

BOARD of SUPERVISORS



City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689
Tel. No. (415) 554-5184
Fax No. (415) 554-5163
TDD/TTY No. (415) 554-5227

MEMORANDUM

Date: August 8, 2025
To: Planning Department/Planning Commission
From: John Carroll, Assistant Clerk, Land Use and Transportation Committee
Subject: Board of Supervisors Legislation Referral - File No. 250823
Planning Code, Zoning Map - 1236 Carroll Avenue

- California Environmental Quality Act (CEQA) Determination
(*California Public Resources Code, Sections 21000 et seq.*)
 - Ordinance / Resolution
 - Ballot Measure

CEQA clearance under Addendum 1 to Mitigated Negative Declaration for San Francisco Fire Department Training Facility/1236 Carroll Avenue Project. Planning Department Case No 2021-004847ENV-02, issued June 4, 2021. *Joy Navarrete*
- Amendment to the Planning Code, including the following Findings:
(*Planning Code, Section 302(b): 90 days for Planning Commission review*)
 - General Plan
 - Planning Code, Section 101.1
 - Planning Code, Section 302
- Amendment to the Administrative Code, involving Land Use/Planning
(*Board Rule 3.23: 30 days for possible Planning Department review*)
- General Plan Referral for Non-Planning Code Amendments
(*Charter, Section 4.105, and Administrative Code, Section 2A.53*)
(Required for legislation concerning the acquisition, vacation, sale, or change in use of City property; subdivision of land; construction, improvement, extension, widening, narrowing, removal, or relocation of public ways, transportation routes, ground, open space, buildings, or structures; plans for public housing and publicly-assisted private housing; redevelopment plans; development agreements; the annual capital expenditure plan and six-year capital improvement program; and any capital improvement project or long-term financing proposal such as general obligation or revenue bonds.)
- Historic Preservation Commission
 - Landmark (*Planning Code, Section 1004.3*)
 - Cultural Districts (*Charter, Section 4.135 & Board Rule 3.23*)
 - Mills Act Contract (*Government Code, Section 50280*)
 - Designation for Significant/Contributory Buildings (*Planning Code, Article 11*)

Please send the Planning Department/Commission recommendation/determination to John Carroll at john.carroll@sfgov.org.



ADDENDUM 1 TO MITIGATED NEGATIVE DECLARATION

Date of Publication of Addendum: June 4, 2025
Date of Publication of Final MND: December 30, 2021
Case No.: **2021-004847ENV-02**
Project Title: **San Francisco Fire Department Training Facility/1236 Carroll Avenue**
Block/Lots: 4852/001, 002, 003, 004, 005, 006, 007, 008, 009, 010, 011, 012, 013, 014, 015, 016, 017, 018, 019, 020, 021, 022 and 4877/001, 002, 003, 004
Project Sponsor: San Francisco Fire Department
c/o Scott Moran, San Francisco Public Works – (628) 271-2838
scott.moran@sfdpw.org
Lead Agency: San Francisco Planning Department
Staff Contact: Josh Pollak – (628) 652-7493
josh.pollak@sfgov.org

REMARKS

Previously Approved Project

A final mitigated negative declaration (FMND), file number 2021-004874ENV, for the subject project (previously approved project) was adopted and issued on December 30, 2021.¹ The project site encompasses two city blocks bounded by Carroll Avenue, Hawes Street, Armstrong Avenue, and Griffith Street in the Bayview Hunters Point neighborhood. The San Francisco Department of Public Works acting on behalf of the San Francisco Fire Department (fire department or project sponsor) proposed to acquire the property and construct a new fire-training facility that would consolidate and replace the San Francisco Fire Department’s current training facilities at 19th and Folsom streets and on Treasure Island. The undeveloped “paper streets”² of Bancroft Avenue, which bisects the project site between Hawes and Griffith streets, and Griffith Street between Carroll Avenue and Armstrong Avenue, would have been vacated and the parcels would have been merged to form a 7.28 acre (317,300 square foot) contiguous parcel, which is the project site. Following acquisition of the property, the project sponsor proposed to develop detailed plans for the project site and would seek project approvals, including a zoning text and map amendment for the project site.

¹ San Francisco Planning Department, *San Francisco Fire Department Training Facility/1236 Carroll Avenue Final Mitigated Negative Declaration*, Planning Department Case No. 2021-004847ENV, State Clearinghouse No. 2021110196, adopted February 8, 2022. Available online at: https://sfplanning.org/environmental-review-documents?title=&field_environmental_review_categ_target_id=212&items_per_page=25 accessed December 2024.

² A “paper street” is a street or road that has been planned or mapped but has not been physically built, and only exists on a plan or “paper.”

Fire-training facilities would have included a three-story, 50-foot-tall, approximately 70,000-square-foot administration building; a one-story, 50-foot-tall, approximately 27,000-square-foot apparatus building; and a one-story, 40-foot-tall, approximately 19,200-square-foot maintenance building. Fire training activities on site would have comprised classroom instruction and training exercises involving controlled burns³ and simulated rescue operations at prop structures⁴, including a seven-story, 110-foot-tall training tower, a four-story, 60-foot-tall condo/apartment-style building, and several structures and pieces of equipment up to 40 feet tall, including a Victorian house, a commercial prop burn room, a container burn room, a mock BART station, a vehicle fire prop, an apparatus training hill with slopes and conditions similar to many San Francisco streets, and other simulation props. The proposed project would have required a combination of excavation and soil compaction and stabilization to a depth of 20 feet across the project site, resulting in approximately 17,000 cubic yards of excavation. The proposed project would have been constructed over a 30-month period.

Proposed Project Revisions

Subsequent to the issuance of the FMND, the project sponsor revised the proposed project design (revised project). The revised project differs from the previously approved project analyzed in the FMND in that the project site is approximately 10 percent larger in area. In addition, the proposed training facility buildings would be reduced in height and total square footage, and different live-fire structures would be constructed for training activities. Both of these revisions are discussed in more detail below. The total construction period would increase from 30 months to 34 months, and ground improvements would occur over a larger area, but with the same total amount of excavation (17,000 cubic yards). The revised project would require planning code map amendments to change the zoning from a combination of PDR-2 (Production, Distribution and Repair) and P (Public) use districts to all P use districts, and a height and bulk change from 40-X to 90-X. The revised project is described in detail below.

The revised project would expand the project site to include the undeveloped “paper street” of Hawes Street between Carroll Avenue and Armstrong Avenue, which would expand the lot size from 317,300 square feet (7.28 acres) to 349,440 square feet (8.02 acres) (see **Figure 1: Revised Project Parcel Map** below).

The revised fire-training facility would include the following four buildings:

- A two-story (50-foot-tall), approximately 35,000-square-foot Fire-Training and Administration Building for classroom instruction and administrative functions. The building would be reduced in floors from three stories (same height) and area from 70,000 square feet compared to the previously approved project;
- A one-story (24-foot-tall), approximately 12,000-square-foot building not in the previously proposed project on the southern portion of the site, would serve as the Fire and Emergency Medical Services (EMS) support building. It would house “dirty” classrooms, which trainees can

³ Controlled burns are the intentional burning of measured amounts of fuel within designated, contained areas under controlled conditions.

⁴ Prop structures are physical, fireproof simulations of buildings and structures used to simulate conditions that require rescue operations.

enter after using props without having to do a full washing/cleaning, and support functions including restrooms, lockers, showers, and equipment-cleaning rooms;

- A one-story (26-foot-tall), approximately 9,000-square-foot Apparatus Building for the storage of fire trucks, fire engines, ambulances, and other equipment used for training purposes. The apparatus building would be reduced in size from 50 feet and 27,000 square feet from the previously approved project, and would include five vehicle bays (one additional from the four in the previously approved project) on the north side of the building. The revised project would also construct one above-ground, 10,000-gallon steel split-fuel oil tank (8,000 gallons of diesel and 2,000 gallons gasoline) in close proximity to the apparatus building. The split-fuel tank would support apparatus refueling and an emergency generator. The previously approved project proposed two underground tanks; and
- A one-story (24-foot-tall), approximately 7,000-square-foot shop/maintenance building that would include metalworking and woodworking shops for the construction and maintenance of training props. The maintenance building would be reduced in height from 40 feet tall and 19,200 square feet from the previously approved project.

