File No. 140767 Committee Item No. _____
Board Item No. 18

COMMITTEE/BOARD OF SUPERVISORS

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Board of Supervisors Meeting Date May 19, 2015

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Completed by: John Carroll Date May 14, 2015
Completed by: _____ Date _____

LAW OFFICES OF
STEPHEN M. WILLIAMS

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July 2, 2014

David Chiu, President
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, City Hall
San Francisco, CA 94102

RE: 2251 Greenwich Street—Firehouse #16
Environmental Application # 2012.1443E
Appeal of Categorical Exemption Determination

Dear President Chiu and Members of the Board:

INTRODUCTION AND BACKGROUND

This office represents the adjacent neighbors to the proposed Project Brent McMicking and Evan Kletter. Mr. McMicking and Mr. Kletter are the adjacent property owners immediately to the west of the subject Project site. They both own their homes and reside at the site with their families, both of which include small children.

The proposed project is the demolition and replacement of Firehouse #16 at 2251 Greenwich Street. Because the site has always been a Firehouse, it has always had underground storage tanks---that leaked gasoline and other fuels. Leaks were discovered in 1965 and again in 1987. The Leaking Underground Storage Tanks at the site were last declared "clean" in late 1998. Nevertheless, obviously there are now aging underground tanks in place at the site since that time, now slated for replacement as part of this project. The site appears on the State Water Resources Control Board 'Geo-Tracker" Map as a Leaking Underground Storage Tank site with a previous clean-up.

Because this is a public building located on a development lot which is zoned "Public" under the Planning Code, the notice process and any and all review of the Project is limited and conducted through the Civic Design Review Committee of the San Francisco Arts Commission. Our investigation revealed that the Civic Design Review process was not properly conducted for this Project.

Even though the DPW officials sponsoring the Project, and the Project manager Gabriella Judd Cirelli were keenly aware of the neighbors' objections to, and interest in, the Project, the neighbors were deliberately *not* given notice of the several presentations made to the Committee, including the presentation for final approval before the full San Francisco Arts Commission on February 3, 2014. No neighbor was given notice and no neighbor attended any of these "public" hearings. The entire process was a sham.

Because the neighbors were not notified of these public meeting, they were denied the opportunity to present public comment regarding the proposed new firehouse and to request mitigations on the Project to reduce the impacts to their homes—including

possible environmental impacts. There was an affirmative obligation under the Civic Design process to provide written notice of these meetings to the neighbors prior to the conduct of the Civic Design Review process that has been ongoing since October 2012.

The process and the neighbors' rights have been violated and the CEQA review by the Board of Supervisors is the only other public review process open to the neighbors. The environmental review was also completely mishandled by DPW and Planning. In fact, the Project received its "final approval" from the Arts Commission on February 3, 2014, and the new Categorical Exemption was not issued until June 2, 2014, some four months after the "final approval." CEQA review is required to pre-date such approvals and is supposed to be the starting point for project review, not a last hurtle to be overcome. The Project does not conform to the requirements set forth in CEQA for an exemption. The Board should remand the exemption determination to the Planning Department for further action and review.

Summary of Grounds for Appeal of Categorical Exemption

1. The Department has issued a *Second* Categorical Exemption dated June 2, 2014, (attached hereto) for the site based on an incorrect Department interpretation of CEQA that *narrows* the scope of environmental protection for the public rather than expanding such protection as required by law and court decisions interpreting CEQA.

2. Astoundingly, even though this is a "cookie-cutter" Project and a design being repeated all over the City for re-building Firehouses, the first environmental analysis failed to even note the presence of underground diesel storage tanks at the site, failed to note that the Project included replacement of one tank and the removal of another tank, failed to note the site is contained on the Maher Map as a hazardous waste site (the site was not enrolled in the Maher program until the neighbors complained) and failed to comply with any aspect of the environmental review process. The site has been a City Firehouse for more than 100 years and is confirmed to have a long history of leaking underground storage tanks and many other toxins and pollutants at the site.

3. The Project has received all approvals without any public vetting or discussion of the Project. Officials from the Dept of Public Works (the "Project Sponsor") affirmatively perjured themselves in the application process in order to avoid notifying the neighbors of any public hearings on the Project. As a result, no public hearing of any kind has ever been held on this massive new Project slated for this 100% residential neighborhood. The neighbors are apprehensive because they have been lied to by DPW and denied any chance for public input on the Project. DPW was charged with affirmatively notifying the neighbors of public hearings at the Arts Commission and failed to do so and yet falsely informed the Art's Commission that the public was notified. As a result, no member of the public was present for any "hearing."

4. The Project description did not mention that the site is a historically documented UST site, and on the California State map for UST's. The Project description failed to

mention that it includes excavation and replacement of tanks at the site and the placement of a new diesel-burning generator on the roof. The Environmental application submitted to Planning made no mention of these facts and was not accurately completed. The application also incorrectly stated that excavation at the site will not exceed eight (8') in depth and will not require disturbance of soil in excess of 5,000 gross square feet. Both of these questions were incorrectly answered on the Planning Dept's Application by DPW.

5. The Project will disturb more than 5,000 gross square feet of surface soil as the lot is 5,760 square feet in area and is being completely graded and excavated (in addition to the tank removal). Further, the Project is required to comply with the new Storm-water Management Ordinance from the SFPUC which has the same triggering number (disturbance of 5,000 gross square feet of surface soil).

6. The adjacent neighbors have very small children and of course, they are quite apprehensive not only because of the UST site but also because this property has long been (only) used as a Fire Station and the reports in the file show extensive toxins throughout the building to be demolished---especially worrisome since this is a 100% residential neighborhood. We requested that the Planning Dept revoke the Cat Ex for this Project, that the applications be corrected and resubmitted and that the Project be referred to DPH for review under the Maher Ordinance and those steps were taken, but the neighbors remain apprehensive because every aspect of the first review by the Dept was incorrect and secretive.

7. The Department's Second Categorical Exemption is based on the incorrect conclusion that the Department is *certain* the site (a state-mapped toxic waste site and leaking underground storage tank site) does not present any *possibility* of an adverse environmental impact; an irrational and unreasonable conclusion.

8. The recent testing and analysis at the site shows the continued presence of many toxins. The history of the site as a hazardous waste site and its proximity to the water table dictates that the Department should require a mitigation plan to be in place. Grading and excavation of the site could expose construction personnel and the public to contamination present in the soil associated with historic on-site uses.

9. The Department should rescind the Second Categorical Exemption given to the Project and issue a Mitigated Negative Declaration requiring DPW to develop and have in place a contingent mitigation plan to protect workers and the public if:

-Potential residual contaminants are detected in areas already tested;

-Requiring workers at the site to strictly adhere to hygienic standards to avoid dermal contact and incidental ingestion;

-Heightened dust control and masking to prevent inhalation of airborne dust released from dried hazardous materials—the neighbors have small children;

-While not anticipated once closure reports have been issued (such as here) the possibility remains that contamination (which was not encountered during soil sampling) is still present. It is possible given the site's long history of leaking underground tanks that contaminants still are present or that additional tanks are present which were installed prior to permitting and record keeping requirements. A plan should be in place to deal with such possibilities and to prevent migration of contaminants;

-Due to the migratory nature of oil in the soil, the risk remains for oil to exist in the soil in areas that have not been previously sampled or tested. The Project Sponsor should be required to develop and have in place a plan to deal with such an eventuality, including a system of wind barriers and retained qualified and licensed professionals to conduct on-going site control and monitoring who remain ready to commence work in any contaminated area.

Additional Grounds For Appeal:

The following exceptions to a Categorical Exemption are relevant in this case, based on Section 15300.2 of CEQA, Article 19:

A) The Site is a Former Hazardous Waste Site and There Is a Specific Statutory Exception From The Categorical Exemption

The Project site was on the State's Hazardous Waste and Substances Site List; clean-up and remedial action was twice rendered at the site for removal of leaking underground storage tanks. California Public Resources Code Section 21084(c) provides a specific exception to a categorical exemption if a site is listed on any of the State's Hazardous Waste Sites. That section states:

> **"No Project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code shall be exempted from this division ...."**

The Project site's appearance on the list of the States Hazardous Waste Sites precludes the categorical exemption that was again granted it by the Department. As a matter of law, the categorical exemptions are to be narrowly defined. It cannot be said that this site has not appeared on ANY list of Hazardous Waste Sites; it has; and a broad based reading of this exception and the site's appearance on the list (past or present) precludes the use of categorical exemption.

B) The Department Applied The Wrong Standard For a Categorical Exemption And Has Misinterpreted the Statute Which Forbids a Exemption in this Case

In order to grant to this site a Categorical Exemption, the Department offers its own "interpretation" of the above code section without reference to any supporting case law or guidelines for the interpretation. Citing the removal of the five leaking underground storage tanks, the Department states as follows:

The Department does not explain or offer any support for its interpretation of the law, and it is Appellants' contention that such an interpretation is contrary to the intent of CEQA and to the well established rules for its interpretation. The Department's interpretation is *under inclusive* while CEQA and its guidelines are specifically meant to be interpreted in a broad fashion and to be *over inclusive* to provide the citizens of California with the greatest possible environmental protection.

One of the basic principals to govern the application of CEQA is that the statute and the guidelines are to be interpreted as broadly as possible in order to provide the maximum protection to the environment and to the people of California. In the first case to interpret CEQA, the California Supreme Court made it clear that ambiguous language found in the statute was to be applied broadly rather than narrowly. In, Friends of Mammoth v Board of Supervisors 8 Cal.3rd 247 (1972), Justice Stanley Mosk wrote that the Act (CEQA) is to be interpreted and construed so as to give the environment the fullest protection possible. This analysis, now known as the "*Mammoth* interpretive principle" was based on the legislative statements of intent and is still applicable today.

The Department's narrow interpretation of Section 15300.2 is incorrect as a matter of law and violated the principles of CEQA requiring broad interpretation of its provisions. Because the Project site is included on one of the State's Hazardous Waste lists, it is not eligible for a Categorical Exemption and the Department should re-evaluate the Project and include specific mitigations because of the distinct possibility that further contaminants my be uncovered during excavation at the site.

C) The Site Can Never Meet the High Standard Of "Certainty" of "No Possibility" of an Adverse Environmental Impact

The second provision of CEQA relied upon by the Department has also been incorrectly applied and interpreted by the Department. Section 15061(b)(3) provides that a Project may be given a Categorical Exemption is it can be said with *certainty* that there is *no possibility* of an adverse environmental impact. By definition, with the issuing of the second C.E., the Department is saying that there is **absolute certainty** in this case and **no possibility** construction activity will have a significant effect on the environment.

It is hard to imagine a more unusual circumstance that could have a significant environmental impact than the proposal to construct a large new industrial building on a hazardous/toxic waste site. The location, size and type of the proposed construction is an unusual circumstance that represents an exception to the CatEx approval. The Department's analysis treats this property as if it was any other site and completely ignores the long history of toxics and hazardous materials at the site. One is tempted to

ponder, what would constitute "possible" effect on the environment? It is certainly a "possibility" that toxics are still present on the property at unacceptable levels. In fact, the testing done by the City confirms this fact. It is also reasonable to assume that the excavation of the entire lot might release some of those toxins into the surrounding environment (perhaps without even knowing it). The bottom line is, Why not require a mitigation plan IF such toxins are found at the site? Why not have DPW draw up a contingency plan to provide for this reasonable possibility? The Department should require a mitigation plan for such a contingency to be in place. The blanket categorical exemption is not appropriate.

The proposed size of the structure is also an "unusual circumstance." The building is slated to be much larger than any building constructed in the area and is the only through lot on the block, and therefore it is reasonable to assume it could cause significant environmental disruption both in terms of air, land and noise, effecting the neighborhood and the social and physical environment. The Project is **not** consistent with the zoning in the area and is the only lot zoned "P" on the block. This allows the Project to increase bulk and eliminate any rear yard.

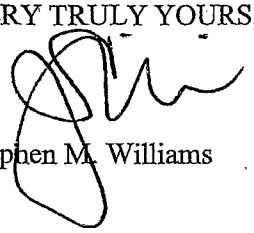
D) The Project Could Have a Significant Effect on the Environment:

By definition with the issuing of the CatEx, the Department is saying that there is **no possibility** construction activity will have a significant effect on the environment due to circumstances at the site. The location, size and type of the proposed construction is an unusual circumstance that represents an exception to the CatEx approval. The building is much larger than any building constructed in the area, and therefore could cause significant environmental disruption both in terms of air, land and noise, but also of the resulting effects on the neighborhood and the social and physical environment. The location's proximity to schools, children and the tourist destinations of visitors to San Francisco further disqualifies it for categorical exemption under the code, and is a compelling argument for a greater standard of environmental review.

Conclusion

For these reasons, we appeal the granting of a categorical exemption by the San Francisco City Planning Department to the Project sponsor, DPW. We respectfully request that the San Francisco Board of Supervisors require the current Building's demolition and the construction of any new building on the lot to undergo environmental mitigation review as required by CEQA.

VERY TRULY YOURS,



Stephen M. Williams

SAN FRANCISCO
PLANNING DEPARTMENT

CEQA Categorical Exemption Determination

PROPERTY INFORMATION/PROJECT DESCRIPTION

Project Address		Block/Lot(s)	
2251 Greenwich Street		0515/031	
Case No.	Permit No.	Plans Dated	
2012.1443E	N/A	09/10/12	
☐ Addition/ Alteration	☑ Demolition (requires HRER if over 50 years old)	☑ New Construction	☐ Project Modification (GO TO STEP 7)

Project description for Planning Department approval.

Demolition and new construction of Fire Station #13. The proposed project includes demolition of the existing 2-story, 10,272 square foot (sf) fire station built in 1938 and construction of a new 2-story, 10,398 sf fire station on the same lot with three programmed areas: (1) Apparatus bay and support, (2) firefighter operations, and (3)living quarters. The project also includes replacement of the roof top generator, removal of one underground storage tank and replacement of a second underground storage tank.

STEP 1: EXEMPTION CLASS

TO BE COMPLETED BY PROJECT PLANNER

Note: If neither class applies, an *Environmental Evaluation Application* is required.*	
☐	**Class 1 – Existing Facilities.** Interior and exterior alterations; additions under 10,000 sq. ft.; change of use under 10,000 sq. ft. if principally permitted or with a CU.
☐	**Class 3 – New Construction.** Up to three (3) new single-family residences or six (6) dwelling units in one building; commercial/office structures; utility extensions.
☑	Class 2 Replacement & reconstruction of existing structures/facilities. New structure located on the same site as structure replaced with substantially the same purpose & capacity.

STEP 2: CEQA IMPACTS

TO BE COMPLETED BY PROJECT PLANNER

If any box is checked below, an *Environmental Evaluation Application* is required.	
☐	**Transportation:** Does the project create six (6) or more net new parking spaces or residential units? Does the project have the potential to adversely affect transit, pedestrian and/or bicycle safety (hazards) or the adequacy of nearby transit, pedestrian and/or bicycle facilities?
☐	**Air Quality:** Would the project add new sensitive receptors (specifically, schools, day care facilities, hospitals, residential dwellings, and senior-care facilities) within an air pollution hot spot? *(refer to EP_ArcMap > CEQA Catex Determination Layers > Air Pollution Hot Spots)*
☑	**Hazardous Materials:** If the project site is located on the Maher map or is suspected of containing hazardous materials (based on a previous use such as gas station, auto repair, dry cleaners, or heavy manufacturing, or a site with underground storage tanks): Would the project involve 50 cubic yards or more of soil disturbance - or a change of use from industrial to residential? If yes, this box must be checked and the project applicant must submit an Environmental Application with a Phase I Environmental Site Assessment. *Exceptions: do not check box if the applicant presents documentation of enrollment in the San Francisco Department of Public Health (DPH) Maher program, a DPH waiver from the Maher program, or other documentation from Environmental Planning staff that hazardous material effects would be less than significant (refer to EP_ArcMap > Maher layer).*

☑	**Soil Disturbance/Modification:** Would the project result in soil disturbance/modification greater than two (2) feet below grade in an archeological sensitive area or eight (8) feet in a non-archeological sensitive area? *(refer to EP_ArcMap > CEQA Catex Determination Layers > Archeological Sensitive Area)*
☐	**Noise:** Does the project include new noise-sensitive receptors (schools, day care facilities, hospitals, residential dwellings, and senior-care facilities) fronting roadways located in the noise mitigation area? *(refer to EP_ArcMap > CEQA Catex Determination Layers > Noise Mitigation Area)*
☐	**Subdivision/Lot Line Adjustment:** Does the project site involve a subdivision or lot line adjustment on a lot with a slope average of 20% or more? *(refer to EP_ArcMap > CEQA Catex Determination Layers > Topography)*
☐	**Slope = or > 20%: :** Does the project involve excavation of 50 cubic yards of soil or more, square footage expansion greater than 1,000 sq. ft., shoring, underpinning, retaining wall work, or grading on a lot with a slope average of 20% or more? *Exceptions: do not check box for work performed on a previously developed portion of site, stairs, patio, deck, or fence work. (refer to EP_ArcMap > CEQA Catex Determination Layers > Topography)* **If box is checked, a geotechnical report is required and a Certificate or higher level CEQA document required**
☐	**Seismic: Landslide Zone:** Does the project involve excavation of 50 cubic yards of soil or more, square footage expansion greater than 1,000 sq. ft., shoring, underpinning, retaining wall work, grading –including excavation and fill on a landslide zone – as identified in the San Francisco General Plan? *Exceptions: do not check box for work performed on a previously developed portion of the site, stairs, patio, deck, or fence work. (refer to EP_ArcMap > CEQA Catex Determination Layers > Seismic Hazard Zones)* **If box is checked, a geotechnical report is required and a Certificate or higher level CEQA document required**
☐	**Seismic: Liquefaction Zone:** Does the project involve excavation of 50 cubic yards of soil or more, square footage expansion greater than 1000 sq ft, shoring, underpinning, retaining wall work, or grading on a lot in a liquefaction zone? *Exceptions: do not check box for work performed on a previously developed portion of the site, stairs, patio, deck, or fence work. (refer to EP_ArcMap > CEQA Catex Determination Layers > Seismic Hazard Zones)* **If box is checked, a geotechnical report will likely be required**
☐	**Serpentine Rock:** Does the project involve any excavation on a property containing serpentine rock? *Exceptions: do not check box for stairs, patio, deck, retaining walls, or fence work. (refer to EP_ArcMap > CEQA Catex Determination Layers > Serpentine)*
***If no boxes are checked above, GO TO STEP 3. <u>If one or more boxes are checked above, an *Environmental Evaluation Application* is required,</u> unless reviewed by an Environmental Planner.**	
☐	**Project can proceed with categorical exemption review. The project does not trigger any of the CEQA impacts listed above.**
Comments and Planner Signature (*optional*): Jessica Range	
Correction to exemption issued 1/23/2013. Proposed project subject to soil & groundwater remediation in compliance with Health Code Article 22B (Maher Ordinance). Project sponsor has enrolled in the Maher Program with the San Francisco Department of Public Health. Project reviewed by staff archeologist.	

STEP 3: PROPERTY STATUS – HISTORIC RESOURCE
TO BE COMPLETED BY PROJECT PLANNER

PROPERTY IS ONE OF THE FOLLOWING: *(refer to Parcel Information Map)*	
☐	**Category A:** Known Historical Resource. **GO TO STEP 5.**
☑	**Category B:** Potential Historical Resource (over 50 years of age). **GO TO STEP 4.**
☐	**Category C:** Not a Historical Resource or Not Age Eligible (under 50 years of age). **GO TO STEP 6.**

STEP 4: PROPOSED WORK CHECKLIST
TO BE COMPLETED BY PROJECT PLANNER

Check all that apply to the project.	
☐	1. **Change of use and new construction.** Tenant improvements not included.
☐	3. **Regular maintenance or repair** to correct or repair deterioration, decay, or damage to building.
☐	4. **Window replacement** that meets the Department's *Window Replacement Standards*. Does not include storefront window alterations.
☐	5. **Garage work.** A new opening that meets the *Guidelines for Adding Garages and Curb Cuts*, and/or replacement of a garage door in an existing opening that meets the Residential Design Guidelines.
☐	6. **Deck, terrace construction, or fences** not visible from any immediately adjacent public right-of-way.
☐	7. **Mechanical equipment installation** that is not visible from any immediately adjacent public right-of-way.
☐	8. **Dormer installation** that meets the requirements for exemption from public notification under *Zoning Administrator Bulletin No. 3: Dormer Windows*.
☐	9. **Addition(s)** that are not visible from any immediately adjacent public right-of-way for 150 feet in each direction; does not extend vertically beyond the floor level of the top story of the structure or is only a single story in height; does not have a footprint that is more than 50% larger than that of the original building; and does not cause the removal of architectural significant roofing features.
Note: Project Planner must check box below before proceeding.	
☑	Project is not listed. **GO TO STEP 5.**
☐	Project **does not conform** to the scopes of work. **GO TO STEP 5.**
☐	Project involves **four or more** work descriptions. **GO TO STEP 5.**
☐	Project involves **less than four** work descriptions. **GO TO STEP 6.**

STEP 5: CEQA IMPACTS – ADVANCED HISTORICAL REVIEW
TO BE COMPLETED BY PRESERVATION PLANNER

Check all that apply to the project.	
☐	1. Project involves a **known historical resource (CEQA Category A)** as determined by Step 3 and conforms entirely to proposed work checklist in Step 4.
☐	2. **Interior alterations to publicly accessible spaces.**
☐	3. **Window replacement** of original/historic windows that are not "in-kind" but are consistent with existing historic character.
☐	4. **Façade/storefront alterations** that do not remove, alter, or obscure character-defining features.
☐	5. **Raising the building** in a manner that does not remove, alter, or obscure character-defining features.
☐	6. **Restoration** based upon documented evidence of a building's historic condition, such as historic photographs, plans, physical evidence, or similar buildings.
☐	7. **Addition(s)**, including mechanical equipment that are minimally visible from a public right-of-way and meet the *Secretary of the Interior's Standards for Rehabilitation*.

☐	8. **Other work consistent** with the *Secretary of the Interior Standards for the Treatment of Historic Properties* (*specify or add comments*):
☑	9. **Reclassification of property status** to Category C. *(Requires approval by Senior Preservation Planner/Preservation Coordinator)* a. Per HRER dated: 12/28/2012 *(attach HRER)* b. Other *(specify)*:
Note: If ANY box in STEP 5 above is checked, a Preservation Planner MUST check one box below.	
☐	**Further environmental review required.** Based on the information provided, the project requires an *Environmental Evaluation Application* to be submitted. **GO TO STEP 6.**
☑	**Project can proceed with categorical exemption review.** The project has been reviewed by the Preservation Planner and can proceed with categorical exemption review. **GO TO STEP 6.**
Comments (*optional*):	
Preservation Planner Signature: Allison K. Vanderslice	

STEP 6: CATEGORICAL EXEMPTION DETERMINATION

TO BE COMPLETED BY PROJECT PLANNER

☐	**Further environmental review required.** Proposed project does not meet scopes of work in either *(check all that apply)*: ☐ Step 2 – CEQA Impacts ☐ Step 5 – Advanced Historical Review **STOP! Must file an *Environmental Evaluation Application.***	
☐	**No further environmental review is required. The project is categorically exempt under CEQA.**	
	Planner Name: Jessica Range	**Signature or Stamp:** Jessica Range Digitally signed by Jessica Range DN: dc=org, dc=sfgov, dc=cityplanning, ou=CityPlanning, ou=Environmental Planning, cn=Jessica Range, email=jessica.range@sfgov.org Date: 2014.06.02 11:41:55 -07'00'
	Project Approval Action: Building Permit *If Discretionary Review before the Planning Commission is requested, the Discretionary Review hearing is the Approval Action for the project.	
	Once signed or stamped and dated, this document constitutes a categorical exemption pursuant to CEQA Guidelines and Chapter 31 of the Administrative Code. In accordance with Chapter 31 of the San Francisco Administrative Code, an appeal of an exemption determination can only be filed within 30 days of the project receiving the first approval action.	

STEP 7: MODIFICATION OF A CEQA EXEMPT PROJECT

TO BE COMPLETED BY PROJECT PLANNER

In accordance with Chapter 31 of the San Francisco Administrative Code, when a California Environmental Quality Act (CEQA) exempt project changes after the Approval Action and requires a subsequent approval, the Environmental Review Officer (or his or her designee) must determine whether the proposed change constitutes a substantial modification of that project. This checklist shall be used to determine whether the proposed changes to the approved project would constitute a "substantial modification" and, therefore, be subject to additional environmental review pursuant to CEQA.

PROPERTY INFORMATION/PROJECT DESCRIPTION

Project Address (If different than front page)		Block/Lot(s) (If different than front page)
Case No.	Previous Building Permit No.	New Building Permit No.
Plans Dated	Previous Approval Action	New Approval Action
Modified Project Description:		

DETERMINATION IF PROJECT CONSTITUTES SUBSTANTIAL MODIFICATION

Compared to the approved project, would the modified project:	
☐	Result in expansion of the building envelope, as defined in the Planning Code;
☐	Result in the change of use that would require public notice under Planning Code Sections 311 or 312;
☐	Result in demolition as defined under Planning Code Section 317 or 19005(f)?
☐	Is any information being presented that was not known and could not have been known at the time of the original determination, that shows the originally approved project may no longer qualify for the exemption?
If at least one of the above boxes is checked, further environmental review is required	**CATEX FORM**

DETERMINATION OF NO SUBSTANTIAL MODIFICATION

☐	The proposed modification would not result in any of the above changes.
If this box is checked, the proposed modifications are categorically exempt under CEQA, in accordance with prior project approval and no additional environmental review is required. This determination shall be posted on the Planning Department website and office and mailed to the applicant, City approving entities, and anyone requesting written notice.	
Planner Name:	**Signature or Stamp:**

STEPHEN M. WILLIAMS
MARGIE LAO-WILLIAMS
2619 SUTTER ST
SAN FRANCISCO CA 94115-2924

7892
11-35/1210 CA
90398

7-2-14
Date

Pay To The Order Of Planning Dept of San Francisco $ 534—

Five hundred and thirty-four 00/100 Dollars

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For #Appeal 2251 Greenwich

Harland Clarke

Lamug, Joy (BOS)

From: BOS Legislation, (BOS)
Sent: Tuesday, May 12, 2015 11:02 AM
To: 'Stephen M. Williams'; Givner, Jon (CAT); Stacy, Kate (CAT); Byrne, Marlena (CAT); Sanchez, Scott (CPC); Jones, Sarah (CPC); Rodgers, AnMarie (CPC); Starr, Aaron (CPC); Tam, Tina (CPC); Range, Jessica (CPC); Ionin, Jonas (CPC); Storrs, Bruce (DPW); Rahaim, John (CPC); Cirelli, Gabriella (DPW); De Freitas, Paul (DPW); BOS-Supervisors; BOS-Legislative Aides
Cc: Calvillo, Angela (BOS); Caldeira, Rick (BOS); BOS Legislation, (BOS); Carroll, John (BOS); Lamug, Joy (BOS)
Subject: Appeal of Categorical Exemption Determination - 2251 Greenwich Street - Fire Station No. 16 - Appellant Letter

Good morning,

Please find linked below a letter received by the Office of the Clerk of the Board from the Appellant, regarding the appeal of the proposed project at 2251 Greenwich Street.

Appellant Letter - May 11, 2015

The appeal hearing for this matter is scheduled for a 3:00 p.m. special order before the Board on **May 19, 2015**. You are invited to review the entire matter on our Legislative Research Center by following the link below.

Board of Supervisors File No. 140767

Thanks,

Joy Lamug
Legislative Clerk
Board of Supervisors
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244
San Francisco, CA 94102
Direct: (415) 554-7712 | Fax: (415) 554-5163
Email: joy.lamug@sfgov.org
Web: www.sfbos.org

Please complete a Board of Supervisors Customer Service Satisfaction form by clicking here.

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LAW OFFICES OF
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May 11, 2015 via email and hand delivery

London Breed, President
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place
City Hall, Room 244
San Francisco, Ca. 94102-4689

RE: **2251 Greenwich Street Firehouse #16 Categorical Exemption Appeal**
May 19, 2015; Special Order 3:00 p.m.

Dear President Breed and Members of the Board:

INTRODUCTION

This office represents the adjacent neighbors to the proposed project at 2251 Greenwich Street. The proposed project is the complete demolition and new construction of Firehouse #16. The neighbors of this project have serious and longstanding concerns with the potential negative impact of the project on both their properties and health, and with the administrative approval process of this project that was improperly conducted to their prejudice.

The Appeal before the Board challenges the grant of a Categorical Exemption to a *known* hazardous waste site---a site with leaking underground storage tanks (UST). A site that is included on a list compiled pursuant to Section 65962.5 of the Government Code—that requires that the California State Department of Toxic Substance Control compile a list of all hazardous waste facilities and hazardous waste properties, including all sites with underground storage tanks for which an unauthorized release report has been filed. There is a specific Exception in the California Environmental Quality Act (CEQA) statutory scheme which precludes the issuance of a Categorical Exemption for such a site. (California Public Resources Code Section 21084(c)).

The normal course of a development project involves a private developer submitting plans to the City of San Francisco which then scrutinizes the plans to insure that the development complies with all applicable provisions of the Planning Code, zoning and environmental regulations. That is to say, normally the City acts as the gatekeeper to stop development projects which do not comply with the law from moving forward. Here the City, was and is, the developer; and because of this developer role, City officials conveniently lost sight of the normal (and more important) gatekeeper function.

The result has been that this project was improperly managed from the beginning. City officials intentionally failed to inform neighbors of public hearings and meetings at which the proposed project would be under discussion, as is required by law; and then misled the Boards and Commissions which reviewed the project and stated that public

notification had occurred. City officials also hid or obfuscated facts regarding the scope of the project and its environmental impact. This resulted in City Officials filling out paperwork which was inaccurate on its face, and constituted either gross incompetence or willful deceit on the part of public employees.

Despite the obfuscation of the public comment process by the City, and the fact that the Project Manager submitted forms which contained falsifications, and omitted reference to the removal of underground storage tanks, the project was still given a categorical exemption from review under CEQA.

The City Ignored the Hazardous Waste at the Site and Issued a Categorical Exemption.

The Project Manager was aware of the presence of the Leaking Underground Storage Tanks on this site from the beginning of the proposed project. The Project Manager noted that the project included the "replacement of an existing fuel tank" in her November 6, 2012 letter to the Planning Department, re: "CEQA Exemption Request for Station #16 Demolition-Reconstruction Project". Attached hereto as Exhibit 1.

Thus, the Project Manager was aware of the Underground Storage Tanks on the site on November 12, 2012. Despite this, on January, 23, 2013, the Project Manager filled out the CEQA Categorical Exemption Determination form (attached hereto as Exhibit 2) and did not check the box on the first page stating "Hazardous Materials: Would the project involve ... 2) soil disturbance; on a site with a former gas station, auto repair, dry cleaners, or heavy manufacturing use, or **on a site with underground storage tanks**." The form notes that if ANY box is initialed below, an *Environmental Evaluation Application* is required."

Despite the Fact that the Project Manager was aware that the site contained *Leaking* Underground Storage Tanks, she did not initial this box, and was not required to submit an Environmental Evaluation Application based on this false information. The Planning Department issued its Categorical Exemption from environmental review under CEQA on January 23, 2013.

After the Neighbors Objected, The City Admitted Its Error But Improperly Issued a Second Improper Cat Ex. For the Site.

Despite the failure of the Project Manager to disclose the presence of the USTs, and the failure to disclose that the re-grading of the 5,758 square foot site would move in excess of 5,000 square feet of soil and thus triggers the Maher Ordinance requirements, the project was granted a CEQA Categorical Exemption. Because the CEQA Categorical Exemption was, on its face, erroneously applied for and incorrectly issued, the adjacent neighbors were forced to object to the Categorical Exemption.

In response to the neighbor's objection, the Department "corrected" its Categorical Exemption and specified that the proposed project would be subject to soil and

groundwater remediation under the Maher Ordinance. The Department's Second Categorical Exemption, issued June 2, 2014, is also based on the incorrect conclusion that the Department is now *certain* that the site (a state-mapped toxic waste site and leaking underground storage tank site) does not present any *possibility* of an adverse environmental impact. See, San Francisco Planning Department CEQA Categorical Exemption Determination, June 2, 2014, attached hereto as Exhibit 6.

In light of the conditions of the site and the presence of numerous environmental hazards, the Department's "certainty" is alarming. Furthermore, the recent testing and analysis at the site shows the continued presence of many toxins. Millennium Consulting, Hazardous Materials report. Attached hereto Exhibit 3. The history of the site as a hazardous waste site and its proximity to the water table dictates that the Department should require a mitigation plan to be in place. Re-grading the soil and excavation of the USTs present at the site could expose construction personnel and the public to contamination present in the soil associated with historic on-site uses.

The Project has NEVER Been Publically Vetted and DPW Excluded the Neighbors from the Public Review Process

The Department of Public Works' Project Manager Gabriella Judd Cirelli was in frequent email and telephone contact with neighbors over the course of the review of this project. Ms. Cirelli was keenly aware that these and other neighbors of the proposed project had specific objections to the proposed project based on its negative impact on the air, light and space of their properties, as well as concerns regarding the environmental hazards associated with digging up the site of a known Leaking Underground Storage Tank.

Despite knowing of the concerns of the neighboring property owners, Ms. Cirelli deliberately failed to give the neighbors notice of the several presentations made to the Civic Design Review Committee, including the presentation for final approval before the full San Francisco Arts Commission on February 3, 2014. As a result, not a single neighbor of the proposed project attended any of these "public" hearings. San Francisco Arts Commission Civic Design Review Committee Agenda: Monday January 13, 2014. Attached hereto as Exhibit 4. Rather than answer to the public that they serve the Department of Public Works (DPW) staff manipulated the public hearing process to excise public comment.

The neighbors of the proposed project were denied the opportunity to comment on this project because they were not given the required written notice of public meetings and hearings. As a result they were unable to publically comment on a public building project which, in its current form, has major impacts on their private rights to air, light and privacy; in addition the neighbors were denied the ability to publically comment on the very real environmental concerns raised by the major excavation of a site on which underground petroleum leaks were reported in 1965 and 1987, and which recent environmental evaluations confirm contains numerous heavy metals, toxins and hazardous materials. The neighbors were unable to request mitigations or even voice their concerns, because the review process had been hidden from them by city

employees. A private developer, experienced with construction in San Francisco, would only dream of a design review process in which it could ignore adjacent neighbors and property owners. Only the City, as a developer, could make that dream a reality.

The Project site is listed as a Hazardous Waste Site, and is therefore statutorily excepted from the Categorical Exemption.

The Project site is listed on the State's Hazardous Waste and Substances Site List. See State Water Resources Control Board Geotracker Case Summary, Attached Hereto as Exhibit 5; cleanup and remedial action was twice rendered at the site due to leaking underground storage tanks. California Public Resources Code Section 21084(c) provides a specific exception to a Categorical Exemption if a site is listed on any of the State's Hazardous Waste lists. That section states: **"No Project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code shall be exempted from this division ...."**

The Project site's appearance on the list of the State's Hazardous Waste Sites precludes the categorical exemption that was again granted by the Department. As a matter of law, the categorical exemptions are to be narrowly defined. It cannot be said that this site has not appeared on ANY list of Hazardous Waste Sites; it has; and a broad based reading of this exception and the site's appearance on the list (past or present) precludes the use of categorical exemption. In order to grant to this site a Categorical Exemption, the Department offers its own "interpretation" of the above code section without reference to any supporting case law or guidelines for the interpretation.

One of the basic principals governing the application of CEQA is that the statute and the guidelines be interpreted as broadly as possible in order to provide the maximum protection to the environment and to the people of California. In the first case to interpret CEQA, the California Supreme Court made it clear that ambiguous language found in the statute was to be applied broadly rather than narrowly. In *Friends of Mammoth v. Board of Supervisors,* 8 Cal.3rd 247 (1972), Justice Stanley Mosk wrote that the Act (CEQA) is to be interpreted and construed so as to give the environment the fullest protection possible. This analysis, now known as the "Mammoth interpretive principle" was based on the legislative statements of intent and is still applicable today.

The Department's narrow interpretation of Section 15300.2 is incorrect as a matter of law and violates the principles of CEQA requiring broad interpretation of its provisions. Because the Project site is included on one of the State's Hazardous Waste lists, it is not eligible for a Categorical Exemption. The Department's response to this appeal, does not dispute the accuracy of the above interpretation of the rules of application of CEQA. Instead the department asserts that the "site's listing on a "Cortese List" does not necessarily preclude the issuance of a categorical exemption when a closure letter ... has been issued." The Department's response goes on to point out that once a site is placed on a "Cortese List" it is never removed. The response then theorizes, "[o]ne of the possible reasons why sites remain on the Cortese List is because remediation techniques may include capping the site (or containment of the hazardous material) so that the

hazardous material no longer presents a risk to humans or the environment. However, a subsequent project that includes **excavation** or would otherwise disturb that containment, could expose the public and the environment to hazardous materials within the soil/groundwater that **were previously contained.**" Planning Department Response to BOS Categorical Exemption Appeal, page 5-7.

This explanation for why a site remains on a "Cortese List" even after a case closure letter has been issued is very important in this case. In this case the Planning Department has stated that this site is not excepted from Categorical Exemption from CEQA Review because, although it is on a Cortese list, its status on this list is as a "closed case". The Planning Department response then points out that the reason that a closed case remains on the Cortese list is because "a subsequent project that includes excavation or would otherwise disturb that containment, **could** expose the public and the environment to hazardous materials within the soil/groundwater that were previously contained."

The proposed project includes the complete re-grading of the project site, and the removal of a 600 gallon and a 3,000 gallon underground storage tanks (USTs). The proposed project therefore proposes to move over 5,000 square feet of surface soil, triggering both the Maher Ordinance reporting requirements and compliance with the Storm-Water Management Ordinance. This is exactly the type of "subsequent project" that "includes excavation" which "**could** expose the public and the environment to hazardous materials ... that were previously contained." This site remains on the "Cortese list" because it remains a potential environmental hazard. The San Francisco Department of Public Health requires permits for the removal of the USTs be issued by the Hazardous Materials Unified Program Agency, the San Francisco Fire Department and the Department of Public Works because the site remains a potential environmental hazard. The designation as a "closed case" does not mean that the site is clean, or safe; it means that the hazard has been temporarily contained. The excavations proposed at this site are exactly the type of site alterations which would alter this containment, and this is why known Leaking Underground Storage Tanks remain on the Cortese Lists after such leaks are contained.

The placement of the proposed project site on the Cortese list was required by California Government Code Section 65962.5(c)(1), which states, "The State Water Resources Control Board shall compile ... a list of all of the following: ... All underground storage tanks for which an unauthorized release report is filed pursuant to Section 25295 of the Health and Safety Code. Unauthorized releases from the UST at the project site were reported in 1965 and 1987 according to the State Water Resources Control Board's Geotracker website. Exhibit 5. These two documented unauthorized releases qualify the project as a Hazardous Waste Site for the purposes of CEQA Sec 15300.2(e), which states, "[a] categorical exemption **shall not** be used for a project located on a site which is included on **any** list compiled pursuant to Section 65962.5 of the Government Code." A plain reading of the CEQA statute thereby demands that no Categorical Exemption be issued for the proposed project, because it is a Hazardous Waste Site under Government Code Sec 65962.5(c)(1).

London Breed, President
San Francisco Board of Supervisors

2251 Greenwich Street
Firehouse #16 ;May 11, 2015

The Site Can Never Meet the High Standard Of "Certainty" of "No Possibility" of an Adverse Environmental Impact.

The Department also relies on another provision of CEQA which has been incorrectly applied and interpreted. Section 15061(b)(3) provides that a Project may be given a Categorical Exemption if it can be said with **certainty** that there is **no possibility** of an adverse environmental impact. By definition, in issuing the second Categorical Exemption, the Department is saying, with absolute certainty, that there is no possibility that construction activity will have a significant effect on the environment.

The location, size and type of the proposed construction makes it impossible to determine with certainty that there is no possibility of an adverse environmental impact. The Department's analysis treats this property as if it was any other site and completely ignores the long history of toxic and hazardous materials at the site. Given the two reported petroleum leaks at the site (one of which took a decade to be declared "closed"), it is certainly a "possibility" that toxics are still present on the property at unacceptable levels. In fact, the recent testing done by the City confirms this. Exhibit 3. It is also reasonable to assume that the excavation of the entire lot might release some of those toxins into the surrounding environment (perhaps without even knowing it). In light of the site's history, it is ridiculous to proceed with this project without putting in place a mitigation plan, to deal with the highly likely release of environmental contaminants. The Department should require a mitigation plan for such a contingency to be in place. The blanket categorical exemption which has been issued is patently not appropriate.

The location, size and type of the proposed construction is an unusual circumstance that represents an exception to the Categorical Exemption approval. The building is much larger than any building constructed in the area, and therefore could cause significant environmental disruption both in terms of air, land and noise, but also of the resulting effects on the neighborhood and the social and physical environment. The location's proximity to schools, children and the tourist destinations of visitors to San Francisco further disqualifies it for categorical exemption under the code, and is a compelling argument for a greater standard of environmental review.

Conclusion

For these reasons, we appeal the granting of a categorical exemption by the San Francisco City Planning Department to the Project sponsor, DPW. We respectfully request that the San Francisco Board of Supervisors require the current Building's demolition and the construction of any new building on the lot to undergo environmental mitigation review as required by CEQA.

VERY TRULY YOURS,

Stephen M. Williams

London Breed, President
San Francisco Board of Supervisors

2251 Greenwich Street
Firehouse #16 ;May 11, 2015

EXHIBIT 1

City and County of San Francisco

Edwin M. Lee, Mayor
Mohammed Nuru, Director

San Francisco Department of Public Works
Office of the Deputy Director & City Engineer, Fuad Sweiss
Infrastructure Design and Construction
30 Van Ness Avenue
San Francisco, CA 94102
(415) 557-4700 ■ www.sfdpw.org

Patrick Rivera, Division Manager

November 6, 2012

San Francisco Planning Department
1650 Mission Street, Fourth Floor
San Francisco, CA 94103

RE: CEQA Exemption Request for Station #16 Demolition-Reconstruction Project

Dear San Francisco Planning Department:

The San Francisco Department of Public Works (SFDPW), on behalf of the San Francisco Fire Department (SFFD), requests review of the proposed Station #16 Demolition-Reconstruction Project (project) under the California Environmental Quality Act (CEQA). The purposes of this letter are to: 1) Provide the Environmental Planning Division (EP) with information on the proposed project; and 2) Request EP review and concurrence that the project is categorically exempt under CEQA.

CEQA Guidelines Section 15302 provides exemptions for "Replacement or Reconstruction. Class 2 consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced." The San Francisco Planning Department has clarified that "replacement and reconstruction of industrial, institutional, and public structures and facilities within the limitations stated including construction undertaken to meet seismic safety standards" are under the Class 2 exemptions in the "List of Projects that are Generally Categorically Exempt from Review Under the California Environmental Quality Act (CEQA)" adopted by the Planning Commission August 17, 2000.

The following description of the proposed activities demonstrates the proposed project would not result in any adverse environmental effects, and provides support for our recommendation that the activities are categorically exempt under CEQA.

BACKGROUND

The purposes of the proposed project are: (1) to provide a facility that is able to withstand seismic activity and other catastrophic events; and (2) to provide an adequate fire station facility to meet San Francisco's fire services operational requirements.

reading the city's infrastructure, and by ensuring the necessary coordination is in place for a ready response
    - Policy 2.7 - Continue to expand the City's fire department prevention and firefighting capability with sufficient personnel and training
- Objective 3: Establish strategies to address the immediate effects of a disaster

Second, the proposed project results in a new two-story fire station building located on the same site (lot area 5,758 sq. ft) as the structure replaced. The fire station will be built within existing zoning and height/bulk requirements of P-Public and 40-X, respectively. The site is adequately served by all required utilities and public services.

DESCRIPTION OF THE PROPOSED PROJECT

The proposed project involves the demolition and reconstruction of Fire Station 16. The proposed project will result in a two story 10,398 sq ft building (existing square footage is 10,272 sq ft), with a 5,780 sq. ft first floor and a 4,668 sq. ft second floor. The project calls for three main types of programmed spaces: (1) Apparatus bay and support, (2) Firefighter operations, and (3) Living quarters. The project also includes a replacement roof top generator and replacement of an existing fuel tank. The area sub-components are outlined below:

- (1) Apparatus bay and support
    - Apparatus bays
    - Turnout storage area
    - Turnout drying room
    - Specialty gear storage
    - Shop/workroom
- (2) Firefighter operations
    - Fire station lobby/front desk
    - Communication room
    - Public restroom
    - Library
    - Firefighter study/report writing room
    - Communication alcove
    - Janitor's closet
- (3) Living Quarters
    - Officer's quarters
    - Firefighter bedrooms
    - Swing locker room
    - Individual firefighter restrooms with showers
    - Kitchen/dining room
    - Dining room
    - Pantry
    - Laundry room

constructing a second story addition at the east side, and the south end of the building, and conducting interior alterations and upgrades. Therefore, the proposed project would not have an adverse impact on the resource as the current structure no longer retains its original features and its otherwise individually ineligible.

CEQA Compliance/Recommendation

Based on the above description, the SFDPW recommends EP determine the proposed Project categorically exempt under CEQA Guidelines Section 15302. The Planning Department provides that "replacement and reconstruction of industrial, institutional, and public structures and facilities within the limitations stated including construction undertaken to meet seismic safety standards" are exempt in the "List of Projects that are Generally Categorically Exempt from Review Under the California Environmental Quality Act (CEQA)" adopted by the Planning Commission August 17, 2000.

If you have any questions, please contact Frank Filice, Manager of Regulatory Affairs at (415) 558-4011. Thank you for your cooperation.

Sincerely,

Frank Filice, Manager of Regulatory Affairs
SFDPW Infrastructure Design & Construction

Cc: Gabriella Judd-Cirelli, SFDPW- BDC

Attachment A – Station #16 DPR 523A and B Forms (Page & Turnbull, February 2012).

