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# ADDENDUM TO ENVIRONMENTAL IMPACT REPORT

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| *Date of Addendum:* | September 23, 2020 |
| *Date of EIR Certification:* | May 12, 2016 |
| *EIR Title:* | 901 16th Street and 1200 17th Street Project |
| *EIR Case No.:* | 2011.1300ER |
| *Modified Project Title:* | Permanent Off-Site Flower Mart Project |
| *Modified Project Case No.:* | 2011.1300EIA |
| *Block/Lot:* | 3949/001, 001A, 002 and 3950/001 |
| *Modified Project Sponsor:* | 901 16th St Manager, LLC, Alexandra Stoelzle, 415.778.7776, astoelzle@kilroyrealty.com |
| *Lead Agency:* | San Francisco Planning Department |
| *Staff Contact:* | Alana Callagy, 628.652.7540, alana.callagy@sfgov.org |

## Overview

On May 12, 2016, the San Francisco Planning Commission certified the 901 16th Street and 1200 17th Street Environmental Impact Report (EIR), case no. 2011.1300E (901 16th Street EIR).[1] The 901 16th Street EIR analyzed the demolition of two warehouses and the modular office building and construction of two new buildings on the project site: a six-story, 68-foot-tall (excluding rooftop projections of up to 82 feet), approximately 403,000 gross-square-foot (gsf) residential mixed-use building on the northern lot with 260 dwelling units and approximately 20,000 gsf of retail; and a four-story, 48-foot-tall (with rooftop projections of up to 52 feet), approximately 215,000 gsf residential mixed-use building on the southern lot with 135 dwelling units and 4,650 gsf of retail. The 901 16th Street EIR proposed project is hereafter referred to as the "original project." The 901 16th Street EIR found that the original project would be generally consistent with, and was encompassed within, the analysis in the Eastern Neighborhoods Rezoning and Area Plan EIR (Eastern Neighborhoods PEIR).[2] The 901 16th Street EIR also found that the original project was consistent with the zoning controls and provisions of the San Francisco Planning Code applicable to the project site.[3]

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1 San Francisco Planning Department, *901 16th Street and 1200 17th Street Environmental Impact Report*, Case No. 2011.1300E, State Clearinghouse No. 2015022048, April 2016. This document (and all documents cited in this addendum unless otherwise noted) is available for review on the following website: https://sfplanning.org/resource/permits-my-neighborhood. Individual files related to environmental review can be accessed by entering the project address into the search box, clicking on the blue dot on the project site, and then clicking on the "Documents" button under the ENV application number on the right side of the screen. Project application materials can be viewed by clicking on the "Documents" button under the PRJ case number. The "Filters" function can be used to search by case number.

2 Ibid.

3 Ibid.

Subsequent to certification of the 901 16th Street EIR, 901 16th Street and 1200 17th Street (the "project site") was acquired by 901 16th St Manager, LLC for the permanent new location of the San Francisco Wholesale Flower Market ("Wholesale Flower Market"). The Permanent Off-Site Flower Mart Project (hereinafter the "modified project") would demolish the 5,800-square-foot modular office building, but would retain and reuse all other existing buildings on the project site for use by the Wholesale Flower Market, which would be relocated from 640 Brannan Street (between Fifth and Sixth streets),and is comprised of approximately 60 vendors and 275 employees. This addendum analyzes the proposed relocation of the Wholesale Flower Market to the 901 16th Street site.[4]

The interior of one of the reused warehouse buildings (see no. "4" on Figure 1) would be expanded to include a mezzanine level that would provide views of the first level of the warehouse buildings below and would open to the second level of the parking structure, expanding the total floor area on the project site from approximately 106,100 square feet to approximately 125,000 square feet. The modified project would also construct an approximately 84,900-square-foot parking structure containing 150 parking spaces and 25 truck parking spaces on the site of the existing modular office building and surface parking lot. A modified project variant would expand the parking structure to approximately 102,000 square feet to accommodate approximately 180 parking spaces and 25 box truck parking spaces.

This addendum analyzes the potential physical environmental effects of implementing the modified project and modified project variant. California Environmental Quality Act (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 or supplemental EIR, as provided in CEQA Guidelines section 15162, are not present. Based on the analysis included herein, the modified project would not cause new significant impacts that were not identified in the 901 16th Street EIR; would not result in significant impacts that would be substantially more severe than those identified in the 901 16th Street EIR; and would not require new mitigation measures to reduce significant impacts. No changes have occurred with respect to the circumstances of the modified project that would cause significant environmental impacts to which the project would contribute considerably. In addition, no new information has been put forward demonstrating that the modified project would cause new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts. Therefore, the planning department concludes that the analyses conducted and the conclusions reached in the 901 16th Street and 1200 17th Street EIR certified on May 12, 2016, remain valid, and that no subsequent or supplemental EIR is required for the modified project or modified project variant.

[4] Development of the existing Wholesale Flower Market site was analyzed as Flower Mart Project at 610–698 Brannan Street (Planning Case No. 2015-004256ENV)(see Section B of this addendum for more detail about Case No. 2015-004256ENV).


SOURCE: Google, base, 2020; ESA, 2020

Case No. 2011.1300EIA: Permanent Off-Site Flower Market Project

**Figure 1**
Project Location

# MODIFIED Project Description

## Project Location and Site Characteristics

The 152,000-square-foot project site is located at 901 16th Street on the block bounded by 16th, Mississippi, 17th, and Missouri streets on Assessor's Block 3949, Lots 001, 001A, and 002, and Assessor's Block 3950, Lot 001 (refer to Figure 1). The project site is located within the Potrero Hill neighborhood and the Showplace Square/Potrero Hill Plan Area. As shown in Figure 2, the project site contains four existing buildings:

- A modular office building at 901 16th Street, herein referred to as the "modular office building" (see "1" on Figure 2);
- A brick office building at 1200 17th Street (see "2" on Figure 2);
- A warehouse at 1210 17th Street and 975 16th Street (see "3" on Figure 2);
- An integrated warehouse building at 1200/1100 17th Street (see "4" on Figure 2); and

The warehouse buildings at 1210 17th Street, 975 16th Street, 1200 17th Street, and 1100 17th Street are collectively referred to herein as the "warehouse buildings."

The existing buildings on the project site total approximately 106,100 square feet. The remaining area on the project site is occupied by an approximately 44,200-square-foot surface parking lot.

## Modified Project

On July 3, 2019, the department issued a Community Plan Evaluation and Addendum for the Flower Mart Project at 610–698 Brannan Street (see Planning Case No. 2015-004256ENV), which included analysis of an interim off-site location for the Wholesale Flower Market and identified the possibility that the Wholesale Flower Market might move off-site permanently.[5,6] Following approval of the Flower Mart Project, the Wholesale Flower Market elected on February 10, 2020 to permanently move to a new location at 901 16th Street and 1200 17th Street.

The 901 16th Street EIR analyzed the demolition of two warehouses and the modular office building and construction of two new buildings on the project site: a six-story, 68-foot-tall (excluding rooftop projections of up to 82 feet), approximately 403,000 gsf residential mixed-use building on the northern lot with 260 dwelling units and approximately 20,000 gsf of retail; and a four-story, 48-foot-tall (with rooftop projections of up to 52 feet), approximately 215,000 gsf residential mixed-use building on the southern lot with 135 dwelling units and 4,650 gsf of retail.[7]

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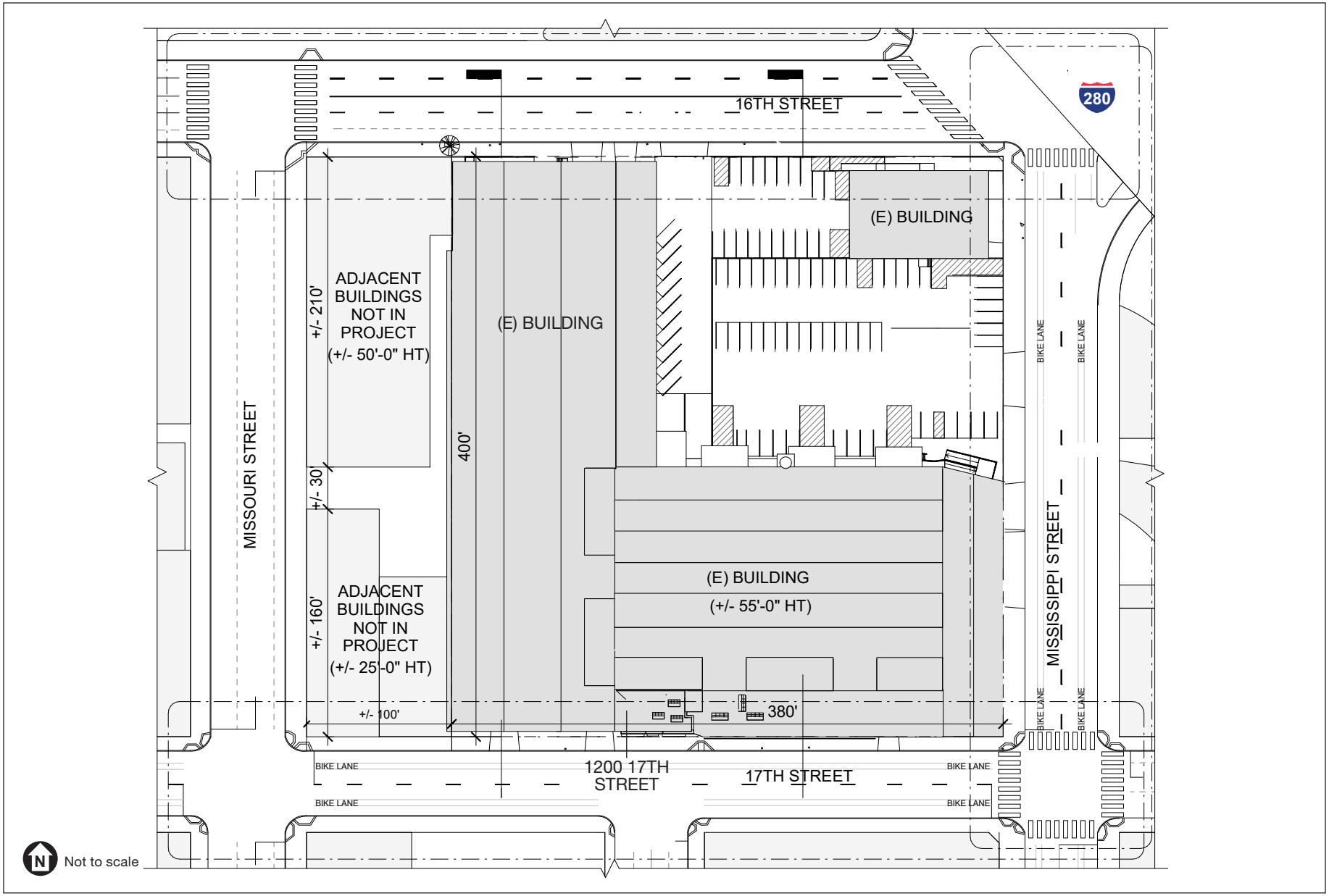
5 San Francisco Planning Department, Attachment A: Initial Study – Community Plan Evaluation Checklist and Addendum to Environmental Impact Report for the Flower Mart Project, https://citypln-m-extnl.sfgov.org/SharedLinks.aspx?accesskey=d3b352a509732e881600006e833d06eed54904fae731f5ddfc4345efdea1da21&VaultGUID=A4A7DACD-B0DC-4322-BD29-F6F07103C6E0, accessed July 12, 2020.

6 The Planning Commission approved the Flower Mart Project on July 18, 2019.

7 San Francisco Planning Department, *901 16th Street and 1200 17th Street Environmental Impact Report*, Case No. 2011.1300E, State Clearinghouse No. 2015022048, April 2016.




SOURCE: Jackson Liles Architecture, 2020

Case No. 2011.1300EIA: Permanent Off-Site Flower Market Project

**Figure 2**
Existing Site Plan

The modified project proposes to merge the four lots into a single lot and demolish the 5,800-square-foot modular office building, while retaining and reusing the three other existing buildings on the project site as the new Wholesale Flower Market (refer to Figure 3 through Figure 6). As shown in Table 1, the existing buildings would be expanded from 106,100 square feet to 125,000 square feet with the addition of a new mezzanine level and would continue to be used for production, distribution and repair (PDR) uses. The modified project would also construct a two-level 84,900-square-foot parking structure containing 150 parking spaces and 25 box truck loading spaces on the site of the existing modular office building and surface parking lot. A modified project

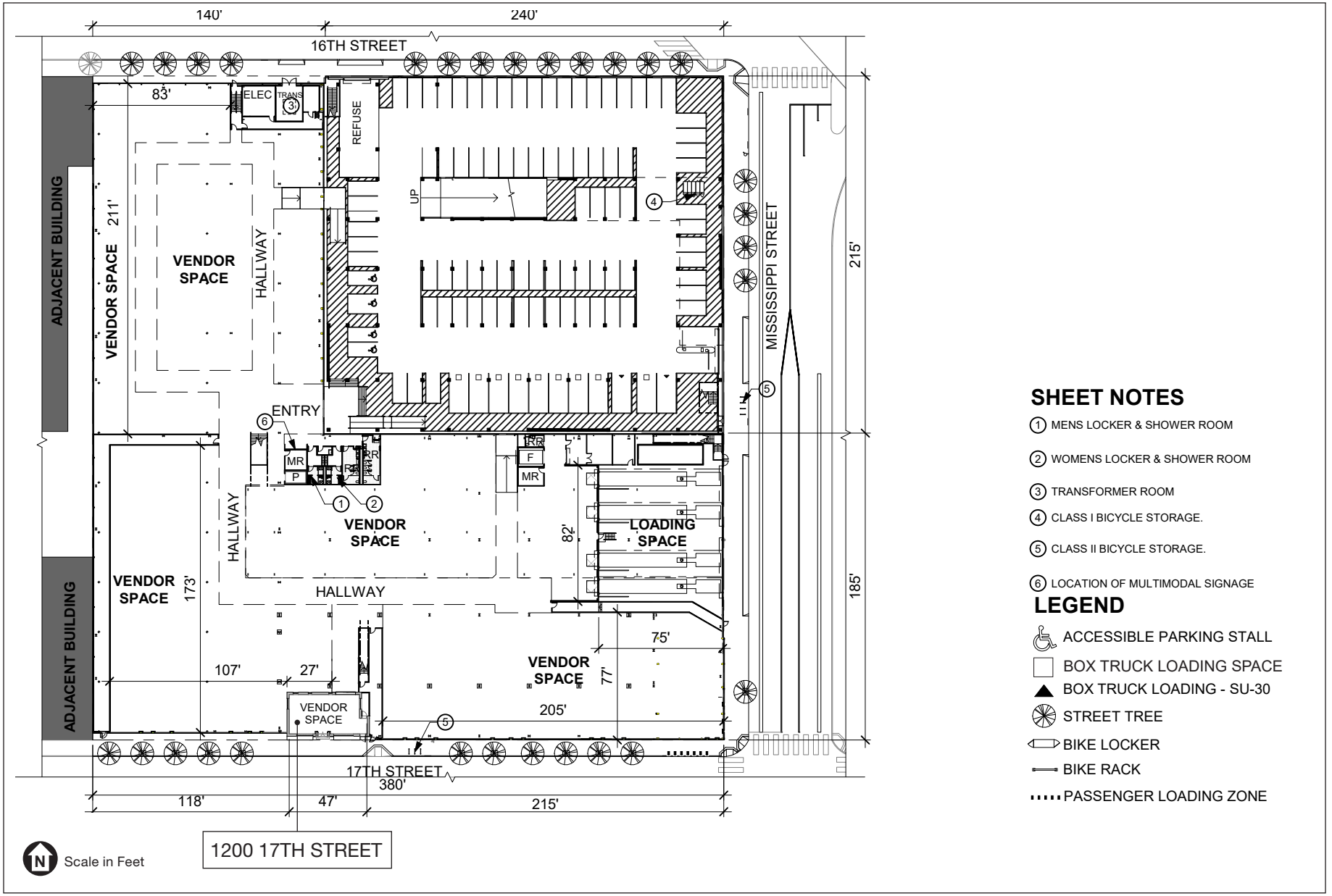
**Table 1 Original Project, Modified Project, and Modified Project Variant Summary**

| | Existing | 901 16th Street EIR | Modified Project | Modified Project Variant |
|---|---|---|---|---|
| Building Area | 106,100 square feet | 617,000 gross square feet | 125,000 square feet | 125,000 square feet |
| Building Use | Office: 5,800 square feet<br>Production, Distribution and Repair: 100,300 square feet | Residential: 395 dwelling units<br>Retail: 25,000 gross square feet | Production, Distribution and Repair: 125,000 square feet | Production, Distribution and Repair: 125,000 square feet |
| Buildings | A modular office building at 901 16th Street (5,800 square feet)<br>A brick office building at 1200 17th Street (approximately 2,600 square feet)<br>A warehouse structure at 1210 17th Street and 975 16th Street (approximately 42,700 square feet)<br>An integrated warehouse structure at 1200/1100 17th Street (approximately 55,000 square feet) | Two residential mixed use buildings totaling approximately 617,000 gross square feet<br>Would preserve the brick building | Warehouse building totaling 125,000 square feet, including the existing brick office building and two integrated warehouse structures | Warehouse building totaling 125,000 square feet, including the existing brick office building and two integrated warehouse structures |
| Maximum Building Height | 60 feet, 3 inches | 68 feet, 6 inches | 60 feet, 3 inches | 60 feet, 3 inches |
| Parking Spaces | 83 | 388 | 150 | 180 |
| Parking Lot Area | 44,200 square feet | n/a | 84,900 square feet | 102,000 square feet |
| Loading Spaces | 10 | 1 | 4 tractor trailer and 25 box truck spaces[1] | 4 tractor trailer and 25 box truck spaces[1] |
| Bicycle Spaces | 0 | 507 (455 class 1 and 52 class 2) | 24 (10 class 1 and 14 class 2 spaces) | 24 (10 class 1 and 14 class 2 spaces) |
| Lockers | 0 | 0 | 24 (12 in the men's locker room and 12 in the women's locker room) | 24 (12 in the men's locker room and 12 in the women's locker room) |
| Showers | 0 | 0 | 4 (two in the men's locker and two in the women's locker room) | 4 (two in the men's locker and two in the women's locker room) |

NOTE:

[1] Only the ground level box truck spaces are for active loading. The upper level box truck spaces are parking spaces designated for box trucks.

