an average area of 377 sq ft per guest room (where modified hotel project = 152,000 sq ft for rooms / 403 rooms = 377 sq ft average), the International Terminal Hotel would accommodate about 240 rooms in a 90,000 square foot area.

[b] Height of hotel includes the roof parapet.

[c] Not applicable because the proposed hotel development would have occurred within the existing envelope of the new International Terminal.

[d] Estimated, based on historical photograph.

[e] The hotel at the International Terminal was planned to be one level (out of four levels) built in conjunction with other Master Plan projects within the International Terminal, such as administrative/office space.

[f] Not applicable. There was no designated guest parking facility proposed as part of the hotel at the International Terminal.

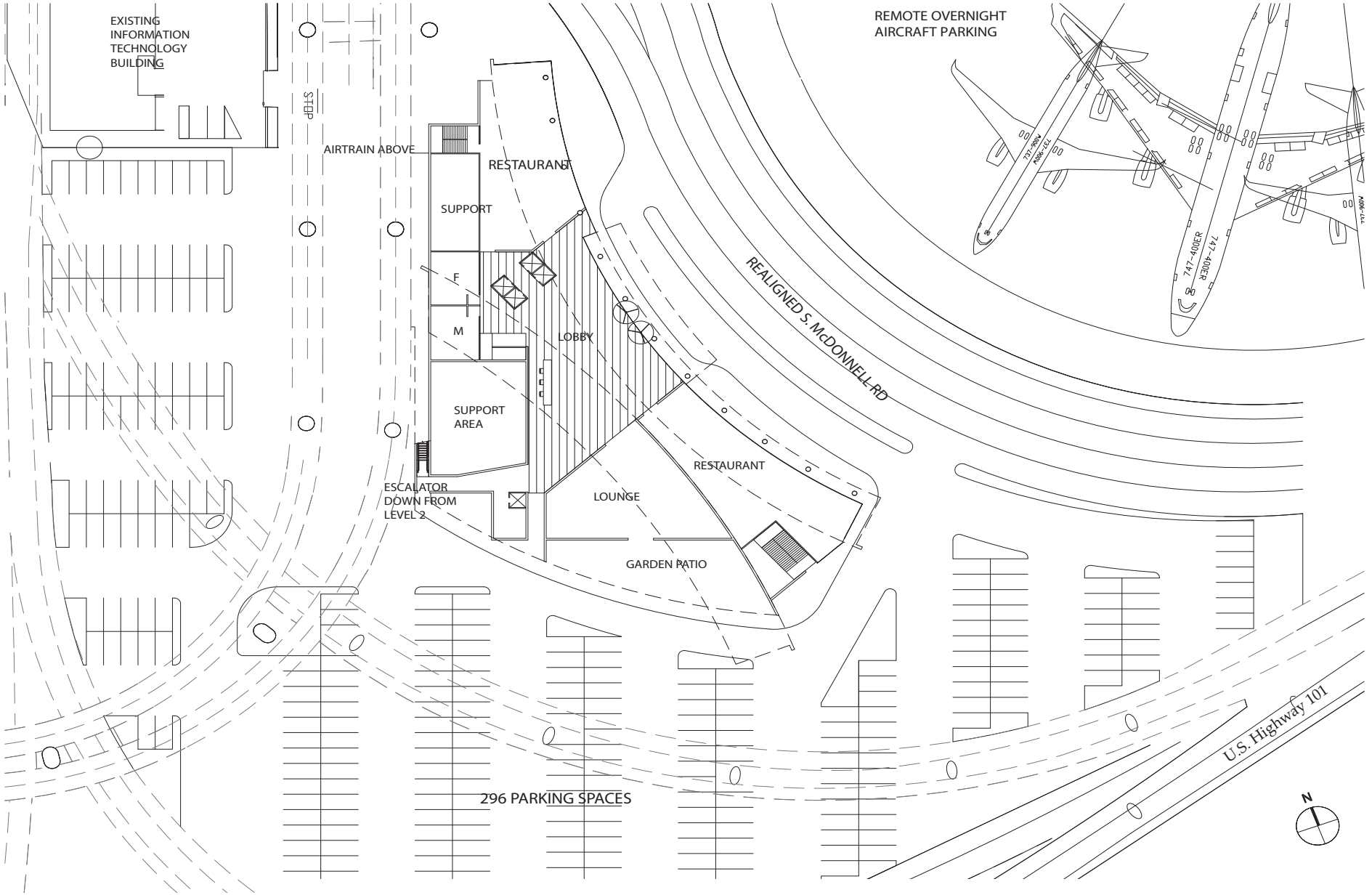
[g] Estimated, based on visual count of aerial from historic photograph (SFO Museum Photo 2011.032.0740; 1969). This estimate does not include surface vehicle parking spaces designated for the conference center located on the Hilton Hotel plot (which had an estimated 230 designated surface vehicle parking spaces).

SOURCES: Modified hotel project facilities and total areas: Jones Land LaSalle Hotels, Market Demand & Feasibility Study for Proposed San Francisco International Airport Hotel, September 25, 2012; SFO Master Plan FEIR, 1992; and Hilton hotel parking spaces and dimensions: SFO Bureau of Planning and Environmental Affairs, based on historical photographs.

Figure 4 shows the proposed site and **Figure 5** shows a conceptual massing of the modified hotel with a new AirTrain station. There would be 13 above-ground floors plus a roof parapet and a basement for back of the house/kitchen facilities. The ground and second floors would provide lobby/amenities for hotel guests; floor three would include a pedestrian link to the AirTrain station and escalator/elevator link to the ground and second floors. The remaining floors 4 – 13 would be for guest rooms and suites. The total above-ground height of the hotel, including the roof parapet, is expected to be approximately 144 feet tall (which is approximately the same height as the nearby International Terminal garages). The modified hotel project would be about 100 feet taller compared to the then existing Hilton Hotel.

The third floor of the hotel would include a connector platform to provide guests with a direct pedestrian link to a new AirTrain station (total of about 14,100 square feet). The AirTrain at SFO is an automated people mover system consisting of a dual fixed guide way alignment with trains moving in both directions. The AirTrain system was constructed as a Master Plan project and was fully operational by March 2003,[6] providing a terminal loop (clockwise) and rental car center loop (counterclockwise) for passengers. There would be no change to the

[6] San Francisco International Airport, *AirTrain Fact Sheet*, July 2003. Available online: *http://media.flysfo.com/AirTrain_Fact_Sheet.pdf*. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

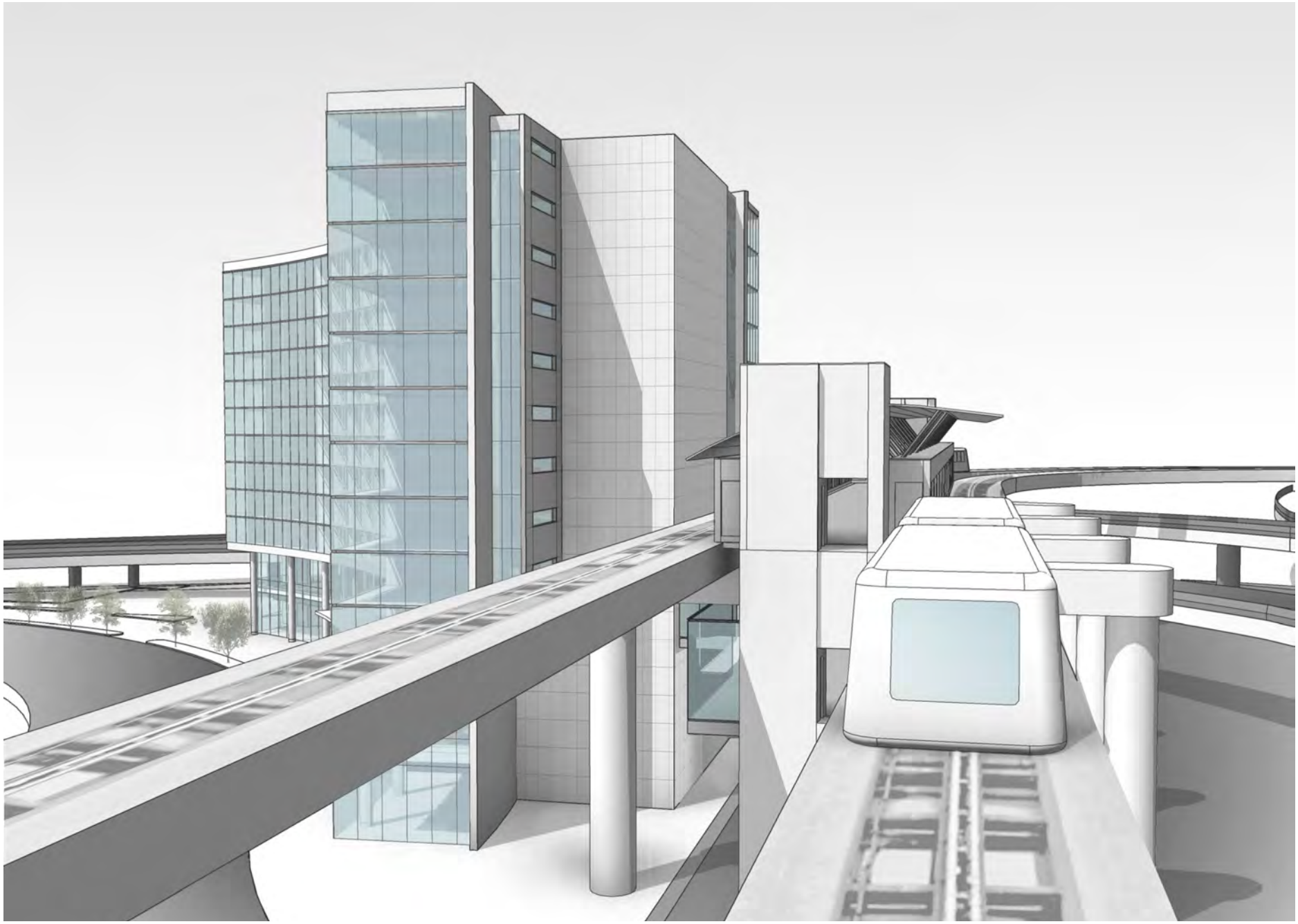


Drawing Not to Scale.

SOURCE HNTB Corporation

Figure 4
Modified Hotel Project Site Plan
SFO Airport Hotel
January 2014

Case No. 86.638E



SOURCE: HNTB Corporation

Figure 5
Hotel Massing with AirTrain Station
SFO Airport Hotel
January 2014

Case No. 86.638E

existing tracks or elevation as a result of the modified hotel project, including the new AirTrain station serving the hotel. The Airport Commission would design, construct, and maintain the AirTrain station as part of the overall AirTrain system. The SFO Shuttle Bus would also provide hotel guests and staff with a direct link to ground transportation options, including Bay Area Rapid Transit (BART), taxis/limos, shared vans, two parking garages at the International Terminal complex, long term parking garage/lot, and rental car facilities.

Approximately 296 parking spaces would be provided for hotel guests in a surface lot adjacent to the hotel, which is about 40 parking spaces less compared to the then existing Hilton Hotel. Additional parking for hotel visitors would be provided at the International Terminal A and G (IT-A and IT-G) garages with direct access to the hotel via AirTrain stations at the IT-A and IT-G garages. Hotel employees who drive would park at designated employee parking lots. The Airport would maintain the existing SFO Shuttle Bus route that connects the existing Airport employee parking lot to the terminal area and AirTrain. Hotel guests originating from the San Francisco Bay Area would be able to take BART directly to the Airport and then transfer to the AirTrain (located immediately above the BART station) to get to the hotel. In addition, hotel guests and staff could walk approximately five minutes between Plot 2 and the terminal area along an existing elevated pedestrian walkway on South Link Road.

Green Building Features

Chapter 13C of the San Francisco Building Code – the "Green Building Ordinance" – combines the 2010 California Green Building Standards Code with stricter local requirements. The ordinance is applicable to new residential and commercial buildings, as well as renovations to existing buildings. Compliance with the Green Building Ordinance is met via submittal for certification under the LEED standards or GreenPoint Rated Standards, including documentation showing that a proposed project will meet the appropriate standards.

As described on p. 3 of this Addendum, the Airport Commission would design and construct the modified hotel project to achieve the LEED Gold standard. The Green Building Code specifically requires that new commercial projects achieving LEED Gold compliance requirements must demonstrate that they exceed the California Building Energy Efficiency Standards by at least 15 percent, as well as either generate on-site renewable energy or achieve an additional 10 percent exceedance of California Building Energy Efficiency Standards. Regarding water use reduction, projects must show how they reduce potable water use by 30 percent overall, and quantify ("submeter") water use in spaces anticipated to generate demand of more than 1,000 gallons per day. The modified hotel project would meet these requirements and the Airport Commission would provide supporting documentation in accordance with the Green Building Ordinance.

Under the Green Building Ordinance's provisions for transportation, project sponsors must provide bike parking meeting requirements of Planning Code Section 155. The modified hotel project would be consistent with Planning Code Section 155.1. The number of Class 1 and 2 bicycle spaces would be in accordance with the numbers set forth in the Planning Code and would be installed during the construction phase of the modified hotel project. In addition, the Airport would designate eight percent of the proposed 296 parking stalls for low-emitting vehicles, according to LEED Gold requirements.

