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ADDENDUM 6 TO ENVIRONMENTAL IMPACT REPORT

Date of Addendum:	May 17, 2021
Date of EIR Certification:	May 28, 1992
EIR Title:	San Francisco International Airport Master Plan Final Environmental Impact Report
EIR Case No.:	**1986.638E**
Project Title:	**SFO Consolidated Administration Campus**
Project Case No.:	2019-006583ETM
Block/Lot:	N/A
Project Site:	6.6 acres
Project Sponsor:	San Francisco International Airport, Audrey Park, 650.821.7844, audrey.park@flysfo.com
Lead Agency:	San Francisco Planning Department
Staff Contact:	Jennifer Barbour McKellar, 628.652.7563, jennifer.mckellar@sfgov.org

Overview

The project sponsor, the City and County of San Francisco, acting by and through the San Francisco Airport Commission (Airport Commission) has submitted to the San Francisco Planning Department Environmental Planning Division (EP) a project description and related materials for proposed revisions to its Consolidated Administration Campus (CAC) project at San Francisco International Airport (SFO or the Airport). On May 28, 1992, the San Francisco Planning Commission (planning commission) certified the San Francisco International Airport Master Plan Final Environmental Impact Report (Planning Case No. 86.638E; Master Plan FEIR or FEIR).[1] The Master Plan encompasses landside facilities and circulation systems designed to increase operational efficiency and accommodate forecast demand of 51.3 million annual passengers. Since adoption of the Master Plan, the administration facilities as envisioned in the Master Plan has been modified. These revisions were evaluated in an addendum to the FEIR published in 2015 (2015 Addendum). The Airport Commission approved the modifications that same year and a portion of what is now referred to as the Consolidated Administration Campus (CAC) has subsequently been constructed in the West Field, which is the area generally northwest of the Airport terminal buildings, south of San Bruno Avenue, and east of U.S. 101 (see **Figure 1**, p. 6).

Since adoption of the Master Plan and publication of the 2015 Addendum, the CAC as envisioned in the Master Plan has been further modified and includes a new consolidated administration building, a parking garage, expansion of the West Field AirTrain station platform, and associated improvements, including relocation of the AirTrain mechanical facility to the first floor of the proposed parking garage

[1] San Francisco Planning Department, *San Francisco International Airport Master Plan Final Environmental Impact Report*, Case No. 86.638E, State Clearinghouse No. 90030535, May 1992. This document (and all documents cited in this addendum unless otherwise noted) is available for review on the following website: *https://sfplanninggis.org/PIM/*. Individual files related to environmental review can be accessed by entering the case number (2019-006583ETM). Project application materials can be viewed by clicking on the "Related Documents" link under the ETM case number.

and construction of two pedestrian bridges providing access between the administration building and the AirTrain station (collectively, the modified project).

This addendum to the FEIR evaluates the modified project to determine whether additional environmental documentation must be prepared. As demonstrated in this addendum, the planning department has determined that the modified project is within the scope of the FEIR prepared for the Master Plan certified by the San Francisco Planning Commission, and no additional environmental review beyond the analysis herein is required.

Background

Master Plan FEIR

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

The Master Plan focused on accommodating passenger and cargo growth at the Airport through the development of improved facilities and circulation patterns for all Airport-owned lands (excluding the undeveloped area west of U.S. 101, which is referred to as the West of Bayshore).[2] The major Master Plan improvements included in the FEIR analyses were:

1. The new International Terminal Building and associated Boarding Areas A and G, completed in 2000;
2. Consolidation and renovation of cargo facilities in the North and West Field areas, which commenced in 1997 and is ongoing;[3]
3. An automated people mover system ("AirTrain"), the first phase of which was completed in 2003, with the extension of the AirTrain system to serve a multi-modal transportation center and long-term parking garages, completed in 2020;
4. Roadway and vehicle circulation improvements to the International Terminal Building, completed in 2000;
5. On-Airport hotel development, completed in 2019;
6. Renovation of the former International Terminal (Terminal 2) for domestic operations, completed in 2011;
7. Redevelopment of the South Terminal (Harvey Milk Terminal 1), Boarding Area B, which began construction in 2016 and opened in stages beginning in 2019, and renovation of Boarding Area C, which is anticipated to begin in 2022; and
8. New administration/office facilities completed in 2000 and 2018.

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

[3] A separate addendum is currently being prepared for the SFO West Field Cargo Redevelopment project. The West Field Cargo Redevelopment project and the CAC project are separate and independent projects because each would be constructed independent of the other, at different times and in different locations on Airport property.

ADMINISTRATION FACILITIES IN THE FEIR

As described in the Master Plan FEIR (pp. 54 to 55), the Master Plan proposed development of the administration facilities in two phases:

- Phase 1 near-term buildout (1996) included construction of a new four-level administration area totaling 160,000 square feet (in conjunction with an on-Airport hotel) within the International Terminal Building, and demolition of the then-existing 33,900-square-foot Pan Am Administration building, for a Phase I total of 126,100 square feet of new administration space; and
- Phase 2 long-term buildout (2006) included construction of a new 100,000-square-foot stand-alone office building with an ancillary five-level employee parking garage (1,200 parking stalls) to be located west of the terminal complex below the elevated AirTrain and Bay Area Rapid Transit (BART) tracks near the intersection of North McDonnell Road and North Link Road, a portion of which is currently used as a surface parking lot for United Airlines pilots.

Since the FEIR, the Airport has implemented portions of the administration facilities, including construction of a one-level administration facility (40,000 square feet) within the International Terminal Building; demolition of the Pan Am Administration building (33,900 square feet); demolition of Airborne Freight building (21,000 square feet); construction of administration space for cargo tenants (55,540 square feet) within Building 648,[4] and construction of administration space for Airport employees within Building 674 (136,400 square feet).

PARKING IN THE FEIR

As described in the Master Plan FEIR (Table 47, p. 326), over the long term, the Master Plan proposed to increase the number of Airport and tenant employee parking spaces from 12,934 in 1990 to 15,666 in 2006, for a net increase of 2,732 parking spaces. However, accounting for the loss of employee parking due to development and parking reallocation elsewhere at the Airport, employee parking has decreased since the Master Plan FEIR was published, from 12,934 spaces in 1990 to 11,108 spaces today.[5] The existing number of employee and tenant parking spaces is well below the 15,666 spaces analyzed in the FEIR regarding long-term parking supply conditions.

2015 Addendum

In 2015, an addendum was published addressing revisions to the approved Master Plan administration facilities. Instead of developing separate administration facilities in the terminal area, the Airport proposed to develop administration facilities on one consolidated West Field site located at the northeast corner of North McDonnell Road and West Field Road, about 0.5 mile north of the administration facilities location proposed in the Master Plan. The 2015 Addendum analyzed demolition of Buildings 676 and 670,[6] totaling 62,500 square feet, construction of four new administration and

[4] Building 648 replaced the former Airborne Cargo Building (Building 41), which had been damaged in the 1989 Loma Prieta earthquake. Demolition of the Airborne building also resulted in demolition of about 21,000 square feet of administration space, assuming that approximately 35 percent of this building was in administration use.

[5] Ricondo & Associates, *Memorandum: Parking Supply Analysis, San Francisco International Airport*, revised February 21, 2019, Table 1-1. The employee parking in this table (10,972 parking spaces for employees) has increased by 136 spaces (construction of Building 674 removed 96 employee parking spaces, and 232 temporary employee parking spaces were added to Plot 11, for a net increase of 136 employee parking spaces).

[6] Building 676 is currently an office for the SFO Engineering and Construction Services. Building 670 was used for administrative functions and storage prior to demolition.

support buildings (totaling 258,700 square feet, or a net increase of 196,200 square feet), and two parking garages, providing a net increase of 445 parking spaces. Since approval, the Airport has constructed one four-story, 69-foot-tall building on the north side of the site and demolished Building 670 (SFO Museum storage) to provide temporary surface employee/City vehicle parking lot.

Modified Project Description

Since adoption of the Master Plan, the administration facilities as envisioned in the Master Plan have been modified to include a new consolidated administration building, a parking garage, expansion of the West Field AirTrain station platform and associated improvements, including relocation of the AirTrain mechanical facility to the first floor of the parking garage and construction of pedestrian bridges providing access between the AirTrain station and adjacent West Field Area facilities. These project components are collectively referred to as the "modified project."

Table 1 summarizes and compares the Airport administration and parking facilities as evaluated in the Master Plan FEIR and the modified project. As shown in Table 1, the modified project would result in an approximately 260,340-square-foot net increase in office/administration space, as compared to that evaluated in the FEIR. With implementation of the modified project, there would be 6,307 fewer parking spaces than were evaluated in the Master Plan FEIR.

CAC ADMINISTRATION BUILDING 670

The Airport proposes to construct a 338,000-square-foot building (Building 670) on West Field Road, near the intersection of North McDonnell Road. The site is currently a temporary employee and city vehicle surface parking lot containing approximately 295 parking spaces (see **Figure 1**, p. 6). About 54,400 square feet of Building 670 would be dedicated to office use for existing tenant and City/Commission employees from other administration facilities at the Airport, such as Building 710, Building 575, and the terminal areas.[7] Therefore, the modified project would not generate new employees at the Airport. The remaining 283,600 square feet would be dedicated to shared space for fitness/lockers, conference rooms, meeting areas, circulation, and mechanical space, as well as support space and storage of the SFO Museum's collections.

As shown in **Figure 2**, p. 7, and **Figure 3**, p. 8, the proposed 11-story, approximately 132-foot-tall Building 670 would occupy the southern portion of the project site between the Building 674 office/administration facilities completed in 2019 and West Field Road. The proposed office/administration building would consist of a steel-frame structure supported by spread footings (maximum depth of 5 feet) located on piles pre-drilled and cast in place to a maximum depth of 100 feet below ground surface. The building would include a new Tier 4-compliant diesel back-up generator.[8] The proposed building would be designed and constructed to Leadership in Energy and Environmental Design (LEED) Gold standards and in compliance with applicable sections of San Francisco's Environment Code, including for the electrification of municipal facilities. Landscaping would be limited to drought tolerant, non-seeding plants to discourage wildlife/birds from foraging at the modified project site. In addition, construction of

[7] Space that would be vacated in these buildings may be backfilled with existing SFO tenants or would remain empty until demolition.

[8] A number of federal and state regulations require increasingly cleaner off-road equipment. Specifically, both the U.S. Environmental Protection Agency and the California Air Resources Board have set emissions standards for new off-road equipment engines, ranging from Tier 1 to Tier 4. Tier 1 emissions standards were phased in from 1996 to 2000, and Tier 4 interim and final emission standards for all new engines were phased in between 2008 and 2015. To meet the Tier 4 Final emissions standards, engine manufacturers are required to produce new engines with advanced emission-control technologies.

Building 670 would include installation of a subsurface internet cable underneath West Field Road from Building 620 to the ground floor of Building 670.

Table 1 FEIR and Modified Project Comparison

Component	Master Plan FEIR	Built as of 2020 (net)	Modified Project	Remaining under the Master Plan FEIR
OFFICE/ADMINISTRATION FACILITIES – NET NEW SQUARE FEET				
CAC Office/Administration (Building 674)	—	104,700[a]	338,000	—
Demolished West Field Office/Administration Space (Building 676)			(30,800)[b]	
Net New West Field Office/Administrative Space (Building 670)	—	*104,700*	*307,200*	—
Other Office/Administration Space (Building 648 and in Building 100 [International Terminal Building])	226,100	95,540[c]	—	—
Total Office/Administration Space	**226,100[d]**	**200,240**	**307,200**	**(260,340)[e]**
EMPLOYEE PARKING – SPACES				
Existing Employee Parking	12,934	11,108[g]	—	—
Proposed Employee Parking (net new)	2,732	—	1,105[h]	—
Total Employee Parking	**15,666[f]**	**11,108**	**1,105**	**3,453**