CEQA Categorical Exemption Determination

SAN FRANCISCO
PLANNING
DEPARTMENT

Property Information/Project Description

PROJECT ADDRESS: 2251 Greenwich St

BLOCK/LOT(S): 0515/031

CASE NO.: 2012.1436

PERMIT NO.:

PLANS DATED:

☐ Addition/ Alteration (detailed below) ☒ Demolition (requires HRER if over 50 years old) ☒ New Construction

STEP 1 EXEMPTION CLASS

☐ **Class 1: Existing Facilities**
Interior and exterior alterations; additions under 10,000 sq.ft.; change of use if principally permitted or with a CU.

☐ **Class 3: New Construction**
Up to three (3) single family residences; six (6) dwelling units in one building; commercial/office structures under 10,000 sq.ft.; accessory structures; utility extensions.

Class 2: Replacement or Reconstruction
Existing structures & facilities where the new structure will be located on the same site as the structure replaced & will have substantially the same purpose & capacity.

NOTE: If neither class applies, an *Environmental Evaluation Application* is required.

STEP 2 CEQA IMPACTS (To be completed by Project Planner)

If ANY box is initialed below an *Environmental Evaluation Application* is required.

_____ **Transportation:** Does the project create six (6) or more net new parking spaces or residential units? Does the project have the potential to adversely affect transit, pedestrian and/or bicycle safety (hazards) or the adequacy of nearby transit, pedestrian and/or bicycle facilities?

_____ **Air Quality:** Would the project add new sensitive receptors (specifically, schools, colleges, universities, day care facilities, hospitals, residential dwellings [subject to Article 38 of the Health Code], and senior-care facilities)?

_____ **Hazardous Materials:** Would the project involve 1) change of use (including tenant improvements) and/or 2) soil disturbance; on a site with a former gas station, auto repair, dry cleaners, or heavy manufacturing use, or on a site with underground storage tanks?
Phase I Environmental Site Assessment required for CEQA clearance *(E.P. initials required)*

_____ **Soil Disturbance/Modification:** Would the project result in the soil disturbance/modification greater than two (2) feet below grade in an archeological sensitive area or eight (8) feet in non-archeological sensitive areas?
Refer to: EP ArcMap > CEQA CatEx Determination Layers > Archeological Sensitive Areas

_____ **Noise:** Does the project include new noise-sensitive receptors (schools, colleges, universities, day care facilities, hospitals, residential dwellings, and senior-care facilities) fronting roadways located in the noise mitigation area?
Refer to: EPArcMap > CEQA CatEx Determination Layers > Noise Mitigation Area

_____ **Subdivision/Lot-Line Adjustment:** Does the project site involve a subdivision or lot-line adjustment on a lot with a slope of 20% or more?
Refer to: EP ArcMap > CEQA CatEx Determination Layers >Topography

Per GIS, screening the only CEQA associated issue is historic preservation

NOTE:
Project Planner must initial box below before proceeding to Step 3.

Project Can Proceed With Categorical Exemption Review.

The project does not trigger any of the CEQA Impacts and can proceed with categorical exemption review.

GO TO STEP 3 AV 1/23/2013

STEP 3 PROPERTY STATUS - HISTORICAL RESOURCE

Property is one of the following: (Refer to: San Francisco Property Information Map)

☐ Category A: Known Historical Resource GO TO STEP 5

☒ Category B: Potential Historical Resource (over 50 years of age) GO TO STEP 4

☐ Category C: Not a Historical Resource or Not Age Eligible (under 50 years of age) GO TO STEP 5

STEP 4 PROPOSED WORK CHECKLIST (To be completed by Project Planner)

If condition applies, please initial.

_____ 1. **Change of Use and New Construction** (tenant improvements not included).

_____ 2. **Interior alterations/interior tenant improvements.** Note: Publicly-accessible spaces (i.e. lobby, auditorium, or sanctuary) require preservation planner review.

_____ 3. **Regular maintenance and repair** to correct or repair deterioration, decay, or damage to the building.

_____ 4. **Window replacement** that meets the Department's *Window Replacement Standards* (does not includ storefront window alterations).

_____ 5. **Garage work,** specifically, a new opening that meets the *Guidelines for Adding Garages and Curb Cuts*, and/or replacement of garage door in an existing opening.

_____ 6. **Deck, terrace construction, or fences** that are not visible from any immediately adjacent public right-of-way.

_____ 7. **Mechanical equipment installation** not visible from any immediately adjacent public right-of-way.

_____ 8. **Dormer installation** that meets the requirements for exemption from public notification under *Zoning Administrator Bulletin: Dormer Windows*.

_____ 9. **Additions** that are not visible from any immediately adjacent public right-of-way for 150' in each direction; does not extend vertically beyond the floor level of the top story of the structure or is only a single story in height; does not have a footprint that is more than 50% larger than that of the original building; and does not cause the removal of architectural significant roofing features.

NOTE:
Project Planner must check box below before proceeding.

☒ Project is not listed: GO TO STEP 5

☐ Project does not conform to the scopes of work: GO TO STEP 5

☐ Project involves 4 or more work descriptions: GO TO STEP 5

☐ Project involves less than 4 work descriptions: GO TO STEP 5

STEP 5 CEQA IMPACTS - ADVANCED HISTORICAL REVIEW (To be completed by Preservation Planner)

If condition applies, please initial.

_____ 1. Project involves a **Known Historical Resource (CEQA Category A)** as determined by Step 3 and conforms entirely to Scope of Work Descriptions listed in Step 4. (Please initial scopes of work in STEP 4 that apply.)

_____ 2. **Interior alterations to publicly-accessible spaces.**

3. **Window replacement** of original/historic windows that are not "in-kind" but are is consistent with existing historic character.

4. **Façade/storefront alterations** that do not remove, alter, or obscure character-defining features.

5. **Raising the building** in a manner that does not remove, alter, or obscure character-defining features.

6. **Restoration** based upon documented evidence of a building's historic condition, such as historic photographs, plans, physical evidence, or similar buildings.

7. **Addition(s)**, including mechanical equipment that are minimally visible from a public right of way and meets the *Secretary of the Interior's Standards for Rehabilitation*.

8. **Other work consistent** with the *Secretary of the Interior Standards for the Treatment of Historic Properties*

Specify:

*AV 9. **Reclassification of property status** to Category C

a. Per Environmental Evaluation Evaluation, dated:

* *Attach Historic Resource Evaluation Report*

b. Other, please specify: Per HRER dated 12/28/2012

* *Requires initial by Senior Preservation Planner / Preservation Coordinator*

NOTE:
If ANY box is initialed in STEP 5, Preservation Planner MUST review & initial below.

Further Environmental Review Required.

Based on the information provided, the project requires an *Environmental Evaluation Application* to be submitted.

GO TO STEP 6

Preservation Planner Initials

Project Can Proceed With Categorical Exemption Review.

The project has been reviewed by the Preservation Planner and can proceed with categorical exemption review.

GO TO STEP 6 AV

Preservation Planner Initials

STEP 6 CATEGORICAL EXEMPTION DETERMINATION (To be completed by Project Planner)

AV ☒ **Further Environmental Review Required.**
Proposed Project does not meet scopes of work in either:

(check all that apply)

☐ Step 2 (CEQA Impacts) or

☐ Step 5 (Advanced Historical Review)

STOP!

Must file *Environmental Evaluation Application*.

AV ☒ **No Further Environmental Review Required.** Project is categorically exempt under CEQA.

Allison Vanderslice
Planner's Signature

1/23/2013
Date

Allison Vanderslice
Print Name

Once signed and dated, this document constitutes a categorical exemption pursuant to CEQA Guidelines and Chapter 31 of the Administrative Code.

EXHIBIT 2

SAN FRANCISCO
PLANNING DEPARTMENT

Historic Resource Evaluation Response

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Date	December 28, 2012
Case No.:	2012.1443E
Project Address:	2251 Greenwich Street (Station #16)
Zoning:	P (Public) 40-X Height and Bulk District
Block/Lot:	0515/031
Staff Contact:	Allison Vanderslice, Preservation Planner (415) 575 - 9075 allison.vanderslice@sfgov.org

PART I: HISTORIC RESOURCE EVALUATION

Buildings and Property Description

The subject parcel is located on the south side of Greenwich Street between Steiner Street and Fillmore Street in the Marina District. The property is San Francisco Fire Station #16 and is located within a P (Public) Zoning District and a 40-X Height and Bulk District.

2251 Greenwich Street was constructed in 1938 in the Spanish Eclectic / Mission Revival style as a fire station for the San Francisco Fire Department (SFFD). In 1955-56 the building underwent a major renovation funded by the 1952 Firehouse Bond. The two-story, reinforced concrete fire station is now in the altered Modern style. The irregular plan building is topped with a gable roof toward the north (primary façade), a narrow flat-roofed addition at the east, a shed roof at the center, a flat-roofed deck toward the south, and flat-roofed, one story kitchen wing at the southwest corner. The cladding is stucco and fenestration is primarily multi-lite, fixed metal sash windows. The primary façade (north) contains two rectangular apparatus room openings with metal roll-up doors.

Pre-Existing Historic Rating / Survey

The subject property is not included on any historic resource surveys or listed on any local, state or national registries. The building is considered a "Category B" property (Properties Requiring Further Consultation and Review) for the purposes of the Planning Department's California Environmental Quality Act (CEQA) review procedures due to its age (constructed in 1938).

Neighborhood Context and Description

The subject parcel is within a mixed-use district comprised primarily of mulit-family residences with some commercial buildings closer to Fillmore Street in the Cow Hollow neighborhood of the Marina District. The majority of buildings on the subject block face were constructed in the early 20th century and are interspersed with some later development. The area does not appear to constitute a cohesive collection of styles or types. Prior to the construction of Station #16 in 1938, the lot was occupied by three commercial buildings fronting on Greenwich Street with residential in the rear fronting on Pixley Street. 2251 Greenwich Street was constructed in 1938 for Engine 20, which was relocated from 2666 Lombard Street, several blocks to the west of the subject parcel.

CEQA Historical Resource(s) Evaluation

Step A: Significance

Under CEQA section 21084.1, a property qualifies as a historic resource if it is "listed in, or determined to be eligible for listing in, the California Register of Historical Resources." The fact that a resource is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources or not included in a local register of historical resources, shall not preclude a lead agency from determining whether the resource may qualify as a historical resource under CEQA.

Individual		Historic District/Context	
Property is individually eligible for inclusion in a California Register under one or more of the following Criteria:		Property is eligible for inclusion in a California Register Historic District/Context under one or more of the following Criteria:	
Criterion 1 - Event:	☐ Yes ☒ No	Criterion 1 - Event:	☐ Yes ☒ No
Criterion 2 - Persons:	☐ Yes ☒ No	Criterion 2 - Persons:	☐ Yes ☒ No
Criterion 3 - Architecture:	☐ Yes ☒ No	Criterion 3 - Architecture:	☐ Yes ☒ No
Criterion 4 - Info. Potential:	☐ Yes ☒ No	Criterion 4 - Info. Potential:	☐ Yes ☒ No
Period of Significance:		Period of Significance: ☐ Contributor ☐ Non-Contributor	

Based on the information provided in the attached DPR form prepared by Page & Turnbull for the subject property, dated February 15, 2012, and the information found in the Planning Department's records, Department staff finds that the subject building is not individually eligible for inclusion on the California Register and does not contribute to the San Francisco 1952 Firehouse Bond Act Thematic Historic District or any other eligible historic district.

Constructed in 1938, Station #16 was built during the term of Chief Charles J. Brennan (1929-1943). Due to the Great Depression, the early years of Brennan's term required deep cuts to the fire department and a halt on all building programs and even standard maintenance until the formation of the Works Project Administration.[1] The highlights of Brennan's tenure were not associated with any notable construction programs but with the restructuring of the SFFD. Specifically, Brennan increased the responsibility and importance of the Bureau of Fire Prevention and Public Safety and established seven permanent inspectors.[2] Few other changes occurred at the Department during the late 1930s prior to new responsibility associated with the 1939-1940 World Fair.[3] For additional information on the history of the SFFD, see the attached DPR form prepared by Page & Turnbull.

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[1] "Historical Review, Part II: The Paid Department." *San Francisco Fire Department Museum,* Accessed December 28, 2012: http://guardiansofthecity.org/sffd/history/paid_department.html

[2] "Charles J. Brennan, Chief Engineer, 1929-43." *San Francisco Fire Department Museum,* Accessed December 28, 2012: http://guardiansofthecity.org/sffd/history/paid_department.html

[3] "Historical Review" *San Francisco Fire Department Museum.*

San Francisco 1952 Firehouse Bond Act Thematic Historic District

A Historic Resource Evaluation Report prepared by Page & Turnbull in March 2010 for 676 Howard Street (Station #1) identified 14 firehouses as constituting a potential discontiguous thematic historic district that is significant under Criterion 1 (Events) and Criterion 3 (Architecture).[4] The proposed district is notable for the strong collection of International Style firehouses and as the largest firehouse building campaign undertaken by the City of San Francisco. The period of significance relates to the construction campaign authorized by the 1952 Firehouse Bond Act that dates from 1952 to 1961. The firehouse inventory compiled by Page & Turnbull for the proposed discontiguous district includes firehouses that were built between 1953 and 1961 in the International Style and does not include existing stations that were altered or upgraded during that period. While the subject property underwent major alterations in 1955-1956 as part of the construction campaign, the building is clearly a stripped down version of its earlier style and is not an example of the International Style. 2251 Greenwich Street does not contain the character-defining features of the district nor did it significantly contribute to the modernization of the SFFD and, therefore, it is not a contributing property to the San Francisco 1952 Firehouse Bond Act Thematic Historic District.

Criterion 1: Property is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

Constructed in 1938, the subject property does not appear to be associated with any events significant in the history of the SFFD or San Francisco generally. While Station #16 was renovated in the mid-1950s as part of the 1952 Firehouse Bond Act, this association is not significant in the broader trend of the modernization of the SFFD. Therefore, Staff finds that the subject property is not associated with any historically significant events and is not eligible for inclusion on the California Register individually or as a contributor to a potential historic district under Criterion 1.

Criterion 2: Property is associated with the lives of persons important in our local, regional or national past.

Records do not indicate that any persons significant in the local, regional or national past are associated with the subject property. The station was constructed during the tenure of Chief Brennan but does not appear to be associated with him directly or with the main achievements of his career. Therefore, the subject property is not eligible under Criterion 2.

Criterion 3: Property embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values.

The property was constructed in 1938 as a firehouse in the Spanish Eclectic style. The original architect and builder were not identified. The building underwent a major alteration in 1955-56 which included the following changes: the façade was reclad and stripped of all ornamentation; the apparatus room openings were converted from arched openings to rectangle openings; and all windows and doors were replaced. Due to these alterations, the building is no longer a good example of the Spanish Eclectic style. Although the building underwent a major alteration in the 1950s, it is not a good example of the International Style or Modern-period architecture generally, particularly with the gable roof. Therefore, it is not a good

[4] Page & Turnbull, *Historic Resources Evaluation for SFFD Station No. 1, 676 Howard Street, San Francisco, California*, March 31, 2010. A copy of this report is on file with the Planning Department at 1650 Mission Street, Suite 400 and is available for public review as part of project file 2009.0291E.

example of a type, period, or method of construction. Nor does the building possess high artistic values. Lastly, the building does not contribute to a grouping of similar buildings. As outlined above, the building does not contribute to the San Francisco 1952 Firehouse Bond Act Thematic Historic District nor does the surrounding block appear to be a potential historic district. Therefore, the subject property does not appear to be eligible for listing on the California Register as an individual resource or as a contributor to a historic district under Criterion 3.

Criterion 4: Property yields, or may be likely to yield, information important in prehistory or history.
Based upon a review of information in the Departments records, the subject property is not significant under Criterion 4, which is typically associated with archaeological resources. Furthermore, the subject property is not likely significant under Criterion 4, since this significance criteria typically applies to rare construction types when involving the built environment. The subject property is not an example of a rare construction type.

Step B: Integrity
To be a resource for the purposes of CEQA, a property must not only be shown to be significant under the California Register of Historical Resources criteria, but it also must have integrity. Integrity is defined as "the authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's period of significance." Historic integrity enables a property to illustrate significant aspects of its past. All seven qualities do not need to be present as long the overall sense of past time and place is evident.

The subject property has retained or lacks integrity from the period of significance noted in Step A:

Location:	☐ Retains	☐ Lacks	Setting:	☐ Retains	☐ Lacks
Association:	☐ Retains	☐ Lacks	Feeling:	☐ Retains	☐ Lacks
Design:	☐ Retains	☐ Lacks	Materials:	☐ Retains	☐ Lacks
Workmanship:	☐ Retains	☐ Lacks			

Since 2251 Greenwich Street was determined not to meet any of the criteria that would identify it as eligible for the California Register of Historical Resources, analysis of integrity was not conducted.

Step C: Character Defining Features
If the subject property has been determined to have significance and retains integrity, please list the character-defining features of the building(s) and/or property. A property must retain the essential physical features that enable it to convey its historic identity in order to avoid significant adverse impacts to the resource. These essential features are those that define both why a property is significant and when it was significant, and without which a property can no longer be identified as being associated with its significance.

Since 2251 Greenwich Street was determined not to meet any of the criteria that would identify it as eligible for the California Register of Historical Resources, this analysis was not conducted.

CEQA Historic Resource Determination

☐ Historical Resource Present
- ☐ Individually-eligible Resource
- ☐ Contributor to an eligible Historic District
- ☐ Non-contributor to an eligible Historic District

☒ No Historical Resource Present

PART I: SENIOR PRESERVATION PLANNER REVIEW

Signature: _____ Date: 1-16-2013

Tina Tam, *Senior Preservation Planner*

IMAGE

Source: Page & Turnbull, February 2012

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code
Other Listings
Review Code Reviewer Date

Page 1 of 9 **Resource name(s) or number**(assigned by recorder) 2251 Greenwich Street

P1. Other Identifier:
***P2. Location:** ☐Not for Publication ☒Unrestricted ***a. County** San Francisco
***b. USGS 7.5' Quad** San Francisco North, Calif. **Date:** 1995
***c. Address** 2251 Greenwich Street **City** San Francisco **Zip** 94123
***e. Other Locational Data:** Assessor's Parcel Number Block: 0515 Lot: 031

***P3a. Description:** (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries.)

2251 Greenwich Street occupies a 48' x 120' lot on the south side of Greenwich Street, between Steiner and Fillmore Streets. Built in 1938, the two-story, reinforced concrete fire station is designed in an altered Modern style. The irregular-plan building is clad in smooth stucco. It is capped by a gable roof toward the north, a narrow flat-roofed addition at the east, a shed roof at the center, a flat-roofed deck toward the south, and a flat-roofed kitchen wing at the southwest corner. The primary façade faces north. It features a four-light steel-sash hopper window behind a metal grille at the first story, as well as two apparatus room (garage) openings with roll-up metal doors. One four-light steel-sash hopper window and two three-part multi-light steel-sash awning windows are located at the second story. The façade terminates in a metal vent in the gable end and a simple cornice and concrete parapet. The primary entrance is located in a recessed bay to the west, and is accessed through a metal gate within a scored stucco concrete wall. A brick walkway leads to a shed-roofed entrance portico, which features original decorative wood posts, a carved arched opening, and brackets. The entrance contains a partially glazed metal replacement door.
(Continued)

***P3b. Resource Attributes:** (list attributes and codes) HP14. Government Building

***P4. Resources Present:** ☒Building ☐Structure ☐Object ☐Site ☐District ☐Element of District ☐Other

P5a. Photo

P5b. Photo: (view and date)
View from north (13 February 2012)

***P6. Date Constructed/Age and Sources:** ☒historic
1938 (SFFD Museum)

***P7. Owner and Address:**
San Francisco City Property
25 Van Ness Avenue
San Francisco, CA 94102

***P8. Recorded by:**
Page & Turnbull, Inc.
1000 Sansome Street, Suite 200
San Francisco, CA 94111

***P9. Date Recorded:**
2/15/2012

***P10. Survey Type:**
Intensive

***P11. Report Citation:** (Cite survey report and other sources, or enter "none")
None

***Attachments:** ☐None ☐Location Map ☐Sketch Map ☒Continuation Sheet ☒Building, Structure, and Object Record ☐Archaeological Record ☐District Record ☐Linear Feature Record ☐Milling Station Record ☐Rock Art Record ☐Artifact Record ☐Photograph Record ☐ Other (list)

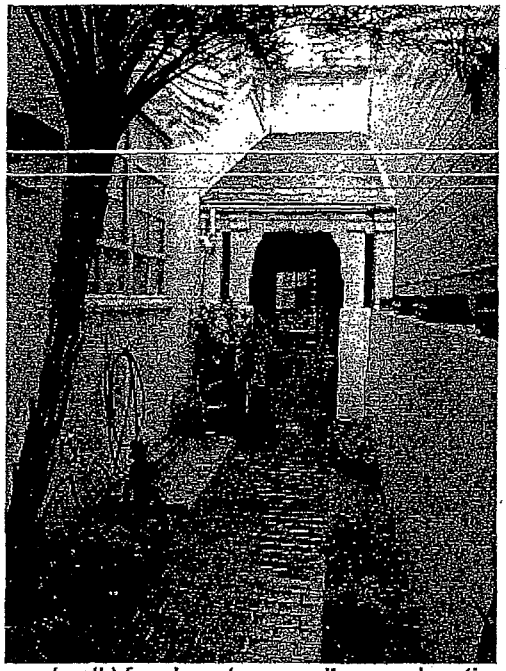
DPR 523A (1/95) ***Required information**

P3a. Description (continued)

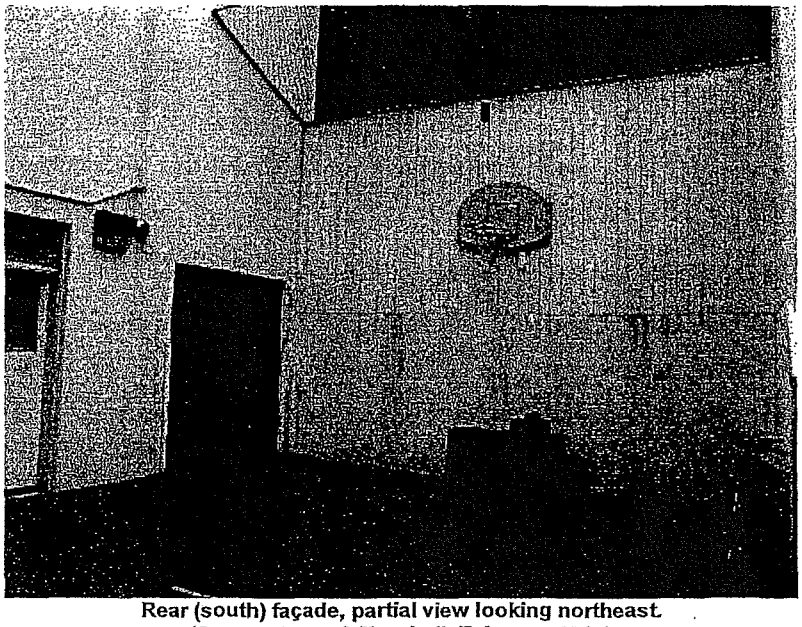
The east façade abuts the adjacent building and, where exposed, is clad in stucco and horizontal wood siding. The west façade abuts the adjacent building toward the south, and the façade facing the entrance walkway features multi-light steel-sash awning windows and terminates in original wood eaves with carved wood brackets. The first story of the rear (south) façade contains two partially glazed metal doors with glazed transoms, a four-light steel-sash window, and paired wood doors with metal strap hinges. The second story features four six-light steel-sash awning windows. A concrete hose tower is located at the east end of the façade and features decorative concrete vents toward the top. It is capped by a hip roof and is accessed via the rooftop deck at the back of the building. A one-story, flat roofed kitchen wing projects from the west end of the rear façade, and features six-light steel-sash awning windows on the east façade. The backyard is paved with concrete and contains a generator and a basketball court.

Though the interior has been largely modified, it does contain an original wood staircase with turned balusters and some original paneled wood doors.

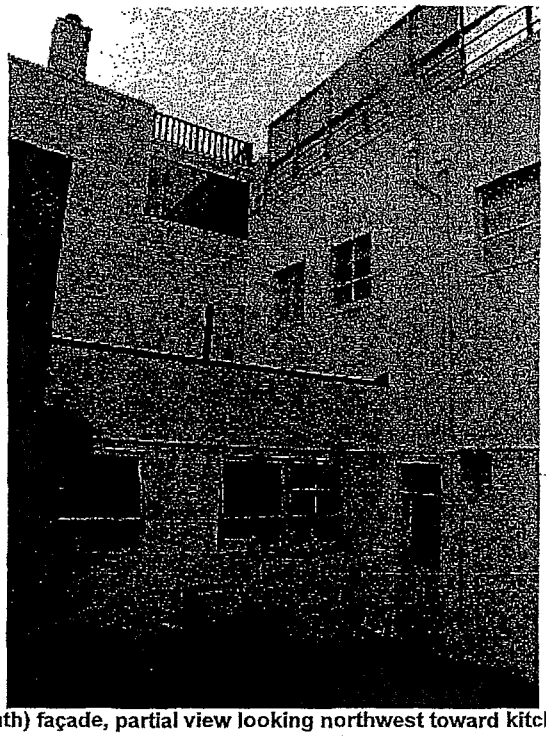
This building appears to be in good condition.



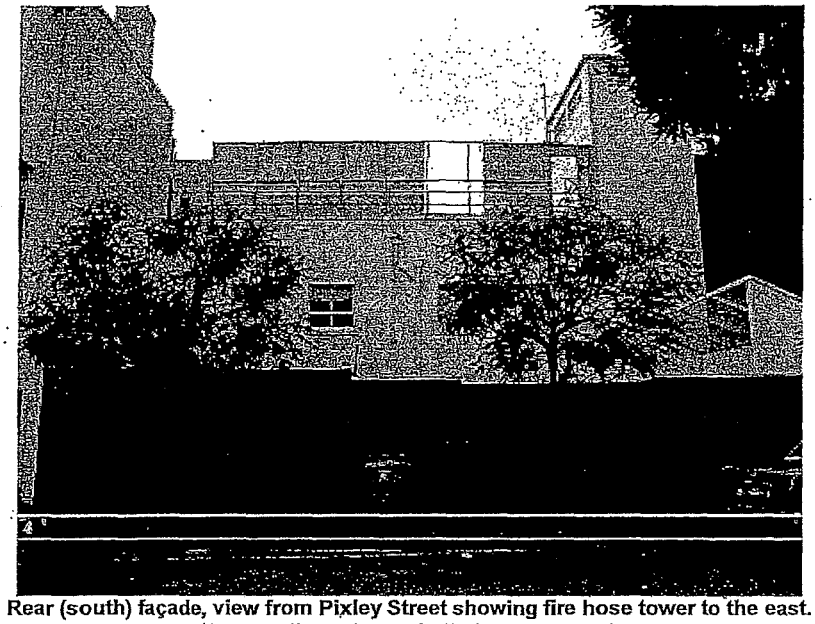
West end of primary (north) façade, entrance walkway and portico, looking south.
(Source: Page & Turnbull, February 2012)



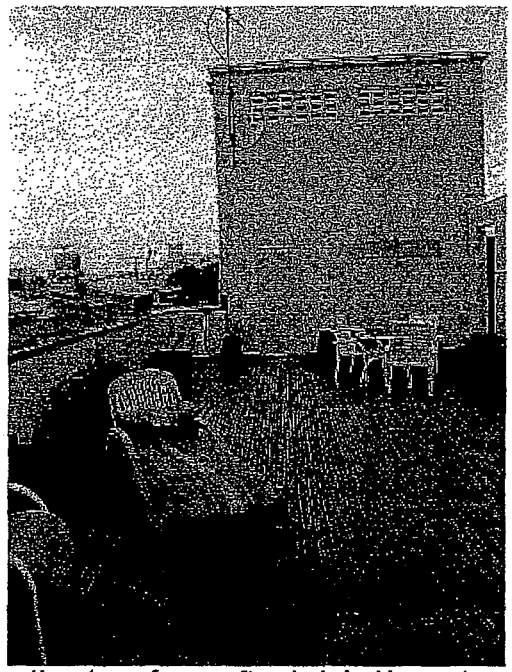
Rear (south) façade, partial view looking northeast.
(Source: Page & Turnbull, February 2012)



Rear (south) façade, partial view looking northwest toward kitchen wing.
(Source: Page & Turnbull, February 2012)



Rear (south) façade, view from Pixley Street showing fire hose tower to the east.
(Source: Page & Turnbull, February 2012)



Hose tower from rooftop deck, looking east.
(Source: Page & Turnbull, February 2012)

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
Primary #_____
HRI#_____

BUILDING, STRUCTURE, AND OBJECT RECORD

*NRHP Status Code 6Z
*Resource Name or # 2251 Greenwich Street

B1. Historic name: San Francisco Fire Department Engine No. 20
B2. Common name: San Francisco Fire Department Station 16
B3. Original Use: Fire station B4. Present use: Fire Station
***B5. Architectural Style:** altered Modern
***B6. Construction History:** (Construction date, alterations, and date of alterations)

- Constructed in 1938 in a Spanish Eclectic style
- Conversion of apparatus room arched openings to rectangular openings; re-cladding of primary façade; removal of buttresses, cornice, and clay tile roof; replacement of all windows; replacement of doors; construction of second-story additions on east side and south end (1955-1956; no permits on file)
- Removal of all existing roofing and installation of new built-up roofing system and waterproofing at roof edges (June 1994, Permit #746387)
- General interior remodeling of dormitory and toilet/locker rooms; mechanical and electrical system upgrade; women's facilities; and ADA-accessibility on first floor (December 1994, Permit #767920)
- New overhead apparatus room doors (Drawing elevation, 1994)

***B7. Moved?** ☒No ☐Yes ☐Unknown **Date:**_____ **Original Location:**_____
***B8. Related Features:** None.

B9a. Architect: Unknown b. Builder: Unknown
***B10. Significance: Theme** Infrastructure and Government Services Development **Area** Cow Hollow
Period of Significance N/A **Property Type** Fire Station **Applicable Criteria** N/A
(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity)

2251 Greenwich Street was constructed in 1938 as a fire station for the City of San Francisco Fire Department (SFFD). It is a single engine station. The original architect and builder are unknown. The fire station is located in the Cow Hollow neighborhood, a mixed-use district of commercial buildings and residences originally developed during the nineteenth century.

The Paid Fire Department of the City and County of San Francisco went into active operation on 3 December 1866, before which it was operated entirely on a volunteer basis. The Fire Department's third Chief Engineer, David Scannell, assumed the office in 1871 and held the position until his death in 1893. He recommended limiting frame buildings to sixty feet in height and installing fire escapes and standpipes on tall buildings. San Francisco was expanding rapidly, and Chief Scannell took every precaution to keep abreast of its needs. By the late 1870s, membership had grown to 276 regulars plus 201 on-call volunteers.[1] (continued)

B11. Additional Resource Attributes: (List attributes and codes)_____

***B12. References:**
See continuation sheet, pg. 6

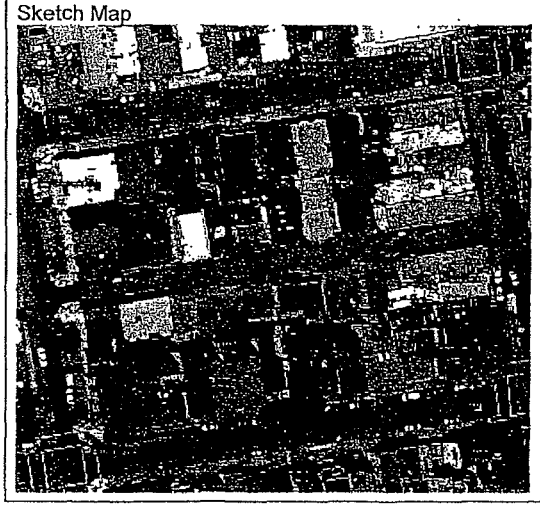
B13. Remarks:

***B14. Evaluator:** Christina Dikas, Page & Turnbull

***Date of Evaluation:** February 15, 2012

(This space reserved for official comments.)

Sketch Map



[1] "Historical Review, Part II: The Paid Department," *San Francisco Fire Department Museum*, web site accessed on 24 March 2011 from: http://www.guardiansofthecity.org/sffd/history/paid_department.html.

B10. Significance (continued)

Under the regime of Scannell's successor, Dennis Sullivan (1893-1906), the Fire Department grew to include 36 engine companies, eight truck companies, seven chemical companies, one water tower, and two monitor batteries by 1900. A modern fire alarm system had been installed throughout San Francisco. Water mains with more than 4,000 hydrants displaced the old fire cisterns. On the morning of 18 April 1906, a terrible earthquake shook San Francisco, and within a few hours, 52 fires had started. By the time the flames were extinguished three days later, 4.7 square miles of burned area remained, including the entire downtown. 28,000 buildings were destroyed—including 20 fire stations—and many of the Fire Department's vehicles and more than half of all hose were lost. Chief Sullivan died from injuries he sustained from the earthquake.[2]

Under Chief Patrick Shaughnessy (1906-1910) and authorized by a bond issue of $5,200,000, the city's Auxiliary Water Supply System was constructed. The system was comprised of the Twin Peaks Reservoir, two intermediate water tanks, 889 hydrants, two fireboats, and a system of underground reinforced concrete cisterns. The entire installation was completed in 1913, and formally accepted by the Fire Department in January 1914. The system remains in use today, providing an emergency supply in the event of any failure of the regular water distribution system.[3]

Prior to the construction of the current fire station at 2251 Greenwich Street, the site was occupied by three commercial buildings that faced Greenwich Street. The easternmost building was one story in height and contained an office. The center building was a two-story store with an attached dwelling at the rear. The westernmost commercial space was a one-story store. The back of the lot, facing Pixley, contained a two-story residential flats building.

The current fire station at 2251 Greenwich Street was constructed in 1938 for Engine 20, which relocated to its new quarters from 2666 Lombard Street. The station featured a steel frame and had one-story sections at the east side and at the rear (where the two-story flat-roofed section exists today). The original building permit and plans were not found at the Department of Building Inspection.

Renovations were performed in 1955-56 with funds from a 1952 bond act that provided $4.75 million for the construction and rehabilitation of fire stations throughout the city. The bond act was the San Francisco Fire Department's largest building program since the reconstruction after the 1906 Earthquake and Fire. The proposition was the result of two separate surveys by competent structural engineers, H.M. Engle of the Pacific Fire Rating Bureau and Harry Vensano, former Director of Public Works on San Francisco. San Francisco's fire station system had developed over the previous eighty or so years, and the locations and facilities were based upon outdated conditions. For example, 12 fire stations were over 50 years old in 1952, and 28 were built to accommodate horse-drawn equipment.[4] The bond act sought to update the older locations, build structures to provide better fire protection for the city, and provide improved living and working conditions for firefighters.[5] The Vensano Report (1951) noted that most of the fire stations were constructed by an architect, without the assistance of a structural engineer. As Fire Chief Edward P. Walsh said, "The result is that not only would an earthquake or atomic attack knock out most of our present firehouses, but the loss of personnel and equipment would be immeasurable at a time when people rely upon the Fire Department."[6]

The Firehouse Bonds proposition (Proposition H) was included in San Francisco's November 1952 election, and sought bonded indebtedness for the "acquisition, construction, completion, and reconstruction of firehouses within the City and County, together with their appurtenances."[7] The proposition broke down the bond amount into the following allocations: $285,000 for land purchase, $50,000 for engineering surveys, $3,950,000 for the construction of new fire stations, $365,000 for reconstruction, and $100,000 for contingencies.[8] Following passage of the bond act, Fire Chief Walsh stated that he hoped for a three-year program to complete construction and rebuilding of fire stations.[9] It appears that ultimately, at least 17 new stations were constructed and 11 others were reconditioned. Engine 20 was temporarily relocated to quarters at the Palace of Fine Arts while Station 16 was renovated.

[2] *Ibid.*
[3] *Ibid.*
[4] "City and County Propositions together with Arguments and Statements of Controller Relating to Costs to be voted on at General Presidential and Special Municipal Election to be held November 4, 1952: Proposition H: Firehouse Bonds, 1952," San Francisco Public Library, 23. Website accessed on 2 July 2009 from: http://sfpl4.sfpl.org/pdffiles/November4_1952.pdf.
[5] San Francisco Planning Department, 11.
[6] Paine Knickerbocker, "Proposition H: Chief Walsh Tells the City's Need for New Firehouses," San Francisco Chronicle (6 October 1952) 2.
[7] "City and County Propositions together with Arguments and Statements of Controller," 21.
[8] "City and County Propositions together with Arguments and Statements of Controller," 24.
[9] "Three-Year Firehouse Plan Urged," San Francisco Chronicle (3 December 1952) 4.

B10. Significance (continued)

Integrity
2251 Greenwich Street has been greatly altered, though it continues to be used as a San Francisco fire station. Alterations include altering the shape of the apparatus room door openings, remodeling the primary façade to a modern style, constructing second story additions at the east side and the south end of the building, and conducting interior alterations and upgrades. Therefore, it retains integrity of location, setting, and association. It does not retain integrity of design, materials, workmanship or feeling. Overall, the property does not retain integrity.

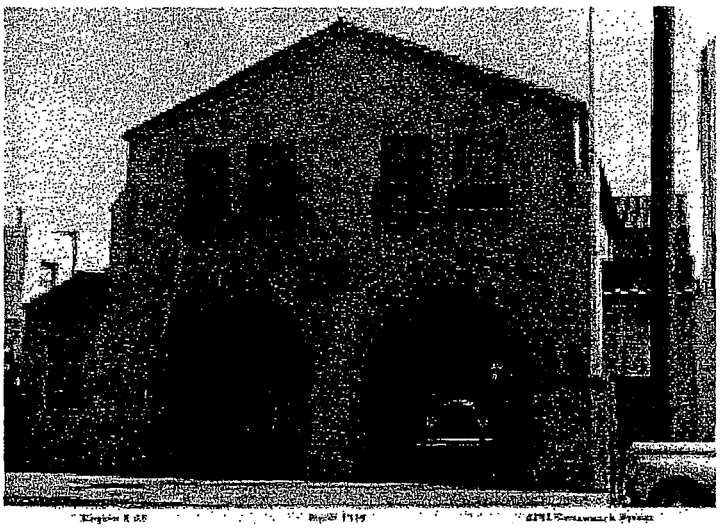
Historic Significance
2251 Greenwich Street does not appear to be associated with events that have made a significant contribution to the broad patterns of our history such that it would be eligible for local designation under National Register Criterion A (California Register Criterion 1). Its original construction is not associated with any major fire station construction program in San Francisco, nor did it play a pivotal role in the growth of the Cow Hollow neighborhood. Its 1950s renovations were funded by an important 1952 Bond Act, but it does not appear individually eligible for this association.

2251 Greenwich Street does not appear to be associated with any persons significant to the history of the State of California or the City of San Francisco such that it would be eligible under National Register Criterion B (California Register Criterion 2). None of the people directly associated with the building appear to be significant to local, state, or national history.

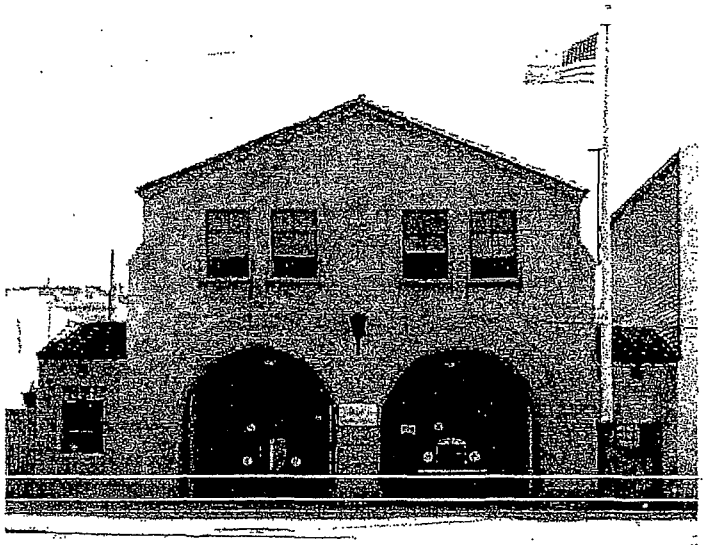
2251 Greenwich Street does not appear eligible under National Register Criterion C (California Register Criterion 3) because it does not feature high artistic value, and it does not embody the distinctive characteristics of a type, method, or period of construction. The original architect is unknown. Furthermore, the fire station has been greatly altered and does not retain integrity.

This property was not assessed for its potential to yield information important in prehistory or history, per National Register Criterion D (California Register Criterion 4).

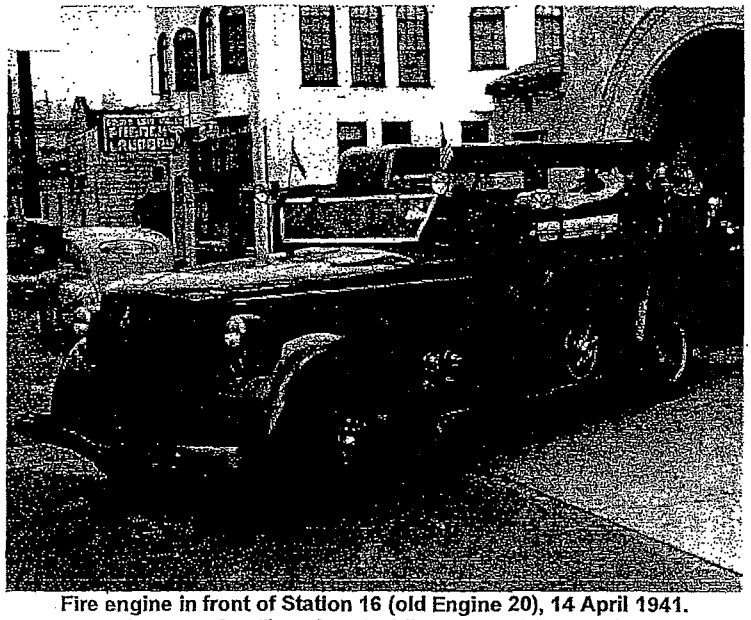
Based on the above assessment, 2251 Greenwich Street is designated with a CHRSC code of 6Z, which means it has been "Found ineligible for NR, CR or Local designation through survey evaluation."



2251 Greenwich Street, 1938.
(Source: San Francisco Fire Department Museum)



2251 Greenwich Street, ca. 1938 (photograph mislabeled as Station 40, 2155 18th Avenue).
(Source: San Francisco Historic Photograph Collection, AAD-8170)



Fire engine in front of Station 16 (old Engine 20), 14 April 1941.
(Source: San Francisco Public Library, AAE-1168)

2251 Greenwich Street, ca. 1956.
(Source: San Francisco Fire Department Museum)

B12. References (continued)

"Current Firehouse of San Francisco," Guardians of the City. Website accessed on 23 July 2009 from: http://guardiansofthecity.org.

Historical Review, Part II: The Paid Department," *San Francisco Fire Department Museum*, web site accessed on 24 March 2011 from: http://www.guardiansofthecity.org/sffd/history/paid_department.html.

Sanborn Fire Insurance Maps: 1913, 1950, 1998.

San Francisco Department of Building Inspection, permit records and plans.

San Francisco Firehouse Survey (ca. 1991).

EXHIBIT 3

MILLENNIUM
CONSULTING ASSOCIATES
A MECA Consulting, Inc. Company

"Providing Premiere Environmental & Industrial Hygiene Services Since 1986"

Corporate Offices:
620 Contra Costa Blvd., Ste. 102
Pleasant Hill, CA 94523
925.808.6700
www.mecaenviro.com

September 10, 2012 Project No. 3072.2083

Mr. Robert Begley
Site Assessment and Remediation Section
Project Controls and Services
Office of the Deputy Director for Design & Construction Department of Public Works
City and County of San Francisco
San Francisco, CA 94103

Submitted via e-mail: robert.c.begley@sfdpw.org

RE: San Francisco Fire Department Hazardous Materials Demolition Survey – Fire Station #16

Mr. Begley:

MILLENNIUM Consulting Associates (Millennium) is pleased to present the Hazardous Material Pre-Demolition Survey Report for Asbestos, Lead Paint and Other Regulated Materials for the referenced property. Findings of the Survey are presented in this report.

If you have comments or questions regarding this report, please do not hesitate to contact the undersigned at 925-808-6700. Millennium appreciates the opportunity to provide professional services to the City and County of San Francisco.

Sincerely,

Jeremy Malson, CIH, CAC, CLBP
Director IH, Northern CA

HAZARDOUS MATERIALS SURVEY REPORT

DPW Job No. 7439A
CSO No. MCI8
Consultant Project No. 3072.2083

Fire Station No. 16
2551 Greenwich Street
San Francisco, CA 94123

PREPARED FOR

City and County of San Francisco
Office of the Deputy Director for Design & Construction Department of Public Works
Project Controls and Services
Site Assessment and Remediation Section
1680 Mission Street, 1st Floor
San Francisco, CA 94103

PREPARED BY

Millennium Consulting Associates
620 Contra Costa Boulevard, Suite 102
Pleasant Hill, CA 94523

September 10, 2012

EXECUTIVE SUMMARY

Millennium Consulting Associates (MILLENNIUM) was requested by City and County of San Francisco, Office of the Deputy Director for Design & Construction Department of Public Works, Project Controls and Services, Site Assessment and Remediation Section to perform a demolition survey for 2551 Greenwich Street, San Francisco, CA. The purpose of the demolition survey was to determine and report the presence of hazardous materials such as Asbestos Containing Materials (ACM), Lead-Based Paint (LBP), Lead-Containing Paint (LCP) and other regulated materials that may be affected during the demolition project for the facility.

Millennium performed the surveys on July 31, 2012 and August 2, 2012. Wes Chase, CAC #: 12-4846, CDPH-I/A #: 21068 and Tyler Belair, CSST #: 11-4744, CDPH-P/M #: 22727 conducted walkthroughs to identify and collect information regarding all hazardous materials included in the scope of work. Millennium used the information to create a sampling strategy that would represent all suspect materials located in the subject facility areas. For the asbestos survey, the Millennium Team collected ninety-five (95) bulk samples throughout the subject areas of the facility, which were held and sent to a certified laboratory under chain of custody. For the lead survey, The Millennium Team used a certified X-ray Fluorescence Analyzer (XRF) to identify lead concentrations on painted surfaces throughout the subject areas of the facility.