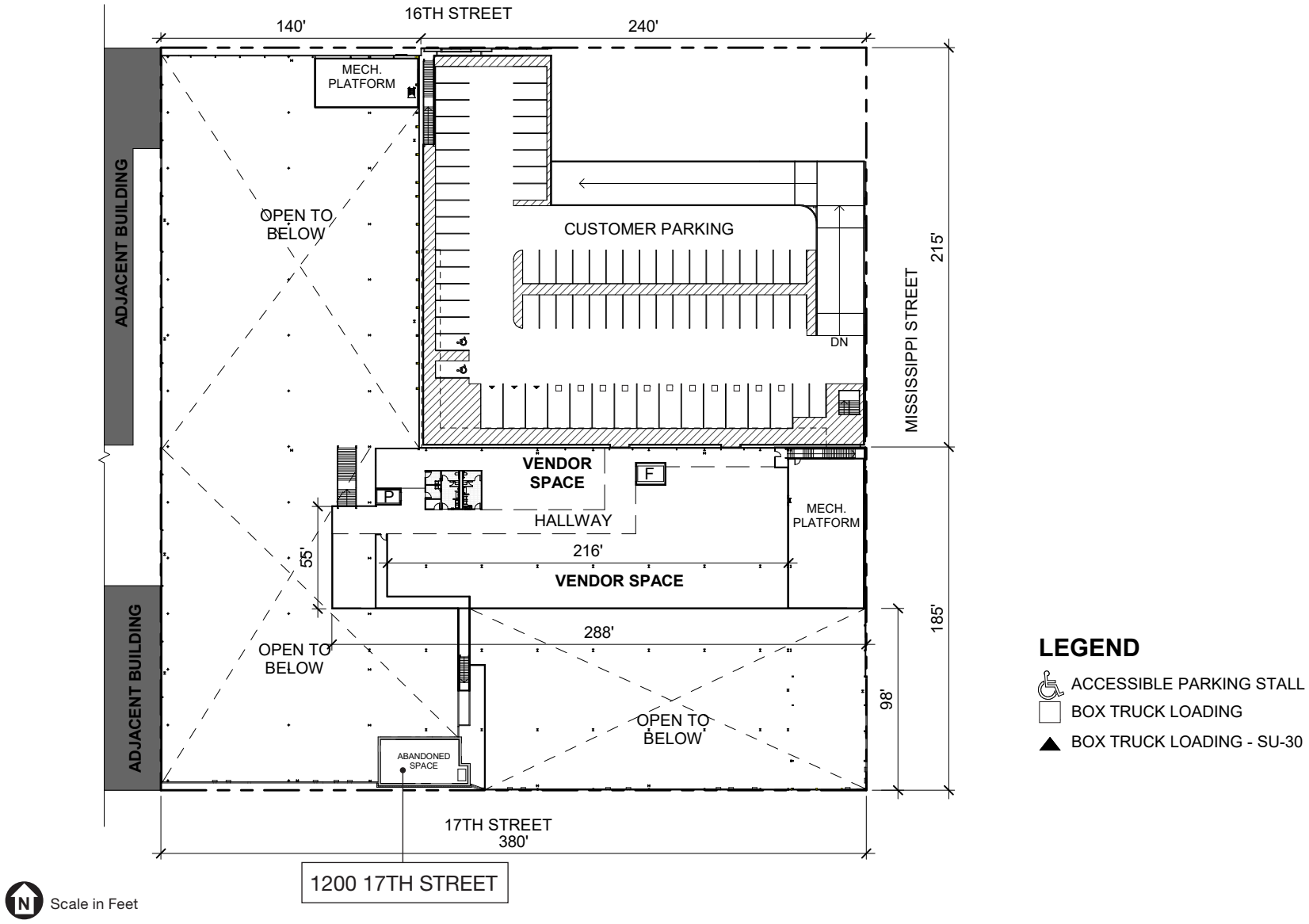
SOURCE: 901 16th St Manager, LLC, 2020




SOURCE: Jackson Liles Architecture, 2020

Case No. 2011.1300EIA: Permanent Off-Site Flower Market Project

**Figure 3**
Proposed Site Plan – Level 1




SOURCE: Jackson Liles Architecture, 2020

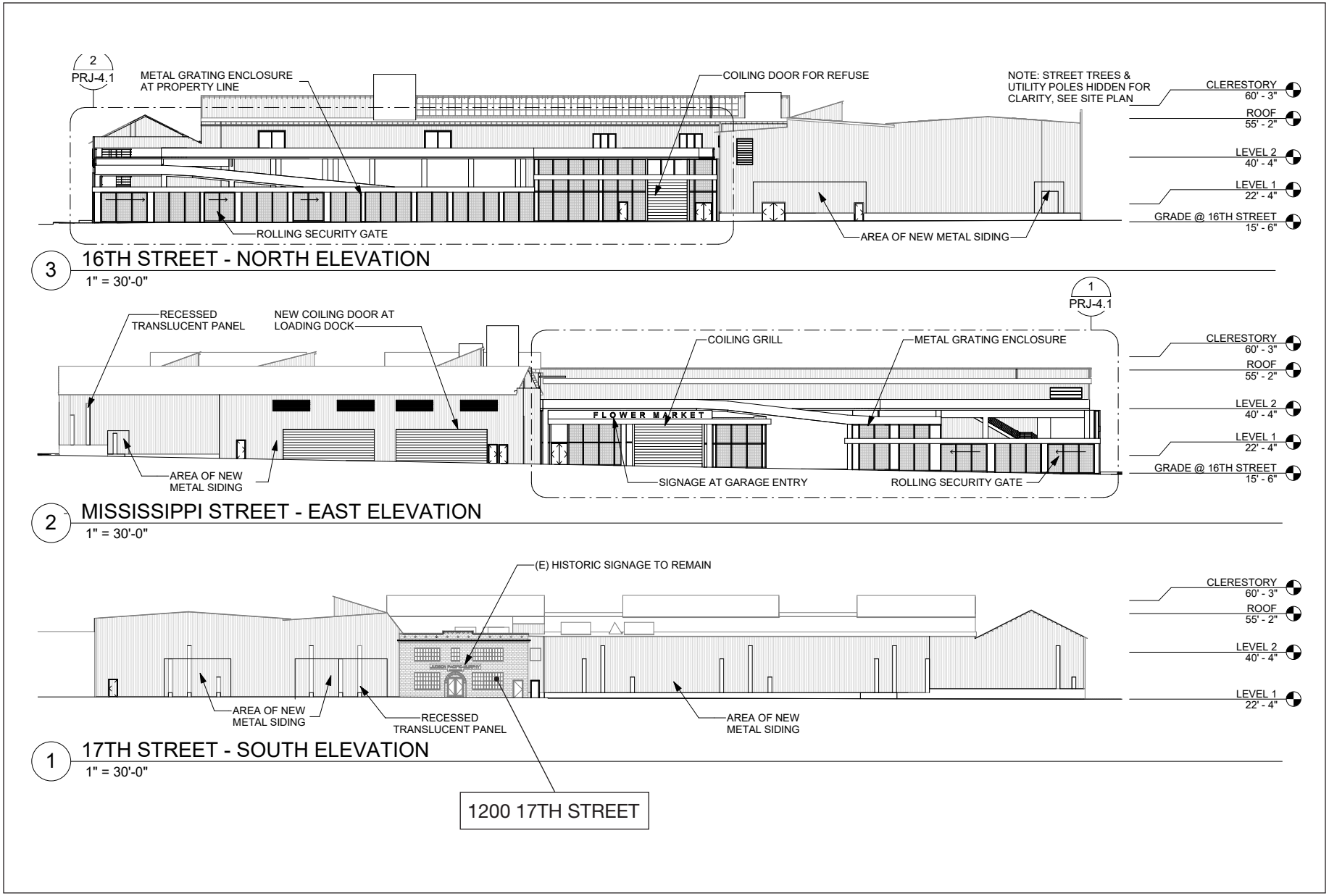
Case No. 2011.1300EIA: Permanent Off-Site Flower Market Project

**Figure 4**
Proposed Site Plan – Level 2


SOURCE: Jackson Liles Architecture, 2020

Case No. 2011.1300EIA: Permanent Off-Site Flower Market Project

**Figure 5**
Conceptual Renderings of Modified Project




SOURCE: Jackson Liles Architecture, 2020

Case No. 2011.1300EIA: Permanent Off-Site Flower Market Project

**Figure 6**
Proposed Cross-Section

variant would expand the parking structure by 17,100 square feet to approximately 180 parking spaces (and 25 box truck spaces) (refer to Figure 7). There are no other differences between the modified project and the modified project variant. The modified project variant is required due to the project sponsor's obligations under the Flower Mart Project development agreement, which was approved by the Board of Supervisors on January 7, 2020 (see Board of Supervisors File No. 190682). Implementation of the modified project variant would be triggered by a request from the Wholesale Flower Market vendors. The development agreement does not provide a deadline by which that request must be made.

As shown in Figure 3, level 1 of the reused warehouse buildings would contain vendor space, four tractor trailer-sized loading spaces along Mississippi Street, men's and women's locker/shower rooms and restrooms, and an electrical transformer room. In addition, under the modified project and modified project variant, 10 class 1 bicycle parking spaces would be provided on level 1 of the proposed parking structure, and 14 class 2 bicycle parking spaces would be provided on sidewalks adjacent to the project site.[8] The modified project proposes to include sliding metal panels within the parking enclosure at the corner of 16th and Mississippi streets to allow for the occasional use of the parking structure for public programming, such as "pop-up" vendors. As shown in Figure 4, level 2 of the reused warehouse buildings would include a partial second level (mezzanine) and would contain vendor space and two mechanical platforms. The partial second level would open to the second level of the parking structure.

In accordance with the San Francisco Green Building Code, the roof of the reused warehouse buildings adjacent to 17th Street would contain solar panels. In addition, two new elevator overrides would extend approximately 12 feet above the existing roof.

**1200 17TH STREET**

The brick office building at 1200 17th Street (historically known as the Pacific Rolling Mill Co. Office) has been determined by the San Francisco Planning Department to be eligible for the California Register of Historic Resources as an individual property under Criterion 1 (Event).[9] The property is not located within the boundaries of a historic district.[10]

The modified project proposes to renovate 1200 17th Street and reuse the building as part of the Wholesale Flower Market vendor space. The modified project would clean and retain the "Judson-Pacific Corporation" cast cement sign above the building entry, which was identified as a character-defining feature of the building.[11] In addition, the modified project proposes to preserve and rehabilitate the distinctive materials, features, and finishes of the primary brick façade and the building's steel-sash windows along the 17th Street façade.

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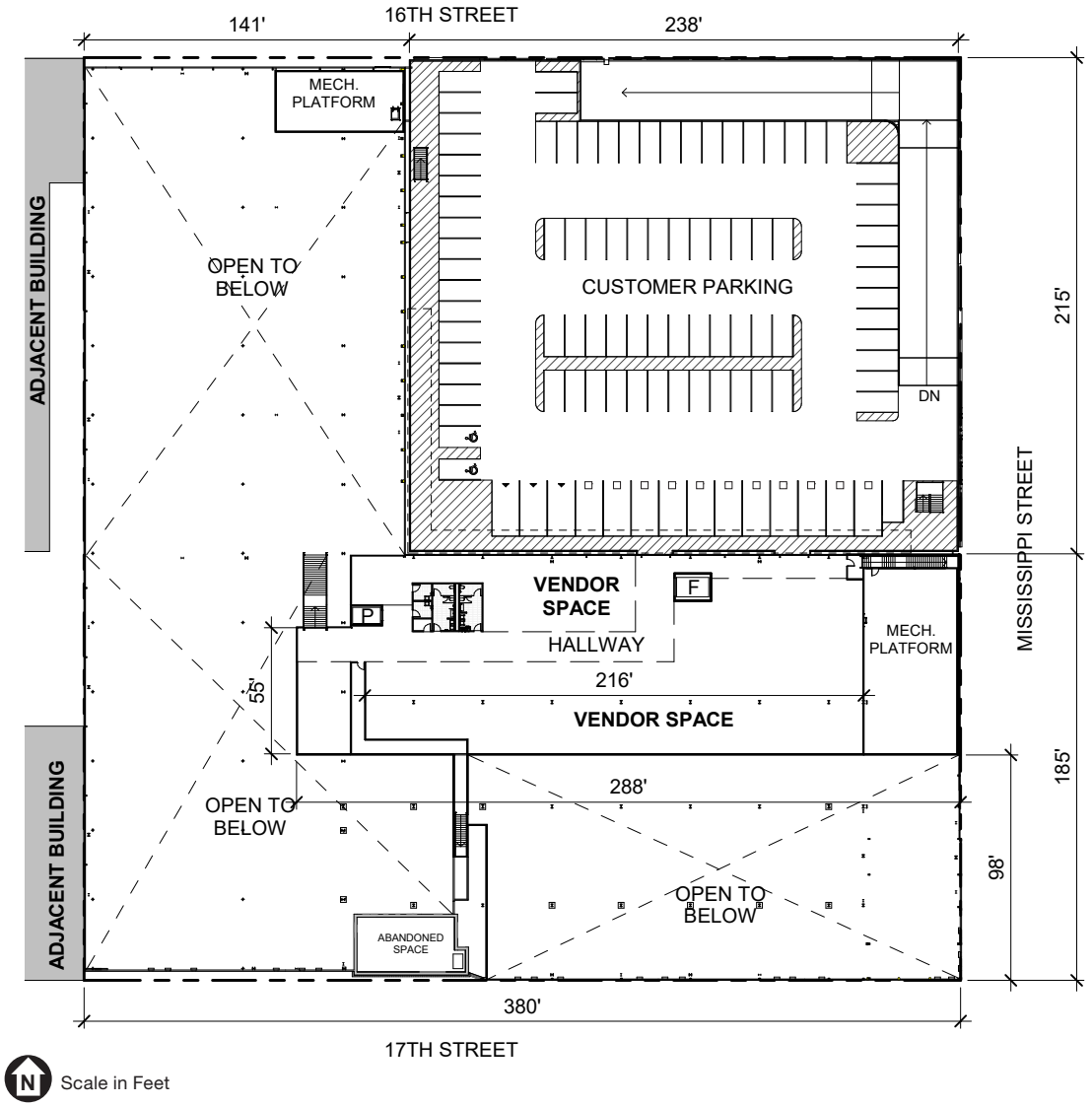
8 Per *San Francisco Planning Code* section 155.1, Bicycle Parking Definitions and Standards, class 1 bicycle parking facilities are spaces in secure, weather-protected facilities intended for use as long-term, overnight, and workday bicycle storage by dwelling unit residents, non-residential occupants, and employees. Class 2 spaces are bicycle racks located in publicly accessible, highly visible locations intended for transient or short-term use by visitors, guests, and patrons to the building or use. Class 2 bicycle racks allow the bicycle frame and one wheel to be locked to the rack (with one u-shaped lock), and provide support to bicycles without damage to the wheels, frame, or components. The placement of the bicycle racks would comply with the San Francisco Municipal Transportation Agency's rack placement guidelines.

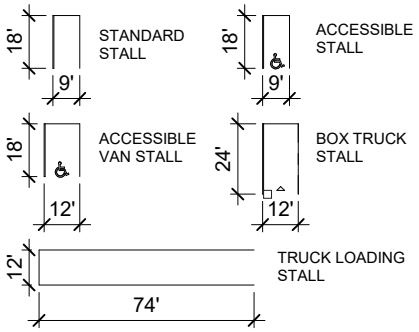
9 San Francisco Planning Department, *Historic Resource Evaluation Response*, 1200 17th Street, May 8, 2013 (Part II).

10 Ibid.

11 Ibid.




## PARKING




## PARKING COUNT

| LEVEL | ACCESSIBLE | STANDARD | |
|---|---|---|---|
| LVL 1 | 3 + 1 VAN | 80 | |
| LVL 2 | 2 | 83 | |
| **TOTAL** | **6** | **163** | **169** |

## LEGEND

- ACCESSIBLE PARKING STALL
- BOX TRUCK LOADING
- BOX TRUCK LOADING - SU-30
- STREET TREE
- BIKE LOCKER
- BIKE RACK
- PASSENGER LOADING ZONE

SOURCE: Jackson Liles Architecture, 2020

Case No. 2011.1300EIA: Permanent Off-Site Flower Market Project

**Figure 7**
Variant - Level 2

Replacement of exterior materials, including repair and refurbishment of the windows, new signage, and new doors, would match the materials used during the building's period of significance. (Although the building was constructed in 1926, the building's period of significance is 1906 to 1928.) All rehabilitation would be undertaken in a manner consistent with the Secretary of the Interior's Standards for Rehabilitation.

The brick building is an unreinforced masonry structure and requires seismic strengthening. Seismic strengthening would consist of concrete shear walls on the structure's interior, strengthening of the floors and roofs with plywood sheathing connected to the exterior walls with new metal brackets, and strengthening of the foundation. The geotechnical report determined that a slab-on-grade foundation would be appropriate for this building.[12]

**PARKING AND LOADING**

As shown in Table 1, the modified project would increase the number of parking spaces on the project site from 83 to 150 by constructing a parking structure on the portion of the project site occupied by the existing modular office building and surface parking lot. The space allotted for parking would increase from the current 44,200-square-foot parking lot to 84,900 square feet with the modified project. The modified project variant would increase the number of parking spaces to 180 and the parking structure to 102,000 square feet. Six parking spaces, three on the first level of the parking structure and three on the second level (with one of the three sized for a van), would be compliant with the Americans with Disabilities Act. These six parking spaces would be provided in approximately the same locations under the modified project and the modified project variant with the exception of the van-sized space which would be located on the first level under the modified project variant.

The current site contains 10 loading spaces. The modified project and the modified project variant would increase the number of truck loading spaces to 11 van or short truck loading spaces on the first level of the two-level parking structure, and four tractor trailer loading spaces within the reused warehouse along Mississippi Street. On the second level of the parking structure, 9 van or short truck and 5 large truck parking spaces would be provided under the modified project and modified project variant. Active loading would be limited to the south side on the first level of the parking structure and at the loading dock.

**BICYCLE PARKING, SHOWERS, AND LOCKER ROOMS**

The modified project and modified project variant would provide a total of 10 class 1 bicycle lockers on level 1 of the parking structure (see "4" in Figure 3). Seven bicycle racks with a capacity to park up to 14 bicycles would be provided on the sidewalk adjacent to the project site along Mississippi and 17th streets (see "5" in Figure 3). In addition, the modified project would provide men's and women's shower and locker rooms, including 12 lockers and two showers in each, under the mezzanine level in southeasterly warehouse building (see "1" and "2" in Figure 3).

**STREETSCAPE AND CIRCULATION**

The modified project proposes to remove on-street parking along Mississippi Street adjacent to and across the street from the project site. The modified project would reconfigure and reuse the existing curb cuts along Mississippi Street for access to the loading dock and the parking structure. On 16th Street, the modified project

[12] Langan Engineering and Environmental Services, Inc., *Geotechnical Investigation, San Francisco Flower Market, 901 16th Street, San Francisco, California*, June 29, 2020.

would reconfigure an existing curb cut to allow access to the electrical transformer room, and would reuse a second existing curb cut on 16th Street to access to the garbage area in the parking structure. Approximately 43 street trees would be planted on streets adjacent to the project site. The project sponsor is coordinating with the San Francisco Public Utilities Commission's Streetlight Services Division to develop a lighting and signage plan that would comply with Planning Code section 138.1.

**CONSTRUCTION**

**SITE GRADING AND PREPARATION**

Construction of the modified project would require up to 6,500 cubic yards of excavation and up to 75,000 square feet of ground disturbance. The existing surface parking lot pavement, lighting, utilities, and modular office building would be demolished and removed. Following excavation of the project site in the parking lot area, the area would then be backfilled using on-site sandy fill as long as the fill is non-hazardous and free of organic material, contains no rocks or lumps larger than 3 inches, and has low to moderate potential for expansion.[13] Underground utilities would then be connected.

**FOUNDATIONS**

The reused warehouse buildings would be supported on a combination of widened shallow foundations and a deep foundation consisting of drilled micropiles. To address anticipated seismic settlement, existing footings would be widened and tied together with grade beams, and micropiles would be installed to depths of 1 to 67 feet below ground surface. The existing shallow-foundation footings that are 3 to 5 feet deep in fill would be widened and tied together with grade beams. Micropiles, which would be 6 to 12 inches in diameter, would be concrete- or grout-filled shafts with steel bars or pipes embedded in the concrete or grout. Micropiles would be drilled to bedrock (bedrock is at depths of 1 to 67 feet below ground surface).

The parking structure would be supported by a shallow foundation with interconnecting grade beams over drilled displacement columns.[14] The ground-floor slab would consist of either a concrete structural slab, slab-on-grade, or flexible pavement. Drilled displacement columns would be installed with depths ranging from 15 to 67 feet.

**CONSTRUCTION SCHEDULE**

Construction of the modified project would occur over approximately 17 months and would consist of one overall phase with six sub-phases: three for the parking structure and three for the existing warehouse building remodel. Construction is anticipated to begin in / December 2020 and end the May 2022. Construction would generally occur on weekdays from 7 a.m. to 3:30 p.m.; if weekend construction is required it would also generally occur between 7 a.m. and 3:30 p.m.

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[13] Langan Engineering and Environmental Services, Inc., *Geotechnical Investigation, San Francisco Flower Market, 901 16th Street, San Francisco, California*, June 29, 2020.

[14] Drilled displacement columns are constructed by drilling an auger into the ground to create a soil shaft that is filled with concrete or another material that remains in the shaft after the auger is withdrawn from the hole. These columns are typically 20–24 inches in diameter.

For the parking structure, construction would begin with demolition and ground improvements for five months; installation of foundation and utilities would last three months; and construction of the columns, deck, and ramp would occur over approximately five months. Improvements to the warehouse buildings would begin with demolition and abatement lasting three months; structural improvements and alterations to the building envelope would occur over seven months; and tenant improvements would last six months.

**TRANSPORTATION DEMAND MANAGEMENT**

Because the modified project would result in 10,000 square feet or more of occupied space of a use other than residential, it would be required to comply with planning code section 169, Transportation Demand Management Program. Compliance with section 169 would require the project sponsor to develop a transportation demand management (TDM) plan describing the strategies the project sponsor would adopt to reduce single-occupancy driving to and from the project site; promote car-sharing; and promote the use of nearby transit, bicycle, and pedestrian facilities to access the project site. Compliance with the modified project and modified project variant's TDM plan would be a condition of approval for the modified project or modified project variant and would be monitored by San Francisco Planning Department staff for the life of the project.[15]

The project sponsor submitted a TDM plan application to the planning department in January 30, 2020, and has agreed to include bicycle parking, showers, and lockers onsite, as well as multimodal wayfinding signage.[16]

**MODIFIED PROJECT APPROVALS**

**SAN FRANCISCO PLANNING COMMISSION**

- Approval of a Large Project Authorization, with exceptions, under Planning Code section 329 for projects entailing the addition or new construction of more than 25,000 gross square feet.
- Approval of a Conditional Use Authorization (CUA) to allow the construction of a public parking garage pursuant to Planning Code Sections 843.41 and 303.
- Adoption of findings of consistency with the San Francisco General Plan and priority policies of Planning Code section 101.1.
- San Francisco General Plan referral for implementation of streetscape improvements.

**SAN FRANCISCO PUBLIC WORKS**

- Approval of a permit to plant new street trees adjacent to the project site.
- Approval of construction within the public right-of-way (e.g., curb cuts, bulbouts).
- Approval of parcel merger map.
- Approval of permits for streetscape occupancy during construction.

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15 *San Francisco Planning Code* section 169 requires that a property owner facilitate a site inspection by the planning department before issuance of a certificate of occupancy and document implementation of the applicable aspects of the TDM plan, maintain a TDM coordinator, allow for department inspections, and submit periodic compliance reports throughout the life of the project.