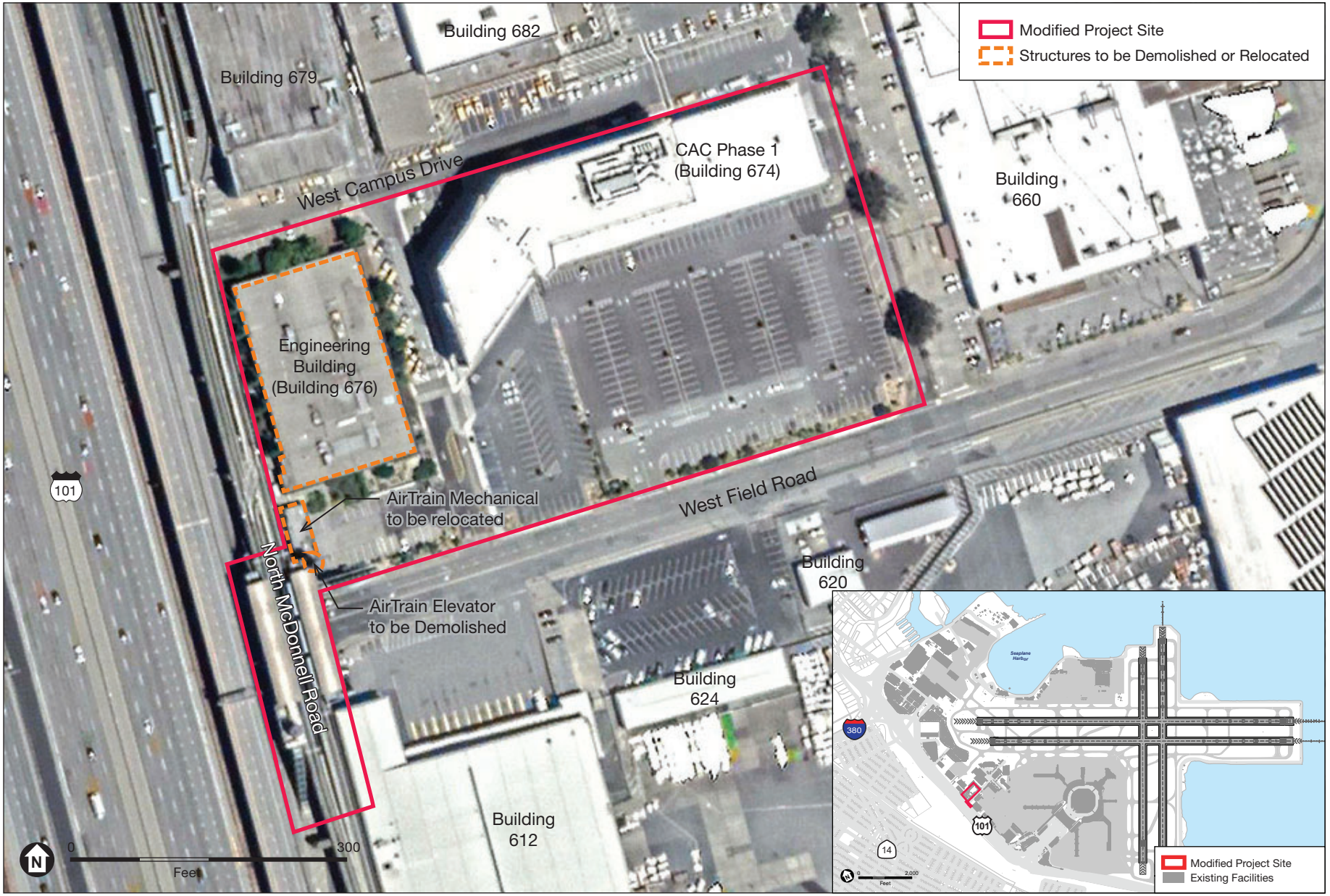
SOURCES: *SFO Master Plan*, November 1989; *SFO Master Plan Final Environmental Impact Report*, May 1992; Ricondo Associates, *Memorandum: Parking Supply Analysis, San Francisco International Airport*, revised February 21, 2019, Table 1-1; and SFO Design & Construction Division, 2019.

NOTES:

[a] Construction of office/administrative space on Plot 11 (136,400 square feet) less demolition of 31,700 square feet of office/administrative space due to the demolition of Building 670 in 2019.
[b] The modified project would include demolition of the existing Building 676 (30,800 square feet).
[c] Construction of office/administrative space within Building 648 (55,540 square feet) and built office/administrative space on one level in the International Terminal Building (40,000)
[d] Construction of office/administrative space at the International Terminal Building (160,000 square feet), plus a 100,000-square-foot office building in the West Field, less demolition of the Pan Am Administration Building (33,900 square feet).
[e] FEIR office/administration space (226,100 square feet) less total office/administration space built as of 2020 (200,240 square feet), plus demolition of 21,000 square feet of office/administrative space in former Building 41 (Airborne Freight Building), and less the modified project (307,200 square feet).
[f] The Master Plan FEIR planned for 15,666 employee parking spaces in Lot D, Lot DD, Lot C/CC, and other locations at the Airport.
[g] The total existing employee parking is provided in 16 different locations on Airport property. Refer to Ricondo Associates, *Memorandum: Parking Supply Analysis, San Francisco International Airport*, revised February 21, 2019, Table 1-1 for a list of existing employee parking locations and footnote 5 of this document.
[h] There are about 295 surface spaces at the modified project site. Construction of the modified project would include a 1,400-stall parking garage, or net an increase of 1,105 spaces at the site.

PARKING GARAGE (BUILDING 675)

Under the modified project, Building 676, currently used for Airport administrative offices, and an AirTrain station elevator shaft would be demolished to accommodate a parking garage (Building 675) for City vehicles, visitors, and City/Airport employees located at the West Field area, including existing Buildings 674, 682, and the proposed Building 670 (see Figure 2, p. 7). The proposed parking garage would replace Building 676 and would be located on the west side of the project site, near the intersection of North McDonnell Road and West Field Road. The existing AirTrain mechanical facility located at the northeast corner of the intersection of North McDonnell and West Field roads, would be demolished and reconstructed on the first level of the proposed parking garage.

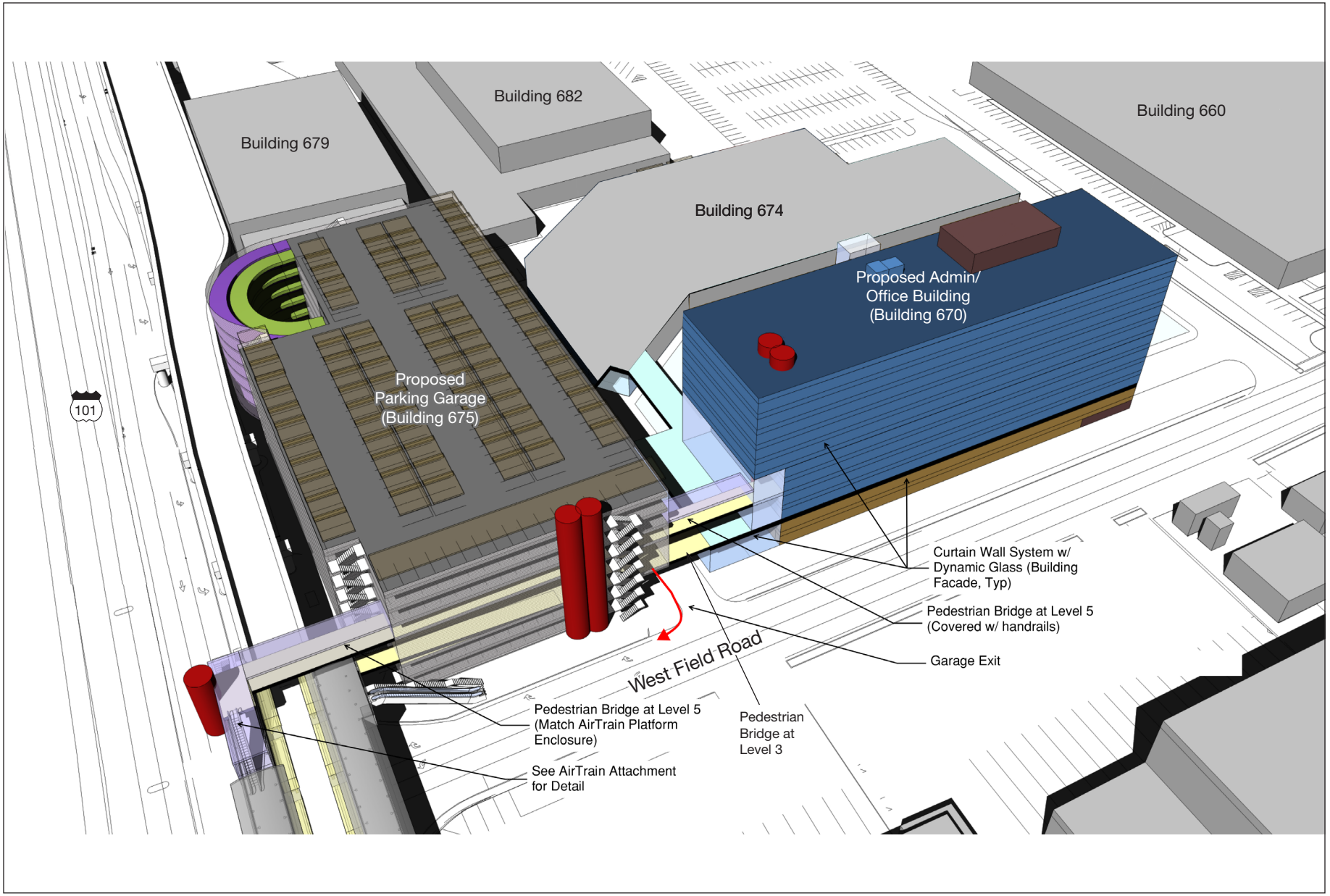


SOURCE: SFO Bureau of Planning and Environmental Affairs, 2020

Consolidated Administration Campus; Case No: 2019-006583ETM

FIGURE 1

MODIFIED PROJECT SITE

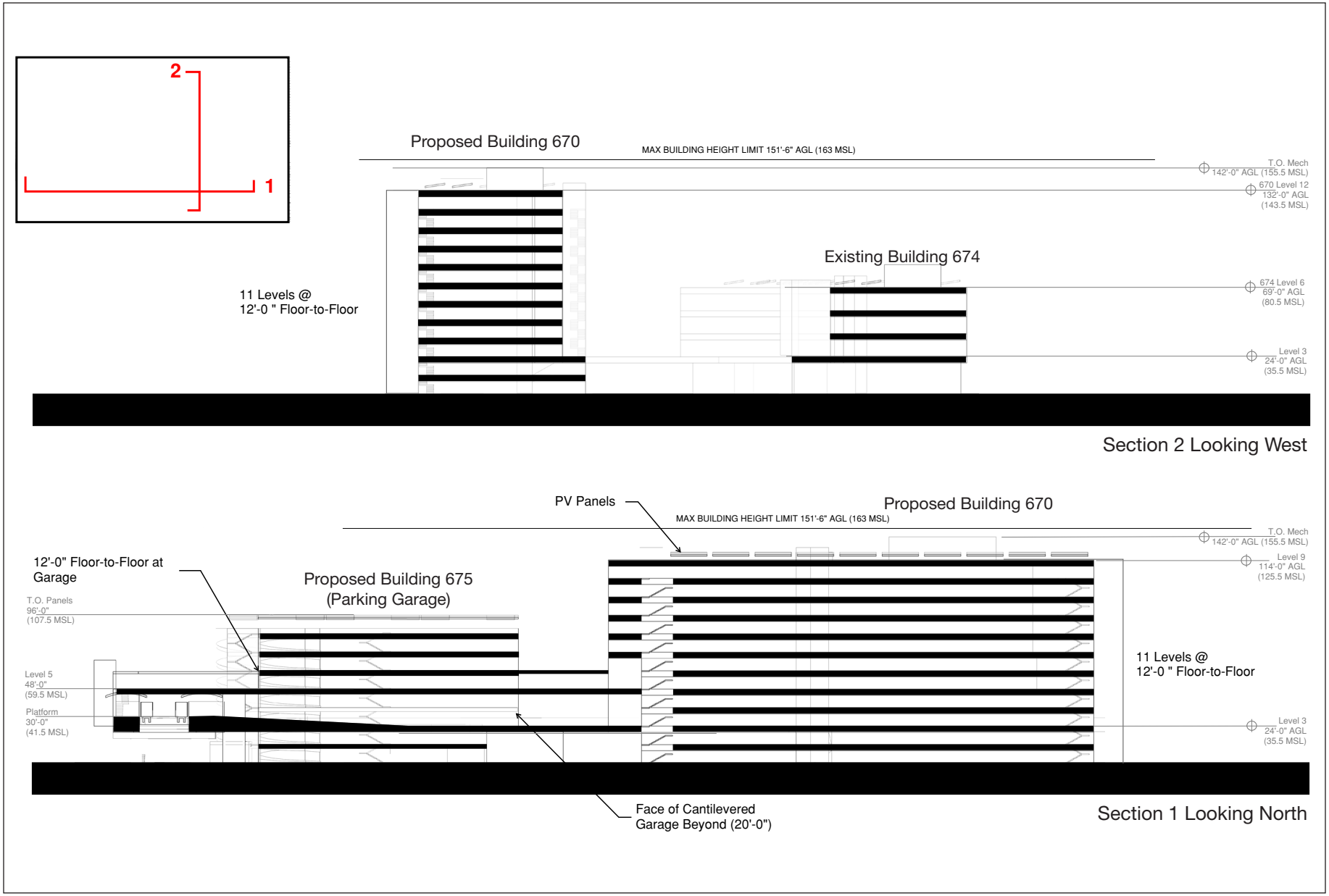


SOURCE: Landrum & Brown, Inc., and SFO Bureau of Planning and Environmental Affairs, 2020

Consolidated Administration Campus; Case No: 2019-006583ETM

FIGURE 2

MODIFIED PROJECT – AXONOMETRIC VIEW



SOURCE: Landrum & Brown and SFO, 2020

Consolidated Administration Campus; Case No: 2019-006583ETM

FIGURE 3

MODIFIED PROJECT – SECTION VIEW

The proposed parking garage would provide about 1,400 parking spaces (about 1,105 net new spaces) in an eight-level, approximately 96-foot-tall structure. Access to and from the parking garage would be from West Campus Drive on the north side of the structure and a garage exit to West Field Road would be located on the southeast corner of the structure. The garage would consist of a streel-frame structure constructed on a concrete slab foundation supported by reinforced concrete piles that would be predrilled to bedrock, cast in place, and then capped. The concrete piles could be drilled to a depth of up to 120 feet below ground surface. The Airport would designate about 8 percent of the parking spaces in the garage for low-emitting vehicles, consistent with LEED Gold requirements.

WEST FIELD ROAD AIRTRAIN STATION IMPROVEMENTS AND PEDESTRIAN CORRIDOR

As shown in **Figure 4**, the modified project would also include the following improvements to the West Field Road AirTrain station:

- Vertical connections (exterior staircases, elevator, and escalators) providing pedestrian access between the ground level, parking garage, and AirTrain station platforms;
- A new roof and enclosure over the fifth-level pedestrian bridge;
- An AirTrain platform extension to accommodate 4-car trains;
- Elevated pedestrian corridor connecting Buildings 674, 670, 626 and parking garage to the AirTrain station platform.