Of the ninety-five (95) suspect asbestos bulk samples collected throughout the Fire Station 16 building, nine (9) samples contain types of asbestos fibers at concentrations ranging from less than 1 to 10%, as summarized below:

According to the analytical results, the following materials were identified as Asbestos Containing Material (ACM):

1. 16" Gray Transite pipe in the basement mechanical contained 3-5% Chrysotile asbestos and 5-10% Crocidolite asbestos;
2. 6" White pipe insulation with cotton canvas wrap in the basement mechanical contained 5-10% Chrysotile asbestos and 5-10% Amosite asbestos;
3. Gray exterior window putty on the 1st floor kitchen window and the 2nd level west side ranged in concentration from greater than 1-3% Chrysotile asbestos;

4. Tan exterior window putty on the 2nd level east side ranged in concentration from greater than 1-3% Chrysotile asbestos; and
5. Off-white exterior window putty on the roof patio at the stairs ranged in concentration from greater than 1-3% Chrysotile asbestos.

For additional details, refer to Result Summary Table 1 and Bulk Sample Location Maps included in this report. Note: No Asbestos Containing Construction Materials (ACCM), materials containing ≤ 1% asbestos, was found during our survey.

According to the results of the XRF Survey, the following is a list of components that contained concentrations that resulted in readings above the federal standard for lead based paint (greater than or equal to 1.0 mg/cm²):

XRF Readings

1. White, red, green and yellow paint on the plaster walls and ceilings in the Office, TV Room, Laundry Room, Restroom, Hall/Stairwell, Pantry (below the stairs), Dormitory, Men's Toilet Room and the Stairwell to the Roof contained lead in concentrations ranging from 5.3-18.4 mg/cm².

2. Black paint on the wood trim and baseboard in the TV Room contained lead in concentrations ranging from 4.2-12.0 mg/cm².

3. White, maroon, green and beige paint on the door and door components in the Shower/Boiler room, Hose Tower, Gym, Kitchen, Hall/Stairwell, Exterior, Men's Toilet and the Roof contained lead in concentrations ranging from 0.8-9.6 mg/cm².

4. Brown VSF stair tread (bottom layer) in the hall/stair well contained lead in concentrations of 5.0 mg/cm².

5. Red paint on the exterior concrete walls contained lead in concenttrations ranging from 1.0-2.4 mg/cm².

6. Gray paint on the exterior wood walls contained lead in concentrations of 9.5 mg/cm².

7. Gray paint on the exterior metal wall trim contained lead in concentrations of 1.7 mg/cm².

8. White paint on the exterior courtyard wood fence, gate and fence framing contained lead in concentrations ranging from 1.1-3.5 mg/cm².

9. White paint on the BBQ shed metal doors in the exterior courtyard contained lead in concentrations of 1.4 mg/cm².

10. Beige and black paint on the BBQ shed metal walls, ceiling, door frame and door casing in the exterior courtyard contained lead in concentrations ranging from 1.2-3.5 mg/cm².

11. Black paint on the structural metal I-beam contained lead in concentrations of 4.3 mg/cm².

12. Orange paint on the metal tank in the boiler/mechanical room contained lead in concentrations of 2.6 mg/cm².

13. Red paint on the metal components and the white paint on the wood components on the exterior flag pole contained lead in concentrations ranging from 11.8- 14.3 mg/cm².

14. Green ceramic wall tile, white porcelain sinks, white porcelain urinals and the white metal window casing in the Men's Toilet room contained lead in concentrations ranging from 4.4- 25.9 mg/cm².

15. White paint on the metal handrail in the stairwell leading to the roof contained lead in concentrations of 2.0 mg/cm².

16. Beige metal wall and the beige metal eave at the roof/patio entrance contained lead in concentrations ranging from 2.5- 2.8 mg/cm².

17. Gray metal roof jack contained lead in concentrations of 58.1 mg/cm^2.

Note: Please refer to Table 2 for the results of the XRF survey which lists the components that contained concentrations that resulted in readings at the federal standard for lead containing paint of less than 1.0 mg/cm^2.

According to the visual assessment, comments on other regulated materials were noted:

1. Approximately two hundred eighty-eight (288) fluorescent light tubes were noted on both floor levels. The light fixtures appeared to be mercury-containing lighting tubes;
2. Approximately one hundred fifty (150) light ballasts were noted on both floor levels;
3. Approximately eight (8) exit signs were noted on both floor levels;
4. No mercury-containing thermostats were noted at the time of the investigation;
5. No obvious signs of fungal growth was noted at the time of the investigation;
6. Some treated wood was noted in the floor/ceiling framing in the Hose Tower (lower level) and in the exterior courtyard area above the emergency diesel generator; and
7. The site appeared to have an underground storage tank located in and/or adjacent to the Apparatus Room. Also, an emergency diesel generator was noted in the rear exterior courtyard area.

Note: Only a representative number of light tubes, light ballasts and exit signs were visually assessed for universal wastes. Therefore, the contractor may need to field-verify and check all light tubes, ballasts and other universal wastes prior to the planned demolition activities.

Areas not tested or inaccessible at the time of the survey which may need further evaluation:

1. There were no inaccessible areas at the time of the survey.

Prior to demolition, all defined regulated materials must be handled and disposed (or recycled) by trained, licensed contractors.

This summary is not to be read as a standalone document. The report shall be read in its entirety. The reader must review the detailed information provided in the accompanying text. Any interpretation, use and conclusion resulting from the data contained in this report are the responsibility of the reader.

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ACRONYM GUIDE

ACM	Asbestos-Containing Material
ACCM	Asbestos-Containing Construction Material
Cal OSHA	California Occupational Safety and Health Administration
CCR	California Code of Regulations
CFR	Code of Federal Regulations
DPH	California Department of Public Health
EPA	Environmental Protection Agency
HSG	Homogeneous Sampling Group
HUD	U.S. Department of Housing and Urban Development
HVAC	Heating Ventilation and Air Conditioning
LBP	Lead-Based Paint
LCP	Lead-Containing Paint
NEA	Negative Exposure Assessment
NESHAP	National Emission Standards for Hazardous Air Pollutants
PLM	Polarized Light Microscopy
ppm	Parts per million
PQL	Practical Quantification Limit
RACM	Regulated Asbestos Containing Material
RFT	Resilient Floor Tile
CPSC	Consumer Product Safety Commission
TSI	Thermal System Insulation

1.0 INTRODUCTION

Millennium Consulting Associates (MILLENNIUM) was requested to perform a hazardous materials survey for Asbestos Containing Material (ACM), Lead-Based Paint (LBP) and other regulated materials at 2551 Greenwich Street, San Francisco, CA 94123 (SUBJECT PROPERTY or SITE). The purpose of the hazardous materials survey was to determine the presence of ACM, LBP and other regulated materials at the subject property prior to the scheduled demolition. Based on Millennium's understanding of the client's needs, the following scope of services was conducted:

1. Performed ACM survey of the subject property in accordance with the listed criteria in California Occupational Safety and Health Administration (Cal OSHA) standard 8 California Code of Regulations (CCR) 1529, OSHA standard 29 Code of Federal Regulations (CFR) 1926.1101 and Environmental Protection Agency (EPA) standard 40 CFR Part 61.145 (a), including the analysis of bulk samples via polarized light microscopy (PLM) methodology;

2. Performed lead survey to assess for painted surfaces that may require removal prior to or specific work practices during renovation activities. Paint chip samples are limited to collection from surfaces observed with deteriorated conditions only (i.e., peeling, blistering, flaking, etc.);

3. Other hazardous waste streams which were surveyed/investigated for include: mercury-containing light tubes and thermostats, PCB-containing light ballasts, treated wood wastes, tritium-containing exit signs and mold; and

4. Provided a written report detailing the hazardous materials information including description of the samples and sample locations, analytical results in tabular form, a site sketch depicting sample locations, quantity and condition of surfaces identified and interpretation of results.

2.0 BACKGROUND

2.1 Site Description

The subject property consists of Fire Station No. 16 at 2551 Greenwich Street, San Francisco, CA. The fire station is a two-story concrete and wood structure constructed on a concrete foundation. The building's foot-print at ground level is approximately 5,760 ft² and includes the Apparatus room (w/ a gym area), Office, TV room, Laundry room, Toilet, Shower/Boiler/Mechanical room, Storage Hose Tower, Communications room, Kitchen, Phone booth/Storage area and an Entry hall/Stairwell with a Pantry.

The second level of the building (approximately 4,512 ft²) is accessed by a west-stairway. The 2nd level hallway leads to the following functional rooms: Dormitory, Men's Toilet area, Men's Locker room, Women's Toilet/Locker room, Storage room, Officer's room (SW), Officer's room (SE) and the Officer's Toilet.

The building's exterior siding along Greenwich Street includes red lead-based paint on concrete and black painted ceramic tiles with two metal rollup doors. Deteriorated beige paint on stucco/plaster walls is present on the west and south exterior sidings of the building. Gray lead-based paint on wood siding is present on the east side of the property. A white lead-based paint fence located in the south court yard is present. Old metal window casings with window putty are found on the exterior of the site. Grayish/tan/off-white Asbestos-containing (AC) window putty (Chrysotile 1-3%) is found on the exterior of site.

Ground level (Apparatus floor)

The ground level of the building is constructed on a concrete slab-on-grade. The floor of the Apparatus room is covered with a layer of brown painted concrete. Carpeting is present in the Gym area of the Apparatus Room. Maroon vinyl sheet flooring is present in the Communications Room and Stairwell. The Kitchen is comprised of black vinyl sheet flooring. The remaining rooms, including the Boiler Room, Laundry Room and other surrounding storage rooms have exposed concrete flooring. The interior walls and ceilings on the ground level are a mix of concrete, plaster and drywall construction.

The Mechanical/Boiler Room contains pipes with Thermal System Insulation (TSI). A 16"-OD gray pipe contains cementitious asbestos material (5-15% Chrysotile and 5-10% Crocidolite). A 6"-OD pipe with white insulation and cotton canvas contains asbestos material (5-15% Chrysotile and 5-10% Amosite). No other obvious TSI pipe runs or elbows are found within the property.

Second level

The second floor (~5,400 ft²) consists of corridors (~5-6 ft wide) that lead to a Dormitory, Men's Toilet, Men's Locker room, Women's Locker Room/Toilet, two Officers' Rooms, an Officer's Toilet and a Storage Room.

The flooring material found throughout most of the second floor is maroon vinyl sheet covering and brown vinyl base coves (4" high). The Men's Locker room and the Women's Locker room/Toilet have gray concrete finished flooring. The Men's Toilet room is comprised of green ceramic tiles and gray concrete finished flooring. The interior walls and ceilings on the ground level are a mix of concrete, plaster and drywall construction. Interior walls of the showers and restrooms are comprised of 4" ceramic tile and painted plaster.

Roof

The Upper Roof (approximately 1,344 ft²) is accessed by a west-stairway. The Upper Roof is surrounded by approximately 2 - 3 ft high parapet stucco/concrete walls and metal flashing. A fence is present along the south parapet wall. The Upper Roof of the building is constructed of one layer of flat roofing felt with tar and small gravel. Roofing penetration with tar is found around most of the riser pipes and roofing vents. A Hose Tower (~45 ft high) is located on the southeast-end of the upper roof, as part of the original construction contains a yellow/beige surface coat with tan sealant (Chrysotile 5-10 %). To the north is a pitched roof with asphalt shingles (approximately 3,072 ft²). Along the southwest-side of the building is the Lower Roof (approximately 468 ft²), which serves as the roof of the ground level Kitchen.

2.2 Scope of Work

Millennium conducted the demolition hazardous materials assessment for 2551 Greenwich Street, San Francisco, CA 94123. The purpose of the demolition survey was to determine and report the presence of hazardous materials including ACM, LBP, LCP and other regulated materials that may be affected during the demolition project for the facility.

2.3 Records Review

Millennium was not provided previous data or hazardous materials surveys for the subject site.

3.0 WORK DESCRIPTION: SURVEYS AND FINDINGS

3.1 Asbestos Site Inspection/Assessment

A preliminary walk-through of the subject property buildings was performed to familiarize the inspector with the structures and to identify suspect ACM. The subject site is a fire station building. Most observed interior finishes were in good condition, although some were in poor or damaged condition (i.e., some of the interior and exterior walls and door and window components). The following interior finishes were included in the sampling plan:

- Drywall systems containing gypsum drywall and joint compound;
- Resilient Floor Systems (RFS) containing floor tiles, Vinyl Sheet Flooring (VSF) and associated mastics;
- Carpet adhesives;
- Pipe insulation;
- HVAC duct adhesives/tapes;
- Covebase and/or kickboards with associated mastics;
- Ceramic tiles and associates grouts;
- Vapor barriers;
- Transite pipes;
- Window putties and caulking;
- Stucco walls;
- Roofing systems and associated mastics and paints;
- Tar around skylights; and
- Plaster walls.

3.1.1 Asbestos Bulk Sampling Collection and Analysis

During the walk-through, the interior of the building and the main roof was assessed for suspect asbestos-containing surfacing materials, suspect asbestos-containing miscellaneous friable materials, suspect asbestos-containing Category I non-friable materials, and suspect asbestos-containing Category II non-friable materials. Friable materials are defined as materials that when dry, can be crumbled or reduced to a powder by hand pressure. Category I non-friable materials are defined as packing, gaskets, asphaltic roofing materials, and resilient flooring materials and associated mastics in which the asbestos fibers are bound within a resinous matrix. Category II non-friable materials are defined as other non-friable materials (e.g., transite) in which the asbestos fibers are bound within a cement-like matrix.

Sampling of suspect ACM was conducted on identified suspect materials regardless of their condition (i.e., friability) at the time of the survey. The assessment and sampling of suspect non-friable materials were included in the scope of work because their condition could change during renovation and/or demolition activities. Their change in condition could result in their reclassification from non-friable ACM to regulated ACM (RACM) that are subject to the EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) asbestos standard (40 CFR Part 61, Subpart M). During the walk-through, homogeneous sample groups were identified in the building. Based on the identified sampling groups, a bulk-sampling plan for suspect ACM was developed.

Bulk sampling was conducted in accordance with procedures outlined in the Asbestos Hazard Emergency Response Act (40 CFR 763.86, Sampling). The procedure requires the inspector to select random sampling locations from homogeneous materials suspected to contain asbestos. Ninety-five (95) suspect ACM bulk samples were collected and shipped under chain-of-custody procedures to Analytical Labs San Francisco (ALSF) located in San Francisco, California. ALSF is recognized under the National Laboratory Accreditation Program for satisfactory compliance with criteria established in Title 15, Part 7 code of Federal Regulations and accredited for bulk asbestos fiber analysis (NVLAP lab code: 101909-0). While the EPA Method of Asbestos in Bulk Insulation Samples is defined in 40 CFR 763, Appendix E to Subpart E (EPA Method 600/M4-82-020), the ACM bulk samples were analyzed for asbestos content using the EPA Method

600/R-93/116, 1993. This method is referred to as the "Improved Method" and is recommended by EPA as a preferred substitute to the Interim Method EPA 600/M4-82-020, 1982.

The EPA regulations define ACM as any material with an asbestos content greater than one percent (> 1%). EPA regulations regarding the proper handling of ACMs must be followed for materials containing greater than one percent asbestos. If based on the results of the initial sampling, NESHAP Point Count reanalysis is necessary for positive asbestos results of less than 10%. This quantification can be necessary to establish the most cost effective abatement practices required for some materials, particularly drywall systems. Lab analytical data for some materials collected resulted in amounts of Chrysotile asbestos greater than 1%. For this survey, these materials were not analyzed by the point counting method. Additional funding may be required to conduct any additional analyses.

3.1.2 Asbestos Regulatory Overview

Construction materials containing asbestos greater than 1 percent are defined as an Asbestos Containing Material (ACM) and are regulated under both federal and state regulations. Constructing materials containing asbestos greater than 0.1% are defined as an Asbestos Containing Construction Material (ACCM) and are regulated by the State of California. Cal/OSHA regulates the removal of both ACM and ACCM.

Please refer to Title 8§1529-*Asbestos* for the regulatory requirements associated with working with both ACM and ACCM. Additionally, refer to §1529(t)-*Report of Use and Asbestos-related Work Registration* for the registration requirement of contractors involved in asbestos-related work involving over 100 square feet of ACCM/ACM. In instances where a material contains asbestos in concentrations below the ACCM regulatory threshold, the employer is required to comply with Cal/OSHA 5194-*Hazard Communication* in addition to pertinent sections of §1529-*Asbestos*.

In California, ACMs that are friable or will become friable during abatement are classified as a California-Hazardous Waste, and require special handling, packaging and disposal.

3.1.3 ACM Survey Results

A complete breakdown of the materials sampled, location, positive results, the EPA NESHAP Categories and analytical results are provided in Table 1.

The ACM sample locations are illustrated in Table 1; the analytical laboratory report is provided in Appendix A.

3.2 Lead Paint Site Inspection/Assessment

Millenniums conducted the lead survey on July 31, 2012 and on August 2, 2012 to assess for paint that would require removal prior to demolition activities and to identify painted surfaces which may contain lead and, therefore, specific work practices during demolition activities. The sampling was not a comprehensive survey and, as such, was not intended to be compliant with U.S. Department of Housing and Urban Development (HUD) sampling requirements. Millennium performed the lead survey in general accordance with industry standards for demolition projects.

Wall A is the front wall or the wall that parallels the street that gives the site its address. Walls B, C and D go clockwise around the building or room from wall A. The C wall is the rear wall. Each room has a wall A, B, C and D and each closet has an A, B, C and D wall.

3.2.1 Lead Regulatory Overview

Worker Protection and Waste Definitions of Lead (in paint and construction materials)

Other Regulatory Definitions of lead-containing materials are detailed in 8 CCR and 22 CCR and CFR title 40 regulations. Cal/OSHA 1532.1-*Lead* regulates the removal of materials with detectable levels of lead. Please refer to §1532.1-*Lead* for the regulatory requirements associated with working with lead-containing materials.

It is important to understand that Cal/OSHA does not give a regulatory definition of a "lead-containing material." Cal/OSHA and Federal OSHA are concerned with "an employee occupationally exposed to lead." This is understood to mean material disturbed during construction

work containing lead in any amount (i.e., lead-containing paint and lead-based paint) is covered under the lead in construction standard. Additionally, Federal OSHA has determined that the uses of XRF data and/or bulk sampling data (e.g., paint chips) are not acceptable for predicting employee exposures to lead. This fact means that contractors cannot use XRF data, paint chip data or bulk sample data as a surrogate for employee exposures during construction work (or the bidding process) as defined in 8 CCR 1532.1(a). The two OSHA interpretation letters below should be reviewed. Again, in summary they state, the burden of proof is on the employer in regards to employee exposures to lead in construction work and not the reliance on XRF data, bulk sampling data or paint chip sampling data.

1. www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=23455
2. www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=22701

Current California and Federal regulations do mandate that generators determine if a waste is hazardous or non-hazardous by testing representative samples of the waste. The total lead by Total Threshold Limit Concentration (TTLC), California WET-method Soluble Threshold Limit Concentration (STLC), and Toxicity Characteristic Leaching Procedure (TCLP) analyses should be performed to characterize each waste stream as Federal RCRA hazardous waste, California hazardous waste, non-hazardous waste, or as construction debris. The waste stream must be handled as RCRA environmentally hazardous waste if TCLP lead levels exceed 5.0 milligrams per liter (mg/l), or as California hazardous waste if TTLC lead exceeds 1,000 milligrams per kilogram (mg/kg), and/or STLC lead exceeds 5.0 mg/l, respectively. By calculation, if a sample analyzed for lead by TTLC is found to contain less than 50 mg/kg, then the waste stream represented by the sample result is non-hazardous by definition (a completely soluble waste at this concentration would produce a TCLP lead concentration of less than 5.0 mg/l). Similarly, total lead less than 50 mg/kg will generally produce an STLC lead concentration of less than 5.0 mg/l.

3.2.2 Lead Survey Summary

A preliminary walk-through of the subject property was completed to visually identify deteriorated (i.e., not intact) painted surfaces. Most of the interior and exterior painted surfaces observed during the site reconnaissance were in good (in-tact) condition; however some finishes

were in fair or poor condition (i.e., some of the interior and exterior walls and door and window components).

A NITON (Model No. XLp 303A), a hand-held, battery operated energy dispersive x-ray fluorescence (XRF) analyzer was used for the survey. The XRF is utilized for the detection and quantification of elements ranging from phosphorus (atomic number 15) through uranium (atomic number 92). A positive classification indicates that lead is present on the painted surface at or above the California Department of Public Health (CDPH) standard of 1.0 mg/cm^2.

A total of four-hundred fifteen (415) XRF readings were collected at various locations of the site, not including calibrations and standardizations. The analytical results from XRF data of the lead samples indicate that seventy-seven (77) readings registered above 1.0 mg/cm^2. A complete breakdown of the surfaces sampled and location are provided in Table 2 of the Tables section of this document.

3.3 Other Regulated Materials

In addition to lead and asbestos, buildings can contain other regulated materials (ORM) that are considered hazardous. Typically, the ORMs include polychlorinated bi-phenyl (PCBs) containing light ballasts, mercury in lighting fixtures and thermostats, and self-illuminating signs.

Typically, the ballast labeling inside the fixtures reads either "PCB-containing", "No PCBs", or no label indication at all. Only those ballasts clearly indicating "No PCBs" can be disposed of as construction waste. Therefore, for purposes of this preliminary and non-intrusive survey, all ballasts will be assumed as not having PCB's, unless found otherwise prior to the demolition activities.

Fire Station No. 16 contains a combination of fluorescent lighting fixtures and incandescent lighting. For demolition/renovation purposes, each fluorescent light fixture (typically 4' x 2') is assumed to contain two ballasts and four light tubes.

According to the visual assessment, the following other regulated materials were noted:

1. Approximately two hundred eighty-eight (288) fluorescent light tubes were noted on both floor levels. The light fixtures appeared to be mercury-containing lighting tubes;
2. Approximately one hundred fifty (150) light ballasts were noted on both floor levels;
3. Approximately eight (8) exit signs were noted on both floor levels;
4. No mercury-containing thermostats were noted at the time of the investigation;
5. No obvious signs of fungal growth was noted at the time of the investigation;
6. Some treated wood was noted in the floor/ceiling framing in the Hose Tower (lower level) and in the exterior courtyard area above the emergency diesel generator; and
7. The site appeared to have an underground storage tank located in and/or adjacent to the Apparatus Room. Also, an emergency diesel generator was noted in the rear exterior courtyard area.

Note: Only a representative number of light tubes, light ballasts and exit signs were visually assessed for universal wastes. Therefore, the contractor may need to field-verify and check all light tubes, ballasts and other universal wastes prior to the planned demolition activities.

4.0 LIMITING CONDITIONS

Millennium conducted the Demolition Survey on July 31, 2012 and on August 2, 2012 in general accordance with industry standards for bulk asbestos and lead-based paint (LBP) sampling procedures in existence at the time of the project. The conclusions and recommendations presented in this report are based on the applicable standards of our profession at the time this report was prepared. Copies of this report are furnished to provide the factual data that were gathered and summarized in the report.

The analysis and recommendations submitted in this report are based in part on the data obtained from specific and discrete sampling locations. However, the nature and extent of variations between the sampling locations may not become evident until planned renovation and/or demolition procedures commence. If potential variations are identified during renovation or demolition activities, it may be necessary to conduct additional bulk sampling.

This report has been prepared for the exclusive use of DPW for specific application to the ACM and LBP building surveys performed on the property, specifically, the facility located at 2551 Greenwich Street, San Francisco, CA. This report may not be copied (except by our client) without the written permission of Millennium Consulting Associates, Pleasant Hill, California. No other representation, expressed or implied, is made.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The building located at 2551 Greenwich Street, San Francisco, California, as identified in the attached figures, has been surveyed for ACM and LBP and categorized based on the listed criteria.

Asbestos Containing Material Survey

PLM analysis identified ACM applications in the following materials:

1. 16" Gray Transite pipe in the basement mechanical contained 3-5% Chrysotile asbestos and 5-10% Crocidolite asbestos;

2. 6" White pipe insulation with cotton canvas wrap in the basement mechanical contained 5-10% Chrysotile asbestos and 5-10% Amosite asbestos;

3. Gray exterior window putty on the 1st floor kitchen window and the 2nd level west side ranged in concentration from greater than 1-3% Chrysotile asbestos;

4. Tan exterior window putty on the 2nd level east side ranged in concentration from greater than 1-3% Chrysotile asbestos; and

5. Off-white exterior window putty on the roof patio at the stairs ranged in concentration from greater than 1-3% Chrysotile asbestos.

Asbestos was not detected in the remaining bulk samples collected during this survey.

Millennium recommends the removal of identified ACM by a licensed removal contractor in accordance with applicable state and local regulations prior to planned demolition/renovation activities.

Lead Paint Material Survey

The analytical results from XRF data of the lead samples indicate the presence of lead-based paint in the following materials:

1. White, red, green and yellow paint on the plaster walls and ceilings in the Office, TV Room, Laundry room, restroom, Hall/Stairwell, Pantry (below the stairs), Dormitory, Men's Toilet room and the Stairwell to the Roof contained lead in concentrations ranging from 5.3-18.4 mg/cm².

2. Black paint on the wood trim and baseboard in the TV Room contained lead in concentrations ranging from 4.2-12.0 mg/cm².

3. White, maroon, green and beige paint on the door and door components in the Shower/Boiler room, Hose Tower, Gym, Kitchen, Hall/Stairwell, Exterior, Men's Toilet and the Roof contained lead in concentrations ranging from 0.8-9.6 mg/cm².

4. Brown VSF stair tread (bottom layer) in the hall/stair well contained lead in concentrations of 5.0 mg/cm².

5. Red paint on the exterior concrete walls contained lead in concentrations ranging from 1.0-2.4 mg/cm².

6. Gray paint on the exterior wood walls contained lead in concentrations of 9.5 mg/cm².

7. Gray paint on the exterior metal wall trim contained lead in concentrations of 1.7 mg/cm².

8. White paint on the exterior courtyard wood fence, gate and fence framing contained lead in concentrations ranging from 1.1-3.5 mg/cm².

9. White paint on the BBQ shed metal doors in the exterior courtyard contained lead in concentrations of 1.4 mg/cm².

10. Beige and black paint on the BBQ shed metal walls, ceiling, door frame and door casing in the exterior courtyard contained lead in concentrations ranging from 1.2-3.5 mg/cm^2.

11. Black paint on the structural metal I-beam contained lead in concentrations of 4.3 mg/cm^2.

12. Orange paint on the metal tank in the boiler/mechanical room contained lead in concentrations of 2.6 mg/cm^2.

13. Red paint on the metal components and the white paint on the wood components on the exterior flag pole contained lead in concentrations ranging from 11.8- 14.3 mg/cm^2.

14. Green ceramic wall tile, white porcelain sinks, white porcelain urinals and the white metal window casing in the Men's Toilet room contained lead in concentrations ranging from 4.4- 25.9 mg/cm^2.

15. White paint on the metal handrail in the stairwell leading to the roof contained lead in concentrations of 2.0 mg/cm^2.

16. Beige metal wall and the beige metal eave at the roof/patio entrance contained lead in concentrations ranging from 2.5- 2.8 mg/cm^2.

17. Gray metal roof jack contained lead in concentrations of 58.1 mg/cm^2.

Millennium recommends the removal of identified lead paint by a licensed removal contractor in accordance with applicable state and local regulations prior to planned demolition/renovation activities.

Other Regulated Materials Survey

The ORM survey indicates the presence of fluorescent tubes and treated wood. However, no obvious signs of PCB-containing light ballasts, mercury-containing switches, exit signs with

radioactive sources or obvious signs of fungal growth were present at the time of the investigation. If these materials are discovered during the course of abatement, Millennium recommends these materials be handled and disposed of properly.

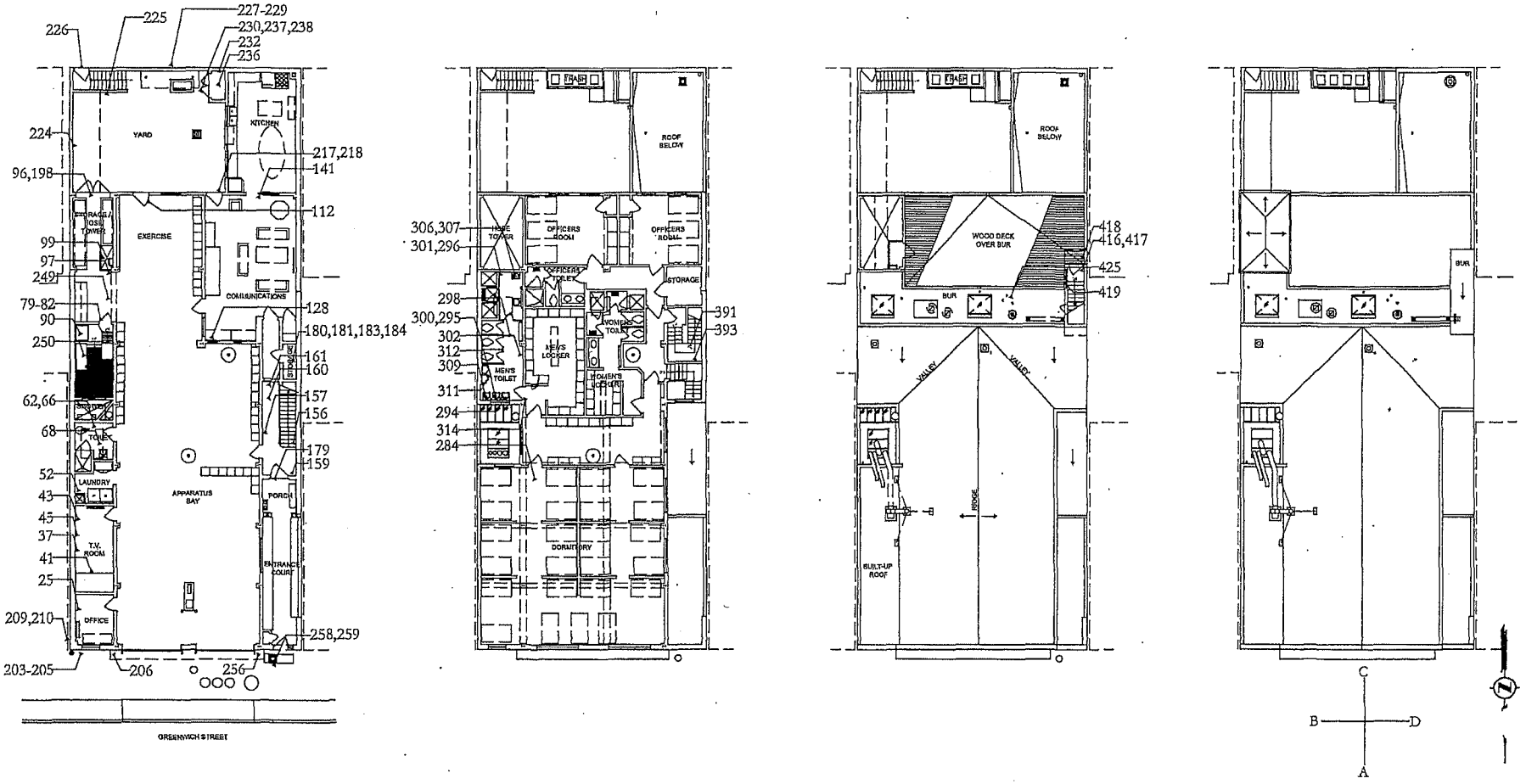
IMPORTANT: Not all lighting ballasts, lighting tubes, thermostats, and exit signs were inspected. Therefore, it will be necessary to inspect all fixtures and equipment for ORM prior to disposal or recycling.

If you have any questions, please contact me at your convenience. Thank you.

Wes Chase, LEED-AP, REA, CIE, CAC, CDPH-I/A
Certified Asbestos Consultant #: 12-4846
CDPH-I/A #: 21068
Associate Industrial Hygienist

Jeremy Malson, CIH
Certified Industrial Hygienist
ABIH Certification #: 9823, Exp. 6/1/2016
Director of Nor Cal IH Services

FIGURES



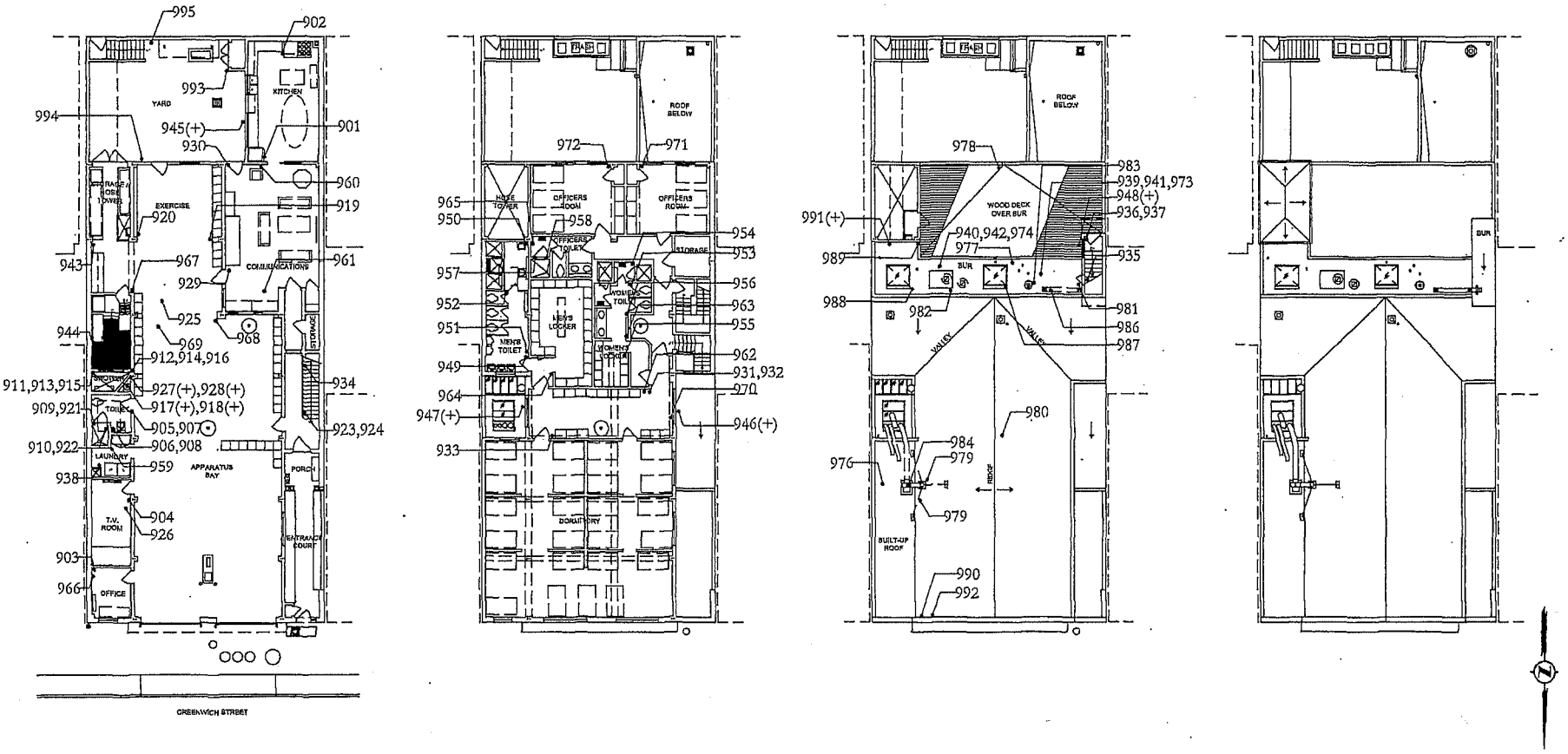
LEGEND:

9XX - LEAD BASED PAINT SAMPLE LOCATION

CITY AND COUNT OF SAN FRANCISCO		
MILLENNIUM CONSULTING ASSOCIATES PLEASANT HILL, CA		
SCALE: 1" = 20'	FOR: FIRE STATION NO. 16 2251 GREENWICH ST SAN FRANCISCO	
DATE: 8/14/12		
DRWN: JR3	TITLE: LEAD BASED PAINT SAMPLE LOCATION PLAN	
CHECKED:		
APPROVED:	JOB NO. 3072.2083	DWG. NO. FIGURE-2

BACKGROUND REFERENCE: DEPARTMENT OF PUBLIC WORKS CITY AND COUNT OF SAN FRANCISCO

1038



LEGEND:

9XX - ASBESTOS SAMPLE LOCATION

9XX(+) - POSITIVE FOR ASBESTOS

CITY AND COUNT OF SAN FRANCISCO	
MILLENNIUM CONSULTING ASSOCIATES PLEASANT HILL, CA	
SCALE: 1" = 20'	FOR: FIRE STATION NO. 16
DATE: 8/14/12	2251 GREENWICH ST SAN FRANCISCO
DRWN: JR3	TITLE: ASBESTOS BULK SAMPLE LOCATION PLAN
CHECKED:	
APPROVED:	JOB NO. 3072.2083 — DWG. NO. FIGURE-1

BACKGROUND REFERENCE: DEPARTMENT OF PUBLIC WORKS CITY AND COUNT OF SAN FRANCISCO

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TABLES

TABLE 1 Building Material Samples-ACM Fire Station No. 16						
Sample No.	Sample Location	Material Type	Approx. Qty. (ft^2)	Asbestos Content/Type	EPA Category[1]	Material Condition
07/31/2012 & 08/02/2012						
120802.901	1st Floor Kitchen	Black Sheet Flooring	N/A	NAD	N/A	N/A
120802.902	1st Floor Kitchen	Black Sheet Flooring	N/A	NAD	N/A	N/A
120802.903	1st Floor Office	Cove Base Mastic Associated with 6" Tan CB	N/A	NAD	N/A	N/A
120802.904	1st Floor TV Room	Cove Base Mastic Associated with 6" Tan CB	N/A	NAD	N/A	N/A
120802.905	1st Floor RR #1	2" x 2" Ceramic FT Mortar	N/A	NAD	N/A	N/A
120802.906	1st Floor RR #1	2" x 2" Ceramic FT Mortar	N/A	NAD	N/A	N/A
120802.907	1st Floor RR #1	2" x 2" Ceramic FT Mortar	N/A	NAD	N/A	N/A
120802.908	1st Floor RR #1	2" x 2" Ceramic FT Mortar	N/A	NAD	N/A	N/A
120802.909	1st Floor RR #1	4" x 4" Ceramic FT Mortar	N/A	NAD	N/A	N/A
120802.910	1st Floor RR #1	4" x 4" Ceramic FT Mortar	N/A	NAD	N/A	N/A

TABLE 1 Building Material Samples-ACM Fire Station No. 16						
Sample No.	Sample Location	Material Type	Approx. Qty. (ft^2)	Asbestos Content/Type	EPA Category[1]	Material Condition
120802.911	Sauna/Shower	Tile Grout	N/A	NAD	N/A	N/A
120802.912	Sauna/Shower	Tile Grout	N/A	NAD	N/A	N/A
120802.913	Sauna/Shower	Tile Mortar	N/A	NAD	N/A	N/A
120802.914	Sauna/Shower	Tile Mortar	N/A	NAD	N/A	N/A
120802.915	Sauna/Shower	Vapor Barrier	N/A	NAD	N/A	N/A
120802.916	Sauna/Shower	Vapor Barrier	N/A	NAD	N/A	N/A
120802.917	**Basement Mechanical Room**	**16" Transite Pipe**	**35 LF**	**5-15% Chrysotile 5-10% Crocidolite**	**Cat II NF**	**Good**
120802.918	**Basement Mechanical Room**	**16" Transite Pipe**	**Included in Sample 120802.917**	**5-15% Chrysotile 5-10% Crocidolite**	**Cat II NF**	**Good**
120802.919	1st Floor Gym Area	Carpet Mastic (Yellow)	N/A	NAD	N/A	N/A

TABLE 1 Building Material Samples-ACM Fire Station No. 16						
Sample No.	Sample Location	Material Type	Approx. Qty. (ft^2)	Asbestos Content/Type	EPA Category[1]	Material Condition
120802.920	1st Floor Gym Area	Carpet Mastic (Yellow)	N/A	NAD	N/A	N/A
120802.921	1st Floor RR #1	4" x 4" Ceramic WT Mortar	N/A	NAD	N/A	N/A
120802.922	1st Floor RR #1	4" x 4" Ceramic WT Mortar	N/A	NAD	N/A	N/A
120802.923	1st Floor Stairs	Red Sheet Flooring with Backing and Yellow Mastic (Top) Brown Sheet Flooring with Backing and Black Mastic (Bottom)	N/A	NAD	N/A	N/A
120802.924	1st Floor Stairs	Red Sheet Flooring with Backing and Yellow Mastic (Top) Brown Sheet Flooring with Backing and Black Mastic (Bottom)	N/A	NAD	N/A	N/A
120802.925	1st Floor Garage	New TSI on Ceiling Pipes and Changers	N/A	NAD	N/A	N/A
120802.926	1st Floor TV Room	New TSI on Ceiling Pipes and Changers	N/A	NAD	N/A	N/A
120802.927	**Basement Mechanical Room**	**TSI (6" Pipe)**	**25 LF**	**5-10% Chrysotile 5-10% Amosite**	**Friable**	**Good**

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Sample No.	Sample Location	Material Type	Approx. Qty. (ft^2)	Asbestos Content/Type	EPA Category[1]	Material Condition
120802.928	**Basement Mechanical Room**	**TSI (6" Pipe)**	**Included in Sample 120802.927**	**5-10% Chrysotile 5-10% Amosite**	**Friable**	**Good**
120802.929	1st Floor Break Room	Black/Red Sheet Flooring with Backing and Yellow Mastic	N/A	NAD	N/A	N/A
120802.930	1st Floor Break Room	Black/Red Sheet Flooring with Backing and Yellow Mastic	N/A	NAD	N/A	N/A
120802.931	2nd Floor Hall	Black/Red Sheet Flooring with Backing and Yellow Mastic	N/A	NAD	N/A	N/A
120802.932	2nd Floor Hall	Cove Base Mastic (Yellow) Associated with 4" Brown CB	N/A	NAD	N/A	N/A
120802.933	2nd Floor Hall	Cove Base Mastic (Yellow) Associated with 4" Brown CB	N/A	NAD	N/A	N/A
120802.934	2nd Floor Stairs to Roof	Brown Battleship with Black Backing	N/A	NAD	N/A	N/A
120802.935	2nd Floor Stairs to Roof	Brown Battleship with Black Backing	N/A	NAD	N/A	N/A
120802.936	Stair Landing at Roof	Black Sheet Flooring with Backing	N/A	NAD	N/A	N/A

TABLE 1 Building Material Samples-ACM Fire Station No. 16						
Sample No.	Sample Location	Material Type	Approx. Qty. (ft^2)	Asbestos Content/Type	EPA Category[1]	Material Condition
120802.937	Stair Landing at Roof	Black Sheet Flooring with Backing	N/A	NAD	N/A	N/A
120802.938	1st Floor Laundry Room Plenum	Tan HVAC Mastic or Duct	N/A	NAD	N/A	N/A
120802.939	Attic	Tan HVAC Mastic and Tape on Duct	N/A	NAD	N/A	N/A
120802.940	Attic	Tan HVAC Mastic and Tape on Duct	N/A	NAD	N/A	N/A
120802.941	Attic	Gray HVAC Mastic and Tape	N/A	NAD	N/A	N/A
120802.942	Attic	Gray HVAC Mastic and Tape	N/A	NAD	N/A	N/A
120802.943	Southeast	Black Wall Vapor Barrier	N/A	NAD	N/A	N/A
120802.944	East	Black Wall Vapor Barrier	N/A	NAD	N/A	N/A
120802.945	**1st Floor Kitchen Window**	**Exterior Window Glazing**	**80**	**1-3% Chrysotile**	**Cat II NF**	**Good**
120802.946	**2nd Floor West**	**Exterior Window Glazing**	**Included in Sample 120802.945**	**1-3% Chrysotile**	**Cat II NF**	**Good**
120802.947	**2nd Floor East**	**Exterior Window Glazing**	**Included in Sample**	**1-3% Chrysotile**	**Cat II NF**	**Good**

TABLE 1 Building Material Samples-ACM Fire Station No. 16						
Sample No.	Sample Location	Material Type	Approx. Qty. (ft^2)	Asbestos Content/Type	EPA Category[1]	Material Condition
			120802.945			
120802.948	**Roof Patio at Stairs**	**Exterior Window Glazing**	**Included in Sample 120802.945**	**1-3% Chrysotile**	**Cat II NF**	**Good**
120802.949	2nd Floor Men's RR	Ceramic Wall Tile Grout and Mortar	N/A	NAD	N/A	N/A
120802.950	2nd Floor Men's RR	Ceramic Wall Tile Grout and Mortar	N/A	NAD	N/A	N/A
120802.951	2nd Floor Men's RR	Mosaic FT Mortar and Grout	N/A	NAD	N/A	N/A
120802.952	2nd Floor Men's RR	Mosaic FT Mortar and Grout	N/A	NAD	N/A	N/A
120802.953	2nd Floor Women's RR	4" x 4" Ceramic Wall Tile Grout and Mortar	N/A	NAD	N/A	N/A
120802.954	2nd Floor Women's RR	4" x 4" Ceramic Wall Tile Grout and Mortar	N/A	NAD	N/A	N/A
120802.955	2nd Floor Women's RR	Blue Epoxy Floor	N/A	NAD	N/A	N/A
120802.956	2nd Floor Women's RR	Blue Epoxy Floor	N/A	NAD	N/A	N/A
120802.957	2nd Floor Officer's RR	Shower Tile, Grout and Mortar	N/A	NAD	N/A	N/A

TABLE 1 Building Material Samples-ACM Fire Station No. 16						
Sample No.	Sample Location	Material Type	Approx. Qty. (ft^2)	Asbestos Content/Type	EPA Category[1]	Material Condition
120802.958	2nd Floor Officer's RR	Shower Tile, Grout and Mortar	N/A	NAD	N/A	N/A
120802.959	1st Floor Laundry Room	DWS	N/A	NAD	N/A	N/A
120802.960	1st Floor Break Room	DWS	N/A	NAD	N/A	N/A
120802.961	1st Floor Break Room (Ceiling)	DWS	N/A	NAD	N/A	N/A
120802.962	2nd Floor Hall	DWS	N/A	NAD	N/A	N/A
120802.963	2nd Floor Women's RR	DWS	N/A	NAD	N/A	N/A
120802.964	2nd Floor Men's Locker Room	DWS	N/A	NAD	N/A	N/A
120802.965	2nd Floor Office's RR	DWS	N/A	NAD	N/A	N/A
120802.966	1st Floor Office #1	Plaster Wall System	N/A	NAD	N/A	N/A
120802.967	1st Floor Behind Ice Machine	Plaster Wall System	N/A	NAD	N/A	N/A
120802.968	1st Floor Garage on Column	Plaster Wall System	N/A	NAD	N/A	N/A

TABLE 1 Building Material Samples-ACM Fire Station No. 16						
Sample No.	Sample Location	Material Type	Approx. Qty. (ft^2)	Asbestos Content/Type	EPA Category[1]	Material Condition
120802.969	1st Floor Garage Ceiling	Plaster Wall System	N/A	NAD	N/A	N/A
120802.970	2nd Floor Hall	Plaster Wall System	N/A	NAD	N/A	N/A
120802.971	2nd Floor Officer's Rm #1	Plaster Wall System	N/A	NAD	N/A	N/A
120802.972	2nd Floor Officer's Rm #2	Plaster Wall System	N/A	NAD	N/A	N/A
120802.973	Taken in Attic	Ceiling Plaster	N/A	NAD	N/A	N/A
120802.974	Attic	Ceiling Plaster Above 2nd Floor DW Ceiling	N/A	NAD	N/A	N/A
120802.975	Above Stairs	Flat Rolled Tar and Gravel Roof	N/A	NAD	N/A	N/A
120802.976	Northeast Roof	Flat Rolled Tar and Gravel Roof	N/A	NAD	N/A	N/A
120802.977	North of Roof Patio	Flat Rolled Tar and Gravel Roof	N/A	NAD	N/A	N/A
120802.978	Roof Patio	Flat Rolled Tar and Gravel Roof	N/A	NAD	N/A	N/A
120802.979	East at Roof Transition	Composition Roof	N/A	NAD	N/A	N/A

TABLE 1 Building Material Samples-ACM Fire Station No. 16						
Sample No.	Sample Location	Material Type	Approx. Qty. (ft^2)	Asbestos Content/Type	EPA Category[1]	Material Condition
120802.980	West at Peak	Composition Roof	N/A	NAD	N/A	N/A
120802.981	Roof	Black Penetration Mastic	N/A	NAD	N/A	N/A
120802.982	Roof	Black Penetration Mastic	N/A	NAD	N/A	N/A
120802.983	North of Patio	Gray/Black Penetration Mastic on Roof	N/A	NAD	N/A	N/A
120802.984	At Composition Roof	Gray/Black Penetration Mastic on Roof	N/A	NAD	N/A	N/A
120802.985	East Flat Roof	HVAC Tape	N/A	NAD	N/A	N/A
120802.986	North of Patio on Flat Roof	HVAC Tape	N/A	NAD	N/A	N/A
120802.987	West Skylight	White Skylight Mastic	N/A	NAD	N/A	N/A
120802.988	East Skylight	White Skylight Mastic	N/A	NAD	N/A	N/A
120802.989	Patio Roof	Tan Flashing Mastic	N/A	NAD	N/A	N/A
120802.990	North/Front of Composition Roof	Tan Flashing Mastic	N/A	NAD	N/A	N/A

TABLE 1 Building Material Samples-ACM Fire Station No. 16						
Sample No.	Sample Location	Material Type	Approx. Qty. (ft^2)	Asbestos Content/Type	EPA Category[1]	Material Condition
120802.991	**North Hose Tower**	**Exterior Stucco/Concrete Skim Coat**	**1250**	**5-10% Chrysotile**	**Cat II NF**	**Good**
120802.992	North Exterior Wall	Exterior Stucco/Concrete Skim Coat	N/A	NAD	N/A	N/A
120802.993	Exterior BBQ Shed	Paint(Cream)	N/A	NAD	N/A	N/A
120802.994	Exterior South	Paint	N/A	NAD	N/A	N/A
120802.995	Exterior South Yard	Retaining Wall Paint	N/A	NAD	N/A	N/A

*Samples were not point counted as part of the initial survey. Additional funding may be required to conduct the additional analyses.