The revised project includes a tower and on-site structures and props to be used for fire-training activities involving controlled burns and simulated rescue operations. To support this training, the revised project would include two metal 2,000-gallon propane tanks near the training structures, which would store propane used in some live-fire burn exercises. A concrete pad near the training structures would support several storage containers for materials and supplies needed for live-fire training exercises. The revised project would have a total of seven fire training structures, the same number as the previously approved project. Live-fire and simulated rescue operations would occur in the following training structures and props for the revised project:

- A seven-story (84-foot-tall) training tower that would be 58 feet wide and 36 feet deep⁵. In the previously approved project, the training tower was 110 feet tall (seven-stories), 40 feet wide, and 40 feet deep;
- An 80-foot-tall, simulated communications tower, which would be 10 feet wide and 10 feet deep. This prop has been added as part of the revised project;
- A four-story (56-foot-tall) simulated commercial-residential building, which would be 66 feet wide, and 55 feet deep. In the previously approved project, this structure was a simulated condominium/apartment building that was 60 feet tall, 50 feet wide, and 40 feet deep;
- A four-story (54-foot tall) simulated earthquake-damaged structure, which would be 94 feet wide, and 56 feet deep. Under the previously approved project, this prop structure was 20 feet tall, 40 feet wide, and 32 feet deep;

⁵ “Deep” in the context of the buildings described in the list refers to horizontal depth, as opposed to depth below ground surface.

- A four-story (48-foot-tall) simulated apartment building, which would be 25 feet wide and 40 feet deep. This prop structure has been added as part of the revised project;
- A three-story (32-foot tall) simulated three-unit, hillside residential building, which would be 25 feet wide and 50 feet deep. Under the previously approved project, this structure was 40 feet tall, 35 feet wide, and 20 feet deep;
- An assortment of props and training structures (up to 40 feet tall), which would include additional simulated residential buildings, a vehicle-fire prop, and an apparatus-training "hill" (built up streets simulating natural hills).
- The revised project removes the previously proposed use of live-fire from the use of the ventilation prop (a simulated roof structure used for firefighters to train in the use of chainsaws to cut holes in the roof safely and effectively).

Figures 2 and 3 (below) show the revised project’s site plan, the locations of these buildings, facilities, and props, with renderings of the revised project as seen from various representative viewpoints. **Table 1** (below) shows a comparison of the key characteristics of the previously approved project with those of the revised project.

Table 1: Key Project Feature Comparison Between Previously Approved Project and Revised Project

FEATURE	PREVIOUSLY APPROVED PROJECT	REVISED PROJECT
Project Site Area	7.28 acre	8.02 acre
Training and Administration Building	Three-story (50-foot-tall), 70,000-square-foot building	Two-story (50-foot-tall), 35,000-square-foot building
Support Building	Not included	One-story (24-foot-tall), 12,000-square-foot building
Apparatus Training and Storage Building	One-story (50-foot-tall), 27,000-square-foot building	One-story (26-foot-tall), 9,000-square-foot building
Shop/Maintenance Building	One-story (40-foot-tall), 19,200-square-foot building	One-story (24-foot-tall), 7,000-square-foot building

FEATURE	PREVIOUSLY APPROVED PROJECT	REVISED PROJECT
Prop Buildings for Training	<ul style="list-style-type: none"> • A seven-story (110-foot-tall) training tower • A four-story (60-foot-tall) condo apartment style building • Several structures and equipment up to 40 feet tall, including a Victorian house, a commercial prop burn room, a container burn room, a mock BART station, a vehicle fire prop, an apparatus training “hill,” and other simulation props 	<ul style="list-style-type: none"> • A seven-story (84-foot-tall) training tower • An 80-foot-tall, simulated communications tower (Added) • A four-story (56-foot-tall) commercial-residential building • A four-story (54-foot tall) simulated earthquake damaged structure (added) • A four-story (48-foot tall) simulated 3-unit, hillside residential building (added) • Several structures and equipment up to 40 feet tall, including a Victorian house, other residential buildings, a vehicle fire prop, an apparatus training “hill,” and other simulation props
Parking (Vehicle and Bicycle)	116 vehicular parking spaces, 10 class 1 and 4 class 2 bicycle parking spaces	116 vehicular parking spaces, 10 class 1 and 4 class 2 bicycle parking spaces
Construction Timeline	Constructed over a 30-month period, beginning in approximately June 2024 and finishing December 2026	Constructed over a 34-month period, beginning in approximately October 2025 and finishing August 2028

Parking and Site Circulation

The revised project would include a total of 116 vehicle parking spaces, which is the same as the previously approved project. Parking would be allocated as follows: 94 vehicles in the main lot in the northeast portion of the site, 17 vehicles adjacent to the administration building, and surface parking for five vehicles along the eastern frontage for visitors. As in the previously approved project, there would be 12 electric-vehicle charging stations, 10 class 1 and 4 class 2 spaces for bicycle parking, and landscaping and ornamental screening of the parking and vehicular use areas.

The previously approved project proposed changes in the public right-of-way for Hawes Street and Carroll Avenue. The previously approved project would have constructed a portion of Hawes Street, which is currently a paper street. A two-way access driveway on Hawes Street would have been the primary entrance and exit for the previously approved project. Carroll Avenue would have two new exit-only driveway added for fire-apparatus and in-service-vehicle circulation only.

The revised project would have two driveways providing access to the project site: a two-way driveway on Griffiths Street, which would be the primary entrance/exit with a stop sign for visitor/staff/in-service circulation, and an exit-only driveway on Hawes Street for fire-apparatus and general vehicle use. The revised project would include street paving, sidewalk and street tree improvements to Carroll Avenue following San Francisco's Better Streets Plan guidelines and in coordination with the future development plans approved for the Candlestick Point Development. The project does not include any improvements to Armstrong Avenue. Griffith Street, Bancroft Avenue, and Hawes Street would be vacated, and the streets would be incorporated into the project site.

Ground Improvements, Excavation, and Pile Installation

The revised project would include a retaining wall along most of the western edge of the site due to the grade difference of the adjacent property. Soil stabilized slopes and planting would be implemented at the northern edge of the site as it approaches Armstrong Avenue. The eastern edge of the project is generally at grade and does not require any earth-retention system. The previously approved project would have included a retaining wall along Armstrong Avenue, and the northern portions of Hawes Street and Griffith Street.

To construct foundations and ground improvements (which may include deep-soil mixing with cement, removal and recompaction of soils, and limited use of imported fill), the revised project would require a combination of excavation and ground improvements to a depth of up to 20 feet across the whole of project site, generating 17,000 cubic yards of excavated material. Most structures in the revised project would require deep foundations to a depth of up to 100 feet, depending on the size of the structure and the depth to the bedrock beneath. Types of deep foundations that may be used include drilled caissons, torque down steel pipe piles, auger-cast-in-place piles, driven H piles, or driven pre-cast concrete piles.⁶ Piles would typically be driven with vibratory hammers to the point of refusal⁷, and with impact hammers when otherwise required. For buildings and structures that are smaller in size and/or have shallower depth to bedrock below fill, shallow foundations (either a mat foundation, which is a large concrete slab that supports multiple columns or an entire structure by distributing the load over a broad area, or individual spread footings, which are widened bases placed beneath columns or walls to transfer building loads directly into the soil), combined with corrective grading and ground improvements such as densification, would be used. The previously approved project would have included a similar set of foundation and soil improvements.

The revised project would be constructed over a 34-month period, beginning in October 2025 and finishing in August 2028. Construction would occur during daytime hours (no nighttime construction).

⁶ Drilled caissons are a borehole filled with concrete, often with a rebar cage. Torque-down steel pipe piles are steel pipes screwed into soil using rotary torque. Auger-cast-in-place piles are a hollow-stem auger drills hole where grout is pumped in as auger is withdrawn. Driven H piles are steel I-beams with wide flanges driven into soil by impact. Driven pre-cast concrete piles are a factory-made concrete piles driven into place with a hammer.

⁷ Vibratory driving uses rapid vertical vibrations to reduce soil resistance and sink the pile, making it faster and quieter than impact driving, which uses repeated hammer blows to drive the pile. Impact driving generates more noise and vibration but achieves greater penetration in dense or resistant material. "Refusal" is the point in pile driving when the pile can no longer be driven further into the ground, typically because it has encountered a very dense layer, bedrock, or an obstruction

Site Operations

The revised project would include similar site operations to those of previously approved project. The fire-training facility would operate every day of the year except for standard holidays, and would host multiple activities each week, including fire in-service training, firefighter recruit training, emergency medical-service recruit training, emergency medical service in-service training, and meetings of community groups.