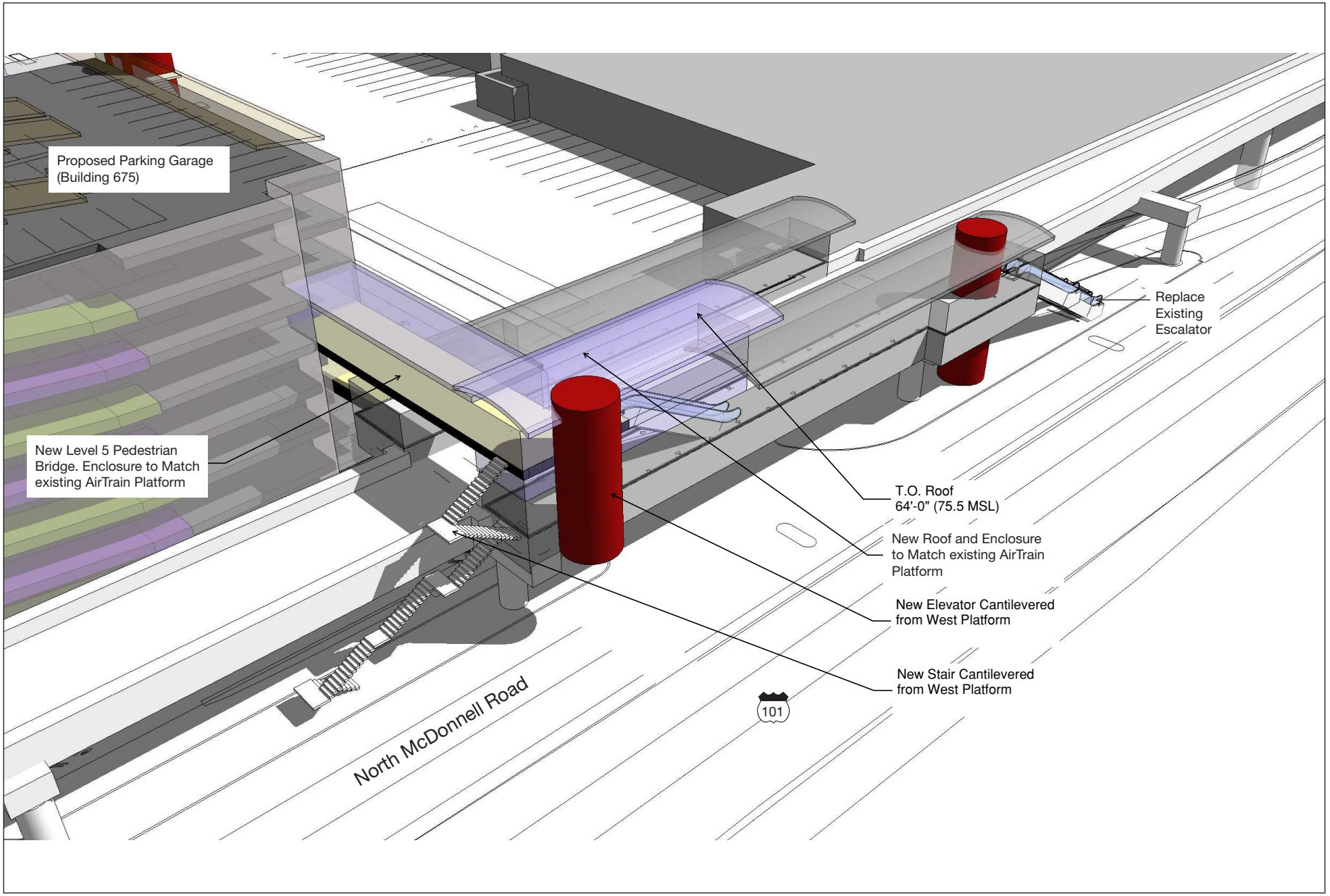
There would be no change to the existing SamTrans northbound and southbound bus routes or bus stops on North McDonnell Road as a result of the modified project. SamTrans would continue to service the existing intersection of North McDonnell Road and West Field Road.

LANDSCAPING

The modified project would replace approximately 295 surface parking spaces adjacent to Building 674 with an approximately 3-acre landscaped plaza. The landscaped plaza would be between the proposed Building 670 and the existing Building 674.

Construction Schedule

Utility work to reroute utilities from Building 676 to a nearby substation on Airport property south of the project site would occur in 2022. Demolition of Building 676 would occur in early 2023, and construction of the parking garage would occur from mid-2023 to mid-2024. Construction of the West Field Road AirTrain station improvements would occur throughout 2024, and construction of Building 670 would be completed over 18 months (from mid-2024 through late 2025). The overall construction period for the modified project would be approximately 45 months. Construction of the modified project would include the following construction activities: demolition, site grading, construction, and interior finishes. Construction staging would occur on Airport property at Plot 16D on South Airport Boulevard and North Access Road, immediately north of Interstate 380 (see **Figure 5**, p. 11).

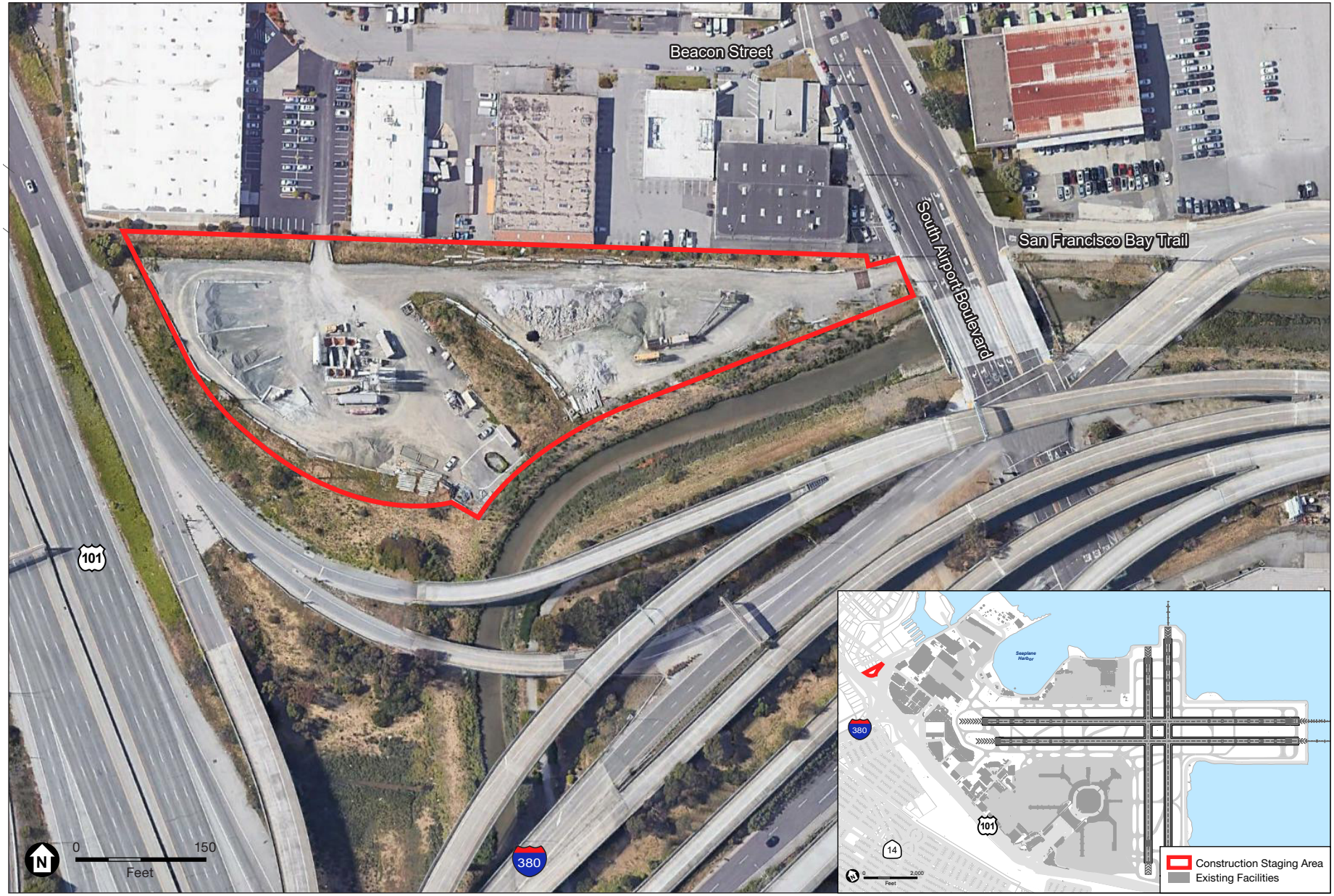


SOURCE: Landrum & Brown and SFO, 2020

Consolidated Administration Campus; Case No: 2019-006583ETM

FIGURE 4

MODIFIED PROJECT – WEST FIELD ROAD AIRTRAIN STATION IMPROVEMENTS



SOURCE: SFO Bureau of Planning and Environmental Affairs, 2020

Consolidated Administration Campus; Case No: 2019-006583ETM

FIGURE 5

CONSOLIDATED ADMINISTRATION CAMPUS CONSTRUCTION STAGING AREA

Approvals and Permits

Discussed below are the permits and approvals that would be required from federal, state, and local agencies to implement the modified project as described in this addendum.

FEDERAL APPROVAL AND PERMIT

- Federal Aviation Administration (FAA). As a federally obligated public use airport, SFO shall coordinate with the FAA for environmental review per FAA Order 1050.1F, Environmental Impacts: Policies and Procedures.

- FAA, Air Traffic Division, Form 7460-1 Permit. Approval of Form 7460-1, Notice of Proposed Construction or Alteration, to construct on an airport.

LOCAL APPROVALS AND PERMITS

- **San Francisco Airport Commission.** Adoption of California Environmental Quality Act (CEQA) Findings.
- **SFO Building Inspection and Code Enforcement (BICE), Building Permit.** Issuance of permit. All plans, specifications, calculations, and methods of construction shall meet the code requirements found in the California Uniform Building Code.
- **San Francisco Bay Area Air Quality Management District (air district).** Authority to Construct and/or Permit to Operate an Emergency Standby Generator – Diesel Engine. Issuance of permit for stationary sources of air emissions, specifically emergency standby generators.

Project Setting

As shown in Figure 1, p. 6, the modified project site is bounded by West Campus Drive to the north, Building 660 to the east, West Field Road to the south, and North McDonnell Road to the west. The modified project site is currently developed with an office building (Building 676) and paved for use as a parking lot and driveways. The AirTrain mechanical facility and elevator is located south of Building 676 adjacent to North McDonnell Road, and the West Field Road AirTrain station platforms are located above the northbound lanes of North McDonnell Road.

Building 660, a 42-foot-tall, approximately 248,000-square-foot facility used by the U.S. Postal Service, is located east of the modified project site. A surface parking lot and three buildings are located south of the modified project site: Building 612, a 49-foot-tall, approximately 115,000-square-foot cargo building; Building 624, a 24-foot-tall, approximately 8,100-square-foot storage facility; and Building 620, a 30-foot-tall, approximately 3,050-square-foot telecommunications facility. North McDonnell Road and U.S. 101 are located west of the modified project site, and Building 679, a 70-foot-tall, approximately 40,000-square-foot AirTrain maintenance and storage facility, and Building 682, a 62-foot-tall, approximately 76,000-square-foot Airport maintenance facility are located north of the modified project site. The closest school is Belle Air Elementary School in San Bruno, located approximately 0.3 mile northwest of the modified project site. The closest residential uses are located on Seventh Avenue in San Bruno approximately 0.3 mile northwest of the modified project site.

Cumulative Development

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

Table 2 presents a list of SFO projects that are currently under construction or are reasonably foreseeable future projects that could potentially combine with the modified project to result in cumulative impacts.

Table 2 Cumulative Projects on SFO Property

Count	Project Name and Description	Anticipated Construction
1	**Recommended Airport Development Plan (RADP)** – A long-range plan to guide the Airport's landside development. The purpose of the RADP is to plan for forecast passenger and operations growth at SFO through the following measures: maximizing gate capacity, geometry, and flexibility; optimizing lobby and security flows and incorporating new technology for passenger screening; maximizing shared-use facilities and baggage claim flexibility; and maximizing transfer connectivity for passengers and baggage.	2023–2035
2	**Shoreline Protection Program** – This project would install a new seawall that would comply with current Federal Emergency Management Administration requirements for flood protection and incorporate designs for future sea-level rise.	2025–2032
3	**West Field Cargo Redevelopment** – This project would demolish seven buildings and construct two consolidated cargo/ground service equipment (GSE) facilities and one ground service equipment facility to accommodate current and future air cargo operations.	2022–2029

SOURCE: SFO Five-Year Capital Plan, 2019.

CEQA Analysis Approach

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

This addendum evaluates whether the potential environmental impacts of the modified project are addressed in the Master Plan FEIR, which was certified on May 29, 1992.[9] More specifically, this addendum evaluates whether the modified project would cause new significant impacts that were not identified in the Master Plan FEIR; would result in significant impacts that would be substantially more severe than those identified in the FEIR; and whether the modified project would require new mitigation measures to reduce significant impacts. This addendum also considers whether changes have occurred with respect to the circumstances of the modified project that would cause significant environmental impacts to which the project would contribute considerably, or whether new information has been put forward demonstrating that the modified project would cause new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts.

The Master Plan FEIR analyzed impacts of the Master Plan in the areas of Land Use and Plans, Transportation, Noise, Air Quality, Energy, Cultural Resources, Geology and Seismicity, Hazardous Materials, Employment and Housing, Utilities, Public Services, Aviation Safety, and Growth Inducement. In addition, the Master Plan Initial Study (FEIR Volume III, Appendix A) analyzed impacts in the areas of Visual Quality, Population, Climate, Biology, Water, and Energy/Resources.

This addendum evaluates the potential project-specific environmental impacts of the modified project described above and incorporates by reference information contained in the Master Plan FEIR. This addendum also documents the assessment and determination that the modified project is within the scope of the Master Plan FEIR and no additional environmental review is required.