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.

Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
5	Fire Station #16	Apparatus Bay	Wall	Plaster	Green	< LOD	0.03
6	Fire Station #16	Apparatus Bay	Wall	Concrete	Green	< LOD	0.05
7	Fire Station #16	Apparatus Bay	Wall	Plaster	Green	< LOD	0.07
8	Fire Station #16	Apparatus Bay	Wall	Plaster	Green	< LOD	0.1
9	Fire Station #16	Apparatus Bay	Wall	Plaster	White	< LOD	0.03
10	Fire Station #16	Apparatus Bay	Wall	Plaster	White	< LOD	0.69
11	Fire Station #16	Apparatus Bay	Wall	Plaster	White	< LOD	0.1
12	Fire Station #16	Apparatus Bay	Wall	Plaster	White	< LOD	0.05
13	Fire Station #16	Apparatus Bay	Ceiling	Plaster	White	< LOD	0.03
14	Fire Station #16	Apparatus Bay	Floor	Concrete	Brown	< LOD	0.03
15	Fire Station #16	Apparatus Bay	Door	Wood	White	< LOD	0.03

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
16	Fire Station #16	Apparatus Bay	Door frame	Wood	White	< LOD	0.03
17	Fire Station #16	Apparatus Bay	Door jamb	Metal	White	< LOD	0.03
18	Fire Station #16	Apparatus Bay	Door stop	Metal	White	< LOD	0.03
19	Fire Station #16	Apparatus Bay	Window sill	Wood	Green	0.09	0.05
20	Fire Station #16	Apparatus Bay	Window apron	Wood	Green	0.08	0.05
21	Fire Station #16	Office	Wall	Plaster	White	< LOD	0.75
22	Fire Station #16	Office	Wall	Plaster	White	< LOD	0.03
23	Fire Station #16	Office	Wall	Plaster	White	< LOD	0.03
24	Fire Station #16	Office	Wall	Concrete	White	< LOD	0.66
25	Fire Station #16	Office	Wall	Plaster	White	5.3	1
26	Fire Station #16	Office	Ceiling	Plaster	White	< LOD	0.77
27	Fire Station #16	Office	Door	Wood	White	< LOD	0.03
28	Fire Station #16	Office	Door frame	Wood	White	0.18	0.08
29	Fire Station #16	Office	Door jamb	Wood	White	0.7	0.1

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
30	Fire Station #16	Office	Door stop	Wood	White	0.18	0.11
31	Fire Station #16	Office	Baseboard	Wood	White	0.26	0.14
32	Fire Station #16	Office	Window sill	Wood	White	0.13	0.08
33	Fire Station #16	Office	Window apron	Wood	White	0.23	0.15
34	Fire Station #16	Office	Window casing	Metal	White	< LOD	0.03
35	Fire Station #16	Office	Wall heater case	Metal	White	0.07	0.05
36	Fire Station #16	TV Room	Wall	Plaster	Maroon	< LOD	0.05
37	Fire Station #16	TV Room	Wall	Plaster	Maroon	6.5	1.3
38	Fire Station #16	TV Room	Wall	Plaster	Maroon	< LOD	0.03
39	Fire Station #16	TV Room	Wall	Concrete	Maroon	< LOD	0.09
40	Fire Station #16	TV Room	Ceiling	Plaster	Maroon	< LOD	23.1
41	Fire Station #16	TV Room	Wall	Plaster	Maroon	6.4	1.2
42	Fire Station #16	TV Room	Ceiling	Plaster	Maroon	< LOD	0.08
43	Fire Station #16	TV Room	Trim	Wood	Black	12	1.4
44	Fire Station #16	TV Room	Floor	Concrete	Gray	< LOD	0.05

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm²)	Pb Error (+/-)
45	Fire Station #16	TV Room	Baseboard	Wood	Black	.42	0.6
46	Fire Station #16	TV Room	Door	Wood	Black	< LOD	0.03
47	Fire Station #16	TV Room	Door frame	Wood	Black	< LOD	0.03
48	Fire Station #16	TV Room	Door jamb	Metal	Black	< LOD	0.03
49	Fire Station #16	TV Room	Door stop	Metal	White	< LOD	0.03
50	Fire Station #16	Laundry Room	Wall	Plaster	Green	< LOD	0.03
51	Fire Station #16	Laundry Room	Wall	Drywall	Green	< LOD	0.03
52	Fire Station #16	Laundry Room	Wall	Plaster	Green	5.4	1.3
53	Fire Station #16	Laundry Room	Wall	Drywall	Green	< LOD	0.03
54	Fire Station #16	Laundry Room	Wall	Drywall	Green	< LOD	0.03
55	Fire Station #16	Laundry Room	Wall	Drywall	Green	< LOD	0.03
56	Fire Station #16	Laundry Room	Ceiling	Plaster	White	< LOD	0.72
57	Fire Station #16	Laundry Room	Door frame	Wood	White	< LOD	0.03
58	Fire Station #16	Laundry Room	Door jamb	Metal	White	< LOD	0.03
59	Fire Station #16	Laundry Room	Door stop	Metal	White	< LOD	0.03

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
60	Fire Station #16	Restroom	Wall	Plaster	Yellow	< LOD	0.03
61	Fire Station #16	Restroom	Wall	Plaster	Yellow	< LOD	0.03
62	Fire Station #16	Restroom	Wall	Plaster	Yellow	8.8	1.3
63	Fire Station #16	Restroom	Wall	Plaster	Yellow	< LOD	0.7
64	Fire Station #16	Restroom	Wall	Plaster	White (Upper)	< LOD	0.03
65	Fire Station #16	Restroom	Wall	Plaster	White (Upper)	< LOD	0.03
66	Fire Station #16	Restroom	Wall	Plaster	White (Upper)	3.7	1
67	Fire Station #16	Restroom	Wall	Plaster	White (Upper)	< LOD	0.73
68	Fire Station #16	Restroom	Ceiling	Plaster	White	9.8	1.6
69	Fire Station #16	Restroom	Door	Wood	Tan	< LOD	0.03
70	Fire Station #16	Restroom	Door frame	Wood	White	< LOD	0.03
71	Fire Station #16	Restroom	Door jamb	Metal	White	< LOD	0.03
72	Fire Station #16	Restroom	Door stop	Metal	White	< LOD	0.03
73	Fire Station #16	Restroom	Floor	Ceramic	Beige	< LOD	0.08
74	Fire Station #16	Restroom	Baseboard	Ceramic	Beige	< LOD	0.07

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Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
75	Fire Station #16	Restroom	Baseboard	Ceramic	Beige	< LOD	0.19
76	Fire Station #16	Restroom	Shower wall	Ceramic	Beige	< LOD	0.12
77	Fire Station #16	Restroom	Toilet	Porcelain	White	< LOD	0.03
78	Fire Station #16	Restroom	Sink	Porcelain	White	< LOD	0.03
79	Fire Station #16	Shower/Boiler Room	Door	Metal	Green	14.6	1.6
80	Fire Station #16	Shower/Boiler Room	Doorframe	Metal	Green	5.1	2
81	Fire Station #16	Shower/Boiler Room	Doorjamb	Metal	Green	4.5	0.8
82	Fire Station #16	Shower/Boiler Room	Doorstop	Metal	Green	4.8	1
83	Fire Station #16	Shower/Boiler Room	TSI	Metal	Silver	0.11	0.06
84	Fire Station #16	Shower/Boiler Room	Floor	Metal	Gray	< LOD	0.03
85	Fire Station #16	Shower/Boiler Room	Stringer	Metal	Gray	< LOD	0.03
86	Fire Station #16	Shower/Boiler Room	Tread	Metal	Gray	< LOD	0.03
87	Fire Station #16	Shower/Boiler Room	Tread	Metal	Gray	< LOD	0.03
88	Fire Station #16	Shower/Boiler Room	Riser	Metal	Gray	< LOD	0.03
89	Fire Station #16	Shower/Boiler Room	Handrail	Metal	Gray	< LOD	0.03

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Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
90	Fire Station #16	Shower/Boiler Room	Pipe run	Metal	Green	8.7	1.6
91	Fire Station #16	Shower/Boiler Room	Shower wall	Ceramic	White	< LOD	0.03
92	Fire Station #16	Shower/Boiler Room	Shower wall	Ceramic	Gray	< LOD	0.17
93	Fire Station #16	Shower/Boiler Room	Shower wall	Ceramic	Blue	< LOD	0.03
94	Fire Station #16	Shower/Boiler Room	Shower floor	Ceramic	White	< LOD	0.03
95	Fire Station #16	Shower/Boiler Room	Floor	Wood	Green	< LOD	0.03
96	Fire Station #16	Hose Tower	Door	Wood	White	4.8	1
97	Fire Station #16	Hose Tower	Door frame	Wood	Green	5.4	1.8
98	Fire Station #16	Hose Tower	Door jamb	Wood	White	2.4	0.6
99	Fire Station #16	Hose Tower	Ladder	Metal	Gray	4.9	0.8
100	Fire Station #16	Hose Tower	Guard rail	Metal	Gray	< LOD	0.03
101	Fire Station #16	Gym	Wall	CMU	Red	< LOD	0.03
102	Fire Station #16	Gym	Wall	Concrete	Red	< LOD	0.16
103	Fire Station #16	Gym	Wall	Plaster	White	< LOD	0.83
104	Fire Station #16	Gym	Ceiling	Plaster	White	< LOD	0.03

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
105	Fire Station #16	Gym	Wall Trim	Plaster	Gold	< LOD	0.86
106	Fire Station #16	Gym	Wall Trim	Plaster	Black	< LOD	0.09
107	Fire Station #16	Gym	Window sill	Wood	Black	0.12	0.07
108	Fire Station #16	Gym	Window apron	Wood	Black	< LOD	0.14
109	Fire Station #16	Gym	Window casing	Metal	Black	< LOD	0.03
110	Fire Station #16	Gym	Door	Wood	White	< LOD	0.03
111	Fire Station #16	Gym	Door frame	Wood	White	0.1	0.05
112	Fire Station #16	Gym	Door jamb	Wood	White	2.1	0.5
113	Fire Station #16	Gym	Door stop	Wood	Beige	< LOD	0.6
114	Fire Station #16	Communications	Wall	Plaster	White	< LOD	0.69
115	Fire Station #16	Communications	Wall	Plaster	White	< LOD	0.85
116	Fire Station #16	Communications	Wall	Plaster	White	< LOD	0.84
117	Fire Station #16	Communications	Wall	Plaster	White	< LOD	0.03
118	Fire Station #16	Communications	Crown molding	Wood	Blue	< LOD	0.06
119	Fire Station #16	Communications	Wall	Plaster	White	< LOD	0.86

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
120	Fire Station #16	Communications	Baseboard	Wood	Gray	0.1	0.05
121	Fire Station #16	Communications	Door	Wood	Gray	< LOD	0.03
123	Fire Station #16	Communications	Door frame	Wood	Gray	< LOD	0.03
124	Fire Station #16	Communications	Door jamb	Metal	Gray	< LOD	0.03
125	Fire Station #16	Communications	Door stop	Metal	Gray	< LOD	0.03
126	Fire Station #16	Communications	Window frame	Wood	Gray	< LOD	0.14
127	Fire Station #16	Communications	Window frame	Wood	Gray	0.2	0.11
128	Fire Station #16	Communications	Window casing	Metal	Gray	1.5	0.3
129	Fire Station #16	Communications	Wall	Wood	Gray	< LOD	0.08
130	Fire Station #16	Communications	Floor register	Wood	Gray	0.5	0.3
131	Fire Station #16	Kitchen	Wall	Plaster	Yellow	< LOD	0.03
132	Fire Station #16	Kitchen	Wall	Plaster	Yellow	< LOD	0.79
133	Fire Station #16	Kitchen	Wall	Plaster	Yellow	< LOD	0.81
134	Fire Station #16	Kitchen	Wall	Plaster	Maroon	< LOD	0.85
135	Fire Station #16	Kitchen	Chair rail	Wood	Maroon	< LOD	0.03

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
136	Fire Station #16	Kitchen	Baseboard	Wood	Maroon	< LOD	0.03
137	Fire Station #16	Kitchen	Ceiling	Wood	Yellow	< LOD	0.03
138	Fire Station #16	Kitchen	Door	Wood	Maroon	< LOD	0.15
139	Fire Station #16	Kitchen	Door frame	Wood	Maroon	< LOD	0.72
140	Fire Station #16	Kitchen	Door stop	Wood	Maroon	< LOD	0.21
141	Fire Station #16	Kitchen	Door jamb	Wood	Maroon	1.4	0.3
142	Fire Station #16	Kitchen	Window sill	Wood	Maroon	< LOD	0.24
143	Fire Station #16	Kitchen	Window apron	Wood	Maroon	< LOD	0.76
144	Fire Station #16	Storage/Phone Booth	Wall	Plaster	Yellow	< LOD	0.73
145	Fire Station #16	Storage/Phone Booth	Wall	Plaster	Yellow	< LOD	0.77
146	Fire Station #16	Storage/Phone Booth	Wall	Plaster	Yellow	< LOD	0.76
147	Fire Station #16	Storage/Phone Booth	Ceiling	Plaster	Yellow	< LOD	0.11
148	Fire Station #16	Storage/Phone Booth	Ceiling	Plaster	Yellow	< LOD	0.82
149	Fire Station #16	Storage/Phone Booth	Trim	Wood	White	< LOD	0.03
150	Fire Station #16	Storage/Phone Booth	Shelf	Wood	Yellow	< LOD	0.03

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
151	Fire Station #16	Storage/Phone Booth	Door	Wood	Gray	< LOD	0.25
152	Fire Station #16	Storage/Phone Booth	Door frame	Wood	White	< LOD	0.41
153	Fire Station #16	Storage/Phone Booth	Door jamb	Wood	Gray	< LOD	0.29
154	Fire Station #16	Storage/Phone Booth	Door stop	Wood	Gray	< LOD	0.21
155	Fire Station #16	Hall/Stairwell	Floor	Concrete	Brown	< LOD	0.03
156	Fire Station #16	Hall/Stairwell	Tred	VSF (bottom layer)	Brown	5	0.8
157	Fire Station #16	Hall/Stairwell	Wall	Plaster	White	16.1	3.5
158	Fire Station #16	Hall/Stairwell	Wall	Plaster	White (upper)	< LOD	0.04
159	Fire Station #16	Hall/Stairwell	Wall	Plaster	White (upper)	12.2	2.6
160	Fire Station #16	Hall/Stairwell	Ceiling	Plaster	White	9.3	2.4
161	Fire Station #16	Hall/Stairwell	Wall	Plaster	White (upper)	10	2.7
162	Fire Station #16	Hall/Stairwell	Wall	Plaster	Red (Lower)	< LOD	0.11
163	Fire Station #16	Hall/Stairwell	Wall	Plaster	Red (Lower)	< LOD	0.1
164	Fire Station #16	Hall/Stairwell	Wall	Plaster	Red (Lower)	0.12	0.06
165	Fire Station #16	Hall/Stairwell	Baseboard	Wood	Black	< LOD	1.02

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
166	Fire Station #16	Hall/Stairwell	Stringer	Wood	Black	< LOD	1.25
167	Fire Station #16	Hall/Stairwell	Stringer	Wood	Black	< LOD	0.23
168	Fire Station #16	Hall/Stairwell	Stringer	Wood	Black	< LOD	0.19
169	Fire Station #16	Hall/Stairwell	Riser	Wood	Brown	< LOD	0.03
170	Fire Station #16	Hall/Stairwell	Balaster	Wood	Brown	< LOD	0.03
171	Fire Station #16	Hall/Stairwell	Newel post	Wood	Brown	< LOD	0.11
172	Fire Station #16	Hall/Stairwell	Handrail	Wood	Brown	< LOD	0.03
173	Fire Station #16	Hall/Stairwell	Wall trim	Wood	Black	< LOD	0.17
174	Fire Station #16	Hall/Stairwell	Wall trim	Wood	Gold	< LOD	0.6
175	Fire Station #16	Hall/Stairwell	Door	Wood	White	0.15	0.08
176	Fire Station #16	Hall/Stairwell	Door fame	Wood	White	0.23	0.12
177	Fire Station #16	Hall/Stairwell	Door jamb	Wood	White	< LOD	0.6
178	Fire Station #16	Hall/Stairwell	Door jamb	Wood	White	0.4	0.2
179	Fire Station #16	Hall/Stairwell	Door stop	Wood	White	5.1	0.9
180	Fire Station #16	Pantry (Below stairs)	Wall	Plaster	White	14	1.7

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
181	Fire Station #16	Pantry (Below stairs)	Wall	Plaster	White	1.78	4.4
182	Fire Station #16	Pantry (Below stairs)	Wall	Plaster	White	< LOD	0.13
183	Fire Station #16	Pantry (Below stairs)	Wall	Plaster	White	18	2.1
184	Fire Station #16	Pantry (Below stairs)	Ceiling	Plaster	White	13	3.5
185	Fire Station #16	Pantry (Below stairs)	Baseboard	Plaster	White	< LOD	0.03
186	Fire Station #16	Pantry (Below stairs)	Baseboard	Plaster	White	< LOD	0.03
187	Fire Station #16	Pantry (Below stairs)	Door	Wood	White	< LOD	0.07
188	Fire Station #16	Pantry (Below stairs)	Door frame	Wood	White	< LOD	0.13
189	Fire Station #16	Pantry (Below stairs)	Door jamb	Wood	White	0.1	0.05
190	Fire Station #16	Pantry (Below stairs)	Door stop	Wood	White	< LOD	0.1
191	Fire Station #16	Pantry (Below stairs)	Shelf	Wood	White	< LOD	0.03
192	Fire Station #16	Communications	Floor	VSF	Maroon	< LOD	0.03
193	Fire Station #16	Kitchen	Floor	VSF	Black	< LOD	0.03
194	Fire Station #16	Hose Tower (Lower)	Floor	Concrete	Gray	< LOD	0.13
195	Fire Station #16	Hose Tower (Lower)	Floor	Concrete	Gray	< LOD	0.03

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
196	Fire Station #16	Hose Tower (Lower)	Wall	Concrete	Yellow	< LOD	0.03
197	Fire Station #16	Hose Tower (Lower)	Wall	Concrete	Yellow	< LOD	0.03
198	Fire Station #16	Hose Tower (Lower)	Wall	Concrete	Yellow	< LOD	0.07
199	Fire Station #16	Hose Tower (Lower)	Wall	Concrete	Maroon	< LOD	0.03
200	Fire Station #16	Hose Tower (Lower)	Shelf	Wood	Maroon	< LOD	0.03
201	Fire Station #16	Exterior	Wall	Ceramic	Black	< LOD	0.03
202	Fire Station #16	Exterior	Wall	Concrete	Red	0.8	0.2
203	Fire Station #16	Exterior	Wall	Concrete	Red	1	0.3
204	Fire Station #16	Exterior	Wall	Concrete	Red	1	0.2
205	Fire Station #16	Exterior	Wall	Concrete	Red	1.4	0.4
206	Fire Station #16	Exterior	Wall	Concrete	Red	1.2	0.4
207	Fire Station #16	Exterior	Wall	Concrete	Red	< LOD	1.05
208	Fire Station #16	Exterior	Wall	Wood	Gray	< LOD	0.03
209	Fire Station #16	Exterior	Wall	Wood	Gray	0.5	2.4
210	Fire Station #16	Exterior	Wall Trim	Metal	Gray	1.7	0.3

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
211	Fire Station #16	Exterior	Wall	Concrete	Beige	< LOD	0.13
212	Fire Station #16	Exterior	Wall	Concrete	Beige	< LOD	0.05
213	Fire Station #16	Exterior	Wall	Concrete	Beige	< LOD	0.05
214	Fire Station #16	Exterior	Window sill	Concrete	Beige	0.21	0.08
215	Fire Station #16	Exterior	Door	Wood	Beige	< LOD	0.14
216	Fire Station #16	Exterior	Door	Wood	Beige	< LOD	0.03
217	Fire Station #16	Exterior	Door jamb	Wood	Beige	1.7	0.3
218	Fire Station #16	Exterior	Door stop	Wood	Beige	1.2	0.2
219	Fire Station #16	Exterior	Down spout	Metal	Beige	< LOD	0.04
220	Fire Station #16	Ext. Courtyard	Wall	Concrete	White	< LOD	0.04
221	Fire Station #16	Ext. Courtyard	Wall	Concrete	White	< LOD	0.16
222	Fire Station #16	Ext. Courtyard	Wall	Wood	Green	0.8	0.3
223	Fire Station #16	Ext. Courtyard	Wall	Wood	Green	0.4	0.1
224	Fire Station #16	Ext. Courtyard	Wall	Wood	White	3.3	1.4
225	Fire Station #16	Ext. Courtyard	Wall	Wood	White	3.4	0.6

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
226	Fire Station #16	Ext. Courtyard	Fence gate	Wood	White	3.5	0.7
227	Fire Station #16	Ext. Courtyard	Fence framing	Wood	White	1.1	0.2
228	Fire Station #16	Ext. Courtyard	Fence framing	Wood	White	1.2	0.4
229	Fire Station #16	Ext. Courtyard	Fence framing	Wood	White	3.5	1
230	Fire Station #16	Ext. Courtyard	BBQ Shed Doors	Metal	White	1.4	0.2
231	Fire Station #16	Ext. Courtyard	BBQ Shed Floor	Concrete	Tan	< LOD	0.04
232	Fire Station #16	Ext. Courtyard	BBQ Shed Wall	Metal	Black	1.2	0.2
233	Fire Station #16	Ext. Courtyard	BBQ Shed Wall	Metal	Black	0.6	0.1
2334	Fire Station #16	Ext. Courtyard	BBQ Shed Wall	Metal	Red-Orange	0.9	0.1
235	Fire Station #16	Ext. Courtyard	BBQ Shed Wall	Metal	Red-Orange	0.23	0.14
236	Fire Station #16	Ext. Courtyard	BBQ Shed Ceiling	Metal	Black	1.5	0.5
237	Fire Station #16	Ext. Courtyard	BBQ Shed door casing	Metal	Black	1.7	0.6
238	Fire Station #16	Ext. Courtyard	BBQ Shed door frame	Wood	BEIGE	3.5	0.8
239	Fire Station #16	Ext. Courtyard	Generator	Metal	Green	< LOD	0.03
240	Fire Station #16	Ext. Courtyard	Window sill	Concrete	Beige	< LOD	0.04

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm²)	Pb Error (+/-)
241	Fire Station #16	Exterior	Fascia	Concrete	Black	< LOD	0.09
[redacted]							
249	Fire Station #16	Hose Tower (Plenum)	I-Beam	Metal	Black	4.3	0.3
250	Fire Station #16	Boiler/Mechanical	Tank	Metal	Orange	2.6	0.3
251	Fire Station #16	Boiler/Mechanical	Tank support beams	Metal	Green	0.28	0.06
252	Fire Station #16	Boiler/Mechanical	Water heater	Metal	Beige	< LOD	0.03
253	Fire Station #16	Boiler/Mechanical	Furnace	Metal	Blue	< LOD	0.03
254	Fire Station #16	Boiler/Mechanical	Boiler	Metal	Blue	< LOD	0.03
255	Fire Station #16	Boiler/Mechanical	16 in. Pipe	Concrete	Gray	0.3	0.06

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
256	Fire Station #16	Exterior	Wall	Concrete	Red	2.4	0.9
257	Fire Station #16	Exterior	Bollard guard	Metal	Red	< LOD	0.03
258	Fire Station #16	Exterior	Flag pole	Metal	Red	11.8	1.7
259	Fire Station #16	Exterior	Flag pole	Wood	White	14.3	1.6
260	Fire Station #16	Exterior	Gate	Metal	Brown	< LOD	0.04
261	Fire Station #16	2nd Floor Corridor	Wall	Plaster	White	< LOD	0.86
262	Fire Station #16	2nd Floor Corridor	Wall	Plaster	White	< LOD	0.03
263	Fire Station #16	2nd Floor Corridor	Wall	Plaster	White	< LOD	0.78
264	Fire Station #16	2nd Floor Corridor	Wall	Plaster	White	< LOD	0.78
265	Fire Station #16	2nd Floor Corridor	Ceiling	Plaster	White	< LOD	0.03
266	Fire Station #16	2nd Floor Corridor	Baseboard	Wood	White	0.12	0.05
267	Fire Station #16	2nd Floor Corridor	Floor	VSF	Maroon	< LOD	0.03
268	Fire Station #16	2nd Floor Corridor	Door	Wood	White	< LOD	0.03
269	Fire Station #16	2nd Floor Corridor	Door frame	Wood	White	< LOD	0.03
270	Fire Station #16	2nd Floor Corridor	Door jamb	Metal	White	< LOD	0.03

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
271	Fire Station #16	2nd Floor Corridor	Door stop	Metal	White	< LOD	0.03
272	Fire Station #16	2nd Floor Corridor	Window sill	Wood	White	0.15	0.08
273	Fire Station #16	2nd Floor Corridor	Window apron	Wood	White	0.12	0.07
274	Fire Station #16	2nd Floor Corridor	Window casing	Metal	White	< LOD	0.45
275	Fire Station #16	2nd Floor Corridor	Wall	Plaster	White	< LOD	0.03
276	Fire Station #16	Dormitory	Wall (Upper)	Plaster	White	< LOD	0.03
277	Fire Station #16	Dormitory	Wall (Upper)	Plaster	White	< LOD	0.76
278	Fire Station #16	Dormitory	Wall (Upper)	Plaster	White	< LOD	0.03
279	Fire Station #16	Dormitory	Wall (Upper)	Plaster	White	< LOD	0.03
280	Fire Station #16	Dormitory	Wall (Lower)	Plaster	Beige	< LOD	0.03
281	Fire Station #16	Dormitory	Wall (Lower)	Plaster	Beige	< LOD	0.7
282	Fire Station #16	Dormitory	Wall (Lower)	Plaster	Beige	< LOD	0.03
283	Fire Station #16	Dormitory	Wall (Lower)	Plaster	Beige	< LOD	0.03
284	Fire Station #16	Dormitory	Ceiling	Plaster	White	8.7	1.3
285	Fire Station #16	Dormitory	Pony wall	Drywall	Beige	< LOD	0.03

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
286	Fire Station #16	Dormitory	Baseboard	Wood	Beige	0.14	0.06
287	Fire Station #16	Dormitory	Floor	VSF	Maroon	< LOD	0.03
288	Fire Station #16	Dormitory	Window sill	Wood	White	0.13	0.07
289	Fire Station #16	Dormitory	Window apron	Wood	White	0.13	0.05
290	Fire Station #16	Dormitory	Door	Wood	White	< LOD	0.03
291	Fire Station #16	Dormitory	Door frame	Wood	White	< LOD	0.03
292	Fire Station #16	Dormitory	Door jamb	Metal	White	< LOD	0.03
293	Fire Station #16	Dormitory	Door stop	Metal	White	< LOD	0.03
294	Fire Station #16	Men's Toilet	Wall (upper)	Plaster	White	18.4	1.9
295	Fire Station #16	Men's Toilet	Wall (upper)	Plaster	White	11.9	2.7
296	Fire Station #16	Men's Toilet	Wall (upper)	Plaster	White	17.3	3.9
297	Fire Station #16	Men's Toilet	Wall (upper)	Plaster	White	< LOD	0.89
298	Fire Station #16	Men's Toilet	Ceiling	Plaster	White	13.3	3
299	Fire Station #16	Men's Toilet	Wall (Lower)	Ceramic	Green	9.4	2.8
300	Fire Station #16	Men's Toilet	Wall (Lower)	Ceramic	Green	9	1.4

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
301	Fire Station #16	Men's Toilet	Wall (Lower)	Ceramic	Green	8.8	2.6
302	Fire Station #16	Men's Toilet	Wall (Lower)	Ceramic	Green	9	2.7
303	Fire Station #16	Men's Toilet	Floor	Ceramic	Green	< LOD	0.03
304	Fire Station #16	Men's Toilet	Wall heater	Metal	White	0.05	0.03
305	Fire Station #16	Men's Toilet	Floor	Concrete	Gray	< LOD	0.03
306	Fire Station #16	Men's Toilet	Sink	Porcelain	Green	8.9	2.7
307	Fire Station #16	Men's Toilet	Sink	Porcelain	White	25.9	2.6
308	Fire Station #16	Men's Toilet	Toilet	Porcelain	White	< LOD	0.07
309	Fire Station #16	Men's Toilet	Sink	Porcelain	White	7.7	1.5
310	Fire Station #16	Men's Toilet	Partition	Metal	White	0.7	0.2
311	Fire Station #16	Men's Toilet	Urinal	Porcelain	White	4.4	1.3
312	Fire Station #16	Men's Toilet	Window casing	Metal	White	4.9	1.3
313	Fire Station #16	Men's Toilet	Door	Wood	White	< LOD	0.15
314	Fire Station #16	Men's Toilet	Door jamb	Wood	White	9.6	2.4
315	Fire Station #16	Men's Toilet	Door stop	Wood	White	0.03	0.02

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
316	Fire Station #16	Men's Locker	Wall	Plaster	White	< LOD	0.03
317	Fire Station #16	Men's Locker	Wall	Plaster	White	< LOD	0.03
318	Fire Station #16	Men's Locker	Wall	Plaster	White	< LOD	0.03
319	Fire Station #16	Men's Locker	Wall	Plaster	White	< LOD	0.03
320	Fire Station #16	Men's Locker	Ceiling	Plaster	White	< LOD	0.03
321	Fire Station #16	Men's Locker	Ceiling	Plaster	White	< LOD	0.03
322	Fire Station #16	Men's Locker	Floor	Concrete	Gray	< LOD	0.03
323	Fire Station #16	Men's Locker	Door	Wood	White	< LOD	0.03
324	Fire Station #16	Men's Locker	Door frame	Wood	White	< LOD	0.03
325	Fire Station #16	Men's Locker	Door jamb	Metal	White	< LOD	0.03
326	Fire Station #16	Men's Locker	Door stop	Metal	White	< LOD	0.03
327	Fire Station #16	Women's Locker/Toilet	Wall	Drywall	White	< LOD	0.03
328	Fire Station #16	Women's Locker/Toilet	Wall	Drywall	White	< LOD	0.03
329	Fire Station #16	Women's Locker/Toilet	Wall	Drywall	White	< LOD	0.03
330	Fire Station #16	Women's Locker/Toilet	Wall	Drywall	White	< LOD	0.03

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
331	Fire Station #16	Women's Locker/Toilet	Wall	Drywall	White	< LOD	0.03
332	Fire Station #16	Women's Locker/Toilet	Ceiling	Drywall	White	< LOD	0.03
333	Fire Station #16	Women's Locker/Toilet	Floor	Concrete	Gray	< LOD	0.03
334	Fire Station #16	Women's Locker/Toilet	Wall	Ceramic	Peach	< LOD	1.09
335	Fire Station #16	Women's Locker/Toilet	Toilet	Porcelain	White	< LOD	0.03
336	Fire Station #16	Women's Locker/Toilet	Sink	Porcelain	White	< LOD	0.03
337	Fire Station #16	Women's Locker/Toilet	Door	Wood	White	< LOD	0.03
338	Fire Station #16	Women's Locker/Toilet	Door frame	Wood	White	< LOD	0.03
339	Fire Station #16	Women's Locker/Toilet	Door jamb	Metal	White	< LOD	0.03
340	Fire Station #16	Women's Locker/Toilet	Door stop	Metal	White	< LOD	0.03
341	Fire Station #16	Storage Closet	Door stop	Metal	White	< LOD	0.03
342	Fire Station #16	Storage Closet	Door jamb	Metal	White	< LOD	0.03
343	Fire Station #16	Storage Closet	Door frame	Wood	White	< LOD	0.03
344	Fire Station #16	Storage Closet	Wall	Plaster	White	0.08	0.04
345	Fire Station #16	Storage Closet	Wall	Plaster	White	< LOD	0.75

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
346	Fire Station #16	Storage Closet	Wall	Plaster	White	< LOD	0.03
347	Fire Station #16	Storage Closet	Wall	Plaster	White	0.05	0.02
348	Fire Station #16	Storage Closet	Ceiling	Plaster	White	< LOD	0.73
349	Fire Station #16	Officer's Toilet	Wall	Plaster	White	< LOD	0.03
350	Fire Station #16	Officer's Toilet	Wall	Plaster	White	< LOD	0.03
351	Fire Station #16	Officer's Toilet	Wall	Plaster	White	< LOD	0.03
352	Fire Station #16	Officer's Toilet	Wall	Plaster	White	< LOD	0.03
353	Fire Station #16	Officer's Toilet	Ceiling	Plaster	White	< LOD	0.03
354	Fire Station #16	Officer's Toilet	Floor	Concrete	Gray	< LOD	0.03
355	Fire Station #16	Officer's Toilet	Wall	Ceramic	Green	< LOD	0.03
356	Fire Station #16	Officer's Toilet	Toilet	Porcelain	White	< LOD	0.03
357	Fire Station #16	Officer's Toilet	Sink	Porcelain	White	< LOD	0.21
358	Fire Station #16	Officer's Toilet	Door	Wood	White	< LOD	0.03
359	Fire Station #16	Officer's Toilet	Door frame	Wood	White	< LOD	0.03
360	Fire Station #16	Officer's Toilet	Door jamb	Metal	White	< LOD	0.03

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
361	Fire Station #16	Officer's Toilet	Door stop	Metal	White	< LOD	0.03
362	Fire Station #16	Officer's Room (SW)	Door stop	Metal	White	< LOD	0.03
363	Fire Station #16	Officer's Room (SW)	Door jamb	Metal	White	< LOD	0.03
364	Fire Station #16	Officer's Room (SW)	Door frame	Wood	White	< LOD	0.03
365	Fire Station #16	Officer's Room (SW)	Door	Wood	White	< LOD	0.03
366	Fire Station #16	Officer's Room (SW)	Wall	Plaster	White	< LOD	0.77
367	Fire Station #16	Officer's Room (SW)	Wall	Plaster	White	< LOD	0.04
368	Fire Station #16	Officer's Room (SW)	Wall	Plaster	White	< LOD	0.06
369	Fire Station #16	Officer's Room (SW)	Wall	Plaster	White	< LOD	0.84
370	Fire Station #16	Officer's Room (SW)	Ceiling	Plaster	White	< LOD	0.78
371	Fire Station #16	Officer's Room (SW)	Baseboard	Wood	White	0.12	0.06
372	Fire Station #16	Officer's Room (SW)	Window sill	Wood	White	0.08	0.05
373	Fire Station #16	Officer's Room (SW)	Window apron	Wood	White	< LOD	0.22
374	Fire Station #16	Officer's Room (SW)	Wall heater	Metal	White	< LOD	0.08
375	Fire Station #16	Officer's Room (SE)	Wall	Plaster	White	< LOD	0.03

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
376	Fire Station #16	Officer's Room (SE)	Wall	Plaster	White	< LOD	0.67
377	Fire Station #16	Officer's Room (SE)	Wall	Plaster	White	< LOD	0.85
378	Fire Station #16	Officer's Room (SE)	Wall	Plaster	White	< LOD	0.67
379	Fire Station #16	Officer's Room (SE)	Ceiling	Plaster	White	< LOD	0.69
380	Fire Station #16	Officer's Room (SE)	Door	Wood	White	< LOD	0.07
381	Fire Station #16	Officer's Room (SE)	Door frame	Wood	White	< LOD	0.07
382	Fire Station #16	Officer's Room (SE)	Door jamb	Wood	White	0.13	0.07
383	Fire Station #16	Officer's Room (SE)	Door stop	Wood	White	0.12	0.05
384	Fire Station #16	Officer's Room (SE)	Wall heater	Metal	White	< LOD	0.05
385	Fire Station #16	Officer's Room (SE)	Baseboard	Wood	White	< LOD	0.03
386	Fire Station #16	Officer's Room (SE)	Baseboard	Wood	White	< LOD	0.03
387	Fire Station #16	Officer's Room (SE)	Window sill	Wood	White	0.07	0.04
388	Fire Station #16	Officer's Room (SE)	Window apron	Wood	White	< LOD	0.12
389	Fire Station #16	Officer's Room (SE)	Floor	VSF	Red	< LOD	0.03
390	Fire Station #16	Stairwell to roof	Tread	VSF	Brown	0.25	0.09

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
391	Fire Station #16	Stairwell to roof	Handrail	Metal	White	2	0.3
392	Fire Station #16	Stairwell to roof	Stringer	Wood	White	0.25	0.1
393	Fire Station #16	Stairwell to roof	Wall	Plaster	White	15.7	3.2
394	Fire Station #16	Stairwell to roof	Wall	Plaster	White	0.06	0.03
395	Fire Station #16	Stairwell to roof	Wall	Plaster	White	0.09	0.04
396	Fire Station #16	Stairwell to roof	Wall	Plaster	White	< LOD	0.74
397	Fire Station #16	Stairwell to roof	Ceiling	Plaster	White	< LOD	0.75
398	Fire Station #16	Stairwell to roof	HVAC Duct	Metal	White	< LOD	0.03
399	Fire Station #16	Stairwell to roof	Vert.Pipe	Metal	White	< LOD	0.03
400	Fire Station #16	Stairwell to roof	Door	Wood	White	0.17	0.05
401	Fire Station #16	Stairwell to roof	Door frame	Wood	White	0.18	0.07
402	Fire Station #16	Stairwell to roof	Door jamb	Wood	White	< LOD	0.38
403	Fire Station #16	Stairwell to roof	Door jamb	Wood	White	0.21	0.07
404	Fire Station #16	Stairwell to roof	Door stop	Wood	White	0.11	0.05
405	Fire Station #16	Stairwell to roof	Stair riser	Wood	White	0.15	0.05

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
406	Fire Station #16	Stairwell to roof	Plenum door	Wood	White	0.1	0.04
407	Fire Station #16	Stairwell to roof	Plenum door threshold	Wood	White	0.5	0.2
408	Fire Station #16	Stairwell to roof	Door frame	Wood	White	0.17	0.07
409	Fire Station #16	Stairwell to roof	Door jamb	Wood	White	< LOD	0.19
410	Fire Station #16	Stairwell to roof	Window sill	Wood	White	0.16	0.07
411	Fire Station #16	Stairwell to roof	Window apron	Wood	White	0.15	0.1
412	Fire Station #16	Stairwell to roof	Baseboard	Wood	White	0.14	0.09
413	Fire Station #16	Roof	Floor	Wood	Green	0.08	0.04
414	Fire Station #16	Roof	Door	Metal	Beige	0.4	0.1
415	Fire Station #16	Roof	Door frame	Metal	Beige	0.2	0.08
416	Fire Station #16	Roof	Door jamb	Metal	Beige	3	0.8
417	Fire Station #16	Roof	Door stop	Metal	Beige	3.7	1.6
418	Fire Station #16	Roof	Eave	Metal	Beige	2.5	0.9
419	Fire Station #16	Roof	Wall	Metal	Beige	2.8	1
420	Fire Station #16	Roof	Wall	Concrete	Beige	< LOD	0.05

Table 2. Survey of painted surface sample summary for Fire House No. 16, San Francisco, CA.							
Reading No	Site - Building	Room Equivalent	Component	Substrate	Color	Pb (mg/cm^2)	Pb Error (+/-)
421	Fire Station #16	Roof	Wall	Concrete	Beige	< LOD	0.06
422	Fire Station #16	Roof	Wall	Concrete	Beige	< LOD	0.07
423	Fire Station #16	Roof	Fence framing	Wood	Beige	< LOD	0.03
424	Fire Station #16	Roof	HVAC duct	Metal	Beige	< LOD	0.03
425	Fire Station #16	Roof	Roof jack	Metal	Gray	58.1	3.7
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Calibration and/or Standardization
See Note 1 Below.
Lead-Based Paint and/or Component.

NOTE 1: It is important to understand that Cal/OSHA does not give a regulatory definition of a "lead-containing material." Cal/OSHA and Federal OSHA are concerned with "an employee occupationally exposed to lead." This is understood to mean material disturbed during construction work containing lead in any amount (i.e., lead-containing paint and lead-based paint) is covered under the lead in construction standard. Additionally, Federal OSHA has determined that the uses of XRF data and/or bulk sampling data (e.g., paint chips) are not acceptable for predicting employee exposures to lead. This fact means that contractors cannot use XRF data, paint chip data or bulk sample data as a surrogate for employee exposures during construction work (or the bidding process) as defined in 8 CCR 1532.1(a). The two OSHA interpretation letters below should be reviewed. Again, in summary they state, the burden of proof is on the employer in regards to employee exposures to lead in construction work and not the reliance on XRF data, bulk sampling data or paint chip sampling data:
http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=23455
http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=22701

APPENDIX A

ALSF Laboratory - Asbestos Bulk Sample
Analytical Laboratory Report

ALSF ANALYTICAL LABS SAN FRANCISCO INC.