16 San Francisco Planning Department, *Transportation Demand Management Program Supplemental Application for a TDM Plan*, 901 16th Street, Block/Lot(s) 3949/001, 002 & 3950/001, January 30, 2020.

**SAN FRANCISCO DEPARTMENT OF BUILDING INSPECTION**

- Approval of demolition permits for existing modular office building, grading/excavation permits, and site/building permits for new construction.
- If any night construction work is proposed that would result in noise greater than 5 dBA above ambient noise levels, approval of a permit for nighttime construction is required.

**SAN FRANCISCO MUNICIPAL TRANSPORTATION AGENCY**

- Approval of the placement of bicycle racks on the sidewalks and of other sidewalk and streetscape improvements by the Sustainable Streets Division.
- Approval of special traffic permits for temporary occupancy of streets and sidewalks during construction by the Sustainable Streets Division.
- Approval of construction within the public right-of-way (e.g., bulbouts and sidewalk extensions).
- Approval of designated color curbs as necessary for on-street freight or passenger loading, fire truck access, or other restricted parking for the benefit of Wholesale Flower Market tenants, operators, and customers.

**SAN FRANCISCO PUBLIC UTILITIES COMMISSION**

- Approval of changes to connections to the sewer system, as necessary.
- Approval of an erosion and sediment control plan per San Francisco Public Works Code article 4.1.
- Approval of a post-construction stormwater design guidelines, including a stormwater control plan that complies with the city's 2016 Stormwater Management Requirements and Design Guidelines.
- Approval of any changes to existing publicly owned fire hydrants, water service laterals, water meters, and/or water mains, as necessary.
- Approval of the size and location of any new fire, standard, irrigation, and/or recycled water service laterals, as necessary.

**SAN FRANCISCO DEPARTMENT OF PUBLIC HEALTH**

- Approval of a construction dust control plan per Health Code article 22B.
- Approval of a site mitigation plan in compliance with article 22A of the San Francisco Health Code.

## Project Setting

### 901 16th Street and 1200 17th Street Project

The project site is located in the lower Potrero Hill neighborhood on a 3.5-acre portion of the block bounded by 16th Street to the north, Mississippi Street to the east, 17th Street to the south and Missouri Street to the west. The westerly portion of the block is not part of the project site and contains existing residential (live/work), retail and industrial buildings.

The site is bordered to the north by mixed-use residential buildings, to the west by a mix of commercial and residential buildings, to the south by an empty lot and a one-story commercial building, and to the east by the I-280 and commercial buildings. The project site is approximately 500 feet east of the Connecticut Street and 17th Street stop of the 22 Muni line, approximately 1.3 miles east of the 16th Street Mission BART station, and

approximately 0.2 mile north of the I-280 off-ramp. An elevated segment of I-280 runs northeast of the project site. The Caltrain railroad tracks run parallel to and northeast of 7th Street and Pennsylvania Street beneath I-280.

**Cumulative Development**

CEQA Guidelines section 15130(b)(1)(A) defines cumulative projects as past, present, and probable future projects producing related or cumulative impacts. CEQA Guidelines section 15130(b)(1) provides two methods for cumulative impact analysis: the "list-based approach" and the "projections-based approach." The list-based approach uses a list of projects producing closely related impacts that could combine with those of a proposed project to evaluate whether the project would contribute to significant cumulative impacts. The projections-based approach uses projections contained in a general plan or related planning document to evaluate the potential for cumulative impacts. This project-specific CEQA analysis employs both the list-based and projections-based approaches to the cumulative impact analysis, depending on which approach best suits the resource topic being analyzed.

The specific approach to the cumulative analysis is discussed in each topical subsection of this addendum. This includes projects that have an application on file with the department or have an identified funding source (for public projects).

## CEQA Approach

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 or supplemental EIR, as provided in CEQA Guidelines section 15162, are not present.

This addendum evaluates whether the potential environmental impacts of the modified project and modified project variant are addressed in the 901 16th Street EIR, which was certified on May 12, 2016.[17] More specifically, this addendum evaluates whether the modified project would cause new significant impacts that were not identified in the 901 16th Street EIR; would result in significant impacts that would be substantially more severe than those identified in the 901 16th Street EIR; and whether the modified project would require new mitigation measures to reduce significant impacts. This addendum also considers whether changes have occurred with respect to the circumstances of the modified project that would cause significant environmental impacts to which the project would contribute considerably, or whether new information has been put forward

[17] San Francisco Planning Department, *901 16th Street and 1200 17th Street Environmental Impact Report*, Case No. 2011.1300E, State Clearinghouse No. 2015022048, April 2016.

demonstrating that the modified project would cause new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts.

The 901 16th Street EIR identified significant and unavoidable transportation impacts related to an unacceptable level of service at three study intersections: 17th Street and Mississippi Street, Mariposa Street and Pennsylvania Street, and Mariposa Street and Mississippi Street.[18] The 901 16th Street EIR also found that the original project would result in a considerable contribution to significant cumulative traffic impacts at four study intersections: Seventh Street/16th Street/Mississippi Street, 17th Street and Mississippi Street, Mariposa Street and Pennsylvania Street, and Mariposa Street and Mississippi Street.[19]

This addendum evaluates the potential project-specific environmental impacts of the modified project described above and incorporates by reference information contained in the EIR. This addendum also documents the assessment and determination that the modified project is within the scope of the 901 16th Street EIR and no additional environmental review is required. The following project-specific studies were prepared, or reviews conducted, for the modified project to determine whether the project would result in any significant environmental impacts that were not identified in the 901 16th Street EIR: the Historic Resources Evaluation Response, a preliminary archeological review, a Transit-Oriented Infill Project Eligibility Checklist, a Transportation Technical Memorandum, noise technical analysis, air quality technical analysis, a geotechnical report, and a greenhouse gas (GHG) compliance checklist.

## Evaluation of Environmental Effects

### Cultural Resources

#### 901 16TH STREET EIR FINDINGS

#### HISTORIC ARCHITECTURAL RESOURCES

One historic architectural resource was previously identified within the project site: the brick office building at 1200 17th Street. San Francisco Planning Department staff determined that the building is eligible for listing in the California Register under Criterion 1 (Events) for its association with the Pacific Rolling Mill Co., and the period of significance is 1906–1928. It is also eligible under Criterion 3 (Design/Construction) as a good example of a brick industrial building constructed after the 1906 Earthquake and Fire and one that embodies distinctive characteristics of a type, period, and method of construction, namely a timber-frame brick building constructed in the mid-1920s as the centerpiece of the mill. The period of significance under Criterion 3 is 1926. The brick office building retains sufficient integrity to convey its significance under this criterion.[20] Character-defining features of the brick office building at 1200 17th Street are limited to the building's exterior and include:

- Height and massing, including the stepped parapet on the primary (south) façade;
- Four exterior walls constructed of brick, including the decorative brickwork around the primary entrance on 17th Street and the corbelling at the cornice level of the primary façade;

[18] Ibid.
[19] Ibid.
[20] VerPlanck Historic Preservation Consulting. *Final Historic Resource Evaluation for 1200 17th Street/901 16th Street, San Francisco.* December 4, 2014, pp. 38–43.

- The semi-regular pattern of punched window openings on the primary façade outfitted with multi-lite, steel industrial sashes with operable awning sashes;
- The recessed entry vestibule on the primary façade;
- The cement plaster sign that reads "Judson Pacific-Murphy Corporation;" and
- A roof-mounted wood flagpole.[21]

No other buildings or structures on the project site are considered historic architectural resources, and there is no historic district to which the extant buildings and structures on the project site contribute.

The proposed rehabilitation of the brick office building analyzed in the 901 16th Street EIR was found to be consistent with the Secretary of the Interior's Standards for Rehabilitation. A project that complies with the Secretary of the Interior's Standards is presumed to not cause a substantial adverse change in the significance of a historical resource. Therefore, the 901 16th Street EIR identified a less-than-significant impact on this historic architectural resource, and no mitigation measures were identified.

The brick office building at 1200 17th Street is not located in or adjacent to any designated or potential historic district. One historical resource, the Bottom of the Hill at 1231 17th Street, is located approximately 100 feet southwest of the project site and across 17th Street. Because of the distance of this resource from the project site, the proposed rehabilitation of the brick office building would not directly or indirectly alter the character of the Bottom of the Hill during construction. Therefore, the 901 16th Street EIR identified less-than-significant cumulative impacts on historical resources.

**ARCHEOLOGICAL RESOURCES**

Impacts on archeological resources and human remains were addressed in Appendix A: Notice of Preparation and Community Plan Exemption Checklist of the 901 16th Street EIR, which incorporates the Eastern Neighborhoods PEIR by reference. Pursuant to Mitigation Measure J-2 of the Eastern Neighborhoods PEIR, the San Francisco Planning Department conducted a preliminary archeological review of the project site.[22] The review found that no previous archeological documentation exists, nor are there documented prehistoric archeological sites in the immediate vicinity of the project site.[23] However, potential historic archeological sites dating back to the late 1700s are documented nearby in the Central Waterfront area and localized areas of the southern and western flanks of Potrero Hill.[24] In addition, the review found that the project site may be sensitive for the potential presence of prehistoric resources because of the high density of sites north of Mission Bay in the SoMa area; the optimality of Potrero Point for such sites, given the locational characteristics of many Bay Area shellmound sites; and the abundance of important prehistoric biotic resources at the project site.[25]

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21 Ibid., pp. 46–47. This list postdates the list of character-defining features identified in the Historic Resource Evaluation Response for 1200 17th Street that was prepared by preservation staff on May 8, 2013 (Case No. 2011.1300E).

22 Randall Dean, San Francisco Planning Department, *Environmental Planning Preliminary Archeological Review*, May 9, 2013.

23 Ibid.

24 Ibid.

25 Ibid.

The 901 16th Street Community Plan Exemption Checklist concluded that the potential exists for undocumented prehistoric and/or historic archeological sites to be uncovered during ground-disturbing activities and that significant impacts would be reduced to a less-than-significant level through implementation of Project Mitigation Measure M-CP-1. Project Mitigation Measure M-CP-1 requires an archeological testing program with follow-up as needed and appropriate handling of human remains.

**MODIFIED PROJECT IMPACTS**

**HISTORIC ARCHITECTURAL RESOURCES**

This section is based on a review of the project sponsor's architectural plans dated June 19, 2020,[26] and a memorandum updating the 2014 Historical Resource Evaluation Response consistent with the modified project.[27] Under the modified project, similar to the original project analyzed in the 901 16th Street EIR, the one historic architectural resource on the project site at 1200 17th Street would be rehabilitated in full compliance with the Secretary of the Interior's Standards for Rehabilitation.

Under the modified project, the brick office building at 1200 17th Street would function as an extension of the Wholesale Flower Market vendor space, thereby continuing the building's commercial use and allowing preservation of the building in place. The modified project would retain the building's character-defining features (listed above), which are limited to the exterior. All four existing exterior walls would be preserved, along with the building's height, massing, and fenestration pattern. The modified project includes the preservation, repair, cleaning (e.g., graffiti removal), and/or in-kind replacement of distinctive materials, features, and finishes of the building, including the brick façade materials, cast cement sign, and steel-sash windows. No distinctive materials, features, finishes, or construction techniques would be removed. Some windows and doors in existing openings that are not visible from the public right-of-way on 17th Street (i.e., the north, east, and west façades) would be removed to create new interior openings. New exterior wall-mounted signage would be bolted at mortar joint locations and could be removed and repaired in the future without damaging the historic brick construction.

Historically, the brick office building functioned as a freestanding office building for the industrial facility and was constructed of brick to differentiate it from the surrounding industrial buildings. Under the modified project, the brick building and the two large warehouses on the project site would remain in use, thereby maintaining the spatial relationships of the buildings and the industrial character of the project site. The only new construction would be a multilevel parking structure at the northeast corner of the project site, which would be approximately 160 feet from the brick building at the closest point. If the parking structure were to be removed in the future, the historical resource at 1200 17th Street would remain surrounded by industrial buildings on its north, east, and west sides.

The modified project would comply with the Secretary of the Interior's Standards for Rehabilitation; therefore, the modified project would not result in new significant impacts that were not previously identified in the 901 16th Street EIR, would not result in more severe impacts than those identified in the 901 16th Street EIR, and would not require new mitigation measures.

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[26] Jackson Liles Architecture, architectural drawing set for the San Francisco Wholesale Flower Market, revised June 19, 2020.

[27] San Francisco Planning Department, Historic Resource Evaluation Response Update Memo regarding the Flower Mart permanent relocation site at 901 16th Street and 1200 17th Street (2011.1300EIA), July 30, 2020.

**ARCHEOLOGICAL RESOURCES**

Like the original project as analyzed in the 901 16th Street EIR, the modified project would construct both a shallow and deep foundation consisting of spread footings, slab on grade, and micropiles. The modified project also would involve installation of micropiles up to 76 feet below ground surface.

The preliminary archeological review prepared for the modified project indicates the project site has a high potential for prehistoric resources to be present, and moderate potential for historic resources to be present.[28] Thus, the review recommends archeological testing and monitoring during construction to avoid adversely affecting archeological resources, including prehistoric resources. Therefore, potentially significant impacts would be reduced through implementation of the San Francisco Planning Department's archeological mitigation measure for testing. This mitigation measure, referred to in the 901 16th Street Community Plan Exemption Checklist as Project Mitigation Measure M-CP-1, is identified here as Mitigation Measure CR-1, and would reduce potentially significant impacts to a less-than-significant level. It should be noted that this mitigation measure is revised from the version in the 901 16th Street Community Plan Exemption Checklist based on changes in the San Francisco Planning Department methodology for archeological testing. The mitigation measure, Mitigation Measure CR-1, supersedes Project Mitigation Measure M-CP-1 in the 901 16th Street Community Plan Exemption Checklist.

Mitigation Measure CR-1: Archeological Testing

Based on a reasonable presumption that archeological resources may be present within the project site in locations determined to have moderate or high archeological sensitivity, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of an archeological consultant from the San Francisco rotational Department Qualified Archeological Consultants List maintained by the San Francisco Planning Department archeologist. The project sponsor shall contact the department archeologist to obtain the names and contact information for the next three archeological consultants on the list. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the City's appointed project Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the review officer, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines sections 15064.5(a) and (c).

*Consultation with Descendant Communities:* On discovery of an *archeological site*[29] associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group

[28] Kari Lentz and Sally Morgan, San Francisco Planning Department, *Environmental Planning Preliminary Archeological Review*, July 30, 2020.

[29] The term *archeological site* is intended here to minimally include any archeological deposit, feature, burial, or evidence of burial.

an *appropriate representative*[30] of the descendant group and the review officer shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to offer recommendations to the review officer regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Final Archeological Resources Report shall be provided to the representative of the descendant group.

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

At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the review officer. If based on the archeological testing program the archeological consultant finds that significant archeological resources may be present, the review officer in consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or an archeological data recovery program. No archeological data recovery shall be undertaken without the prior approval of the review officer or the planning department archeologist. If the review officer determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

A. The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or

B. A data recovery program shall be implemented, unless the review officer determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

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

- The archeological consultant, project sponsor, and review officer shall meet and consult on the scope of the archeological monitoring plan reasonably prior to any project-related soils disturbing activities commencing. The review officer in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils-disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the risk these activities pose to potential archeological resources and to their depositional context;

[30] An *appropriate representative* of the descendant group is here defined to mean, in the case of Native Americans, any individual listed in the current Native American Contact List for the City and County of San Francisco maintained by the California Native American Heritage Commission; and in the case of the Overseas Chinese, the Chinese Historical Society of America. An appropriate representative of other descendant groups should be determined in consultation with the planning department's archeologist.

- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;
- The archeological monitor(s) shall be present on the project site according to a schedule agreed upon by the project sponsor, archeological consultant, and the ERO until the review officer has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;
- The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. If in the case of pile driving or deep foundation activities (foundation, shoring, etc.), the archeological monitor has cause to believe that the pile driving or deep foundation activities may affect an archeological resource, the pile driving or deep foundation activities shall be terminated until an appropriate evaluation of the resource has been made in consultation with the review officer. The archeological consultant shall immediately notify the review officer of the encountered archeological deposit. The archeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO.

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

*Archeological Data Recovery Program.* The archeological data recovery program shall be conducted in accord with an archeological data recovery plan. The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the archeological data recovery plan prior to preparation of a draft plan. The archeological consultant shall submit a draft plan to the ERO. The archeological data recovery plan shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the archeological data recovery plan will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.

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

- *Field Methods and Procedures.* Descriptions of proposed field strategies, procedures, and operations.
- *Cataloguing and Laboratory Analysis.* Description of selected cataloguing system and artifact analysis procedures.
- *Discard and Deaccession Policy.* Description of and rationale for field and post-field discard and deaccession policies.

- *Interpretive Program.* Consideration of an onsite/offsite public interpretive program during the course of the archeological data recovery program.
- *Security Measures.* Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities.
- *Final Report.* Description of proposed report format and distribution of results.
- *Curation.* Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

*Human Remains, Associated or Unassociated Funerary Objects.* The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable state and federal laws, including immediate notification of the Office of the Chief Medical Examiner of the City and County of San Francisco and in the event of the medical examiner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission who shall appoint a Most Likely Descendant (Public Resources Code section 5097.98). The ERO shall also be immediately notified upon discovery of human remains. The archeological consultant, project sponsor, ERO, and a most likely descendant shall have up to but not beyond six days after the discovery to make all reasonable efforts to develop an agreement for the treatment of human remains and associated or unassociated funerary objects with appropriate dignity (CEQA Guidelines section 15064.5[d]). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, curation, possession, and final disposition of the human remains and associated or unassociated funerary objects. Nothing in existing state regulations or in this mitigation measure compels the project sponsor and the ERO to accept recommendations of a most likely descendant. The archeological consultant shall retain possession of any Native American human remains and associated or unassociated burial objects until completion of any scientific analyses of the human remains or objects as specified in the treatment agreement if such as agreement has been made or, otherwise, as determined by the archeological consultant and the ERO. If no agreement is reached, state regulations shall be followed including the reburial of the human remains and associated burial objects with appropriate dignity on the property in a location not subject to further subsurface disturbance (Public Resources Code section 5097.98).

*Final Archeological Resources Report.* The archeological consultant shall submit a Draft Final Archeological Resources Report to the ERO that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

Once approved by the ERO, copies of the Final Archeological Resources Report shall be distributed as follows: California Historical Resource Information System Northwest Information Center shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the report to the Northwest Information Center. The San Francisco Planning Department Environmental Planning Division shall receive one bound, one unbound and one unlocked, searchable PDF copy on CD of the report along with copies of any formal site recordation forms (California Department of Parks and Recreation 523 form) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of

the resource, the ERO may require a different final report content, format, and distribution than that presented above.

In summary, with implementation of Mitigation Measure CR-1, the modified project would not result in any impacts related to archeological resources greater than those identified in the 901 16th Street EIR. Moreover, the modified project would not result in new significant impacts that were not previously identified in the 901 16th Street EIR, would not result in more severe impacts than those identified in the 901 16th Street EIR, and would not require new mitigation measures.

#### MODIFIED PROJECT VARIANT IMPACTS

#### HISTORIC ARCHITECTURAL RESOURCES

The modified project variant would have the same less-than-significant impact on the historic architectural resource at 1200 17th Street as the modified project.

#### ARCHEOLOGICAL RESOURCES

Like the modified project, the modified project variant would have a potentially significant impact on archeological resources and human remains that would be reduced to a less-than-significant level through implementation of Mitigation Measure CR-1.

#### CUMULATIVE IMPACTS

As stated in the 901 16th Street EIR, the original project was determined to not contribute to cumulative impacts on historical resources in the vicinity (namely the Bottom of the Hill at 1231 17th Street). Because the modified project and modified project variant would similarly not affect the significance of the Bottom of the Hill, the cumulative impact on historical resources would be less than significant.

Generally, the area for cumulative analysis of archeological resources is the project site where excavation would occur. No other projects would overlap with construction activities at the project site, nor are there any known archeological resources on the project site that extend beyond the boundaries of the project site and could be affected by nearby development. Therefore, impacts of the modified project or modified project variant could not combine with other reasonably foreseeable future projects in the project vicinity to result in a significant cumulative impact on archeological resources or human remains.

### Transportation and Circulation

The discussion of Transportation and Circulation impacts provided below is based on the *901 16th Street Permanent Off-Site Flower Mart Project Addendum to the Transportation Impact Study* prepared in September 2020 and provided in Appendix TRA.[31]

#### 901 16TH STREET EIR FINDINGS

The 901 16th Street EIR identified significant level of service (LOS), also known as automobile delay, impacts at the following four intersections:

[31] Adavant Consulting, 901 16th Street Permanent Off-Site Flower Mart Project Addendum to the Transportation Impact Study, September 16, 2020.

- 7th Street/16th Street/Mississippi Street;
- 17th Street and Mississippi Street;
- Mariposa Street and Pennsylvania Street; and
- Mariposa Street and Mississippi Street.