Evaluation of Environmental Effects

Cultural Resources

FEIR FINDINGS

Cultural resources are analyzed on pp. 183 to 191 and pp. 371 to 373 of the Master Plan FEIR. The FEIR evaluated the effects of the Master Plan on cultural resources, including archeological, historic, and paleontological resources.

The FEIR determined that the Master Plan projects would be constructed on former Bay land that was drained and filled with artificial fill to create a broad flat area. While prehistoric cultural activity could have occurred, such areas have been altered by the prior land reclamation and intense airport development. Further, a cultural resources report[10] found that while there are prehistoric archeological sites located in the vicinity of the Airport, none were on Airport property. The FEIR concluded that while there are no known archeological resources at the Airport, the possibility exists for the presence of buried archeological resources—including those that contain human remains. The FEIR included the following mitigation measures to reduce impacts related to archeological resources to less than significant: Mitigation Measure I.D.1.a. (Review by Project Archeologist); Mitigation Measure I.D.1.b. (Procedure for

[9] San Francisco Planning Department, *San Francisco International Airport Master Plan Final Environmental Impact Report*, Case No. 86.638E, State Clearinghouse No. 90030535, May 1992.

[10] David Chavez Associates, *Cultural Resources Evaluation for the San Francisco International Airport Master Plan EIR*, San Mateo County, California, August 1990, revised February 1991.

reporting Significant Artifacts); Mitigation Measure I.D.1.c. (Inspection and Retrieval of Significant Artifacts); and Mitigation Measure I.D.1.d (Archeologist Report).

The Airport property boundary has not changed since adoption of the FEIR. Therefore, the modified project would not result in any new or substantially greater prehistoric archeological impacts beyond those identified in the FEIR.

When the FEIR was certified in 1992, the evaluation of cultural resources conformed to CEQA Guidelines Appendix K, whose "importance" criteria relating to historical resources were later amended and officially adopted in 1998 to establish the California Register of Historical Resources (California register). The FEIR determined that there are no historical resources that meet CEQA Guidelines Appendix K "importance" criteria located on Airport property that will be affected by the Master Plan projects.[11]

MODIFIED PROJECT IMPACTS

HISTORIC ARCHITECTURAL RESOURCES

Only one age-eligible (i.e., 45 years or older) building, Building 676, is located within the project site. Building 676 was evaluated in 2020 for eligibility for listing in the National Register of Historic Places (national register) as part of the Consolidated Administration Campus project.[12] Building 676 was constructed in 1968 on the east side of North McDonnell Road near the intersection with West Field Road as an administration building for Pacific Air Lines. Beginning in 1969, the building was occupied by the Engineering Division of the San Francisco Public Utilities Commission (the precursor to the Airport Commission) and later by the engineering division of SFO. The one-story, 30,800-square-foot building has a rectangular footprint, is clad in metal siding within aluminum-frame curtain walls, and is capped by a flat roof. The 2020 evaluation found that Building 676 is not individually significant under any national register criteria and does not contribute to any known or potential historic districts on the Airport property. Although the 2020 evaluation did not evaluate the buildings for eligibility for listing in the California register, the planning department has determined that it concurs with the findings of the 2020 evaluation and that Building 676 is not considered a historical resource for the purposes of CEQA.[13]

Therefore, the modified project would have less-than-significant impacts on historical architectural resources as defined in CEQA Guidelines section 15064.5 because there are no such resources immediately adjacent to or within the project site. Therefore, the modified project would not result in any new or substantially greater impacts to historic resources beyond those identified in the FEIR and would not require new mitigation measures.

ARCHEOLOGICAL RESOURCES

ESA conducted a records search for the project site and all areas within 0.5 miles of the modified project site at the Northwest Information Center (NWIC) of the California Historical Resources Information System at Sonoma State University in Rohnert Park, California on June 4, 2014, and November 14, 2019 (NWIC File No. 13-1887 and 19-0835); these were updated on July 23, 2020 (NWIC File No. 20-0162). The

[11] Ibid.

[12] ESA, *Cultural Resources Report for the SFO Engineering Administration Building, Building 676*, prepared for the Federal Aviation Administration and San Francisco International Airport, September 2020.

[13] San Francisco Planning Department, *Part I Historic Resource Evaluation Response: San Francisco International Airport (SFO) Engineering Administration Building – Building 676/Jason G. Yuen Engineering and Architecture Building, Planning Record No. 2019-006583ETM,* January 20, 2021.

records search included a review of previous studies, records, and maps on file at the NWIC, including a review of the State of California Office of Historic Preservation Historic Properties Directory with summary information from the National Register, Registered California State Landmarks, California Historic Points of Interest, Archeological Determinations of Eligibility, and California Inventory of Historical Resources. The purpose of the records search was to: (1) determine whether known archeological resources have previously been recorded in a 0.5-mile radius of the modified project site; and (2) assess the likelihood for unrecorded cultural resources to be present based on historical references and the distribution of nearby cultural resources.

The records search results, as well as additional background research completed by ESA, did not identify any recorded archeological resources within the modified project site. Four prehistoric and historic-era archeological resources have been recorded between 0.3 and 0.5 mile from the modified project site.

Prior to the 1920s, the setting of the modified project site was a salt marsh. However, prehistorically the modified project site was dry land within a broad river valley. Starting around 10,000 years ago, the river valley was inundated as rising sea levels created San Francisco Bay, gradually drowning the lands at the future site of the airport between 6,000 and 2,000 years ago. As the rate of sea level rise slowed, sediments carried into the bay from the adjacent land accumulated along the shoreline and marshlands developed: in 1869, marshes extended some 0.8 miles eastward of the modified project site before meeting the open waters of the bay, and about 0.25 miles west of the modified project site to the dry shoreland.

The marsh setting that characterized the modified project site during the past 2,000 years, and the underlying Young Bay Mud, generally have low sensitivity for the presence of near surface prehistoric archeological resources and for historic period residential or farming-related resources, because marshes, which may be very wet, or inundated tidally or seasonally. However, prehistoric human remains have occasionally been found in marsh and Young Bay Mud settings, deeply buried, in several instances.

In the 19th and early 20th centuries, piers and elevated roadways were built across the marshes in some areas to provide access to the bay for fishing or shipping. Later, dry lands were created through the construction of water diversion features in the marshlands west of the modified project site. At that time, the waters east of the airport site were a designated oyster fishery, which suggests that these were shallow, gravelly shoals. No archival documentation of historic use of the modified project site has been found, and it is not anticipated that the remains of such features would be encountered at the modified project site.

Based on its environmental history, it appears that the modified project site was not suitable for prehistoric occupation during the past 2,000 years. However, this location at one time was adjacent to the bay shore and not far distant from creeks that entered the bay, a setting that was highly favored by prehistoric Native Americans. More than 400 prehistoric shell middens—sites of substantial prehistoric Native American occupation—were visible on the surface around San Francisco Bay in 1904 (Nelson 1906). On this basis, the shoreline setting is assumed also to be sensitive for the presence of older shoreline prehistoric archeological sites, occupied and used during the time that the bay was filling and subsequently inundated and buried by bay bottom and (later) marsh silt deposits (known locally as Young Bay Mud). If present, archeological resources that were present at this time would most likely be found beneath the Young Bay Mud, at or near the surface of the underlying Upper Layered Sediments stratum that predate that bay in this area.

As revealed in geotechnical cores, and discussed in more detail below, the geologic stratigraphy at the project site, from surface to depth, consists of artificial landfill soils, underlain by stratum of Young Bay Mud, which rests directly atop the surface of the Upper Layered Sediments which, in turn, rest on Old Bay Clay. The Upper Layered Sediments are interbedded Pleistocene-age marine and terrestrial deposits[14] (that is, deposited alternately, in marine and terrestrial environmental) that formed the land surface during the Early to Middle Holocene period (ca. 11,700 to 3,800 years ago); the time during which humans first inhabited the San Francisco Peninsula. While in some areas the surface of the Upper Layered Sediments stratum was eroded away by the tidal action of the rising bay, under some environmental conditions the upper surface of these sediments has been preserved intact beneath the Young Bay Mud. In these circumstances, there is the potential for the presence of Middle Holocene archeological deposits. These would be expected to be located beneath the Young Bay Mud, in the upper 3 to 5 feet of the Upper Layered Sediments.

Based on the geotechnical investigations, the modified project site consists of approximately 6.5 to 9 feet of artificial fill, which was used to reclaim the tidal marsh during the 1950s. Underlying the artificial fill is a relatively thin stratum of Young Bay Mud that extends to a depth of 13 to 24.5 feet below ground surface (bgs). The Young Bay Mud, deposited in an aquatic environment,[15] has low sensitivity for prehistoric archeological resources, with the possible exception of rare, isolated prehistoric human remains. Below the Young Bay Mud, the Upper Layered Sediments and underlying Old Bay Clay extend to a depth of approximately 144 feet bgs. As discussed above, the Upper Layered Sediments stratum may represent the land surface at the project site during the terminal Pleistocene, which potentially was habitable in the late Pleistocene to early Holocene, the time at which humans are believed to have first arrived in the Bay Area. For this reason, the interface between Young Bay Mud and the Upper Layered Sediments is potentially sensitive for containing buried prehistoric archeological deposits. Such deposits, if present in this context, are highly significant archeologically because only a few such resources have been found, and because they likely represent the earliest human occupation of the region.

To assess whether sediments evidencing the potential for presence and survival of archeological resources are present beneath the project site, a geoarcheologist reviewed the coring logs from geotechnical borings conducted at the project site. The objective of this review was to look for evidence, in the logs, of the presence of paleosols (strata with evidence of having been exposed on the land surface for long enough that they could harbor archeological deposits); and for evidence of prehistoric erosion of the Upper Layered Sediments stratum, which might have destroyed or disturbed paleosols if they were present.

Eleven geotechnical cores were extracted from the project site or immediate vicinity. The project geoarcheologist noted that several of the core logs describe the upper surface of the Upper Layered Sediments as greenish grey silty clays and sandy silts, which are indicative of an aquatic environment.[16,17,18]

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[14] Julius Schlocker, *Geology of the San Francisco North quadrangle*, California: U.S. Geological Survey, Professional Paper 782, 1974.

[15] Brian F. Byrd, Philip Kaijankoski, Jack Meyer, Adrian Whitaker, Rebecca Allen, Meta Bunse, and Bryan Larson, *Archaeological Research Design and Treatment Plan for the Transit Center District Plan Area, San Francisco, California*. Prepared by Far Western Anthropological Research Group, Past Forward Inc., and JRP Historical. Prepared for the City and County of San Francisco Planning Department, San Francisco, CA, 2010, 86. This document is confidential and shall not be publicly circulated.

[16] Treadwell and Rollo*, Geotechnical Investigation, West Field Improvements, San Francisco International Airport, San Francisco, California*. Prepared for City and County of San Francisco, 1996.

[17] ENGEO, *Geotechnical Data Report, San Francisco International Airport (SFIA), SFO Consolidated Administration Campus, San Francisco, California*. Prepared for San Francisco International Airport, 2013.

[18] AGS, *Final Geotechnical Study Report, Building 624 Improvements Project, Southfield Tenant Relocations, San Francisco International Airport, San Francisco, California*. Prepared for San Francisco International Airport, 2015.

However, about half of the cores, which for geotechnical purposes are not sampled continuously, did not include samples at the Young Bay Mud/ Upper Layered Sediments interface, so did not provide definitive data on the depositional environment of the upper stratum of the Upper Layered Sediments. Geoarcheological analysis also included review of a geotechnical study of a larger area of the airport, conducted in 2000, which concludes that there is evidence for widespread erosion of the Upper Layered Sediments in the general project vicinity based on substantial irregularities in the depths and thicknesses of various strata. These variations suggest that the Upper Layered Sediments stratum has been cut by deep erosion channels at various locations around the airport. This pattern of erosion may have reduced the potential for survival of potentially habitable pre-Bay land surfaces within the modified project site.

Three of the cores at the project site recovered samples of a stratum of black silty sand at the top of the Upper Layered Sediments, which may reflect re-deposition of these upper layers by erosion. However, it is also possible that this stratum could indicate the presence of organic material, which might suggest the presence of a paleosol. One core log noted rootlets at the Young Bay Mud/Upper Layered Sediments contact, which could point to the presence of terrestrial or marsh soils. While the geotechnical data from the site therefore suggest that the surface of the potentially sensitive Upper Layered Sediments may have been deposited in an environment not conductive to human occupation, this interpretation is not conclusive, since many of the cores did not sample the critical stratigraphic interface; and while generalized data from the airport overall suggest that substantial erosion occurred in the vicinity prior to or during the deposition of the Young Bay Mud stratum, results with respect to the project site also are inconclusive. These uncertainties are does to the fact that many cores did not sample the critical stratigraphic interface at the project site; because only core logs, and not core samples, were available for assessment by a geoarcheologist; and because the evidence of widespread prehistoric erosion evinced in cores elsewhere around the airport has not been explicitly documented at the project site. On this basis, while it is possible that past environmental conditions do not favor the preservation of prehistoric archeological deposits that may have been present at the project site, because of the high level of significance of any resources that may survive, the site must be considered to be sensitive for the presence of submerged prehistoric archeological resources. Any project impacts to such a resource would be significant.

Direct project excavations at the project site would disturb soils to 5 feet depth. At these depths, excavations would be confined to fill and Young Bay Mud strata. These strata are not archeologically sensitive (with the possible exception of potential isolated human remains), so mass excavations would not be expected to result in impacts to archeological resources. However, Buildings 670 and 675 would require pile foundations up to 120 feet depth. Piles would be driven through the fill, Young Bay Mud and Upper Layered sediments, which would result in a significant impact if a deeply buried prehistoric deposit were present at the project site near the surface of the Upper Layered Sediments.