Training with live-fire props for academy and in-service training would take place up to 75 days per year. Training would occur during normal business hours (8 a.m. to 6 p.m.). During a live-fire training day, a maximum of 1,120 pounds of wood would be burned, while an average of 448 pounds of wood would be burned per live-fire training day. SFFD standards require that a live-fire evolution (full sequence of recommended procedures for fire-fighting operations) be conducted for each new firefighter (estimated 0 to 112 personnel annually) or for personnel on leave for periods longer than 180 days (estimated 0 to 25 personnel annually). During a typical live-fire evolution, the live-fire portion lasts from three to six minutes. An estimated 1,110 gallons of propane would be used in one training day. There would be a maximum of 10 wood-fueled live-fire events per day and 10 propane-fueled live-fire events per day.

Training at ventilation props would occur each day, but no smoke or heat would be used as part of the ventilation prop training, which would occur for up to 30 minutes per day. This is a change from the previously approved project, which assumed smoke would be used as part of the ventilation prop training.

Approvals

The project sponsor expects to seek approvals for the proposed fire-training facility, including but not limited to the following:⁸

- **San Francisco Port Commission**
 - Approval of the jurisdictional transfer of Port property.
- **San Francisco Board of Supervisors**
 - *Approval to vacate Griffith Street, Bancroft Avenue, and Hawes Street and to incorporate them into the project site.
 - Approval of the jurisdictional transfer of Port property.
- **San Francisco Planning Commission**
 - *Planning Code Text Amendment/Zoning Map Amendment to change zoning from a combination of PDR-2 (Production, Distribution, and Repair-2) and P (Public) to all P, and a height/bulk district change from 40-X to 90-X.
- **San Francisco Department of Building Inspection**
 - Approval of a new construction permit.
- **San Francisco Department of Public Health**

⁸ Approvals that have been added or updated since publication of the FMND are noted with a "*" prior to the approval action

- Approval of site mitigation plan and final project report or no further action letter in compliance with San Francisco Health Code article 22A (Maher Ordinance).
- *Local Enforcement Agency approval of a Postclosure Land Use plan due to the presence of a legacy disposal site in the project vicinity, if required.
- Construction dust control plan in compliance with San Francisco Health Code article 22B (Construction Dust Control Ordinance).
- *Registration under the state’s Aboveground Petroleum Storage Act (APSA) program for the fuel tank.
- **San Francisco Public Works**
 - Approval of street improvement permits.
 - *Approval of lot merging to lot merging to combine 26 parcels and three paper streets into one large parcel with common zoning (P) and bulk/height district (90-X) (Bureau of Surveying and Mapping)
 - Approval of street tree permit.
 - Approval of nighttime construction permit (San Francisco Police Code section 2908), if necessary.
- **San Francisco Municipal Transportation Agency**
 - Approval of street improvements.
 - *Approval of a special traffic permit from the Sustainable Streets Division if sidewalks are used for construction staging and pedestrian walkways are constructed in the curb lane(s).
- **San Francisco Public Utilities Commission**
 - *Approval of erosion and sediment control plan
 - Approval of connection to the existing combined sewer within Bancroft Street.
 - Approval of discharge permit for construction-period dewatering and discharge to the combined sewer system.
- **Actions by Other Government Agencies**
 - *Bay Area Air Quality Management District – approval of any necessary air quality permit for installing, operating, and testing (e.g., Authority to Construct/Permit to Operate) of individual air pollutant sources, such as the proposed emergency backup generator, and fuel tanks.
 - California State Lands Commission – approval of value of Port property for jurisdictional transfer.
 - California State legislation – approval of Port property for jurisdictional transfer.

Cumulative Setting

The FMND analyzed cumulative development projects within a quarter-mile radius of the projects site, for which the planning department had an application on file. The FMND described seven cumulative projects: Candlestick Point—Hunters Point Shipyard Phase II (Case No. 2007.0946E), 1313 Armstrong Avenue (Case No. 2020-010684ENV), 1353 Yosemite Avenue/2350 Ingalls Street/1401 Yosemite Avenue (Case No. 2016-008604ENV), 853 Jamestown Avenue (Case No. 2019-002743ENV), Yosemite Slough Wetland Restoration

Project (State Clearinghouse No. 2005122023), 1400 Carroll Avenue (Case No. 2019-012354ENV), and 2200-2250 Jennings Street (Case No. 2018-013944PRJ).

Since the publication of the FMND, the following two projects are no longer considered as part of the cumulative development pipeline:

- **853 Jamestown Avenue (Case No. 2019-002743ENV)** project has been completed; and
- **1400 Carroll Avenue (Case No. 2019-012354ENV)** application was cancelled in November 2024.

The following is an updated project added to the cumulative list:

- **1428 Yosemite Avenue (2024-010862ENV):** The proposed project would install eight single port electric vehicle charging stations for fleet use only.

Analysis of Potential Environmental Effects

Section 31.19(c)(1) of the San Francisco Administrative Code states that a revised project must be reevaluated and that, “If, on the basis of such reevaluation, the Environmental Review Officer determines, based on the requirements of CEQA, that no additional environmental review is necessary, this determination and the reasons therefor shall be noted in writing in the case record, and no further evaluation shall be required by this Chapter.”

CEQA Guidelines section 15164 provides for the use of an addendum to document the basis for a lead agency's decision not to require a subsequent EIR or negative declaration for a project that is already adequately covered in a previous negative declaration. An addendum to a negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

This addendum to the MND documents the environmental effects of the proposed modifications to the project described above and explains why the proposed modifications would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified environmental impacts, and would not require the adoption of any new or considerably different mitigation measures.

The FMND found that the previously approved fire-training facility would result in impacts that were either less than significant or less than significant with mitigation. As described above, the revised project proposes a fire-training facility on a slightly larger project site, with a reduction in total square footage of buildings and with different live-fire structures designed for training activities. Accounting for these changes, as documented in this addendum, the revised project would have similar effects to the original project.

As described further below, the revised project would neither result in new or different environmental impacts, substantially increase the severity of the previously identified environmental impacts, nor require new mitigation measures. No new information has emerged that would materially change the analyses or

conclusions set forth in the FMND. Therefore, the revised project would not change the analysis or conclusions previously reached in the FMND.

Land Use and Land Use Planning

The FMND found that the previously approved project would have no impact related to physically dividing an established community, as the project would not construct a physical barrier to neighborhood access. The previously approved project would not have conformed with the existing 40-X Height and Bulk District; however, a Special Use District was proposed to accommodate the proposed buildings' heights. The revised project would require a Zoning and Height Map Amendment, which is being undertaken by the project sponsor to accommodate the proposed buildings' heights.

Implementation of the previously approved project would not have altered the established street grid or permanently closed any streets or sidewalks. The revised project would include a reduction in square footage of the overall building footprint. The revised project would have a slightly larger project site that would include the portion of Hawes Street between Carroll Avenue and Armstrong Avenue, which, like the rest of the site, remains undeveloped and currently consists of ungraded soil fill and temporary fencing. This section of Hawes Street does not exist as an improved roadway. Because the revised project includes the Hawes Street right-of-way, there would be no access along this segment. This reflects existing conditions, as Hawes Street is a paper street and currently is not accessible. Therefore, the revised project would not introduce any new impediments to pedestrian or vehicular movement through the neighborhood.

Therefore, the land use impacts of the revised project would remain less than significant and the conclusions of the FMND stand.

Cultural Resources

There are no existing buildings or structures on the project site. The FMND determined that there are no known historical resources within the project site, and the property itself is not eligible for listing in the California Register, either individually or as a contributor to a potential historic district. The FMND found that the previously approved project would not result in a substantial adverse change in the significance of a historical resource. As the project site does not contain existing buildings or structures, and no historic districts have been identified in the area, this less-than-significant conclusion would be the same for the revised project.

The FMND found that the previously approved project would have had less-than-significant impacts with mitigation on archaeological resources. As the revised project would include the same 20-foot maximum depth of excavation, over a slightly larger area, with the same 17,500 cubic yards of excavation, the revised project would have a similar less-than-significant impact with mitigation,⁹ with implementation of Mitigation Measure M-CR-2, Archeological Testing Program. This measure requires that specific actions be taken to avoid any potentially significant adverse effect from the proposed project on buried or submerged

⁹ San Francisco Planning Department, *Environmental Planning Preliminary Archeological Review Memo for 1236 Carroll Avenue*, July 14, 2021. Revised October 18, 2021

historical resources, which include retaining a professional archeological consultant and developing an archeological testing program.