POLARIZED LIGHT MICROSCOPY ANALYSIS FOR ASBESTOS CONTENT

Client: MILLENNIUM ENVIRONMENTAL
CONSULTING ASSOCIATES
620 CONTRA COSTA BLVD., SUITE 102
PLEASANT HILL, CALIFORNIA 94523

P.O. #: 7526
Job #: 3072.2083
Location: CCSF-ESEA FIRE STATION, FIREHOUSE #16
DEMO SURVEY

Report Number: ZH0301
Date: AUGUST 9, 2012
Analyst: OLGA KIST
Date Completed: AUGUST 9, 2012
Sample Collector: TYLER BELAIR
Collection Date: AUGUST 2, 2012

9 Sample(s) containing Asbestos

95 Sample(s) Analyzed
95 Sample(s) Received 8/3/12 11:19

Sample #	Location / Description	ASBESTOS TYPE AND RANGE % OR NONE DETECTED	NONASBESTOS Fibers (%) Balance on File
1. 120802.901	**1ST FLOOR KITCHEN / BLACK SHEET FLOORING**		
	A) BROWN-PAINTED PLASTIC & VINYL WITH FIBERGLASS	NONE DETECTED	
	B) OFF-WHITE GLUE	NONE DETECTED	
2. 120802.902	**FIRST FLOOR KITCHEN / BLACK SHEET FLOORING**		
	A) BROWN-PAINTED PLASTIC & VINYL WITH FIBERGLASS	NONE DETECTED	
	B) OFF-WHITE GLUE	NONE DETECTED	
	C) TAN RUBBER LEVELING PLASTER	NONE DETECTED	CELL, SYN <1-2
3. 120802.903	**1ST FLOOR OFFICE / COVE BASE MASTIC ASSOCIATED WITH 6" TAN CB**		
	A) OFF-WHITE VINYL	NONE DETECTED	
	B) OFF-WHITE GLUE WITH PAPER	NONE DETECTED	CELL 10-20
4. 120802.904	**1ST FLOOR TV ROOM / COVE BASE MASTIC ASSOCIATED WITH 6" TAN CB**		
	A) YELLOW GLUE AND PAINT	NONE DETECTED	
	B) OFF-WHITE COMPOUND	NONE DETECTED	
5. 120802.905	**1ST FLOOR RR #1 / 2" X 2" CERAMIC FT MORTAR**		
	GRAY MORTAR	NONE DETECTED	CELL <1
6. 120802.906	**1ST FLOOR RR #1 / 2" X 2" CERAMIC FT MORTAR**		
	A) GOLD PORCELAIN TILE	NONE DETECTED	
	B) GRAY MORTAR	NONE DETECTED	

CHRYS: Chrysotile
AMOS: Amosite
CROC: Crocidolite
TREM: Tremolite/Actinolite
ANTH: Anthophyllite

CELL: Cellulose
GL: Fiberglass/Mineral Wool
SYN: Synthetic
CARB: Carbonates
SILI: Mixed Silicates

POLY: Polyethylene
FTALC: Fibrous Talc
FGYP: Fibrous Gypsum
FELD: Feldspar
CASI: Calcium Silicates

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AUTHORIZED SIGNATURE _____ DATE 8/10/12

467 Potrero Avenue, San Francisco, CA 94110 (415) 552-4595 FAX 552-0730

ALSF ANALYTICAL LABS SAN FRANCISCO INC.

POLARIZED LIGHT MICROSCOPY ANALYSIS FOR ASBESTOS CONTENT

Client: MILLENNIUM ENVIRONMENTAL
CONSULTING ASSOCIATES
620 CONTRA COSTA BLVD., SUITE 102
PLEASANT HILL, CALIFORNIA 94523

P.O. #: 7526
Job #: 3072.2083
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DEMO SURVEY

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Sample Collector: TYLER BELAIR
Collection Date: AUGUST 2, 2012

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Sample #	Location / Description	ASBESTOS TYPE AND RANGE % OR NONE DETECTED	NONASBESTOS Fibers (%) Balance on File
7. 120802.907	**1ST FLOOR RR#1 / 2" X 2" CERAMIC FT GROUT**		
	A) GOLD CERAMIC TILE	NONE DETECTED	
	B) WHITE GROUT	NONE DETECTED	
8. 120802.908	**1ST FLOOR RR#1 / 2" X 2" CERAMIC FT GROUT**		
	A) WHITE GROUT	NONE DETECTED	
	B) GRAY MORTAR	NONE DETECTED	
9. 120802.909	**1ST FLOOR RR #1 / 4" X 4" CERAMIC WT GROUT**		
	WHITE GROUT	NONE DETECTED	
10. 120802.910	**1ST FLOOR RR #1 / 4" X 4" CERAMIC WT GROUT**		
	WHITE GROUT	NONE DETECTED	
11. 120802.911	**SAUNA / TILE GROUT**		
	WHITE GROUT	NONE DETECTED	CELL <1
12. 120802.912	**SAUNA / TILE GROUT**		
	WHITE GROUT	NONE DETECTED	CELL, HAIR <1
13. 120802.913	**SAUNA / TILE MORTAR**		
	GRAY MORTAR	NONE DETECTED	
14. 120802.914	**SAUNA / TILE MORTAR**		
	GRAY MORTAR	NONE DETECTED	CELL <1

CHRYS: Chrysotile
AMOS: Amosite
CROC: Crocidolite
TREM: Tremolite/Actinolite
ANTH: Anthophyllite

CELL: Cellulose
GL: Fiberglass/Mineral Wool
SYN: Synthetic
CARB: Carbonates
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ALSF ANALYTICAL LABS SAN FRANCISCO INC.

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PLEASANT HILL, CALIFORNIA 94523

P.O. #: 7526
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DEMO SURVEY

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Date Completed: AUGUST 9, 2012
Sample Collector: TYLER BELAIR
Collection Date: AUGUST 2, 2012

9 Sample(s) containing Asbestos

95 Sample(s) Analyzed
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Sample #	Location / Description	ASBESTOS TYPE AND RANGE % OR NONE DETECTED	NONASBESTOS Fibers (%) Balance on File
15. 120802.915	**SAUNA / VAPOR BARRIER**		
	BROWN-BLACK FELT AND TAR WITH SILVER STRIPE	NONE DETECTED	CELL 60-70, SYN <1
16. 120802.916	**SAUNA / VAPOR BARRIER**		
	BROWN-BLACK FELT AND TAR WITH SILVER STRIPE	NONE DETECTED	CELL 60-70, SYN <1
17. 120802.917	**BASEMENT MECHANICAL ROOM / 16" TRANSITE PIPE**		
	GRAY ACM CEMENT	**CHRYS 5-15, CROC 5-10**	
18. 120802.918	**BASEMENT MECHANICAL ROOM / 16" TRANSITE PIPE**		
	GRAY-PAINTED ACM CEMENT	**CHRYS 10-15, CROC 5-10**	
19. 120802.919	**1ST FLOOR GYM AREA / CARPET MASTIC (YELLOW)**		
	BROWN-OFF-WHITE GLUE WITH WAX	NONE DETECTED	CELL <1
20. 120802.920	**1ST FLOOR GYM AREA / CARPET MASTIC (YELLOW)**		
	A) BROWN-GOLD GLUES	NONE DETECTED	CELL, SYN <1
	B) WHITE GLUE	NONE DETECTED	
21. 120802.921	**1ST FLOOR RR #1 / 4" X 4" CERAMIC WT MORTAR**		
	A) GOLD CERAMIC TILE	NONE DETECTED	
	B) GRAY MORTAR	NONE DETECTED	

CHRYS: Chrysotile
AMOS: Amosite
CROC: Crocidolite
TREM: Tremolite/Actinolite
ANTH: Anthophyllite

CELL: Cellulose
GL: Fiberglass/Mineral Wool
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Analyst: OLGA KIST
Date Completed: AUGUST 9, 2012
Sample Collector: TYLER BELAIR
Collection Date: AUGUST 2, 2012

P.O. #: 7526
Job #: 3072.2083
Location: CCSF-ESEA FIRE STATION, FIREHOUSE #16
DEMO SURVEY

9 Sample(s) containing Asbestos

95 Sample(s) Analyzed
95 Sample(s) Received 8/3/12 11:19

Sample #	Location / Description	*ASBESTOS* TYPE AND RANGE % OR NONE DETECTED		NONASBESTOS Fibers (%) Balance on File
22. 120802.922	**1ST FLOOR RR #1 / 4" X 4" CERAMIC WT MORTAR**			
	A) GOLD CERAMIC TILE	NONE DETECTED		
	B) GRAY MORTAR	NONE DETECTED		
	C) WHITE COMPOUND	NONE DETECTED		
23. 120802.923	**1ST FLOOR STAIRS / RED SHEET FLOORING WITH BACKING AND YELLOW MASTIC (TOP) BROWN SHEET FLOORING WITH BACKING AND BLACK MASTIC (BOTTOM)**			
	A) BLACK-RED VINYL WITH JUTE BACKING	NONE DETECTED	CELL 30-40	
	B) GOLD GLUE	NONE DETECTED		
	C) BROWN VINYL WITH JUTE	NONE DETECTED	CELL 20-30	
	D) OFF-WHITE LEVELING PLASTER/GLUE	NONE DETECTED		
24. 120802.924	**1ST FLOOR STAIRS / RED SHEET FLOORING WITH BACKING AND YELLOW MASTIC (TOP) BROWN SHEET FLOORING WITH BACKING AND BLACK MASTIC (BOTTOM)**			
	A) BLACK-RED VINYL WITH JUTE BACKING	NONE DETECTED	CELL 30-40	
	B) GOLD GLUE	NONE DETECTED		
	C) BROWN VINYL WITH JUTE	NONE DETECTED	CELL 20-30	
	D) OFF-WHITE LEVELING PLASTER/GLUE	NONE DETECTED		
	E) BLACK-BROWN GLUE	NONE DETECTED		
25. 120802.925	**1ST FLOOR GARAGE / NEW TSI ON CEILING PIPES AND CHANGERS**			
	PINK INSULATION	NONE DETECTED	SYN, GL 2-5	
26. 120802.926	**1ST FLOOR TV ROOM / NEW TSI ON CEILING PIPES AND CHANGERS**			
	PINK INSULATION	NONE DETECTED	SYN, GL 2-5	

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Sample #	Location / Description	*ASBESTOS* TYPE AND RANGE % OR NONE DETECTED	NONASBESTOS Fibers (%) Balance on File
27. 120802.927	BASEMENT MECHANICAL ROOM / TSI (6" PIPE) WHITE INSULATION WITH COTTON CANVAS	CHRYS 5-10, AMOS 5-10	CELL 60-70
28. 120802.928	BASEMENT MECHANICAL ROOM / TSI (6" PIPE) WHITE INSULATION WITH COTTON CANVAS	CHRYS 5-10, AMOS 5-10	CELL 50-60
29. 120802.929	1ST FLOOR BREAK ROOM / BLACK/RED SHEET FLOORING WITH BACKING AND YELLOW MASTIC		
	A) RED-BLACK VINYL WITH JUTE BACKING	NONE DETECTED	CELL 30-40
	B) YELLOW GLUE	NONE DETECTED	
30. 120802.930	1ST FLOOR BREAK ROOM / BLACK/RED SHEET FLOORING WITH BACKING AND YELLOW MASTIC		
	A) RED-BLACK VINYL WITH JUTE BACKING	NONE DETECTED	CELL 30-40
	B) YELLOW GLUE	NONE DETECTED	
	C) BROWN SURFACE WAX WITH DEBRIS	NONE DETECTED	CELL, HAIR 1-3
31. 120802.931	2ND FLOOR HALL / BLACK/RED SHEET FLOORING WITH BACKING AND YELLOW MASTIC		
	A) RED-BLACK VINYL WITH JUTE	NONE DETECTED	CELL 30-40
	B) YELLOW GLUE	NONE DETECTED	
32. 120802.932	2ND FLOOR HALL / COVE BASE MASTIC (YELLOW) ASSOCIATED WITH 4" BROWN CB		
	A) YELLOW GLUE	NONE DETECTED	BINDERS. CARB, MICA, SYN, MISC.
	B) WHITE PAINT	NONE DETECTED	
	C) WHITE COMPOUND	NONE DETECTED	

CHRYS: Chrysotile
AMOS: Amosite
CROC: Crocidolite
TREM: Tremolite/Actinolite
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CELL: Cellulose
GL: Fiberglass/Mineral Wool
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Sample #	Location / Description	ASBESTOS TYPE AND RANGE % OR NONE DETECTED	NONASBESTOS Fibers (%) Balance on File
33. 120802.933	2ND FLOOR HALL / COVE BASE MASTIC (YELLOW) ASSOCIATED WITH 4" BROWN CB		
	A) GOLD GLUE	NONE DETECTED	
	B) WHITE PAINT	NONE DETECTED	
	C) WHITE COMPOUND	NONE DETECTED	
34. 120802.934	2ND FLOOR STAIRS TO ROOF / BROWN BATTLESHIP WITH BLACK BACKING		
	A) BROWN VINYL WITH JUTE BACKING	NONE DETECTED	CELL 20-30
	B) BROWN GLUE	NONE DETECTED	
	C) BLACK FELT AND TAR	NONE DETECTED	CELL 50-60
	D) BROWN GLUE	NONE DETECTED	
35. 120802.935	2ND FLOOR STAIRS TO ROOF / BROWN BATTLESHIP WITH BLACK BACKING		
	A) BROWN VINYL WITH JUTE BACKING	NONE DETECTED	CELL 20-30
	B) BROWN GLUE	NONE DETECTED	
	C) BLACK FELT AND TAR	NONE DETECTED	CELL, SYN, HAIR, LEATHER 50-60
	D) BROWN GLUE	NONE DETECTED	
36. 120802.936	STAIR LANDING AT ROOF / BLACK SHEET FLOORING WITH BACKING		
	A) BLACK VINYL WITH SAND TEXTURE AND NYLON	NONE DETECTED	SYN, GL 5-15
	B) BLACK GUMMY TAR	NONE DETECTED	
	C) BLACK FELT AND TAR	NONE DETECTED	CELL 60-70
	D) BLACK GUMMY TAR	NONE DETECTED	

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AMOS: Amosite
CROC: Crocidolite
TREM: Tremolite/Actinolite
ANTH: Anthophyllite

CELL: Cellulose
GL: Fiberglass/Mineral Wool
SYN: Synthetic
CARB: Carbonates
SILI: Mixed Silicates

POLY: Polyethylene
FTALC: Fibrous Talc
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FELD: Feldspar
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467 Potrero Avenue, San Francisco, CA 94110 (415) 552-4595 FAX 552-0730

ALSF ANALYTICAL LABS SAN FRANCISCO INC.

POLARIZED LIGHT MICROSCOPY ANALYSIS FOR ASBESTOS CONTENT

Client: MILLENNIUM ENVIRONMENTAL
CONSULTING ASSOCIATES
620 CONTRA COSTA BLVD., SUITE 102
PLEASANT HILL, CALIFORNIA 94523

P.O. #: 7526
Job #: 3072.2083
Location: CCSF-ESEA FIRE STATION, FIREHOUSE #16
DEMO SURVEY

Report Number: ZH0301
Date: AUGUST 9, 2012
Analyst: OLGA KIST
Date Completed: AUGUST 9, 2012
Sample Collector: TYLER BELAIR
Collection Date: AUGUST 2, 2012

9 Sample(s) containing Asbestos

95 Sample(s) Analyzed
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37. 120802.937	**STAIR LANDING AT ROOF / BLACK SHEET FLOORING WITH BACKING**		
	A) BLACK VINYL WITH NYLON MESH BACKING	NONE DETECTED	SYN, GL 5-15
	B) BLACK GUMMY TAR	NONE DETECTED	
	C) BLACK FELT AND TAR	NONE DETECTED	CELL 60-70
	D) BLACK GUMMY TAR	NONE DETECTED	
38. 120802.938	**1ST FLOOR LAUNDRY ROOM PLENUM / TAN HVAC MASTIC OR DUCT**		
	OFF-WHITE CAULK WITH NYLON	NONE DETECTED	SYN 1-3
39. 120802.939	**ATTIC / TAN HVAC MASTIC AND TAPE ON DUCT**		
	A) OFF-WHITE CAULK WITH NYLON	NONE DETECTED	SYN 1-3
	B) SILVER ALUMINIUM PAPER WITH FIBERGLASS	NONE DETECTED	CELL, GL 40-50
40. 120802.940	**ATTIC / TAN HVAC MASTIC AND TAPE ON DUCT**		
	A) OFF-WHITE CAULK WITH NYLON	NONE DETECTED	SYN 1-3
	B) SILVER ALUMINIUM PAPER WITH FIBERGLASS	NONE DETECTED	CELL, GL 40-50
41. 120802.941	**ATTIC / GRAY HVAC MASTIC AND TAPE**		
	A) GRAY CAULK ON ALUMINIUM FOIL	NONE DETECTED	
	B) BLACK STICKY CAULK	NONE DETECTED	CELL, GL <1
42. 120802.942	**ATTIC / GRAY HVAC MASTIC AND TAPE**		
	A) GRAY CAULK ON AL SOIL	NONE DETECTED	
	B) BLACK STICKY CAULK	NONE DETECTED	CELL, GL <1

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43. 120802.943	SOUTHEAST / BLACK WALL VAPOR BARRIER			
	A) BLACK SURFACE TAR AND FELT	NONE DETECTED	CELL 40-50	
	B) BLACK TAR (BOTTOM)	NONE DETECTED		
44. 120802.944	EAST / BLACK WALL VAPOR BARRIER			
	A) BLACK SURFACE TAR AND FELT	NONE DETECTED	CELL 40-50	
	B) BLACK TAR (BOTTOM)	NONE DETECTED		
45. 120802.945	1ST FLOOR KITCHEN WINDOW / EXTERIOR WINDOW GLAZING			
	GRAY PUTTY	CHRYS >1-3		
46. 120802.946	2ND FLOOR WEST / EXTERIOR WINDOW GLAZING			
	GRAY PUTTY	CHRYS >1-3		
47. 120802.947	2ND FLOOR EAST / EXTERIOR WINDOW GLAZING			
	TAN PUTTY	CHRYS >1-3		
48. 120802.948	ROOF PATIO AT STAIRS / EXTERIOR WINDOW GLAZING			
	OFF-WHITE-PAINTED GRAY PUTTY	CHRYS >1-3		
49. 120802.949	2ND FLOOR MEN'S RR / CERAMIC WALL TILE GROUT AND MORTAR			
	A) GREEN CERAMIC TILE	NONE DETECTED		
	B) WHITE GROUT	NONE DETECTED		

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CONSULTING ASSOCIATES
620 CONTRA COSTA BLVD., SUITE 102
PLEASANT HILL, CALIFORNIA 94523

P.O. #: 7526
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50. 120802.950	2ND FLOOR MEN'S RR / CERAMIC WALL TILE GROUT AND MORTAR		
	A) OFF-WHITE/GREEN PAINTS	NONE DETECTED	
	B) WHITE GROUT AND CERAMIC TILE	NONE DETECTED	
51. 120802.951	2ND FLOOR MEN'S RR / MOSAIC FT MORTAR AND GROUT		
	A) GREEN PORCELAIN TILE	NONE DETECTED	
	B) GRAY GROUT	NONE DETECTED	
	C) GRAY MORTAR	NONE DETECTED	
52. 120802.952	2ND FLOOR MEN'S RR / MOSAIC FT MORTAR AND GROUT		
	A) GREEN PORCELAIN TILE	NONE DETECTED	
	B) GRAY GROUT	NONE DETECTED	
	C) GRAY MORTAR	NONE DETECTED	CELL, SYN, HAIR >1-3
53. 120802.953	2ND FLOOR WOMEN'S RR / 4" X 4" CERAMIC WALL TILE GROUT AND MORTAR		
	A) PINK CERAMIC TILE	NONE DETECTED	
	B) WHITE GROUT	NONE DETECTED	
	C) GRAY MORTAR WITH METAL	NONE DETECTED	
	D) WHITE COMPOUND	NONE DETECTED	
54. 120802.954	2ND FLOOR WOMEN'S RR / 4" X 4" CERAMIC WALL TILE GROUT AND MORTAR		
	A) PINK CERAMIC TILE	NONE DETECTED	
	B) WHITE GROUT	NONE DETECTED	
	C) GRAY MORTAR	NONE DETECTED	
	D) WHITE COMPOUND	NONE DETECTED	

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55. 120802.955	2ND FLOOR WOMEN'S RR / BLUE EPOXY FLOOR		
	A) BLUE PAINT	NONE DETECTED	
	B) SAND AND EPOXY	NONE DETECTED	
56. 120802.956	2ND FLOOR WOMEN'S RR / BLUE EPOXY FLOOR		
	A) BLUE PAINT	NONE DETECTED	
	B) SAND AND EPOXY	NONE DETECTED	
57. 120802.957	2ND FLOOR OFFICER'S RR / SHOWER TILE, GROUT AND MORTAR		
	A) GREEN CERAMIC TILE	NONE DETECTED	
	B) WHITE GROUT	NONE DETECTED	
	C) WHITE MORTAR	NONE DETECTED	
	D) WHITE COMPOUND	NONE DETECTED	
	E) BLUE PAINT	NONE DETECTED	CELL >1-2
58. 120802.958	2ND FLOOR OFFICER'S RR / SHOWER TILE, GROUT AND MORTAR		
	A) GREEN CERAMIC TILE	NONE DETECTED	
	B) WHITE GROUT/MORTAR	NONE DETECTED	
	C) WHITE COMPOUND WITH YELLOW GLASS MESH	NONE DETECTED	
59. 120802.959	1ST FLOOR LAUNDRY ROOM / DWS		
	A) OFF-WHITE COMPOUND	NONE DETECTED	
	B) WHITE GREEN BOARD	NONE DETECTED	CELL, GL 15-20

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P.O. #: 7526
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60. 120802.960	**1ST FLOOR BREAK ROOM / DWS**		
	A) GRAY/WHITE PAINTS	NONE DETECTED	
	B) WHITE SHEETROCK	NONE DETECTED	CELL, GL 20-30
61. 120802.961	**1ST FLOOR BREAK ROOM (CEILING) / DWS**		
	A) WHITE COMPOUND TEXTURE	NONE DETECTED	
	B) WHITE PAINT	NONE DETECTED	
	C) WHITE COMPOUND WITH GOLD GLASS MESH	NONE DETECTED	
	D) WHITE SHEETROCK	NONE DETECTED	CELL, GL 10-20
62. 120802.962	**2ND FLOOR HALL / DWS**		
	A) WHITE PAINT	NONE DETECTED	
	B) WHITE COMPOUND, TAPE, COMPOUND	NONE DETECTED	
	C) WHITE SHEETROCK	NONE DETECTED	CELL, GL 10-20
63. 120802.963	**2ND FLOOR WOMEN'S RR / DWS**		
	A) WHITE PAINT	NONE DETECTED	
	B) WHITE COMPOUND WITH YELLOW GLASS MESH	NONE DETECTED	
	C) WHITE/GREEN BOARD	NONE DETECTED	CELL, GL 10-20
64. 120802.964	**2ND FLOOR MEN'S LOCKER ROOM / DWS**		
	A) OFF-WHITE PAINT	NONE DETECTED	
	B) WHITE COMPOUND	NONE DETECTED	
	C) WHITE SHEETROCK	NONE DETECTED	CELL, GL 10-20

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65. 120802.965	**2ND FLOOR OFFICE'S RR / DWS**		
	A) OFF-WHITE PAINT	NONE DETECTED	
	B) WHITE COMPOUND, TAPE, COMPOUND	NONE DETECTED	CELL 10-20
	C) GREEN PAINT	NONE DETECTED	
	D) WHITE FINISHING PLASTER	NONE DETECTED	
	E) WHITE TEXTURE PLASTER	NONE DETECTED	CELL <1
66. 120802.966	**1ST FLOOR OFFICE #1 / PLASTER WALL SYSTEM**		
	A) OFF-WHITE/GREEN PAINTS	NONE DETECTED	
	B) WHITE FINISHING PLASTER	NONE DETECTED	
	C) OFF-WHITE COARSE PLASTER	NONE DETECTED	CELL <1
67. 120802.967	**1ST FLOOR BEHIND ICE MACHINE / PLASTER WALL SYSTEM**		
	A) WHITE/GREEN PAINTS	NONE DETECTED	
	B) WHITE FINISHING PLASTER	NONE DETECTED	
	C) WHITE TEXTURE PLASTER	NONE DETECTED	CELL <1
68. 120802.968	**1ST FLOOR GARAGE ON COLUMN / PLASTER WALL SYSTEM**		
	A) GREEN PAINT	NONE DETECTED	
	B) WHITE COMPOUND #1	NONE DETECTED	
	C) GOLD PAINT	NONE DETECTED	
	D) WHITE FINISHING PLASTER	NONE DETECTED	
	E) GREEN/TAN PAINTS	NONE DETECTED	
	F) WHITE COMPOUND #2	NONE DETECTED	
	G) GRAY/BROWN PAINTS	NONE DETECTED	
	H) WHITE FINISHING PLASTER	NONE DETECTED	
	I) WHITE TEXTURE PLASTER	NONE DETECTED	CELL <1

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69. 120802.969	**1ST FLOOR GARAGE CEILING / PLASTER WALL SYSTEM**		
	A) BEIGE PAINT	NONE DETECTED	
	B) OFF-WHITE FINISHING PLASTER	NONE DETECTED	
	C) WHITE TEXTURE PLASTER	NONE DETECTED	CELL <1
70. 120802.970	**2ND FLOOR HALL / PLASTER WALL SYSTEM**		
	A) OFF-WHITE/TAN PAINT	NONE DETECTED	
	B) WHITE FINISHING PLASTER	NONE DETECTED	
	C) WHITE TEXTURE PLASTER	NONE DETECTED	CELL <1
71. 120802.971	**2ND FLOOR OFFICER'S RM #1 / PLASTER WALL SYSTEM**		
	A) OFF-WHITE/TAN PAINT	NONE DETECTED	
	B) WHITE FINISHING PLASTER	NONE DETECTED	
	C) WHITE TEXTURE PLASTER	NONE DETECTED	CELL <1
72. 120802.972	**2ND FLOOR OFFICER'S RM #2 / PLASTER WALL SYSTEM**		
	A) WHITE/GREEN/TAN PAINTS	NONE DETECTED	
	B) WHITE FINISHING PLASTER	NONE DETECTED	
	C) WHITE TEXTURE PLASTER	NONE DETECTED	CELL <1
73. 120802.973	**TAKEN IN ATTIC / CEILING PLASTER ABOVE 2ND FLOOR DW CEILING**		
	A) GREEN/PINK PAINTS	NONE DETECTED	
	B) WHITE FINISHING PLASTER	NONE DETECTED	
	C) WHITE TEXTURE PLASTER	NONE DETECTED	CELL <1

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P.O. #: 7526
Job #: 3072.2083
Location: CCSF-ESEA FIRE STATION, FIREHOUSE #1(
DEMO SURVEY

Report Number: ZH0301
Date: AUGUST 9, 2012
Analyst: OLGA KIST
Date Completed: AUGUST 9, 2012
Sample Collector: TYLER BELAIR
Collection Date: AUGUST 2, 2012

9 Sample(s) containing Asbestos

95 Sample(s) Analyzed
95 Sample(s) Received 8/3/12 11:19

Sample #	Location / Description	ASBESTOS TYPE AND RANGE % OR NONE DETECTED	NONASBESTOS Fibers (%) Balance on File
74. 120802.974	ATTIC / CEILING PLASTER ABOVE 2ND FLOOR DW CEILING		
	A) GREEN/PINK PAINTS	NONE DETECTED	
	B) WHITE FINISHING PLASTER	NONE DETECTED	
	C) WHITE TEXTURE PLASTER	NONE DETECTED	CELL <1
75. 120802.975	ABOVE STAIRS / FLAT ROLLED TAR AND GRAVEL ROOF		
	A) BLACK GRAVEL AND GUMMY TAR	NONE DETECTED	
	B) GUMMY TAR AND FELT/NYLON/PAPER AND GLASS FELTS	NONE DETECTED	SYN, CELL, GL 15-20
	C) TAN INSULATION	NONE DETECTED	CELL 60-70
76. 120802.976	NORTHEAST ROOF / FLAT ROLLED TAR AND GRAVEL ROOF		
	A) BLACK TAR AND SAND SURFACE	NONE DETECTED	
	B) TAR AND GLASS FELTS	NONE DETECTED	GL 15-20
	C) TAN INSULATION	NONE DETECTED	CELL 60-70
77. 120802.977	NORTH OF ROOF PATIO / FLAT ROLLED TAR AND GRAVEL ROOF		
	A) BLACK SURFACE TAR	NONE DETECTED	
	B) TAR AND GRAVEL	NONE DETECTED	
	C) TAR AND GLASS FELTS	NONE DETECTED	GL 15-20
	D) TAN INSULATION	NONE DETECTED	CELL 60-70

CHRYS: Chrysotile
AMOS: Amosite
CROC: Crocidolite
TREM: Tremolite/Actinolite
ANTH: Anthophyllite

CELL: Cellulose
GL: Fiberglass/Mineral Wool
SYN: Synthetic
CARB: Carbonates
SILI: Mixed Silicates

POLY: Polyethylene
FTALC: Fibrous Talc
FGYP: Fibrous Gypsum
FELD: Feldspar
CASI: Calcium Silicates

Bulk samples analyzed in accordance with "Method for the Determination of Asbestos in Bulk Building Materials" EPA/600/R-93/116, July 1993. The detection limit is 1%. Quantitation asbestos is by calibrated visual estimation. Analytical Labs San Francisco, Inc. (ALSF) is recognized under the National Laboratory Accreditation Program for satisfactory compliance criteria established in Title 15, Part 7 code of Federal Regulations and accredited for bulk asbestos fiber analysis (NVLAP lab code: 101909-0). Asbestos fibers less than 0.2 microns cc not be resolved by light microscope. This report must not be reproduced except in full, without the written approval of ALSF and pertains only to the samples analyzed.

AUTHORIZED SIGNATURE _____ DATE 8/10/12

467 Potrero Avenue, San Francisco, CA 94110 (415) 552-4595 FAX 552-0730

ALSF ANALYTICAL LABS SAN FRANCISCO INC.

POLARIZED LIGHT MICROSCOPY ANALYSIS FOR ASBESTOS CONTENT

Client: MILLENNIUM ENVIRONMENTAL
CONSULTING ASSOCIATES
620 CONTRA COSTA BLVD., SUITE 102
PLEASANT HILL, CALIFORNIA 94523

P.O. #: 7526
Job #: 3072.2083
Location: CCSF-ESEA FIRE STATION, FIREHOUSE #16
DEMO SURVEY

Report Number: ZH0301
Date: AUGUST 9, 2012
Analyst: OLGA KIST
Date Completed: AUGUST 9, 2012
Sample Collector: TYLER BELAIR
Collection Date: AUGUST 2, 2012

9 Sample(s) containing Asbestos

95 Sample(s) Analyzed
95 Sample(s) Received 8/3/12 11:19

Sample #	Location / Description	ASBESTOS TYPE AND RANGE % OI NONE DETECTED	NONASBESTOS Fibers (%) Balance on File
78. 120802.978	**ROOF PATIO / FLAT ROLLED TAR AND GRAVEL ROOF**		
	A) BLACK SURFACE TAR	NONE DETECTED	
	B) TAR AND NYLON FELT	NONE DETECTED	SYN 20-30
	C) TAR AND GLASS FELTS (4)	NONE DETECTED	GL 10-20
	D) TAN INSULATION	NONE DETECTED	CELL 60-70
	E) TAR AND WOOD	NONE DETECTED	CELL 1-3
79. 120802.979	**EAST AT ROOF TRANSITION / COMPOSITION ROOF**		
	A) BROWN GRAVEL AND TAR (2)	NONE DETECTED	
	B) TAR AND GLASS FELTS WITH CLEAR PLASTIC	NONE DETECTED	GL 10-20
	C) BLACK FELT AND TAR	NONE DETECTED	CELL 50-60
80. 120802.980	**WEST AT PEAK / COMPOSITION ROOF**		
	A) BROWN GRAVEL AND TAR (2) AND GLASS FELTS (2)	NONE DETECTED	GL 10-20
	B) BLACK FELT AND TAR WITH WOOD FIBERS	NONE DETECTED	CELL 50-60
81. 120802.981	**BLACK ROOF PENETRATION MASTIC**		
	BLACK SURFACE TAR WITH WOOD	NONE DETECTED	CELL 10-15
82. 120802.982	**BLACK ROOF PENETRATION MASTIC**		
	BLACK SURFACE TAR	NONE DETECTED	CELL 5-15
83. 120802.983	**NORTH OF PATIO / GRAY/BLACK PENETRATION MASTIC ON ROOF**		
	BROWN-BLACK SURFACE TAR	NONE DETECTED	CELL 5-10

CHRYS: Chrysotile
AMOS: Amosite
CROC: Crocidolite
TREM: Tremolite/Actinolite
ANTH: Anthophyllite

CELL: Cellulose
GL: Fiberglass/Mineral Wool
SYN: Synthetic
CARB: Carbonates
SILI: Mixed Silicates

POLY: Polyethylene
FTALC: Fibrous Talc
FGYP: Fibrous Gypsum
FELD: Feldspar
CASI: Calcium Silicates

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POLARIZED LIGHT MICROSCOPY ANALYSIS FOR ASBESTOS CONTENT

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CONSULTING ASSOCIATES
620 CONTRA COSTA BLVD., SUITE 102
PLEASANT HILL, CALIFORNIA 94523

P.O. #: 7526
Job #: 3072.2083
Location: CCSF-ESEA FIRE STATION, FIREHOUSE #16
DEMO SURVEY

Report Number: ZH0301
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Collection Date: AUGUST 2, 2012

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84. 120802.984	**AT COMPOSITION ROOF / GRAY/BLACK PENETRATION MASTIC ON ROOF**		
	BROWN-BLACK SURFACE TAR	NONE DETECTED	CELL 5-15
85. 120802.985	**EAST FLAT ROOF / HVAC TAPE**		
	BLACK CAULK WITH GRAY PAINTED FOIL	NONE DETECTED	
86. 120802.986	**NORTH OF PATIO ON FLAT ROOF / HVAC TAPE**		
	BLACK CAULK WITH BEIGE PAINTED ALUMINUM FOIL	NONE DETECTED	
87. 120802.987	**WEST SKYLIGHT / WHITE SKYLIGHT MASTIC**		
	WHITE RUBBER CAULK	NONE DETECTED	
88. 120802.988	**EAST SKYLIGHT / WHITE SKYLIGHT MASTIC**		
	WHITE RUBBER CAULK	NONE DETECTED	
89. 120802.989	**PATIO ROOF / TAN FLASHING MASTIC**		
	A) GOLD RUBBER CAULK	NONE DETECTED	CASI <1
	B) SILVER PAINT WITH TAR ON SURFACE IN GROOVES	NONE DETECTED	CELL, WEB, INSECT FIBERS <1-2
90. 120802.990	**NORTH/FRONT OF COMPOSITION ROOF / TAN FLASHING MASTIC**		
	A) GOLD RUBBER CAULK	NONE DETECTED	CASI <1
	B) GRAY CAULK IN GROOVES AND BOTTOM	NONE DETECTED	

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AMOS: Amosite
CROC: Crocidolite
TREM: Tremolite/Actinolite
ANTH: Anthophyllite

CELL: Cellulose
GL: Fiberglass/Mineral Wool
SYN: Synthetic
CARB: Carbonates
SILI: Mixed Silicates

POLY: Polyethylene
FTALC: Fibrous Talc
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FELD: Feldspar
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ALSF ANALYTICAL LABS SAN FRANCISCO INC.

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Client: MILLENNIUM ENVIRONMENTAL
CONSULTING ASSOCIATES
620 CONTRA COSTA BLVD., SUITE 102
PLEASANT HILL, CALIFORNIA 94523

P.O. #: 7526
Job #: 3072.2083
Location: CCSF-ESEA FIRE STATION, FIREHOUSE #16
DEMO SURVEY

Report Number: ZH0301
Date: AUGUST 9, 2012
Analyst: OLGA KIST
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Sample #	Location / Description	ASBESTOS TYPE AND RANGE % OF NONE DETECTED	NONASBESTOS Fibers (%) Balance on File
91. 120802.991	**NORTH HOSE TOWER / EXTERIOR STUCCO/CONCRETE SKIM COAT**		
	A) YELLOW PAINT	NONE DETECTED	
	B) PINK COARSE FINISHING PLASTER	NONE DETECTED	CELL <1
	C) OLD YELLOW PAINT WITH TAN ACM SEALANT	**CHRYS 5-10**	
92. 120802.992	**NORTH EXTERIOR WALL / EXTERIOR STUCCO/CONCRETE SKIM COAT**		
	A) YELLOW/PINK PAINTS	NONE DETECTED	
	B) PINK COARSE PLASTER	NONE DETECTED	
93. 120802.993	**EXTERIOR BBQ SHED PAINT (CREAM)**		
	WHITE/PINK PAINTS	NONE DETECTED	
94. 120802.994	**EXTERIOR SOUTH PAINT**		
	YELLOW/PINK PAINTS	NONE DETECTED	
95. 120802.995	**RETAINING WALL PAINT / EXTERIOR SOUTH YARD**		
	WHITE/PINK PAINTS	NONE DETECTED	DIATOMS <1
080612	LABORATORY BLANK (1866 GLASS FIBERS)	NONE DETECTED	

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AMOS: Amosite
CROC: Crocidolite
TREM: Tremolite/Actinolite
ANTH: Anthophyllite

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GL: Fiberglass/Mineral Wool
SYN: Synthetic
CARB: Carbonates
SILI: Mixed Silicates

POLY: Polyethylene
FTALC: Fibrous Talc
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AUTHORIZED SIGNATURE _____ DATE 8/10/12

467 Potrero Avenue, San Francisco, CA 94110 (415) 552-4595 FAX 552-0730

ZH0301

ALSF ANALYTICAL LABS SAN FRANCISCO INC.

REQUEST FOR PLM/BULK ASBESTOS ANALYSIS - CHAIN OF CUSTODY ALSF LOG#:

Our policy is to protect the confidentiality and proprietary rights of our clients to the best of our ability.

The information provided in this box gives us permission to release the results by telephone, email or by fax to the party or parties listed. It is the obligation of the client to ensure that these channels of communication are secure and private.

MAIL REPORT TO:

CLIENT: Millennium Consulting

620 Contra Costa Blvd., Ste 102

Pleasant Hill, CA ZIP: 94523

P.O#: 7526 JOB #: 3072.2083

JOB SITE: CCSF-ESER Fire Station Firehouse #16 Demo Survey

CONTACT:

PHONE: (925) 808-6700

FAX: (925) 808-6708

PAGER:

EMAIL: frontdesk@mecaenviro.com, lgosselin@mecaenviro.com, mnoel@mecaenviro.com

RESULTS NEED BY: / /

Tyler B Vdibals 8/9 12:00 OK.

(circle) hr. RUSH 24hr 48hr (72 hr)

(circle) (STANDARD PLM) / PLM WITH POINT COUNT

SAMPLE NO.	ALSF NO.	CLIENT'S SAMPLE LOCATION/ DESCRIPTION
120802.901	H0301-1	Black Sheet Flooring w/yellow mastic – 1st Floor Kitchen
.902	2	" "
.903	3	Covebase Mastic associated with 6" Tan CB – 1st Floor office
.904	4	" " – 1st Floor TV Room
.905	5	2"x2" Ceramic FT mortar – 1st Floor RR#1
.906	6	" "
.907	7	2"x2" Ceramic FT Grout – 1st Floor RR#1
.908	8	" "
.909	9	4"x4" Ceramic WT Grout – 1st Floor RR#1
.910	10	" "

SAMPLED BY: Tyler Belair DATE: 8/2/2012 TIME: A.M.

Relinquished by: [signature]

Date/Time: 8/3/2012

Relinquished by:

Date/Time:

Received by lab: [signature]

Date/Time: 8/3/12 11:19am

Analyzed by: [signature]

Date/Time: 8/2-9/12

A L S F

ZH0301-

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620 Contra Costa Blvd., Ste 102

Pleasant Hill, CA ZIP: 94523

P.O #: JOB #:

JOB SITE:

CONTACT:

PHONE: (925) 808-6700 **RESULTS NEED BY:**

FAX: (925) 808-6708 / /

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EMAIL: frontdesk@mecaenviro.com, lgosselin@mecaenviro.com, mnoel@mecaenviro.com

(circle)

hr. RUSH 24hr 48hr

(circle)

STANDARD PLM / PLM WITH POINT COUNT

SAMPLE NO.	ALSF NO.	CLIENT'S SAMPLE LOCATION/ DESCRIPTION
120802.911	ZH0301-11	Sauna Tile Grout
.912	12	" "
.913	13	Sauna Tile Mortar
.914	14	" "
.915	15	Sauna Vapor Barrier
.916	16	" "
.917	17	16" Transite Pipe - Basement Mechanical Room
.918	18	" "
.919	19	Carpet Mastic (yellow) - 1st Floor Gym Area
.920	20	" "

SAMPLED BY: DATE: TIME:

Relinquished by:

Date/Time:

Relinquished by:

Date/Time:

Received by lab:

Date/Time:

Analyzed by:

Date/Time:

A L S F

467 Potrero Avenue, San Francisco, CA 94110 (415) 552-4595 FAX 552-0730

ZH0301e

ALSF ANALYTICAL LABS SAN FRANCISCO INC.

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(circle)

hr. RUSH 24hr 48hr

(circle)

STANDARD PLM / PLM WITH POINT COUNT

SAMPLE NO.	ALSF NO.	CLIENT'S SAMPLE LOCATION/ DESCRIPTION
120802.922	10301-21	4"x4" Ceramic WT Mortar - 1st Floor RR #1
.922	22	" " 1st Floor RR #1
.923	23	Red Sheet Flooring w/ Backing and yellow mastic (Top) Brown Sheet Flooring w/ Backing and Black mastic (Bottom) → 1st Floor Stairs
.924	24	" " 1st Floor - Stairs
.925	25	New TSI on Ceiling pipes & hangers. 1st Floor Garage
.926	26	" " - 1st Floor TV Room
.927	27	TSI (6" pipe) - Basement Mechanical Room
.928	28	" "
.929	29	Black/Red sheet Flooring w/ Backing & yellow Mastic - 1st Floor Break Room
.930	30	" "

SAMPLED BY: DATE: TIME:

Relinquished by: Received by lab: A

Date/Time: Date/Time: L

Relinquished by: Analyzed by: S

Date/Time: Date/Time: F

467 Potrero Avenue, San Francisco, CA 94110 (415) 552-4595 FAX 552-0730

ZH0501e

ALSF ANALYTICAL LABS SAN FRANCISCO INC.

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(circle)

hr. RUSH 24hr 48hr

(circle)

STANDARD PLM / PLM WITH POINT COUNT

SAMPLE NO.	ALSF NO.	CLIENT'S SAMPLE LOCATION/ DESCRIPTION
120802.937	H0301-31	Black/Red sheet Flooring w/Backing & yellow mastic - Hall 2nd Floor
.932	32	Cove base Mastic (yellow) associated w/ 4" Brown CB - 2nd Floor Hall
.933	33	" "
.934	34	Brown Battle ship w/ Black Backing - 2nd Floor stairs to Roof
.935	35	" "
.936	36	Black sheet Flooring w/Backing - stair landing @ Roof
.937	37	" "
.938	38	Tan HVAC Mastic on Duct - 1st Floor laundry Rm plenum
.939	39	Tan HVAC Mastic & Tape on Duct - Attic
.940	40	" "

SAMPLED BY: DATE: TIME:

Relinquished by: Received by lab:

Date/Time: Date/Time:

Relinquished by: Analyzed by:

Date/Time: Date/Time:

ALSF

467 Potrero Avenue, San Francisco, CA 94110 (415) 552-4595 FAX 552-0730

Z10501-

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(circle)

hr. RUSH 24hr 48hr

(circle)

STANDARD PLM / PLM WITH POINT COUNT

SAMPLE NO.	ALSF NO.	CLIENT'S SAMPLE LOCATION/ DESCRIPTION
120802.941	10501-41	Gray HVAC Mastic & Tape - Attic
.942	42	" "
.943	43	Black Wall Vapor Barrier (SE)
.944	44	" " (E)
.945	45	Exterior Window Glazing - 1st Floor kitchen Window
.946	46	" " - 2nd Floor West
.947	47	" " - 2nd Floor East
.948	48	" " - Roof Patio @ Stairs
.949	49	Ceramic Wall Tile Grout & Mortar - 2nd Floor Mens RR
.950	TD	" "

SAMPLED BY: DATE: TIME:

Relinquished by:

Date/Time:

Relinquished by:

Date/Time:

Received by lab:

Date/Time:

Analyzed by:

Date/Time:

ALSF

467 Potrero Avenue, San Francisco, CA 94110 (415) 552-4595 FAX 552-0730

ZH0501e

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EMAIL: frontdesk@mecaenviro.com, lgosselin@mecaenviro.com, mnoel@mecaenviro.com

(circle)

hr. RUSH 24hr 48hr

(circle)

STANDARD PLM / PLM WITH POINT COUNT

SAMPLE NO.	ALSF NO.	CLIENT'S SAMPLE LOCATION/ DESCRIPTION
120802.952	0501-52	Mosaic FT Mortar & Grout - 2nd Floor Mens RR
.952	52	" "
.953	53	4"x4" Ceramic Wall Tile Grout & Mortar - 2nd Floor Womens RR
.954	54	" "
.955	55	Blue Epoxy Floor - 2nd Floor Women's RR
.956	56	" "
.957	57	Shower tile Grout & Mortar - 2nd Floor Offices RR
.958	58	" "
.959	59	DWS — 1st Floor laundry Room
.960	60	DWS - 1st Floor Break Room

SAMPLED BY: DATE: TIME:

Relinquished by:

Date/Time:

Relinquished by:

Date/Time:

Received by lab:

Date/Time:

Analyzed by:

Date/Time:

ALSF

ZH0301e

ALSF ANALYTICAL LABS SAN FRANCISCO INC.

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EMAIL: frontdesk@mecaenviro.com, lgosselin@mecaenviro.com, mnoel@mecaenviro.com

(circle)

hr. RUSH 24hr 48hr

(circle)

STANDARD PLM / PLM WITH POINT COUNT

SAMPLE NO.	ALSF NO.	CLIENT'S SAMPLE LOCATION/ DESCRIPTION
.961	ZH0301-61	DWS (Ceiling) - 1st Floor Break Room
.962	62	DWS - 2nd Floor Hall
.963	63	DWS - 2nd Floor Women's RR
.964	64	DWS - 2nd Floor Men's locker Room
.965	65	DWS - 2nd Floor Officer's RR
.966	66	Plaster Wall System - 1st Floor Office #1
.967	67	" " - 1st Floor Behind Ice Machine
.968	68	" " - 1st Floor Garage on Column
.969	69	" " - 1st Floor Garage Ceiling
.970	70	" " - 2nd Floor Hall

SAMPLED BY: **DATE:** **TIME:**

Relinquished by:

Date/Time:

Relinquished by:

Date/Time:

Received by lab:

Date/Time:

Analyzed by:

Date/Time:

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ALSF ANALYTICAL LABS SAN FRANCISCO INC.