The FEIR concluded that while there are no known archeological resources at the Airport, the possibility exists for the presence of buried archeological resources—including those that contain human remains. Consistent with the initial stipulation of FEIR Mitigation Measure 1.D.1.a.[19] SFO retained the services of a qualified archeologist to review project soil and geotechnical data and provide recommendations for further steps to be taken to ensure that impacts to significant archeological resources and human

[19] FEIR Mitigation Measure 1.D.1.a: Review by Project Archaeologist. The project sponsor will retain the services of an archeologist. The sponsor will submit copies of the general soil survey and site-specific geotechnical investigations prepared for the San Francisco Airport expansion projects for review by the project archeologist. The project archeologist will report recommendations to the Environmental Review Officer (ERO). The archeologist will give consideration to the potential presence of coastal prehistoric sites below existing bay alluvium and remains of Chinese shrimp camps (c. 1870 to c. 1910 A.D) in evaluating the archeological sensitivity of individual projects sites and in developing recommendations.

remains are avoided or mitigated. The results of that review and consultation, which took into account advances in geoarcheological knowledge in recent decades, are presented above.

As detailed in the analysis above, there may be a potential for project pilings to encounter highly significant Middle Holocene prehistoric archeological resources. For this reason, while this potential is uncertain, if a buried prehistoric deposit were present it would be highly significant. Therefore, based on the project archeologist's recommendation and consultation with the ERO, and consistent with archeological treatments applied for San Francisco projects in similar settings, **Mitigation Measure CR-1, Archeological Testing,** is included in the project. In accordance with this measure, geoarcheological testing would be undertaken at the project site prior to pile construction to more definitively ascertain whether significant prehistoric deposits or paleosols that may harbor such deposits are present and would be affected by pile construction.

Mitigation Measure CR-1, Archeological Testing, set forth in full below, would implement appropriate archeological treatment as identified through the archeological review, recommendation and consultation process set forth in the initial paragraph of FEIR Mitigation Measure 1.D.1.a. Archeological testing, in this case, would consist of geoarcheological coring on the project site, with continuous cores from the surface to 5 feet below the surface of the Upper Layered Sediments, distributed at approximately 50-meter horizontal intervals across the portion of the site where pile foundations would be needed. The geoarcheologist would open and assess the cores for the presence of potential paleosols and, if a potential paleosol is present, would sample the core for further analysis and dating. If a paleosol or a prehistoric deposit is identified, further testing and/or data recovery would be scoped in consultation between the archeologist and the ERO, and implemented as detailed in the mitigation measure.

> **Mitigation Measure CR-1: Archeological Testing** *(Implementing FEIR Mitigation Measure 1.D.1.a through 1.D.1.d)*. Based on a reasonable presumption that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of a qualified archeological consultant having expertise in California prehistoric and urban historical archeology. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c).
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> *Archeological Testing Program.* The archeological testing program shall be conducted in accordance with the approved Archeological Testing Plan (ATP). The purpose of the archeological testing program will be to determine to the extent possible the presence or

absence of archeological resources and to identify and to evaluate whether any archeological resource encountered on the site constitutes an historical resource under CEQA.

The archeological consultant and the ERO shall consult on the scope of the ATP reasonably prior to any project-related soils disturbing activities commencing. The archeological consultant shall prepare and submit to the ERO for review and approval an ATP. The ATP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, lay out what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. The ATP shall also identify the testing method to be used, the depth or horizontal extent of testing, and the locations recommended for testing and shall identify archeological monitoring requirements for construction soil disturbance as warranted. The archeologist shall implement the approved testing as specified in the approved ATP prior to and/or during construction. The archeologist shall consult with the ERO at the conclusion of testing to report testing results, determine whether data recovery is needed, and provide construction monitoring recommendations and shall implement monitoring as determined in consultation with the ERO.

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

The scope of the ADRP shall include the following elements:

- Field Methods and Procedures. Descriptions of proposed field strategies, procedures, and operations.
- Cataloguing and Laboratory Analysis. Description of selected cataloguing system and artifact analysis procedures.
- Discard and Deaccession Policy. Description of and rationale for field and post-field discard and deaccession policies.
- Interpretive Program. Consideration of an on-site/off-site public interpretive program based on the results of the archeological data recovery program.
- Security Measures. Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities.
- Final Report. Description of proposed report format and distribution of results.

- Curation. Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

Consultation with Descendant Communities. On discovery of an archeological site associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group an appropriate representative of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to offer recommendations to the ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Final Archeological Resources Report (FARR) shall be provided to the representative of the descendant group.

Human Remains and Funerary Objects. The treatment of human remains and funerary objects discovered during any soils disturbing activity shall comply with applicable State and federal laws. This shall include immediate notification of the San Mateo County Medical Examiner and, in the event of the Medical Examiner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission, which will appoint a Most Likely Descendant (MLD). The MLD will complete his or her inspection of the remains and make recommendations or preferences for treatment within 48 hours of being granted access to the site (Public Resources Code section 5097.98). The ERO also shall be notified immediately upon the discovery of human remains.

The project sponsor and ERO shall make all reasonable efforts to develop a Burial Agreement ("Agreement") with the MLD, as expeditiously as possible, for the treatment and disposition, with appropriate dignity, of human remains and associated or unassociated funerary objects (as detailed in CEQA Guidelines section 15064.5(d)). The Agreement shall take into consideration the appropriate excavation, removal, recordation, scientific analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. If the MLD agrees to scientific analyses of the remains and/or associated or unassociated funerary objects, the archeological consultant shall retain possession of the remains and associated or unassociated funerary objects until completion of any such analyses, after which the remains and associated or unassociated funerary objects shall be reinterred or curated as specified in the Agreement.

Nothing in existing State regulations or in this mitigation measure compels the project sponsor and the ERO to accept treatment recommendations of the MLD. However, if the ERO, project sponsor and MLD are unable to reach an Agreement on scientific treatment of the remains and associated or unassociated funerary objects, the ERO, with cooperation of the project sponsor, shall ensure that the remains associated or unassociated funerary objects are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity, in a location not subject to further or future subsurface disturbance.

Treatment of historic-period human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activity, additionally, shall follow protocols laid out in the project's Archeological treatment documents, and in any related agreement established between the project sponsor, Medical Examiner and the ERO.

Archeological Public Interpretation Plan. The project archeological consultant shall submit an Archeological Public Interpretation Plan (APIP) if a significant archeological resource is discovered during a project. If the resource to be interpreted is a tribal cultural resource, the APIP shall be prepared in consultation with and developed with the participation of Ohlone tribal representatives. The APIP shall describe the interpretive product(s), locations or distribution of interpretive materials or displays, the proposed content and materials, the producers or artists of the displays or installation, and a long-term maintenance program. The APIP shall be sent to the ERO for review and approval. The APIP shall be implemented prior to occupancy of the project.

Final Archeological Resources Report. Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO. The archeological consultant shall submit a draft Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describes the archeological, historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken, and if applicable, discusses curation arrangements.

Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the ARR to the NWIC. The Environmental Planning Division of the Planning Department shall receive one bound copy and one unlocked, searchable PDF copy on digital medium of the approved FARR along with GIS shapefiles of the site and feature locations and copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

Curation. Significant archeological collections shall be permanently curated at an established curatorial facility selected in consultation with the ERO.

Implementation of Mitigation Measure CR-1 would reduce the potentially significant impact to prehistoric archeological resources to a less than significant level.

There also is the potential for accidental discovery of archeological resources during project construction; in particular, isolate human remains. Implementation of **Mitigation Measure CR-2, Accidental Discovery**, would reduce the potential for the project to result in significant impacts to unanticipated archeological resources and to human remains, as defined in CEQA section 15064.5, consistent with the conclusion of the FEIR. Mitigation Measure CR-1 reflects updates to the mitigation measure consistent with current planning department practices, and supersedes FEIR **Mitigation Measures I.D.1.a through I.D.1.d**.[20]

Mitigation Measure CR-2: Accidental Discovery *(Implementing FEIR Mitigation Measures I.D.1.a through I.D.1.d)***.** The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in CEQA Guidelines Section 15064.5(a) and (c).

[20] The full text of the Master Plan FEIR mitigation measures are available in the Final Mitigation Monitoring and Reporting Program (MMRP), as adopted by the Airport Commission on November 1992.

ALERT Sheet. The project sponsor shall distribute the Planning Department archeological resource "ALERT" sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, pile driving, etc. firms); or utilities firm involved in soils-disturbing activities within the project site. Prior to any soils-disturbing activities being undertaken, each contractor is responsible for ensuring that the "ALERT" sheet is circulated to all field personnel, including machine operators, field crew, pile drivers, supervisory personnel, etc. The project sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) confirming that all field personnel have received copies of the Alert Sheet.

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

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

Discovery Treatment Determination. Measures might include preservation in situ of the archeological resource; an archeological monitoring program; an archeological testing program; and/or an archeological interpretation program. If an archeological interpretive, monitoring, and/or testing program is required, it shall be consistent with the Environmental Planning Division guidelines for such programs and shall be implemented immediately. The ERO may also require that the project sponsor immediately implement a site security program if the archeological resource is at risk from vandalism, looting, or other damaging actions.

Consultation with Descendant Communities. On discovery of an archeological site associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group an appropriate representative of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to offer recommendations to the ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Final Archeological Resources Report (FARR) shall be provided to the representative of the descendant group.

Archeological Data Recovery Plan. If an archeological data recovery program is required by the ERO, the archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The project archeological consultant, project sponsor, and ERO shall

meet and consult on the scope of the ADRP. The archeological consultant shall prepare a draft ADRP that shall be submitted to the ERO for review and approval. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.

The scope of the ADRP shall include the following elements:

- Field Methods and Procedures. Descriptions of proposed field strategies, procedures, and operations.
- Cataloguing and Laboratory Analysis. Description of selected cataloguing system and artifact analysis procedures.
- Discard and Deaccession Policy. Description of and rationale for field and post-field discard and deaccession policies.
- Interpretive Program. Consideration of an on-site/off-site public interpretive program during the course of the archeological data recovery program.
- Security Measures. Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities.
- Final Report. Description of proposed report format and distribution of results.
- Curation. Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

Human Remains and Funerary Objects. The treatment of human remains and of funerary objects discovered during any soils disturbing activity shall comply with applicable State and federal laws. This shall include immediate notification of the San Mateo County Medical Examiner and, in the event of the Medical Examiner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC), which will appoint a Most Likely Descendant (MLD). The MLD will complete his or her inspection of the remains and make recommendations or preferences for treatment within 48 hours of being granted access to the site (Public Resources Code section 5097.98). The ERO also shall be notified immediately upon the discovery of human remains.

The project sponsor and ERO shall make all reasonable efforts to develop a Burial Agreement ("Agreement") with the MLD, as expeditiously as possible, for the treatment and disposition, with appropriate dignity, of human remains and associated or unassociated funerary objects (as detailed in CEQA Guidelines section 15064.5(d)). The Agreement shall take into consideration the appropriate excavation, removal, recordation, scientific analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. If the MLD agrees to scientific analyses of the remains and/or associated or unassociated funerary objects, the archeological consultant shall retain possession of the remains and associated or unassociated

funerary objects until completion of any such analyses, after which the remains and associated or unassociated funerary objects shall be reinterred or curated as specified in the Agreement.

Nothing in existing State regulations or in this mitigation measure compels the project sponsor and the ERO to accept treatment recommendations of the MLD. However, if the ERO, project sponsor and MLD are unable to reach an Agreement on scientific treatment of the remains and/or associated or unassociated funerary objects, the ERO, with cooperation of the project sponsor, shall ensure that the remains and/or associated or unassociated funerary objects are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity, in a location not subject to further or future subsurface disturbance.

Treatment of historic-period human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activity, additionally, shall follow protocols laid out in the project archeological treatment document, and other relevant agreement established between the project sponsor, Medical Examiner and the ERO.

Archeological Public Interpretation Plan. The project archeological consultant shall submit an Archeological Public Interpretation Plan (APIP) if a significant archeological resource is discovered during a project. If the resource to be interpreted is a tribal cultural resource, the APIP shall be prepared in consultation with and developed with the participation of Ohlone tribal representatives. The APIP shall describe the interpretive product(s), locations or distribution of interpretive materials or displays, the proposed content and materials, the producers or artists of the displays or installation, and a long-term maintenance program. The APIP shall be sent to the ERO for review and approval. The APIP shall be implemented prior to occupancy of the project.

Final Archeological Resources Report. The project archeological consultant shall submit a confidential draft Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource, describes the archeological and historical research methods employed in the archeological monitoring/data recovery program(s) undertaken, and discusses curation arrangements

Once approved by the ERO, copies of the approved FARR shall be distributed as follows: California Archeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy, and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning Division of the Planning Department shall receive one bound copy and one unlocked, searchable PDF copy on digital medium of the FARR along with GIS shapefiles of the site and feature locations and copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources.

Curation. Significant archeological collections shall be permanently curated at an established curatorial facility selected in consultation with the ERO.

In summary, the modified project would not result in any impacts greater than those disclosed in the FEIR related to archeological resources with implementation of Mitigation Measures CR-1 and CR-2, which implement the mitigation measures identified in the FEIR. Therefore, the modified project would not

result in any new significant or more-severe impacts on archeological resources than those identified in the FEIR, and would not require new mitigation measures.

CUMULATIVE IMPACTS

As discussed above, no historic resources are present on or adjacent to the project site. The modified project would not result in any new or substantially greater impacts to historic properties beyond those identified in the FEIR. Therefore, impacts from the modified project could not combine with other cumulative projects in the project vicinity to result in a significant cumulative impact on historic architectural resources.