The FMND also found that the previously approved project would have a less-than-significant impact with mitigation on the disturbance of human remains, including those interred outside of formal cemeteries. With the implementation of Mitigation Measure M-CR-2, the revised project would also have a less-than-significant impact on previously unknown human remains.

The FMND also analyzed the cumulative impacts of the previously approved project. Project-related impacts on archeological resources and human remains are site-specific and generally limited to a project's construction area. The FMND determined that cumulative impacts of the project were less than significant with mitigation. As the revised project proposes soil disturbance over the entire project site, with the same depth of excavation and total volume as the previously approved project, the revised project would likewise result in less-than-significant cumulative impacts with the incorporation of the aforementioned mitigation measure, Mitigation Measure M-CR-2.

Tribal Cultural Resources

During the analysis of the previously approved project, pursuant to CEQA section 21080.3.1(d), on August 5, 2021, the planning department contacted Native American individuals and organizations for the San Francisco area, providing a description of the previously approved project and requesting comments on the identification, presence, and significance of tribal cultural resources in the project vicinity. During the 30-day comment period, one Native American tribal representative contacted the planning department to request consultation. Based on tribal consultation undertaken by the City and County of San Francisco in 2015 with Native American tribal representatives, in San Francisco, prehistoric archeological resources are presumed to be potential tribal cultural resources. The FMND found that the previously approved project's ground disturbance could result in a significant impact to prehistoric archeological resources, should any be encountered.

The revised project would also have the potential to encounter tribal cultural resources during soil disturbing activities, as it would include the same 20-foot maximum depth of excavation as was analyzed for the approved project, but over a slightly larger area, with the same 17,500 cubic yards of excavation. Any inadvertent damage to tribal cultural resources would be considered a significant impact.

Implementation of Mitigation Measure M-TCR-1, Tribal Cultural Resources Interpretive Program, would reduce potential adverse effects to tribal cultural resources to a less-than-significant level. As with the previously approved project, Mitigation Measure M-TCR-1 would require either preservation-in-place of the tribal cultural resources, if determined effective and feasible, or an interpretive program regarding the tribal cultural resources developed in consultation with affiliated Native American tribal representatives. With implementation of Mitigation Measures M-TCR-1, as described above, the revised project would have a less-than-significant impact on previously unknown tribal cultural resources. The revised project would also include Improvement Measure I-TCR-1, Local Native American Land Acknowledgment Program, which would design and install a plaque or other land acknowledgment on the project site that acknowledges the project is built on traditional Ohlone land, and would serve to further reduce an already less-than-significant impact.

The FMND also analyzed the cumulative impacts of the previously approved project. Project-related impacts to tribal cultural resources are site-specific and generally limited to a project's construction area. The FMND determined that cumulative impacts of the project were less than significant with mitigation. As the revised project proposes the same amount of excavation as the previously approved project, the revised project would likewise result in less-than-significant cumulative impacts with the incorporation of mitigation measures M-TCR-1.

Transportation and Circulation

The FMND noted that the previously approved project would consolidate training activities that occur at existing fire department training facilities on Treasure Island and 19th/Folsom streets. The previously approved project was found to generate approximately 82 p.m. peak hour vehicle trips, two trips by transit, and one trip by bicycling. As the revised project would include the same training activities as were anticipated for the approved project, with the exception of no longer using smoke and heat in the ventilation props, the travel demand associated with use of the facility would remain the same. The previously approved peak hour vehicle trips were found to not substantially increase traffic volumes at nearby intersections such that new traffic hazards would be created. As such, the revised project, with the same travel demand, would also not create new traffic hazards.

The previously approved project included partial construction of Hawes Street (a paper street) with a two-way primary access driveway, and two exit-only driveways on Carroll Avenue for fire and service vehicles. For the revised project, the project site would be expanded to include additional portions of Bancroft Avenue and Hawes Street, which are both currently paper streets. A new two-way driveway would be created at the location of the Griffith Street's intersection with Carroll Avenue, with a vehicle gate set back from Carroll Avenue. This new two-way driveway would be the primary vehicle entrance/exit for the proposed facility and would have a stop sign at Carroll Avenue. Curb cuts for the driveway would be compliant with the American Disabilities Act and would have a crosswalk connecting the Carroll Avenue sidewalks on either side of the two-way driveway. An additional exit-only driveway at Hawes Street would be designed for fire-apparatus and in-service vehicle circulation only. The revised project would also require review by the planning department's Streetscape Design Advisory Team (SDAT) and the City's Transportation Advisory Staff Committee, which would review the project to determine the revised project's design features would not cause potentially hazardous conditions for people walking, bicycling, and driving.

As discussed in the FMND, the average daily VMT would exceed the screening criteria, and an assessment was conducted to determine if the project would cause substantial additional miles traveled. The assessment found that as the previously approved project would consolidate the two existing training facilities, the previously approved project would result in an overall reduction in daily VMT per day and per capita. Given that revised project would similarly consolidate the existing training facilities, and generate the same levels of VMT, the revised project's impacts would be less than significant. Future 2040 average daily VMT per capita was also found to not result in substantial additional VMT for the previously approved project, which would also be applicable to the revised project.

The project site is located on the easternmost parcels between Armstrong and Carroll avenues, and Armstrong Avenue terminates in a dead end. Carroll Avenue has low numbers of vehicles and people walking and no public transit service. The revised project would have the same conditions with respect to Armstrong and Carroll avenues.

The previously approved project would have a construction duration of about 30 months and would excavate 17,000 cubic yards of soil. The revised project would have a slightly longer construction duration of 34 months and would excavate the same quantity of soil. As such, construction of the proposed project would have similar less-than-significant construction-related impact on transportation and circulation.

The revised project would include a total of 116 vehicle parking spaces, as in the previously approved project, and would similarly not result in a substantial parking deficit. Therefore, the revised project impacts related to vehicular parking would be less than significant.

Similar to the previously approved project, the revised project would have a less-than-significant impact related to transportation hazards due to a design feature or resulting from incompatible uses. While the previously approved project would have improved Hawes Street, the revised project would instead incorporate Hawes Street into the proposed project. As Hawes Street is a paper street adjacent to the project site, and north of the project site runs for one block before terminating into Yosemite Avenue, its inclusion as part of the project site would not result in inadequate emergency access. The revised project would similarly not include any impediments to pedestrian or other travel through neighborhood and would allow improved pedestrian access as the revised project would entail construction of sidewalks adjacent to the project site along Carroll Avenue. The two driveways in the revised project would similarly include visual and/or audible warning devices for people walking as vehicles exit the driveways, and all driveways would be designed to accommodate larger trucks or vehicles with larger turning radii. A stop sign would be included at the exit for the main driveway at Griffith Street onto Carroll Avenue.

As discussed in the FMND, the T Third Street light-rail, and the 29 Sunset and 54 Felton bus route are the nearest transit lines, and there is no transit service on Carroll Avenue adjacent to the site. The revised project would generate similar or less transit ridership during the p.m. peak hour compared with the projected ridership of the previously approved project because it would include the same operational characteristics in terms of number of trainees, with a reduced amount of wood burned. Therefore, the revised project would also not result in unacceptably low levels of transit service, or cause a substantial increase in delays or operating costs such that adverse impacts to transit service could result. Similar to the previously approved project, the revised project would be able to accommodate the additional pedestrian trips without becoming substantially overcrowded or substantially affecting pedestrian flows.

The previously approved project proposed one a loading bay within the project site (approximately 500-square-foot in size), near the apparatus and maintenance buildings, that would be accessed via Hawes Street. The revised project would include a loading bay near the maintenance building. As with the previously approved project, the revised project's loading bay would be larger than typical dimensions required by the planning code for on-site loading space (i.e., a standard 35-foot-long by 12-foot-wide loading space is 420 square feet) in order to accommodate large vehicles that would serve the site (e.g., deliveries of fuel). The previously approved project would have accommodated passenger loading demand either within the project site (e.g., in a parking space or near the building entrance) or within the travel

lanes on Carroll Avenue or Hawes Street adjacent to the project site. The revised project would accommodate passenger loading within the project site or with the travel lane on Carroll Avenue, but it would similarly not substantially affect access to and from the facility, or lead to substantial vehicle queues.

Similar to the FMND, the revised project would not contribute considerably to a cumulative transportation or circulation impact, and the project's cumulative impacts would be less than significant.