Two mitigation measures (M-TR-2a and M-TR-2b) were identified to improve LOS at two of the intersections where significant impacts were identified (17th Street and Mississippi Street, Mariposa Street and Pennsylvania Street); no feasible mitigation measures were identified to address impacts at the remaining two intersections where significant impacts would occur (7th Street/16th Street/Mississippi Street, Mariposa Street and Mississippi Street). Due to uncertainty regarding funding of the improvements included in the two proposed mitigations measures, and the lack of feasible mitigation for the other two intersections, significant and unavoidable impacts were identified for all four intersections where significant LOS impacts were identified. Subsequent to the 901 16th Street EIR certification, CEQA was amended to prevent lead agencies from considering intersection LOS in its determination of impacts. Additionally, the planning department adopted the use of vehicles miles traveled (VMT) in its determination of impacts, which was not analyzed in the 901 16th Street EIR. Therefore, this addendum does not discuss automobile delay impacts, but assesses VMT impacts, below.

The 901 16th Street EIR also identified Mitigation Measure M-TR-3c: Implement a Transportation Demand Management Plan to reduce overall travel demand generated by the original project.[32]

The 901 16th Street EIR identified less-than-significant impacts with respect to local and regional transit, conditions for people walking and bicycling, loading and goods movement, and parking. Subsequent to the EIR certification, the department removed transit capacity from the Transportation Impact Analysis Guidelines for Environmental Review (2019 guidelines). This is consistent with state guidance regarding not treating the addition of new transit users as an adverse impact and to reflect funding sources for and policies that encourage additional ridership. Therefore, while the EIR analyzed impacts related to transit capacity, that criterion is no longer relevant.[33]

**MODIFIED PROJECT AND MODIFIED PROJECT VARIANT TRAVEL DEMAND METHODOLOGY AND RESULTS**

For purposes of the analysis, it was assumed that the travel demand for the modified project and modified project variant would be similar to the demand at the existing Wholesale Flower Market site, located at the corner of Sixth and Brannan streets, with one exception. The mode of travel and origin/destination of the employees are adjusted to represent actual transit service and other transportation conditions (e.g., parking supply and utilization) available at the project site, which are different from the existing Wholesale Flower Market site. Mode of travel and trip distribution information for employees at the project site are obtained from the department's 2019 guidelines.

[32] The modified project would be required to comply with the City's TDM Ordinance and, therefore, the Mitigation Measure M-TR-3c identified in the 901 16th Street EIR is not required.

[33] San Francisco Planning Department, Transportation Impact Analysis Guidelines Update: Summary of Changes Memorandum, February 14, 2019, last updated in October 2019.

The transportation analysis for the 901 16th Street EIR assumed person and vehicle travel demand credits to account for existing land uses operating at the project site at that time. Cor-o-van, a moving and storage company, used the existing warehouses and modular office building at the site, and employed approximately 50 people between the hours of 8 a.m. and 5 p.m., Monday through Friday. In addition, the University of California, San Francisco (UCSF) leased a section of the western warehouse building for storage. The surface parking lot was used by Cor-o-van trucks and vans, and to access the UCSF warehouse. Cor-o-van and UCSF employee vehicles and moving trucks accessed the project site from the west side of Mississippi Street (access to the loading docks and parking lot), the south side of 16th Street (access to the parking lot), and the north side of 17th Street (access to the warehouse).

Table TR-1 provides the net change in vehicle travel demand generated by the modified project and modified project variant, taking into account the existing travel demand at the project site. The travel demand credits were based on actual observations of arriving and departing individuals and vehicles collected at the existing project site on August 2, 2012. As shown in the table, the number of net new vehicles generated by the modified project and modified project variant would be 1,849 per day, 173 during the a.m. peak hour, and two during the p.m. peak hour. Table TR-1 also shows that the modified project and modified project variant would generate fewer truck trips than the previously existing uses during both the a.m. and the p.m. peak hours.

**Table TR-1 Modified Project and Modified Project Variant Vehicle Trip Generation Estimate**

| Vehicle Type | Number of Vehicles | | | | | | |
|---|---|---|---|---|---|---|---|
| | Daily | AM Peak Hour | | | PM Peak Hour | | |
| | | In | Out | Total | In | Out | Total |
| **Existing**[1] | | | | | | | |
| Autos, pickups, vans | 92 | 17 | 2 | 19 | 2 | 10 | 12 |
| Box trucks and tractor-trailers | 60 | 1 | 11 | 12 | 3 | 5 | 8 |
| **Total** | **152** | **18** | **13** | **31** | **5** | **15** | **20** |
| **Modified Project/Variant** | | | | | | | |
| Autos, pickups, vans | 1,930 | 111 | 91 | 202 | 11 | 6 | 17 |
| Box trucks and tractor-trailers | 71 | 1 | 1 | 2 | 1 | 0 | 1 |
| **Total** | **2,001** | **112** | **92** | **204** | **12** | **6** | **18** |
| **Net Change in Travel Demand** | | | | | | | |
| Autos, pickups, vans | 1,838 | 94 | 89 | 183 | 9 | -4 | 5 |
| Box trucks and tractor-trailers | 11 | 0 | -10 | -10 | -2 | -5 | -7 |
| **Total** | **1,849** | **94** | **79** | **173** | **7** | **-9** | **-2** |

NOTE:

[1] Based on data collected for the 901 16th Street and 1200 17th Street Mixed-use Project FEIR, Case No. 2011.1300E; Certified May 12, 2016; Data collected on August 2, 2012

SOURCE: DKS Associates, Inc., *901 16th Street/1200 17th Street Potrero Partners, LLC Mixed-Use Project Transportation Impact Study*, March 2015; Adavant Consulting, *901 16th Street Permanent Off-Site Flower Mart Project Addendum to the Transportation Impact Study – Case No. 2011.1300ENV,* Memorandum to the San Francisco Planning Department, August 14, 2020.

COMPARISON TO 901 16TH STREET EIR

Table TR-2 provides the estimated number of a.m. peak hour, p.m. peak hour, and total daily vehicle trips for two vehicle category types: vehicles, pickup-trucks, and vans; and box trucks and tractor-trailers. Since the 901 16th Street EIR does not estimate the number of trips generated during a.m. peak hour, they are calculated in the addendum based on the 901 16th Street EIR's Transportation Impact Study in order to compare the number of trips generated by the modified project and modified project variant to those generated by the original project analyzed in the 901 16th Street EIR. As shown in TR-2, the number of total vehicles generated by the modified project and modified project variant would be substantially less than those estimated in the 901 16th Street EIR, particularly for daily and p.m. peak hour conditions, with over 50 percent reductions. Conversely, the number of trucks generated by the modified project and modified project variant would be approximately 80 percent higher on a daily basis than those generated by the original project analyzed in the 901 16th Street EIR.

**Table TR-2 Modified Project, Modified Project Variant, and 901 16th Street EIR Vehicle Trip Generation Estimate Comparison**

| Vehicle Type | Number of Vehicles | | | | | | |
|---|---|---|---|---|---|---|---|
| | Daily | AM Peak Hour | | | PM Peak Hour | | |
| | | In | Out | Total | In | Out | Total |
| **901 16th Street EIR Project**[1] | | | | | | | |
| Autos, pickups, vans | 4,342 | 118 | 133 | 251 | 291 | 242 | 533 |
| Box trucks and tractor-trailers | 40 | | | | | | |
| **Total** | **4,382** | **118** | **133** | **251** | **291** | **242** | **533** |
| **Modified Project/Variant** | | | | | | | |
| Autos, pickups, vans | 1,930 | 111 | 91 | 202 | 11 | 6 | 17 |
| Box trucks and tractor-trailers | 71 | 1 | 1 | 2 | 1 | 0 | 1 |
| **Total** | **2,001** | **112** | **92** | **204** | **12** | **6** | **18** |
| **Difference** | | | | | | | |
| Autos, pickups, vans | -2,412 | -7 | -42 | -49 | -280 | -236 | -516 |
| Box trucks and tractor-trailers | 31 | 1 | 1 | 2 | 1 | 0 | 1 |
| **Total** | **-2,381** | **-6** | **-41** | **-47** | **-279** | **-236** | **-515** |

NOTE:

[1] Daily and p.m. peak hour volumes are from 901 16th Street and 1200 17th Street Mixed-use Project FEIR, Case No. 2011.1300E; Tables IV.A-7, Tables IV.A-8, and Tables IV.A-9. Estimates of the a.m. peak hour trips were performed specifically for this study, and are included in Appendix TRA.

SOURCE: Adavant Consulting, *901 16th Street Permanent Off-Site Flower Mart Project Addendum to the Transportation Impact Study – Case No. 2011.1300ENV,* Memorandum to the San Francisco Planning Department, August 14, 2020.

## MODIFIED PROJECT IMPACTS

### CONSTRUCTION

The modified project would be constructed in six phases over approximately 17 months (December 2020 to May 2022). Construction would generally occur on weekdays from 7 a.m. until 3:30 p.m.; if weekend construction is required it would also generally occur between 7 a.m. and 3:30 p.m. During the construction period, the number

of construction trucks traveling to and from the site would vary depending on the phase and the type of construction activity. The peak number of construction trucks would occur during the foundation and below-grade construction phase (January 2021 through August 2021), with a daily peak demand of 67 trucks, and an average demand of six trucks per day. The maximum number of construction workers on site would also occur during the same phase with a daily peak demand of 125 workers, and an average demand of 74 workers per day.

Mariposa, Owens, Mississippi, 16th and 17th streets would be used to access the site, and access into the construction site would be from Mississippi Street During project construction there would be additional construction trucks on Mississippi, 16th and 17th streets, all of which are designated bicycle routes; however, bicycle lanes are provided, and construction trucks would not substantially affect bicycle travel, except when entering the site. Construction staging and delivery activities would generally occur on-site, but off-site staging would occur as needed to support parking structure construction; materials and equipment would not be staged on sidewalks. Loading and unloading of materials could occur on 16th, 17th, and Mississippi streets, outside of the bicycle lanes.

Temporary full closure of travel lanes, parking lanes, or sidewalks is not anticipated, except during the reconfiguration of Mississippi Street, which could last up to three weeks. Partial lane and sidewalk closures would be required for curb, gutter, and sidewalk replacement and other planned off-site improvements. People walking would be directed to cross to the other side of the street. No bus stops are located adjacent to the project site. Any temporary traffic lane, bicycle lane, parking lane, or sidewalk closures would be required to be coordinated with City agencies to lessen the effects of the construction-related activities.

The construction contractor would be required to meet the City of San Francisco's Regulations for Working in San Francisco Streets (the Blue Book), including those regarding sidewalk and lane closures, and would meet with San Francisco Municipal Transportation Agency (SFMTA) staff to determine if any special traffic permits would be required. In addition to the regulations in the Blue Book, the contractor would be responsible for complying with all city, state, and federal codes rules and regulations. The project sponsor would be responsible for reimbursing the SFMTA for any temporary striping and signage during project construction.

The 901 16th Street EIR did not identify any significant transportation and circulation impacts related to construction and did not require any mitigation measures. The 901 16th Street EIR included Improvement Measure I-TR-8 Construction Management to develop and implement a construction management plan that minimizes overall construction-related disruptions and ensures that overall circulation in the project vicinity is maintained, to the greatest extent possible. However, compliance with special permits required by the SFMTA and the Blue Book would be sufficient to reduce impacts to less-than-significant levels. Therefore, construction of the modified project would not create potentially hazardous conditions for people walking, bicycling, driving or riding transit; interfere with emergency access; interfere with accessibility for people walking or bicycling; or substantially delay transit. As such, the modified project would not result in significant construction-related impacts related to people walking, bicycling, driving, or taking public transit, and the modified project's impacts related to construction would be less than significant and no mitigation measures are required.

**OPERATION**

POTENTIALLY HAZARDOUS CONDITIONS

The modified project would include the following changes to the street network outside of the project site:

- Improvements to the sidewalk adjacent to the project site, including reconstructed sidewalks. Adjacent to the project site, 16th Street, Mississippi Street, and 17th Street sidewalk widths would retain their existing widths of 10, 15, and 10 feet, respectively.
- Reconfiguration of the existing curb cuts along Mississippi Street for access to the loading dock and the parking structure.
- Reconfiguration of an existing curb cut on 16th Street to allow access to the electrical transformer room; reusing an adjacent second existing curb cut to access to the garbage/recycling/compost area in the parking structure; and elimination of a third existing curb cut.
- Elimination of three existing curb cuts on 17th Street, a designated bicycle route.
- New lane configuration on the portion of Mississippi Street adjacent to the project site in order to provide a two-way center turn lane to facilitate large truck access into and out of the loading dock.
- Safety upgrades to the existing bicycle lanes on Mississippi Street between 16th and 17th streets. The bicycle lanes would be widened to 7 feet and protected from the adjacent parallel traffic lane by a 2-foot wide raised buffer.
- Elimination of existing parallel parking on both sides of Mississippi Street between 16th and 17th streets (approximately 26 spaces).

The modified project would include multiple vehicle access points to the site on Mississippi and 16th streets; however, the modified project would reduce the total amount of curb dedicated to driveways and curb cuts. Overall, the length of curb cut would have a net reduction of 71 linear feet. Inbound and outbound turning maneuvers for tractor-trailer trucks accessing the loading dock and large box trucks accessing the parking structure are shown in Appendix TRA.

The modified project includes implementation of a driveway and loading operations plan (DLOP), including a queue abatement operations plan, to properly accommodate and manage commercial freight loading/unloading activities. Among other measures, the DLOP would include operational and physical measures related to a queue abatement operations plan and provisions to manage loading activities and driveway operations, including on- and off-street loading activities and provision for management of large truck access and trash, recycling, compost collection operations.

**WALKING AND BICYCLING**

The street network changes would enhance the environment and safety for people walking adjacent to the project site on 16th, 17th, and Mississippi streets, and people bicycling along Mississippi Street. The design of the street network changes would generally be consistent with the Better Streets Plan, with the exception of the minimum sidewalk widths on 16th and 17th streets due to space limitations. The modified project would maintain all the existing buildings, except for the modular office, all of which are built to the property line, preventing any setbacks. Similarly, competing infrastructure needs on the roadway, including the provision of

transit-only lanes and bicycle lanes, precludes the existing sidewalks on 16th or 17th streets from being widened. The existing number of people walking in the area is relatively low (about 100 to 200 pedestrians during the peak hour), and the modified project would generate a minimal number of pedestrians (about 20 person trips during the a.m. peak hour and none during the p.m. peak hour). Thus, maintaining the current sidewalk widths on 16th and 17th streets would not create potentially hazardous conditions. Moreover, all street network changes would undergo review by SFMTA's Transportation Advisory Staff Committee (TASC), the fire department, and other city agencies.

The modified elimination of existing curb cuts and the reconstruction of the existing sidewalks, including the planting of approximately 43 trees, would enhance the walking network adjacent to the project site. In addition, widening existing bike lanes on Mississippi Street to 6.5 feet and the provision of a raised 2-foot-wide buffer between moving vehicles and the bike lanes would provide for safer movement of people biking on Mississippi Street.

Pedestrian access to the Wholesale Flower Market would be on Mississippi Street, between the parking structure driveway and the loading dock, and on 17th Street, west of Texas Street. A service/employee entrance would be included next to the loading dock. The parking structure driveway would have an audible and/or visual warning system for people walking as autos, vans and trucks exit onto Mississippi Street. The adjacent four-large truck space loading dock would be managed by an attendant to facilitate inbound and outbound operations.

The project site would be most active during the early morning hours, as vendors, badge holders, and customers arrive and depart the Wholesale Flower Market (typically 4 a.m. to noon). Most of the truck activities at the loading dock would generally occur before 6 a.m., and all trucks typically depart by 9 a.m. In general, there is minimal to no activity at the Wholesale Flower Market after 3 p.m. The expected number of truck trips generated by the modified project during the peak hour of the morning (7 to 9 a.m.) or the evening (4 to 6 p.m.) commute period would be less than the truck trips generated by the uses on the project site in August 2012.

Therefore, the truck maneuvering activities at the loading dock would not typically overlap with people walking during the daytime on Mississippi Street. Peak activity at the Wholesale Flower Market using the parking structure driveway would partially overlap with people walking during the a.m. peak period (7 to 9 a.m.) but not with the p.m. peak period (4 to 6 p.m.). Furthermore, the modified project and modified project variant would generate less truck activity than the August 2012 uses during the a.m. and p.m. peak hours, and people walking in the vicinity of the project site would be exposed to fewer curb cuts and vehicles crossing the sidewalk adjacent to the project site.

Because most of the truck maneuvering activities would occur before 6 a.m., vans, trucks, and other commercial vehicles accessing the parking structure would enter and exit the facility, an audible and/or visual warning system would be installed at the parking structure driveway, and an attendant would be onsite to manage off-street loading spaces and driveway operations. Therefore, operation of the Wholesale Flower Market operations would not create potentially hazardous conditions for people walking.

The modified project would enhance bicycling conditions on Mississippi Street. The conversion of the existing bicycle lanes into wider protected bikeways in both directions on the segment of Mississippi Street between 16th and 17th streets would improve bicycle safety by providing greater separation from parallel moving vehicles compared to existing conditions. The two existing driveways on the west side of Mississippi Street would be

reconfigured in order to provide access to the loading dock and the parking structure. Under the modified project, loading dock activity would typically occur early in the day (generally before 6 a.m.) and the total number of trucks crossing the southbound bike lane during the a.m. or p.m. peak hour would decrease compared to existing conditions. As previously noted, the modified project would implement a DLOP, which would include operational and physical measures manage on- and off-street loading activities in front of the project site on 16th, Mississippi, and 17th streets.

Therefore, for the reasons described above, the modified project would not create potentially hazardous conditions for people walking or bicycling.

**DRIVING AND PUBLIC TRANSIT OPERATIONS**

The modified project's modification of Mississippi Street would accommodate various vehicle types, including trucks and buses, and the modified project have undergone initial review by SFMTA. Final design would be subject to approval by SFMTA, public works, and the fire department to ensure the streets are consistent with City policies and design standards, including the Better Streets Plan, and do not result in traffic hazards for people driving or public transit operators. As shown in Table TR-1, the modified project would add additional vehicles onto adjacent streets during the morning peak hours (a net increase of 173 during the a.m. peak hour) while decreasing the number of vehicle trips during the p.m. peak hour as compared to previously existing conditions; however, increases in vehicles using the roadway are not considered driving hazards.

There are no local or regional bus routes traveling on Mississippi or 17th streets adjacent to the project site. Muni's 55 16th Street operates on 15-minute headways both directions on 16th Street, which includes a westbound exclusive bus/taxi only lane near the project site; UCSF and Mission Bay Transportation Management Association (TMA) shuttle buses also operate on this segment of 16th Street. No public transit stops are located adjacent to the project site.

An existing curb cut on 16th Street would be reconfigured to allow access to the electrical transformer room; a second existing curb cut on 16th Street would be reduce and reused to access to the trash/recycling/compost area in the parking structure; and a third existing curb cut on 16th Street would be eliminated. Vehicular access to the transformer room would be sporadic. Access to the garbage, recycling and compost area would generally occur between 4 and 6 a.m. The modified project's DLOP would include provisions for management of trash, recycling, compost collection operations, such as exiting trucks actively guided by a driveway attendant, so that these activities not interfere with vehicular or public transit operations, or create potentially hazardous conditions.

With the proposed lane reconfiguration on Mississippi Street, the existing on-street parking on both sides of Mississippi Street between 16th and 17th streets (26 spaces) would be removed to provide wider bicycle lanes and a raised concrete barrier and facilitate truck turning movements into and out of the loading dock and the parking structure. This reconfigured street would be designed to City standards and would not create potentially hazardous conditions for people driving on Mississippi Street. As previously noted, the modified project's DLOP would include provisions to manage on- and off-street loading activities in front of the project site on 16th, Mississippi, and 17th streets.

The 901 16th Street EIR analyzed impacts to people walking or bicycling, and concluded that the original project design would not result in traffic hazards for people driving or transit operations. Therefore, no mitigation measures were identified. However, the 901 16th Street EIR did include Improvement Measure I-TR-5a On-site Bicycle Safety Strategies and I-TR-5b On-Street Bicycle Safety Strategies to address potential conflicts between people bicycling and vehicles accessing the project site. These two improvement strategies are no longer applicable to the modified project given the different land uses and proposed street network changes, including reconfiguration of Mississippi Street and the implementation of physically separated bicycle lanes, the installation of an audible and/or visual warning system at the parking structure driveway, and provision of an on-site attendant to manage off-street loading spaces and driveway operations. Therefore, the modified project would result in less-than-significant impacts related to potentially hazardous conditions for people walking, bicycling, driving, or taking public transit, and no mitigation measures are required. Therefore, the modified project would not result in any new or substantially more severe impacts than those identified in the 901 16th Street EIR related to hazardous conditions.