Generally, the area for cumulative analysis of archeological resources is the project site where excavation would occur. None of the cumulative projects noted in Table 2, p. 13, would overlap with construction activities at the project site, nor are there any known archeological resources on the modified project site that extend beyond the boundaries of the project site and could be affected by nearby development. In addition, all cumulative projects at the Airport would be subject to Mitigation Measure CR-1, which would ensure that archeological analysis is conducted during project planning and appropriate treatment for potential resources are identified and implemented; and that if archeological resources or human remains are identified during construction they are treated appropriately. Therefore, impacts from the modified project could not combine with other cumulative projects in the project vicinity to result in a significant cumulative impact on archeological resources or human remains.

Tribal Cultural Resources

FEIR FINDINGS

The FEIR did not analyze impacts on tribal cultural resources, as this topic was not mandated for inclusion under CEQA until 2016.

MODIFIED PROJECT IMPACTS

There are no known archeological resources in the project vicinity that could be considered tribal cultural resources. The analysis above states there is the potential to uncover buried prehistoric archeological resources in the project site because reinforced concrete piles would be predrilled to bedrock (approximately 120 feet below ground). However, the City does not have record of any tribal cultural resources in the modified project site. Consistent with prior consultation between the City and Ohlone tribal groups, all prehistoric sites identified would be considered to be potential tribal cultural resources.

While unlikely, ground disturbing activities, including pile construction, could damage archeological resources that are considered tribal cultural resources, if present. Accordingly, the modified project would be subject to Mitigation Measure CR-1 and Mitigation Measure CR-2, as noted above. Implementation of this mitigation measure would reduce potential impacts on tribal cultural resources to a less-than-significant level.

CUMULATIVE IMPACTS

The FEIR did not make an impact determination specific to cumulative tribal cultural resource effects. The geographic extent of cumulative tribal cultural resources impacts is typically the project site, where excavation would occur. None of the cumulative projects noted in Table 2, p. 13, would overlap with

activities at the project site. Therefore, with implementation of Mitigation Measure CR-1 and Mitigation Measure CR-2, impacts from the modified project could not combine with other cumulative projects in the project vicinity to result in a significant cumulative impact on tribal cultural resources.

Transportation and Circulation

MASTER PLAN FEIR FINDINGS

Transportation and circulation impacts of Master Plan projects were analyzed on pp. 125 to 152 and pp. 265 to 330 of the Master Plan FEIR. The Master Plan FEIR determined that several transportation and circulation impacts related to intersection, freeway ramp, and freeway mainline segment operations were potentially significant, but would be reduced to a less-than-significant level with implementation of the 11 mitigation measures identified in the Master Plan FEIR. The 11 transportation and circulation mitigation measures were designed to address the potential impacts through a variety of mechanisms that take a comprehensive, system-wide approach to reducing single-occupant vehicle trips, increasing transit access, and upgrading airport roadway infrastructure to accommodate anticipated demand. To the extent that transportation mitigation measures would not avoid or substantially lessen the impacts of Master Plan projects, the Airport Commission made a finding that the environmental, economic, and social benefits of the Master Plan would override the remaining impacts related to traffic, as stated fully in the Airport Commission's adoption of the Statement of Overriding Considerations.[21]

MODIFIED PROJECT TRAVEL DEMAND METHODOLOGY AND RESULTS

The modified project would not affect the level of air traffic and thus would have no effect on passenger travel to and from the Airport. The modified project would result in development of approximately 260,340 square feet more office/administration space than was analyzed in the Master Plan FEIR; however, only 54,400 square feet would be occupied office space. The remaining modified project floor area (approximately 206,000 square feet) would be shared space for fitness/lockers, conference rooms, meeting areas, circulation, loading docks, or mechanical space. While the square footage of office/administration space is greater than what was evaluated in the Master Plan FEIR, as discussed above under the modified project description, the additional office/administration space would not generate new employees at the Airport. Rather, employees from other buildings at the Airport, such as Building 710, Building 575, and the terminal complex, would relocate to the new Building 670. The modified project is intended to centralize and improve administrative operations for existing employees, and would not result in an increase in travel demand.

MODIFIED PROJECT IMPACTS

CONSTRUCTION

Construction to reroute utilities from Building 676 to a nearby substation on Airport property south of the project site would occur in 2022. Demolition of Building 676 would occur in early 2023, and construction of the parking garage would occur from mid-2023 to mid-2024. Construction of the AirTrain Station improvements would occur throughout 2024, and construction of Building 670 would be completed over

[21] Airport Commission, SFO Master Plan, *Findings Related to the Approval of the SFIA Master Plan*, November 3, 1992, pp. 58 to 62).

18 months (from mid-2024 through late 2025). Construction of the modified project would include the following construction activities: demolition, site grading, construction, and interior finishes.

During the construction period, the number of construction trucks traveling to and from the site would vary depending on the phase and the type of construction activity. North McDonnell Road, West Field Road, and West Campus Drive would be used to access the project site. Throughout construction of the modified project there would be additional construction trucks on these roadways, two of which (North McDonnell Road and West Field Road) have bicycle lanes and/or shared-lane striping. Thus, construction trucks entering the modified project site could affect pedestrians or people bicycling. The modified project would be required to implement the Airport Standard Construction Measure (ASCM) related to construction traffic (Division 01 55 26).[22] This ASCM requires that a Traffic and Pedestrian Detour Routing Plan be prepared by the contractor(s) to reduce project impacts on the surface transportation network, including people bicycling. The Plan must be based on the California Manual on Uniform Traffic Control Devices and in compliance with Airport traffic regulations and the San Francisco Police Department's Airport Bureau policy. The Plan also includes provisions for the storage and staging of construction vehicles, equipment, and materials, and requires the submittal and approval of a site-specific Traffic Control Plan for any road or lane closures. With implementation of a Traffic and Pedestrian Detour Routing Plan, construction trucks would not substantially affect pedestrians or bicyclists. Moreover, construction staging and delivery activities would occur on-site; materials and equipment would not be staged on sidewalks.

Temporary closures of travel lanes or sidewalks on West Field Road may be required at times during certain construction activities (e.g., curb, gutter, sidewalk replacement) associated with the modified project. Pedestrians would be directed to cross to the other side of the street. Transit operations at the adjacent SamTrans bus stop and AirTrain Station adjacent to the project site on North McDonnell Road would not be interrupted by construction activities. Any temporary traffic lane, bicycle lane, parking lane, or sidewalk closures would be required to conform to the Traffic and Pedestrian Detour Routing Plan, which would reduce the modified project's impacts.

The Master Plan FEIR did not identify any significant transportation and circulation impacts related to construction and did not require any mitigation measures. Compliance with the ASCM would be sufficient to reduce impacts to less-than-significant levels. Therefore, construction of the modified project would not create potentially hazardous conditions for pedestrians, bicycling, driving, or riding transit; would not interfere with emergency access; and would not interfere with accessibility for pedestrians or bicycling; and would not substantially delay transit. As such, the modified project would not result in significant construction-related impacts related to pedestrians, bicycling, driving, or taking public transit. As such, the modified project would not result in new significant impacts that were not previously identified in the Master Plan FEIR, would not result in more-severe impacts than those identified in the FEIR, and would not require new mitigation measures.

OPERATION

POTENTIALLY HAZARDOUS CONDITIONS

The new AirTrain improvements would minimize pedestrian crossings at the North McDonnell Road/West Field Road intersection by providing a direct pedestrian link from the office buildings and parking garage

[22] San Francisco International Airport. *Airport Standard Construction Measures Implementation in Construction Contracts and Maintenance Projects*, March 3, 2020.

to the AirTrain Station. SamTrans would continue to provide service to the existing bus stop on the north side of the North McDonnell Road/West Field Road intersection. Existing bicycle facilities on North McDonnell Road and West Field Road would remain unchanged with implementation of the modified project.

Bicycle and pedestrian impacts were determined to be less than significant in the Master Plan FEIR and no mitigation measures were required. The Master Plan FEIR did not address potentially hazardous conditions as it relates to driving or transit operations. Project operations would result in less-than-significant impacts related to potentially hazardous conditions for pedestrians, bicycling, or driving and public transit, and no mitigation measures are required. Therefore, the modified project would not result in new significant impacts that were not previously identified in the Master Plan FEIR, would not result in more-severe impacts than those identified in the FEIR, and would not require new mitigation measures.

GENERAL ACCESSIBILITY AND EMERGENCY ACCESS

As discussed above, pedestrian and bicycle access would continue to be provided on sidewalks and streets adjacent to the project site with implementation of the modified project. Additionally, the proposed improvements to the AirTrain station access would minimize pedestrian crossings at the North McDonnell Road/West Field Road intersection by providing a direct pedestrian link from the office buildings and parking garage to the AirTrain Station. The modified project would not introduce unsafe design features or incompatible uses, or restrict emergency vehicles from accessing the site or nearby areas. Similarly, the modified project would not generate activities that would interfere with access or circulation for pedestrians or bicyclists.

The FEIR did not identify impacts on pedestrians and bicycling and the FEIR did not specifically address emergency access. However, the modified project would not result in new significant impacts that were not previously identified in the Master Plan FEIR, would not result in more-severe impacts than those identified in the FEIR, and would not require new mitigation measures.

TRANSIT

The Transportation Impact Analysis Guidelines for Environmental Review[23] set forth a screening criterion for projects that would typically not result in significant impacts related to public transit delay. As discussed above, the modified project would not cause an increase in travel demand as compared to the Master Plan FEIR, and therefore would not result in additional vehicle trips that could cause delay to transit vehicles operating near the modified project site. Based on this determination, the modified project would generate fewer than 300 vehicle trips during the p.m. peak hour, which is the screening criterion for transit delay. Therefore, the modified project meets the screening criterion, and impacts on transit delay and operations would be less than significant.

The Master Plan FEIR discussed increased transit loadings on BART, Caltrain, and SamTrans, but did not identify any potentially significant impacts with respect to transit delay or transit capacity utilization, and no mitigation measures were required. The planning department no longer considers transit capacity utilization impacts, but rather whether implementation of a project would increase transit travel times and substantially delay transit or create potentially hazardous conditions for transit operations. For the reasons described above, operation of the modified project would not substantially delay transit, and the

[23] San Francisco Planning Department, Transportation Impact Analysis Guidelines Update: Summary of Changes Memorandum, February 14, 2019, last updated in October 2019, *https://citypln-m-extnl.sfgov.org/SharedLinks.aspx?accesskey=79b86615648b30738b5be29ce1d6be428adebe8ad75a7e1d3cc064a715634ec5&VaultGUID=A4A7DACD-B0DC-4322-BD29-F6F07103C6E0*, accessed January 19, 2021.

modified project impacts related to transit would be less than significant and no mitigation measures are required. Therefore, the modified project would not result in new significant impacts that were not previously identified in the Master Plan FEIR, would not result in more-severe impacts than those identified in the FEIR, and would not require new mitigation measures.

VEHICLE MILES TRAVELED ASSESSMENT

As discussed above under the modified project description, the additional office/administration space would not generate new employees at the Airport. Rather, employees from other buildings at the Airport, such as Building 710, Building 575, and the terminal complex, would relocate to the new Building 670. Therefore, the modified project would not cause an increase in travel demand as compared to the Master Plan FEIR, and would not result in additional vehicle miles traveled (VMT). Furthermore, the project site meets the proximity to transit stations screening criterion due to its location less than a half-mile from the BART San Francisco International Airport Station, a major transit stop.[24] In addition to BART, the project site is directly served by the AirTrain and SamTrans 292, 397, and 398 bus routes. As such, the modified project would not result in a substantial increase in VMT.

The modified project would include features that would alter the transportation network. These features include reconstructed sidewalks, new or relocated driveways, and new pedestrian facilities to accommodate access between the parking garage and the CAC buildings, and between the parking garage and the adjacent AirTrain Station. These types of transportation network alterations qualify as "active transportation, rightsizing (aka Road Diet) and Transit Project," or "other minor transportation project" as defined in the Transportation Impact Analysis Guidelines for Environmental Review.[25] The planning department has determined that these categories of transportation network alterations would not substantially induce automobile travel.

The Master Plan FEIR did not analyze impacts related to VMT or substantially inducing automobile travel. However, for the reasons noted above, modified project would result in less-than-significant impacts related to VMT and induced automobile travel, and no mitigation measures are required. Therefore, the modified project would not result in new significant impacts that were not previously identified in the Master Plan FEIR, would not result in more-severe impacts than those identified in the FEIR, and would not require new mitigation measures.

LOADING

With regard to loading, all temporary and permanent loading would occur on Airport property, and not within public rights-of-way. Moreover, internal roadways within the project site would be able to accommodate any queuing or double-parked vehicles from passenger or freight loading activities. Therefore, the modified project would not result in secondary impacts on people bicycling and public transit delay; would not result in any new or substantially greater impacts with respect to loading beyond those identified in the Master Plan FEIR; and no new mitigation measures would be required.

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[24] The planning department's transportation impact analysis guidelines identified that the modified project meets the definition of a small project (per the planning department's transportation impact analysis guidelines), which is a project that would not result in over 100 vehicle trips per day or would have less than or equal to 10,000 square feet of retail.

[25] San Francisco Planning Department, Transportation Impact Analysis Guidelines Update: Summary of Changes Memorandum, February 14, 2019, last updated in October 2019, *https://citypln-m-extnl.sfgov.org/SharedLinks.aspx?accesskey=79b86615648b30738b5be29ce1d6be428adebe8ad75a7e1d3cc064a715634ec5&VaultGUID=A4A7DACD-B0DC-4322-BD29-F6F07103C6E0*, accessed January 19, 2021.