The modified hotel project would also meet interior environmental quality requirements of the Green Building Ordinance and LEED Gold standards. For example, the modified hotel project would comply with the City's Environment Code regarding enhanced refrigerant management. Further, per CalGreen, the modified hotel project would avoid CFCs in the HVAC and refrigerating equipment. An indoor air quality management plan would be prepared, incorporating the use of MERV-8 air filters. In addition, pursuant to LEED IA 3.1 requirements, the modified hotel project would be consistent with Chapter 7 of the SF Environment Code by achieving LEED credits EQ 4.1, 4.2, 4.3, and 4.4 for design and construction of new buildings, including submittal of documentation for verification of compliance. Finally, the modified hotel project would provide acoustical controls with sound class transmission ratings stipulated by the Green Building Ordinance.

Approvals and Permits

Discussed below are the permits or approvals that would be required from federal, state, and local agencies to implement the modified hotel project as described in this Addendum, but may be subject to minor modifications with the final design. Under the doctrine of intergovernmental immunity in California when the CCSF through its Airport Commission proposes construction on its property located outside of San Francisco and within another jurisdiction, the Airport Commission is not subject to that jurisdiction's building or zoning laws and ordinances.[7]

Federal Approvals and Permits

- **Federal Aviation Administration (FAA), Approval of Airport Layout Plan (ALP) and environmental processing under the National Environmental Policy Act (NEPA).** As a federally obligated public use airport, SFO must obtain approval of the ALP with the modified hotel project and environmental processing under NEPA per FAA Order 1050.1E, *Environmental Impacts: Policies and Procedures.*[8] Both the ALP approval and NEPA review would be processed at the local FAA San Francisco Airport District Office. The FAA will review the height of the modified hotel project, including the hotel and AirTrain station components, when it conducts an airport airspace analysis during the ALP approval process.

State Approvals and Permit

- **San Francisco Bay Regional Water Quality Control Board (RWRCB), Clean Water Act Section 402 Permit.** The Mel Leong Treatment Plant (MLTP) operates under a National Pollutant Discharge Elimination System (NPDES) Permit Number CA0038318, Regional Water Quality Control Board (RWQCB) Number R2-2013-0011. In compliance with the Clean Water Act, the RWQCB may require a Rainfall Erosivity Waiver or a Section 402 permit since construction of the modified hotel project would disturb more than one acre. This would require filing the Permit Registration Documents that include a Notice of Intent, and preparing a storm water pollution prevention plan (SWPPP) as part of a Construction General Permit.

---

7 California Government Code Sections 53090-53091.

8 Federal Aviation Administration, Order 1050.1E, *Environmental Impacts: Policies and Procedures*, March 2006. Available online: *http://www.faa.gov/documentLibrary/media/order/energy_orders/1050-1E.pdf*. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

Local Approvals and Permits

- **San Francisco Airport Commission and San Francisco Board of Supervisors, Adoption of CEQA Findings.** Adoption of CEQA findings.
- **San Francisco Airport Commission and San Francisco Board of Supervisors, Creation of special purpose entity (SPE).** Approval to create a SPE, a non-profit corporation, that would lease the hotel project site and be responsible for the construction of the hotel on behalf of and at the direction of the Airport Commission. The Airport Commission, sitting ex officio, would act as the Board of Directors of the SPE, thereby keeping the SPE under the control of the Airport Commission at all times. The Airport will own and control the hotel through the SPE.
- **San Francisco Airport Commission and San Francisco Board of Supervisors, Issuance of Special Facility Bonds (SFBs) and General Airport Revenue Bonds (GARBs).** Approval of issuance by the Airport Commission of SFBs and GARBs to finance the hotel and AirTrain station prior to issuance and sale of these bonds.
- **San Francisco Airport Commission and San Francisco Board of Supervisors, Lease and other agreements. The Airport anticipates entering into a lease and other agreements longer than 10 years.** Approval of the lease and other agreements, per Section 9.118 of the City Charter.
- **San Francisco Airport Commission (sitting as SPE Board of Directors), Hotel Operator Approval.** Approval of the issuance of the hotel operator Request for Proposals (RFP) and award of a management contract to the competitively selected hotel operator.
- **San Francisco Airport Commission (sitting as SPE Board of Directors), Hotel Construction.** Approval of issuance of the RFP and award of contracts to the competitively selected Project Management/Construction Management team and hotel Design/Construction team.
- **San Francisco Airport Commission, AirTrain Station Construction.** Approval of issuance of the RFP and award of contracts to the competitively selected Project Management/Construction Management team and AirTrain Station Design/Construction team.
- **San Francisco Board of Supervisors.** Approval for Management/Construction Management and Design contracts may be required if the contract amount exceeds $10 million dollars.
- **San Francisco Arts Commission, Civic Design Review Committee.** Approval of exterior design of structures on City property.
- **SFO Building Inspection and Code Enforcement (BICE), Building Permit.** Issuance of permit. All plans, specifications, calculations, and methods of construction shall meet the code requirements found in the California Uniform Building Code and SFO standards in accordance with the Tenant Improvement Guide (TIG).[9] The TIG stipulates all proposed design be reviewed by SFO's Design Review Committee, Design and Construction division, and BICE division.
- **San Francisco Bay Area Air Quality Management District (BAAQMD) Authority to Construct and/or Permit to Operate an Emergency Standby Generator – Diesel Engine.** Issuance of permit for stationary sources of air emissions, specifically emergency standby generators.

ANALYSIS OF POTENTIAL ENVIRONMENTAL EFFECTS

The Master Plan FEIR evaluated the Master Plan which includes a number of near-term and long-term projects. California Environmental Quality Act (CEQA) Guidelines Section 15168 requires that activities covered in a

9 The Tenant Improvement Guide (TIG) is applicable to all tenants and airport facilities.

program EIR be examined in light of the program EIR to determine whether additional environmental documentation must be prepared. In addition, San Francisco Administrative Code Section 31.19(c)(1) states that a modified project must be reevaluated and that "If, on the basis of such reevaluation, the Environmental Review Officer determines, based on the requirements of CEQA, that no additional environmental review is necessary, this determination and the reasons therefore shall be noted in writing in the case record, and no further evaluation shall be required by this Chapter." CEQA Guidelines Section 15164 provides for the use of an addendum to document the basis for a lead agency's decision not to require a Subsequent or Supplemental EIR for a project that is already adequately covered in an existing certified EIR. The lead agency's decision to use an addendum must be supported by substantial evidence that the conditions that would trigger the preparation of a Subsequent EIR, as provided in CEQA Guidelines Section 15162, are not present. This Addendum documents the assessment and determination that the modified project is within the scope of the FEIR and no additional environmental review is required.

The Master Plan FEIR was certified by the Planning Commission on May 29, 1992. The Airport Commission approved the Master Plan and accompanying MMRP and conditions of approval on November 3, 1992. The FEIR analyzed impacts of the Master Plan in the areas of Land Use and Plans, Transportation, Noise, Air Quality, Energy, Cultural Resources, Geology and Seismicity, Hazardous Materials, Employment and Housing, Utilities, Public Services, Aviation Safety, and Growth Inducement. In addition, the Master Plan Initial Study (FEIR Volume III, Appendix A) previously analyzed impacts in the areas of Visual Quality, Population, Climate, Biology, Water, and Energy/Resources.

Since certification of the Master Plan FEIR, no changes have occurred in the circumstances under which the original plan alternatives or the plan as currently proposed that would change the severity of the plan's physical impacts, and no new information has emerged that would materially change the analyses or conclusions set forth in the FEIR. While the current context of cumulative developments has changed from that analyzed in the FEIR, this revised cumulative context would not result in a change in the conclusions set forth in the FEIR regarding the potential for cumulative effects. **Table 3** presents an updated list of past projects that have been constructed, projects currently under construction, and reasonably foreseeable future projects that have been approved but not yet constructed. Each of these projects is at or in the vicinity of SFO and could combine with the modified project activities, including the modified hotel project, to result in cumulative environmental effects. The modified project could have the potential to result in a cumulatively considerable contribution to a significant cumulative impact if it would create new significant impacts or result in a substantial increase in the significance of a previously identified significant impact. However, the proposed revisions associated with the new hotel and AirTrain station at Plot 2 would not result in any new or substantially more severe significant impacts beyond those identified in the FEIR, and no new mitigation measures be required. The following discussion and analysis provides the basis for this conclusion.

Topics Dismissed from Further Analysis in Master Plan FEIR Initial Study

The Master Plan FEIR did not analyze impacts to Aesthetics, Biological Resources, or Wind and Shadow; instead these topics were addressed in the FEIR Initial Study (FEIR Volume III, Appendix A). Aesthetics and Biological Resource impacts were determined to be less than significant in the FEIR Initial Study. Wind and Shadow

impacts, which were categorized as "Air Quality/Climate" impacts at the time, were also determined to be less than significant in the FEIR Initial Study. Given the urbanized and built-out nature of the Airport, there are no Agricultural or Forest resources present, and this topic, which was not addressed in the FEIR, is not applicable to the modified project, including the modified hotel project.

The FEIR Initial Study (FEIR Volume III, p. A.6) determined the Master Plan would not generate aesthetic or visual impacts because the Airport is separated from nearby residential uses by U.S. 101, the West of Bayshore Airport Commission Lands, and the Caltrain right-of-way. The modified hotel project would be developed adjacent to the IT-A garage within the existing Airport, which does not contain natural features that contribute to a scenic public setting. Scenic views and vistas would not be obscured, and the manmade visual character of the Airport would not be substantially degraded as a result of the modified hotel project. New lighting would not be excessive in the context of the existing night lighting generated by existing terminal buildings, runways, airplanes, and approach roads, as well as U.S. 101 and other uses in the urbanized area surrounding the Airport. The distance between the modified hotel project site and the closest residential areas (approximately 600 feet to the west across U.S. 101) combined with the intervening highway would act to dissipate obtrusive light or glare. Therefore, the modified project, including the modified hotel project, would not result in any new or substantially greater visual, light and glare, or aesthetic effects beyond those identified in the FEIR Initial Study.

The FEIR Initial Study (FEIR Volume III, pp. A.9-A.10) determined the Master Plan would not significantly impact biological resources in the nearby West of Bayshore Airport Commission Lands because this area was excluded from development of Master Plan projects (Master Plan FEIR, Volume III, p. A.9). There are no occurrences of special status species at the modified hotel project site.[10,11] San Francisco Garter Snake (*Thamnophis sirtalis tetrataenia)* habitat is identified in the West of Bayshore Airport Commission Lands, about 600 feet west of the modified hotel project site; however, the modified hotel project would have no impact on this area due to the distance and the intervening U.S. 101 structure. SFO's runway and Bay shoreline areas support annual grasslands between runways, taxiways, and aircraft aprons areas where grasses, bird species, and rodent populations are present; infield areas support species similar to those found in annual grasslands; and tidal mudflats support benthic invertebrates and provide foraging habitat for shorebird species.[12] Open water adjacent to the Airport provides shallow bay habitats for marine fish, shark and ray species, waterbirds, ducks, and gulls. Construction and operation of the modified hotel project would not interfere with these vegetative cover and habitat areas or affect resident or migratory species or rare, threatened, or endangered species because the majority of the site is already paved or developed with Airport-related uses. Therefore, the modified project, including the modified hotel project, would not result in any new or substantially greater impacts to biological resources beyond those identified in the FEIR Initial Study.

---

[10] California Natural Diversity Database Quick Viewer. Available online at: *http://www.dfg.ca.gov/biogeodata/cnddb/mapsanddata.asp* accessed August 29, 2013. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

[11] US Fish and Wildlife Service. Critical Habitat Portal. Available online at: *http://criticalhabitat.fws.gov/crithab/* accessed August 30, 2013. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

[12] San Francisco Planning Department, *San Francisco International Airport Runway Safety Area Program Mitigated Negative Declaration, Case No. 2010.0755E*, July 20, 2011. Available online at: *http://sfmea.sfplanning.org/2010.0755E_FMND.pdf* This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

TABLE 3
PAST, PRESENT, AND REASONABLY FORSEEABLE FUTURE PROJECTS

Count	Location	Project Name and Description	Anticipated Construction
1	101 Oyster Point Blvd, about 2.5 miles north of SFO property	**Britannia Cove at Oyster Point, South San Francisco –** A seven-building development totaling 1,030,344 sq. ft. of building space. Project includes 884,500 sq. ft. of office and research/development space, a 126,000 sq. ft. 200 room hotel including restaurant, 20,000 sq. ft. of retail, and an 8-story parking structure. Other on and off-site improvements are proposed.	2013-2019
2	1.5 miles north of SFO property	**Genentech Master Plan, South San Francisco –** Changes to Genentech's original master plan (2007) include adding more parcels to the Genentech Zoning District and minor changes of use. There are no plans for new facilities at the moment, but the acquisition of additional parcels into the plan suggests something may be in the works.	CEQA docs do not say; assume worst case – 2015-2016
3	1000 Gateway Blvd, about 2.25 miles north of SFO property	**Gateway Business Park Master Plan Modification, South San Francisco –** Modification to an existing phasing plan for a 451,485 square foot development at Gateway Business Park (Oyster Point Blvd and Gateway Blvd). Project would include 5-6 new buildings and 2-4 parking structures, including the demolition of existing buildings, on 22 acres to be completed between 2013 and 2025. South San Francisco published an EIR in 2010 for the project.	2013 – 2025
4	One mile southwest of SFO property	**120 South El Camino Real, Millbrae –** The project would demolish an existing fast food restaurant and construct a new mixed use building with 54 dwelling units above 11,000 sq. ft. of commercial space. The site is zoned "C", Commercial, and is located approximately 570 feet south of the Millbrae BART Station and is directly across the street from the Millbrae Caltrain Station. The project falls within Site 11 identified in the Millbrae Station Area Specific Plan (MSASP). The new building would have two levels of parking, with 33 commercial parking spaces at-grade and 81 residential parking spaces on one level, partially below grade. The three levels of dwelling units would be over a podium above the commercial level. The overall building height would be 52'6", which lies within the 55-foot height limit set in the MSASP.	Have not started environmental process
5	2.5 miles southeast of SFO property	**300 Airport Boulevard, Burlingame –** The project would include four office buildings and an amenities center building with a total of 767,000 sq. ft. of floor area on an 18.13 acre site located at 300 Airport Boulevard (also known as 350 Beach Road). Two 5-story buildings, one 7-story building, and one 8-story building are proposed. The 2-story amenities center building would include a child care facility, an exercise facility and a café/break room. Parking would be provided in a 5.5-level parking structure, in a podium level parking area below the four office buildings, and in smaller parking lots scattered throughout the site.	Permits issued June 2012; assume construction in 2014-2016
6	Closest segment is about 1 mile away across U.S.101 from Plot 2	**Peninsula Corridor Electrification Project (CalTrain) –** The project is the electrification of the CalTrain Peninsula Corridor from its current northern terminus at 4th and King Streets in San Francisco to approximately 2 miles south of the Tamien Station in San Jose, a total distance of approximately 51 miles. The project location includes the entire JPB-owned right of way (ROW) along this 51-mile segment, additional ROW for new facilities and operational requirements and for any construction or access areas located outside the ROW. This project does not include electrifying the corridor south of Tamien. The primary purposes of the project are to provide electrical infrastructure that will be compatible with separate later use for blended service, improve train performance, and reduce long-term environmental impact by reducing noise, improving regional air quality, and reducing greenhouse gas emissions.	Start 2019