GENERAL ACCESSIBILITY AND EMERGENCY ACCESS

**WALKING AND BICYCLING**

The proposed elimination of existing curb cuts and the reconstruction of existing sidewalks would enhance the pedestrian network adjacent to the project site. The existing striped bicycle lanes on Mississippi Street would be converted into green protected widened bikeways in both directions on the segment of Mississippi Street between 16th and 17th streets, and on-street parking on both sides of the street would be removed, enhancing accessibility as compared to existing conditions. The modified project would include 10 class 1 bicycle parking spaces located within the parking structure at ground level. and the modified project would include 14 class 2 bicycle parking spaces at two bicycle storage areas on the adjacent sidewalks at Mississippi and 17th streets, near the main pedestrian entrances for use by vendors, badge holders, employees, and customers.

**EMERGENCY ACCESS**

The modified project would not introduce any design features or street network changes that would change emergency vehicle travel adjacent to the project site. As such, emergency access routes to the project site would be unchanged. The reconfiguration of the bicycle lanes, elimination of on-street parking, and provision of a two-way center turn lane on Mississippi Street between 16th and 17th streets would reduce the width of the two vehicle travel lanes from 12 to 11 feet, without affecting the maneuverability for emergency vehicles.

Impacts on accessibility, people walking and bicycling, or emergency access were not specifically addressed in the 901 16th Street EIR. However, for the reasons described above, operation of the modified project would result in less-than-significant impacts related to people walking or bicycling to and from the project site and adjoining areas, as well as emergency access; therefore, no mitigation measures are required. As such, the modified project would not result in any new or substantially more severe impacts than those identified in the 901 16th Street EIR related to people walking and bicycling, general accessibility, and emergency access to the project site.

TRANSIT

As shown in Table TR-1, the modified project would generate a net increase of 94 inbound and 79 outbound vehicle trips (a total of 173 vehicle trips) during the a.m. peak hour. During the p.m. peak hour, the modified

project would generate a net increase of seven inbound vehicle trips and a net decrease of nine outbound vehicle trips (a total net decrease of two vehicle trips). The 173 net-new a.m. peak hour vehicle trips generated by the modified project would be less than the 300 total peak-hour project vehicle trips identified by the department as the number of vehicle trips that could cause delays to transit and exceed the 4-minute threshold of significance. Therefore, the modified project would not result in a significant impact related to transit delay.

The main access/egress driveways serving the Wholesale Flower Market would be on Mississippi Street, while access to the electrical transformer room and the trash/recycling/compost area, would be on 16th Street. There are no local or regional bus routes traveling on Mississippi Street adjacent to the project site, while Muni's 55 16th Street, UCSF shuttle buses, and buses operated by the Mission Bay TMA operate on 16th Street. The modified project is designed to accommodate truck turns into and out of the trash/recycling/compost area without interfering with transit operations on 16th Street. The modified project and modified project variant's DLOP includes provisions for properly managing trash/recycling/compost collection operations.

In addition, the modified project would include sufficient on-site vehicle parking to accommodate the expected demand for parking by vendors, badge holders, and customers, as well as for vans and short trucks. The DLOP would include measures to manage loading operations and space occupancy by large box trucks, and tractor trailer trucks at the loading dock, and therefore would not result in double parking or substantially delay transit operations on 16th Street. The modified project does not include on-site vehicular parking for employees. Therefore, the majority of the employee vehicle trips generated by the modified project (18 during the weekday a.m. peak hour, and none during the p.m. peak hour) would seek parking in off-street facilities or would park on the street. This would eliminate potential transit delay caused by employee vehicles queued at entrances to the parking structure.

The 901 16th Street EIR assessed impacts of the original project on Muni transit capacity utilization, and whether the original project would affect transit operations in terms of transit delay or operating costs within the project vicinity, and these impacts were determined to be less than significant. No mitigation measures were required. The planning department no longer considers transit capacity utilization impacts, but rather whether implementation of a project would increase transit travel times and substantially delay transit or create potentially hazardous conditions for transit operations. For the reasons described above, operation of the modified project would not substantially delay transit, and the modified project and modified project variant's impacts related to transit would be less than significant and no mitigation measures are required. Therefore, the modified project would not result in any new or substantially more severe impacts related to transit than those identified in the 901 16th Street EIR.

VEHICLE MILES TRAVELED ASSESSMENT

The existing average daily VMT per capita for the transportation analysis zone (TAZ) in which the project site is located (i.e., TAZ 651) is below the existing regional average daily VMT. Specifically, for the PDR use,[34] the average daily work-related VMT per employee is 12.4, which is about 35 percent below the existing regional average daily work-related VMT per employee of 19.1. Thus, the project site is within an area of the city where the existing VMT per employee is more than 15 percent below the regional VMT thresholds, and would meet the City's map-based

[34] PDR uses are assumed to generate similar VMT as office uses.

screening for PDR projects. As such, the modified project and modified project variant's land uses would not generate a substantial increase in employee VMT. In addition, the project site meets the proximity to transit stations screening criterion, which also indicates that the proposed uses would not cause substantial additional VMT. Finally, the modified project would relocate an existing use of similar size from its current location in the SoMa neighborhood in San Francisco, less than a mile away from the modified project site. As such, the modified project would not result in a substantial increase in VMT.

The modified project would include features that would alter the transportation network. These features include reconstructed sidewalks, elimination of existing on-street vehicular parking, closures and/or relocation of driveways, and enhancement of existing bicycle lanes. These features fit within the general types of projects that would not substantially induce automobile travel.

The 901 16th Street EIR did not analyze impacts related to VMT or substantially inducing automobile travel. However, the modified project would result in less-than-significant impacts related to VMT and induced automobile travel, and no mitigation measures are required. Therefore, the modified project would not result in any new or substantially more severe effects than those identified in the 901 16th Street EIR.

LOADING

**COMMERCIAL VEHICLE LOADING**

The modified project includes four on-site large truck loading spaces with direct access to Mississippi Street. Inside the parking structure, the modified project would also provide five box truck loading spaces, 11 van or short truck loading or parking spaces on the first level of the parking structure, 9 van or short truck parking spaces on the second level of the parking structure, 144 standard automobile/pickup parking spaces, and six Americans with Disabilities Act of 1990 (ADA) parking spaces. Freight loading demand consists of the estimated number of project delivery, service, and passenger vehicle trips. Badge holder and general public parking and commercial vehicle loading data is based on data obtained at the existing Wholesale Flower Market site and on the adjacent on-street spaces, which was collected as part of the environmental clearance for the Flower Mart Project at 610-698 Brannan Street. The employee parking demand data is based on mode of travel and vehicle occupancy data for the project site, obtained from the 2019 guidelines. As detailed in Appendix TRA, the total peak hour commercial loading demand was calculated to be 145 smaller freight vehicles (pickups, vans and short trucks), plus five box truck and three tractor-trailer truck spaces. Based on the supply described above, the modified project and modified project variant's commercial loading demand would be accommodated within the parking structure and loading dock.

**PASSENGER LOADING**

The modified project includes a passenger loading zone on 17th Street in front of the pedestrian entrance with capacity for one vehicle (approximately 25 feet long). This loading zone would be available during Wholesale Flower Market business hours. As noted above, the modified project would also include a DLOP with provision for the accommodation and management of passenger loading/unloading activities at the passenger zone.

As detailed in Appendix TRA, the passenger loading demand for passengers dropped off or picked up by private vehicles, taxis, or transportation network companies (TNCs) (e.g., Uber, Lyft), was estimated at no more than one space during the peak minute of the a.m. peak hour. This demand would be accommodated by the one

passenger loading space to be provided on 17th Street, without the need for double-parking within travel lanes or bicycle facilities.

The 901 16th Street EIR did not analyze impacts related to freight loading and did not require any mitigation measures. The 901 16th Street EIR included Improvement Measure I-TR-6, Off-street Loading Management, to reduce potential conflicts between people walking or bicycling and commercial vehicles accessing the project site. Improvement Measure I-TR-6 included identifying a loading coordinator, coordination of residential move-in, move-out activities, scheduling of large vehicle loading deliveries, and discouraging double parking of commercial vehicles. Most of the loading management strategies identified in the 901 16th Street EIR are no longer applicable given the different nature of the modified project; however, similar measures to minimize conflicts between loading operations and adjacent vehicle, pedestrian, and bicycle travel have been incorporated into the modified project and modified project variant's DLOP (e.g., operational and physical measures related to a queue abatement operations plan and provisions to manage loading activities and driveway operations, including on- and off-street loading activities). Therefore, the modified project would not result in any new or substantially more severe impacts than those identified in the 901 16th Street EIR related to commercial and passenger loading.

**MODIFIED PROJECT VARIANT IMPACTS**

The only physical differences between the modified project and the modified project variant related to the transportation analysis are:

- The modified project variant would provide two fewer standard and 32 additional compact automobile/pickup spaces inside the parking structure.
- The modified project variant assumes that approximately 30 employees would park onsite. Given the additional parking supply provided at the parking structure under the modified project variant, about a third of the employees expected to drive to the Wholesale Flower Market are assumed to park at the site, resulting in a similar parking surplus as under the modified project. As a result, fewer vehicle drivers would seek parking at other off-street facilities or on the street under the modified project variant.

These physical differences would not result in any changes to the impact determinations described above for the modified project. Therefore, the modified project variant would have the same less-than-significant construction and operational transportation impacts as the modified project. As such the modified project variant would not result in any new or substantially more severe impacts than those identified in the 901 16th Street EIR related to transportation and circulation.

**CUMULATIVE IMPACTS**

The transportation cumulative impact analysis for the modified project and modified project variant assesses the long-term impacts of the modified project and modified project variant in combination with other reasonably foreseeable projects. The following summarizes future year modeling and reasonably foreseeable projects relevant to transportation topics.

The cumulative transportation impact analysis in the 2016 FEIR for the 901 16th Street mixed-use project was conducted for future year 2025 conditions, and included land use growth analyzed within the Eastern Neighborhoods Plans FEIR, the Mission Bay Area South Redevelopment Plan/UCSF Mission Bay Medical Center Campus Plan, 1000 16th Street project, and transportation projects including Muni Forward, Bicycle Plan, Muni

Mission Bay Loop, street network changes associated with the Mission Bay, the Mission Bay Loop, and the Caltrain Electrification and High Speed Rail projects.

The cumulative impact analysis for the modified project and modified project variant assesses future year 2040 conditions. The 2040 cumulative conditions analysis incorporates data and forecasts from the City's SF-CHAMP travel demand model outputs in the analysis of VMT impacts. The model is an activity-based travel demand model that the transportation authority calibrates to represent future transportation conditions in San Francisco, accounting for assumptions regarding cumulative infrastructure projects and population growth.

The cumulative conditions analysis for transportation topics other than VMT uses a list-based approach. The geographic context for the analysis of cumulative transportation impacts generally includes the sidewalks and roadways adjacent to the project site, and the local roadway and transit network within 0.5 mile of the project site. The discussion of cumulative transportation impacts assesses the degree to which the modified project or the modified project variant would affect the transportation network in conjunction with overall citywide growth and other cumulative projects.

Development projects considered for the modified project and modified project variant cumulative analysis include 1450 Owens Street, Golden State Warriors Hotel, UCSF Block 34 and SFUSD Block 14. A number of projects near the project site that were considered within the Eastern Neighborhoods Plans have been completed (e.g., 1000 16th Street), are currently under construction (1301 16th Street, 188 Hooper Street, 552 Berry Street/One De Haro Street), or planned such as the Blu Dot furniture store at 99 Mississippi Street (directly west and adjacent to the project site) and the 900 Seventh Street Mixed-Use Project, located approximately one third of a mile to the northwest of the project site.

The cumulative conditions analysis also considers the effects of foreseeable changes to the transportation network. In the project site vicinity Phase 2 of the 16$^{th}$ Street Improvement Project (from Potrero Avenue to Church Street) would start before the end of 2020. Two additional reasonably foreseeable projects within 0.5 mile of the project site include the California High-Speed Rail project, and the Rail Alignment and Benefits study.

CONSTRUCTION

Construction of the modified project and modified project variant could be expected to overlap with two nearby construction projects: 1450 Owens Street in Mission Bay and Phase 2 of the 16th Street Improvement Project. The 1450 Owens Street project (at A Street) and the second phase of the 16th Street Improvement Project between Potrero Avenue and Church Street are not located in the immediate vicinity of the project site. The timing of construction of the proposed Blu Dot furniture showroom and retail store at 99 Missouri Street adjacent to the project site is unknown.

The 901 16th Street EIR did not identify any significant transportation impacts related to construction of cumulative projects. However, given the size and limited number of projects in the immediate vicinity of the project site that could potentially overlap with the modified project and modified project variant construction, construction activities of cumulative projects would not result in significant cumulative construction-related transportation impacts. Therefore, the modified project and modified project variant, in combination with past, present, and reasonably foreseeable development in San Francisco, would result in less-than-significant cumulative construction-related transportation impacts. As such, the modified project and modified project

variant would result in any new or substantially more severe construction-related transportation cumulative impacts than those identified in the 901 16th Street EIR.

OPERATION

**POTENTIALLY HAZARDOUS CONDITIONS**

Under cumulative conditions, people walking, bicycling, or driving on the surrounding street network would increase due to the modified project and modified project variant, as well as other development projects identified above, and growth elsewhere in the city and region. This would generally be expected to lead to an increase in the potential for conflicts between people driving and walking, bicycling, and public transit operations. However, a general increase in cumulative travel by all modes in and of itself would not be considered a potentially hazardous condition. Cumulative projects, including the modified project or the modified project variant, would be designed consistent with City policies and design standards, including the Better Streets Plan; therefore, they would not create potentially hazardous conditions. The 901 16th Street EIR did not identify any significant cumulative impacts related to people walking or bicycling or transit operations. However, for the reasons described above, the modified project and modified project variant would not result in significant cumulative impacts related to potentially hazardous conditions. As such, the modified project and modified project variant would result in less-than-significant cumulative impacts related to potentially hazardous conditions for people walking, bicycling, or driving, or transit operations.

**GENERAL ACCESSIBILITY AND EMERGENCY ACCESS**

Overall, cumulative development and transportation projects would enhance the transportation network for all modes and would promote accessibility for people walking and bicycling within and through the project site area by conforming to the requirements of the Better Streets Plan, Transit First Policy, and Vision Zero. None of the known cumulative projects would impact vehicular circulation in the project site vicinity and would not impede emergency access. The 901 16th Street EIR did not identify any significant cumulative impacts related to people walking or bicycling, and did not analyze cumulative impacts related to emergency access. However, for the reasons discussed above, cumulative projects near the project site would not create impediments to accessibility or circulation for people walking or bicycling, or emergency access. Therefore, neither the modified project nor the modified project variant would result in any new or substantially more severe effects under cumulative conditions than those identified in the 901 16th Street EIR.

**TRANSIT**

SFMTA recently completed Phase 1 of the 16th Street Improvement Project. The improvement project implemented transit-only lanes, transit bulbs, and new vehicle and pedestrian signals on 16th Street from Third Street to Potrero Avenue, adjacent to the project site. Phase 2, from Potrero Avenue to Church Street is scheduled to start before the end of the year and be completed in mid-2022. The two phases of the 16th Street Improvement Project would improve transit reliability and travel time for Muni's 22 Fillmore and 55 16th Street routes and would reduce conflicts between private vehicles and transit vehicles. While these cumulative projects would not substantially affect vehicular circulation or increase a.m. or p.m. peak hour vehicle trips in the vicinity of the project site vicinity as to result in substantial transit delay, increased gate downtimes caused by implementation

of the San Francisco to San José segment of the California High Speed Rail Project would result in a cumulative transit impact on the 22 Fillmore bus services along 16th Street.

As described in the project-level impact analysis, operation of the modified project and modified project variant would not substantially delay transit, and the modified project and modified project variant's impacts related to transit would be less than significant. The 173 net-new a.m. and 3 additional p.m. peak hour vehicle trips generated by the modified project and modified project variant would be less than the 300 total peak-hour project vehicle trips identified by the planning department as the number of vehicle trips that could result in delays for transit and exceed the 4-minute threshold of significance. Furthermore, the modified project and modified project variant would not change gate downtimes at the 16th Street crossing, and therefore would not increase public transit delay for buses traveling on 16th Street, or contribute considerably to the cumulative transit impacts resulting from implementation of the California High Speed Rail Project.

The 901 16th Street EIR did not identify any significant cumulative impacts related to transit delay. However, for the reasons described above, the modified project and modified project variant would not contribute considerably to significant cumulative transit impacts. Therefore, neither the modified project nor the modified project variant would result in any new or substantially more severe effects under cumulative conditions than those identified in the 901 16th Street EIR related to transit.

**VMT ASSESSMENT**

VMT by its very nature is largely a cumulative impact. As discussed above, the modified project and modified project variant would not exceed the project-level quantitative thresholds of significance for VMT. Furthermore, projected 2040 average daily VMT per capita for the TAZ in which the project site is located (i.e., TAZ 651) is below the projected 2040 regional average daily VMT. Specifically, for the PDR use, the projected 2040 average daily work-related VMT per employee is 9.3, which is about 36 percent below the 2040 projected regional average daily work-related VMT per employee of 14.5. Thus, no significant cumulative VMT impacts would occur. Furthermore, it should be noted that the modified project would relocate an existing use within the city. As such, no substantial addition to the commercial vehicle VMT values generated by current Wholesale Flower Market operations would be expected from the modified project or modified project variant.

The 901 16th Street EIR did not analyze impacts related to VMT or substantially inducing automobile travel. However, based on the above, the modified project and modified project variant would result in less-than-significant cumulative impacts related to VMT and induced automobile travel.

**LOADING**

Cumulative development loading activities would be in the vicinity of their respective sites and would not combine with the modified project and modified project variant's loading demand. The modified project and modified project variant's estimated loading demand would be accommodated within the proposed on-site commercial loading spaces and on-street passenger loading zone. No cumulative development projects have been identified that would contribute to either commercial vehicle or passenger loading demand on the project site block. The 901 16th Street EIR did not assess cumulative loading impacts. However, for the reasons described above, no significant cumulative loading impacts would occur as a result of the proposed project and modified

project variant. Therefore, neither the proposed project nor the modified project variant would result in any new or substantially more severe effects under cumulative conditions than those identified in the 901 16th Street EIR.

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## Noise

### 901 16TH STREET EIR FINDINGS

Noise impacts were addressed in Appendix A: Notice of Preparation and Community Plan Exemption Checklist of the 901 16th Street EIR, which incorporates the Eastern Neighborhoods PEIR by reference. The Eastern Neighborhoods PEIR identified potential conflicts related to the presence of residences and other noise-sensitive uses near noisy uses such as PDR, retail, entertainment, cultural/institutional/educational uses, and office uses. In addition, the Eastern Neighborhoods PEIR noted that implementing the Eastern Neighborhoods Area Plans and Rezoning would incrementally increase traffic-generated noise on some streets in the Eastern Neighborhoods plan areas and result in construction noise impacts from pile driving and other construction activities. The Eastern Neighborhoods PEIR identified six noise mitigation measures that would reduce noise impacts to less-than-significant levels. The 901 16th Street EIR found that the original project would not result in either project-level or cumulative significant impacts related to construction or operational noise generation that were not identified in the Eastern Neighborhoods PEIR. The 901 16th Street EIR identified four of the six mitigation measures to address the noise-related impacts.

The 901 16th Street EIR determined that construction activities close to sensitive land uses would result in a potentially significant noise impact, but that this impact would be reduced to less than significant through implementation of Project Mitigation Measure M-NO-2, requiring that site-specific noise attenuation measures be submitted to the San Francisco Department of Building Inspection before the start of construction. In addition, the original project sponsor agreed to implement Project Mitigation Measure M-NO-1, requiring the use of drilled pile installation techniques (instead of pile driving).

The original project as analyzed in the 901 16th Street EIR was also subject to Project Mitigation Measure M-NO-3, which implemented Eastern Neighborhoods PEIR Mitigation Measure F-4, requiring that projects proposing new noise-sensitive uses prepare an analysis to demonstrate that interior noise levels would be consistent with California Code of Regulations, Title 24, (Title 24) standards.

The original project included a backup diesel generator and was subject to Project Mitigation Measure M-NO-4, requiring completion of a detailed noise assessment by person(s) qualified in acoustical analysis and/or engineering before the first project approval action.

Finally, the 901 16th Street EIR found that the original project would not cause a doubling in traffic volumes in the surrounding area, and therefore vehicle trips would not cause a noticeable increase in the ambient noise level in the project vicinity. Traffic noise impacts were determined to be less than significant.

**MODIFIED PROJECT IMPACTS**

## Construction Noise

The nearest sensitive receptors to the project site are multi-family residences in the eastern tower of 1010 16th Street, approximately 80 feet north of the project site. These residences were constructed after preparation of the 901 16th Street EIR.

The duration of construction for the modified project would be seven months shorter than the construction duration of the original project analyzed in the 901 16th Street EIR (approximately 17 months compared to 24 months). Demolition and construction activities analyzed in the 901 16th Street EIR were similar to those for the modified project and would involve drilling piles for the deep foundation system extending to bedrock, instead of pile driving. The modified project would use micropiles and drilled displacement columns for foundation system and no pile-driving would occur. As discussed for the original project in the 901 16th Street EIR, all construction activities for the modified project would be subject to and would comply with the San Francisco Noise Ordinance (article 29 of the San Francisco Police Code). The noise ordinance regulates construction noise, requiring that construction work be conducted in the following manner:

(1) Noise levels of construction equipment, other than impact tools, must not exceed 80 A-weighted decibels (dBA) at a distance of 100 feet from the source (the equipment generating the noise).