Noise

The FMND included an analysis of construction noise generated by the previously approved project, which was modeled in the three phases: building foundation and shoring work, building construction, and paving.¹⁰ The construction noise analysis found that the noisiest phase of construction would occur during the building foundation and shoring work. The effect was found to be potentially significant due to noise levels from pile-driving. The revised project would similarly utilize pile driving for piles that may extend to a depth of 100 feet or deeper, using the same vibratory or impact hammer methods as were anticipated for the approved project. Mitigation Measure M-NO-1, Construction Noise Control, would require the preparation of a project-specific noise control plan to meet a performance target of construction activities not resulting in a noise level greater than 90 dBA at noise-sensitive receptors and 10 dBA above the ambient noise level at noise-sensitive receptors. With implementation of this mitigation measure identified in the PMND, the revised project's construction noise impact would be less than significant.

The FMND evaluated the potential for the previously approved project to generate excessive noise or vibration levels. For the previously approved project, demolition, excavation, pile driving and restoration of the project site would require major vibration-generating construction equipment. The revised project would require deep foundations for most of the buildings or structures, and would use piles that may extend to a depth of 100 feet or deeper, using the same vibratory or impact hammer methods as were analyzed for the approved project and Mitigation Measure M-NO-1 would also apply. Therefore, the revised project would not result in new or more severe impacts than were already disclosed in the FMND.

As in the previously proposed project, the revised project would not cause damage to nearby structures, as the same construction methods would be utilized. The revised project may cause damage to the underground utility structures (similar to the approved project), including the stormwater transport/storage box that traverses the project site beneath the unbuilt Bancroft Street. As such, Mitigation Measure M-NO-2, Protection of Utility Structures and Vibration Monitoring During Construction, would be required to identify all feasible measures to avoid damage to utilities and monitor the site during construction. With implementation of this mitigation measure identified in the PMND, the vibration impact to utilities would be less than significant.

As was the case for the previously approved project, the revised project would generate operational noise associated with traffic, mechanical equipment, and fire training operations. The FMND found that project-generated traffic noise would be less than significant. As traffic associated with project operations would remain the same, the revised project traffic noise impacts would likewise remain less than significant. The revised project would include mechanical equipment, including a backup generator that would produce

¹⁰ WSP, SoundPLAN Output for 1236 Carroll Avenue, San Francisco, CA. September 23, 2021.

operational noise. The noise analysis for the previously approved project¹¹ found that mechanical equipment and the backup generator would not exceed thresholds set forth in the noise ordinance and would have less-than-significant noise impacts. The location of the backup generator (within an acoustic enclosure along the southeast wall) would be unchanged, and no mechanical equipment would be placed closer than in the previously proposed project to noise-sensitive receptors identified to the east and west of the project site. As the revised project would include the same mechanical equipment and backup generator as the previously proposed project, impacts would also remain less than significant. Training activities were also evaluated in the noise analysis,¹² and, as the training activities would include the same number and types of training exercises, and would occur in a similar location within the project site, the impacts would also remain less than significant for the revised project. Similarly, the cumulative noise impacts of the revised project would also remain less than significant.

Air Quality

The FMND found the previously approved project would have less-than-significant impacts related to conflicting with or obstructing implementation of an air quality plan or creating objectionable odors. Given the similar overall scale and scope of the revised project, it would similarly not conflict with or obstruct implementation of an air quality plan and operation would not include activities considered to create objectionable odors.

The FMND found that the previously approved project would generate criteria air pollutant emissions from both construction and operation. An air quality technical analysis of criteria air pollutant emissions and health risk impacts was prepared for the FMND.¹³ The previously approved project was found to result in less-than-significant impacts from construction for both criteria air pollutants and health risks. The revised project would include a slight reduction in the total amount of construction activity, as there would be a reduction in the total building square footage. The total construction period would increase from 30 months to 34 months, but the same total amount of excavation of 17,000 cubic yards would occur. Lengthening the construction period may result in a slight reduction in the average daily construction emissions, as a similar amount of construction would occur over a longer period of time. As such, the revised project would have similar less-than-significant criteria air pollutant emissions from construction activities. The Clean Construction Ordinance¹⁴ would apply to the revised project, same as approved project. The revised project is in the same location - outside the air pollutant exposure zone (APEZ) - as the previously proposed project. The FMND found the previously approved project would result in less-than-significant criteria air pollutant emissions from project operation due to new vehicle trips, training exercises, energy use and testing of a backup diesel generator. The revised project would include the same operational training activities, with the exception of the use of live-fire smoke or heat as part of the ventilation prop. Therefore, operational criteria air pollutant emissions would be reduced, and the revised project would also have a less-than-significant impact.

The Construction Dust Control Ordinance (San Francisco Health Code article 22B) discussed in the FMND would similarly apply to the revised project. The revised project would be required to comply with the

¹¹ Ibid.

¹² Ibid.

¹³ WSP. *Air Quality Technical Memorandum: 1236 Carroll Avenue Project, San Francisco, California*. November 2021.

¹⁴ See Chapter 25 of the San Francisco Environment Code.

ordinance requirements, which include several measures to control fugitive dust emissions from construction activities, such as wetting down areas around soil improvement operations and installing dust curtains, plastic tarps or windbreaks to minimize dust migration offsite.

The FMND found that the previously approved project would generate toxic air contaminants during construction from the use of diesel-powered construction equipment, operations from increased vehicle trips, live-fire training activities, and operations from the use of a diesel-powered generator. A health risk assessment¹⁵ was conducted for the previously approved project to determine if the construction and/or operation would substantially contribute to existing health risks at nearby off-site sensitive receptors. It evaluated the impacts of diesel particulate matter and PM_{2.5} that the previously approved project would generate, as well as the cancer risk associated with wood smoke generated by the live-fire exercises part of the previously proposed project. The health risk assessment found that there could be potentially significant health risk impacts due to the use of wood smoke during training activities. The previously approved project was required to implement Mitigation Measure M-AQ-4, Design and Maintenance Standards for Exhaust Capture Control Systems for Live-Fire Training Operations, which required the project sponsor to design exhaust control system units with sizing sufficient to the generated exhaust, to develop a standard operating procedure for particulate matter removal and control devices (scrubbers), to ensure that these air pollution control systems were properly maintained at the correct intervals, and to document the amount of wood burned during live-fire exercises, among other requirements. With implementation of the previously identified mitigation measure, health risk impacts were found to be less than significant.

The revised project would have a slightly longer construction period with roughly the same or less amount of construction activity, resulting in the same or reduced less-than-significant impact with respect to construction health risk. The revised project addresses operational emissions through a modified facility layout, reduced use of wood in live-fire events and elimination of wood burning from ventilation props. These changes reduced overall wood-fuel use for the revised project by approximately 42 tons annually, from a total of approximately 54 tons to 11.6 tons. A memorandum evaluated the updates to the operational changes to determine if the scrubbers identified in Mitigation Measure M-AQ-4, Limiting and Tracking Operational Wood Burning for Live-Fire Training Operations, that were previously required to reduce health risk impacts were needed considering the project changes.¹⁶ The memorandum documents that the changes in wood-fuel use would significantly reduce annual particulate and other emissions, and that scrubbers would not be required. However, the memorandum suggested that Mitigation Measure M-AQ-4 be revised to ensure that the overall amount of wood use is limited to 11.6 tons during project operations. Consequently, the revised Mitigation Measure M-AQ-4, Limiting and Tracking Operational Wood Burning for Live-Fire Training Operations, would be required. With implementation of the revised Mitigation Measure M-AQ-4, the revised project's impacts on air quality health risks would be less than significant, both at a project-specific and cumulative level, in line with the findings of the previously approved project in the FMND. Deletions to the revised Mitigation Measure M-AQ-4 are shown in ~~striketrough~~, while additions are shown in double underline.

¹⁵ WSP. Air Quality Technical Memorandum, 1236 Carroll Avenue Project, San Francisco, California, November 2021.

¹⁶ WSP. Memorandum: Air Quality Peer Review of SCS Engineers Report and Live Fire Clarifications for San Francisco Fire Department Training Facility (1236 Carroll Avenue), February 2025.