TABLE 3 (CONT.)
PAST, PRESENT, AND REASONABLY FORSEEABLE FUTURE PROJECTS

Count	Location	Project Name and Description	Anticipated Construction
7	On SFO Property	**Plot 700 Development** – New ground transportation and shuttle bus / vehicle fueling and maintenance facility on a site that was previously used as United Airlines employee parking lot.	2014
8	On SFO Property	**Storm Drain Improvements –** Update and retrofit existing drainage pump stations to allow for integration into the Airport's automated water treatment system.	2013
9	On SFO Property	**Wastewater System Improvements –** Update existing industrial and sewage systems at the Airport's Mel Leong Treatment Plant.	2016
10	On SFO Property	**Long-Term Garage Development –** Construct an additional parking garage at the Airport's Long-Term Parking Lot.	2016-2017
11	On SFO Property	**Terminal 3 Modernization (East) –** Update the existing Boarding Area E at Terminal 3 with modern systems, structures, and amenities with secure connector to Terminal 2.	Ongoing; open in January 2014
12	On SFO Property	**Terminal 3 Modernization (West) –** Increase terminal lobby depth (Boarding Areas E and F) at Terminal 3 to accommodate modern passenger screening processes and equipment, and to provide sufficient lobby queuing space for the passenger screening area.	2013-2014
13	On SFO Property	**Mel Leong Treatment Plant and Shoreline Protection Enhancements –** Identify and address shoreline enhancement opportunities in accordance with Federal Emergency Management Agency (FEMA) floodplain findings and climate action plans (i.e., sea wall construction, shoreline management, etc.).	2016
14	On SFO Property	**Seaplane Harbor Dredging –** Dredging of ingress/egress channels at Seaplane Harbor for emergency response vehicle.	2017-2018
15	On SFO Property	**Administration Facilities –** Consolidation of Airport Commission offices and employee parking at an on-Airport location.	2017-2018
16	On SFO Property	**Plot 2 Aircraft Remote Overnight Parking –** Plot 2 Aircraft Remote Overnight Parking **–** Realign South McDonnell Road and construct remote overnight aircraft parking adjacent to International Terminal Boarding Area A.	2014-2015
17	On SFO Property	**South Field Buildings Demolition –**Demolish TWA Cargo, Delta Cargo, ground transportation unit building (where ground transportation providers at the Airport are permitted and inspected), Airport vehicle fueling station, and the temporary trailer building used by the Airport's Signage department. Existing cargo tenants will be relocated. Relocate security checkpoint/airfield gate and the Emergency Response and Fire Station #3 westward on the same site to maximize airfield space.	2014-2016
18	On SFO Property	**Runway Safety Area (RSA) Program** – Adhere to the requirements of Public Law (P.L.) 109 115, which requires enhancement of runway safety areas by airports that hold a certificate under Title 14, Code of Federal Regulations (CFR), Part 139, to meet Federal Aviation Administration (FAA) design standards by December 31, 2015. The project includes runway threshold relocations, installation of a crushable engineered-concrete bed, and fill of jurisdictional waters of the United States.	2012-2015

NOTES:
sq.ft. = square feet
No large/noteworthy projects in vicinity of the Airport in San Bruno.
SOURCES: SFO Bureau of Planning and Environmental Affairs based on Office of Planning and Research CEQAnet, July 2013; and SFO Five and Ten Year Capital Plan, July 2013.

Wind and shadow impacts were not analyzed in the FEIR because it was determined that the Master Plan would not have any potential for significant wind or shadow impacts on public areas (FEIR Volume III, pp. A.8 and A.9). Regarding wind, the Airport lies near sea level, which allows the surrounding marine air from the San Francisco Bay to flow across the modified hotel project site and vicinity. The modified hotel project could redirect some of these winds down to ground level. However, wind speeds at outdoor areas and sidewalks surrounding the modified hotel project site are already generally reduced by the existing terminal and garage buildings, as well as by elevated Airport structures for automobiles and the AirTrain. In addition, redirected winds would not affect a park or other public recreational area due to the distance between the modified hotel project site and nearby recreational areas and intervening infrastructure and topography.

The modified hotel project, would generate new shadows westward in the early morning hours, year-round, across U.S. 101 and into the West of Bayshore Airport Commission Lands. Shadows would shorten and shift northward as the day progresses. In the afternoon and evening, shadows would lengthen and extend eastward toward the existing airport parking garages, terminals, and aprons. Some of the new shadow generated would be encompassed within the existing shadows cast by the nine-story IT-A garage, as well as by the existing AirTrain and U.S. 101 structures. New shadow could be cast on roadways and passenger loading zones within the Airport, but this additional shadow would not affect the use or function of these areas. Shadow from the modified hotel project would not reach recreational facilities located in the City of Millbrae, the nearest of which is Marina Vista Park, 0.09 miles southwest of the project site and west of U.S. 101. Therefore, the modified project, project would not result in any new or substantially greater wind and shadow impacts beyond those identified in the FEIR Initial Study.

Cultural Resources

Cultural resources are analyzed on pp. 183 to 191 and pp. 371 to 373 of the Master Plan FEIR. The FEIR evaluated the effects of the Master Plan on cultural resources, including archaeological, historic, and paleontological resources. The modified hotel project would be constructed in the same location as development analyzed under the FEIR. Therefore, cultural resources impacts particular to the modified hotel project site would be the same as those presented in the FEIR.

The FEIR determined that the Master Plan projects would be constructed on former Bay land that was filled and drained with artificial fill to create a broad flat area. While prehistoric cultural activity could have occurred, such areas have been altered by the prior land reclamation and intense airport development. Further, a cultural resources report[13] found that while there are four prehistoric archaeological sites located in the vicinity of the Airport, none were on Airport property. The Airport property boundary and the planned location of the modified hotel project have not changed since adoption of the FEIR. Therefore, the modified project, including the modified hotel project, would not result in any new or substantially greater prehistoric archaeological impacts beyond those identified in the FEIR.

[13] David Chavez Associates, *Cultural Resources Evaluation for the San Francisco International Airport Master Plan EIR*, San Mateo County, California, August 1990, revised February 1991. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

The FEIR determined that there are no on-Airport historic properties that are on or eligible for the NRHP that will be affected by the Master Plan program.[14] The modified hotel project would have less than significant impacts on historical architectural resources as defined in CEQA Section 15064.5 because there are no such resources within the modified hotel project site or immediately adjacent. Therefore, the modified project, including the modified hotel project, would not result in any new or substantially greater impacts to historic properties beyond those identified in the FEIR.

The FEIR determined that the while there are no known on-airport archeological resources, the possibility of an inadvertent discovery of buried archeological resources—including those that contain human remains—cannot be completely eliminated. While there would be no additional impact with construction of the modified hotel project, implementation of Mitigation Measure M-CP-1, Accidental Discovery Measures, would reduce impacts to historical archeological resources, as defined in Section 15064.5, consistent with the conclusion of the FEIR. In addition, implementation of Mitigation Measure M-CP-2, Inadvertent Discovery of Human Remains and Associated or Unassociated Funerary Objects would ensure that impacts to human remains associated with the modified project would be less than significant, consistent with the finding in the FEIR and no new mitigation measures would be required. Mitigation Measures M-CP-1 and M-CP-2 reflect updates and substitute Master Plan FEIR Mitigation Measures I.D.1.a through I.D.1.d.[15] The updated mitigation measures are considered more efficacious than the previous measures, and their implementation would not alter the impact conclusions reached in the FEIR.

> **Mitigation Measure M-CP-1 – Accidental Discovery Measures.** The following mitigation measure shall be 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, or pile driving firms); or to any utilities firm involved in ground-disturbing activities within the project site. Prior to any ground-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, and supervisory personnel. The SFO Bureau of Planning and Environmental Affairs (BPEA) 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 ground-disturbing activity of the project, the project Head Foreman and/or SFO BPEA shall immediately notify the ERO and shall immediately suspend any ground-disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures should be undertaken.

---

[14] *Ibid*.

[15] The full text of the Master Plan FEIR mitigation measures are available in the Final Mitigation Monitoring and Reporting Program (MMRP), as adopted by the Airport Commission on November 1992. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

If the ERO determines that an archeological resource may be present within the project site, SFO BPEA shall retain the services of an archeological consultant from the pool of qualified archeological consultants maintained by the Planning Department archeologist. 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 archeological monitoring program; or an archeological testing program. If an archeological monitoring program or archeological testing program is required, it shall be consistent with the San Francisco Planning Department, Environmental Planning Division guidelines for such programs. The ERO may also require that the Airport 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, evaluating 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 Archeological Site Survey NWIC shall receive one copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The San Francisco Planning Department, Environmental Planning Division shall receive 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 NRHP/CRHR. 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-2 – Inadvertent Discovery of Human Remains and Associated or Unassociated Funerary Objects including those Interred Outside of Formal Cemeteries. The treatment of human remains and of associated or unassociated funerary objects discovered during any ground-disturbing activity shall comply with applicable state laws. In the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps shall be taken:

1) The Airport Commission will ensure that there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until:
    a) The San Mateo County Coroner must be contacted to determine that no investigation of the cause of death is required, and
    b) If the San Mateo County Coroner determines the remains to be Native American:
        i) The County Coroner shall contact the Native American Heritage Commission within 24 hours;

ii) The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descended from the deceased Native American;

iii) The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98, or

2) Where the following conditions occur, the Airport Commission or its authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance:

a) The Native American Heritage Commission is unable to identify a most likely descendent, or the most likely descendent failed to make a recommendation within 24 hours after being notified by the Commission;

b) The identified descendant fails to make a recommendation; or

c) The Airport Commission or its authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.

This shall include immediate notification of the San Mateo County Coroner, and in the event of the San Mateo County Coroner's determination that the human remains are Native American, notification of the California State Native American Heritage Commission, who shall appoint a Most Likely Descendant (MLD) (PRC Section 5097.98). The archeological consultant, project sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines Section 15064.5[d]). The agreement shall take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. California PRC allows 24 hours to reach agreement on these matters. If the MLD and the other parties do not agree on the reburial method, the project shall follow Section 5097.98(b) of the California PRC, which states, "the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance."

As stated above, the modified hotel project would be constructed in the same location as the previously assessed Master Plan hotel development, and would not result in any new or substantially greater impacts to cultural resources as analyzed under the FEIR. Therefore, the contribution of the modified project to cumulative impacts on cultural resource would not be cumulatively considerable. Inadvertent discovery of historic or other archeological resources, described above, or human remains, cannot be conclusively ruled out, and these potential impacts could result in a cumulatively considerable contribution to cumulatively significant impacts. Implementation of **Mitigation Measure M-CP-1** and **Mitigation Measure M-CP-2** would address this unlikely eventuality. They would limit the modified project's contribution to any cumulative impacts related to archeological resources and human remains to a level that is less than cumulatively considerable.

Transportation and Circulation

Transportation and circulation impacts of Master Plan projects are analyzed on pp. 125 to 152 and pp. 265 to 330 of the FEIR. The FEIR determined that several impacts related to transportation and circulation were potentially significant, but would be reduced to a less-than-significant level with implementation of the mitigation measures specified in the MMRP for the FEIR. To the extent that transportation measures specified in the MMRP might not avoid or substantially lessen the impacts of Master Plan projects, the Airport Commission made the finding that the environmental, economic, and social benefits of the Master Plan would override the remaining impacts related to traffic, as stated fully in the Airport Commissions adoption of the Statement of Overriding Considerations.[16]

The modified hotel project would not affect the level of air traffic, introduce unsafe design features or incompatible uses, or restrict emergency vehicles from accessing the site or nearby areas. Moreover, given its location, within Airport property, with direct access to an AirTrain station and shuttle bus service, the modified hotel project would not conflict with adopted policies, plans or programs regarding alternative transportation facilities and services. In fact, construction of the AirTrain station would enhance the Transportation System Management program set forth in Mitigation Measure I.A.1.a of the FEIR (below). Therefore, the modified project would not result in any new or substantially greater impacts to transportation and circulation beyond those identified in the FEIR and no new mitigation measures would be required.