(2) Impact tools must have intake and exhaust mufflers that are approved by the Director of San Francisco Public Works or the Director of the San Francisco Department of Building Inspection to best accomplish maximum noise reduction.

(3) If the noise from the construction work would exceed the ambient noise levels at the site's property line by 5 dBA, work must not be conducted between 8 p.m. and 7 a.m. unless the Director of San Francisco Public Works authorizes a special permit for conducting the work during that period.

Although the project sponsor plans for construction to occur during normal daytime hours (8 p.m. and 7 a.m.), certain time-specific construction activities, such as large concrete pours, may require earlier start or later finish times. Construction activities that extend beyond normal hours have not been specifically identified by the project sponsor. Work outside of daytime hours would be subject to review, permitting, and approval by the San Francisco Department of Building Inspection.

The department of building inspection is responsible for enforcing the noise ordinance for private construction projects during normal business hours (8 a.m. to 5 p.m.). The San Francisco Police Department is responsible for enforcing the noise ordinance during all other hours. Nonetheless, during the modified project's construction period of approximately 17 months, construction noise could disturb the occupants of the nearby properties. Noise could interfere with indoor activities in nearby residences and other businesses near the project site and may be considered an annoyance. However, the increase in noise during construction would not be considered a significant impact of the modified project because the construction noise would be temporary, intermittent, and restricted in occurrence and level, as the contractor would be required to comply with the San Francisco Noise Ordinance (article 29 of the San Francisco Police Code).

Consistent with the findings of the 901 16th Street EIR, implementing Project Mitigation Measure M-NO-2 (Construction Noise) would reduce potential construction noise impacts of the modified project to a less-than-

significant level. This mitigation measures referred to in the 901 16th Street Community Plan Exemption Checklist as Project Mitigation Measure M-NO-2, is identified here as Mitigation Measure NO-1.

Mitigation Measure NO-1: Construction Noise (Updating 901 16th Street and 1200 17th Street EIR Project Mitigation Measure M-NO-2)

Prior to issuance of any demolition or building permit, the property owner shall submit a project-specific construction noise control plan to the Environmental Review Officer (ERO) or the ERO's designee for approval. The construction noise control plan shall be prepared by a qualified acoustical engineer, with input from the construction contractor, and include all feasible measures to reduce construction noise. The project sponsor shall ensure that requirements of the construction noise control plan are included in contract specifications. If nighttime construction is required, the plan shall include specific measures to reduce nighttime construction noise. The plan shall also include measures for notifying the public of construction activities, complaint procedures, and a plan for monitoring construction noise levels in the event complaints are received. The construction noise control plan shall include the following measures to the degree feasible, or other effective measures, to reduce construction noise levels:

- Use construction equipment that is in good working order, and inspect mufflers for proper functionality;
- Select "quiet" construction methods and equipment (e.g., improved mufflers, use of intake silencers, engine enclosures);
- Use construction equipment with lower noise emission ratings whenever possible, particularly for air compressors;
- Prohibit the idling of inactive construction equipment for more than five minutes;
- Locate stationary noise sources (such as compressors) as far from nearby noise sensitive receptors as possible, muffle such noise sources, and construct barriers around such sources and/or the construction site;
- Avoid placing stationary noise-generating equipment (e.g., generators, compressors) within noise-sensitive buffer areas (as determined by the acoustical engineer) immediately adjacent to neighbors;
- Enclose or shield stationary noise sources from neighboring noise-sensitive properties with noise barriers to the extent feasible. To further reduce noise, locate stationary equipment in pit areas or excavated areas, if feasible; and
- Install temporary barriers, barrier-backed sound curtains and/or acoustical panels around working powered impact equipment and, if necessary, around the project site perimeter. When temporary barrier units are joined together, the mating surfaces shall be flush with each other. Gaps between barrier units, and between the bottom edge of the barrier panels and the ground, shall be closed with material that completely closes the gaps, and dense enough to attenuate noise.

The construction noise control plan shall include the following measures for notifying the public of construction activities, complaint procedures and monitoring of construction noise levels:

- Designation of an on-site construction noise manager for the project;
- Notification of neighboring residents and non-residential building managers within 300 feet of the project construction area at least 30 days in advance of high-intensity noise-generating activities (e.g., pier drilling, pile driving, and other activities that may generate noise levels greater than 90 dBA at noise sensitive receptors) about the estimated duration of the activity;
- A sign posted on-site describing noise complaint procedures and a complaint hotline number that shall always be answered during construction;
- A procedure for notifying the planning department of any noise complaints within one week of receiving a complaint;
- A list of measures for responding to and tracking complaints pertaining to construction noise. Such measures may include the evaluation and implementation of additional noise controls at sensitive receptors (residences, hospitals, convalescent homes, schools, churches, hotels and motels, and sensitive wildlife habitat); and
- Conduct noise monitoring (measurements) at the beginning of major construction phases (e.g., demolition, grading, excavation) and during high-intensity construction activities to determine the effectiveness of noise attenuation measures and, if necessary, implement additional noise control measures.

For these reasons, implementation of the modified project would not result in significant impacts related to construction noise that were not identified in the 901 16th Street EIR.

**CONSTRUCTION VIBRATION**

Construction of the modified project would not require the use of pile drivers; therefore, construction-related vibration impacts are not anticipated. The modified project would not result in any impacts related to construction noise and vibration that would be greater than those disclosed in the 901 16th Street EIR. Moreover, the modified project would not result in new significant impacts that were not previously identified in the 901 16th Street EIR, nor would it result in more severe impacts than those identified in the 901 16th Street EIR.

**OPERATIONAL NOISE**

Operation of the modified project would eliminate some of the stationary noise sources analyzed in the 901 16th Street EIR. The original project included a backup diesel generator that was considered a noise-generating source; however, the modified project would not include a backup diesel generator. However, like the original project, the modified project would include heating, ventilation and air conditioning (HVAC) equipment. As shown in Figure 4, HVAC equipment would be located on level 2 of the interior of the proposed building and would not be mounted on the rooftop. The mechanical equipment would be fully enclosed and shielded by building walls. As stated in the noise ordinance, no fixed noise source may cause the noise level measured inside any sleeping or living room in a dwelling unit on residential property to exceed 45 dBA between 10 p.m. and 7 a.m., or 55 dBA between 7 a.m. and 10 p.m., with windows open, except where building ventilation is achieved through mechanical systems that allow the windows to remain closed (article 29, section 2909[d] of the San

Francisco Police Code). The nearest residential property is a mixed-use building across 16th Street from the project site. This structure was constructed in the last 10 years, and is equipped with filtration systems allowing the building's windows to remain closed while receiving adequate ventilation. Therefore, because the modified project's HVAC equipment would be shielded by the walls of the building, and buildings across the street are equipped with mechanical systems that allow the windows to remain closed, fixed noise sources proposed by the project would not violate the restrictions of San Francisco Police Code 2909(d). As such, the modified project would not result in any new or more severe impacts than those identified in the 901 16th Street EIR related to stationary noise sources.

Additionally, San Francisco Police Code section 2909(b) establishes a standard maximum of 8 dBA increase over ambient noise levels at the property plane for fixed sources of noise (e.g., building mechanical equipment and industrial or commercial processing machinery) on commercial properties. Long-term noise monitoring conducted on June 17, 2020,[35] indicates that the average nighttime (10 p.m. to 7 a.m.) $L_{90}$ value on the 16th Street property line is 53 dBA (see Appendix NOI)ß. Given this ambient noise level, the applicable noise standard for the commercial property line is an increase of 8 dBA, or an ambient noise level of 61 dBA with implementation of the modified project during nighttime hours.

While some HVAC equipment such as chillers would be acoustically isolated with HVAC/acoustical panels within the machinery room, three primary pieces of HVAC equipment would be located in a central exterior mechanical well. Using sound pressure data in specification sheets for the equipment, the resultant noise level from simultaneous operation would be 65 dBA at 33 feet. The centralized mechanical study indicates that the mechanical well would be approximately 100 feet from the nearest (western) property line of the project site. At this distance, exterior noise levels would be reduced to 55 dBA at the property line, which is below the 61 dBA threshold that represents an increase of 8 dBA over ambient levels. Therefore, noise levels from HVAC equipment would result in a less than significant impact.

The primary operational noise source from the modified project would be truck operations on site (e.g., during loading). Truck operations were not analyzed in the 901 16th Street EIR because that project consisted of a mixed-use residential project with limited truck operations. The modified project would result in on-site routing of Wholesale Flower Market vehicle traffic, including delivery vehicles and trucks, similar to the current routing for the existing Wholesale Flower Market. Trucks are not fixed mechanical equipment; therefore, their on-site operations are regulated by section 2909(b) of the San Francisco Police Code, described below, and not by section 2909(d).

Based on counts and observations of truck activity at the existing Wholesale Flower Market, an average of approximately 17 smaller freight vehicles (typically vans and "box trucks," which are non-articulated trucks) enter and exit the existing Wholesale Flower Market's loading areas each hour during the period of greatest loading

[35] The noise monitoring occurred during a statewide shelter-in-place order associated with the COVID-19 pandemic, which resulted in limited business activities. Therefore, the baseline for comparison of noise impacts from the modified project is the project site and surrounding activity on June 17, 2020, when the project site was vacant. As a result, noise monitoring likely underestimates the contribution to ambient noise levels from historic project site activity, vehicle traffic, and Caltrain operations on the adjacent rail line. Underestimating existing ambient noise level is conservative because a higher applicable noise standard would be anticipated under historic, or "normal" conditions without business restrictions. Therefore, the analysis presented herein is conservative, because it likely overestimates the contribution of noise from the modified project relative to existing ambient noise levels.

activity (between 4 a.m. and 12 noon), with a peak of approximately 23 trucks during the 9 to 10 a.m. hour.[36] A survey of loading activity of vendor freight vehicles indicates that the majority of the activity throughout the day occurs before 12 noon, with 27 vehicles observed at 6 a.m. and 24 vehicles observed at 9 a.m.

Based on data provided by the project sponsor, semi-trailer trucks make approximately three deliveries per day on average, with a maximum of four per day. These semi-trailer trucks typically arrive between 12 a.m. and 6 a.m.

All van or truck traffic, including box trucks arriving at the project site, would enter on Mississippi Street. Vans or box trucks would enter the parking structure and proceed to one of the designated box truck loading spots on the western end of the level 1 parking area. The level 1 parking area is screened and would be shielded from the nearest receptors to the north, across 16th Street. Note that while van and box truck parking spaces are designated on the upper level of the parking structure, those upper level spaces are for longer term parking rather than active loading.

To assess the potential for noise generation caused by increases in truck activity on site (e.g., during loading), truck activity during the peak period was analyzed based on activity levels at the existing Wholesale Flower Market. Article 29 of the San Francisco Police Code defines "ambient" as the lowest sound level repeating itself during a minimum 10-minute period. The minimum sound level is to be determined with the noise source of concern not operating, and in the same location as the measurement of the noise level of the source or sources at issue. Under most conditions, the $L_{90}$ (the level of noise exceeded 90 percent of the time) is a conservative representation of the ambient noise level.[37]

The only potential noise-sensitive uses within 900 feet of, and that have a direct line-of-sight to, the project site is 1010 16th Street, a newly constructed multi-unit residential building located north of the project site. Long-term noise monitoring conducted on June 17, 2020,[38] indicates that the average nighttime (10 p.m. to 7 a.m.) $L_{90}$ value on the 1010 16th Street property line, the nearest residential receptor, is 53 dBA. Given this ambient noise level, the applicable noise standard for the commercial property line is an increase of 8 dBA, or an ambient noise level of 61 dBA with implementation of the modified project during nighttime hours. The average daytime (7 a.m. to 10 p.m.) $L_{90}$ value on the 16th Street property line is 59 dBA. Thus, the noise threshold for the daytime hours is 67 dBA.[39]

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36 Truck counts were taken on August 16, 2017, and included the Sixth Street entrance to and Brannan Street exit from the main parking lot at the existing Wholesale Flower Market; the private service drive at Fifth Street, north of the existing flower market; and Morris Street at Bryant Street. Because Morris Street also serves other existing uses, and because the Wholesale Flower Market's driveways may provide access to a non–flower market wholesale floral business adjacent to the market, the counts are presumed to be conservative.

37 City and County of San Francisco, *Citywide Noise Guidance*, December 2014.

38 The noise monitoring occurred during a statewide shelter-in-place order associated with the COVID-19 pandemic, which resulted in limited business activities. Therefore, the baseline for comparison of noise impacts from the modified project is the project site and surrounding activity on June 17, 2020, when the project site was vacant. As a result, noise monitoring likely underestimates the contribution to ambient noise levels from historic project site activity, vehicle traffic, and Caltrain operations on the adjacent rail line. Underestimating existing ambient noise level is conservative because a higher applicable noise standard would be anticipated under historic, or "normal" conditions without business restrictions. Therefore, the analysis presented herein is conservative, because it likely overestimates the contribution of noise from the modified project relative to existing ambient noise levels.

39 59 dBA + 8 dBA = 67 dBA.

Reference noise levels for loading activity from box trucks (which includes operation of transportation refrigeration units) and vans were monitored at the existing Wholesale Flower Market facility during two consecutive days in September 2017.[40] Peak hourly average noise levels of 66 to 72 dBA were recorded approximately 50 feet from the loading bays on Morris Street. The proposed box truck parking areas on the southern side of the level 1 parking area would be approximately 185 feet from the northern property line. At this distance, noise from loading activities would attenuate to 55 to 61 dBA. The screening around the level 1 parking area would be further expected to reduce noise levels by a minimum of 5 dBA at the northern property line, resulting in a maximum noise level of 56 dBA. Therefore, noise levels would be below the applicable standard of 67 dBA during the daytime hours as well as the applicable standard of 61 dBA during the nighttime hours, resulting in a less than significant impact.

Further attenuating box truck and van loading noise to the nearest receptor, the residential building at 1010 16th Street, results in an exterior noise level of 53 dBA. Assuming a conservative building attenuation level of 15 dBA with windows open,[41] interior noise levels at this closest receptor would be 38 dBA, and below the daytime and nighttime noise ordinance standards of section 2909(b) of the San Francisco Police Code, were it to apply to these non-fixed sources.

Semi-trailer trucks would access the enclosed loading bays on level 1 from Mississippi Street. There would be no line of sight between the loading bays and any noise-sensitive receptors. The access point for the semi-trailer truck loading bays is approximately 300 feet from the nearest sensitive receptor on the northwest corner of 16th and Mississippi streets and 200 feet from the northern property line. Once inside the loading bay, the proposed structure would effectively shield noise generated by loading and unloading activities (e.g., dropping of loading gates, and noise from dollies and wheeling of carts). Table NO-1 shows noise levels associated with semi-trailer truck maneuvering and loading, including operation of transportation refrigeration units.[42] As shown in the table, the highest noise levels generated during a semi-trailer truck operation would be 63 dBA at 100 feet, as it maneuvers into the loading dock. This noise level would be attenuated to approximately 57 dBA at the northern property line on 16th Street across from the nearest noise-sensitive receptor at 1010 16th Street. This would result in less than an 8 dBA increase over the ambient measurement of 53 dBA and would comply with San Francisco Police Code section 2909(b). Consequently, noise from three daily deliveries by semi-trailer trucks would be less than the applicable 61 dBA noise standard during the nighttime hours; hence, this impact would be less than significant.

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40 Environmental Science Associates, *Noise Technical Memorandum for the New Flower Mart Project*, March 6, 2018.

41 U.S. EPA, *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety*, March 1974, http://nepis.epa.gov/Exe/ZyPDF.cgi/2000L3LN.PDF?Dockey=2000L3LN.pdf, accessed January 23, 2019.

42 Environmental Science Associates, *Fresh and Easy Distribution Truck Noise Study*, December 3, 2008.

**Table NO-1 Semi-Trailer Truck Operations and Delivery**

| NOISE LEVELS | Equivalent Continuous Noise Level (Leq), in dBA | | |
|---|---|---|---|
| Scenario | 25 Feet | 50 Feet | 100 Feet |
| Truck Maneuvering into Loading Area with Operating Transportation Refrigeration Unit | 71.5 | 65.9 | 63.2 |
| Transportation Refrigeration Unit On with Engine at Idle | 68.6 | 65.5 | 59.3 |
| Transportation Refrigeration Unit On with Engine Off | 64.5 | 61.7 | 57.2 |
| Unloading Activities Using Loading Dock with Transportation Refrigeration Unit On | 67.9 | 65.0 | 61.8 |
| Unloading Activities Using Scissor Lift with Transportation Refrigeration Unit On | 67.9 | 65.1 | 61.4 |

NOTES: dBA = A-weighted decibels

SOURCE: Environmental Science Associates, *Fresh and Easy Distribution Truck Noise Study*, December 3, 2008

The above analysis satisfies the requirement under Project Mitigation Measure M-NO-4 of the 901 16th Street EIR and Eastern Neighborhoods PEIR Mitigation Measure F-5, which require a site survey to identify potential noise-sensitive uses within 900 feet of, and that have a direct line-of-sight to, the project site, and collection of at least one 24-hour noise measurement, prior to the first project approval action that demonstrates with reasonable certainty that the proposed use would comply with the use compatibility requirements in the General Plan and in the San Francisco Police Code section 2909, would not adversely affect nearby noise-sensitive uses, and that there are no particular circumstances about the project site that appear to warrant heightened concern about noise levels that would be generated by the proposed use.

For the reasons stated above, implementation of the modified project would not result in new or more severe operational noise impacts than those identified in the 901 16th Street EIR.

**TRAFFIC-GENERATED NOISE**

The modified project would increase daily vehicle trips along roadways in the project vicinity. The 901 16th Street EIR found that the project's proposed daily (4,324) and p.m. peak-hour (513) vehicle trips would not cause a doubling in traffic volumes in the surrounding area. Thus, the 901 16th Street EIR determined that the original project would not cause a noticeable increase in the ambient noise level in the project vicinity and concluded that impacts would be less than significant. The modified project would generate 2,001 daily trips, 204 a.m. peak-hour trips, and 18 p.m. peak-hour trips.[43] Therefore, the modified project's roadside noise impacts would be less than those of the original 901 16th Street project, and the impact of traffic noise would likewise be less than significant.

Overall, the modified project would not result in new significant impacts that were not previously identified in the 901 16th Street EIR related to operational noise and vibration, would not result in more severe impacts than those identified in the 901 16th Street EIR, and would not require new mitigation measures.

[43] Adavant Consulting, 901 16th Street Permanent Off-Site Flower Mart Project Addendum to the Transportation Impact Study – Case No. 2011.1300ENV, September 16, 2020

**MODIFIED PROJECT VARIANT IMPACTS**

The modified project variant would have the same construction and operational noise impacts as those described above for the modified project, and would be less than significant with mitigation.

**CUMULATIVE IMPACTS**

As stated in the 901 16th Street EIR, the original project was determined to be consistent with the growth projections in the Eastern Neighborhoods PEIR. Because the modified project would similarly not exceed the growth assumptions in the Eastern Neighborhoods PEIR, the cumulative noise impact of buildout of the modified project in combination with development anticipated by the Eastern Neighborhoods PEIR would be less than significant with mitigation.

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## Air Quality

**901 16TH STREET EIR FINDINGS**

Air quality impacts were addressed in Appendix A: Notice of Preparation and Community Plan Exemption Checklist of the 901 16th Street EIR, which incorporates the Eastern Neighborhoods PEIR by reference. The Eastern Neighborhoods PEIR identified potentially significant air quality impacts from construction activities and impacts on sensitive land uses caused by exposure to elevated levels of diesel particulate matter (DPM) and other toxic air contaminants (TACs). The Eastern Neighborhoods PEIR identified four mitigation measures to reduce these air quality impacts to less-than-significant levels.

- PEIR Mitigation Measure G-1 requires individual projects involving construction activities to include dust control measures consistent with the Bay Area Air Quality Management District's (BAAQMD's) dust control approach to minimize emissions of fugitive particulate matter during construction.
- PEIR Mitigation Measure G-2 addresses the siting of sensitive land uses near sources of TACs by requiring installation of ventilation and filtration systems where the exposure to concentrations of DPM and particulate matter 2.5 microns or less in diameter ($PM_{2.5}$) exceeds trigger levels set by the San Francisco Department of Public Health.
- PEIR Mitigation Measures G-3 and G-4 address proposed uses that include sources of DPM and other TACs by requiring that such sources not be located closer than 1,000 feet from sensitive receptors.

The Eastern Neighborhoods PEIR concluded that with implementation of Mitigation Measures G-1, G-2, G-3, and G-4, the Area Plan would be consistent with the Bay Area 2005 Ozone Strategy, the applicable air quality plan at the time. All other air quality impacts were found to be less than significant.