Mitigation Measure M-AQ-4: ~~Design and Maintenance Standards for Exhaust Capture Control Systems for Live Fire Training Operations~~

~~Prior to approval of a building permit permitting construction to occur, the project sponsor shall submit a plan to the Environmental Review Officer (ERO) or the officer's designee demonstrating with reasonable certainty that the proposed live fire prop structures include properly designed exhaust capture control systems (i.e., scrubber systems and exhaust stack attached in an outer structure) to reduce criteria air pollutants and toxic air contaminants emissions during project operations. The plan shall detail how the following requirements are met:~~

- ~~• The following live fire structures shall be equipped with an exhaust capture control system that consists of an outer structure to capture and direct smoke through the prop, remove air pollutants through a scrubber system, then exit to an exhaust stack:
 - ~~- Training tower~~
 - ~~- Condominium/apartment~~
 - ~~- Commercial structure~~
 - ~~- Victorian house~~
 - ~~- Container structure~~~~
- ~~• Scrubber systems shall be used in the live fire training area and shall be designed to meet a minimum performance standard of removal efficiency of 90 percent of particulate matter. Sizing will be developed by design engineers with knowledge of exhaust capture control systems during the design phase of the proposed project.~~
- ~~• Scrubber systems shall be ready for use during the preparation phase of the live fire training evolution prior to smoke production to ensure these systems are at their normal operating condition when live fire training starts. The preparation phase may entail establishing minimum air flow to have proper velocity in the scrubber and making sure the scrubber liquid system is operational for efficient particle removal.~~
- ~~• Scrubber systems, including scrubbing solution and accessories, shall be properly maintained at the correct maintenance intervals (which will be listed in the plan), and follow manufacturer's recommendations to ensure consistent contaminant removal efficiency throughout project perpetuity.~~
- ~~• The project sponsor shall prepare and submit to the ERO the operational procedures for operation of each live fire prop.~~
- ~~• The project sponsor shall keep and maintain documentation on the installation and maintenance of the exhaust control systems, the amount of wood pallets and Excelsior wood fiber burned (in pounds) and the number of live fire training exercises conducted per year, and submit such documentation to the Planning Department within 60 days of request. Should documentation indicate that live fire exercises are not being conducted in accordance with the air quality analysis assumptions, additional air quality analysis may be required. If necessary, additional control measures shall be placed on the project to reduce air quality effects from live fires.~~

Mitigation Measure M-AQ-4: Limiting and Tracking Operational Wood Burning for Live Fire Training Operations

The project sponsor shall limit all wood burning to 11.6 tons of wood per year. The project sponsor shall keep and maintain documentation on the amount of wood and wood pallets burned (in pounds) and the number of live fire training exercises conducted per year, and submit such documentation to the Planning Department on an annual basis. The documentation should be available within 60 days of request. Should documentation indicate that live fire exercises are being conducted in excess of the 11.6 tons of wood per year that were assumed in the air quality analysis for environmental review (including the February 2025 Air Quality Peer Review of SCS Engineers Report and Live Fire Clarifications for San Francisco Fire Department Training Facility prepared by WSP), additional air quality analysis may be required. If necessary, additional control measures (i.e., scrubber systems, exhaust capture control systems, and exhaust stacks attached in an outer structure) shall be placed on the project to reduce air quality effects from live fires.

Wind

A proposed project's wind impacts are directly related to its height, orientation, design, location, and surrounding development context. Based on wind analyses for other development projects in San Francisco, a building that does not exceed a height of 80 feet generally has little potential to cause substantial changes in ground-level wind conditions. The previously approved project was a 110-foot-tall training tower structure, and all other buildings would have been less than 80 feet tall. Based on a qualitative pedestrian wind study, the FMND found that since some of the proposed buildings would be taller than the immediate surrounding, some of the upper-level westerly winds would be redirected towards the ground level.¹⁷ This could create conditions that would likely be windier than currently exists at some locations. However, the height and width of the taller training tower structure would likely not be large enough to create hazardous wind conditions.

The revised project would include a training tower at a height of 84 feet, which would be lower than the height of the tower in the previously approved project. The revised project would also add an 80-foot-tall simulated communications tower. The locations of these training towers have shifted slightly, from adjacent to the administration building to the northwest portion of the site. Two of the buildings would also be reduced in height: the apparatus building (26 feet tall from 50 feet tall), and the maintenance building (24 feet tall from 40 feet tall). Due to the reduction in height of the training tower, the apparatus and maintenance buildings, and the addition of an 80-foot-tall simulated communications tower (which would not be of sufficient height or size to notably alter wind patterns at the site beyond what was already disclosed in the FMND), the revised project would similarly not alter wind in a manner that would substantially affect public areas. The conclusion reached in the FMND that wind impacts would be less than significant also applies to the revised project.

¹⁷ Rowan Williams Davis & Irwin Inc. (RWDI), 1236 Carroll Avenue, San Francisco, CA, Pedestrian Wind Study, RWDI #2104533, September 8, 2021.

Shadow

The FMND included an analysis of shadow impacts on the nearest public open space, the Candlestick Point State Recreation Area. A shadow analysis was prepared in the FMND, which found that net new shadows from the proposed project would be generally confined to an area within 500 feet of the project site.¹⁸ The previously approved project buildings would mainly cast net new shadows on the buildings immediately to the northeast of the development during March, September, and December evenings. During evenings throughout the year, some shadows were predicted to fall on a small section of the Candlestick Point State Recreation Area to the east of the 1236 Carroll Avenue site.

The net new shadows cast on the public open spaces at Yosemite Slough and Candlestick Point State Recreation Area were found to be of limited duration during the afternoon and early evening hours. In addition, the portion of the Candlestick Point State Recreation Area east of the project site is not heavily used; it contains tidal marsh and grassland/coastal shrub, but there are no trails or other recreational features in this portion of the open space.

The revised project includes buildings that have been generally reduced in footprint, height, and size. The training tower would be reduced in height from 110 feet to 84 feet, and two of the buildings would also be reduced in height: the apparatus building (26 feet tall from 50 feet tall), and the maintenance building (24 feet tall from 40 feet tall). In addition, the revised project would also include a different site layout, in which the buildings and training areas would be moved towards the southwest corner of the project site, and there would be parking along the eastern portion of the project site. This would have the effect of reducing shadows on the Candlestick Point Recreation Area to the east of the project site. Therefore, the net new shadows generated by the revised project would similarly not substantially adversely affect the use and enjoyment of publicly accessible open space. The conclusion reached in the FMND, that shadow impacts would be less than significant, also applies to the revised project.

Biological Resources

The project site is currently undeveloped and covered with asphalt. Dirt, gravel and debris have covered a portion of the asphalt. There are no existing trees on site or around the perimeter of the site, and unmanaged ruderal vegetation grows around the site's perimeter. The FMND found that the project site does not provide suitable habitat for special-status plant or wildlife species, and is not expected to have any effect on listed or candidate wildlife species under the federal Endangered Species Act (FESA) or the California Endangered Species Act (CESA). Stands of trees and shrubs within the Candlestick Point State Recreation Area, located east of the project site, may provide suitable habitat for common migratory birds. The FMND concluded that the vegetation east of the project site may support migratory bird species and that wildlife from the adjacent recreation area could enter the project site during construction activities. In addition, construction noise and air quality could impact migratory birds in the adjacent state park. This could lead to a significant impact to biological resources during construction. Mitigation Measures M-BI-2a, Nesting Bird Protection, and M-BI-2b, Wildlife Exclusion, from the FMND were identified to reduce the impact to a less-than-significant impact with mitigation.

¹⁸ Rowan Williams Davis & Irwin Inc. (RWDI), 1236 Carroll Avenue, San Francisco, CA, Shadow Analysis, RWDI #2104533. September 23, 2021

The revised project similarly would require construction activities over the entire project site that may affect migratory birds and wildlife traversing the site, which could result in a potentially significant impact. Implementation of Mitigation Measure M-BI-2a as revised below would require vegetation removal outside of the nesting season, and, if nesting season cannot be avoided, implementation of pre-construction surveys by a qualified wildlife biologist. Implementation of Mitigation Measure M-BI-2b would require installation of a wildlife exclusion fence prior to construction. Mitigation Measures M-BI-2a, Nesting Bird Protection has been revised to provide minor clarifications to the mitigation to clarify the required procedures for implementation. With implementation of the revised Mitigation Measures M-BI-2a, the revised project's impacts on biological resources would be less than significant, both at a project-specific and cumulative level, in line with the findings of the previously approved project in the FMND. Deletions to the revised Mitigation Measure Mitigation Measures M-BI-2a are shown in ~~striketrough~~, while additions are shown in double underline. With the implementation of these two mitigation measures, the revised project would also have a less-than-significant impact on biological resources.