Traffic trip generation for the modified hotel project was estimated using the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 9th Edition,[17] using the "Hotel" land use category (Code 310). Due to the design of the modified hotel project, specifically the inclusion of an AirTrain station in addition to ground shuttle buses connecting the hotel with the SFO terminals and the entire BART system, the modified hotel project would result in a reduction in ITE-estimated project vehicle trips.[18] The existing shuttle that serves the modified hotel project site would continue to provide riders with a direct link to ground transportation options, including BART, taxis/limos, shared vans, two parking garages at the International Terminal complex, the long-term parking garage/lot, and rental car facilities.

To determine the total trip generation of hotel uses at the Airport, regardless of hotel construction or renovation date, the FEIR considered two on-airport hotels on two separate lots, one being the 527-room Hilton Hotel that existed on the site at the time, which was included in the FEIR baseline condition and future year analyses, and a new 240-room hotel located at the International Terminal. The modified hotel project does not include a hotel at the International Terminal and includes a smaller hotel at the Plot 2 site than analyzed in the FEIR, and thus would generate fewer vehicle trips overall. As presented in **Table 4**, the modified hotel project is estimated to result in about 5,023 fewer daily vehicle trips on area roads than

---

[16] Airport Commission, SFO Master Plan, *Findings Related to the Approval of the SFIA Master Plan*, November 3, 1992, pp. 58 to 62. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

[17] Institute of Transportation Engineers (ITE), *Trip Generation Manual*, 9th Edition, 2012.

[18] Lund, Holly, et. al., *Travel Characteristics of Transit-Oriented Development in California, Final Report*, January 2004. Available online at: *http://www.bart.gov/docs/planning/travel_of_tod.pdf*. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

anticipated in the FEIR. Additionally, the modified hotel project would generate approximately 393 and 459 fewer a.m. and p.m. peak-hour trips, respectively. The modified hotel project would also generate fewer trips due to vehicle trip reductions anticipated from the inclusion of an AirTrain station and ground shuttle buses connecting the hotel with SFO's passenger terminals and the entire BART system.

As shown in **Table 5**, traffic volumes on U.S. 101 in the vicinity of SFO in 2006 and 2012 published by Caltrans indicate that the forecasted 2006 traffic volume on p. 310 of the FEIR was overestimated, and as such, the level of congestion (impact on level of service) reported in the FEIR under 2006 conditions was similarly overstated. The actual lower 2006 traffic volume, in combination with anticipated reduction in vehicle trips generated by the modified hotel project indicates that the level of congestion reported on p. 310 of the FEIR under 2006 with project conditions also was overstated. As such, the impacts of the modified project on U.S. 101 would be less than those reported on pp. 310 to 313 of the FEIR.

No added mitigation measures would be required. However, the Airport Commission would be required to implement the following FEIR mitigation measures to minimize impacts associated with the modified hotel project. Both mitigation measures have been implemented and would continue to be applied to the modified project, including the modified hotel project: **FEIR Mitigation Measure I.A.1.a, Transportation System Management Program**; **FEIR Mitigation Measure I.A.1.b, Transit Information Program; FEIR Mitigation Measure I.A.d.iii, Parking Capacity Management.** These mitigation measures require the Airport Commission to fund, coordinate, and implement a program to reduce single occupancy vehicle trip rates for passengers and employees, and fund and implement a program that disseminates transit information to airlines and travel agencies to encourage public transit to the airport.

TABLE 4
MODIFIED PROJECT TRIP GENERATION COMPARED TO THE MASTER PLAN FEIR

Land Use	Units[a]	Daily Trips	A.M. Peak Hour Trips	P.M. Peak Hour Trips
Master Plan FEIR:				
Phase I: New Hotel	240	2,084	156	181
Phase II: Renovated Hilton Hotel[b]	527	4,585	344	399
Total Hotel Trips Evaluated in Master Plan FEIR	***767***	***6,669***	***500***	***580***
Modified Hotel Project	403	1,646[c]	107	121
Total Net New Vehicle Trips		**-5,023**	**-393**	**-459**

NOTES:

ITE = Institute of Transportation Engineers

[a] Units represent the number of hotel rooms. As defined by ITE, these rates also account for the proposed meeting space and retail use.

[b] Hotel trips generated from renovation of the Hilton Hotel under the Master Plan was included in the baseline condition analyzed in the FEIR. To provide a comparison of the hotel development components of the Master Plan, the daily trips generated from the then existing Hilton Hotel is provided herein.

[c] Assumed that approximately 50 percent of all vehicular trips that would be generated by a standard suburban hotel would not occur (i.e., patrons would utilize either BART, the AirTrain or the shuttle bus to access the modified hotel project site). As a result, the estimated number of vehicle trips was reduced by 50 percent. Therefore, 403 hotel rooms x 8.17 (ITE trip generation rate for hotels) x 50 percent equal 1,646 vehicle trips. For an entire weekday, the modified hotel project is estimated to result in an additional 1,646 vehicle trips on area roads.

SOURCES: Institute of Transportation Engineers, 2012; and SFO Master Plan FEIR, 1992.

TABLE 5
PEAK-HOUR TRAFFIC VOLUMES ON U.S. 101
IN AREA OF SAN FRANCISCO INTERNATIONAL AIRPORT

	Peak Hour Traffic Volumes (U.S. 101)
SFO FEIR 2006 Forecast	19,814 Vehicles
Caltrans Actual 2006	16,400 Vehicles
Caltrans Actual 2012	16,700 Vehicles

SOURCES: Caltrans, Traffic Volumes on California State Highways, 2007 and 2013.

Regarding parking, the modified hotel project would provide 296 parking spaces for the use of hotel guests. The estimated parking demand of 242 spaces would be accommodated by the proposed parking supply.

Therefore, the modified project, including the modified hotel project, would not result in any new or substantially greater impacts to transportation and circulation beyond those identified in the FEIR and no new mitigation measures are required. Regarding cumulative impacts, the modified hotel project is smaller than the hotel development analyzed in the FEIR, and thus would generate fewer vehicle trips. Moreover, as noted previously actual traffic volumes under existing (2012/2013) conditions are much lower than that estimated in the FEIR for 2006 conditions and the level of service on Airport roadways and nearby roadways is better than what was projected in the FEIR (i.e., less congestion). Therefore, the contribution of the modified hotel project to cumulative impacts on transportation would not be cumulatively considerable.

Noise

Noise impacts of the Master Plan projects were analyzed on pp. 153 to 170 and pp. 331 to 352 of the FEIR. Aircraft noise metrics are described on pp. 153 to 154 in Volume I and Appendix C, *Noise*, in Volume III of the FEIR.

Construction Noise and Vibration

The FEIR determined that pile driving, if needed during construction activities, would affect the Lomita Park residential area, which is located about 600 feet west of the modified hotel project site. The FEIR concluded (p. 435) that construction pile-driving noise, while temporary, would be significant and would exceed the State Department of Health Services' Recommended Land Use Compatibility Guidelines for Community Noise.[19] However, temporary construction noise impacts associated with implementation of the Master Plan have been avoided or substantially lessened, to the maximum extent possible, through implementation of mitigation measures adopted by the Airport Commission and specified in the MMRP for the FEIR. To the extent that construction noise mitigation measures specified in the MMRP might not avoid or substantially lessen the impacts of Master Plan projects, the Airport Commission made the

[19] State of California Governor's Office of Planning and Research, *General Plan Guidelines*, Appendix C: Noise Element Guidelines.

finding that the environmental, economic, and social benefits of the Master Plan would override the remaining impacts related to construction noise, as stated fully in the Airport Commissions adoption of the Statement of Overriding Considerations.[20]

There would be no pile driving activities for the modified hotel project because the reinforced concrete piles would be predrilled, cast in place, and then capped; the AirTrain station would be supported above ground at the existing elevated AirTrain tracks. Construction activities associated with the modified hotel project that would have the potential to result in changes to the existing noise environment include construction traffic, grading, excavating, compacting soil, and other activities associated with construction of this type. Heavy construction equipment including excavators, construction cranes, and dump trucks may cause temporary increases in vibration levels near the modified hotel project site. Due to the types of land use in the area immediately surrounding the modified hotel project site and the approximately 600-foot distance to the nearest sensitive receptor, the production of construction noise is not likely to have a substantial impact on or near the site or on any sensitive receptors.

Nevertheless, the modified hotel project would include implementation of the following FEIR mitigation measures: **FEIR Mitigation Measure I.C.1.a, Noise Reduction Measures; FEIR Mitigation Measure I.C.1.b, Predrilling Holes;** and **FEIR Mitigation Measure I.C.1.d. Construction Barriers.** These measures require construction contractors to: muffle and shield construction vehicles and to use electric power rather than diesel-power, as feasible; predrill holes for foundation piles; and install barriers around the site and stationary equipment, and if possible to locate such equipment in pitted/excavated areas**.** FEIR Mitigation Measure I.C.1.c (Restrictions on Pile Driving) would not apply to the modified hotel project because there would be no pile driving activities during construction Therefore, the modified project, including the modified hotel project, would not result in any new or substantially greater impacts beyond those identified in the FEIR, and no new mitigation measures would be required.

Operational Noise

The FEIR analyzed future peak-hour operational noise from vehicles on U.S. 101 and local roads that serve the Airport and determined that the Master Plan projects would yield a net increase of two decibels over existing ambient noise levels on the roads. The FEIR concluded that two decibel noise level increases would not be perceptible to people. As shown on **Table 4**, above, the modified hotel project is estimated to result in about 5,023 fewer daily vehicle trips on area roads than anticipated in the FEIR. Thus, traffic-related noise from the modified hotel project is not likely to substantially alter existing ambient noise levels. Further, existing noise levels near Plot 2 are primarily influenced by U.S. 101, which separates the modified hotel project site and aircraft traffic from the nearest noise-sensitive receptor located approximately 600 feet from the Plot and west of U.S. 101).

The aircraft noise analysis included in the Master Plan FEIR for the two future build-out years (1996 and 2006) is based on an FAA-approved forecast. The forecast level of annual aircraft operations and

[20] Airport Commission, SFO Master Plan, *Findings Related to the Approval of the SFIA Master Plan*, November 3, 1992, pp. 58 to 62. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

associated enplaned passengers was not realized at SFO, and annual aircraft operations are currently 13.3 percent below the long-term Master Plan forecast. The modified hotel project would not directly or indirectly change the aircraft fleet mix, number of aircraft operations, or aircraft flight tracks at the Airport, and construction of the modified hotel project would have no impact on the aircraft noise levels or contours as originally analyzed in the FEIR. Thus the modified project, including the modified hotel project, would not result in an increase in aircraft operations or the number of enplaned passengers at the Airport that could lead to significant temporary or periodic increases in noise levels in the airport environs, above levels anticipated in the FEIR.

Plot 2 is not in an area restricted for aircraft operations or other land uses that would preclude development of a hotel. The modified project is located within Airport Influence Area B as defined in the SFO Airport Land Use Compatibility Plan (ALUCP) and is subject to the noise, safety, airspace protection, and overflight policies defined in the ALUCP[21]. However, the use of the Plot 2 site for hotel land uses is consistent with land use compatibility policies contained in the SFO ALUCP. Plot 2 is located outside the area exposed to aircraft noise of Community Noise Equivalent Level (CNEL) 65 decibels and higher as shown on Figure IV-6 of the ALUCP. Development of the modified hotel project on Plot 2 would be consistent with the noise policies contained in the ALUCP; and 14 Code of Federal Regulations Part 150, Appendix A, Table 1, and would not affect aviation activity levels (i.e., aircraft operations) at SFO.

Therefore, the modified project, including the modified hotel project, would not result in any new significant noise impacts to beyond those identified in the FEIR or substantially increase the severity of a significant impact, and no new mitigation measures would be required. The contribution of the modified project to cumulative noise impacts would not be cumulatively considerable.

Air Quality

Air quality impacts of Master Plan projects are analyzed on pp. 171 to 177 and pp. 353 to 365 of the FEIR. The FEIR determined that the baseline emissions estimate for carbon monoxide already levels violated the State's eight-hour CO standards for the five off-Airport intersections analyzed and concluded that construction and operation of Master Plan projects would result in continued violations of State and federal ambient air quality standards for carbon monoxide due to landside vehicular traffic. Further, Master Plan project-generated emissions would be over the BAAQMD daily threshold for hydrocarbons, oxides of nitrogen, oxides of sulfur, and particulate matter (PM_{10}). However, impacts to air quality associated with implementation of the modified project have been avoided or substantially lessened, to the maximum extent possible, through implementation of mitigation measures adopted by the Airport Commission and specified in the MMRP for the FEIR. To the extent that air quality mitigation measures

[21] City/County Association of Governments of San Mateo County. *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport*. October 2012. Available online at: *http://www.ccag.ca.gov/pdf/plans-reports/2012/Consolidated_CCAG_ALUCP_10-29-12.pdf* Based on California Code of Regulations, Title 21, Division 2.5, Chapter 6, Section 5006. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

specified in the MMRP might not avoid or substantially lessen the impacts of Master Plan projects, the Airport Commission made the finding that the environmental, economic, and social benefits of the Master Plan would override the remaining impacts related to air quality, as stated fully in the Airport Commissions adoption of the Statement of Overriding Considerations.[22]

Federal, State and local ambient air quality standards have been revised several times since the certification of the FEIR and air quality within the San Francisco Bay Area has generally improved. In light of the changes in these air quality regulations since 1992, a detailed air quality assessment was performed for the modified hotel project. The *Air Quality Technical Report*[23] prepared for the modified hotel project provides detailed information regarding the inputs, assumptions and methodologies used for the construction emissions inventory, operational emissions inventory, and health risk assessment (including cumulative health risks for construction and operation of the modified hotel project). The following sections describe the existing regulatory context and summarize the key findings of the *Air Quality Technical Report*.