The 901 16th Street EIR found that the original project would result in construction-related emissions of oxides of nitrogen ($NO_X$) that would exceed BAAQMD's significance threshold for construction. The 901 16th Street EIR identified Project Mitigation Measure M-AQ-1, which modified Eastern Neighborhoods PEIR Mitigation Measure G-1 to require that engines on certain construction equipment meet higher emissions standards. Implementing this measure would reduce the impact of NOx emissions to a less-than-significant level. Unmitigated construction emissions of other pollutants were found to be less than their respective significance thresholds.

Mitigation Measure G-1 in the Eastern Neighborhoods PEIR included measures for dust control. However, the requirements and procedures established by the San Francisco Dust Control Ordinance adopted by the San Francisco Board of Supervisors (Ordinance 176-08, effective July 30, 2008) superseded the dust control provisions of PEIR Mitigation Measure G-1 to ensure that construction dust impacts would not be significant. The 901 16th Street EIR identified impacts of operational emissions as less than significant and found that the original project would be consistent with the applicable clean air plan at the time, the Bay Area 2010 Clean Air Plan.

With respect to health risk impacts, because of the project site's location within an Air Pollutant Exposure Zone (APEZ), the 901 16th Street EIR found that the original project would result in substantial health risk impacts caused by exposure of nearby sensitive receptors to DPM emissions from heavy-duty construction equipment and diesel vehicles over the two-year construction period. The analysis identified Project Mitigation Measure M-AQ-1 to reduce this impact to a less-than-significant level. Project Mitigation Measure M-AQ-1 required all off-road equipment greater than 25 horsepower and operating for more than 20 hours total over the entire construction period to have engines that meet or exceed the U.S. Environmental Protection Agency (USEPA) tier 3 emission standards, and to be retrofitted with a California Air Resources Board (CARB)–approved level 3 verified diesel emissions control strategy.

The original project would site new sensitive receptors on the project site. However, health risk impacts on these receptors were found to be less than significant through compliance with San Francisco Health Code article 38. Article 38 requires that the project sponsor submit an Enhanced Ventilation Proposal for approval by the San Francisco Department of Public Health, demonstrating a reduction in $PM_{2.5}$ emissions equivalent to that associated with filtration systems with a Minimum Efficiency Reporting Value of 13 (MERV 13). This requirement superseded PEIR Mitigation Measure G-2, resulting in less-than-significant impacts related to health risks for proposed onsite receptors. Health risk impacts from the emergency backup diesel generator for the original project were found to be less than significant with implementation of Project Mitigation Measure M-AQ-2, which required that stationary TAC sources meet tier 4 engine emission standards (interim or final, whichever is in effect), or use a current EPA tier 2 or tier 3 certified engine that is equipped with CARB-approved level 3 verified diesel emissions control strategy.

**MODIFIED PROJECT IMPACTS**

Construction of the modified project would be completed in a single phase with six sub-phases (some of which would overlap). Construction of the parking structure would involve demolition and ground improvements, foundation/utilities work, and construction of columns, a deck, and a ramp. Construction activities for the renovated buildings would include interior demolition and abatement, structural/envelope work, and tenant improvements. The total duration for construction is anticipated to be approximately 17 months, with operation of the modified project expected to begin in early 2022.

Construction activities, though short-term, typically emit ozone precursors (reactive organic gases and NOx) and particulate matter in the form of fugitive dust and exhaust (e.g., vehicle tailpipe emissions). Emissions of ozone precursors and particulate matter result primarily from the combustion of fuel in on-road vehicle and off-road construction equipment engines. Reactive organic gases are also emitted during activities that involve painting, the use of other types of architectural coatings, and asphalt paving.

**FUGITIVE DUST**

Demolition, renovation, and ground disturbance would emit fugitive dust and add particulate matter to the local atmosphere. Ground-disturbing activities such as grading and excavation would be limited to the approximately 1-acre area of the proposed parking structure. However, compliance with the San Francisco Construction Dust Control Ordinance (codified in health code article 22B and building code section 106.A.3.2.6) would reduce the amount of fugitive dust generated during site preparation, demolition, and construction work to protect the health of the general public and of on-site workers and minimize public nuisance complaints.

For projects larger than 0.5 acre, such as the modified project, the San Francisco Construction Dust Control Ordinance requires that the project sponsor submit a dust control plan for approval by the health department. The building inspection department will not issue a building permit without written notification from the director of public health that the applicant has a site-specific dust control plan, unless the director waives the requirement. The site-specific dust control plan would supersede PEIR Mitigation Measure G-1 and would require the project sponsor to implement dust control measures such as installing dust curtains and windbreaks, and to provide independent third-party inspections and monitoring, provide a public complaint hotline, and suspend construction during high-wind conditions. The regulations and procedures set forth by the San Francisco Construction Dust Control Ordinance would result in less-than-significant construction-related fugitive dust impacts, consistent with the BAAQMD CEQA Guidelines.[44]

**CRITERIA AIR POLLUTANTS**

CONSTRUCTION

Over the 17-month construction period (359 workdays) for the modified project, construction activities would generate emissions of criteria air pollutants from off-road equipment exhaust, on-road vehicular activity (haul trucks and vendor deliveries), and construction workers' automobile trips. The modified project's construction-related emissions of criteria air pollutants were quantified using the California Emissions Estimator Model (CalEEMod) version 2016.3.2 and are presented in Table AQ-1 CalEEMod was developed in collaboration with California air districts' staff and includes default data for a variety of land uses.

Construction emissions were estimated using information provided by the project sponsor regarding the project's construction phasing and schedule, its off-road equipment fleet and activity, and the number of on-road construction vehicle trips. Default assumptions were used where project-specific information was not available. Emissions from CalEEMod were converted from tons per year to pounds per day, using the estimated construction duration of 359 working days. As shown in Table AQ-1, unmitigated project construction emissions would be below the respective BAAQMD thresholds of significance for all criteria pollutants. Therefore, the impact of project construction emissions of criteria pollutants would be less than significant.

[44] Bay Area Air Quality Management District, *California Environmental Quality Act – Air Quality Guidelines*, May 2017, https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en, accessed July 2020.

**Table AQ-1 Daily Construction Emissions for the Modified Project**

| | Pollutant Emissions (Average Pounds per Day) | | | |
|---|---|---|---|---|
| | ROG | NOx | Exhaust $PM_{10}$ | Exhaust $PM_{2.5}$ |
| 2020 | 6.5 | 25.1 | 1.3 | 1.2 |
| 2021 | 6.4 | 32.6 | 1.2 | 1.1 |
| Project Total | 6.5 | 29.6 | 1.2 | 1.1 |
| Significance Threshold | 54.0 | 54.0 | 82.0 | 54.0 |
| Significant Impact? | No | No | No | No |

NOTES:

NOX = oxides of nitrogen; PM2.5 = particulate matter 2.5 microns or less in diameter; PM10 = particulate matter 10 microns or less in diameter; ROG = reactive organic gases

Project construction emissions were estimated using the California Emissions Estimator Model, version 2016.3.2. See Appendix AIR for model outputs and more detailed assumptions. PM10 and PM2.5 values represent particulate matter exhaust only per the Bay Area Air Quality Management District CEQA Air Quality Guidelines.

SOURCE: Data compiled by Environmental Science Associates in 2020

OPERATION

Operation of the modified project is expected to begin in early 2022, as soon as construction is complete. Criteria pollutants from operational sources at the new Wholesale Flower Market, such as vehicle traffic and natural gas combustion, are not quantified in this analysis because the Permanent Off-Site Flower Mart Project would relocate the existing Wholesale Flower Market within San Francisco, and would not change overall operations.

The size and capacity of the new flower market would be similar to the size and capacity of the existing market (i.e., the same number of vendors and badge holders). Thus, the associated activity by vehicles, including customer vehicles, trucks, and transportation refrigeration units, would be similar to that of the existing Wholesale Flower Market. The modified project would shift these emissions from the SoMa neighborhood in San Francisco to the Showplace Square/Potrero Hill Subarea, but the emissions would still occur within the same region and air basin, and would not lead to a net increase in motor vehicle–related emissions. Similarly, building emissions from the new facility would be comparable to emissions from the existing facility because the building areas are similar in size. Thus, the modified project would not result in a change in regional emissions of criteria air pollutants, and criteria pollutant emissions during project operation were not quantified.

**HEALTH RISKS AND HAZARDS**

The project site is located within the APEZ. As defined in San Francisco Health Code article 38, the APEZ consists of areas that, based on modeling of all known air pollutant sources, exceed health protective standards for cumulative annual average $PM_{2.5}$ concentrations, cumulative lifetime excess cancer risk, and proximity to freeways. Projects within the APEZ require special consideration to determine whether the project's activities would expose sensitive receptors to substantial concentrations of air pollutants or add TAC emissions to areas already adversely affected by poor air quality. Consequently, a screening-level heath risk assessment was

conducted to estimate the potential health risks associated with the exposure of nearby sensitive receptors to the project's construction and operational TAC emissions.

The nearest off-site sensitive receptors to the modified project site are multi-family residences in the eastern tower of 1010 16th Street, approximately 80 feet north of the project site directly across 16th Street. Single-family residential receptors are also located approximately 110 feet south of the project site at the corner of 17th and Missouri streets. The Kaiser Permanente Mission Bay Center, the nearest medical center, is located approximately 560 feet north of the project boundary. The nearest school, Live Oak School (a kindergarten through 8th grade facility) at 1555 Mariposa Street, is approximately 910 feet southwest of the project site boundary. All receptors identified above are located within the APEZ.

CONSTRUCTION

Construction of the new Wholesale Flower Market would require the use of heavy-duty off-road diesel vehicles and equipment throughout the 17-month construction period. Health risks for project construction were estimated for potential exposure to DPM and total $PM_{2.5}$ emissions (caused by combustion exhaust and fugitive sources), using project-specific construction activity data provided by the project sponsor. The construction health risk assessment was conducted using technical information from BAAQMD, the California Air Pollution Control Officers Association, CARB, the California Office of Environmental Health Hazard Assessment (OEHHA), and USEPA.

The health risk assessment was also conducted consistent with modeling protocols and methods in the City's 2020 Citywide Health Risk Assessment, as documented in the *Draft San Francisco Citywide Health Risk Assessment: Technical Support Documentation*.[45] TAC emissions were estimated using the CalEEMod and EMission FACtor 2017 (EMFAC2017) emissions models, along with additional calculation protocols from BAAQMD, USEPA, and CARB. TAC concentrations at off-site sensitive receptors were estimated using AERSCREEN, USEPA's recommended screening-level air quality dispersion model. For project construction, the model included source parameters for off-road equipment and construction haul trucks consistent with the 2020 Citywide Health Risk Assessment.

Health risks were calculated for the nearest off-site residential, hospital, and school sensitive receptors discussed above. The estimated risks in the health risk assessment are based primarily on a series of conservative assumptions for predicted environmental concentrations, exposure, and chemical toxicity, as recommended by BAAQMD and OEHHA. This includes the youngest potential age of exposure (e.g., beginning with the third trimester of pregnancy for residential receptors and age 5 for school receptors), the highest potential frequency of exposure (e.g., child residents are exposed 24 hours per day, 350 days per year), the highest recommended breathing rates (e.g., 80th- to 95th-percentile breathing rates), and the maximum age sensitivity factors for vulnerable populations such as infants and children.

In addition, as a screening model, AERSCREEN uses worst-case meteorology to estimate concentrations. The use of conservative assumptions in the health risk assessment likely overestimates exposure and therefore risk, although it is difficult to quantify the uncertainties associated with all of the assumptions made in the health risk

[45] San Francisco Department of Public Health, San Francisco Planning Department, & Ramboll. 2020. *Draft San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, https://www.sfdph.org/dph/files/EHSdocs/AirQuality/Air_Pollutant_Exposure_Zone_Technical_Documentation_2020.pdf, accessed May 2020.

assessment. Thus, using a combination of several high-end and conservative estimates for exposure parameters may substantially overestimate chemical intake and resulting excess lifetime cancer risks.

Table AQ-2, shows the unmitigated, annual average total $PM_{2.5}$ concentration and cancer risk associated with the modified project's construction activities at the off-site maximally exposed individual receptors in the APEZ. Table AQ-2 also includes the thresholds of significance that the City uses for locations within the APEZ.

**Table AQ-2 Unmitigated Maximum Construction-Related PM2.5 Concentrations and Cancer Risk at Off-Site Sensitive Receptors**

| | Modeled Maximum Annual Average $PM_{2.5}$ Concentrations ($\mu g/m^3$) | Lifetime Excess Cancer Risk (per million) |
|---|---|---|
| Unmitigated health risks | | |
| Residential Receptor in APEZ: 1010 16th Street | **0.5** | **106.9** |
| Residential Receptor in APEZ: 1239 17th Street | **0.36** | **76.0** |
| Kaiser Permanente Mission Bay in APEZ | 0.14 | **31.0** |
| Live Oak School in APEZ | 0.07 | 1.5 |
| Significance Threshold | 0.2 | 7.0 |
| Significant Impact | **Yes** | **Yes** |

NOTES:

$\mu g/m^3$ = micrograms per cubic meter; APEZ = Air Pollutant Exposure Zone; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

Values indicated in **bold** exceed thresholds.

SOURCE: Data compiled by Environmental Science Associates in 2020

As shown in the table, at both residential receptors, unmitigated health risks during construction would exceed the threshold of significance for both annual average $PM_{2.5}$ concentrations and lifetime excess cancer risk. Unmitigated lifetime excess cancer risk at the medical center would also exceed the threshold. Thus, Mitigation Measure AQ-1, Construction Air Quality**,** which modifies portions of Project Mitigation Measure M-AQ-1 from the 901 16th Street EIR, has been identified to reduce the impacts on sensitive receptors of TAC exposure during construction. Mitigation Measure AQ-1 requires that diesel engines powering all construction equipment comply with USEPA tier 4 final emissions standards. Table AQ-3 shows the mitigated annual average $PM_{2.5}$ concentrations and lifetime excess cancer risk from construction at all receptors analyzed.

**Table AQ-3 Mitigated Maximum Construction-Related $PM_{2.5}$ Concentrations and Cancer Risk at Off-Site Sensitive Receptors**

| | Modeled Maximum Annual Average $PM_{2.5}$ Concentrations ($\mu g/m^3$) | Lifetime Excess Cancer Risk (per million) |
|---|---|---|
| **Mitigated health risks**[1] | | |
| Residential Receptor in APEZ: 1010 16th Street | 0.03 | 4.7 |
| Residential Receptor in APEZ: 1239 17th Street | 0.02 | 3.3 |
| Kaiser Permanente Mission Bay in APEZ | 0.01 | 1.8 |
| Live Oak School in APEZ | 0.004 | 0.1 |
| Significance Threshold | 0.2 | 7.0 |
| Significant Impact | No | No |

NOTES:

$\mu g/m^3$ = micrograms per cubic meter; APEZ = Air Pollutant Exposure Zone; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

Values indicated in **bold** exceed thresholds.

[1] Mitigation includes diesel engines on all construction equipment greater than 25 horsepower that meet the U.S. Environmental Protection Agency's tier 4 final emission standards.

SOURCE: Data compiled by Environmental Science Associates in 2020

Mitigation Measure AQ-1: Construction Air Quality

The project sponsor or the project sponsor's contractor shall comply with the following requirements:

A. *Engine Requirementsy*

1. All diesel-fueled off-road equipment greater than 25 horsepower shall have engines that meet USEPA's tier 4 final emission standards.

2. Where access to alternative sources of power is available, portable diesel engines shall be prohibited.

3. Diesel engines, whether for off-road or on-road equipment, shall not be left idling for more than two minutes at any location, except as provided in the exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions). The contractor shall post legible and visible signs in English, Spanish, and Chinese in designated queuing areas and at the construction site to remind operators of the two-minute idling limit.

4. The contractor shall instruct construction workers and equipment operators on the maintenance and tuning of construction equipment, and shall require that such workers and operators properly maintain and tune equipment in accordance with the manufacturer's specifications.

B. *Waiversy*

1. The planning department's Environmental Review Officer (ERO) or designee may waive the alternative source of power requirement of Subsection (A)(2) if an alternative source of power is

limited or infeasible at the project site. If the planning department grants the waiver, the contractor must submit documentation that the equipment used for on-site power generation meets the requirements of Subsection (A)(1).

2. The ERO may waive the equipment requirements of subsection (A)(1) if: a particular piece of off-road Tier 4 Final equipment is not available or feasible or would not produce desired emissions reduction due to expected operating modes. In granting the waiver, the project sponsor must demonstrate with substantial evidence that the overall combined construction and operational cancer risk does not exceed 7 per one million persons exposed and an annual average concentration of 0.2 ug/m3 at nearby sensitive receptors.

C. *Construction Emissions Minimization Plan*. Before starting on-site construction activities, the contractor shall submit a construction emissions minimization plan to the San Francisco Planning Department for review and approval. The plan shall state, in reasonable detail, how the contractor will meet the requirements of Section A.

1. The construction emissions minimization plan shall include estimates of the construction timeline by phase, with a description of each piece of off-road equipment required for every construction phase. The description may include but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For verified diesel emissions control strategies installed, the description may include: technology type, serial number, make, model, manufacturer, CARB verification number level, and installation date and hour meter reading on the installation date. For off-road equipment using alternative fuels, the description shall also specify the type of alternative fuel being used.

2. The project sponsor shall ensure that all applicable requirements of the construction emissions minimization plan have been incorporated into the contract specifications. The plan shall include a certification statement that the contractor agrees to comply fully with the plan.

3. The contractor shall make the construction emissions minimization plan available to the public for review on-site during working hours. The contractor shall post at the construction site a legible and visible sign summarizing the plan. The sign shall also state that the public may ask to inspect the plan for the project at any time during working hours, and shall explain how to request to inspect the plan. The contractor shall post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way.

D. *Monitoring*. After the start of construction activities, the contractor shall submit quarterly reports to the ERO documenting compliance with the construction emissions minimization plan. After the completion of construction activities and before receiving a final certificate of occupancy, the project sponsor shall submit to the ERO a final report summarizing construction activities, including the start and end dates and duration of each construction phase, and the specific information required in the plan.

Based on the estimates shown in Table AQ-3, using tier 4 diesel engines on all construction equipment greater than 25 horsepower as part of Mitigation Measure AQ-1 would reduce emissions of DPM and $PM_{2.5}$ exhaust from construction equipment by approximately 96 percent compared to unmitigated levels. This would result in a comparable decrease in annual average $PM_{2.5}$ concentrations and lifetime excess cancer risk. As shown in Table AQ-3, the mitigated health risks to all receptors would be less than the City's significance thresholds for areas

within the APEZ. Therefore, impacts related to construction health risks would be less than significant with mitigation.

OPERATION

The modified project would not include any stationary sources of TACs such as backup diesel generators. The primary sources of emissions of DPM and other TACs during operation of the modified project would be from travel and idling of heavy-duty delivery vehicles and operation of truck-mounted, diesel-powered transportation refrigeration units for refrigerated goods.

Health risks during project operation were estimated for potential exposure to DPM and $PM_{2.5}$ emitted by combustion exhaust and fugitive sources, using project-specific operational activity data from the project sponsor. The operational health risk assessment was conducted using technical information from BAAQMD, the California Air Pollution Control Officers Association, CARB, the OEHHA, and USEPA. For project operations, the screening analysis included source parameters for trips and idling by heavy-duty delivery vehicles, and operation of diesel transportation refrigeration units. Operational health risks were analyzed for the same residential, medical center, and school receptors as those analyzed for exposure to construction TACs. The modified project does not include any residential uses and therefore would not introduce any new sensitive receptors to the site. Consequently, no on-site receptors were modeled.

While CEQA Guidelines section 15125(a)(1) expressly allows for use of historic conditions when establishing a baseline, the project site was vacant at the time of preparation of this addendum. Therefore, this air quality analysis represents a worst-case scenario because it calculates health risks based on there being no activity at the project site currently (the net change in health risks from the modified project would be greater when the project site has no activity than it would be if historic activity at the project site were subtracted from the modified project's incremental increase in health risks).

Health risks were calculated for two scenarios: exposure to operational TAC emissions only (beginning with the first full year of operation in 2022), and exposure to combined construction and operational TAC emissions[46] (beginning with the first year of construction activity in 2020). This was done because lifetime cancer risk represents 30 years of total exposure according to OEHHA and BAAQMD guidelines, and single receptors may be exposed to emissions from both the construction and operational periods throughout their lifetime. Although it is unlikely that the same receptor would remain stationary for 30 years, the health risk assessment assumed this worst-case scenario to estimate the highest potential risk for nearby sensitive receptors. This is especially conservative for the medical center receptor, whose health risks were modeled using the same exposure duration as residential receptors (i.e., 30 years). Actual health risk at the medical center would be much lower than the risks estimated here and would depend on the length of time a patient spends at the medical center, which would be much shorter than 30 years.

As discussed above for construction health risks, the estimated risks in the health risk assessment are based primarily on a series of conservative assumptions related to predicted environmental concentrations, exposure,

[46] Combined maximum construction and operational $PM_{2.5}$ concentrations and cancer risk do not necessarily reflect the sum of individual construction and operational maximums because the maximum concentration and/or risk during construction may occur at different locations.

and chemical toxicity, as recommended by BAAQMD and OEHHA. Thus, the combination of several high-end and conservative estimates used as exposure parameters may substantially overestimate chemical intake, and the excess lifetime cancer risks calculated in the health risk assessment are likely to be overestimated.