Z10301-

REQUEST FOR PLM/BULK ASBESTOS ANALYSIS - CHAIN OF CUSTODY ALSF LOG#:

Our policy is to protect the confidentiality and proprietary rights of our clients to the best of our ability. The information provided in this box gives us permission to release these results by telephone, email or by fax to the party or parties listed. It is the obligation of the client to ensure that these channels of communication are secure and private.

MAIL REPORT TO:

CLIENT: Millennium Consulting

620 Contra Costa Blvd., Ste 102

Pleasant Hill, CA ZIP: 94523

P.O #: JOB #:

JOB SITE:

CONTACT:

PHONE: (925) 808-6700 **RESULTS NEED BY:**

FAX: (925) 808-6708 / /

PAGER:

EMAIL: frontdesk@mecaenviro.com, lgosselin@mecaenviro.com, mnoel@mecaenviro.com

(circle)

hr. RUSH 24hr 48hr

(circle)

STANDARD PLM / PLM WITH POINT COUNT

SAMPLE NO.	ALSF NO.	CLIENTS SAMPLE LOCATION/ DESCRIPTION
120802.971	10301-7	Plaster Wall System - 2nd Floor Officer's Rm #1
.972	72	" " - 2nd Floor Officer's Rm #2
.973	73	Ceiling Plaster above 2nd Floor DW ceiling - ~~2nd Floor~~ - Taken in Attic
.974	74	" "
.975	75	Flat Rolled Tar & Gravel Roof - above stairs
.976	76	" " - NE Roof
.977	77	" " - N of Roof Patio
.978	78	" " - Roof Patio
.979	79	Composition Roof - East @ Roof Transition
.980	80	" " - West @ peak

SAMPLED BY: DATE: TIME:

Relinquished by:

Date/Time:

Relinquished by:

Date/Time:

Received by lab:

Date/Time:

Analyzed by:

Date/Time:

A L S F

ALSF PLM/Bulk ZH0301-

[redacted]

[redacted]

[redacted]

Additional Pages of the Chain of Custody are only necessary if needed for additional sample information

Sample #	AlSF No.	Sample Description	[redacted]	[redacted]
120802.991	ZH0301-91	Exterior Stucco/Concrete	Skim Coat -	North Hose Tower
.992	92	"	" -	Nort Exterior Wall
.993	93	Exterior BBQ Shed paint (Cream)		
.994	94	Exterior South Paint		
.995	95	Exterior South yard	- Retaining	Wall Paint

***Comments/Special Instructions:**

Page 10 of 10 pages

ALSF ANALYTICAL LABS SAN FRANCISCO INC.

ZH0301-

REQUEST FOR PLM/BULK ASBESTOS ANALYSIS - CHAIN OF CUSTODY ALSF LOG#:

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MAIL REPORT TO:

CLIENT: Millennium Consulting

620 Contra Costa Blvd., Ste 102

Pleasant Hill, CA ZIP: 94523

P.O #: JOB #:

JOB SITE:

CONTACT:

PHONE: (925) 808-6700 **RESULTS NEED BY:**

FAX: (925) 808-6708 / /

PAGER:

EMAIL: frontdesk@mecaenviro.com, lgosselin@mecaenviro.com, mnoel@mecaenviro.com

(circle)

hr. RUSH 24hr 48hr

(circle)

STANDARD PLM / PLM WITH POINT COUNT

SAMPLE NO.	ALSF NO.	CLIENT'S SAMPLE LOCATION/ DESCRIPTION
120802.981	81	Black Roof Penetration Mastic
.982	82	" "
.983	83	Gray/Black Penetration Mastic on Roof - North of Patio
.984	84	" " @ Comp Roof
.985	85	HVAC Tape - East flat Roof
.986	86	HVAC Tape - North of Patio on flat Roof
.987	87	White ~~Mastic~~ Skylight mastic - West Skylight
.988	88	" " - East Skylight
.989	89	Tan Flashing Mastic - Patio Roof
.990	90	" " - North/Front of Comp Roof

SAMPLED BY: DATE: TIME:

Relinquished by: Received by lab: A

Date/Time: Date/Time: L

Relinquished by: Analyzed by: S

Date/Time: Date/Time: F

467 Potrero Avenue, San Francisco, CA 94110 (415) 552-4595 FAX 552-0730

ALSF PLM/Bulk ZH0301-

[redacted]

[redacted]

223[redacted] STE 230
SAN L[redacted]77
PH[redacted]
[redacted]

Additional Pages of the Chain of Custody are only necessary if needed for additional sample information

Sample #	AISF No.	Sample Description	[redacted]	[redacted]
120802.991	ZH0301-91	Exterior Stucco/Concrete	Skim Coat -	North Hose Tower
.992	92	"	" -	North Exterior Wall
.993	93	Exterior BBQ Shed paint (Cream)		
.994	94	Exterior South Paint		
.995	95	Exterior South yard	- Retaining	Wall Paint

***Comments/Special Instructions:**

Page 10 of 10 pages

Controlled Document – Asbestos COC – R2 – 1/12/2010

EXHIBIT 4

SAN FRANCISCO ARTS COMMISSION
CIVIC DESIGN REVIEW COMMITTEE

Monday, January 13, 2014
3:00 p.m.
25 Van Ness Avenue, Suite 70

Agenda

1. **Roll Call**

2. **ESER 1 Neighborhood Fire Station #16: Phase 3**
   Action
   Approximately 20 minutes
   This project was previously reviewed on the following dates: 10/15/12, 11/19/12, 1/14/13, 8/19/13.
   Gabriella Judd Cirelli, Project Manager, DPW Design & Construction
   Paul de Freitas, Project Architect, DPW Design & Construction

   Explanatory documents: Request for Review Form, Presentation

   Discussion and possible motion to approve Phase 3 of the ESER 1 Neighborhood Fire Station #16.

PRIOR on October 15, 2012

1. **ESER 1, Fire Station #16: Informational Presentation**
   Gabriella Judd Cirelli, Project Manager, Department of Public Works, introduced the project and explained that the original building was constructed in the 1930s and was dramatically renovated in the 1950s. The cost of seismic upgrade was greater than that of a new building. The historic evaluation found that the character of the building was not significant as a historic resource. She presented the site context, which is residential, and the concept drawings for the layout and functions.

   Commissioner Smith asked about the community process.

   Ms. Cirelli explained that they are doing early outreach to gather information on what is important to the community.

   Commissioner Borden commented that new buildings are more modern. What you build today should be of today and no be false historicism.

   Commissioner Chow recommended going to the community with design concepts instead of choices. Commissioner Chow also recommended finding a way to get more outdoor space.

Prior on November 19, 2012

1.

ESER 1, Fire Station #16: Phase 1
Action
Approximately 20 minute
This project was previously reviewed on the following date: 10/22/12
Andrew Maloney, Architect, Department of Public Works
Gabriella Judd Cirelli, Project Manager, Department of Public Works

Explanatory document: ESER 1, Fire Station #16: Phase 1 Presentation

Discussion and possible motion to approve Phase 1 of the ESER 1, Fire Station #16.

PRIOR on January 13, 2013

1.

ESER 1, Fire Station #16: Phase 1
Gabriella Judd Cirelli, Project Manager, Department of Public Works, gave an overview of the bond project and briefly reviewed the previous designs for Fire Station 16. She explained that the Fire Department has seen the new direction for the building and is in support of a more contemporary design. She introduced Paul De Freitas, DPW BDC, Architectural Associate.

Mr. De Freitas briefly explained the siting and location for the fire station. He presented images of the surrounding buildings and presented the most recent iteration of the design. The living areas above theapparatus bay doors will have large glass windows to provide natural light. There will also be a large graphic above the door to identify the building as part of the Fire Department. The scale and massing of the station intend for it to fit into the neighborhood yet still have a warm, civic presence.

Commissioner Chow commented that the glass should turn around the edge of the building more cleanly.He also added that the clear glass and spandrel glass will look different and this should be considered in the design. On the back of the building, there are long windows that should be reworked or removed. He also added that the trash enclosure should be less prominent than the entrance.

Commissioner Keehn asked that the materials, including the types of glass and trim colors, are carefully considered.

Commissioner Stryker commented that the tree pits could be longer to improve the health of the trees.

Motion to approve Phase 1 of the ESER 1, Fire Station #16: Commissioner Chow
Vote: Unanimously approved.

PRIOR on August 19, 2013

1.

2. **Fire Station #16: Phase 2**
Gabriella Judd Cirelli, Project Manager, Department of Public Works ("DPW") Building Design and Construction, and Paul de Freitas, Project Architect, DPW Building Design and Construction, presented renderings of Fire Station #16. Mr. de Frietas said that there had been a significant amount of community involvement and feedback since the last presentation to this Committee. As a response to neighborhood feedback, the project team created renderings that would reduce the visual presence of the glass windows on the second floor to make it more visually appealing. He added that the window treatment reduces the massing of the glass and adds texture to the design. The entry door will likely be clear glass, but the client prefers frosted or opaque glass illuminated from behind. He stated that the building would have a blue roof, similar to what is seen in Seattle and New York. He said it was a great alternative to meeting certain criteria, other than having a green roof. Most of the renderings are consistent with what was presented in Phase 1. Mr. de Freitas stated that the design took its inspiration from the wooden ladders used by the firefighters as part of their daily work. Mr. de Frietas noted that the construction budget would increase moving forward. The project team showed sample construction materials to the Committee. The use of stone with pre-mitered corners was well-received by the community and valued for giving warmth to the building. The Commissioners acknowledged their positive impression of the improvement in design since the last presentation, although Commissioner Smith expressed reservations about the corner of the glazed firewall and thought it needed further work.

There was no public comment, and the motion was approved unanimously as follows.

Motion to approve Phase 2 of Fire Station #16 subject to design modifications of the glazed firewall at the northeast corner.
Motion: Commissioner Stryker
Second: Commissioner Ordeñana

EXHIBIT 5

STATE WATER RESOURCES CONTROL BOARD

GEOTRACKER

CASE SUMMARY

REPORT DATE
1/2/1965

HAZARDOUS MATERIAL INCIDENT REPORT FILED WITH OES?

I. REPORTED BY -
UNKNOWN

CREATED BY
UNKNOWN

II. RESPONSIBLE PARTY -
UNKNOWN

III. SITE LOCATION

FACILITY NAME
SFFD #16

FACILITY ID

FACILITY ADDRESS
2251 Greenwich Street
San Francisco, CA 94123
SAN FRANCISCO COUNTY

ORIENTATION OF SITE TO STREET

CROSS STREET

V. SUBSTANCES RELEASED / CONTAMINANT(S) OF CONCERN
GASOLINE

VI. DISCOVERY/ABATEMENT

DATE DISCHARGE BEGAN

DATE DISCOVERED	HOW DISCOVERED	DESCRIPTION
9/3/1987		
DATE STOPPED	STOP METHOD	DESCRIPTION

VII. SOURCE/CAUSE

SOURCE OF DISCHARGE

CAUSE OF DISCHARGE

DISCHARGE DESCRIPTION

VIII. CASE TYPE

CASE TYPE
Other Groundwater (uses other than drinking water)

IX. REMEDIAL ACTION

REMEDIAL ACTION	BEGIN DATE	END DATE	DESCRIPTION
NA	1/1/1965		

X. GENERAL COMMENTS

XI. CERTIFICATION

I HEREBY CERTIFY THAT THE INFORMATION REPORTED HEREIN IS TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE.

XII. REGULATORY USE ONLY

LOCAL AGENCY CASE NUMBER
10169

REGIONAL BOARD CASE NUMBER
38-0285

LOCAL AGENCY

CONTACT NAME	INITIALS	ORGANIZATION NAME	EMAIL ADDRESS
STEPHANIE CUSHING	SC	SAN FRANCISCO COUNTY LOP	stephanie.cushing@sfdph.org

ADDRESS
1390 MARKET STREET #210
SAN FRANCISCO, CA 94102

CONTACT DESCRIPTION

PHONE TYPE	PHONE NUMBER	EXTENSION
BUSINESS	(415)-252-3926	

REGIONAL BOARD

CONTACT NAME	INITIALS	ORGANIZATION NAME	EMAIL ADDRESS
VIC PAL	VP	SAN FRANCISCO BAY RWQCB (REGION 2)	vpal@waterboards.ca.gov

ADDRESS
1515 CLAY STREET, SUITE 1400
OAKLAND, CA 94612

CONTACT DESCRIPTION

PHONE TYPE	PHONE NUMBER	EXTENSION
office	(510)-622-2403	

EXHIBIT 6

SAN FRANCISCO
PLANNING DEPARTMENT

CEQA Categorical Exemption Determination

PROPERTY INFORMATION/PROJECT DESCRIPTION

Project Address		Block/Lot(s)	
2251 Greenwich Street		0515/031	
Case No.	Permit No.	Plans Dated	
2012.1443E	N/A	09/10/12	
☐ Addition/ Alteration	☑ Demolition (requires HRER if over 50 years old)	☑ New Construction	☐ Project Modification (GO TO STEP 7)

Project description for Planning Department approval.

Demolition and new construction of Fire Station #13. The proposed project includes demolition of the existing 2-story, 10,272 square foot (sf) fire station built in 1938 and construction of a new 2-story, 10,398 sf fire station on the same lot with three programmed areas: (1) Apparatus bay and support, (2) firefighter operations, and (3)living quarters. The project also includes replacement of the roof top generator, removal of one underground storage tank and replacement of a second underground storage tank.

STEP 1: EXEMPTION CLASS

TO BE COMPLETED BY PROJECT PLANNER

Note: If neither class applies, an *Environmental Evaluation Application* is required.*	
☐	**Class 1 – Existing Facilities.** Interior and exterior alterations; additions under 10,000 sq. ft.; change of use under 10,000 sq. ft. if principally permitted or with a CU.
☐	**Class 3 – New Construction.** Up to three (3) new single-family residences or six (6) dwelling units in one building; commercial/office structures; utility extensions.
☑	Class 2 Replacement & reconstruction of existing structures/facilities. New structure located on the same site as structure replaced with substantially the same purpose & capacity.

STEP 2: CEQA IMPACTS

TO BE COMPLETED BY PROJECT PLANNER

If any box is checked below, an *Environmental Evaluation Application* is required.	
☐	**Transportation:** Does the project create six (6) or more net new parking spaces or residential units? Does the project have the potential to adversely affect transit, pedestrian and/or bicycle safety (hazards) or the adequacy of nearby transit, pedestrian and/or bicycle facilities?
☐	**Air Quality:** Would the project add new sensitive receptors (specifically, schools, day care facilities, hospitals, residential dwellings, and senior-care facilities) within an air pollution hot spot? *(refer to EP _ArcMap > CEQA Catex Determination Layers > Air Pollution Hot Spots)*
☑	**Hazardous Materials:** If the project site is located on the Maher map or is suspected of containing hazardous materials (based on a previous use such as gas station, auto repair, dry cleaners, or heavy manufacturing, or a site with underground storage tanks): Would the project involve 50 cubic yards or more of soil disturbance - or a change of use from industrial to residential? If yes, this box must be checked and the project applicant must submit an Environmental Application with a Phase I Environmental Site Assessment. *Exceptions: do not check box if the applicant presents documentation of enrollment in the San Francisco Department of Public Health (DPH) Maher program, a DPH waiver from the Maher program, or other documentation from Environmental Planning staff that hazardous material effects would be less than significant (refer to EP_ArcMap > Maher layer).*

☑	**Soil Disturbance/Modification:** Would the project result in soil disturbance/modification greater than two (2) feet below grade in an archeological sensitive area or eight (8) feet in a non-archeological sensitive area? *(refer to EP_ArcMap > CEQA Catex Determination Layers > Archeological Sensitive Area)*
☐	**Noise:** Does the project include new noise-sensitive receptors (schools, day care facilities, hospitals, residential dwellings, and senior-care facilities) fronting roadways located in the noise mitigation area? *(refer to EP_ArcMap > CEQA Catex Determination Layers > Noise Mitigation Area)*
☐	**Subdivision/Lot Line Adjustment:** Does the project site involve a subdivision or lot line adjustment on a lot with a slope average of 20% or more? *(refer to EP_ArcMap > CEQA Catex Determination Layers > Topography)*
☐	**Slope = or > 20%: :** Does the project involve excavation of 50 cubic yards of soil or more, square footage expansion greater than 1,000 sq. ft., shoring, underpinning, retaining wall work, or grading on a lot with a slope average of 20% or more? *Exceptions: do not check box for work performed on a previously developed portion of site, stairs, patio, deck, or fence work. (refer to EP_ArcMap > CEQA Catex Determination Layers > Topography)* **If box is checked, a geotechnical report is required and a Certificate or higher level CEQA document required**
☐	**Seismic: Landslide Zone:** Does the project involve excavation of 50 cubic yards of soil or more, square footage expansion greater than 1,000 sq. ft., shoring, underpinning, retaining wall work, grading –including excavation and fill on a landslide zone – as identified in the San Francisco General Plan? *Exceptions: do not check box for work performed on a previously developed portion of the site, stairs, patio, deck, or fence work. (refer to EP_ArcMap > CEQA Catex Determination Layers > Seismic Hazard Zones)* **If box is checked, a geotechnical report is required and a Certificate or higher level CEQA document required**
☐	**Seismic: Liquefaction Zone:** Does the project involve excavation of 50 cubic yards of soil or more, square footage expansion greater than 1000 sq ft, shoring, underpinning, retaining wall work, or grading on a lot in a liquefaction zone? *Exceptions: do not check box for work performed on a previously developed portion of the site, stairs, patio, deck, or fence work. (refer to EP_ArcMap > CEQA Catex Determination Layers > Seismic Hazard Zones)* **If box is checked, a geotechnical report will likely be required**
☐	**Serpentine Rock:** Does the project involve any excavation on a property containing serpentine rock? *Exceptions: do not check box for stairs, patio, deck, retaining walls, or fence work. (refer to EP_ArcMap > CEQA Catex Determination Layers > Serpentine)*
***If no boxes are checked above, GO TO STEP 3. If one or more boxes are checked above, an *Environmental Evaluation Application* is required, unless reviewed by an Environmental Planner.**	
☐	**Project can proceed with categorical exemption review. The project does not trigger any of the CEQA impacts listed above.**
Comments and Planner Signature (*optional*): Jessica Range [redacted]	
Correction to exemption issued 1/23/2013. Proposed project subject to soil & groundwater remediation in compliance with Health Code Article 22B (Maher Ordinance). Project sponsor has enrolled in the Maher Program with the San Francisco Department of Public Health. Project reviewed by staff archeologist.	

STEP 3: PROPERTY STATUS – HISTORIC RESOURCE

TO BE COMPLETED BY PROJECT PLANNER

PROPERTY IS ONE OF THE FOLLOWING: *(refer to Parcel Information Map)*	
☐	Category A: Known Historical Resource. GO TO STEP 5.
☑	Category B: Potential Historical Resource (over 50 years of age). GO TO STEP 4.
☐	Category C: Not a Historical Resource or Not Age Eligible (under 50 years of age). GO TO STEP 6.

STEP 4: PROPOSED WORK CHECKLIST

TO BE COMPLETED BY PROJECT PLANNER

Check all that apply to the project.	
☐	1. **Change of use and new construction.** Tenant improvements not included.
☐	3. **Regular maintenance or repair** to correct or repair deterioration, decay, or damage to building.
☐	4. **Window replacement** that meets the Department's *Window Replacement Standards*. Does not include storefront window alterations.
☐	5. **Garage work.** A new opening that meets the *Guidelines for Adding Garages and Curb Cuts*, and/or replacement of a garage door in an existing opening that meets the Residential Design Guidelines.
☐	6. **Deck, terrace construction, or fences** not visible from any immediately adjacent public right-of-way.
☐	7. **Mechanical equipment installation** that is not visible from any immediately adjacent public right-of-way.
☐	8. **Dormer installation** that meets the requirements for exemption from public notification under *Zoning Administrator Bulletin No. 3: Dormer Windows*.
☐	9. **Addition(s)** that are not visible from any immediately adjacent public right-of-way for 150 feet in each direction; does not extend vertically beyond the floor level of the top story of the structure or is only a single story in height; does not have a footprint that is more than 50% larger than that of the original building; and does not cause the removal of architectural significant roofing features.
Note: Project Planner must check box below before proceeding.	
☑	Project is not listed. **GO TO STEP 5.**
☐	Project **does not conform** to the scopes of work. **GO TO STEP 5.**
☐	Project involves **four or more** work descriptions. **GO TO STEP 5.**
☐	Project involves **less than four** work descriptions. **GO TO STEP 6.**

STEP 5: CEQA IMPACTS – ADVANCED HISTORICAL REVIEW

TO BE COMPLETED BY PRESERVATION PLANNER

Check all that apply to the project.	
☐	1. Project involves a **known historical resource** (CEQA Category A) as determined by Step 3 and conforms entirely to proposed work checklist in Step 4.
☐	2. **Interior alterations to publicly accessible spaces.**
☐	3. **Window replacement** of original/historic windows that are not "in-kind" but are consistent with existing historic character.
☐	4. **Façade/storefront alterations** that do not remove, alter, or obscure character-defining features.
☐	5. **Raising the building** in a manner that does not remove, alter, or obscure character-defining features.
☐	6. **Restoration** based upon documented evidence of a building's historic condition, such as historic photographs, plans, physical evidence, or similar buildings.
☐	7. **Addition(s)**, including mechanical equipment that are minimally visible from a public right-of-way and meet the *Secretary of the Interior's Standards for Rehabilitation*.

☐	8. **Other work consistent** with the *Secretary of the Interior Standards for the Treatment of Historic Properties (specify or add comments)*:
☑	9. **Reclassification of property status** to Category C. *(Requires approval by Senior Preservation Planner/Preservation Coordinator)* a. Per HRER dated: 12/28/2012 *(attach HRER)* b. Other *(specify)*:

Note: If ANY box in STEP 5 above is checked, a Preservation Planner MUST check one box below.

☐	**Further environmental review required.** Based on the information provided, the project requires an *Environmental Evaluation Application* to be submitted. **GO TO STEP 6.**
☑	**Project can proceed with categorical exemption review.** The project has been reviewed by the Preservation Planner and can proceed with categorical exemption review. **GO TO STEP 6.**

Comments (*optional*):

Preservation Planner Signature: Allison K. Vanderslice [redacted]

STEP 6: CATEGORICAL EXEMPTION DETERMINATION

TO BE COMPLETED BY PROJECT PLANNER

☐	**Further environmental review required.** Proposed project does not meet scopes of work in either *(check all that apply)*: ☐ Step 2 – CEQA Impacts ☐ Step 5 – Advanced Historical Review **STOP! Must file an *Environmental Evaluation Application.***
☐	**No further environmental review is required. The project is categorically exempt under CEQA.**

Planner Name: Jessica Range	**Signature or Stamp:** Jessica Range Digitally signed by Jessica Range DN: dc=org, dc=sfgov, dc=cityplanning, ou=CityPlanning, ou=Environmental Planning, cn=Jessica Range, email=jessica.range@sfgov.org Date: 2014.06.02 11:41:55 -07'00'
Project Approval Action: Building Permit *If Discretionary Review before the Planning Commission is requested, the Discretionary Review hearing is the Approval Action for the project.	

Once signed or stamped and dated, this document constitutes a categorical exemption pursuant to CEQA Guidelines and Chapter 31 of the Administrative Code.

In accordance with Chapter 31 of the San Francisco Administrative Code, an appeal of an exemption determination can only be filed within 30 days of the project receiving the first approval action.

STEP 7: MODIFICATION OF A CEQA EXEMPT PROJECT

TO BE COMPLETED BY PROJECT PLANNER

In accordance with Chapter 31 of the San Francisco Administrative Code, when a California Environmental Quality Act (CEQA) exempt project changes after the Approval Action and requires a subsequent approval, the Environmental Review Officer (or his or her designee) must determine whether the proposed change constitutes a substantial modification of that project. This checklist shall be used to determine whether the proposed changes to the approved project would constitute a "substantial modification" and, therefore, be subject to additional environmental review pursuant to CEQA.

PROPERTY INFORMATION/PROJECT DESCRIPTION

Project Address (If different than front page)		Block/Lot(s) (If different than front page)
Case No.	Previous Building Permit No.	New Building Permit No.
Plans Dated	Previous Approval Action	New Approval Action
Modified Project Description:		

DETERMINATION IF PROJECT CONSTITUTES SUBSTANTIAL MODIFICATION

Compared to the approved project, would the modified project:	
☐	Result in expansion of the building envelope, as defined in the Planning Code;
☐	Result in the change of use that would require public notice under Planning Code Sections 311 or 312;
☐	Result in demolition as defined under Planning Code Section 317 or 19005(f)?
☐	Is any information being presented that was not known and could not have been known at the time of the original determination, that shows the originally approved project may no longer qualify for the exemption?
If at least one of the above boxes is checked, further environmental review is required	CATEX FORM

DETERMINATION OF NO SUBSTANTIAL MODIFICATION

☐	The proposed modification would not result in any of the above changes.

If this box is checked, the proposed modifications are categorically exempt under CEQA, in accordance with prior project approval and no additional environmental review is required. This determination shall be posted on the Planning Department website and office and mailed to the applicant, City approving entities, and anyone requesting written notice.

Planner Name:	Signature or Stamp:

Carroll, John (BOS)

From:	BOS Legislation, (BOS)
Sent:	Monday, May 11, 2015 10:55 AM
To:	'Stephen M. Williams'; Givner, Jon (CAT); Stacy, Kate (CAT); Byrne, Marlena (CAT); Sanchez, Scott (CPC); Jones, Sarah (CPC); Rodgers, AnMarie (CPC); Starr, Aaron (CPC); Tam, Tina (CPC); Range, Jessica (CPC); Ionin, Jonas (CPC); Storrs, Bruce (DPW); Rahaim, John (CPC); Cirelli, Gabriella (DPW); De Freitas, Paul (DPW); BOS-Supervisors; BOS-Legislative Aides
Cc:	Calvillo, Angela (BOS); Caldeira, Rick (BOS); BOS Legislation, (BOS); Carroll, John (BOS); Lamug, Joy (BOS)
Subject:	Appeal of Categorical Exemption Determination - 2251 Greenwich Street - Fire Station No. 16 - Planning Dept. Response
Categories:	140767

Good morning,

Please find linked below a memo received by the Office of the Clerk of the Board from the Planning Department, regarding the appeal of the proposed project at 2251 Greenwich Street.

Planning Memo - May 11, 2015

The appeal hearing for this matter is scheduled for a 3:00 p.m. special order before the Board on **May 19, 2015**. You are invited to review the entire matter on our Legislative Research Center by following the link below.

Board of Supervisors File No. 140767

Thanks,

John Carroll
Legislative Clerk
Board of Supervisors
San Francisco City Hall, Room 244
San Francisco, CA 94102
(415)554-4445 - Direct | (415)554-5163 - Fax
john.carroll@sfgov.org | bos.legislation@sfgov.org

Click here to complete a Board of Supervisors Customer Service Satisfaction form.

The Legislative Research Center provides 24-hour access to Board of Supervisors legislation, and archived matters since August 1998.

BOS-11, COB, Dep., Leg Opp, Clerk

SAN FRANCISCO
PLANNING DEPARTMENT

RECEIVED
BD OF SUPERVISORS
SAN FRANCISCO
2015 MAY 11 AM 10:22

MEMO

4K

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Transmittal

Planning Department Response to the Appeal of the Categorical Exemption for 2251 Greenwich Street San Francisco Fire Station No. 16

DATE:	May 11, 2015
TO:	Angela Calvillo, Clerk of the Board of Supervisors
FROM:	Sarah B. Jones, Environmental Review Officer – (415) 575-9034 Jessica Range, Senior Environmental Planner–(415) 575-9018
RE:	BOS File No. 140767 [Case No. 2012.1443APL-02] Appeal of the Categorical Exemption for 2251 Greenwich Street (San Francisco Fire Station No. 16)
HEARING DATE:	May 19, 2015

Pursuant to the San Francisco Administrative Code Chapter 31, the Planning Department has prepared a response to the Appeal of the Categorical Exemption for 2251 Greenwich Street (San Francisco Fire Station No. 16). The Planning Department is transmitting one (1) hard copy of the appeal response. In compliance with San Francisco's Administrative Code Section 8.12.5 "Electronic Distribution of Multi-Page Documents," the Planning Department has submitted a multi-page response to the Appeal of the Categorical Exemption for 2251 Greenwich Street [BF 140767] in digital format.

If you have any questions regarding this matter, please contact Jessica Range at 575-9018 or Jessica.Range@sfgov.org.

SAN FRANCISCO
PLANNING DEPARTMENT

MEMO

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Categorical Exemption Appeal

2251 Greenwich Street, San Francisco Fire Station #16

DATE:	May 11, 2015
TO:	Angela Calvillo, Clerk of the Board of Supervisors
FROM:	Sarah B. Jones, Environmental Review Officer – (415) 558-9048 Jessica Range – (415) 575-9018
RE:	Planning Case No. 2012.1443APL-02 Board File No. 140767 Appeal of Categorical Exemption for 2251 Greenwich Street San Francisco First Station #16
HEARING DATE:	May 19, 2015
ATTACHMENTS:	A. Categorical Exemption Determination with Historic Resource Evaluation Response B. Appeal Letter C. Geotracker Case Closure Report D. Letter from San Francisco Department of Public Health to Department of Public Works, November 9, 2014
PROJECT SPONSOR:	Samuel Chui, Department of Public Works, (415) 558-4082
APPELLANT:	Stephen Williams of the Law Office of Stephen M. Williams on behalf of Brent McMicking and Evan Kletter

INTRODUCTION

This memorandum and the attached documents are a response to the letter of appeal to the Board of Supervisors (the "Board") regarding the Planning Department's (the "Department") issuance of a Categorical Exemption under the California Environmental Quality Act ("CEQA Determination") for the proposed project at 2251 Greenwich Street, San Francisco Fire Station #16 (the "Project").

The Department, pursuant to Title 14 of the CEQA Guidelines, issued a Categorical Exemption for the project on June 2, 2014 finding that the proposed project is exempt from the California Environmental Quality Act (CEQA) as a Class 2 categorical exemption.

The decision before the Board is whether to uphold the Department's decision to issue a categorical exemption and deny the appeal, or to overturn the Department's decision to issue a categorical exemption and return the project to Department staff for additional environmental review.

SITE DESCRIPTION & EXISTING USE

The subject property is located at 2251 Greenwich Street on the block bounded by Greenwich Street to the north, Fillmore Street to the east, Pixley Street to the south, and Steiner Street to the west in the Marina neighborhood of San Francisco. The project site is zoned Public (P) and within a 40-X Height and Bulk District. The approximately 5,760 square foot (sf) site is fully occupied by a two-story, 33-foot tall (to top of parapet and 46 feet to top of hose tower), 8,966 sf fire station (Station #16) that was constructed in 1938.

Surrounding lots are zoned Residential House, Two-Family (RH-2) and Union Street Neighborhood Commercial District (Union Street NCD) and within a 40-X Height and Bulk District. Uses in the surrounding area are predominately residential with the presence of neighborhood serving retail uses in proximity to the site.

PROJECT DESCRIPTION

The proposed project includes demolition of the existing fire station and construction of a new, two-story, approximately 33-foot tall (up to 46-feet tall to top of elevator enclosure), 10,400 sf fire station in its place to comply with essential life safety requirements for fire station facilities. The proposed fire station would accommodate two apparatus bays for three fire trucks with supportive services and sleeping quarters. The project also includes replacement of an existing generator, removal of one underground fuel tank and replacement of a second underground fuel tank.

BACKGROUND

November 7, 2012- Environmental Evaluation Application Filed
On November 7, 2012, the Department of Public Works (hereinafter "Project Sponsor") filed an application with the Planning Department (hereinafter "Department") for a CEQA Determination for the project described above.

January 23, 2013- CEQA Clearance
On January 23, 2013, the Department determined that the project was categorically exempt under CEQA Class 2 Replacement or Reconstruction (CEQA Guidelines Section 15302) and that no further environmental review was required.

February 3, 2014- Arts Commission Review
On February 3, 2014, the Arts Commission approved the design of the proposed project by resolution No. 0203-14-043. Approval of the project's design by the Arts Commission is not a project approval and does not commit the City to implement the project, as discussed below under Response to Issue #1.

June 2, 2014- CEQA Clearance
On June 2, 2014, the Department corrected the CEQA Categorical Exemption Determination previously issued, specifying that the project would be subject to soil and groundwater remediation in compliance with Health Code Article 22A, also known as the Maher Ordinance. The CEQA Determination identified

approval of the Building Permit as the Approval Action for the project in compliance with San Francisco Administrative Code Section 31.04(h).

July 2, 2014- CEQA Appeal Filed
On July 2, 2014 Stephen Williams of the Law Offices of Stephen M. Williams, on behalf of Brent McMicking and Evan Kletter, filed an appeal of the Categorical Exemption Determination.

July 7, 2014- Planning Department Timeliness Determination
On July 7, 2014, the Planning Department determined that the CEQA appeal was not yet ripe because the Approval Action had not occurred, and therefore the appeal hearing could not be scheduled.

February 12, 2015-Building Permit Issued
On February 12, 2015, the Department of Building Inspection issued a building permit for the proposed project.

March 10, 2015 to April 30, 2015- Appeal Period
Pursuant to Section 31.08(g) of the San Francisco Administrative Code, the 30-day appeal period for a CEQA exemption determination shall begin on the first day of posting of the Approval Action on the Planning Department's website. The Planning Department posted the required notice on March 10, 2015, following notice of approval of the Building Permit by the Department of Public Works on March 10, 2015.

March 16, 2015- Notice to the Clerk of the Board of Supervisors of CEQA Appeal
On March 16, 2015 the Department notified the Clerk of the Board that the CEQA appeal filed on July 2, 2014 by Stephen Williams could be scheduled for a hearing before the Board of Supervisors in accordance with Section 31.16(b)(4) of the San Francisco Administrative Code.

Categorical Exemptions

Section 21084 of the California Public Resources Code requires that the CEQA Guidelines identify a list of classes of projects that have been determined not to have a significant effect on the environment and are exempt from further environmental review.

In response to that mandate, the State Secretary of Resources found that certain classes of projects, which are listed in CEQA Guidelines Sections 15301 through 15333, do not have a significant impact on the environment, and therefore are categorically exempt from the requirement for the preparation of further environmental review.

CEQA State Guidelines Section 15302, or Class 2, consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and have substantially the same purpose and capacity as the structure replaced. The proposed project is the demolition of an existing fire station and construction of a new fire station on the same site with substantially the same purpose and capacity as the structure replaced.

In determining the significance of environmental effects caused by a project, CEQA State Guidelines Section 15064(f) states that the decision as to whether a project may have one or more significant effects shall be based on substantial evidence in the record of the lead agency. CEQA State Guidelines 15604(f)(5) offers the following guidance: "Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumption predicated upon facts, and expert opinion supported by facts."

APPELLANT ISSUES AND PLANNING DEPARTMENT RESPONSES

The concerns raised in the July 2, 2014 Appeal Letter are cited below and are followed by the Department's responses.

Issue 1: Project Sponsor did not adequately notify the public of the Arts Commission review for the proposed project and the June 2, 2014 CEQA Determination violated CEQA because it occurred after the February 3, 2014 Arts Commission Review of the proposed project, which constituted approval of the project.

Response 1: Public notification of the Arts Commission review of a proposed project is not a CEQA topic and the Arts Commission review of the proposed project is not an "Approval Action" under Chapter 31 of the Administrative Code. The approval action (issuance of a Building Permit) occurred subsequent to the June 2, 2014 CEQA Determination.

Concerns surrounding notification of the Arts Commission hearings are not a CEQA topic and are more appropriately addressed to the Arts Commission and/or the project sponsor. With regards to the Arts Commission review and the timing of the CEQA Determination, the Arts Commission review is not an approval action under Chapter 31 of the Administrative Code because their review does not grant any entitlement, does not commit the City to a definite course of action in regard to the project, or allow the proposed project to move forward in any way. The Arts Commission is primarily concerned with the design of a public building from a purely aesthetic point and their review may help to further define the project that will ultimately undergo CEQA review. Thus, in compliance with Section 31.04(h)(2)(A) of the Administrative Code, the June 2, 2014 CEQA Determination properly identified the approval action as approval of the Building Permit, which subsequently occurred on February 12, 2015.

Issue 2: The January 23, 2013 CEQA Determination failed to note that the project included replacement of one underground storage tank and removal of another as well as replacement of a diesel generator; failed to note that the site is contained on the Maher Map as a hazardous waste site; and the project description did not mention the presence of historically documented underground storage tanks.

Response 2: The January 23, 2013 CEQA Determination is not the subject of this appeal.

The subject of this appeal is the CEQA Determination issued on June 2, 2014 because that determination is what was relied upon to approve the proposed project. No approvals were granted prior to the June 2, 2014 CEQA Determination. See the above discussion under Response to Issue 1 substantiating that the Arts Commission Review does not constitute an Approval Action per Chapter 31 of the Administrative Code.

Issue 3: The project will disturb more than 5,000 gross square feet of soil and is required to comply with the San Francisco Public Utilities Commission's (SFPUC) Stormwater Management Ordinance.

Response 3: The appellant states that the project is subject to the SFPUC's Stormwater Management Ordinance. Compliance with the City's Stormwater Management Ordinance does not affect the CEQA Determination.

The proposed project is subject to, and complies with, the Stormwater Management Ordinance, which would reduce the project's effect on the City's Stormwater system by reducing the overall volume of stormwater requiring treatment at SFPUC's wastewater treatment facilities below existing, baseline conditions. Therefore, stormwater effects would improve compared to existing conditions and there would be no adverse impact on the City's stormwater collection and treatment facilities.

Issue 4: The Department is precluded from issuing a Categorical Exemption because the project site is on a hazardous waste list compiled pursuant to Section 65962.5 of the Government Code, demonstrating the presence of potentially hazardous materials. Due to the presence of potentially hazardous materials onsite, the project should include mitigation measures and the Department should prepare a Mitigated Negative Declaration.

Response 4: The project site's listing on the "Cortese List" (a list of sites complied pursuant to Section 65962.5 of the Government Code) does not necessarily preclude the issuance of a categorical exemption when a closure letter from the appropriate state agency, or their designee, has been issued. The proposed project would not result in a significant impact on the environment as a result of hazardous material releases.

The appellant cites to California Public Resources Code Section 21084(c) to support the claim that any project on this site is precluded from the issuance of a Categorical Exemption. Lists compiled pursuant to Section 65962.5 of the Government Code are commonly known as the "Cortese List." The appellant states that due to the site's inclusion on the Cortese List and potential presence of hazardous materials, the Department should issue a Mitigated Negative Declaration with certain mitigation measures including a contingency plan if residual contaminants are detected, require workers at the site to adhere to certain hygienic standards, and heightened dust control.

The Cortese list includes hazardous waste sites from the Department of Toxic Substances Control's (DTSC) EnviroStor database, a list of hazardous facilities identified by DTSC that are subject to corrective

action pursuant to Health and Safety Code Section 25187.5, a list of leaking underground storage tank sites maintained by the state Water Board in their Geotracker database, a list of solid waste disposal sites maintained by the state Water Board, and a list of sites with active cease and desist orders and clean up and abatement orders.

The project site is located on the Cortese List because it is identified on the Water Board's Geotracker database as a site with a previous leaking underground storage tank (UST). However, the site was issued a case closure letter by the San Francisco Bay Regional Water Quality Control Board and the reason for its placement on this list has since been abated. Of importance, once a site is placed on this list, it is never removed from the list, even after the site has been remediated and no longer presents a hazard to the public. One of the possible reasons why sites remain on the Cortese List is because remediation techniques may include capping the site (or containment of the hazardous material) so that the hazardous material no longer presents a risk to humans or the environment. However, a subsequent project that includes excavation or would otherwise disturb that containment, could expose the public and the environment to hazardous materials within the soil/groundwater that were previously contained.

In order to determine whether the project could present a risk to humans or the environment as a result of hazardous materials within the soil or groundwater, it is important to understand both the history of site as well as the regulations in place to protect the health of the public and workers. Both are discussed below.

Underground Storage Tank History

A memorandum from the Department of Public Works summarizes the history of USTs at the site:[1]

- Removal of a UST in 1987 and installation of a monitoring well in 1988: A 1956 UST was removed from the site in September of 1987.[2] The UST was found to be in good condition and no groundwater was encountered during excavation required for the UST removal. Soil samples were subsequently collected and found that petroleum hydrocarbons exceeded allowable levels. Under the direction of the San Francisco Department of Public Health (SFDPH), as part of their Local Oversight Program, a monitoring well was installed in 1988. The UST was removed and the pit backfilled with clean excavated soils and fill.
- Removal of the monitoring well in 1998:[3] The SFDPH approved the removal of the monitoring well related to the removal of 1956 UST on September 3, 1998 (10 years later). SFDPH issued a Remedial Action Completion Certificate on October 29, 1998 indicating that all site investigation and remedial action for the UST were completed and no further action was required. This letter

[1] Memorandum to Jessica Range, SF Planning Department-Environmental Planning from Frank Filice and Sandy Ngan, San Francisco Department of Public Works. April 30, 2014. Subject: Underground Storage Tanks at Fire Station #16- 2251 Greenwich Street. This document is on file and available for public review at 1650 Mission Street, Suite 400, San Francisco, CA 94103 as part of Planning Department Case File No: 2012.1443E.

[2] Clayton Environmental Consultants, Inc. *Tank Closure Report at the San Francisco Fire Department Station NO. 16 for the City and County of San Francisco, CA.* December 21. 1987. This document is on file and available for public review at 1650 Mission Street, Suite 400, San Francisco, CA 94103 as part of Planning Department Case File No. 2012.1443E.

[3] OGISO Environmental. *Report of Closure-In-Place of an Underground Storage Tank and Destruction of Monitoring Well.* June 30, 2001. This document is on file and available for public review at 1650 Mission Street, Suite 400, San Francisco, CA 94103 as part of Planning Department Case File No. 2012.1443E.

was issued pursuant to authority granted to SFDPH's Local Over Sight Program (LOP) by the San Francisco Bay Regional Water Quality Control Board (Attachment C).

- Installation of a UST and UST closure-in-place in 1998: The San Francisco Fire Department (SFFD) approved the installation of a 3,000 gallon UST on the site on March 12, 1998. During excavation for the UST installation, a previously unknown 600-gallon UST was discovered approximately four feet below ground surface. Soil samples collected in the area surrounding the previously unknown UST found that petroleum hydrocarbons did not exceed allowable levels. The SFDPH approved closure in place of the UST by cement slurry. The 3,000-gallon UST was installed adjacent to the 600-gallon UST.

Proposed Underground Storage Tank Removal and Replacement

The proposed project includes removal of the previously installed 3,000 gallon UST and previously closed-in-place 600-gallon UST. The project would install a new 3,000 gallon UST with a new oil separator system, bringing the UST system up to current standards. As discussed in the June 2, 2014 CEQA Determination, the proposed project would be subject to Article 22A of the San Francisco Health Code, also known as the Maher Ordinance. The Maher Ordinance, administered by SFDPH, requires remediation of soil and groundwater for sites with suspected contamination due to past or current uses. The project sponsor has enrolled in SFDPH's Maher program and pursuant to the Maher Ordinance, has reviewed background reports and files including an Environmental Soil Characterization Report prepared in November 2012.[4] In a letter dated November 9, 2014, SFDPH summarizes the findings of their review which indicate that, with the exception of arsenic, all contaminates are below the Regional Water Quality Control Board's Environmental Screening Levels (ESLs) (Attachment D). Arsenic levels were representative of background concentrations. SFDPH has concluded that there is no further action at this time in regards to compliance with Health Code Article 22A. However, SFDPH notes that if the proposed USTs are to be removed from the site, permits shall be obtained from SFDPH's Hazardous Materials Unified Program Agency (HMUPA), the SFFD, and the Department of Public Works (DPW).

Applicable Regulations/Programs Addressing Underground Storage Tanks, Hazardous Soil/Groundwater Construction Dust Control, and Worker Safety

Health Code Article 21, SFDPH's Hazardous Materials Unified Program Agency: SFDPH is the HMUPA responsible for providing regulatory oversight for the construction, operation, repair and removal of USTs in the City and County of San Francisco, in accordance with the California Health and Safety Code, Chapter 6.7; Title 23 of the California Code of Regulations, and the San Francisco Health Code, Article 21. The purpose of the regulation is to prevent releases of petroleum and other hazardous substances stored in USTs. The program conducts all routine, construction, modification, repair and closure inspections of UST systems in San Francisco. As the HMUPA, SFDPH has issued guidelines for the installation and closure of USTs to ensure the prevention of releases of hazardous materials, including the collection of soil samples following UST installation or removal. During tank removal a HMUPA inspector is on site to witness soil and/or groundwater sampling. A UST removal report is required by the

[4] AWE Engineering. *Environmental Characterization Report, Fire Station No. 16 Renovation Project, San Francisco Fire Department, San Francisco, CA.* November 2012. This document is on file and available for public review at 1650 Mission Street, Suite 400, San Francisco, CA 94103 as part of Planning Department Case File No. 2012.1443E.

HMUPA and includes soil and ground water sampling analyses and a description of the UST removal. The report also includes observations, such as odors, discoloration in the soil, and holes in the UST. Based on these observations and analytical results a UST removal may be referred to the Local Oversight Program (LOP) of SFDPH. The LOP program has authority from the State Water Resources Board to review reports, respond to reports, place USTs in the LOP program and issue case closure letters with concurrence from the Regional Water Quality Control Board. Owners and operators are required to obtain a UST operating permit, as well as permits for the closure or modification of existing USTs, and adhere to the SFDPH's Guidelines. In addition to compliance with SFDPH's HMUPA requirements, the SFFD and/or DPW may require permits to install or remove USTs and various conditions of those permits would apply.