Regulatory Context

The Bay Area Air Quality Management District (BAAQMD) is the regional air quality management 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 ensuring that air quality in the SFBAAB attains and maintains federal and state ambient air quality standards, as established by the federal Clean Air Act (CAA) and the California Clean Air Act (CCAA), respectively. State and federal ambient air quality standards have been established for the following six criteria air pollutants: ozone, carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead.

Table 6 identifies air quality significance thresholds for criteria pollutants within the SFBAAB. 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.

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. Unlike criteria air pollutants, TACs do not have ambient air quality standards but are regulated by the BAAQMD using a risk-based approach. This approach uses a health risk assessment to determine which sources and pollutants to control as well as the degree of control.

---

[22] Airport Commission, SFO Master Plan, *Findings Related to the Approval of the SFIA Master Plan*, November 3, 1992, pp. 57 to 58. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

[23] Environmental Science Associates, *Air Quality Technical Report for San Francisco International Airport Hotel Project*, January 2014. This document is available for public review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

TABLE 6
CRITERIA POLLUTANT SIGNIFICANCE THRESHOLDS

Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs./day)	Average Daily Emissions (lbs./day)	Annual Average Emissions (tons/year)
ROG	54	54	10
NOx	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	
Local CO	None	9.0 ppm (8-hour average); 20.0 ppm (1-hour average)	

NOTES:
ROG = reactive organic gases $PM_{2.5}$ = fine particulate matter PM_{10} = coarse particulate matter
NOx = oxides of nitrogen CO = carbon monoxide

SOURCE: Bay Area Air Quality Management District, May 2011.

Vehicle tailpipe emissions contain numerous TACs, including benzene, 1,3-butadiene, formaldehyde, acetaldehyde, acrolein, naphthalene, and diesel exhaust.[24] Engine exhaust from diesel, gasoline, and other combustion engines, is a complex mixture of particles and gases, with collective and individual toxicological characteristics. While each constituent pollutant in engine exhaust may have a unique toxicological profile, health effects have been associated with proximity, or exposure, to vehicle-related pollutants collectively as a mixture.[25] 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.[26] 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.[27]

Table 7 presents risks and hazards thresholds for new sources and receptors applicable to the project risk and cumulative risks.

---

[24] San Francisco Department of Public Health (SFDPH), *Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review,* May 2008. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

[25] Delfino RJ, 2002, "Epidemiologic evidence for asthma and exposure to air toxics: linkages between occupational, indoor, and community air pollution research," Environmental Health Perspectives, 110(S4):573-589. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

[26] SFDPH, *Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review,* May 2008. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

[27] California Air Resources Board (ARB), Fact Sheet, "The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines," October 1998. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

TABLE 7
RISK AND HAZARDS SIGNIFICANCE THRESHOLDS FOR NEW SOURCES AND RECEPTORS

Endpoint	Project Threshold	Cumulative Threshold
Residential Receptors		
Lifetime Excess Cancer Risk	>10 in one million	>100 in one million
Chronic Hazard Index	>1 HI	>10.0 HI
Acute Hazard Index	>1 HI	NA
$PM_{2.5}$ Concentration [$\mu g/m^3$]	0.3	0.8

BAAQMD = Bay Area Air Quality Management District; $\mu g/m^3$ = micrograms per cubic meter; PM = particulate matter; HI = Hazard Index; NA = Not Applicable

SOURCE: Bay Area Air Quality Management District, May 2011.

Cancer risk is defined as the lifetime probability of developing cancer from exposure to carcinogenic substances. Cancer risks are expressed as the chances in one million of developing cancer, for example, ten cancer cases among one million people exposed. Both acute and chronic adverse health impacts unrelated to cancer are measured against a hazard index (HI), which is defined as the ratio of the predicted incremental exposure concentration from the project to a published reference exposure level (REL) for a particular TAC that could cause adverse health effects. If the overall HI for the highest-impacted organ system is greater than one, then, based on BAAQMD significance criteria, the impact is considered to be significant. Because emissions of $PM_{2.5}$ are associated with health risks, the BAAQMD has established a $PM_{2.5}$ concentration threshold to protect public health. Thresholds applicable to cumulative cancer risks, chronic HI, and $PM_{2.5}$ concentration values **Table 8** account for emissions from both project and non-project sources that present a potential health risk.

A project would have a significant air quality impact if construction activities would result in an incremental increase in localized annual average concentrations of $PM_{2.5}$ exceeding 0.3 micrograms per cubic meter ($\mu g/m^3$) within a 1,000-foot radius from the property line of the construction area or a receptor. A project would also have a significant air quality impact if it would expose persons to substantial levels of TACs (including DPM), such that the probability of contracting cancer for the Maximally Exposed Individual (MEI) exceeds 10 in one million or if it would expose persons to TACs such that a non-cancer Hazard Index of 1.0 would be exceeded.

With regard to cumulative impacts from $PM_{2.5}$, a significant cumulative air quality impact would occur if localized annual average concentrations of $PM_{2.5}$ would exceed 0.8 micrograms per cubic meter at any receptor from project operations in addition to existing emission sources and cumulative emissions sources within a 1,000-foot radius of the property line of the source or receptor. With regard to cumulative impacts from TACs, a significant cumulative air quality impact would occur if the probability of contracting cancer for the MEI would exceed 100 in one million or if the project would expose persons to TACs such that a non-cancer chronic Hazard Index of 10.0 would be exceeded at any receptor as a result of project operations, in addition to existing emission sources and cumulative emissions sources within a 1,000-foot radius of the modified hotel project site.

Fugitive Dust Evaluation

The FEIR determined that surface traffic and construction activities associated with the Master Plan projects could contribute to exceedances of ambient air quality standards and that these air quality impacts were potentially significant impacts. Significant impacts to air quality would be substantially lessened by implementation of mitigation measures included in the MMRP for the FEIR. Specifically, fugitive dust generated during construction is subject to implementation of **FEIR Mitigation Measure I.B.1.a, Construction Period Activities,** to minimize fugitive dust associated with construction of Master Plan projects.

Since certification of the Master Plan FEIR, the BAAQMD has issued the *CEQA Air Quality Guidelines,* which recommend implementation of best management practices (BMPs) to control fugitive dust emissions for all projects located within the SFBAAB, whether or not a project's construction-related emissions exceed applicable thresholds of significance. The BAAQMD has identified eight "Basic Construction Mitigation Measures," and regards these measures as meeting the BMP threshold for fugitive dust emissions. These BMP's reflect current air quality regulations and are consistent with and considered more efficacious than the measures provided in the MMPR for the FEIR. Therefore, **Mitigation Measure I-AQ-1** listed below will replace FEIR Mitigation Measure 1.B.1.a, and would be implemented to address fugitive dust associated with construction of the modified hotel project, consistent with the BAAQMD's recommendations for all projects within the SFAAB.

Mitigation Measure I-AQ-1 – Implement Basic Construction Best Management Practices

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- SFO shall post one or more publicly visible signs with the telephone number and person to contact at SFO with complaints related to excessive dust or vehicle idling. This person shall respond to complaints and, if necessary, take corrective action within 48 hours. The telephone number and person to contact at the BAAQMD's Compliance and Enforcement Division shall also be provided on the sign(s) in the event that the complainant also wishes to contact the applicable air district.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes. Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.

- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 miles per hour.
- The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities in the same area at any one time shall be limited. Activities shall be phased if feasible to reduce the amount of disturbed surfaces at any one time.

The modified project, including the modified hotel project, would not result in any new dust-related air quality impacts beyond those identified in the FEIR or substantially increase the severity of a significant impact, and no additional mitigation measures would be required.

Criteria Air Pollutants Evaluation

Land use projects may contribute to regional criteria air pollutants during the construction and operational phases of a project. As documented in the *Air Quality Technical Report*, construction-related emissions of criteria pollutants and operational-related emissions of criteria pollutants associated with the modified project would not exceed the applicable thresholds presented in **Table 8**. As a result, the modified project would not violate an air quality standard, contribute substantially to an air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants within the SFBAAB.

TABLE 8
CRITERIA POLLUTANT EMISSIONS

	Thresholds	Daily Emissions Estimate (lbs/day)	
Pollutant	Average Daily Emissions (lbs./day)	Construction	Operation
ROG	54	11	4.0
NOx	54	46.7	2.9
PM_{10}	82 (exhaust)	1.7	1.2
$PM_{2.5}$	54 (exhaust)	1.1	0.4

Therefore, the modified project, including the modified hotel project, would not result in any new significant effects beyond those identified in the FEIR or substantially increase the severity of a significant impact, and no new mitigation measures would be required.

Health Risks and Hazards Evaluation – Construction

The FEIR did not analyze health risks and hazards evaluation for construction activities. Current CEQA Guidelines include analysis of construction related health risks and hazards evaluation. Therefore, the analysis described below includes quantitative analysis of whether construction of the modified hotel project would result in significant health risks at the project and cumulative levels.

Some receptors are considered more sensitive to air pollutants than others due to preexisting health problems, proximity to the emissions source, or duration of exposure to air pollutants. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be relatively sensitive to poor air quality because the very young, the old, and the infirm are more susceptible to

respiratory infections and other air quality-related health problems than the general public. Residential areas are also considered sensitive to poor air quality because people in residential areas are often at home for extended periods. Recreational land uses are moderately sensitive to air pollution, because vigorous exercise associated with recreation places a high demand on respiratory system function. Several residential receptors are located approximately 600 feet west of the modified hotel project site. Schools and day care facilities are located farther than 3,000 feet from the modified hotel project site.

Construction activities would produce DPM, $PM_{2.5}$ emissions, and other TACs associated with construction equipment such as haul trucks, loaders, and backhoes. As shown in **Table 9** below and as detailed in the *Air Quality Technical Report*, the modified project would not result in any new significant air quality impacts or substantially increase the severity of a significant impact and no new mitigation measures would be required.

TABLE 9
ESTIMATED MAXIMUM CONSTRUCTION HEALTH RISK HAZARDS AND $PM_{2.5}$ CONCENTRATIONS

Emission Category	Cancer Risk	Chronic Hazard Index	Acute Hazard Index	$PM_{2.5}$ Concentration (Annual, $\mu g/m^3$)
Construction Equipment DPM Exhaust	0.504	0.0005	N/A	0.0001
Diesel Equipment Non-DPM TAC Exhaust	0.219	0.0002	0.035	N/A
Gasoline Powered Equipment TAC Exhaust and Evaporative Emissions	0.0	0.00003	0.0003	N/A
Project-Level Significance Threshold	**10**	**1**	**1**	**0.3**
Project Total	**0.723**	**0.001**	**0.035**	**0.0001**
U.S. Highway 101 (Cumulative Project)	14.06	0.013	0.014	0.12
Cumulative Significance Threshold	**100**	**10**	**NA**	**0.8**
Cumulative Total	**14.73**	**0.014**	**0.049**	**0.12**

NOTES:
DPM = diesel particulate matter; TAC = toxic air contaminants; NA = Not Applicable
See Appendix C of the AQTR for additional information.
SOURCE: ESA Airports, November 2013.

The excess cancer risk represents exposure for the maximum exposed individual receptor (MEIR), located at a residence 600 feet west of the modified hotel project site (and west of U.S. 101). Excess cancer risk due to construction activities are below the BAAQMD's threshold of 10 per million. As a result of project-related construction, the chronic HI would be less than 0.01 and the acute HI would be 0.035 at the MEIR as shown in **Table 9**. The chronic and acute HI would be below the BAAQMD threshold of 1.0.

As shown in **Table 9**, the maximum annual $PM_{2.5}$ concentration as a result of project construction would be 0.0001 $\mu g/m^3$ at the MEIR. The annual $PM_{2.5}$ concentration due to construction of the modified hotel project is below the BAAQMD threshold of 0.3 $\mu g/m^3$.

Therefore, the modified project, including the modified hotel project, would not result in any new significant health impacts or substantially increase the severity of a significant impact, and no new mitigations measures would be required.

U.S. 101 is within 1,000 feet of the modified hotel project site. At the closest point, U.S. 101 is within 250 feet of the closest sensitive receptor (which is approximately 600 feet west of the modified hotel project site). Cumulative cancer risks, chronic HI, and $PM_{2.5}$ concentration values shown in **Table 9** are lower than BAAQMD's cumulative thresholds; therefore, the cumulative impacts to health risks would be less than significant.

Health Risks and Hazards Evaluation – Operations

The FEIR did not analyze health risks and hazards evaluation for operation activities. Current CEQA Guidelines include analysis of operational health risks and hazards evaluation. Accordingly, the analysis described below includes quantitative analysis of whether operation of the modified hotel project would result in significant health risks at the project and cumulative levels.

Individual projects result in emissions of toxic air contaminants primarily as a result of an increase in vehicle trips. The modified project would also include a backup emergency generator. The *Air Quality Technical Report* provides detailed assumptions and methodologies for the operational health risk assessment. As shown on **Table 10** and as further discussed below, the modified project would not result in any new significant impacts or substantially increase the severity of a significant impact, and no new mitigation measures would be required.

As shown on **Table 10**, the excess cancer risk due to the modified hotel project operations would be 0.78 at the MEIR located approximately 600 feet west of Plot 2, which is below the BAAQMD threshold of 10 per million. As a result of the modified hotel project operations, the chronic HI would be less than 0.01 and the acute HI would be 0.0021 at the MEIR. The chronic and acute HI would be below the BAAQMD threshold of 1.0. The maximum annual $PM_{2.5}$ concentration as a result of modified hotel project operations would be 0.00004 $\mu g/m^3$ at the MEIR, which is below the BAAQMD threshold of 0.3 $\mu g/m^3$.