PARKING

As shown in **Table 1**, p. 5, the modified project would construct a 1,400-space parking garage resulting in a net increase of 1,105 spaces, as compared to existing conditions. However, even with this increase, the total number of employee parking spaces would constitute 15 percent of the total amount of parking analyzed in the Master Plan FEIR (the Master Plan analyzed a net increase of 7,340 spaces). The ratio of parking spaces to employees with implementation of the modified project would be approximately 0.29, compared to a comparable ratio of 0.44 as analyzed in the FEIR. Therefore, because the modified project would proportionally reduce the ratio of employee parking spaces to employees, as compared to that analyzed in the Master Plan FEIR, the modified project would not conflict with efforts to reduce single-occupancy vehicle travel. It is noted that a parking shortfall, in itself, does not result in a significant impact on the environment. Secondary effects related to safety or accessibility for pedestrians, bicycling, or driving; emergency access; and delays to public transit, would not occur due to the fact that parking would be for Airport employees only, and any vehicles turned away from the project site in the unlikely case that the parking garage reaches capacity would be redirected to other nearby Airport parking facilities. Furthermore, the project site is accessible by other travel modes (e.g., BART, AirTrain, SamTrans) that could be used by employees as an alternative to driving and parking if parking availability was in question. As such, the modified project would not result in new significant impacts that were not previously identified in the Master Plan FEIR, would not result in more-severe impacts than those identified in the FEIR, and would not require new mitigation measures.

CUMULATIVE IMPACTS

The cumulative context for transportation and circulation impacts is typically localized, in the immediate vicinity of the project site or at the neighborhood level. While the current context of cumulative projects has changed from that analyzed in the Master Plan FEIR (Table 2, p. 13), this revised cumulative context would not result in a change in the conclusions set forth in the FEIR regarding the potential for cumulative impacts. As noted above, the modified project would result in an increase of 260,340 square feet of office/administration space compared to that analyzed in the Master Plan FEIR. However, the modified project would not cause an increase in travel demand as compared to the Master Plan FEIR, and therefore would not result in any new or increased severity of transportation impacts identified in the Master Plan FEIR. As such, the modified project would not combine with other projects in the vicinity to result in a significant cumulative impact; therefore, no further analysis is necessary.

Noise

MASTER PLAN FEIR FINDINGS

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

The FEIR determined that pile driving, if needed during construction activities, would affect nearby residential areas located west of the Airport. The Master Plan FEIR concluded (p. 435) that construction pile-driving noise, while temporary, would be significant and would exceed the State Department of Health Services' Recommended Land Use Compatibility Guidelines for Community Noise.[26] However,

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

temporary construction noise impacts associated with implementation of the Master Plan have been avoided or substantially lessened, to the maximum extent possible, through implementation of mitigation measures specified in the MMRP for the Master Plan FEIR. To the extent that construction noise mitigation measures specified in the MMRP might not avoid or substantially lessen the impacts of Master Plan projects, the Airport Commission made the finding that the environmental, economic, and social benefits of the Master Plan would override the remaining impacts related to construction noise, as stated fully in the Airport Commissions adoption of the Statement of Overriding Considerations.[27]

The FEIR analyzed future peak-hour operational noise from vehicles on U.S. 101 and local roads that serve the Airport and determined that the Master Plan projects would yield a net increase of 2 decibels (dB) higher than existing ambient noise levels on the roads. The FEIR concluded that a 2 dB noise level increase would not be perceptible to people, and thus would not exceed the applicable threshold of an increase of 5 A-weighted decibels (dBA). Therefore, the FEIR determined that operational ground-level vehicle traffic would be less than significant.

MODIFIED PROJECT IMPACTS

CONSTRUCTION NOISE AND VIBRATION

The nearest sensitive receptors to the project site are the Belle Air Elementary School at 450 Third Avenue in San Bruno (approximately 1,500 feet northwest of the project site and U.S. 101) and single family residences at Seventh Avenue in San Bruno (approximately 1,600 feet northwest of the project site and U.S. 101).

The duration of construction for the modified project would be 45 months; however, pile driving activities are not anticipated to be required for the modified project because the reinforced concrete piles would be predrilled to bedrock, cast in place, and then capped. Other construction activities associated with the modified project, including demolition, grading, excavating, compacting soil, and comparable activities, would be similar to those described in the Master Plan FEIR. Heavy construction equipment, including excavators, construction cranes, and dump trucks, may cause temporary increases in vibration levels near the project site. Due to the types of land uses in the area immediately surrounding the modified project site and the approximately 1,500-foot distance to the nearest sensitive receptor (Belle Air Elementary School), construction noise would not have a substantial impact on or near the site or on any sensitive receptors.

Nevertheless, the modified project would implement the following Master Plan FEIR mitigation measures: **Mitigation Measures I.C.1.a, Noise Reduction Measures**; **I.C.1.b, Predrilling Holes**; and **I.C.1.d., Construction Barriers**, as well as the ASCM regarding noise reduction strategies during construction (Division 01 57, 00).[28] These measures require construction contractors to: muffle and shield construction vehicles and to use electric power rather than diesel-power, as feasible; predrill holes for foundation piles; and install barriers around the site and stationary equipment, and, if possible, to locate such equipment in pitted/excavated areas. Therefore, the modified project would not result in new significant noise impacts that were not previously identified in the Master Plan FEIR, would not result in

[27] Airport Commission, SFO Master Plan, *Findings Related to the Approval of the SFIA Master Plan*, November 3, 1992, pp. 58 to 62.

[28] San Francisco International Airport, *Airport Standard Construction Measures Implementation in Construction Contracts and Maintenance Projects*, March 3, 2020.

more-severe noise impacts than those identified in the FEIR, and would not require new mitigation measures.

Construction of the modified project would not require the use of pile drivers; therefore, construction-related vibration impacts caused by pile driving would not occur. Construction activities would include demolition, grading, and excavation, which would have the potential to generate low levels of groundborne vibration from vibratory rollers, hoe rams, large bulldozers, caisson drilling, loaded trucks and jackhammers. As such, any existing structures located within 25 feet of the project site could be exposed to the generation of excessive groundborne vibration or groundborne noise levels related to construction activities since equipment could exceed the criteria of 0.2 inches per second applicable to fragile and historic structures.[29]

As shown in **Table 3**, construction vibration levels could reach as high as approximately 0.21-inch-per-second peak particle velocity at 25 feet from the source, depending on the type of construction equipment in use. Construction activity that would occur closest to existing structures would be road and access modifications, which would occur 50 and 70 feet from Buildings 676 and 679, respectively. These vibration levels would be below the building damage thresholds (0.5 peak particle velocity) for non-historic structures. Therefore, the modified project would not result in new significant impacts that were not previously identified in the Master Plan FEIR, would not result in more-severe impacts than those identified in the FEIR, and would not require new mitigation measures.

Table 3 Vibration Source Levels for Construction Equipment

Equipment	Approximate peak particle velocity (in/sec)		
	25 Feet (reference)	50 Feet	70 Feet
Vibratory Compactor	0.21	0.10	0.068
Caisson Drill and Hoe Ram	0.089	0.042	0.029
Loaded Trucks	0.076	0.035	0.024
Jackhammer	0.035	0.016	0.011

SOURCE: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

TRAFFIC-GENERATED NOISE

The modified project includes 260,340 square feet more office/administration space than that analyzed in the Master Plan FEIR and, as discussed above under the modified project description, the additional office/administration space would not generate new employees at the Airport. Rather, employees from other buildings at the Airport, such as Building 710, Building 575, and the terminal complex, would relocate to the new Building 670. Therefore, the modified project would not generate additional vehicle trips. As such, there would be no incremental increase in traffic that could result in a measurable difference in traffic noise, and the modified project would not result in new significant impacts that were

[29] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, FTA Report No. 0123, September 2018, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf, accessed March 26, 2021.

not previously identified in the Master Plan FEIR, would not result in more-severe impacts than those identified in the FEIR, and would not require new mitigation measures.

OPERATIONAL NOISE

Operational noise would likewise be comparable to that identified in the Master Plan FEIR since the modified project includes the same types of buildings and mechanical equipment as analyzed in the FEIR. In addition, relocation of the AirTrain mechanical facility would move this existing noise source 60 feet to the north and into an enclosed building, resulting in negligible impacts on sensitive receptors. The modified project would have no effect on air travel and thus would not result in any changes in aircraft noise as compared to the analysis in the Master Plan FEIR.

Based on the above, the modified project would not result in any new significant noise impacts beyond those identified in the FEIR or substantially increase the severity of a significant impact, and no new mitigation measures would be required.

CUMULATIVE IMPACTS

With the exception of the Shoreline Protection Program, the other cumulative projects identified in Table 2, p. 13, would include drilling and cast-in-place pile installation techniques that would avoid noise impacts associated with impact or vibratory pile driving and only result in noise from standard construction equipment such as from excavators, rollers, hoe rams, bulldozers, drill rigs, cranes, forklifts and jackhammers. Where pile driving or vibratory pile driving would occur as part of the Shoreline Protection Program, these areas are over 4,000 feet from the modified project site. At this distance, noise from impact pile driving would be reduced to 56 dBA, which is well below the existing noise level at the project site. The distance of these cumulative projects from the modified project and the nearest sensitive receptors would be sufficient to avoid cumulative construction noise impacts from standard construction equipment activities. With respect to cumulative vibration impacts, the distance between the modified project and cumulative projects would be sufficient to attenuate vibration contributions from these other projects to below the most stringent standard of 0.2 inches per second applicable to fragile and historic structures. Therefore, the modified project would not combine with other projects in the vicinity to result in a significant cumulative impact, and no further analysis is required.

Air Quality

MASTER PLAN FEIR FINDINGS

Air quality impacts of Master Plan projects are analyzed on pp. 171 to 177 and pp. 353 to 365 of the Master Plan FEIR. The Master Plan FEIR determined construction-related air quality impacts would be less than significant, and identified significant and unavoidable impacts with respect to hydrocarbons (HC), nitrides of oxygen (NOx), carbon monoxide (CO), sulfur oxides (SOx), and coarse particulate matter (PM_{10}) emissions from operations. Reactive organic gases (ROG) and fine particulate matter ($PM_{2.5}$) were not included as pollutants of concern at the time of the Master Plan FEIR, as discussed below. The Master Plan FEIR did not analyze potential health risk or odor impacts associated with construction or operation of the Master Plan projects. The Master Plan FEIR combined all Master Plan projects in its air quality analysis and did not disclose air quality impacts for individual projects or land use types. Therefore, the FEIR includes emissions from aircraft and ground support vehicles, as well as the construction and operation of administrative facilities, such as the CAC.

The construction air quality impact analysis in the Master Plan FEIR qualitatively analyzed fugitive dust emissions and concluded that construction activities have the potential to cause ambient concentrations to exceed the state average of 50 micrograms per cubic meter ($\mu g/m^3$) without construction. With implementation of Mitigation Measure I.B.1.a, Construction Period Activities (includes implementation of construction period measures to reduce emissions of particulates and other pollutants), the Master Plan FEIR concluded that impacts from construction emissions of PM_{10} would be reduced to less than significant. The Master Plan FEIR stated that hydrocarbons would be emitted from paving activities, and other criteria pollutants would be emitted from construction vehicles and equipment. These emissions were found to be less than significant because they were temporary and would only incrementally contribute to local and regional air quality.

Operational impacts were assessed for two operational years: 1992 and 2006. **Table 4** shows the operational emissions as disclosed in the Master Plan FEIR. As shown in the table, emissions of HC, NOx, CO, SOx, and PM_{10} were expected to exceed applicable thresholds. The Master Plan FEIR found that with implementation of Mitigation Measures I.A.1.a, Fund and Implement a Transportation System Management; I.B.1.b, Manage Aircraft Operating Procedures; and l.B.1.c Adopt the Transportation System Management Program,[30] operational emissions from the Master Plan would be reduced, but not to less-than-significant levels.

Table 4 Master Plan FEIR – Total Daily Air Pollutant Emissions

	HC	NOx	CO	SOx	PM_{10}	ROG & $PM_{2.5}$[a]
			POUNDS PER DAY			
1996	3,800	4,000	17,600	0	1,200	NA
2006	11,000	8,400	48,600	200	3,400	NA
Exceed Threshold?	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	NA

SOURCE: Master Plan FEIR Table 61, p. 364.

NOTE:

[a] ROG and $PM_{2.5}$ were not considered in the Master Plan FEIR.

REGULATORY CONTEXT

The Bay Area Air Quality Management District is the regional air quality management agency with jurisdiction over the nine-county San Francisco Bay Area Air Basin (SFBAAB), which includes San Francisco, Alameda, Contra Costa, Marin, San Mateo, Santa Clara, and Napa Counties, as well as portions of Sonoma and Solano Counties. The air district is responsible for ensuring that air quality in the SFBAAB attains and maintains federal and state ambient air quality standards, as established by the federal Clean Air Act (CAA) and the California Clean Air Act (CCAA), respectively. State and federal ambient air quality standards have been established for the following six criteria air pollutants: ozone, CO, particulate matter (PM), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead.

[30] San Francisco International Airport, *Exhibit B to Findings, Mitigation Monitoring Program, San Francisco International Airport Master Plan Mitigation Measures*, November 3, 1992.

The Master Plan FEIR did not consider ROG or $PM_{2.5}$ as pollutants of concern. At the time of the Master Plan FEIR, hydrocarbons were analyzed instead of ROG and the United States Environmental Protection Agency had yet to consider $PM_{2.5}$ separate from PM_{10}. Since that time, both pollutants have been added as pollutants of concern. As noted above, the Master Plan FEIR also did not discuss potential health risk or odor impacts related to construction or operational activities of the Master Plan; however, both health risk and odor impacts are discussed qualitatively in the analysis herein consistent with the CEQA Guidelines.