Health Code Article 22A, Hazardous Waste Management (Maher Ordinance): The Maher Ordinance is administered by SFDPH and requires that for sites with known or expected soil or groundwater contamination, a project sponsor conduct soil and/or groundwater sampling and analysis. Where the analysis reveals the presence of hazardous substances in excess of state or federal standards, the project sponsor is required to submit a site mitigation plan (SMP) and to remediate any site contamination in accordance with an approved SMP prior to issuance of any building permit. The November 9, 2014 letter from SFDPH (Attachment D) confirms that the project sponsor has entered into the Maher program and that no further action is required at this time to comply with Health Code Article 22A.

Health Code Article 22B, Construction Dust Control: This ordinance requires that all site preparation work, demolition, or other construction activities within San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures whether or not the activity requires a permit from the Department of Building Inspection (DBI). The project sponsor and the contractor responsible for construction activities at the project site are required to ensure that there would be no visible dust during construction activities. The contractor is required to use the following practices to control construction dust on the site or other practices that result in equivalent dust control that are acceptable to the Director of DBI. Dust suppression activities may include watering all active construction areas sufficiently to prevent dust from becoming airborne; increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Contractors are required to provide as much water as necessary to control dust (without creating run-off in any area of land clearing, and/or earth movement). During excavation and dirt-moving activities, contractors are required to wet sweep or vacuum the streets, sidewalks, paths and intersections where work is in progress at the end of the workday. Inactive stockpiles (where no disturbance occurs for more than seven days) greater than 10 cubic yards or 500 square feet of excavated materials, backfill material, import material, gravel, sand, road base, and soil shall be covered with a 10 millimeter (0.01 inch) polyethylene plastic (or equivalent) tarp, braced down, or use other equivalent soil stabilization techniques.

In addition to the above local regulations, the protection of worker safety during UST installation and removal is under the purview of California Occupational Safety and Health Administration (Cal/OSHA). However, a HMUPA inspector has authority to stop a UST installation or removal and require that a Cal/OSHA inspector inspect the site for any safety issues pertaining to worker safety.

In summary, CEQA Guidelines Sections 15301 through 15333 provide a list of categorical exemptions that have been determined not to have a significant effect on the environment and which are therefore exempt from additional environmental review. While categorical exemptions are qualified by the exceptions listed in CEQA Guidelines Section 15300.2, including a site's listing on the Cortese List, a site's inclusion on this list does not necessarily demonstrate that the project will have a significant effect on the environment, especially considering a site will remain on the Cortese List following remediation. The project sponsor would be required to adhere to the above regulations when removing and installing USTs and during construction of the new fire station. The requirements outlined in the above regulations protect the health and welfare of the public, workers and the environment and would ensure that no significant environmental effects would occur. Therefore, mitigation measures recommended by the appellant, which are substantially similar to the requirements in the regulations described above, are unnecessary. Compliance with the aforementioned regulations would ensure the proposed project would not result in a significant hazard to the public or the environment through the release of hazardous materials.

Issue 5: The location, size and type of proposed construction present an unusual circumstance. Due to the presence of unusual circumstances, the Department cannot be certain that there is no possibility of a significant environmental effect to air, land and noise, hazardous materials, and the neighborhood and social environment.

Response 5: The project's location, size and type of construction do not present an unusual circumstance and even if unusual circumstances were present, the project would not have a significant effect on the environment.

The determination of whether a project is eligible for a categorical exemption is based on a two-step analysis: (1) determining whether the project meets the requirements of the categorical exemption, and (2) determining whether there are unusual circumstances at the site or with the proposal that would result in a reasonable possibility of a significant effect. The project types that are listed in CEQA Guidelines Sections 15301 through 15333 have been determined not to have a significant environmental effect. Absent the presence of usual circumstances at the site or with the proposed project that could present a reasonable possibility of a significant effect, these classes of projects have been determined to be exempt from CEQA review. The proposed project meets the requirements of the Class 2 CEQA exemption because it would replace the existing approximately 8,966 sf and 33-foot-tall (up to 46-feet tall to top of hose tower) fire station at 2251 Greenwich Street and construct a new approximately 10,400, 33-foot tall (up to 46-feet tall to top of elevator enclosure) fire station located on the same site as the existing fire station and having substantially the same purpose and capacity of the existing fire station. Thus, the project meets the Class 2 CEQA exemption criteria.

The Appellant states that the project's size, location and type of construction present an unusual circumstance. However, the appellant does not in any way substantiate or provide evidence of any unusual circumstance. As discussed above, the new fire station would have substantially the same capacity as the existing fire station. The new fire station would be two stories, rising to a total height of about 42-feet (to the roof parapet). Buildings in the surrounding area are similarly two and three-stories or two-stories over a garage and extend to the 40-foot height limit (and higher for allowable rooftop

appurtenances). With regards to location, the new fire station would replace an existing fire station on the same site. There is nothing unusual about the fire station's location in a primarily residential neighborhood. There are currently 44 fire stations located throughout San Francisco, with a majority of those fire stations located in primarily residential areas or near residential land uses. Finally, there does not appear to be anything unusual about the type of building construction proposed. The proposed project would use a shallow foundation system of concrete piers, grade beams and structure slab-on-grade. The estimated construction schedule is 14 months. Therefore, there does not appear to be anything unusual about the proposed project's size, location or type of construction and the appellant has not provided any evidence supporting that there may be unusual circumstances at the site or with the proposed project.

The Appellant also states that the project could not meet the standard of no possibility of an adverse environmental impact and specifically states that there is a possibility of environmental effects related to hazardous materials, air quality, land and noise, and the neighborhood and social environment. But this is not the standard under CEQA. With regards to categorical exemptions, the standard is not whether or not there is a possibility of an adverse environmental effect, but rather whether substantial evidence supports the use of the categorical exemption, whether substantial evidence shows that there is or is not an unusual circumstance, and, only if there is an unusual circumstance, whether a fair argument based on substantial evidence in the record indicates that a significant adverse environmental effect could result from that unusual circumstance. The Appellant has not provided any evidence of an unusual circumstance and has not refuted the Department's substantial evidence that there are no unusual circumstances present at the site or with the project.

Environmental effects of a project are measured based on the existing conditions at the project site, which for 2251 Greenwich Street consists of an existing operational fire station. For the reasons discussed below, the proposed project would not result in a significant adverse environmental effect from release of hazardous materials, to air quality, land and noise and neighborhood character. In regards to social effects referenced by the appellant, social effects are not environmental effects under CEQA. CEQA Guidelines Section 15382 defines a significant effect on the environment to mean "a substantial, or potentially substantial, change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment." The appellant has not stated what the project's potential social effect could be or provided any evidence that the project could result in a social effect, thus it is not possible to determine whether that undefined social effect could result in any secondary environmental effect.

Hazardous Materials

There are no unusual circumstances regarding the project or the project site related to hazardous materials, and the proposed project would not result in a significant environmental effect from below ground hazardous materials for the reasons discussed in Response to Issue 4, above. Other hazardous materials include hazardous building materials that would need to be removed during the demolition of the existing fire station. The disposal of hazardous building materials including lead-based paint, asbestos, and other hazardous building materials are regulated by existing federal, state and local laws. A

Hazardous Materials Survey Report[5] was prepared for the proposed project to identify the presence of asbestos containing materials, lead based paint and other regulated materials that may be affected during demolition of the fire station. The report identified asbestos containing materials, lead-based paint, and other regulated materials in light tubes, ballasts, and illuminated signs. However, the removal and disposal of these materials are highly regulated and compliance with the applicable federal, state, and local regulations would ensure that there would be no significant environmental effect as a result of hazardous materials released into the environment. The applicable regulations are discussed below.

Asbestos Containing Materials

Section 19827.5 of the *California Health and Safety Code* requires that local agencies not issue demolition or alternation permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The Bay Area Air Quality Management District (BAAQMD) is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and is to be notified of any demolition or renovation project that involves the removal of 100 square feet or more of asbestos-containing materials 10 days in advance of the work. Notification includes the names and addresses of operations and persons responsible; description and location of the structure to be demolished including size, age and prior use; the approximate amount of friable asbestos to be removed or disturbed; the scheduled starting and completion dates of demolition or abatement; the nature of the planned work and methods to be employed to meet BAAQMD requirements; and the name and location of the waste disposal site to be used. Approved methods of control of asbestos-containing materials during abatement include adequate wetting of all asbestos-containing materials and providing containment with a negative air pressure ventilation system to prevent migration of asbestos-containing materials. BAAQMD randomly inspects asbestos removal operations and will inspect any removal operation when a complaint has been received.

The local office of (Cal/OSHA) must be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow state regulations contained in 8CCR1529 and 8CCR341.6 through 341.17 where there is asbestos-related work involving 100 square feet or more of asbestos-containing material. Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services. The contractor and hauler of the material are required to file a Hazardous Waste Manifest which details the hauling of the material from the site and disposal of it. Pursuant to California law, DBI would not issue the required permit until the applicant has complied with the notice and abatement requirements discussed above. Therefore, compliance with the regulations described above would ensure that there would be no significant environmental effect as a result of removal of asbestos-containing building materials.

[5] Millennium Consulting Associates. *Hazardous Materials Survey Report, Fire Station No. 16, 2251 Greenwich Street, San Francisco, CA 94123.* September 10, 2012. This document is on file and available for public review at 1650 Mission Street, Suite 400, San Francisco, CA 94103 as part of Planning Department Case File No. 2012.1443E.

Lead Based Paint

Projects proposing work on any pre-1979 buildings must comply with Section 3425 of the San Francisco Building Code (Building Code), Work Practices for Lead-Based Paint on Pre-1979 Buildings and Steel Structures. Section 3425 contains performance standards, including establishment of containment barriers and identifies prohibited practices that may not be used in disturbance or removal of lead-based paint. Any person performing work subject to Section 3425 shall make all reasonable efforts to prevent migration of lead paint contaminants beyond containment barriers during the course of the work, and any person performing regulated work shall make all reasonable efforts to remove all visible lead paint contaminants from all regulated areas of the property prior to completion of the work.

Section 3425 also includes notification requirements, contents of notice, and requirements for project site signs. Prior to commencement of exterior work that disturbs or removes 100 or more square feet or 100 or more linear feet of lead-based paint in total, the responsible party must provide the Director of DBI with written notice that describes the address and location of the proposed project; the scope and specific location of the work; whether the responsible party has reason to know or presume that lead-based paint is present; the methods and tools for paint disturbance and/or removal; the approximate age of the structure; anticipated job start and completion dates for the work; whether the building is residential or nonresidential; whether it is owner-occupied or rental property; the approximate number of dwelling units, if any; the dates by which the responsible party has or will fulfill any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager number of the party who will perform the work. Further notice requirements include: a Post Sign notifying the public of restricted access to work area, a Notice to Residential Occupants, Availability of Pamphlet related to protection from lead in the home, and Early Commencement of Work (by Owner, Requested by Tenant), and Notice of Lead Contaminated Dust or Soil, if applicable. Section 3425 contains provisions regarding inspection and sampling for compliance by DBI, and enforcement, and describes penalties for non-compliance with the requirements of the ordinance. The proposed project would be subject to and would comply with the above regulations; therefore, impacts from lead-based paint would not be significant.

Other Building Materials

Other hazardous building materials include polychlorinated bi-phyenol (PCB) containing light ballasts and mercury in lighting fixtures and self-illuminating signs. All light ballasts containing PCBs are required to be removed by personnel trained in PCB-related work (inspection, removal, and clean-up). All workers must also follow the Cal/OSHA regulations governing the removal and handling of PCB products including the Code of Federal Regulations (CFR) Title 29 Section 1910.120-Hazardous Waste Operations and Emergency Response and 8CCR Title 8 Section 5192-Hazardous Waste Operations and Emergency Response.

Fixtures and self-illuminating signs typically contain mercury at levels that exceed the California Environmental Protection Agency (Cal/EPA) Total Threshold Limit Concentration and/or Soluble Threshold Limit Concentration values and must be sent to an authorized recycle facility or to a universal waste consolidator for shipment to an authorized recycling facility. Any fixture not designated for recycling or continued use, must be handled, managed and disposed of as a hazardous waste in accordance with Cal/EPA Title 22 requirements. Therefore, compliance with existing regulations would

ensure that hazardous building materials to be removed or demolished would not result in a significant environmental effect.

Air Quality

There are no unusual circumstances related to the project or project site that would impact air quality. The proposed project would not result in any net new operational air pollutant emissions. The site is currently occupied by an existing fire station and would continue that use upon construction of the proposed fire station. The project would include replacement of an existing diesel generator, estimated to be at least 20 years old, with a new United States Environmental Protection Agency Tier 4 rated generated. Emergency generators are regulated by the BAAQMD through their New Source Review (Regulation 2, Rule 5) permitting process. The project sponsor would be required to obtain applicable permits to operate an emergency generator from the BAAQMD.As part of the permitting process, the BAAQMD would limit the excess cancer risk from any facility to no more than ten per one million population and requires any source that would result in an excess cancer risk greater than one per one million population to install Best Available Control Technology for Toxics (TBACT). Given that the project would replace the existing older generator with a new Tier 4-compliant generator that would be subject to the BAAQMD permitting requirements, the project would result in lower air pollutant emissions than the existing facility.

With regards to air pollutant effects during construction, the BAAQMD in their *CEQA Air Quality Guidelines* (May 2011), has developed screening criteria to determine if projects would violate an air quality standard, contribute substantially to an air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants within the San Francisco Bay Area Air Basin. If a proposed project meets the screening criteria, then the project not would result in significant criteria air pollutant impacts. A project that exceeds the screening criteria may require a detailed air quality assessment to determine whether criteria air pollutant emissions would exceed significance thresholds. The proposed project would not exceed any construction criteria air pollutant screening levels identified in the BAAQMD's *CEQA Air Quality Guidelines*.[6] Therefore, construction-related air pollutant emissions would not be significant.

Land, Noise, and Neighborhood Character

There are no unusual circumstances related to the project or project site that would create impacts to land use, noise, or neighborhood character. The proposed project would demolish an existing fire station and construct a new fire station of substantially the same size in its place. Upon completion of construction activities, there would be no change from existing conditions at the site. Therefore, there would be no significant effects to land use, noise or neighborhood character. Additionally, the proposed project's construction activities are subject to the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code; Noise Ordinance). The Noise Ordinance requires that construction work be conducted in the following manner: (1) noise levels of construction equipment, other than impact tools, must not exceed 80 dBA[7] 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 the Department of Public Works

[6] Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, Updated May 2011. Table 3-1.

[7] dBA refers to A-weighted decibels and are an expression of the relative loudness of sounds in air as perceived by the human ear.

(DPW) or the Director of the DBI to best accomplish maximum noise reduction; and (3) if the noise from the construction work would exceed the ambient noise levels at the site property line by 5 dBA, the work must not be conducted between 8:00 p.m. and 7:00 a.m. unless the Director of DPW authorizes a special permit for conducting the work during that period. Compliance with the Noise Ordinance would ensure that construction noise would not be significant.

CONCLUSION

There is substantial evidence in the record to show that the project meets the requirements for a Class 2 exemption under CEQA and that no unusual circumstances relative to the project or the project site exist. The Appellant has provided no evidence of any unusual circumstances. The Appellant has not provided any substantial evidence or expert opinion to refute the conclusions of the Department.

For the reasons stated above and in the June 2, 2014 CEQA Categorical Exemption Determination, the CEQA Determination complies with the requirements of CEQA and the Project is appropriately exempt from environmental review pursuant to the cited exemption. The Department therefore recommends that the Board uphold the CEQA Categorical Exemption Determination and deny the appeal of the CEQA Determination.

Attachment A

SAN FRANCISCO
PLANNING DEPARTMENT

CEQA Categorical Exemption Determination

PROPERTY INFORMATION/PROJECT DESCRIPTION

Project Address		Block/Lot(s)	
2251 Greenwich Street		0515/031	
Case No.	Permit No.	Plans Dated	
2012.1443E	N/A	09/10/12	
☐ Addition/ Alteration	☑ Demolition (requires HRER if over 50 years old)	☑ New Construction	☐ Project Modification (GO TO STEP 7)

Project description for Planning Department approval.

Demolition and new construction of Fire Station #13. The proposed project includes demolition of the existing 2-story, 10,272 square foot (sf) fire station built in 1938 and construction of a new 2-story, 10,398 sf fire station on the same lot with three programmed areas: (1) Apparatus bay and support, (2) firefighter operations, and (3)living quarters. The project also includes replacement of the roof top generator, removal of one underground storage tank and replacement of a second underground storage tank.

STEP 1: EXEMPTION CLASS

TO BE COMPLETED BY PROJECT PLANNER

Note: If neither class applies, an *Environmental Evaluation Application* is required.*	
☐	**Class 1 – Existing Facilities.** Interior and exterior alterations; additions under 10,000 sq. ft.; change of use under 10,000 sq. ft. if principally permitted or with a CU.
☐	**Class 3 – New Construction.** Up to three (3) new single-family residences or six (6) dwelling units in one building; commercial/office structures; utility extensions.
☑	Class 2 Replacement & reconstruction of existing structures/facilities. New structure located on the same site as structure replaced with substantially the same purpose & capacity.

STEP 2: CEQA IMPACTS

TO BE COMPLETED BY PROJECT PLANNER

If any box is checked below, an *Environmental Evaluation Application* is required.	
☐	**Transportation:** Does the project create six (6) or more net new parking spaces or residential units? Does the project have the potential to adversely affect transit, pedestrian and/or bicycle safety (hazards) or the adequacy of nearby transit, pedestrian and/or bicycle facilities?
☐	**Air Quality:** Would the project add new sensitive receptors (specifically, schools, day care facilities, hospitals, residential dwellings, and senior-care facilities) within an air pollution hot spot? *(refer to EP_ArcMap > CEQA Catex Determination Layers > Air Pollution Hot Spots)*
☑	**Hazardous Materials:** If the project site is located on the Maher map or is suspected of containing hazardous materials (based on a previous use such as gas station, auto repair, dry cleaners, or heavy manufacturing, or a site with underground storage tanks): Would the project involve 50 cubic yards or more of soil disturbance - or a change of use from industrial to residential? If yes, this box must be checked and the project applicant must submit an Environmental Application with a Phase I Environmental Site Assessment. *Exceptions: do not check box if the applicant presents documentation of enrollment in the San Francisco Department of Public Health (DPH) Maher program, a DPH waiver from the Maher program, or other documentation from Environmental Planning staff that hazardous material effects would be less than significant (refer to EP_ArcMap > Maher layer).*

STEP 4: PROPOSED WORK CHECKLIST

TO BE COMPLETED BY PROJECT PLANNER

Check all that apply to the project.	
☐	1. **Change of use and new construction.** Tenant improvements not included.
☐	3. **Regular maintenance or repair** to correct or repair deterioration, decay, or damage to building.
☐	4. **Window replacement** that meets the Department's *Window Replacement Standards.* Does not include storefront window alterations.
☐	5. **Garage work.** A new opening that meets the *Guidelines for Adding Garages and Curb Cuts,* and/or replacement of a garage door in an existing opening that meets the Residential Design Guidelines.
☐	6. **Deck, terrace construction, or fences** not visible from any immediately adjacent public right-of-way.
☐	7. **Mechanical equipment installation** that is not visible from any immediately adjacent public right-of-way.
☐	8. **Dormer installation** that meets the requirements for exemption from public notification under *Zoning Administrator Bulletin No. 3: Dormer Windows.*
☐	9. **Addition(s)** that are not visible from any immediately adjacent public right-of-way for 150 feet in each direction; does not extend vertically beyond the floor level of the top story of the structure or is only a single story in height; does not have a footprint that is more than 50% larger than that of the original building; and does not cause the removal of architectural significant roofing features.
Note: Project Planner must check box below before proceeding.	
☑	Project is not listed. **GO TO STEP 5.**
☐	Project **does not conform** to the scopes of work. **GO TO STEP 5.**
☐	Project involves **four or more** work descriptions. **GO TO STEP 5.**
☐	Project involves **less than four** work descriptions. **GO TO STEP 6.**

STEP 5: CEQA IMPACTS – ADVANCED HISTORICAL REVIEW

TO BE COMPLETED BY PRESERVATION PLANNER

Check all that apply to the project.	
☐	1. Project involves a **known historical resource (CEQA Category A)** as determined by Step 3 and conforms entirely to proposed work checklist in Step 4.
☐	2. **Interior alterations to publicly accessible spaces.**
☐	3. **Window replacement** of original/historic windows that are not "in-kind" but are consistent with existing historic character.
☐	4. **Façade/storefront alterations** that do not remove, alter, or obscure character-defining features.
☐	5. **Raising the building** in a manner that does not remove, alter, or obscure character-defining features.
☐	6. **Restoration** based upon documented evidence of a building's historic condition, such as historic photographs, plans, physical evidence, or similar buildings.
☐	7. **Addition(s),** including mechanical equipment that are minimally visible from a public right-of-way and meet the *Secretary of the Interior's Standards for Rehabilitation.*

STEP 7: MODIFICATION OF A CEQA EXEMPT PROJECT

TO BE COMPLETED BY PROJECT PLANNER

In accordance with Chapter 31 of the San Francisco Administrative Code, when a California Environmental Quality Act (CEQA) exempt project changes after the Approval Action and requires a subsequent approval, the Environmental Review Officer (or his or her designee) must determine whether the proposed change constitutes a substantial modification of that project. This checklist shall be used to determine whether the proposed changes to the approved project would constitute a "substantial modification" and, therefore, be subject to additional environmental review pursuant to CEQA.

PROPERTY INFORMATION/PROJECT DESCRIPTION

Project Address (If different than front page)		Block/Lot(s) (If different than front page)
Case No.	Previous Building Permit No.	New Building Permit No.
Plans Dated	Previous Approval Action	New Approval Action
Modified Project Description:		

DETERMINATION IF PROJECT CONSTITUTES SUBSTANTIAL MODIFICATION

Compared to the approved project, would the modified project:	
☐	Result in expansion of the building envelope, as defined in the Planning Code;
☐	Result in the change of use that would require public notice under Planning Code Sections 311 or 312;
☐	Result in demolition as defined under Planning Code Section 317 or 19005(f)?
☐	Is any information being presented that was not known and could not have been known at the time of the original determination, that shows the originally approved project may no longer qualify for the exemption?
If at least one of the above boxes is checked, further environmental review is required	**CATEX FORM**

DETERMINATION OF NO SUBSTANTIAL MODIFICATION

☐	The proposed modification would not result in any of the above changes.
If this box is checked, the proposed modifications are categorically exempt under CEQA, in accordance with prior project approval and no additional environmental review is required. This determination shall be posted on the Planning Department website and office and mailed to the applicant, City approving entities, and anyone requesting written notice.	
Planner Name:	**Signature or Stamp:**

SAN FRANCISCO
PLANNING DEPARTMENT

Historic Resource Evaluation Response

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Date	December 28, 2012
Case No.:	**2012.1443E**
Project Address:	**2251 Greenwich Street (Station #16)**
Zoning:	P (Public) 40-X Height and Bulk District
Block/Lot:	0515/031
Staff Contact:	Allison Vanderslice, Preservation Planner (415) 575 - 9075 allison.vanderslice@sfgov.org

PART I: HISTORIC RESOURCE EVALUATION

Buildings and Property Description

The subject parcel is located on the south side of Greenwich Street between Steiner Street and Fillmore Street in the Marina District. The property is San Francisco Fire Station #16 and is located within a P (Public) Zoning District and a 40-X Height and Bulk District.

2251 Greenwich Street was constructed in 1938 in the Spanish Eclectic / Mission Revival style as a fire station for the San Francisco Fire Department (SFFD). In 1955-56 the building underwent a major renovation funded by the 1952 Firehouse Bond. The two-story, reinforced concrete fire station is now in the altered Modern style. The irregular plan building is topped with a gable roof toward the north (primary façade), a narrow flat-roofed addition at the east, a shed roof at the center, a flat-roofed deck toward the south, and flat-roofed, one story kitchen wing at the southwest corner. The cladding is stucco and fenestration is primarily multi-lite, fixed metal sash windows. The primary façade (north) contains two rectangular apparatus room openings with metal roll-up doors.

Pre-Existing Historic Rating / Survey

The subject property is not included on any historic resource surveys or listed on any local, state or national registries. The building is considered a "Category B" property (Properties Requiring Further Consultation and Review) for the purposes of the Planning Department's California Environmental Quality Act (CEQA) review procedures due to its age (constructed in 1938).

Neighborhood Context and Description

The subject parcel is within a mixed-use district comprised primarily of mulit-family residences with some commercial buildings closer to Fillmore Street in the Cow Hollow neighborhood of the Marina District. The majority of buildings on the subject block face were constructed in the early 20th century and are interspersed with ~~some later development. The area does not appear to constitute a cohesive collection of styles or types. Prior to~~ the construction of Station #16 in 1938, the lot was occupied by three commercial buildings fronting on Greenwich Street with residential in the rear fronting on Pixley Street. 2251 Greenwich Street was constructed in 1938 for Engine 20, which was relocated from 2666 Lombard Street, several blocks to the west of the subject parcel.

San Francisco 1952 Firehouse Bond Act Thematic Historic District

A Historic Resource Evaluation Report prepared by Page & Turnbull in March 2010 for 676 Howard Street (Station #1) identified 14 firehouses as constituting a potential discontiguous thematic historic district that is significant under Criterion 1 (Events) and Criterion 3 (Architecture).[4] The proposed district is notable for the strong collection of International Style firehouses and as the largest firehouse building campaign undertaken by the City of San Francisco. The period of significance relates to the construction campaign authorized by the 1952 Firehouse Bond Act that dates from 1952 to 1961. The firehouse inventory compiled by Page & Turnbull for the proposed discontiguous district includes firehouses that were built between 1953 and 1961 in the International Style and does not include existing stations that were altered or upgraded during that period. While the subject property underwent major alterations in 1955-1956 as part of the construction campaign, the building is clearly a stripped down version of its earlier style and is not an example of the International Style. 2251 Greenwich Street does not contain the character-defining features of the district nor did it significantly contribute to the modernization of the SFFD and, therefore, it is not a contributing property to the San Francisco 1952 Firehouse Bond Act Thematic Historic District.

Criterion 1: Property is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

Constructed in 1938, the subject property does not appear to be associated with any events significant in the history of the SFFD or San Francisco generally. While Station #16 was renovated in the mid-1950s as part of the 1952 Firehouse Bond Act, this association is not significant in the broader trend of the modernization of the SFFD. Therefore, Staff finds that the subject property is not associated with any historically significant events and is not eligible for inclusion on the California Register individually or as a contributor to a potential historic district under Criterion 1.

Criterion 2: Property is associated with the lives of persons important in our local, regional or national past.

Records do not indicate that any persons significant in the local, regional or national past are associated with the subject property. The station was constructed during the tenure of Chief Brennan but does not appear to be associated with him directly or with the main achievements of his career. Therefore, the subject property is not eligible under Criterion 2.

Criterion 3: Property embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values.

The property was constructed in 1938 as a firehouse in the Spanish Eclectic style. The original architect and builder were not identified. The building underwent a major alteration in 1955-56 which included the following changes: the façade was reclad and stripped of all ornamentation; the apparatus room openings were converted from arched openings to rectangle openings; and all windows and doors were replaced. Due to these alterations, the building is no longer a good example of the Spanish Eclectic style. Although the building underwent a major alteration in the 1950s, it is not a good example of the International Style or Modern-period architecture generally, particularly with the gable roof. Therefore, it is not a good

[4] Page & Turnbull, *Historic Resources Evaluation for SFFD Station No. 1, 676 Howard Street, San Francisco, California*, March 31, 2010. A copy of this report is on file with the Planning Department at 1650 Mission Street, Suite 400 and is available for public review as part of project file 2009.0291E.

CEQA Historic Resource Determination

☐ Historical Resource Present
- ☐ Individually-eligible Resource
- ☐ Contributor to an eligible Historic District
- ☐ Non-contributor to an eligible Historic District

☒ No Historical Resource Present

PART I: SENIOR PRESERVATION PLANNER REVIEW

Signature: _____ Date: 1-16-2013

Tina Tam, *Senior Preservation Planner*

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code
Other Listings
Review Code Reviewer Date

Resource name(s) or number(assigned by recorder) 2251 Greenwich Street

P1. Other Identifier:
*P2. Location: ☐Not for Publication ☒Unrestricted *a. County San Francisco
*b. USGS 7.5' Quad San Francisco North, Calif Date: 1995
*c. Address 2251 Greenwich Street City San Francisco Zip 94123
*e. Other Locational Data: Assessor's Parcel Number Block: 0515 Lot 031

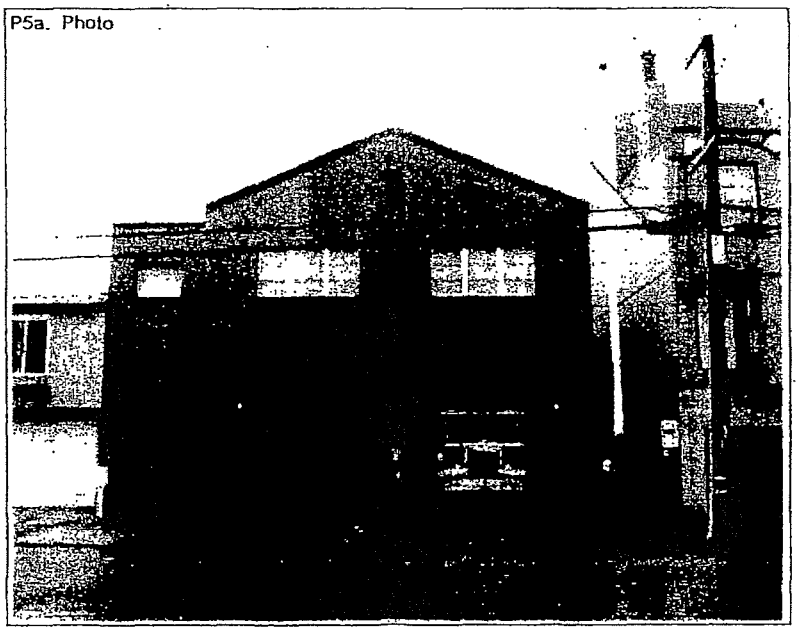
*P3a. Description: (Describe resource and its major elements. Include design materials condition alterations, size, setting, and boundaries.)

2251 Greenwich Street occupies a 48' x 120' lot on the south side of Greenwich Street, between Steiner and Fillmore Streets. Built in 1938, the two-story, reinforced concrete fire station is designed in an altered Modern style The irregular-plan building is clad in smooth stucco. It is capped by a gable roof toward the north a narrow flat-roofed addition at the east, a shed roof at the center, a flat-roofed deck toward the south, and a flat-roofed kitchen wing at the southwest corner The primary façade faces north It features a four-light steel-sash hopper window behind a metal grille at the first story, as well as two apparatus room (garage) openings with roll-up metal doors One four-light steel-sash hopper window and two three-part multi-light steel-sash awning windows are located at the second story The façade terminates in a metal vent in the gable end and a simple cornice and concrete parapet The primary entrance is located in a recessed bay to the west, and is accessed through a metal gate within a scored stucco concrete wall. A brick walkway leads to a shed-roofed entrance portico, which features original decorative wood posts, a carved arched opening, and brackets. The entrance contains a partially glazed metal replacement door
(Continued)

*P3b. Resource Attributes: (list attributes and codes) HP14 Government Building

*P4. Resources Present: ☒Building ☐Structure ☐Object ☐Site ☐District ☐Element of District ☐Other

P5a. Photo



P5b. Photo: (view and date)
View from north (13 February 2012)

*P6. Date Constructed/Age and Sources: ☒historic
1938 (SFFD Museum)

*P7. Owner and Address:
San Francisco City Property
25 Van Ness Avenue
San Francisco, CA 94102

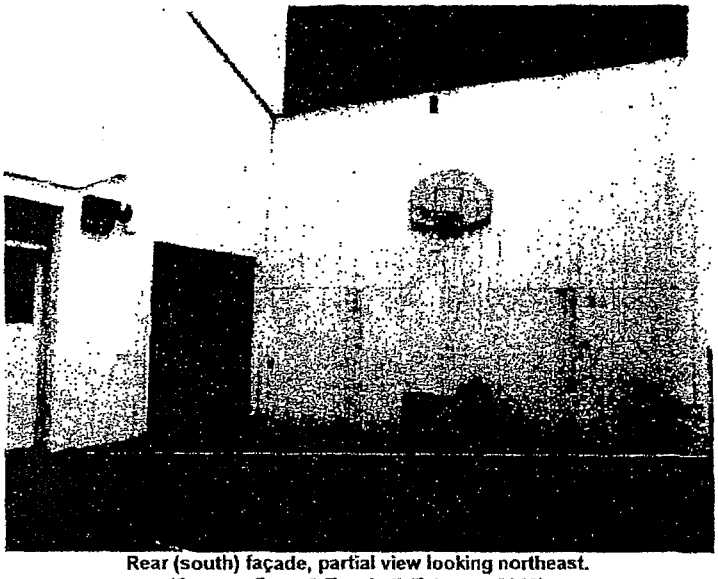
*P8. Recorded by:
Page & Turnbull, Inc
1000 Sansome Street, Suite 200
San Francisco, CA 94111

*P9. Date Recorded:
2/15/2012

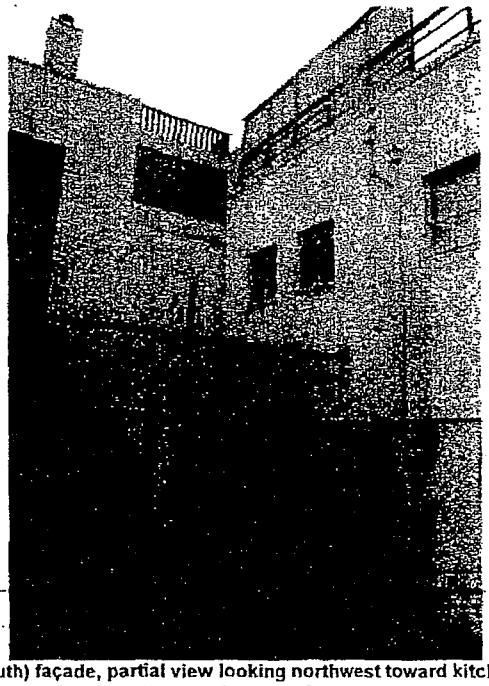
*P10. Survey Type:
Intensive

*P11. Report Citation: (Cite survey report and other sources, or enter "none")
None

*Attachments: ☐None ☐Location Map ☐Sketch Map ☒Continuation Sheet ☒Building, Structure, and Object Record
☐Archaeological Record ☐District Record ☐Linear Feature Record ☐Milling Station Record ☐Rock Art Record
☐Artifact Record ☐Photograph Record ☐ Other (list)



Rear (south) façade, partial view looking northeast.
(Source: Page & Turnbull, February 2012)



Rear (south) façade, partial view looking northwest toward kitchen wing.
(Source: Page & Turnbull, February 2012)

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
Primary #
HRI#

BUILDING, STRUCTURE, AND OBJECT RECORD

*NRHP Status Code 6Z
*Resource Name or # 2251 Greenwich Street

B1 Historic name: San Francisco Fire Department Engine No 20
B2 Common name San Francisco Fire Department Station 16
B3. Original Use Fire station B4 Present use Fire Station
*B5. **Architectural Style:** altered Modern
*B6. **Construction History:** (Construction date, alterations, and date of alterations)

- Constructed in 1938 in a Spanish Eclectic style
- Conversion of apparatus room arched openings to rectangular openings; re-cladding of primary façade; removal of buttresses, cornice, and clay tile roof; replacement of all windows; replacement of doors; construction of second-story additions on east side and south end (1955-1956; no permits on file)
- Removal of all existing roofing and installation of new built-up roofing system and waterproofing at roof edges (June 1994, Permit #746387)
- General interior remodeling of dormitory and toilet/locker rooms; mechanical and electrical system upgrade; women's facilities, and ADA-accessibility on first floor (December 1994 Permit #767920)
- New overhead apparatus room doors (Drawing elevation, 1994)

*B7. **Moved?** ☒No ☐Yes ☐Unknown **Date:**_____ **Original Location:**_____
*B8. **Related Features:** None.

B9a. Architect Unknown b. Builder Unknown
*B10. **Significance: Theme** Infrastructure and Government Services Development **Area** Cow Hollow
Period of Significance N/A **Property Type** Fire Station **Applicable Criteria** N/A
(Discuss importance in terms of historical or architectural context as defined by theme, period, and geographic scope. Also address integrity)

2251 Greenwich Street was constructed in 1938 as a fire station for the City of San Francisco Fire Department (SFFD). It is a single engine station. The original architect and builder are unknown The fire station is located in the Cow Hollow neighborhood, a mixed-use district of commercial buildings and residences originally developed during the nineteenth century

The Paid Fire Department of the City and County of San Francisco went into active operation on 3 December 1866, before which it was operated entirely on a volunteer basis. The Fire Department's third Chief Engineer, David Scannell, assumed the office in 1871 and held the position until his death in 1893. He recommended limiting frame buildings to sixty feet in height and installing fire escapes and standpipes on tall buildings San Francisco was expanding rapidly, and Chief Scannell took every precaution to keep abreast of its needs. By the late 1870s, membership had grown to 276 regulars plus 201 on-call volunteers.[1] (continued)

B11 Additional Resource Attributes: (List attributes and codes)_____

*B12. **References:**
See continuation sheet, pg 6

B13. Remarks

*B14. **Evaluator:** Christina Dikas, Page & Turnbull

*Date of Evaluation: February 15, 2012

(This space reserved for official comments.)

Sketch Map

DPR 523B (1/95) *Required information

[1] "Historical Review, Part II: The Paid Department," *San Francisco Fire Department Museum*, web site accessed on 24 March 2011 from http://www.guardiansofthecity.org/sffd/history/paid_department.html.

B10. Significance (continued)

Integrity
2251 Greenwich Street has been greatly altered, though it continues to be used as a San Francisco fire station Alterations include altering the shape of the apparatus room door openings, remodeling the primary façade to a modern style constructing second story additions at the east side and the south end of the building, and conducting interior alterations and upgrades. Therefore it retains integrity of location, setting, and association. It does not retain integrity of design, materials, workmanship or feeling Overall, the property does not retain integrity.

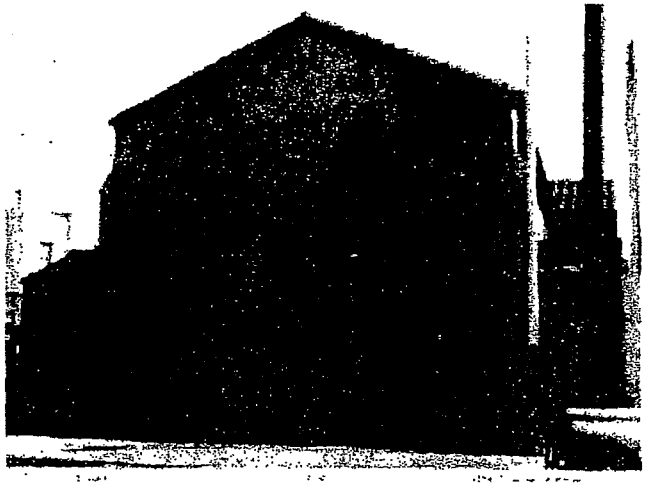
Historic Significance
2251 Greenwich Street does not appear to be associated with events that have made a significant contribution to the broad patterns of our history such that it would be eligible for local designation under National Register Criterion A (California Register Criterion 1) Its original construction is not associated with any major fire station construction program in San Francisco, nor did it play a pivotal role in the growth of the Cow Hollow neighborhood Its 1950s renovations were funded by an important 1952 Bond Act but it does not appear individually eligible for this association

2251 Greenwich Street does not appear to be associated with any persons significant to the history of the State of California or the City of San Francisco such that it would be eligible under National Register Criterion B (California Register Criterion 2) None of the people directly associated with the building appear to be significant to local, state, or national history.

2251 Greenwich Street does not appear eligible under National Register Criterion C (California Register Criterion 3) because it does not feature high artistic value, and it does not embody the distinctive characteristics of a type, method, or period of construction. The original architect is unknown Furthermore, the fire station has been greatly altered and does not retain integrity

This property was not assessed for its potential to yield information important in prehistory or history, per National Register Criterion D (California Register Criterion 4).

Based on the above assessment, 2251 Greenwich Street is designated with a CHRSC code of 6Z, which means it has been "Found ineligible for NR, CR or Local designation through survey evaluation."



2251 Greenwich Street, 1938.
(Source: San Francisco Fire Department Museum)

2251 Greenwich Street, ca. 1956.
(Source: San Francisco Fire Department Museum)

B12. References (continued)

"Current Firehouse of San Francisco," Guardians of the City Website accessed on 23 July 2009 from: http://guardiansofthecity.org.

Historical Review, Part II: The Paid Department," *San Francisco Fire Department Museum*, web site accessed on 24 March 2011 from http://www.guardiansofthecity org/sffd/history/paid_department html

Sanborn Fire Insurance Maps: 1913, 1950, 1998.

San Francisco Department of Building Inspection, permit records and plans.

San Francisco Firehouse Survey (ca 1991).

SMW LAW OFFICES OF
STEPHEN M. WILLIAMS

1934 Divisadero Street | San Francisco, CA 94115 | TEL: 415.292.3656 | FAX: 415.776.8047 | smw@stevewilliamslaw.com

Attachment B

RECEIVED
BOARD OF SUPERVISORS
SAN FRANCISCO

2014 JUL -2 PM 2:33

July 2, 2014

David Chiu, President
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, City Hall
San Francisco, CA 94102

RE: 2251 Greenwich Street—Firehouse #16
Environmental Application # 2012.1443E
Appeal of Categorical Exemption Determination

Dear President Chiu and Members of the Board:

INTRODUCTION AND BACKGROUND

This office represents the adjacent neighbors to the proposed Project Brent McMicking and Evan Kletter. Mr. McMicking and Mr. Kletter are the adjacent property owners immediately to the west of the subject Project site. They both own their homes and reside at the site with their families, both of which include small children.

The proposed project is the demolition and replacement of Firehouse #16 at 2251 Greenwich Street. Because the site has always been a Firehouse, it has always had underground storage tanks---that leaked gasoline and other fuels. Leaks were discovered in 1965 and again in 1987. The Leaking Underground Storage Tanks at the site were last declared "clean" in late 1998. Nevertheless, obviously there are now aging underground tanks in place at the site since that time, now slated for replacement as part of this project. The site appears on the State Water Resources Control Board 'Geo-Tracker" Map as a Leaking Underground Storage Tank site with a previous clean-up..

Because this is a public building located on a development lot which is zoned "Public" under the Planning Code, the notice process and any and all review of the Project is limited and conducted through the Civic Design Review Committee of the San Francisco Arts Commission. Our investigation revealed that the Civic Design Review process was not properly conducted for this Project.

Even though the DPW officials sponsoring the Project, and the Project manager Gabriella Judd Cirelli were keenly aware of the neighbors' objections to, and interest in, the Project, the neighbors were deliberately *not* given notice of the several presentations made to the Committee, including the presentation for final approval before the full San Francisco Arts Commission on February 3, 2014. No neighbor was given notice and no neighbor attended any of these "public" hearings. The entire process was a sham.

Because the neighbors were not notified of these public meeting, they were denied the opportunity to present public comment regarding the proposed new firehouse and to request mitigations on the Project to reduce the impacts to their homes—including

possible environmental impacts. There was an affirmative obligation under the Civic Design process to provide written notice of these meetings to the neighbors prior to the conduct of the Civic Design Review process that has been ongoing since October 2012.

The process and the neighbors' rights have been violated and the CEQA review by the Board of Supervisors is the only other public review process open to the neighbors. The environmental review was also completely mishandled by DPW and Planning. In fact, the Project received its "final approval" from the Arts Commission on February 3, 2014, and the new Categorical Exemption was not issued until June 2, 2014, some four months after the "final approval." CEQA review is required to pre-date such approvals and is supposed to be the starting point for project review, not a last hurtle to be overcome. The Project does not conform to the requirements set forth in CEQA for an exemption. The Board should remand the exemption determination to the Planning Department for further action and review.

Summary of Grounds for Appeal of Categorical Exemption

1. The Department has issued a *Second* Categorical Exemption dated June 2, 2014, (attached hereto) for the site based on an incorrect Department interpretation of CEQA that *narrows* the scope of environmental protection for the public rather than expanding such protection as required by law and court decisions interpreting CEQA.

2. Astoundingly, even though this is a "cookie-cutter" Project and a design being repeated all over the City for re-building Firehouses, the first environmental analysis failed to even note the presence of underground diesel storage tanks at the site, failed to note that the Project included replacement of one tank and the removal of another tank, failed to note the site is contained on the Maher Map as a hazardous waste site (the site was not enrolled in the Maher program until the neighbors complained) and failed to comply with any aspect of the environmental review process. The site has been a City Firehouse for more than 100 years and is confirmed to have a long history of leaking underground storage tanks and many other toxins and pollutants at the site.

3. The Project has received all approvals without any public vetting or discussion of the Project. Officials from the Dept of Public Works (the "Project Sponsor") affirmatively perjured themselves in the application process in order to avoid notifying the neighbors of any public hearings on the Project. As a result, no public hearing of any kind has ever been held on this massive new Project slated for this 100% residential neighborhood. The neighbors are apprehensive because they have been lied to by DPW and denied any chance for public input on the Project. DPW was charged with affirmatively notifying the neighbors of public hearings at the Arts Commission and failed to do so and yet falsely informed the Art's Commission that the public was notified. As a result, no member of the public was present for any "hearing."

4. The Project description did not mention that the site is a historically documented UST site, and on the California State map for UST's. The Project description failed to

mention that it includes excavation and replacement of tanks at the site and the placement of a new diesel-burning generator on the roof. The Environmental application submitted to Planning made no mention of these facts and was not accurately completed. The application also incorrectly stated that excavation at the site will not exceed eight (8') in depth and will not require disturbance of soil in excess of 5,000 gross square feet. Both of these questions were incorrectly answered on the Planning Dept's Application by DPW.

5. The Project will disturb more than 5,000 gross square feet of surface soil as the lot is 5,760 square feet in area and is being completely graded and excavated (in addition to the tank removal). Further, the Project is required to comply with the new Storm-water Management Ordinance from the SFPUC which has the same triggering number (disturbance of 5,000 gross square feet of surface soil).