Therefore, the modified project, including the modified hotel project, would not result in any new significant health impacts or substantially increase the severity of a significant impact, and no new mitigations measures would be required.

U.S. Highway 101 is within 1,000 feet of the modified hotel project site. At the closest point, U.S. 101 is within 250 feet of the closest sensitive receptor (which is approximately 600 feet west of the modified hotel project site). Cumulative cancer risks, chronic HI, and $PM_{2.5}$ concentration values shown in **Table 10** are lower than cumulative thresholds. Therefore, cumulative impacts to health risks from operational emissions would be less than significant.

TABLE 10
ESTIMATED MAXIMUM OPERATIONAL HEALTH RISK HAZARDS AND PM2.5 CONCENTRATIONS

	Cancer Risk per Million	Chronic Hazard Index	Acute Hazard Index	$PM_{2.5}$ Concentration (Annual, $\mu g/m^3$)
Diesel Backup Generator	0.066	0.00001	N/A	0.00036
On-Road Diesel Particulate Matter (DPM)	0.395	0.00007	N/A	0.00006
On-Road Diesel-Generated Organic Gas Constituents	0.085	0.0002	0.0012	N/A
On-Road Gasoline-Generated Organic Gas Constituents	0.230	0.0003	0.0009	N/A
Project-Level Significance Threshold	**10**	**1**	**1**	**0.3**
Project Total	**0.776**	**0.0006**	**0.0021**	**0.0004**
U.S. Highway 101 (Cumulative Project)	14.06	0.013	0.014	0.124
Cumulative Significance Threshold	**100**	**10**	**NA.**	**0.8**
Cumulative Total	**14.8**	**0.014**	**0.016**	**0.12**

SOURCE: ESA Airports, November 2013.

Consistency with the 2010 Clean Air Plan

On September 15, 2010, the BAAQMD adopted the *2010 Bay Area Clean Air Plan.*[28] 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* represents the most current applicable air quality plan for the SFBAAB. Consistency with this plan is the basis for determining whether the modified project, including the modified hotel project, would conflict with or obstruct implementation of an applicable air quality plan.

Because the modified project would be consistent with the control measures listed in the 2010 Clean Air Plan and would not disrupt, delay, or otherwise hinder implementation of the 2010 Clean Air Plan. Construction related emissions would be temporary and the modified project would have a negligible effect on operational activities at the Airport. As noted above, construction and operation of the modified hotel project would not exceed the daily thresholds related to criteria pollutants.

The modified project, including the modified hotel project, would not result in any new significant impacts or substantially increase the severity of a significant impact, and no new mitigation measures would be required.

[28] Bay Area Air Quality Management District. *Bay Area 2010 Clean Air Plan*. September 15, 2010. Available online: *http://www.baaqmd.gov/Divisions/Planning-and-Research/Plans/Clean-Air-Plans.aspx*. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

Odors

The FEIR did not analyze potential impacts associated with the Master Plan projects, which is included in current CEQA Guidelines. Accordingly, the analysis described below includes an analysis of whether operation of the modified hotel project would result in significant odor impacts at the project and cumulative levels.

Typical odor sources of concern include wastewater treatment plants, sanitary landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing facilities, fiberglass manufacturing facilities, auto body shops, rendering plants, and coffee roasting facilities. During construction, diesel exhaust from construction equipment would generate some odors. However, construction-related odors would be temporary and would not persist upon construction completion. The AirTrain system is an electric system and would not generate any odorous emissions. Hotel restaurants may generate odors that would be occasionally detectable within the immediate vicinity of the modified hotel project site. However, such odors would be relatively minor, and would not be detectable at the closest sensitive receptors located approximately 600 feet west of the modified hotel project site on the west side of U.S. 101.

Therefore, the modified project, including the modified hotel project, would not result in any new significant odor impacts or substantially increase the severity of a significant impact, and no new mitigations measures would be required. The modified hotel project's contribution to cumulative impacts related to odors would not be cumulatively considerable.

Greenhouse Gas Emissions

Climate change and greenhouse gas impacts of Master Plan projects are not addressed as a separate topic in the FEIR.[29] Current CEQA Guidelines separate greenhouse gas emissions from the Air Quality topic. Therefore, the GHG analysis described herein includes a qualitative discussion of whether construction and operation of the modified project would result in significant GHG emissions.

Greenhouse Gas Evaluation

The modified hotel project would generate additional motor vehicle trips (hotel guests and employees) in the vicinity of S. McDonnell Road and would contribute to annual long-term increases in GHGs as a result of commercial operations that result in an increase in energy use, water use and wastewater treatment, and solid waste disposal. Operation of chillers and refrigeration equipment at the modified hotel project could also be a source of GHG emissions (i.e., refrigerant leakage). Construction activities associated with the modified hotel project would also result in temporary increases in GHG emissions.

Consistent with the CEQA Guidelines and BAAQMD recommendations for analyzing GHG emissions, the significance standard applied to GHG emissions generated during construction and operational phases of

[29] Senate Bill 97 (SB 97) which required the Office of Planning and Research (OPR) to amend the state CEQA guidelines to address the feasible mitigation of GHG emissions or the effects of GHGs was adopted in August 2007, approximately 15 years after the certification of the Master Plan FEIR.

the modified hotel project is based on whether the project complies with a plan for the reduction of GHG emissions.[30] Individual project compliance with the City's Greenhouse Gas Reduction Strategy is demonstrated by completion of the Compliance Checklist for Greenhouse Gas Analysis. Projects that are consistent with San Francisco's *Strategies to Address Greenhouse Gas Emissions*[31] are determined to be consistent with San Francisco's qualified GHG reduction strategy and therefore would result in a less-than-significant GHG impact. An assessment of the modified hotel project's compliance with San Francisco's *Strategies to Address Greenhouse Gas Emissions* was provided in the *Compliance Checklist for Greenhouse Gas Analysis*,[32] which concluded the modified hotel project would comply with the GHG reduction strategies.

As discussed in the *Compliance Checklist for Greenhouse Gas Analysis* for the modified hotel project, the CCSF's 2008 Greenhouse Gas Reduction Ordinance (Ordinance No. 81-08) requires all City Departments to prepare an annual department-specific climate action plan. Through the *2011 Environmental Sustainability Report* and the *2012 SFO Climate Action Plan*, the Airport Commission has vigorously supported the City's climate change initiatives (specifically Ordinance No. 81-08) and has established the achievement of carbon neutrality by 2020 as a goal for SFO.[33,34] In fiscal year 2012, SFO reduced the GHG emissions from Airport-controlled operations by 34 percent below the 1990 emissions levels, exceeding the 2017 reduction goal of GHG emissions reduction of 25 percent below the 1990 emissions level by 2017. SFO's sustainability efforts are an integral part of its mission and its effort to improve air quality and reduce global warming. The modified hotel project would be required to comply with the requirements listed above, and further would be designed and constructed in accordance with the energy efficient measures required to achieve LEED Gold certification.

Therefore, the modified project, including the modified hotel project, would not result in any new significant impacts or substantially increase the severity of a significant impact, and no new mitigation measures would be required. The contribution to cumulative impacts related to greenhouse gas emissions would not be cumulatively considerable.

---

[30] BAAQMD. *California Environmental Quality Act Air Quality Guidelines*, May 2012. Available online at: *http://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CEQA/BAAQMD%20CEQA%20Guidelines_Final_May%202012.ashx?la=en* Accessed October 18, 2013. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

[31] San Francisco Planning Department. *Strategies to Address Greenhouse Gas Emissions*. November 2010. Available online at: *http://sfmea.sfplanning.org/GHG_Reduction_Strategy.pdf* This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

[32] San Francisco Planning Department. *Compliance Checklist Greenhouse Gas Analysis and Table 2: Municipal Projects.* This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

[33] San Francisco Airport Commission. *2011 Environmental Sustainability Report*. 2011. Available online at: *http://flysfo.proofic.net.s3.amazonaws.com/default/download/about/reports/pdf/SFO_2011_Environmental_Sustainability_Report.pdf* Accessed October 18, 2013. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

[34] San Francisco Airport Commission. *2012 SFO Climate Action Plan*. May 2013. Available online at: *http://flysfo.proofic.net.s3.amazonaws.com/default/download/about/reports/pdf/SFOClimateActionPlan2013.pdf* Accessed October 18, 2013. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

Geology and Seismicity

Geologic and soils impacts of the Master Plan projects are analyzed on pp. 192 to 199 and pp. 374 to 379 of the FEIR. The FEIR determined that several impacts related to geology and soils were potentially significant, but would be reduced to a less than significant level with implementation of the mitigation measures specified in the FEIR.

Geology

Unlike the airfield, the western portion of the Airport and U.S. 101, including the modified hotel project site at Plot 2, is located within an area leveed in 1880 where the bay mud was first dried then filled resulting in a low to moderate rate of settlement. While some settlement of the modified hotel project and associated utilities could occur, the site specific soil and geotechnical investigation reports would include recommendations for design and construction guidelines (e.g., use of flexible utility connections), thereby limiting this kind of damage, as discussed on p. 375 of the FEIR.

The potential for settlement during construction would be addressed through compliance with Section 604.5 of the TIG[35], which requires the Airport Commission to ensure that adequate support and protection of existing structures during excavation. As described in the FEIR, the modified hotel project would include a foundation with pile supports that are predrilled and cast in place to the depth of the bedrock. Bedrock (Cretaceous sedimentary rocks of the Franciscan Complex) occurs about 100 feet below ground surface at the Airport. The design would be subject to approval of the SFO BICE Section as part of their review for compliance with the California Building Code.

Further, the Airport Commission would ensure implementation of the following mitigation measures specified in the FEIR related to geology: FEIR Mitigation Measure II.E.1.a, Incorporating Foundation and Geotechnical Recommendations; FEIR Mitigation Measure II.E.1.b, Earthquake Safety Inspections; and FEIR Mitigation Measure II.E.1.c, Emergency Response Plan. These mitigation measures require: the general contractor to incorporate the soil and geotechnical study recommendations into the design and construction of the project; periodic training concerning earthquake preparedness at all new facilities; and an update of the Airport's Emergency Response Plan to include new facilities. With implementation of these measures, the modified project, including the modified hotel project, would not result in any new significant impacts beyond those identified in the FEIR or substantially increase the severity of a significant impact, and no new mitigation measures would be required.

Seismicity

The modified project is not located within an Alquist-Priolo Earthquake Fault Zone or near a potential landslide area, and no active faults cross the site (FEIR p. 194). Expansive soils are not an issue because the artificial fill beneath the Plot 2 project site is not expansive and the Young Bay Mud is permanently

[35] San Francisco International Airport, *Tenant Improvement Guide*. April 1999. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

saturated. There are no unique geologic features within the modified hotel project site vicinity, and the site is not overlain by topsoil.

The FEIR states on p. 194, the Airport is located within a zone of high ground failure potential identified by the California Division of Mines and Geology. Moreover, mapping by the U.S. Geological Survey indicates that the Airport is in an area of very high liquefaction potential.[36] As a result, the modified hotel project could be affected by strong ground shaking as a result of an earthquake on one of the regional faults.

To address seismic ground shaking and ground failures, as well as the potential for the modified project to cause a geologic unit to become unstable, the structure would be supported on a deep pile foundation and built according to the more stringent seismic requirements of the current California Building Code, which would reduce the potential for damage in the event of one of these phenomena as discussed on p. 377 of the FEIR. The specific seismic requirements for the modified hotel project would be determined on the basis of a site-specific geotechnical investigation.

Further, the Airport Commission would implement the following mitigation measures specified in the FEIR (pp. 429 and 430) related to seismic design of the facility and earthquake safety: **FEIR Mitigation Measure II.F.1.c. Incorporating Foundation and Geotechnical Recommendations; FEIR Mitigation Measure II.F.1.a, Automatic Shutoff Valves; FEIR Mitigation Measure II.F.1.b, Securing Potentially Hazardous Objects;** and **FEIR Mitigation Measure II.F.1.d, Earthquake Safety Inspections**. These mitigation measures would require: the general contractor to incorporate the soil and geotechnical study recommendations into the design and construction of the project; equipping new gas lines with automatic shut off valves to be activated in an event of a major earthquake; securing of potentially hazardous equipment to floors and walls of a building; tenants of new facilities to participate in periodic training for earthquake and seismic hazards and provide updated copies of the Airport's Emergency Response Plan to San Mateo County. With implementation of these measures, the modified project, including the modified hotel project, would not result in any new significant impacts beyond those identified in the FEIR or substantially increase the severity of a significant impact, and no new mitigation measures would be required.

Regarding cumulative impacts, the modified hotel project would be constructed in the same location as development analyzed under the FEIR. Moreover, the modified hotel project would be required to adhere to the current building code, which has more stringent seismic standards than that in effect at the time of certification of the FEIR. Therefore, the contribution of the modified project, including the modified hotel project, to potential cumulative impacts on geology and seismicity would not be cumulatively considerable.