Mitigation Measure M-BI-2a: Nesting Bird Protection

Nesting birds and their nests in the adjacent sensitive habitat of Candlestick Point State Recreation Area shall be protected during construction by implementation of the following:

- To the extent feasible, within 250 feet of the Candlestick Point State Recreation Area, the project sponsor shall conduct activities including, but not limited to, ground disturbance, site grading, and other construction activities that may compromise breeding birds or the success of their nests outside of the nesting season (January 15 through August 15).
- If construction activities during the bird-nesting season cannot be fully avoided within 250 feet of the Candlestick Point State Recreation Area, a qualified wildlife biologist shall conduct pre-construction nesting surveys within 72 hours prior to the start of construction or demolition if access to the property is approved by Candlestick Point State Recreation personnel. Surveys shall be repeated in construction areas that have been inactive for more than two weeks during nesting season, if the qualified wildlife biologist determines that new nesting starts may have begun in previously surveyed areas. Typical experience requirements for a "qualified biologist" include a minimum of four years of academic training and professional experience in biological sciences and related resource management activities and a minimum of two years of experience in biological monitoring or surveying for nesting birds. Surveys of suitable habitat shall be performed in the Candlestick Point State Recreation Area within 100 feet of the project site in order to locate any active nests of passerine bird species and within 250 feet of the project site to locate any active raptor (birds of prey) nests.

If active nests are located during the pre-construction nesting bird surveys, a qualified biologist shall evaluate if the schedule of construction activities within 250 feet of the Candlestick Point State Recreation Area could affect the active nests; if so, the following measures shall apply, as determined by the biologist:

- If construction within 250 feet of the Candlestick Point State Recreation Area is not likely to affect the active nest, construction may proceed without restriction; however, a qualified biologist shall regularly monitor the nest at a frequency determined appropriate for the construction activity to confirm there is no adverse effect. Spot-check monitoring frequency would be determined on a nest-by-nest basis considering the particular construction activity, duration, proximity to the nest, and physical barriers that may screen activity from the nest. The qualified biologist may revise their determination at any time during the nesting season in coordination with the planning department.
- If it is determined that construction within 250 feet of the Candlestick Point State Recreation Area may affect the active nest, the qualified biologist shall establish a no-disturbance buffer around the nest(s) and all

project work shall halt within the buffer until a qualified biologist determines the nest is no longer in use. These buffer distances shall be equivalent to the survey distances (100 feet for passerines and 250 feet for raptors); however, the buffers may be adjusted if an obstruction, such as a building, is within line of sight between the nest and construction.

- Modifying nest buffer distances, allowing certain construction activities within the buffer, and/or modifying construction methods in proximity to active nests shall be done at the discretion of the qualified biologist and in coordination with the planning department and the California Department of Fish and Wildlife, if necessary. Necessary actions to remove or relocate an active nest(s) shall be coordinated with the planning department and approved by California Department of Fish and Wildlife, if necessary. Relocation would be undertaken by a qualified individual holding a Native Wildlife Rehabilitation Permit issued by California Department of Fish and Wildlife.
- Any work that must occur within established no-disturbance buffers around active nests shall be monitored by a qualified biologist. If adverse effects in response to project work within the buffer are observed and could compromise the nest, work within the no-disturbance buffer(s) shall halt until the nest occupants have fledged.
- Any birds that begin nesting within the survey area amid construction activities are assumed to be habituated to construction-related or similar noise and disturbance levels, so no-disturbance buffer zones around nests may be reduced or eliminated in these cases as determined by the qualified biologist in coordination with the planning department and California Department of Fish and Wildlife, if necessary. Work may proceed within 250 feet of those active nests as long as the nests and their occupants are not directly affected.

In the event inactive nests are observed within 250 feet of the project site at any time throughout the year, any removal or relocation of the inactive nests shall be at the discretion of the qualified biologist in coordination with the planning department and California Department of Fish and Wildlife, as appropriate. Work may proceed within 250 feet of these inactive nests.

Geology and Soils

A geotechnical investigation and environmental site assessment were prepared for the previously approved project.^{19,20} The project site generally slopes downward from south to north. The project site was located in the San Francisco Bay until 1938, until bay filling first occurred. By 1963, the entire site was filled and raised above water. As the site was filled, boring logs indicated that the site is blanketed by artificial fill that is up to 15 feet deep at Carroll Avenue, which thickens heading towards Yosemite Avenue to as much as 32 feet in depth.

The previously approved project would have used a mix of shallow foundation and deep foundation options to support the buildings and structures. Shallow foundation options included mat foundations or spread footings. Deep foundations included H piles, torque down steel pipe piles, auger-cast-in-place piles, or pre-cast concrete piles. Piles could have required deep installation to a maximum depth of 100 feet; such piles would have been installed with a combination of vibratory and impact hammers.

¹⁹ San Francisco Department of Public Works, *SFFD Fire Training Facility: Geotechnical Characterization from Subsurface Exploration*, September 10, 2021.

²⁰ AEW Engineering Inc., *Phase I Environmental Site Assessment Report 1236 Carroll Ave, San Francisco CA*, July 16, 2021

As stated in the FMND, the project site would be connected to the existing sewer system and would not require use of septic systems. The previously approved project was found to have less than significant impacts related to exposing people or structures to potential substantial adverse effects due to rupture of an earthquake fault, strong seismic ground shaking, or seismic-related ground failure. The previously approved project was found to have less than significant impacts related to exposing people or structures to landslides, as the project would have followed final geotechnical recommendations, including ground-improvement measures, and foundation recommendations. No impact was found with respect to any unique geological or physical features at the site. The FMND determined that the previously approved project would have a less than significant impact related to substantial soil erosion or the loss of topsoil; locating a structure on a geologic unit or soil that is unstable; locating a structure on expansive soil; or directly or indirectly destroying a unique paleontological resource.

The previously approved project would have required a combination of excavation and ground improvement to a depth of 20 feet across the project site, resulting in approximately 17,000 cubic yards of excavation. The revised project proposes the same maximum depth of excavation over a slightly larger project site, but with the same total amount of excavation of 17,000 cubic yards.

Since publication of the FMND, a more detailed geotechnical investigation was prepared.²¹ The revised project would require deep foundations due to the size of the buildings and/or depth to bedrock below fill to support buildings and structures. Deep foundations may include drilled caissons, torque down steel pipe piles, auger-cast-in-place piles, driven H piles, or driven pre-cast concrete piles. Piles may extend to a depth of 100 feet or deeper. Driven piles would be installed with a combination of vibratory and impact hammers. For buildings and structures that are smaller in size and/or have shallower depth to bedrock below fill, shallow foundations (mat foundations or spread footings), combined with corrective grading and ground improvements such as densification, would be used. The report concluded that the site can be developed as proposed in the revised project, provided the recommendations presented in the report are implemented in the design and construction of the building. The revised project similarly would be required to meet state and local building code requirements, and state laws and regulations to ensure the project would have no significant impacts related to soils, seismic, or other geological hazards. No impact would occur with respect to any unique geological or physical features at the site as none are present. There would also be a less than significant impact related to substantial soil erosion or the loss of topsoil; locating a structure on a geologic unit or soil that is unstable; locating a structure on expansive soil; or directly or indirectly destroying a unique paleontological resource. Consistent with the FMND, the revised project's impacts on geology and soils would remain less than significant.

Hazards and Hazardous Materials

The FMND found that the impact of the previously approved project for both construction and operation related to the routine transport, use, and handling of hazardous material would be less than significant. A Phase I Environmental Site Assessment²² was prepared, which documented two potential recognized environmental conditions. One was a property at 1296 Armstrong Avenue, approximately 100 feet from the

²¹ ENGEO and Terra Engineers, *Geotechnical Investigation Report (Preliminary Draft): New San Francisco Fire Department Training and Administration Facilities, San Francisco, CA*, November 28, 2021.

²² AEW, *Draft Phase I Environmental Site Assessment Report: 1236 Carroll Avenue, San Francisco, CA*, March 19, 2021.

project site that documented prior contamination in groundwater. The potential for vapor encroachment was also identified from this site. The second was a former gasoline station at 2495 Jennings Street, approximately 0.24 mile from the project site.

Based on the results of the Phase I environmental site assessment, a Phase II environmental site assessment was recommended to establish baseline environmental subsurface conditions at the target site, and to determine if impacts from off-site potential recognized environmental conditions or vapor encroachment conditions are present. The Phase II environmental site assessment²³ found soil and groundwater contamination above regulatory criteria. The previously approved project would be required to remediate potential soil or groundwater contamination described above in accordance with San Francisco Health Code article 22A (Maher Ordinance). The San Francisco Department of Public Health would oversee this process. Compliance with the Maher Ordinance would ensure that no unacceptable exposures to the public would occur. The FMND found that with compliance with federal and state regulations and the Maher Ordinance, impacts would be less than significant.