Table AQ-4 shows the maximum annual-average exposure to $PM_{2.5}$ exhaust and lifetime excess cancer risk associated with operation of the modified project for off-site maximally exposed individual sensitive receptors located in the APEZ. Table AQ-4 also includes the thresholds of significance used by the City.

**Table AQ-4 Maximum Operation and Construction Plus Operation $PM_{2.5}$ Concentrations and Cancer Risk at Off-Site Sensitive Receptors**

| | Modeled Maximum Annual Average $PM_{2.5}$ Exhaust Concentrations ($\mu g/m^3$) | | Lifetime Excess Cancer Risk (per million) | |
|---|---|---|---|---|
| | Operation Only | Construction + Operation | Operation Only | Construction + Operation |
| **Unmitigated health risk** | | | | |
| Residential Receptor in APEZ: 1010 16th Street | 0.005 | **0.50** | 3.0 | **109.1** |
| Residential Receptor in APEZ: 1239 17th Street | 0.003 | **0.36** | 2.0 | **77.5** |
| Kaiser Permanente Mission Bay in APEZ | 0.003 | 0.14 | 1.5 | **31.7** |
| Live Oak School in APEZ | 0.001 | 0.07 | 0.1 | 1.6 |
| Significance Threshold | 0.2 | 0.2 | 7.0 | 7.0 |
| Significant Impact | No | **Yes** | No | **Yes** |
| **Mitigated health risk**[1] | | | | |
| Residential Receptor in APEZ: 1010 16th Street | 0.005 | 0.03 | 3.0 | 6.9 |
| Residential Receptor in APEZ: 1239 17th Street | 0.003 | 0.02 | 2.0 | 4.8 |
| Kaiser Permanente Mission Bay in APEZ | 0.003 | 0.01 | 1.5 | 2.5 |
| Live Oak School in APEZ | 0.001 | 0.004 | 0.1 | 0.2 |
| Significance Threshold | 0.2 | 0.2 | 7.0 | 7.0 |
| Significant Impact | No | No | No | No |

NOTES:

$\mu g/m^3$ = micrograms per cubic meter; APEZ = Air Pollutant Exposure Zone; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

Values indicated in **bold** exceed thresholds.

[1] Mitigation includes diesel engines on all construction equipment greater than 25 horsepower that meet the U.S. Environmental Protection Agency's tier 4 final emission standards.

SOURCE: Data compiled by Environmental Science Associates in 2020.

As shown in the table, unmitigated health risks would exceed the threshold of significance for both annual average $PM_{2.5}$ concentrations and lifetime excess cancer risk from construction and operational emissions. Implementation of Project Mitigation Measure AQ-1, Construction Air Quality, identified to reduce construction

health risks, would reduce the impact of the combined risk values to a less-than-significant level. The mitigated scenario presented above in Table AQ-4 represents the implementation of Mitigation Measure AQ-1, which would reduce combined construction and operational TAC emissions and the associated cancer risk.

Therefore, with implementation of Mitigation Measure AQ-1, the modified project would not result in any health risk impacts related to lifetime excess cancer risk and annual average $PM_{2.5}$ concentrations greater than those disclosed in the 901 16th Street EIR, would not result in more severe impacts than those previously identified in the 901 16th Street EIR, and would not require new mitigation measures.

**CONSISTENCY WITH THE 2017 CLEAN AIR PLAN**

The Community Plan Exemption Checklist for the 901 16th Street EIR found that the original project would be consistent with the 2010 Clean Air Plan applicable at the time. BAAQMD has since adopted the 2017 Clean Air Plan. Transportation control measures identified in the 2017 Clean Air Plan are implemented by the San Francisco General Plan and the planning code, for example, through the City's Transit First Policy, bicycle parking requirements, and transit impact development fees. Compliance with these requirements would ensure that the modified project is consistent with relevant transportation control measures identified in the 2017 Clean Air Plan. In addition, the modified project would generate fewer vehicle trips than the original project analyzed in the 901 16th Street EIR, as described under the Transportation and Circulation section above. Furthermore, like the original project, the modified project was determined to be consistent with San Francisco's GHG reduction strategy.[47]

Therefore, the modified project would align with the planning assumptions in the 2017 Clean Air Plan, the region's current air quality plan, and would not disrupt, delay, or otherwise hinder implementation of the 2017 Clean Air Plan.

**ODORS**

Fuel combustion by diesel-powered construction equipment and vehicles operating on-site would generate localized odors. These odors would be temporary and would not likely be noticeable beyond the project site for extended periods of time. Therefore, the impact of potential odors during construction would be less than significant.

Sources that typically generate odors include wastewater treatment and pumping facilities; landfills, transfer stations, and composting facilities; petroleum refineries, asphalt batch plants, chemical (including fiberglass) manufacturing, and metal smelters; painting and coating operations; rendering plants; coffee roasters and food processing facilities; and animal feed lots and dairies. No such uses are proposed as part of the project. Operation of the modified project would include idling by diesel trucks and transportation refrigeration units in the parking structure and at the loading dock. Diesel exhaust would generate localized odors. However, odors from these sources would not likely be perceivable beyond the project site. Therefore, operational odor impacts of the modified project would be less than significant. As such, the modified project would not result in new

[47] San Francisco Planning Department, *Compliance Checklist Table for Greenhouse Gas Analysis,* 901 16th Street, January 31, 2020.

significant impacts that were not previously identified in the 901 16th Street EIR, would not result in more severe impacts than those identified in the 901 16th Street EIR, and would not require new mitigation measures.

#### MODIFIED PROJECT VARIANT IMPACTS

The modified project variant would have the same construction-related and operational impacts as those described above for the modified project.

#### CUMULATIVE IMPACTS

Regional air pollution is by its very nature a cumulative impact. Emissions from past, present, and future projects contribute to the region's adverse air quality on a cumulative basis. No single project by itself would be sufficient in size to result in regional nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulative adverse air quality impacts.[48]

The modified project would not exceed the thresholds for construction or operational emissions of criterial air pollutants; therefore, the modified project's contribution to the regional cumulative air quality impact would be less than significant. Thus, the modified project would not result in a cumulatively considerable net increase in air pollutant emissions, nor would the project result in any significant cumulative impacts that were not previously identified in the 901 16th Street EIR.

As discussed above, the project site is located in the APEZ. The modified project would add new sources of TACs (e.g., construction emissions) in an area already adversely affected by air quality; therefore, the modified project, combined with cumulative projects, would result in a cumulative health risk impact on nearby sensitive receptors. However, with implementation of Mitigation Measure AQ-1, Construction Air Quality, the modified project's contribution to a cumulative health risk impact on nearby sensitive receptors from exposure to DPM and $PM_{2.5}$ emissions during construction would be reduced by as much as 96 percent (as shown in tables AQ-2 and AQ-3). Therefore, the modified project's contribution to a significant cumulative impact would not be cumulatively considerable.

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## Other Environmental Topics

#### AESTHETICS AND PARKING IMPACTS

CEQA section 21099(d) states: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment."[49] Accordingly, aesthetics and parking are no longer to be considered in determining whether a project has the potential to result in significant environmental effects for projects that meet all of the following three criteria:

(1) The project is in a transit priority area.

(2) The project is on an infill site.

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

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[48] Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, May 2017, page 2-1.

[49] See CEQA section 21099(d)(1).

The modified project meets each of the above three criteria; therefore, this addendum does not consider aesthetics or parking in determining the significance of project impacts under CEQA.[50]

**OTHER ENVIRONMENTAL TOPICS WITH LESS-THAN-SIGNIFICANT IMPACTS**

- Land Use and Land Use Planning: The 901 16th Street EIR found that the original project would be generally consistent with the Eastern Neighborhoods PEIR.[51] The 901 16th Street EIR also found that the original project was consistent with the zoning controls and provisions of the planning code applicable to the project site.[52] The modified project and modified project variant would not change the land use controls applicable to the project site; therefore, the project and modified project variant would not result in new significant impacts that were not previously identified in the 901 16th Street EIR, would not result in more severe impacts than those identified in the 901 16th Street EIR, and would not require new mitigation measures.
- Population and Housing: The modified project and modified project variant would relocate approximately 60 vendors and 275 employees from within San Francisco. The relocated employees would not create new demand for housing because these employees would already be living in San Francisco or elsewhere in the Bay Area. Therefore, the modified project and modified project variant would not result in new significant impacts that were not previously identified in the 901 16th Street EIR, would not result in more severe impacts than those identified in the 901 16th Street EIR, and would not require new mitigation measures.
- Tribal Cultural Resources: The 901 16th Street EIR did not analyze impacts on tribal cultural resources, as this topic was not mandated for inclusion under CEQA until 2016. The modified project and modified project variant would involve soil disturbance to depths of 1 to 67 feet below ground surface. Ground disturbing activities could damage tribal cultural resources, if present. Accordingly, the modified project would be subject to Mitigation Measure CR-1, Archeological Testing, as described in the Cultural Resources section. Implementing this mitigation measure would reduce potential impacts on tribal cultural resources to a less-than-significant level for both the modified project and modified project variant.
- Greenhouse Gas Emissions: Similar to the original project, the modified project and modified project variant were determined to be consistent with San Francisco's GHG reduction strategy.[53] Therefore, the modified project's GHG emissions would not conflict with state, regional, or local GHG reduction plans and regulations. The modified project and modified project variant would not result in new significant impacts that were not previously identified in the 901 16th Street EIR, would not result in more severe impacts than those identified in the 901 16th Street EIR, and would not require new mitigation measures.
- Wind: The modified project and modified project variant would not increase the height of the existing warehouse buildings on the project site; therefore, the modified project and modified project variant's approximately 60-foot-tall buildings would not result in new significant impacts that were not previously identified in the 901 16th Street EIR, would not result in more severe impacts than those identified in the 901 16th Street EIR, and would not require new mitigation measures.
- Shadow: The modified project and modified project variant would not cast shadow on any open space that is under the jurisdiction of the San Francisco Recreation & Parks Department. Therefore, the modified project

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50 San Francisco Planning Department, *Eligibility Checklist: CEQA Section 21099Modernization of Transportation Analysis for 901 16th Street, 2011.1300EIA*, September 8, 2020.

51 San Francisco Planning Department, *901 16th Street and 1200 17th Street Environmental Impact Report*, Case No. 2011.1300E, State Clearinghouse No. 2015022048, April 2016.

52 Ibid.

53 San Francisco Planning Department, Compliance Checklist Table for Greenhouse Gas Analysis, 901 16th Street, January 31, 2020.

and modified project variant would not result in new significant impacts that were not previously identified in the 901 16th Street EIR, would not result in more severe impacts than those identified in the 901 16th Street EIR, and would not require new mitigation measures.

- Recreation: Though the modified project and modified project variant would relocate the Wholesale Flower Mart to a different neighborhood in San Francisco it wouuld not create new demand for parks or recreational facilities because it would relocate existing PDR uses within the city. Therefore, the modified project and modified project variant would not result in new significant impacts that were not previously identified in the 901 16th Street EIR, would not result in more severe impacts than those identified in the 901 16th Street EIR, and would not require new mitigation measures.
- Utilities and Service Systems: The modified project is in an urban area and would connect to existing utilities including water and wastewater connections, electricity, natural gas, and telecommunications systems. Like the original project analyzed in the 901 16th Street EIR, the modified project and modified project variant are within the growth development projected under the Eastern Neighborhoods PEIR. Consistent with the findings in that EIR, utilities and service providers have accounted for the growth in demand, including that of the modified project, individually and cumulatively. Therefore, the modified project and modified project variant would not result in new significant impacts that were not previously identified in the 901 16th Street EIR, would not result in more severe impacts than those identified in the 901 16th Street EIR, and would not require new mitigation measures.
- Public Services: The modified project would involve PDR uses that would not generate demand for public schools. Like the original project analyzed in the 901 16th Street EIR, the modified project and modified project variant are within the amount of development projected under the Eastern Neighborhoods PEIR. As a result, the modified project's demand for public services, including fire protection and police protection, has been accounted for as part of the growth in demand resulting from buildout of the Eastern Neighborhoods Plan. The modified project and modified project variant would not result in new significant impacts that were not previously identified in the 901 16th Street EIR, would not result in more severe impacts than those identified in the 901 16th Street EIR, and would not require new mitigation measures.
- Biological Resources: The 901 16th Street EIR stated that the project site is in a developed urban environment that does not provide native natural habitat for any rare or endangered plant or animal species. In addition, there are no riparian corridors, estuaries, marshes, or wetlands on the project site that could be affected by the modified project. Therefore, the modified project and modified project variant would not result in new significant impacts that were not previously identified in the 901 16th Street EIR, would not result in more severe impacts than those identified in the 901 16th Street EIR, and would not require new mitigation measures.
- Geology and Soils: A geotechnical investigation was prepared for the modified project to determine project site–specific characteristics and appropriate construction recommendations.54 The project site does not lie within an Alquist-Priolo Earthquake Fault Zone as defined by the California Division of Mines and Geology. No known active faults cross the project site. The closest mapped active fault in the vicinity of the project site is the San Andreas Fault, approximately 7.4 miles west of the project site. This proximity would likely result in strong seismic ground shaking at the project site, which can result in ground failure such as that associated with soil liquefaction, lateral spreading, and differential compaction.

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[54] Langan Engineering and Environmental Services, Inc., *Geotechnical Investigation, San Francisco Flower Market, 901 16th Street, San Francisco, California*, June 29, 2020.

- The modified project and modified project variant are required to conform to the San Francisco Building Code, which ensures the safety of all new construction in the city. The City's building inspection department would review the project-specific geotechnical report during its review of the building permit for the modified project. The building inspection department may require additional site-specific soils report(s) through the building permit application process, as needed. The building inspection department's requirement for a geotechnical report, and review of the building permit application pursuant to the department's implementation of the building code and the bulletins cited above, would ensure that the modified project and modified project variant would have no significant impacts related to soils, seismic, or other geological hazards.
- With respect to paleontological resources, the 901 16th Street EIR states that impacts on paleontological resources would be reduced to less than significant with implementation of Project Mitigation Measure M-CP-1. As stated in the Cultural Resources section, the modified project would implement Mitigation Measure CR-1, Accidental Discovery, which would supersede Project Mitigation Measure M-CP-1 and similarly reduce impacts to a less-than-significant level. Therefore, the modified project would not result in new significant impacts that were not previously identified in the 901 16th Street EIR, would not result in more severe impacts than those identified in the 901 16th Street EIR, and would not require new mitigation measures.

- Hydrology and Water Quality: Like the original project analyzed in the 901 16th Street EIR, the modified project and modified project variant would comply with the Stormwater Management Ordinance, which would reduce impacts to a less-than-significant level. Compliance with this ordinance requires submittal of an erosion and sediment control plan, stormwater control plan, and post-construction stormwater design guidelines for review and approval by the San Francisco Public Utilities Commission. Therefore, based on the requirements of existing regulations, the modified project and modified project variant would not violate water quality standards, substantially degrade water quality, or provide substantial additional sources of polluted runoff. As such, the modified project and modified project variant would not result in new significant impacts that were not previously identified in the 901 16th Street EIR, would not result in more severe impacts than those identified in the 901 16th Street EIR, and would not require new mitigation measures.

- Hazards and Hazardous Materials: Previous investigations of the project site identified the following results: coal tar was encountered from 10 to 20 feet below ground surface, with some occurring as shallow as 1.5 feet below ground surface; select volatile organic compounds exceeded the San Francisco Bay Regional Water Quality Control Board's residential environmental screening levels in soil gas; asbestos as chrysotile was detected in soil; and heavy metal concentrations in soil (primarily lead) exceeded hazardous waste criteria.[55] As part of compliance with the Maher Ordinance, a site mitigation plan for the project site was approved by the San Francisco Department of Public Health on November 9, 2019. In December 2019, the public health department was informed of the modified project and confirmed that the project sponsor would be permitted to rely on most provisions of the approved site mitigation plan, pending submittal of an addendum to address changes in the project design. On June 10, 2020, the public health department accepted the site mitigation plan addendum with the following caveats:

  (1) If hazardous waste levels of contamination remain at the site, the project sponsor will need to cite the area of contamination in the deed restriction.

[55] Ramboll, *Site Mitigation Plan Addendum, 901 16th Street and 1200 17th Street, San Francisco, California*, EHB-SAM No. SMED: 1151, June 8, 2020.

(2) Confirmation samples will be taken at the bottom of excavations where soil will be removed.

(3) Import soil shall meet the California Department of Toxic Substances Control's soil import guidance.

(4) Ramboll shall replace Langan as the environmental consultant responsible for witnessing response to unknown issues.[56]

Compliance with the Maher Ordinance and other applicable regulations would ensure that the modified project and modified project variant would not result in significant impacts related to hazardous soil and/or groundwater or other potential hazardous materials beyond those impacts identified in the 901 16th Street EIR. Therefore, the modified project would not result in new significant impacts that were not previously identified in the 901 16th Street EIR, would not result in more severe impacts than those identified in the 901 16th Street EIR, and would not require new mitigation measures.

- Mineral and Energy Resources: All land in San Francisco, including the project site, is designated by the California Geological Survey as Mineral Resource Zone Four (MRZ-4) under the Surface Mining and Reclamation Act of 1975. The MRZ-4 designation indicates that adequate information does not exist to assign the area to any other mineral resource zone; therefor, the area is not designated as having significant mineral deposits. The project site is not a mineral resource recovery site; would not require quarrying, mining, dredging, or extraction of locally important mineral resources on the project site; and would not deplete non-renewable natural resources. Therefore, the modified project and modified project variant would not result in new significant impacts that were not previously identified in the 901 16th Street EIR, would not result in more severe impacts than those identified in the 901 16th Street EIR, and would not require new mitigation measures.

- Agriculture and Forest Resources: The project site and surrounding areas do not contain agricultural or forest uses and are not zoned for such uses. Therefore, construction of the modified project or modified project variant would not convert any prime farmland, unique farmland, or Farmland of Statewide Importance to non-agricultural use; would not conflict with existing zoning for agricultural land use or a Williamson Act contract; and would not involve any changes to the environment that could result in the conversion of farmland. The modified project and modified project variant would not result in the loss of forest land or conversion of forest land to non-forest uses. Therefore, the modified project and modified project variant would not result in new significant impacts that were not previoulsy identified in the 901 16th Street EIR, would not result in more severe impacts than those identified in the 901 16th Street EIR, and would not require new mitigation measures.

- Wildfire: The 901 16th Street EIR did not analyze wildfire impacts, as this topic was not mandated for inclusion under CEQA until 2019. The project site is in a fully developed urban area that is not subject to substantial risk of wildfire; therefore, potenital wildfire impacts of the modified project and modified project variant would be less than significant.

- Mandatory Findings of Significance: This addendum and the 901 16th Street EIR together provide a comprehensive discussion of the potential for the project to affect the quality of the environment. Specifically, the discussion of biological resources concludes that the project would not substantially affect habitats, fish and wildlife populations, and sensitive natural communities; nor would it threaten to eliminate a plant or animal community or reduce the number or restrict the range of a rare or endangered plant or

[56] San Francisco Department of Public Health, San Francisco Health Code Article 22A Compliance, Development, 901 16th and 1200 17th Street, San Francisco, CA, EHB-SAM Case Number: 1945 (formerly 1151).

animal. The discussion of cultural resources describes the potential for the project to affect important examples of California history.

With implementation of identified mitigation, the modified project in combination with the past, present, and reasonably foreseeable projects would not result in significant cumulative impacts on land use, aesthetics, population and housing, cultural resources, tribal cultural resources, transportation and circulation, noise, air quality, GHG emissions, wind, shadow, recreation, utilities and service systems, public services, geology and soils, hazards and hazardous materials, mineral resources, energy, agricultural and forest resources, or wildfire.

This addendum provides a comprehensive discussion and concludes that the modified project would not cause substantial adverse effects on human beings, either directly or indirectly.

## Conclusion

Based on the foregoing, the San Francisco Planning Department concludes that the analyses conducted and the conclusions reached for the original project in the 901 16th Street and 1200 17th Street Project EIR certified on May 12, 2016, remain valid, and that no subsequent or supplemental EIR is required for the modified project. The modified project and modified project variant would not cause new significant impacts not identified in the 901 16th Street and 1200 17th Street Project EIR; would not result in significant impacts that would be substantially more severe than those described in the 901 16th Street and 1200 17th Street Project EIR; and would not require new mitigation measures to reduce significant impacts. No changes have occurred with respect to circumstances surrounding the modified project or modified project variant that would cause significant environmental impacts to which the project would contribute considerably, and no new information has been put forward to demonstrate that the modified project would cause new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts for the original project. Therefore, no further environmental review is required beyond this addendum.

I do hereby certify that the above determination has been made pursuant to state and local requirements.

Lisa Gibson
Environmental Review Officer

September 23, 2020
Date of Determination

cc: Sponsor
Distribution List
Bulletin Board/Master Decision File

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