---

[36] U.S. Geological Survey, Maps of Quaternary Deposits and Liquefaction Susceptibility in the San Francisco Bay Region, California. Liquefaction Susceptibility. Open-File Report 06-1037. 2006. Available online at: *http://earthquake.usgs.gov/research/external/reports/05HQGR0151.pdf* This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

Hydrology and Water Quality

Hydrology and water quality were analyzed under two environmental topics in the FEIR. Water quality as it relates to soil erosion and stormwater runoff is addressed under geology and seismicity (pp. 192 to 199 and pp. 374 to 379), wastewater management, and stormwater treatment is addressed under utilities (FEIR pp. 232 to 236 and pp. 400 to 404). The FEIR determined that construction excavation could expose soil to erosion and enter storm drains and/or the Bay waters, especially where dewatering was required during construction. The FEIR also determined that facilities that require excavation below the water table require special design and construction techniques due to SF Bay mud and differential settlement rates of the Bay fill, as described in the FEIR. As discussed on p. 376 of the FEIR, soil would temporarily be exposed to erosion during construction of the Master Plan projects. FEIR Mitigation Measure I.E.1.c, Erosion Control (p. 429), requires the Airport Commission to "prepare and implement erosion control plans for any construction activities during the wet season that involve grading or other activities that would expose soil to erosion."

The modified hotel project includes the disturbance of more than one acre of land, thus construction activities would be subject to the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, (referred to as the Construction General Permit), including implementation of the SFO SWPPP required in accordance with this permit. Since certification of the FEIR, the Construction General Permit was revised in 2009 to include more specific requirements related to erosion control, and SFO has developed the TIG and 2011 SWPPP[37], which address additional requirements for control of construction-related storm water during construction activities at SFO. Compliance with these requirements is enforced through Airport Commission Contract Specifications for SFO construction projects, which incorporate the requirements of FEIR Mitigation Measure I.E.1.c, and would be applicable to the modified hotel project. Therefore, the modified project, including the modified hotel project, would not result in any new significant stormwater effects during construction beyond those identified in the FEIR or substantially increase the severity of a significant impact, and no new mitigation measures would be required.

As described on pp. 233-235 of the FEIR, stormwater runoff is handled at the industrial wastewater system at the MLTP, which is subject to the Airport's NPDES permit for the MLTP.[38] The modified hotel project would include excavation to a depth of approximately 15 feet below ground surface; the depth to groundwater could be as shallow as 5 feet below ground surface. Groundwater dewatering could be required to maintain a dry working area in the excavation for construction of the hotel subsurface features or associated utilities. The Airport's NPDES permit allows certain discharges of non-storm water such as groundwater pumped from construction excavations to the MLTP, provided that the discharges are necessary for construction, comply with the BMPs in the SFO SWPPP, and do not cause or contribute to a

---

[37] San Francisco International Airport, *Stormwater Pollution Prevention Plan for Construction Activities*, WDID # 2 417033001. August 23, 2011. This document is relevant to SFO construction activities and is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 86.638E.

[38] Permit Number CA0038318, RWQCB Number R2-2013-0011.

violation of water quality standards. At SFO, the applicable water quality standards are specified in SF Bay RWQCB Order No. 01-100.[39]

FEIR Mitigation Measure I.E.1.b (p. 429), Dewatering Techniques, requires the Airport Commission to "temporarily retain groundwater pumped from the site in a holding tank prior to discharge to allow suspended particulate to settle" if groundwater dewatering is required. FEIR Mitigation Measure I.F.1.k (p. 431) requires "groundwater testing for petroleum hydrocarbons before dewatering is performed at any airport site. Treatment would be applied, in consultation with the RWQCB and/or wastewater treatment plant operators to ensure that all discharges meet applicable quality requirements."

As noted above, the Construction General Permit was revised in 2009 to include more specific requirements related to non-storm water discharges. SFO has subsequently developed the TIG and 2011 SWPPP for Construction Activities, which specifically address additional requirements related to discharges of groundwater during construction activities. These requirements are more comprehensive and considered more efficacious than the specified FEIR Mitigation Measures I.E.1.b and I.F.1.k, and their implementation would not alter the impact conclusions reached in the FEIR. Further, because compliance with these requirements is enforced through CCSF Contract Specifications and on-site SFO construction inspectors, the requirements of FEIR Mitigation Measures I.E.1.b and I.F.1.k would be implemented through compliance with the SFO SWPPP and the Construction General Permit. Therefore, discharge of groundwater produced during excavation dewatering at Plot 2 would not cause a violation of water quality standards or otherwise degrade water quality and construction of the modified hotel project would not result in any new significant effects during construction beyond those identified in the FEIR or substantially increase the severity of a significant impact, and no new mitigation measures would be required.

Given the Plot 2 project site is currently paved and storm water drains to the SFO water collection system, post-construction conditions would not contribute additional runoff that would exceed the capacity of existing or planned storm water drainage systems. There would be no change in the type of storm water flows from the site, or an alteration of drainage patterns that could result in substantial erosion, siltation, or flooding on- or off-site. The modified hotel project site is not in an area subject to in inundation by seiche, tsunami, or mudflow. In addition, the modified hotel project site is not located within a flood hazard zone identified on the 2008 preliminary FIRM for San Mateo County.

Therefore, the modified project, including the modified hotel project, would not result in any new or substantially greater impacts to hydrology and water quality beyond those identified in the FEIR. The modified hotel project would be constructed in the same location as development analyzed under the FEIR. Other Master Plan projects and cumulative projects constructed at SFO would be subject to SFO's NPDES permit requirements for discharges from the wastewater treatment plant, and projects larger than one acre would be required to prepare a SWPPP for construction-related activities. Therefore, the

[39] General Waste Discharge Requirements for Discharge and Reuse of Extracted and Treated Groundwater Resulting from the Cleanup of Groundwater Polluted by Fuel Leaks and Other Related Wastes at Service Stations and Similar Sites.

contribution of the modified project, including the modified hotel project, to potential cumulative impacts on hydrology and water quality would not be cumulatively considerable.

Hazards and Hazardous Materials

Hazards and hazardous materials impacts of SFO's Master Plan projects are analyzed on pp. 201 to 227 and pp. 381 to 393 of the FEIR. The FEIR determined that several impacts related to exposure to hazardous materials were potentially significant, but would be reduced to a less than significant level with implementation of the mitigation measures specified in the MMRP for the FEIR. As discussed in the FEIR, pp. 390 to 392, expansion of Airport facilities would be anticipated to require the use of additional hazardous materials, similar to the types of materials currently in use including maintenance chemicals, motor vehicle fuel and aircraft fuel. The modified hotel project would be operated in in accordance with federal, state, and San Mateo County hazardous materials storage and handling regulations would not result in any new or more severe impacts than evaluated in the FEIR.

As discussed in the FEIR, construction of airport facilities has the potential to encounter contaminated soil and groundwater, underground tanks and/or fuel lines during excavation and grading activities. Exposure to contaminated materials could cause adverse effects to construction workers, the public or the environment. However, since certification of the FEIR, substantial soil and groundwater cleanup at SFO has occurred under various RWQCB cleanup orders. As a result, the subsurface site conditions at the modified hotel project site would be no worse, and likely improved, compared to conditions reported in the FEIR.

Construction of the modified hotel project would require the limited use of hazardous materials, such as fuels, lubricants, and solvents. Although spills and leaks of hazardous materials could occur during construction, implementation of construction BMPs required by the RWQCB through its review and approval of the SWPPP would reduce the potential for accidental releases and ensure quick response to any spills to minimize impacts to the environment. Any hazardous materials would be stored, handled, and used in accordance with applicable regulations. In addition, implementation of the following FEIR Mitigation Measures during construction of the modified hotel project would ensure that hazard impacts would be less than significant, consistent with the findings in the FEIR: **FEIR Mitigation Measures I.F.1.a, Site Investigation, FEIR Mitigation Measure I.F.1.b, Remediation Activities; FEIR Mitigation Measure I.F.1.c, Safety and Health Plan; FEIR Mitigation Measure I.F.1.e, Review of Reports; FEIR Mitigation Measure I.F.1.f, Remediation Report; FEIR Mitigation Measure I.F.1.i, Excavation; FEIR Mitigation Measure I.F.1.j, Procedure for Locating Underground Obstructions;** and **FEIR Mitigation Measure I.F.1.k, Groundwater Testing.** These mitigation measures require: a site investigation in areas with known or suspected soil and/or groundwater contamination; remediation activities if the site investigations reveal the presence of contaminants in soil and/or groundwater; preparation of a site specific safety and health plan for hazardous materials and waste operations if contamination is found on site**;** submittal of all site remediation reports to the RWQCB if contamination is found on site; reduction of excavation in areas of suspected contamination by performing a site investigation; development of procedures for locating underground tanks, utility lines and fuel distribution pipes; groundwater testing

for petroleum hydrocarbons before dewatering is performed and application of treatment as prescribed by the RWQCB.

Therefore, with implementation of the mitigation measures outlined above, the modified project, including the modified hotel project, would not result in new significant effects beyond those identified in the FEIR or substantially increase the severity of a significant impact, and no new mitigation measures would be required. The modified hotel project would be constructed in the same location as development analyzed in the Master Plan FEIR. Cumulative developments larger than one acre in size would also be subject to RWQCB review through its review and approval of the SWPPP, and all cumulative projects would be subject to applicable regulations of hazardous materials. The contribution of the modified project, including the modified hotel project, to potential cumulative impacts related to hazards and hazardous materials would not be cumulatively considerable.

Other Environmental Topics

The FEIR determined that for the following topics, any environmental effects associated with implementation of the plan would be less than significant: Land Use and Plans, Population, Utilities and Public Services (including Recreation), and Energy and Resources (Minerals and Energy). For all of these topics, the modified project, including the modified hotel project, would not result in any new significant effects beyond those identified in the FEIR or substantially increase the severity of a significant impact, and no new mitigation measures would be required, as further described below.

Land use impacts of the Master Plan were analyzed on pp. 78 to 124 and pp. 250 to 264 of the FEIR. The FEIR determined that the Master Plan would not alter the land use types at the Airport; rather the Master Plan would intensify and/or consolidate existing land uses. Plot 2 was developed with a hotel from 1958 to 1999 and is currently occupied by an Airport employee parking lot, greenhouses, and an information technology data center. The Master Plan calls for commercial hotel development on the site. Redevelopment of the site with a hotel and AirTrain station under the modified hotel project would not physically divide an established community, substantially change the existing character of the project vicinity, or conflict with applicable land use plans or policies. Therefore, the modified project, including the modified hotel project, would not result in any new or substantially greater impacts to land use beyond those identified in the FEIR. The contribution of the modified project to potential cumulative impacts to land use would not be cumulatively considerable.

Population and housing effects of the Master Plan were analyzed on pp. 228 to 231 and pp. 394 to 399 of the FEIR. The FEIR determined that there would be adequate housing in San Francisco and San Mateo counties to accommodate permanent and temporary construction employees. The modified hotel project would does not include a hotel at the International Terminal and includes a smaller hotel at the Plot 2 site than analyzed in the FEIR, reducing the number of hotel employees from 300 workers (as analyzed in the FEIR) to between 180 and 231 full-time workers. There would be no increase in the number of passengers or aircraft operations at the Airport as a result of the modified hotel project. The modified hotel project would be developed on Airport property at a former hotel site currently used for Airport employee parking. Substantial population growth would not occur as a result of construction of the modified hotel

project because of the large existing construction labor pool present in the San Francisco Bay Area. Therefore, the modified project, including the modified hotel project would not result in any new or substantially greater impacts to population and housing beyond those identified in the FEIR. The contribution of the modified project to potential cumulative impacts on population and housing would not be cumulatively considerable.

Utilities and Service Systems setting and impacts of the Master Plan were analyzed on pp. 232 to 236 and pp. 400 to 404, of the FEIR. The FEIR determined that adequate Airport infrastructure existed to accommodate forecast growth demand for utility demand, including water and wastewater systems (sanitary and industrial), and utility providers would be able to supply the forecast demand. In 2010, SFO consumed 459 million gallons of water (or about 1.25 mgd), which is about 43 percent less than projected in the FEIR.[40] The San Francisco Public Utilities Commission's (SFPUC) 2010 Urban Water Management Plan[41] considers SFO a "retail customer" and predicts water demand for the SFO service area will be met in the foreseeable future. The MLTP has a dry weather capacity of 3.3 mgd for the sanitary plant, and the industrial plant has dry weather capacity of 1.2 mgd and a wet weather capacity of 1.7 mgd. The current average flows for the two sub-plants are approximately 0.8 mgd and 0.65 mgd, respectively; therefore the MLTP has adequate capacity to serve the modified hotel project. The modified hotel project would alter portions of the existing on-site storm water drainage system, but would not substantially change overall Airport drainage patterns. The contractor would be required to comply with federal, state, and local requirements and guidelines to meet water quality objectives for water discharge, including the Construction General Permit, the RWQCB Basin Plan, and the SFO SWPPP. Also, construction debris and operational solid waste demand from the modified hotel project would be adequately served by the Altamont Landfill, and SFO would continue to comply with solid waste statutes and regulations for its ongoing operations. Therefore, the modified project, including the modified hotel project, would not result in any new or substantially greater impacts to utilities and service systems beyond those identified in the FEIR. The contribution to potential cumulative impacts on utilities and service systems would not be cumulatively considerable.

Public Services (including Recreation) setting and impacts of the Master Plan were analyzed on pp. 237 to 241 and pp. 405 to 406, of the FEIR. The FEIR determined that the Airport Bureaus of the San Francisco Fire Department (SFFD) and the San Francisco Police Department (SFPD) would need to increase staffing levels to maintain emergency response times due to the increases in passenger forecast and the proposed construction projects under the Master Plan. All new fire and police stations and staffing levels proposed as part of the Master Plan and evaluated in the FEIR have been completed and are currently staffed to

---

[40] SFEP issued a Categorical Exemption under CEQA for an independent and separate project to upgrade the existing primary and secondary treatment of industrial and first flush wastewater to provide more efficient and effective treatment. A new tertiary treatment system would also be installed to reuse wastewater for California Code of Regulations Title 22 uses at the Airport (e.g., landscaping, domestic flushing, mechanical cooling, etc.). San Francisco International Airport, *Industrial Wastewater Treatment Plant Upgrade*, Categorical Exemption approved by the Planning Department on March 4, 2013. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2013.0235E.