6. The adjacent neighbors have very small children and of course, they are quite apprehensive not only because of the UST site but also because this property has long been (only) used as a Fire Station and the reports in the file show extensive toxins throughout the building to be demolished—especially worrisome since this is a 100% residential neighborhood. We requested that the Planning Dept revoke the Cat Ex for this Project, that the applications be corrected and resubmitted and that the Project be referred to DPH for review under the Maher Ordinance and those steps were taken, but the neighbors remain apprehensive because every aspect of the first review by the Dept was incorrect and secretive.

7. The Department's Second Categorical Exemption is based on the incorrect conclusion that the Department is *certain* the site (a state-mapped toxic waste site and leaking underground storage tank site) does not present any *possibility* of an adverse environmental impact; an irrational and unreasonable conclusion.

8. The recent testing and analysis at the site shows the continued presence of many toxins. The history of the site as a hazardous waste site and its proximity to the water table dictates that the Department should require a mitigation plan to be in place. Grading and excavation of the site could expose construction personnel and the public to contamination present in the soil associated with historic on-site uses.

9. The Department should rescind the Second Categorical Exemption given to the Project and issue a Mitigated Negative Declaration requiring DPW to develop and have in place a contingent mitigation plan to protect workers and the public if:

-Potential residual contaminants are detected in areas already tested;

-Requiring workers at the site to strictly adhere to hygienic standards to avoid dermal contact and incidental ingestion;

-Heightened dust control and masking to prevent inhalation of airborne dust released from dried hazardous materials—the neighbors have small children;

-While not anticipated once closure reports have been issued (such as here) the possibility remains that contamination (which was not encountered during soil sampling) is still present. It is possible given the site's long history of leaking underground tanks that contaminants still are present or that additional tanks are present which were installed prior to permitting and record keeping requirements. A plan should be in place to deal with such possibilities and to prevent migration of contaminants;

-Due to the migratory nature of oil in the soil, the risk remains for oil to exist in the soil in areas that have not been previously sampled or tested. The Project Sponsor should be required to develop and have in place a plan to deal with such an eventuality, including a system of wind barriers and retained qualified and licensed professionals to conduct on-going site control and monitoring who remain ready to commence work in any contaminated area.

Additional Grounds For Appeal:

The following exceptions to a Categorical Exemption are relevant in this case, based on Section 15300.2 of CEQA, Article 19:

A) **The Site is a Former Hazardous Waste Site and There Is a Specific Statutory Exception From The Categorical Exemption**

The Project site was on the State's Hazardous Waste and Substances Site List; clean-up and remedial action was twice rendered at the site for removal of leaking underground storage tanks. California Public Resources Code Section 21084(c) provides a specific exception to a categorical exemption if a site is listed on any of the State's Hazardous Waste Sites. That section states:

> **"No Project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code shall be exempted from this division ...."**

The Project site's appearance on the list of the States Hazardous Waste Sites precludes the categorical exemption that was again granted it by the Department. As a matter of law, the categorical exemptions are to be narrowly defined. It cannot be said that this site has not appeared on ANY list of Hazardous Waste Sites; it has; and a broad based reading of this exception and the site's appearance on the list (past or present) precludes the use of categorical exemption.

B) **The Department Applied The Wrong Standard For a Categorical Exemption And Has Misinterpreted the Statute Which Forbids a Exemption in this Case**

In order to grant to this site a Categorical Exemption, the Department offers its own "interpretation" of the above code section without reference to any supporting case law or guidelines for the interpretation. Citing the removal of the five leaking underground storage tanks, the Department states as follows:

The Department does not explain or offer any support for its interpretation of the law, and it is Appellants' contention that such an interpretation is contrary to the intent of CEQA and to the well established rules for its interpretation. The Department's interpretation is *under inclusive* while CEQA and its guidelines are specifically meant to be interpreted in a broad fashion and to be *over inclusive* to provide the citizens of California with the greatest possible environmental protection.

One of the basic principals to govern the application of CEQA is that the statute and the guidelines are to be interpreted as broadly as possible in order to provide the maximum protection to the environment and to the people of California. In the first case to interpret CEQA, the California Supreme Court made it clear that ambiguous language found in the statute was to be applied broadly rather than narrowly. In, Friends of Mammoth v Board of Supervisors 8 Cal.3rd 247 (1972), Justice Stanley Mosk wrote that the Act (CEQA) is to be interpreted and construed so as to give the environment the fullest protection possible. This analysis, now known as the "*Mammoth* interpretive principle" was based on the legislative statements of intent and is still applicable today.

The Department's narrow interpretation of Section 15300.2 is incorrect as a matter of law and violated the principles of CEQA requiring broad interpretation of its provisions. Because the Project site is included on one of the State's Hazardous Waste lists, it is not eligible for a Categorical Exemption and the Department should re-evaluate the Project and include specific mitigations because of the distinct possibility that further contaminants my be uncovered during excavation at the site.

C) The Site Can Never Meet the High Standard Of "Certainty" of "No Possibility" of an Adverse Environmental Impact

The second provision of CEQA relied upon by the Department has also been incorrectly applied and interpreted by the Department. Section 15061(b)(3) provides that a Project may be given a Categorical Exemption is it can be said with *certainty* that there is *no possibility* of an adverse environmental impact. By definition, with the issuing of the second C.E., the Department is saying that there is **absolute certainty** in this case and **no possibility** construction activity will have a significant effect on the environment.

It is hard to imagine a more unusual circumstance that could have a significant environmental impact than the proposal to construct a large new industrial building on a hazardous/toxic waste site. The location, size and type of the proposed construction is an unusual circumstance that represents an exception to the CatEx approval. The Department's analysis treats this property as if it was any other site and completely ignores the long history of toxics and hazardous materials at the site. One is tempted to

ponder, what would constitute "possible" effect on the environment? It is certainly a "possibility" that toxics are still present on the property at unacceptable levels. In fact, the testing done by the City confirms this fact. It is also reasonable to assume that the excavation of the entire lot might release some of those toxins into the surrounding environment (perhaps without even knowing it). The bottom line is, Why not require a mitigation plan IF such toxins are found at the site? Why not have DPW draw up a contingency plan to provide for this reasonable possibility? The Department should require a mitigation plan for such a contingency to be in place. The blanket categorical exemption is not appropriate.

The proposed size of the structure is also an "unusual circumstance." The building is slated to be much larger than any building constructed in the area and is the only through lot on the block, and therefore it is reasonable to assume it could cause significant environmental disruption both in terms of air, land and noise, effecting the neighborhood and the social and physical environment. The Project is **not** consistent with the zoning in the area and is the only lot zoned "P" on the block. This allows the Project to increase bulk and eliminate any rear yard.

D) The Project Could Have a Significant Effect on the Environment:

By definition with the issuing of the CatEx, the Department is saying that there is **no possibility** construction activity will have a significant effect on the environment due to circumstances at the site. The location, size and type of the proposed construction is an unusual circumstance that represents an exception to the CatEx approval. The building is much larger than any building constructed in the area, and therefore could cause significant environmental disruption both in terms of air, land and noise, but also of the resulting effects on the neighborhood and the social and physical environment. The location's proximity to schools, children and the tourist destinations of visitors to San Francisco further disqualifies it for categorical exemption under the code, and is a compelling argument for a greater standard of environmental review.

Conclusion

For these reasons, we appeal the granting of a categorical exemption by the San Francisco City Planning Department to the Project sponsor, DPW. We respectfully request that the San Francisco Board of Supervisors require the current Building's demolition and the construction of any new building on the lot to undergo environmental mitigation review as required by CEQA.

VERY TRULY YOURS,

Stephen M. Williams

SAN FRANCISCO
PLANNING DEPARTMENT

CEQA Categorical Exemption Determination

PROPERTY INFORMATION/PROJECT DESCRIPTION

Project Address		Block/Lot(s)	
2251 Greenwich Street		0515/031	
Case No.	Permit No.	Plans Dated	
2012.1443E	N/A	09/10/12	
☐ Addition/ Alteration	☑ Demolition (requires HRER if over 50 years old)	☑ New Construction	☐ Project Modification (GO TO STEP 7)

Project description for Planning Department approval.

Demolition and new construction of Fire Station #13. The proposed project includes demolition of the existing 2-story, 10,272 square foot (sf) fire station built in 1938 and construction of a new 2-story, 10,398 sf fire station on the same lot with three programmed areas: (1) Apparatus bay and support, (2) firefighter operations, and (3)living quarters. The project also includes replacement of the roof top generator, removal of one underground storage tank and replacement of a second underground storage tank.

STEP 1: EXEMPTION CLASS

TO BE COMPLETED BY PROJECT PLANNER

Note: If neither class applies, an *Environmental Evaluation Application* is required.*	
☐	**Class 1 – Existing Facilities.** Interior and exterior alterations; additions under 10,000 sq. ft.; change of use under 10,000 sq. ft. if principally permitted or with a CU.
☐	**Class 3 – New Construction.** Up to three (3) new single-family residences or six (6) dwelling units in one building; commercial/office structures; utility extensions.
☑	Class 2 Replacement & reconstruction of existing structures/facilities. New structure located on the same site as structure replaced with substantially the same purpose & capacity.

STEP 2: CEQA IMPACTS

TO BE COMPLETED BY PROJECT PLANNER

If any box is checked below, an *Environmental Evaluation Application* is required.	
☐	**Transportation:** Does the project create six (6) or more net new parking spaces or residential units? Does the project have the potential to adversely affect transit, pedestrian and/or bicycle safety (hazards) or the adequacy of nearby transit, pedestrian and/or bicycle facilities?
☐	**Air Quality:** Would the project add new sensitive receptors (specifically, schools, day care facilities, hospitals, residential dwellings, and senior-care facilities) within an air pollution hot spot? *(refer to EP_ArcMap > CEQA Catex Determination Layers > Air Pollution Hot Spots)*
☑	**Hazardous Materials:** If the project site is located on the Maher map or is suspected of containing hazardous materials (based on a previous use such as gas station, auto repair, dry cleaners, or heavy manufacturing, or a site with underground storage tanks): Would the project involve 50 cubic yards or more of soil disturbance - or a change of use from industrial to residential? If yes, this box must be checked and the project applicant must submit an Environmental Application with a Phase I Environmental Site Assessment. *Exceptions: do not check box if the applicant presents documentation of enrollment in the San Francisco Department of Public Health (DPH) Maher program, a DPH waiver from the Maher program, or other documentation from Environmental Planning staff that hazardous material effects would be less than significant (refer to EP_ArcMap > Maher layer).*

☑	**Soil Disturbance/Modification:** Would the project result in soil disturbance/modification greater than two (2) feet below grade in an archeological sensitive area or eight (8) feet in a non-archeological sensitive area? *(refer to EP_ArcMap > CEQA Catex Determination Layers > Archeological Sensitive Area)*
☐	**Noise:** Does the project include new noise-sensitive receptors (schools, day care facilities, hospitals, residential dwellings, and senior-care facilities) fronting roadways located in the noise mitigation area? *(refer to EP_ArcMap > CEQA Catex Determination Layers > Noise Mitigation Area)*
☐	**Subdivision/Lot Line Adjustment:** Does the project site involve a subdivision or lot line adjustment on a lot with a slope average of 20% or more? *(refer to EP_ArcMap > CEQA Catex Determination Layers > Topography)*
☐	**Slope = or > 20%: :** Does the project involve excavation of 50 cubic yards of soil or more, square footage expansion greater than 1,000 sq. ft., shoring, underpinning, retaining wall work, or grading on a lot with a slope average of 20% or more? *Exceptions: do not check box for work performed on a previously developed portion of site, stairs, patio, deck, or fence work. (refer to EP_ArcMap > CEQA Catex Determination Layers > Topography)* **If box is checked, a geotechnical report is required and a Certificate or higher level CEQA document required**
☐	**Seismic: Landslide Zone:** Does the project involve excavation of 50 cubic yards of soil or more, square footage expansion greater than 1,000 sq. ft., shoring, underpinning, retaining wall work, grading –including excavation and fill on a landslide zone – as identified in the San Francisco General Plan? *Exceptions: do not check box for work performed on a previously developed portion of the site, stairs, patio, deck, or fence work. (refer to EP_ArcMap > CEQA Catex Determination Layers > Seismic Hazard Zones)* **If box is checked, a geotechnical report is required and a Certificate or higher level CEQA document required**
☐	**Seismic: Liquefaction Zone:** Does the project involve excavation of 50 cubic yards of soil or more, square footage expansion greater than 1000 sq ft, shoring, underpinning, retaining wall work, or grading on a lot in a liquefaction zone? *Exceptions: do not check box for work performed on a previously developed portion of the site, stairs, patio, deck, or fence work. (refer to EP_ArcMap > CEQA Catex Determination Layers > Seismic Hazard Zones)* **If box is checked, a geotechnical report will likely be required**
☐	**Serpentine Rock:** Does the project involve any excavation on a property containing serpentine rock? *Exceptions: do not check box for stairs, patio, deck, retaining walls, or fence work. (refer to EP_ArcMap > CEQA Catex Determination Layers > Serpentine)*
***If no boxes are checked above, GO TO STEP 3. If one or more boxes are checked above, an *Environmental Evaluation Application* is required, unless reviewed by an Environmental Planner.**	
☐	**Project can proceed with categorical exemption review. The project does not trigger any of the CEQA impacts listed above.**
Comments and Planner Signature (*optional*): Jessica Range	

Correction to exemption issued 1/23/2013. Proposed project subject to soil & groundwater remediation in compliance with Health Code Article 22B (Maher Ordinance). Project sponsor has enrolled in the Maher Program with the San Francisco Department of Public Health. Project reviewed by staff archeologist.

STEP 3: PROPERTY STATUS – HISTORIC RESOURCE
TO BE COMPLETED BY PROJECT PLANNER

PROPERTY IS ONE OF THE FOLLOWING: *(refer to Parcel Information Map)*	
☐	**Category A:** Known Historical Resource. **GO TO STEP 5.**
☑	**Category B:** Potential Historical Resource (over 50 years of age). **GO TO STEP 4.**
☐	**Category C:** Not a Historical Resource or Not Age Eligible (under 50 years of age). **GO TO STEP 6.**

STEP 4: PROPOSED WORK CHECKLIST
TO BE COMPLETED BY PROJECT PLANNER

Check all that apply to the project.	
☐	1. **Change of use and new construction.** Tenant improvements not included.
☐	3. **Regular maintenance or repair** to correct or repair deterioration, decay, or damage to building.
☐	4. **Window replacement** that meets the Department's *Window Replacement Standards*. Does not include storefront window alterations.
☐	5. **Garage work.** A new opening that meets the *Guidelines for Adding Garages and Curb Cuts*, and/or replacement of a garage door in an existing opening that meets the Residential Design Guidelines.
☐	6. **Deck, terrace construction, or fences** not visible from any immediately adjacent public right-of-way.
☐	7. **Mechanical equipment installation** that is not visible from any immediately adjacent public right-of-way.
☐	8. **Dormer installation** that meets the requirements for exemption from public notification under *Zoning Administrator Bulletin No. 3: Dormer Windows.*
☐	9. **Addition(s)** that are not visible from any immediately adjacent public right-of-way for 150 feet in each direction; does not extend vertically beyond the floor level of the top story of the structure or is only a single story in height; does not have a footprint that is more than 50% larger than that of the original building; and does not cause the removal of architectural significant roofing features.
Note: Project Planner must check box below before proceeding.	
☑	Project is not listed. **GO TO STEP 5.**
☐	Project **does not conform** to the scopes of work. **GO TO STEP 5.**
☐	Project involves **four or more** work descriptions. **GO TO STEP 5.**
☐	Project involves **less than four** work descriptions. **GO TO STEP 6.**

STEP 5: CEQA IMPACTS – ADVANCED HISTORICAL REVIEW
TO BE COMPLETED BY PRESERVATION PLANNER

Check all that apply to the project.	
☐	1. Project involves a **known historical resource (CEQA Category A)** as determined by Step 3 and conforms entirely to proposed work checklist in Step 4.
☐	2. **Interior alterations to publicly accessible spaces.**
☐	3. **Window replacement** of original/historic windows that are not "in-kind" but are consistent with existing historic character.
☐	4. **Façade/storefront alterations** that do not remove, alter, or obscure character-defining features.
☐	5. **Raising the building** in a manner that does not remove, alter, or obscure character-defining features.
☐	6. **Restoration** based upon documented evidence of a building's historic condition, such as historic photographs, plans, physical evidence, or similar buildings.
☐	7. **Addition(s)**, including mechanical equipment that are minimally visible from a public right-of-way and meet the *Secretary of the Interior's Standards for Rehabilitation*.

☐	8. Other work consistent with the *Secretary of the Interior Standards for the Treatment of Historic Properties* (*specify or add comments*):
☑	9. Reclassification of property status to Category C. *(Requires approval by Senior Preservation Planner/Preservation Coordinator)* a. Per HRER dated: 12/28/2012 *(attach HRER)* b. Other *(specify)*:
Note: If ANY box in STEP 5 above is checked, a Preservation Planner MUST check one box below.	
☐	**Further environmental review required.** Based on the information provided, the project requires an *Environmental Evaluation Application* to be submitted. **GO TO STEP 6.**
☑	**Project can proceed with categorical exemption review.** The project has been reviewed by the Preservation Planner and can proceed with categorical exemption review. **GO TO STEP 6.**
Comments (*optional*):	
Preservation Planner Signature: Allison K. Vanderslice	

STEP 6: CATEGORICAL EXEMPTION DETERMINATION

TO BE COMPLETED BY PROJECT PLANNER

☐	**Further environmental review required.** Proposed project does not meet scopes of work in either *(check all that apply)*: ☐ Step 2 – CEQA Impacts ☐ Step 5 – Advanced Historical Review **STOP! Must file an *Environmental Evaluation Application*.**	
☐	**No further environmental review is required. The project is categorically exempt under CEQA.**	
	Planner Name: Jessica Range	**Signature or Stamp:** Jessica Range Digitally signed by Jessica Range DN: dc=org, dc=sfgov, dc=cityplanning, ou=CityPlanning, ou=Environmental Planning, cn=Jessica Range, email=jessica.range@sfgov.org Date: 2014.06.02 11:41:55 -07'00'
	Project Approval Action: Building Permit *If Discretionary Review before the Planning Commission is requested, the Discretionary Review hearing is the Approval Action for the project.	
	Once signed or stamped and dated, this document constitutes a categorical exemption pursuant to CEQA Guidelines and Chapter 31 of the Administrative Code. In accordance with Chapter 31 of the San Francisco Administrative Code, an appeal of an exemption determination can only be filed within 30 days of the project receiving the first approval action.	

STEP 7: MODIFICATION OF A CEQA EXEMPT PROJECT

TO BE COMPLETED BY PROJECT PLANNER

In accordance with Chapter 31 of the San Francisco Administrative Code, when a California Environmental Quality Act (CEQA) exempt project changes after the Approval Action and requires a subsequent approval, the Environmental Review Officer (or his or her designee) must determine whether the proposed change constitutes a substantial modification of that project. This checklist shall be used to determine whether the proposed changes to the approved project would constitute a "substantial modification" and, therefore, be subject to additional environmental review pursuant to CEQA.

PROPERTY INFORMATION/PROJECT DESCRIPTION

Project Address (If different than front page)		Block/Lot(s) (If different than front page)
Case No.	Previous Building Permit No.	New Building Permit No.
Plans Dated	Previous Approval Action	New Approval Action
Modified Project Description:		

DETERMINATION IF PROJECT CONSTITUTES SUBSTANTIAL MODIFICATION

Compared to the approved project, would the modified project:	
☐	Result in expansion of the building envelope, as defined in the Planning Code;
☐	Result in the change of use that would require public notice under Planning Code Sections 311 or 312;
☐	Result in demolition as defined under Planning Code Section 317 or 19005(f)?
☐	Is any information being presented that was not known and could not have been known at the time of the original determination, that shows the originally approved project may no longer qualify for the exemption?
If at least one of the above boxes is checked, further environmental review is required	**CATEX FORM**

DETERMINATION OF NO SUBSTANTIAL MODIFICATION

☐	The proposed modification would not result in any of the above changes.

If this box is checked, the proposed modifications are categorically exempt under CEQA, in accordance with prior project approval and no additional environmental review is required. This determination shall be posted on the Planning Department website and office and mailed to the applicant, City approving entities, and anyone requesting written notice.

Planner Name:	Signature or Stamp:

Attachment C

STATE WATER RESOURCES CONTROL BOARD

GEOTRACKER

CASE SUMMARY

REPORT DATE
1/2/1965

HAZARDOUS MATERIAL INCIDENT REPORT FILED WITH OES?

I. REPORTED BY -
UNKNOWN

CREATED BY
UNKNOWN

II. RESPONSIBLE PARTY -
UNKNOWN

III. SITE LOCATION

FACILITY NAME
SFFD #16

FACILITY ID

FACILITY ADDRESS
2251 Greenwich Street
San Francisco, CA 94123
SAN FRANCISCO COUNTY

ORIENTATION OF SITE TO STREET

CROSS STREET

V. SUBSTANCES RELEASED / CONTAMINANT(S) OF CONCERN
GASOLINE

VI. DISCOVERY/ABATEMENT

DATE DISCHARGE BEGAN

DATE DISCOVERED	HOW DISCOVERED	DESCRIPTION
9/3/1987		

DATE STOPPED	STOP METHOD	DESCRIPTION

VII. SOURCE/CAUSE

SOURCE OF DISCHARGE

CAUSE OF DISCHARGE

DISCHARGE DESCRIPTION

VIII. CASE TYPE

CASE TYPE
Other Groundwater (uses other than drinking water)

IX. REMEDIAL ACTION

REMEDIAL ACTION	BEGIN DATE	END DATE	DESCRIPTION
NA	1/1/1965		

X. GENERAL COMMENTS

XI. CERTIFICATION

I HEREBY CERTIFY THAT THE INFORMATION REPORTED HEREIN IS TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE.

XII. REGULATORY USE ONLY

LOCAL AGENCY CASE NUMBER	REGIONAL BOARD CASE NUMBER
10169	38-0285

LOCAL AGENCY

CONTACT NAME	INITIALS	ORGANIZATION NAME	EMAIL ADDRESS
STEPHANIE CUSHING	SC	SAN FRANCISCO COUNTY LOP	stephanie.cushing@sfdph.org

ADDRESS
1390 MARKET STREET #210
SAN FRANCISCO, CA 94102

CONTACT DESCRIPTION

PHONE TYPE	PHONE NUMBER	EXTENSION
BUSINESS	(415)-252-3926	

REGIONAL BOARD

CONTACT NAME	INITIALS	ORGANIZATION NAME	EMAIL ADDRESS
VIC PAL	VP	SAN FRANCISCO BAY RWQCB (REGION 2)	vpal@waterboards.ca.gov

ADDRESS
1515 CLAY STREET, SUITE 1400
OAKLAND, CA 94612

CONTACT DESCRIPTION

PHONE TYPE	PHONE NUMBER	EXTENSION
office	(510)-622-2403	

City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH

Edwin M. Lee, Mayor
Barbara A. Garcia, MPA, Director of Health
Richard J. Lee, MPH, CIH, REHS
Acting Environmental Health Director

Attachment D

November 9, 2014

Gabriella Judd-Cirelli
Department of Public Works
30 Van Ness, 4th Floor
San Francisco, CA 94102

Subject: Fire Station No. 16 Renovation Project
2251 Greenwich Street, San Francisco
EHB-SAM Case Number: 1088

Dear Ms. Cirelli:

In accordance with Article 22A of the San Francisco Health Code and Section 106.3.2.4 of the Building Co.de, the San Francisco Department of Public Health, Environmental Health Branch- Site Assessment and Mitigation (EHB-SAM) has reviewed the following documents:

- Report of Groundwater Sampling Activities, Fire Station No. 16, 2251 Greenwich Street, San Francisco, prepared by Baseline Environmental, July 1997;
- Report of Groundwater Sampling Activities, Fire Station No. 16, 2251 Greenwich Street, San Francisco, prepared by Baseline Environmental, August 1997;
- Report of Groundwater Sampling Activities, Fire Station No. 16, 2251 Greenwich Street, San Francisco, prepared by Baseline Environmental, November 1997;
- Report of Groundwater Sampling Activities, Fire Station No. 16, 2251 Greenwich Street, San Francisco, prepared by Baseline Environmental, April 1998;
- Primary Record, 2251 Greenwich Street, February 2012;
- Environmental Characterization Report, Fire Station No. 16 Renovation Project, San Francisco Fire Department, prepared by AEW Engineering, November 2012;
- Geotechnical Investigation Report, Fire Station No. 16, 2251 Greenwich Street, San Francisco, prepared by San Francisco Department of Public Works Infrastructure Design and Construction, December 2012; and
- LOP files for UST closure- in-place

The project includes the demolition and construction of a new fire station at the above address. In August through October 2011, AEW Engineering installed 3 soil borings at the site to characterize soil for disposal. Soil and groundwater samples were collected. Soil borings were installed to 56 feet below ground surface (bgs). Groundwater was found at 20 feet bgs.
Soil samples were sampled for Total petroleum hydrocarbons as gasoline (TPHg), Total petroleum hydrocarbons as diesel (TPHd) and motor oil (TPHmo), Volatile Organic Compounds (VOCs), Semi-

Volatile Organic Compounds (SVOCs),-Organochlorine Pesticides, Organochlorine Herbicides, Polychlorinated Biphenyls (PCBs), CAM 17, Title 22 Metals, and Asbestos.

Groundwater samples are to be analyzed for:

TPHg, TPHd, TPHmo, VOCs, SVOCs, , PCBs, CAM 17 Title 22 metals, Total Recoverable Oil and Grease (TOG), Total Suspended Solids, Chemical Oxygen Demand, pH, Total Cyanide, Flash Point, and Dissolved Sulfide.

Results indicated that TPH-g ranged from not detected (ND) to 1.3 ppm, TPH-d ranged from ND to 2.3 ppm, TPH-m.o. ranged from ND to 7.8 ppm, benzene, toluene, ethylbenzene and xylenes (BTEX) were ND, methyl tertiary butyl ether was ND, asbestos, VOCs and SVOCs were ND. Antimony, cadmium, mercury, molybdenum, selenium, silver, and thallium were ND. Arsenic ranged from 2.2 to 4.4 ppm, barium ranged from 46 to 100 ppm, chromium ranged from 68 to 110 ppm, cobalt ranged from 7.2 to 11 ppm, copper ranged from 7.5 to 16 ppm, lead ranged from 2.3 to 4.7 ppm, nickel ranged from 48 to 72 ppm, vanadium ranged from 37 to 66 ppm and zinc ranged from 27 to 40 ppm.

AEW concluded that TPH-g, TPH-d, TPH-m.o. were below Regional Water Quality Control Board's (RWQCB) Environmental Screening Levels (ESLs). All metals were below ESLs. Only arsenic was above ESLs but representative of background concentrations.

In groundwater Oil and Greas was ND, pH was 7.37, cis-1,2-dichloehane was 0.033 ppm, trans-1,2-dichloroethane was 0.00085 ppm, tetrachloroethene was 0.0095 ppm, trichloroethene was 0.003 ppm, total dissolved solids (TSS) were 18100 ppb and chloride was 27 ppm. None of the levels were above San Francisco Public Utilities Commission batch discharge requirements.

Based on these results, AEW concluded that no soil remediation is required for the site. A Health and Safety plan to protect worker health and safety should be developed.

EHB-SAM finds that no further action with regards to SFHC Article 22A is required. However, usual construction dust control shall be enforced with the criteria of no visible dust. Should underground storage tanks be removed from the site, permits shall be obtained from the Hazardous Materials Unified Program Agency (HMUPA), San Francisco Fire Department (SFFD) and the Department of Public Works (DPW).

Should you have any questions, please contact me at (415) 252-3926.

Sincerely,

Stephanie K.J. Cushing, MSPH, CHMM, REHS
Principal Environmental Health Inspector

Cc: Ed Sweeney, DBI
Jessica Range, Planning
Stanley DeSouza, DPW BCM-SAR

Carroll, John (BOS)

From: SF Docs (LIB)
Sent: Tuesday, May 05, 2015 1:46 PM
To: BOS Legislation, (BOS)
Subject: Re: Please Post the Attached Hearing Notices

Hi John,

I have posted the hearing notices.

Thank you,

Michael

From: BOS Legislation, (BOS)
Sent: Tuesday, May 5, 2015 1:36 PM
To: SF Docs (LIB)
Cc: BOS Legislation, (BOS)
Subject: Please Post the Attached Hearing Notices

Good afternoon,

Please kindly post the attached hearing notices.

File No. 140767 - Public Hearing - Appeal of Categorical Exemption from Environmental Review - 2251 Greenwich Street - Fire Station No. 16

File No. 150395 - Public Hearing - Appeal of Categorical Exemption from Environmental Review - 26 Hodges Alley

Thanks!

John Carroll
Legislative Clerk
Board of Supervisors
San Francisco City Hall, Room 244
San Francisco, CA 94102
(415)554-4445 - Direct | (415)554-5163 - Fax
john.carroll@sfgov.org | bos.legislation@sfgov.org

Click here to complete a Board of Supervisors Customer Service Satisfaction form.

The Legislative Research Center provides 24-hour access to Board of Supervisors legislation, and archived matters since August 1998.

Carroll, John (BOS)

From:	BOS Legislation, (BOS)
Sent:	Tuesday, May 05, 2015 11:40 AM
To:	'Stephen M. Williams'; Givner, Jon (CAT); Stacy, Kate (CAT); Byrne, Marlena (CAT); Sanchez, Scott (CPC); Jones, Sarah (CPC); Rodgers, AnMarie (CPC); Starr, Aaron (CPC); Tam, Tina (CPC); Range, Jessica (CPC); Ionin, Jonas (CPC); Storrs, Bruce (DPW); Rahaim, John (CPC); Cirelli, Gabriella (DPW); De Freitas, Paul (DPW); BOS-Supervisors; BOS-Legislative Aides
Cc:	Calvillo, Angela (BOS); Caldeira, Rick (BOS); BOS Legislation, (BOS); Carroll, John (BOS); Lamug, Joy (BOS)
Subject:	Appeal of Categorical Exemption Determination - 2251 Greenwich Street - Fire Station No. 16 - Hearing Notice

Good morning,

The Office of the Clerk of the Board has scheduled an appeal hearing for a Special Order before the Board on **May 19, 2015, at 3:00 p.m.**

Please find linked below the Hearing Notice for the appeal of categorical exemption from environmental review under the California Environmental Quality Act for the proposed project at 2251 Greenwich Street, also known as Fire Station No. 16.

Hearing Notice – 2251 Greenwich Street

You are invited to review the entire matter on our Legislative Research Center by following the link below.

Board of Supervisors File No. 140767

Thank you,

John Carroll
Legislative Clerk
Board of Supervisors
San Francisco City Hall, Room 244
San Francisco, CA 94102
(415)554-4445 - Direct | (415)554-5163 - Fax
john.carroll@sfgov.org | bos.legislation@sfgov.org

Click here to complete a Board of Supervisors Customer Service Satisfaction form.

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BOARD of SUPERVISORS

City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco 94102-4689
Tel. No. 554-5184
Fax No. 554-5163
TDD/TTY No. 544-5227

PROOF OF MAILING

Legislative File No. 140767 - Hearing Notice to Appellant

Description of Items:

I, John Carroll, an employee of the City and County of San Francisco, mailed the above described document(s) by depositing the sealed items with the United States Postal Service (USPS) with the postage fully prepaid as follows:

Date: 5/5/2015

Time: 8:25 a.m.

USPS Location: Clerk's Office USPS Dropoff

Mailbox/Mailslot Pick-Up Times (if applicable): Picked up @ 9:30 a.m. by Ahmed

Signature:

Instructions: Upon completion, original must be filed in the above referenced file.

BOARD of SUPERVISORS

City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco 94102-4689
Tel. No 554-5184
Fax No. 554-5163
TTD/TTY No. 5545227

NOTICE OF PUBLIC HEARING

BOARD OF SUPERVISORS OF THE CITY AND COUNTY OF SAN FRANCISCO

NOTICE IS HEREBY GIVEN THAT the Board of Supervisors of the City and County of San Francisco will hold a public hearing to consider the following proposal and said public hearing will be held as follows, at which time all interested parties may attend and be heard:

Date: **Tuesday, May 19, 2015**

Time: **3:00 p.m.**

Location: **City Hall, 1 Dr. Carlton B. Goodlett Place, Legislative Chamber, Room 250, San Francisco, CA 94102**

Subject: **File No. 150395.** Hearing of persons interested in or objecting to the determination of categorical exemption from environmental review under the California Environmental Quality Act issued by the Planning Department on September 18, 2014, for the proposed project at 26 Hodges Alley. (District 3) (Appellant: Melody Mar) (Filed April 10, 2015).

In accordance with Administrative Code, Section 67.7-1, persons who are unable to attend the hearing on this matter may submit written comments to the City prior to the time the hearing begins. These comments will be made part of the official public record in this matter, and shall be brought to the attention of the members of the Board. Written comments should be addressed to Angela Calvillo, Clerk of the Board, City Hall, 1 Dr. Carlton Goodlett Place, Room 244, San Francisco, CA 94102. Information relating to this matter is available in the Office of the Clerk of the Board. Agenda information relating to this matter will be available for public review on Friday, May 15, 2015.

Angela Calvillo
Clerk of the Board

DATED: **May 5, 2015**
MAILED/POSTED: **May 5, 2015**

BOARD of SUPERVISORS

City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689
Tel. No. 554-5184
Fax No. 554-5163
TDD/TTY No. 544-5227

April 10, 2015

Stephen M. Williams
Law Offices of Stephen M. Williams
On behalf of Brent McMicking and Evan Kletter
1934 Divisadero Street
San Francisco, CA 94115

Subject: Appeal of the Categorical Exemption Determination - 2251 Greenwich Street - Fire Station No. 16

Dear Mr. Williams:

The Office of the Clerk of the Board is in receipt of a memo dated March 16, 2015, (copy attached), from the Planning Department regarding the timely filing of your appeal of the categorical exemption determination from environmental review for 2251 Greenwich Street - Fire Station No. 16.

The Planning Department has determined that the appeal was filed in a timely manner.

The appeal filing period closed on Thursday, April 9, 2015. Pursuant to Administrative Code, Section 31.16, a hearing date has been scheduled for **Tuesday, May 19, 2015, at 3:00 p.m.**, at the Board of Supervisors meeting to be held in City Hall, 1 Dr. Carlton B. Goodlett Place, Legislative Chamber, Room 250, San Francisco, CA 94102.

Please provide to the Clerk's Office by 12:00 noon:

20 days prior to the hearing: names and addresses of interested parties to be notified of the hearing, in spreadsheet format; and

11 days prior to the hearing: any documentation which you may want available to the Board members prior to the hearing.

For the above, the Clerk's office requests one electronic file sent to bos.legislation@sfgov.org, and one hard copy of the documentation for distribution.

NOTE: If electronic versions of the documentation are not available, please submit 18 hard copies of the materials to the Clerk's Office for distribution. If you are unable to make the deadlines prescribed above, it is your responsibility to ensure that all parties receive copies of the materials.

If you have any questions, please feel free to contact Legislative Clerks, Joy Lamug at (415) 554-7712, or John Carroll at (415) 554-4445.

Sincerely,

Angela Calvillo
Clerk of the Board

c: Jon Givner, Deputy City Attorney
Kate Stacy, Deputy City Attorney
Marlena Byrne, Deputy City Attorney
Scott Sanchez, Zoning Administrator, Planning Department
Sarah Jones, Environmental Review Officer, Planning Department
AnMarie Rodgers, Planning Department
Aaron Starr, Planning Department
Tina Tam, Planning Department
Jessica Range, Planning Department
Jonas Ionin, Planning Department
Bruce Storrs, Public Works
Gabriella Judd Cirelli, Public Works
Paul de Freitas, Public Works

BOARD of SUPERVISORS

City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689
Tel. No. 554-5184
Fax No. 554-5163
TDD/TTY No. 544-5227

March 18, 2015

Stephen M. Williams
Law Offices of Stephen M. Williams
On behalf of Brent McMicking and Evan Kletter
1934 Divisadero Street
San Francisco, CA 94115

Subject: Appeal of the Categorical Exemption Determination - 2251 Greenwich Street - Fire Station No. 16

Dear Mr. Williams:

The Office of the Clerk of the Board is in receipt of a memo dated March 16, 2015, (copy attached) from the Planning Department regarding the timely filing of your appeal of the Categorical Exemption Determination for 2251 Greenwich Street - Fire Station No. 16.

The Planning Department has determined that the appeal was filed in a timely manner. The Office of the Clerk of the Board will schedule your appeal after the appeal filing period closes on April 9, 2015.

If you have any questions, please feel free to contact Legislative Clerks Joy Lamug at (415) 554-7712, or John Carroll at (415) 554-4445.

Very truly yours,

Angela Calvillo
Clerk of the Board

c: Jon Givner, Deputy City Attorney
Kate Stacy, Deputy City Attorney
Marlena Byrne, Deputy City Attorney
Scott Sanchez, Zoning Administrator, Planning Department
Sarah Jones, Environmental Review Officer, Planning Department
AnMarie Rodgers, Planning Department
Aaron Starr, Planning Department
Tina Tam, Planning Department
Jessica Range, Planning Department
Jonas Ionin, Planning Department
Bruce Storrs, Public Works
Gabriella Judd Cirelli, Public Works
Paul de Freitas, Public Works

SAN FRANCISCO
PLANNING DEPARTMENT

MEMO

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

DATE: March 16, 2015

TO: Angela Calvillo, Clerk of the Board of Supervisors

FROM: Sarah B. Jones, Environmental Review Officer

RE: CEQA Appeal for 2251 Greenwich Street, San Francisco Fire Station No. 16

An appeal of the Categorical Exemption issued for the proposed project at 2251 Greenwich Street (San Francisco Fire Station No. 16) was filed with the Office of the Clerk of the Board on July 2, 2014, by Stephen Williams. The appeal is now timely and the appeal hearing can be scheduled by the Clerk of the Board between April 30, 2015 and May 25, 2015 in accordance with Section 31.16(b)(4) of the San Francisco Administrative Code.

Timeline: A Categorical Exemption was issued for the project on January 23, 2013. On April 10, 2014, Mr. Williams informed the Planning Department of concerns regarding issuance of the Categorical Exemption due to potential environmental effects from hazardous materials. The Planning Department reissued the Categorical Exemption on June 2, 2014, addressing these concerns. The June Categorical Exemption identified the Approval Action as issuance of the Building Permit by the Department of Building Inspection. An appeal of the Categorical Exemption was filed on July 2, 2014. At that time, the Planning Department determined that because the Approval Action had not yet occurred, the appeal could not be scheduled.[1]

A Building Permit was issued for this project on February 12, 2015. Pursuant to Section 31.08(g), the 30-day appeal period shall begin on the first day of posting on the Planning Department's website. The Planning Department posted the required notice on March 10, 2015, following notice of approval of the Building Permit by the Department of Public Works on March 10, 2015. Therefore, the appeal period for this categorical exemption is March 10, 2015 through the close of business April 9, 2015.

Appeal Hearing: Section 31.16(b)(4) of the San Francisco Administrative Code states that the Clerk of the Board shall schedule the appeal hearing no less than 21 days and no more than 45 days following expiration of the specified time period for filing of the appeal, or between April 30, 2015 and May 25, 2015 for this project. Please schedule the Board of Supervisors CEQA appeal hearing and notify the appellant of acceptance of the CEQA appeal pursuant Section 31.16 of the San Francisco Administrative Code.

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[1] Memorandum Re: *Appeal Timeliness determination- 2251 Greenwich Street* from Sarah B. Jones to Angela Calvillo, July 7, 2014. This document is on file and available for public review at the San Francisco Planning Department, 1560 Mission Street, Suite 400 as part of Planning Department Case File No. 2012.1443E.

c: Jon Givner, Deputy City Attorney
Kate Stacy, Deputy City Attorney
Marlena Byrne, Deputy City Attorney
Scott Sanchez, Zoning Administrator, Planning Department
Sarah Jones, Environmental Review Officer, Planning Department
AnMarie Rodgers, Planning Department
Aaron Starr, Planning Department
Tina Tam, Planning Department
Jessica Range, Planning Department
Jonas Ionin, Planning Department
Bruce Storrs, Department of Public Works
Gabriella Judd Cirelli, Department of Public Works
Paul de Freitas, Department of Public Works

SAN FRANCISCO
PLANNING DEPARTMENT

MEMO

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

DATE: July 7, 2014

TO: Angela Calvillo, Clerk of the Board of Supervisors

FROM: Sarah B. Jones, Environmental Review Officer

RE: Appeal timeliness determination – 2251 Greenwich Street

An appeal of the Categorical Exemption issued for the proposed project at 2251 Greenwich Street (San Francisco Fire Station #16) was filed with the Office of the Clerk of the Board on July 2, 2014, by Stephen Williams.

Timeline: A Categorical Exemption was issued for the project on January 23, 2013. On April 10, 2014, Mr. Williams informed the Planning Department of concerns regarding issuance of the Categorical Exemption due to potential environmental effects from hazardous materials. The Planning Department reissued the Categorical Exemption on June 2, 2014, addressing these concerns. The June Categorical Exemption identified the Approval Action as issuance of the Building Permit by the Department of Building Inspection. This Approval Action has not yet occurred and the Date of the Approval Action, as defined in Section 31.04(h) of the San Francisco Administrative Code, is not known at this time. An appeal of the Categorical Exemption was filed on July 2, 2014.

Timeliness Determination: Section 31.16(a) and (e) of the San Francisco Administrative Code states that any person or entity may appeal an exemption determination to the Board of Supervisors during the time period beginning with the date of the exemption determination and ending 30 days after the Date of the Approval Action. Since the Date of the Approval Action is unknown at this time, it is not possible for the Clerk to schedule the appeal hearing. At such time as the Approval Action occurs, the Planning Department will notify the Clerk so that the appeal hearing may be scheduled. Section 31.16(b)(4) of the San Francisco Administrative Code states that the Clerk of the Board shall schedule the appeal hearing no less than 21 days and no more than 45 days following expiration of the specified time period for filing of the appeal.

BOARD of SUPERVISORS

City Hall
Dr. Carlton B. Goodlett Place, Room 244
San Francisco 94102-4689
Tel. No. 554-5184
Fax No. 554-5163
TDD/TTY No. 544-5227

July 2, 2014

To: John Rahaim
Planning Director

From: Rick Caldeira
Legislative Deputy Director

Subject: Appeal of Categorical Exemption Determination - 2251 Greenwich Street Firehouse No. 16

An appeal of the CEQA Categorical Exemption Determination issued for property located at 2251 Greenwich Street was filed with the Office of the Clerk of the Board on July 2, 2014, by Stephen M. Williams, on behalf of Brent McMicking and Evan Kletter.

Pursuant to Administrative Code, Chapter 31, Procedures for Appeals of Categorical Exemption Determinations, I am forwarding this appeal, with attached documents, to the Planning Department's Office to determine if the appeal has been filed in a timely manner. The Planning Department's determination should be made within three (3) working days of receipt of this request.

If you have any questions, you can contact me at (415) 554-7711.

c: Angela Calvillo, Clerk of the Board
Kate Stacy, Deputy City Attorney
Marlena Byrne, Deputy City Attorney
Scott Sanchez, Zoning Administrator, Planning Department
Sarah Jones, Environmental Review Officer, Planning Department
AnMarie Rodgers, Planning Department
Aaron Starr, Planning Department
Tina Tam, Planning Department
Jessica Range, Planning Department
Jonas Ionin, Planning Department
Bruce Storrs, Department of Public Works

File 140 Ker
2211 Greenwich
Fire station 16
CEQA Appeal

Name	Organization	Address 1	Address 2
Stephen Williams	Law offices of Stephen M. Williams	1934 Divisadero Street	

City, State, Zip	email
San Francisco, CA 94115	smw@stevewilliamslaw.com

BOARD of SUPERVISORS

City Hall
Dr. Carlton B. Goodlett Place, Room 244
San Francisco 94102-4689
Tel. No. 554-5184
Fax No. 554-5163
TDD/TTY No. 544-5227

April 14, 2015

FILE NO. 140767

Received from the Board of Supervisors-Clerk's Office a check in the amount of Five Hundred Thirty Four Dollars ($534), representing filing fee paid by Stephen Williams on behalf of Brent McMicking and Evan Kletter (Appellants), for the Appeal of CEQA Exemption Determination for 2251 Greenwich Street – Fire Station No. 16.

Planning Department
By:

Josephine Chen
Print Name

04/14/15
Signature and Date

Print Form

Introduction Form

By a Member of the Board of Supervisors or the Mayor

Time stamp or meeting date 5/12/15

I hereby submit the following item for introduction (select only one):

☐ 1. For reference to Committee. (An Ordinance, Resolution, Motion, or Charter Amendment)

☐ 2. Request for next printed agenda Without Reference to Committee.

☒ 3. Request for hearing on a subject matter at Committee.

☐ 4. Request for letter beginning "Supervisor [ ] inquires"

☐ 5. City Attorney request.

☐ 6. Call File No. [ ] from Committee.

☐ 7. Budget Analyst request (attach written motion).

☐ 8. Substitute Legislation File No. [ ]

☐ 9. Reactivate File No. [ ]

☐ 10. Question(s) submitted for Mayoral Appearance before the BOS on [ ]

Please check the appropriate boxes. The proposed legislation should be forwarded to the following:

☐ Small Business Commission ☐ Youth Commission ☐ Ethics Commission

☐ Planning Commission ☐ Building Inspection Commission

Note: For the Imperative Agenda (a resolution not on the printed agenda), use a Imperative Form.

Sponsor(s):

Clerk of the Board

Subject:

Public Hearing - Appeal of Categorical Exemption from Environmental Review - 2251 Greenwich Street - Fire Station No. 16

The text is listed below or attached:

Hearing of persons interested in or objecting to the determination of categorical exemption from environmental review under the California Environmental Quality Act issued by the Planning Department on June 2, 2014, for the proposed project at 2251 Greenwich Street known as Fire Station No. 16. (District 2) (Appellant: Stephen Williams, on behalf of Brent McMicking and Evan Kletter) (Filed July 2, 2014).

Signature of Sponsoring Supervisor: [ ]

For Clerk's Use Only:

140767