Since FMND publication, an updated Phase II environmental site assessment was prepared,²⁴ which found asbestos-containing soil at approximate depths of between 5 and 10 feet below ground surface, and hazardous soil present at the site to a maximum depth of approximately 23 feet below ground surface. Arsenic, cobalt, lead, nickel and hydrocarbon byproducts were reported in soil samples above the respective human health regulatory criteria. Hydrocarbon byproducts were also detected in groundwater samples exceeding commercial and industrial vapor intrusion environmental screening levels. The Department of Public Health noted²⁵ that the site was formerly part of the Armstrong Landfill.

The Department of Public Health, acting as a CalRecycle Local Enforcement Agency, will coordinate with CalRecycle and DTSC to determine if the legacy disposal site is found to pose a material threat requiring environmental controls and land-use restrictions to be imposed on this and neighboring properties affected by the presence of the site. Analysis of offhauled soils as required under the Maher Act will provide data informing this determination. If a material threat is identified, any conditions resulting from this process would be adopted by the project sponsor, including recordation of findings on the property title. The project sponsor would seek assistance through the CalRecycle Solid Waste Disposal and Co-disposal Site Cleanup Program for cleanup of solid waste sites and solid waste at co-disposal sites where the responsible party either cannot be identified or is unwilling or unable to pay for timely remediation and where cleanup is needed to protect public health and safety and/or the environment.

As described above, the revised project would result in the same maximum 20-foot depth of soil disturbance over a larger area but would result in the same total 17,000 cubic yards to soil excavation in comparison to the previously approved project. The revised project would be required to comply with the Maher Ordinance according to the submitted application, and would be required to comply with federal and state regulations regarding hazardous materials onsite, which would also address the presence of

²³ AEW. Phase II Environmental Site Assessment Report, 1236 Carroll Avenue, San Francisco, California, July 26, 2021.

²⁴ AEW Engineering, Inc. Phase II Environmental Site Assessment, New SFFD Fire Training and Administration Facility, 1236 Carroll Avenue, San Francisco, California, March 18, 2025.

²⁵ San Francisco Department of Public Health. California Postclosure Land Use Requirements for Owners and Operators of Solid Waste Disposal Sites: Armstrong Landfill (SWIS #38-AA-0032) - Solid Waste Disposal Site - Intersection of Armstrong Avenue and Hawes Street San Francisco, CA 94124. April 30, 2025.

hazardous soils at the site, and the former use as a landfill. Consistent with the FMND, the revised project's impacts on hazards and hazardous materials would remain less than significant.

Other Environmental Topics

The revised project would have similar, less-than-significant impacts related to population and housing; aesthetics; greenhouse gas emissions; recreation; utilities and service systems; public services; hydrology and water quality; mineral and energy resources; wildfire; and agricultural resources. The revised project, which would include a similar scope and intensity of construction to what was analyzed under the approved project, with a reduction in total square footage and height of buildings, and the same total amount of excavation, would neither increase the severity of these impacts associated with the project or result in new or substantially different environmental effects, either on a project-specific level or cumulatively. Therefore, these topics do not warrant further discussion.

Conclusion

Based on the foregoing, it is concluded that the analyses conducted and the conclusions reached in the FMND adopted and issued on December 30, 2021 remain valid and that no supplemental environmental review is required. The proposed revisions to the project would not cause new significant impacts not identified in the FMND, and no new mitigation measures would be necessary to reduce significant impacts. No changes have occurred with respect to circumstances surrounding the proposed project that would cause significant environmental impacts to which the project would contribute considerably, and no new information has become available that shows that the project would cause significant environmental impacts. Therefore, no supplemental environmental review is required beyond this addendum.

I do hereby certify that the above determination as been made pursuant to State and Local requirements.



Lisa Gibson
Environmental Review Officer

June 4, 2025

Date of Determination:

cc: Scott Moran, San Francisco Public Works
Garreth Miller, San Francisco Fire Department
Rebecca Salgado, San Francisco Planning Department
Bulletin Board/Master Decision File
Distribution List

Attachments:

Attachment A: Figures

Attachment B: SCS Engineers, *San Francisco Department of Training (DOT)—Mitigation Measure M-AQ-4 Review*, March 12, 2024

Attachment C: WSP, *Air Quality Peer Review of SCS Engineers Report and Live Fire Clarifications for San Francisco Fire Department Training Facility (1236 Carroll Avenue)*, February 18, 2025



Attachment A: Figures Figure 1: Revised Project Parcel Map

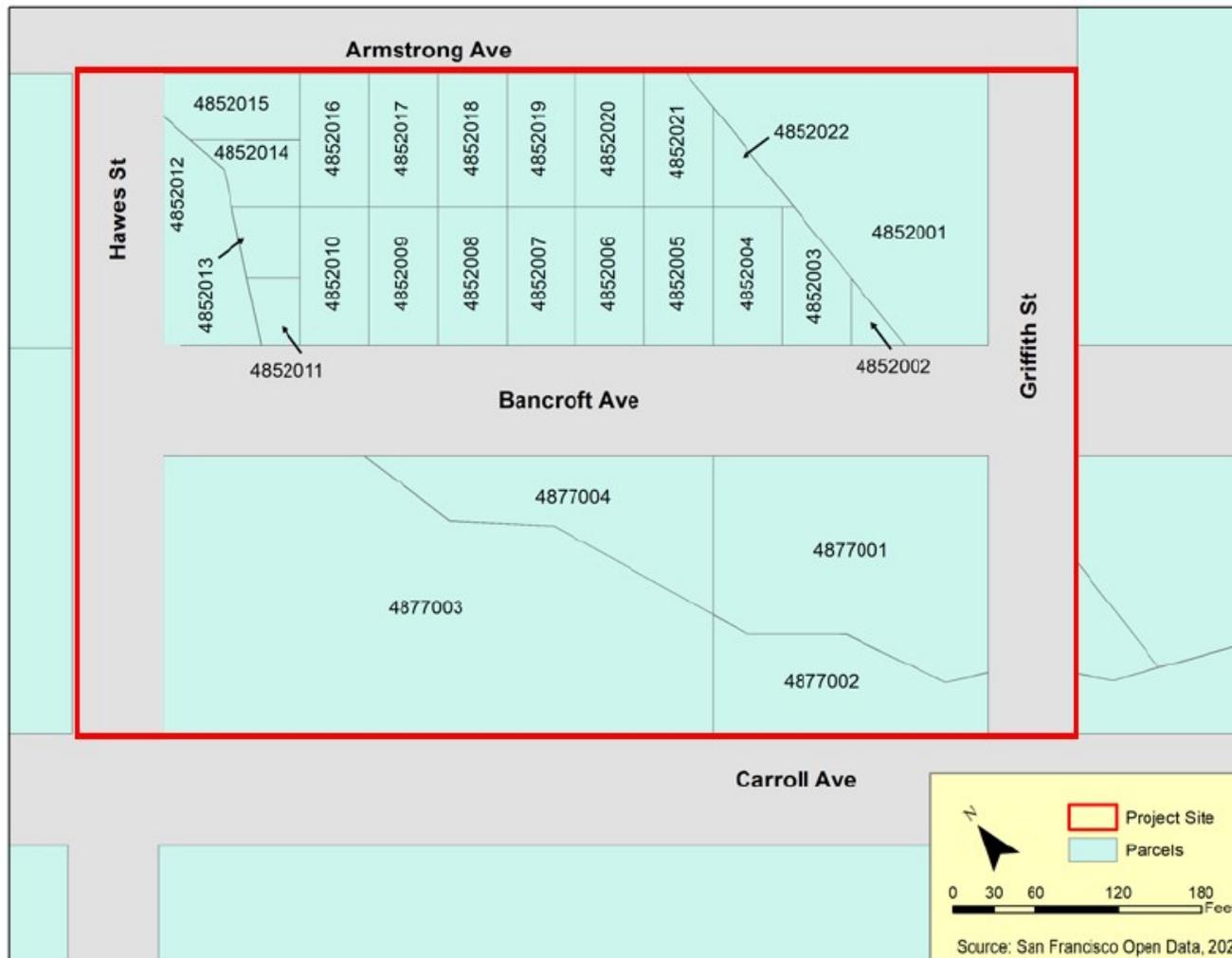


Figure 2: Revised Project Site Plan



Figure 3: Project Renderings



(Clockwise from upper left: view looking northeast, southwest, north, and northeast)