[41] San Francisco Public Utilities Commission, *2010 Urban Water Management Plan*, June 2011. Available at: *http://www.sfwater.org/Modules/ShowDocument.aspx?documentID=1055* Accessed October 2013. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2013.0235E.

meet local, state, and federal guidelines with respect to required response times for emergencies. While the FEIR concluded that build out of the Master Plan projects would increase the need for police and fire services because of the forecast increase in passenger activity, SFPD and SFFD stations and staffing has since been increased. Further, the modified hotel project does not include a hotel at the International Terminal and includes a smaller hotel at the Plot 2 site than analyzed in the FEIR. Thus the increased demand for fire and police protection resulting from the modified hotel project would not exceed that anticipated in the FEIR. Regarding recreation, the modified hotel project would not include dwelling units or residents who would increase the use of neighborhood parks or playgrounds, the nearest of which is Marina Vista Park, 0.09 miles southwest of the Airport in the City of Millbrae. Therefore, the modified project, including the modified hotel project would not result in any new or substantially greater impacts to public services (including recreation) beyond those identified in the FEIR. The contribution to potential cumulative impacts to public services would not be cumulatively considerable.

Mineral and Energy Resources setting and impacts of the Master Plan projects were analyzed on pp. 178 to 182 and pp. 366 to 370 of the FEIR. Construction energy usage is discussed generally on p. 366; energy use from operation of buildings and facilities are analyzed on pp. 367 to 369. Energy plans, policies, and regulations related to the California Building Energy Efficiency standards are described on p. 181 of the FEIR. The FEIR determined that while demolition of outdated and inefficient buildings/facilities would partially offset the increase in energy use, increased electrical capacity (in the form of a new power substation) would be needed to accommodate the long term forecast energy use. Pacific Gas and Electric (PG&E) has since constructed a new substation to provide for increased capacity to transmit electricity from the SFPUC to the Airport. The FEIR included construction and operation of two hotel projects; however, the modified hotel project does not include a hotel at the International Terminal and includes a smaller hotel at the Plot 2 site than analyzed in the FEIR. With LEED Gold design and construction standards incorporated, construction and operation of the modified hotel project would not substantially increase resources used at the Airport or reduce the amount of fuel, water, or energy available regionally (see prior discussion of energy efficient green building features). Lastly, the modified hotel project would be developed on existing Airport property and would have no impact to state, regional, or locally important mineral resources that are important to the state, region, or locally. Therefore, the modified project, including the modified hotel project, would not result in any new or substantially greater impacts to mineral and energy resources beyond those identified in the FEIR. The contribution to potential cumulative impacts to mineral and energy resources would not be cumulatively considerable.

CONCLUSION

Based on the foregoing, the Department concludes that the analyses conducted and the conclusions reached in the FEIR certified on May 28, 1992, as previously amended through 2010, remain valid, and that no supplemental environmental review is required for the proposed plan modification. The modified project would neither cause new significant impacts not identified in the FEIR, nor result in a substantial increase in the severity of previously identified significant impacts, and no new mitigation measures would be necessary to reduce significant impacts. No changes have occurred with respect to circumstances surrounding the original plan that would cause significant environmental impacts to

which the modified project would contribute considerably, and no new information has been put forward which shows that the modified project would cause significant environmental impacts. Therefore, no supplemental environmental review is required.

DATE February 5, 2014

Sarah Jones, Environmental Review Officer
for John Rahaim, Planning Director

ATTACHMENT A

DESCRIPTION OF SAN FRANCISCO INTERNATIONAL AIRPORT MASTER PLAN ENVIRONMENTAL IMPACT REPORT ADDENDA

THIS PAGE INTENTIONALLY LEFT BLANK

ATTACHMENT A
DESCRIPTION OF SAN FRANCISCO INTERNATIONAL AIRPORT MASTER PLAN ENVIRONMENTAL IMPACT REPORT ADDENDA

Addendum (Case No.[a])	Description
Plot 41 Hardstands (86.638E)	Adopted in April 1995, the East Field Maintenance Hangar development was revised to include construction of hardstands, foundation, and associated infrastructure. (A hardstand is a paved surface with materials designed to be more durable than city streets or freeways, in order to support the weight of heavy equipment such as aircraft and support vehicles.) Implementation of the East Field Maintenance Hangar and the addition of the hardstands were eventually abandoned and remain unbuilt.
New International Terminal (86.638E)	In June 1995, an addendum to the Master Plan EIR was issued for the international terminal building and associated boarding areas A and G. The location and footprint of the international terminal, as proposed in 1995, was determined to be virtually identical to the facility analyzed in the EIR. The international terminal was described in the EIR as a seven story building with three levels of passenger processing, and four levels containing administration office space and a hotel. The building that was proposed in 1995 (and ultimately constructed) was 12 feet shorter than analyzed in the EIR, with five proposed stories instead of seven; the administration office space was reduced to one level (about 40,000 square feet); and the hotel development was removed from the international terminal complex.
McDonnell Road R3 Widening (86.638E)	In August 1995, an addendum to the Master Plan FEIR was issued for widening of North McDonnell Road from two to four lanes. The roadway widening was completed in anticipation of the increased volumes of vehicular traffic forecast as part of the Master Plan program and analyzed in the FEIR. The project widened about 1.4 miles of North McDonnell Road – from San Bruno Avenue to North Link Road.
North Field Area Air Freight Services Facilities (86.638E)	Under the Master Plan FEIR, a new L-shaped cargo facility structure with about 432,000 square feet of space was planned for construction at the existing Federal Express and JAL air freight buildings/facilities. The facility would have been located on North Access Road, immediately west of North Field Road. Under the addendum issued in March 1996, a smaller facility was proposed for construction at the same location as identified and analyzed in the FEIR. The revised project included an air freight building (225,000 square feet), associated administration office (35,000 square feet), and 175 surface parking stalls. About 78,000 square feet of the existing cargo and tenant office facilities in the existing JAL cargo building was to be retained, for a project total of 303,000 square feet of cargo facilities.
Terminal Area Projects (86.683E)	In April 1996, an addendum to the Master Plan FEIR was issued for the terminal area projects. The addendum analyzed two Master Plan project revisions: (1) Relocation of the proposed AirTrain Maintenance Facility from Lot D (located at the intersection of North McDonnell Road and West Area Drive), to an undeveloped site adjacent to the existing Airport Maintenance Building located about a quarter mile south of Lot D on North McDonnell Road; and (2) Construction of the international terminal north and south garages (now known as IT Garage A on the south and IT Garage G on the north) to be located where the rental car facility and consolidated ground transportation center was to be built. The proposed location of the rental car facility was moved to Lot D and was the subject of a separate addendum. The ground transportation center identified in the Master Plan and analyzed in the FEIR was never built.

ATTACHMENT A (CONT.)
DESCRIPTION OF SFO MASTER PLAN ENVIRONMENTAL IMPACT REPORT ADDENDA

Addendum (Case No.[a])	Description
Rental Car Facility and Lot D Replacement (86.683E)	In July 1996, an addendum to the Master Plan FEIR was issued for the subject project. The Rental Car (RAC) facility and Ground Transportation Center was originally identified for construction at the existing terminal roadways. In the addendum, the RAC was proposed for location at the existing long-term parking lot (called Lot D) at the intersection of N. McDonnell Road and West Area Drive. Construction of the RAC displaced about 3,091 existing parking spaces out of the 4,701 parking spaces at the Lot D. (The 4701 parking spaces is a total of the 3,584 long term public stalls plus the 1,117 employee/tenant parking spaces at Lot D.) The RAC would be a five-story parking structure with approximately 1.5 million square feet of parking and staging for about 3,350 cars, and approximately 133,000 square feet of office space and customer lobby space. The fifth floor would provide direct access to the AirTrain system, allowing passengers to access the RAC from the terminal complex. A one-story 55,000 square-foot quick turnaround building consisting of a pre-fabricated canopy over a series of car wash and fueling islands would also be constructed adjacent to the RAC as a support facility to rental car operations.
Elevated Circulation Roadways Project (86.683E)	In September 1996, an addendum to the Master Plan FEIR was issued for an elevated roadway project, which was planned under the Master Plan program to support forecast increases in vehicular traffic. While the project identified in this addendum was virtually identical to that described and evaluated in the FEIR, the addendum was prepared to specifically evaluate the potential impacts of the elevated roadways and other terminal area master plan project activities, as background studies (primarily updating traffic analyses) did not identify environmental impacts substantially different than those analyzed in the Master Plan FEIR.
Emergency Response Facilities #1 and #3 and Police Training Facility (86.683E)	In December 1996, an addendum to the Master Plan FEIR was issued for the subject project, which was a revision to the facility analyzed in the FEIR. The proposed Emergency Response Facilities (ERF) #1 would implement the Crash, Fire and Rescue (CFR) #1 identified in the FEIR. The proposed ERF #3 would be the additional fire station, identified in the FEIR as a necessary project to meet the expansion demands of the Master Plan program while maintaining existing level of service. ERF #3 was proposed to be located in the same location as analyzed in the FEIR (generally at the intersection of S. McDonnell Road and Road R-2). The Police Training Facility would be a combination of the existing police training uses and the multipurpose facility analyzed in the FEIR; both of these facilities are generally located near the U.S. Coast Guard Station by Taxiways Charlie and Romeo. The new combined police training facility increased the usable square footage from 20,000 square feet to 31,000 square feet analyzed in the FEIR.
Plot 7 Employee Parking Garage (86.638E)	In July 1997, an addendum to the Master Plan FEIR was issued for an airport employee parking garage on West Field Road. The 8 ½ story garage has a footprint of about 60,800 square issued and provides for about 1,735 vehicle parking stalls. The garage was a relocation and expansion of a parking garage originally proposed at Lot CC, located immediately west of the international terminal complex. The West Field Road location provided closer proximity to West Field Area tenants and employees, and consolidated various surface lots that were located throughout the area vicinity.
Temporary Concrete Batch Plant (86.638E)	In November 1997, an addendum to the Master Plan FEIR was issued for a temporary, mobile concrete batch plant. The temporary batch plant would be located on a 2.5-acre site owned by the Airport, at 520 South Airport Boulevard. The mobile batch plant operated through 2001 for construction of the airport rail transit system, now known as "AirTrain", and was removed in 2001 after construction completion.

ATTACHMENT A (CONT.)
DESCRIPTION OF SFO MASTER PLAN ENVIRONMENTAL IMPACT REPORT ADDENDA

Addendum (Case No.[a])	Description
West Field Air Freight and Administrative Office Construction (86.638E)	In August 2003, an addendum to the Master Plan FEIR was issued for the subject project (West Field Projects). Under the 2003 Addendum, a total of 472,200 square feet of air freight space and 220,000 square feet of administrative offices were proposed for development at the intersection of N. McDonnell Road and W. Field Road. This represented a net decrease of 13,800 square feet and 6,100 square feet of air freight and administrative offices, respectively, when compared to the Master Plan FEIR. In April 2005, the proposed project was subsequently reduced in scope to a total of 308,600 square feet of air freight space and 55,539 square feet of administrative office space. The ERO determined that the modified project would fit within the size and scope of the 2003 Addendum and that no further environmental review would be required for the further-reduced facility.
Terminals 1 & 2 (2007.1149E)	Under the Master Plan FEIR, the South Terminal (Terminal 1) and the International Terminal (now redeveloped as Terminal 2, a domestic terminal) were to be redeveloped for a combined new total of about 1.5 million square feet of terminal area. In October 2007, an addendum to the Master Plan FEIR was issued for redevelopment of terminals 1 and 2. In the addendum, two design alternatives for redevelopment of Terminal 1 were presented – a Finger Pier alternative that would increase the 1,075,900-square foot terminal to 1,183,500 square feet; and the Modified Linear alternative that would decrease the terminal area to 962,000 square feet. While the layouts were different from the layout described in the FEIR, the ERO determined that the physical layout of the two alternatives did not materially affect the total building square footage or number of gates analyzed in the FEIR and that the 2007 proposal was comparable to the layout analyzed in the FEIR. Construction of Terminal 2 was completed in 2011. Construction of Terminal 1 has been delayed but is anticipated to begin in the near future (within 5 years).
Courtyard 2 Projects (2010.0624E)	Seismic evaluations conducted for the Terminal 2 complex determined that extensive structural upgrading was required and a major earthquake could incapacitate the existing airport traffic control tower (ATCT), which was structurally integrated into the Terminal 2 building. Renovation of the existing terminal and ATCT structures was determined to be financially infeasible. The Federal Aviation Administration conducted a siting study which identified a replacement site in the courtyard immediately adjacent to Terminals 1 and 2, known as Courtyard 2. The Courtyard 2 Projects identified in the July 2010 Addendum included four component activities: the relocation of the ATCT; demolition of ATCT, office, and mechanical space; reconstruction of the connecting corridor between Terminals 1 and 2; and, expansion of restroom and concession space as a part of the Terminal 1 redevelopment. The proposed project equated to an 8,700 square foot increase in building area. The demolished ATCT and Terminal 2 office space would be replaced by facilities of substantially the same size in Courtyard 2, with the exception of the proposed tower shaft, which was necessary because the ATCT cab would no longer be structurally integrated with Terminal 2. Construction of the courtyard 2 projects is ongoing.

NOTE:

a San Francisco Planning Department project case numbers.