The 2017 Bay Area Clean Air Plan is the applicable planning document for the air district. The 2017 Clean Air Plan, among other aspects, limits fossil fuel combustion, promotes clean fuels, accelerates low carbon buildings, advances electric vehicles, and promotes making buildings cleaner and more efficient. The modified project would be required to comply with the 2017 Clean Air Plan. Consistency with the 2017 Clean Air Plan is discussed in detail in the *Consistency with the 2017 Clean Air Plan* section below.

APPROACH TO ANALYSIS

The Master Plan FEIR did not separate emissions by land use or for individual Master Plan projects. Therefore, to provide a basis for comparison to the emissions that would be generated during construction of the modified project, this analysis quantifies emissions associated with construction of the Master Plan administration facilities and emissions associated with construction of the modified project.

The Master Plan FEIR assumed construction of the Master Plan would start in 1990 and be complete and fully operational in 2006. However, construction of the entirety of the Master Plan administrative facilities would not require 16 years of continuous construction activity. Based on the size of the Master Plan administration facilities, it would have taken approximately two years to construct the second phase, whereas the modified project is expected to require approximately 45 months of construction.[31] This analysis assumes that the construction timeline for the second phase of the Master Plan administration facilities would have started as early as 1996, after construction of the first phase of the administration facilities was completed, with construction of the second phase completed in 1998 and fully operational by the year 2000.[32] The current analysis uses historic emission rates for off-road and on-road emissions for the purpose of quantifying emissions associated with the Master Plan. Historic operational emissions are associated with energy intensity and land-use factors based on construction in the 1990s.[33]

Emissions associated with the modified project are based on emission factors for off-road and on-road vehicles associated with construction years of 2022 through 2025 and an operational year of 2026. To estimate the net operational emissions, the analysis herein is based on the net increase in square footage of the administrative facilities proposed under the modified project (existing office/administrative space in Building 676, which is to be demolished, is subtracted from the modified project's new square footage). This is a conservative approach because instead of reducing the modified project's operational emissions starting in 2023 (the year the building would be demolished), it reduces the modified project's operational emissions starting in 2026 (the demolished building square footage is subtracted from the modified project's new square footage, which would be operational in 2026).

[31] For example, the modeled square footage of the Master Plan administration facilities is approximately 14 percent of the proposed square footage for the modified project. Thus, the building construction timeline for the Master Plan administration is scaled back proportionally.

[32] While it was estimated that the Master Plan administration facilities would be operational by 1999, EMFAC2017 (CARB's emissions model for mobile sources) does not provide emission rates years prior to 2000. Therefore, on-road construction and operational emissions were modeled using the 2000 model year emission rates instead of the actual construction years (1996 through 1998) and the operational year of 2000.

[33] Environmental Science Associates, *SFO Consolidated Administration Campus: Air Quality Supporting Information*, May 17, 2021.

Construction off-road source emissions and operational non-mobile source emissions were modeled using CalEEMod version 2016.3.2. On-road mobile emissions associated with construction and operational vehicle trips were modeled using EMFAC2017 emission factors. An off-model adjustment factor was applied to account for the Safer Affordable Fuel-Efficient Vehicles Rule Part One (SAFE rule).[34]

With respect to the criteria pollutants analyzed, although hydrocarbons were analyzed in the Master Plan FEIR, they are no longer considered a pollutant of concern and therefore were not analyzed as part of the modified project air quality analysis. Conversely, although ROG and $PM_{2.5}$ were not analyzed in the Master Plan FEIR, they are currently considered pollutants of concern and are thus analyzed herein. [35]

As discussed above, California Air Resources Board (CARB) has implemented a number of regulations to reduce pollutant emissions from mobile sources. These regulations govern the emissions standards, and therefore the emission factors that were used to estimate mobile source emissions for both the Master Plan and the modified project. The regulations have reduced emissions significantly since the early 1990s to the present. EMFAC2017 was used to model mobile emissions, which takes into account the emission factors for vehicles based on their model year and the year of operation. In general, emission factors have decreased between 1992 and 2026 (operational year for the modified project) due to the regulations put in place by CARB, which result in increased efficiency and reduced pollutant emissions for newer model year vehicles.[36]

MODIFIED PROJECT IMPACTS

CONSTRUCTION

CRITERIA AIR POLLUTANTS AND FUGITIVE DUST

Construction equipment is a major source of pollution within the state. CARB has implemented regulations to reduce emissions from off-road construction equipment, such as those that would be used for the modified project. In 2014, CARB implemented the Regulation for In-use Off-Road Diesel-Fueled Fleets (Off-Road Regulation) to ensure that older, less efficient equipment fleets are replaced with newer, cleaner fleets. In addition to idling being limited to 5 minutes or less in any one location, CARB regulations require that by January 2019 all fleets must meet average emissions targets or implement best available control technologies to reduce fleet emissions. The modified project would result in more construction activity than envisioned in the Master Plan, specifically related to administration/office facilities, and would require a longer construction period with more construction equipment. However, given the implementation of the Off-Road Regulation, emissions from the larger construction fleet would be less than the administration facilities construction fleet emissions analyzed in the Master Plan FEIR. Additionally, compliance with the ASCM regarding dust control during construction (Division 01 57 00)[37]

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[34] U.S. Environmental Protection Agency (EPA) and National Highway Traffic Safety Administration (NHTSA), September 27, 2019, "Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program," (84 Federal Register 51,310).

[35] Reactive Organic Gas (ROG) includes any compound of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, and other low-reactive organic compounds such as methane and ethane. Hydrocarbons (HC) are organic chemical compounds composed entirely of hydrogen and carbon, such as methane and ethane compounds. ROG includes HC compounds, except for a few exempt HC compounds due to their low reactivity, such as methane and ethane, which are expected to have low ozone formation impacts in the near-term.

[36] Environmental Science Associates, *SFO Consolidated Administration Campus: Air Quality Supporting Information*, May 17, 2021.

[37] San Francisco International Airport. *Airport Standard Construction Measures Implementation in Construction Contracts and Maintenance Projects*, March 3, 2020.

would reduce the modified project's impact regarding fugitive dust emissions to less than significant, as discussed in further detail below. **Table 5** shows the construction emissions estimated for the modified project compared to the construction emissions estimated for the Master Plan administration facilities. Both emissions scenarios include implementation of fugitive dust reduction as required based on the year construction would occur. As shown in Table 5, the modified project would have less daily construction emissions than administration facilities analyzed in the Master Plan FEIR. Construction of the modified project would not change the conclusions of the FEIR with respect to construction emissions. Likewise, the modified project would not result in a new significant impact or a substantial increase in the severity of construction emissions impacts compared to the Master Plan FEIR.

Table 5 Regional Construction Emissions (Unmitigated) (lbs/day)

	ROG	NOx	CO	SOx	PM_{10}[a]	$PM_{2.5}$[a]
MAXIMUM DAILY – MASTER PLAN ADMINISTRATION FACILITIES						
1996	16	95	76	4	6	6
1997	32	190	151	8	13	13
1998	143	324	217	15	24	24
Maximum Daily	*143*	*324*	*217*	*15*	*24*	*24*
MAXIMUM DAILY – MODIFIED PROJECT						
2022	1	6	6	<1	<1	<1
2023	2	27	30	<1	1	1
2024	6	64	77	<1	2	2
2025	104	37	68	<1	1	1
Maximum Daily	*104*	*64*	*77*	*<1*	*2*	*2*
Difference	**(39)**	**(260)**	**(139)**	**(14)**	**(22)**	**(22)**

SOURCE: ESA 2020.

NOTES:

Emission quantities are rounded to "whole number" values. Therefore, the "total" values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the CalEEMod model printout sheets and/or calculation worksheets that are presented in Environmental Science Associates, *SFO Consolidated Administration Campus: Air Quality Supporting Information*, May 17, 2021.

[a] PM_{10} and $PM_{2.5}$ emission estimates are based on compliance with air district methodology and only addresses exhaust emissions. Fugitive emissions are discussed qualitatively.

With implementation of the ASCM regarding dust control during construction, the modified project would not result in any new dust-related air quality impacts beyond those identified in the Master Plan FEIR or substantially increase the severity of a significant impact, and no new mitigation measures would be required.

HEALTH RISK AND HEALTH HAZARDS

With respect to construction health risks, heavy equipment, including construction equipment, generates emissions of toxic air contaminants (TACs) such as diesel particulate matter, which has been identified as a carcinogen by the California Office of Environmental Health Hazard Assessment. The air district recommends that a health risk assessment be conducted when sources of TACs are within 1,000 feet of

sensitive receptors. However, given that there are no residences, schools, childcare centers, or other such sensitive land uses within 1,000 feet of the modified project site (the closest sensitive receptor is Belle Air Elementary School located approximately 1,500 feet west of the modified project site), a quantitative construction health risk analysis is not warranted and the modified project would not result in health risk impacts on any sensitive receptors. Therefore, the modified project would not result in a new significant air quality impact related to construction or a substantial increase in the severity of air quality impacts identified in the Master Plan FEIR, and no new mitigation measures would be required.

OPERATION

CRITERIA AIR POLLUTANTS

A comparison between the modified project's operational emissions and the Master Plan administration facilities operational emissions is provided in **Table 6**. As shown in the table, the modified project would result in reduced daily operational emissions compared to the administration facilities envisioned in the Master Plan. As such, operation of the modified project would not change the conclusions of the Master Plan FEIR. Therefore, the modified project would not result in a new significant air quality impact related to operation or a substantial increase in the severity of air quality impacts identified in the Master Plan FEIR, and no new mitigation measures would be required.

CARBON MONOXIDE HOTSPOTS

The Master Plan FEIR states that by 2006, the CO standard would be violated at one intersection and at three intersections under the 1992 traffic conditions. As indicated in Table 6, the modified project's emissions of CO would be less than emissions of CO in the Master Plan FEIR. The overall decrease in CO emissions from vehicles has reduced CO hotpot impacts substantially throughout the state. Therefore, because the modified project would be built more than a decade after it was originally planned to be constructed, the modified project would not result in a new significant impact related to emissions from CO or a substantial increase in the severity of impact compared to those in the FEIR, and no new mitigation measures would be required.

CONSISTENCY WITH THE 2017 CLEAN AIR PLAN

Through implementation of Master Plan FEIR Mitigation Measure I.B.1.a, the FEIR demonstrated that Master Plan projects would be consistent with the Bay Area 1991 Clean Air Plan. With implementation of ASCM Division 01 57 00 regarding dust control during construction, the modified project would be consistent with the control measures listed in the 2017 Clean Air Plan, the region's current air quality plan. Additionally, the modified project would not disrupt, delay, or otherwise hinder implementation of the 2017 Clean Air Plan. Control strategies in the 2017 Clean Air Plan that are applicable to the modified project include reducing motor vehicles by promoting alternative travel, accelerating widespread adoption of electric vehicles, and promoting energy and water efficiencies in both new and existing buildings. The modified project would comply with these strategies through the implementation of the AirTrain platform and pedestrian bridge, which would provide easy access from the CAC to alternative forms of transportation. Additionally, the modified project would install charging stations in the proposed parking structure to accommodate electric city carshare vehicles and promote the use of electric vehicles. Finally, the modified project would be consistent with the 2019 Title 24 building standards, which require reductions to building energy and water consumption associated with office building land uses. Therefore, the modified project would be consistent with the 2017 Clean Air Plan.

Table 6 Regional Operational Emissions (Unmitigated) (lbs/day)

	ROG	NOx	CO	SOx	PM_{10}	$PM_{2.5}$
MAXIMUM DAILY – MASTER PLAN ADMINISTRATION FACILITIES						
Area	2	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	17	33	145	<1	8	3
Stationary Source (Emergency Generator)	<1	8	9	<1	<1	<1
Maximum Daily	*19*	*41*	*155*	*<1*	*9*	*3*
MAXIMUM DAILY – MODIFIED PROJECT						
Area	8	<1	<1	<1	<1	<1
Energy	<1	1	1	<1	<1	<1
Mobile	2	2	12	<1	4	1
Stationary Source (Emergency Generator)	<1	<1	3	<1	<1	<1
Maximum Daily	*9*	*3*	*16*	*<1*	*4*	*1*
Difference	**(9)**	**(38)**	**(138)**	**0**	**(4)**	**(2)**

SOURCE: ESA 2020.

NOTES:

Emission quantities are rounded to "whole number" values. Therefore, the "total" values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the CalEEMod model printout sheets and/or calculation worksheets that are presented in Environmental Science Associates, *SFO Consolidated Administration Campus: Air Quality Supporting Information*, May 17, 2021.

HEALTH RISK AND HEALTH HAZARDS

With respect to operational health risks, common types of TAC and $PM_{2.5}$ emissions include gasoline stations, dry cleaners, and diesel backup generators, as well as on-road diesel and gasoline vehicles. The sources of TAC and $PM_{2.5}$ emissions associated with the operations of the modified project are a diesel-fueled emergency back-up generator and on-road diesel and gasoline vehicles. The emergency back-up generator would be a Tier 4 generator and would comply with the air district's permitting requirements. Given that the generator would be similar in size and would be cleaner and more efficient than those envisioned in the Master Plan FEIR, the modified project's potential health risk during operation would be less than that of the administration/office facilities envisioned in the Master Plan. Additionally, the air district's permitting regulations would ensure that the emergency generator would not result in significant health risk to nearby receptors. As described above under the modified project description, the modified project would not result in an increase in employees; thus, the modified project would not increase annual VMT. In addition, operation of the modified project would involve more efficient vehicles than would have occurred under the original operational year for the administration facilities in the Master Plan. Therefore, the modified project would result in less emissions from mobile sources as shown in Table 5, and accordingly, less potential for adverse health risk, than were disclosed in the Master Plan. Additionally, the air district recommends that a health risk assessment be conducted when risk sources are within 1,000 feet of sensitive receptors. Because the modified project would operate more efficiently and cleaner than the Master Plan administration facilities analyzed in the Master Plan FEIR, and given that there no residences, schools, childcare centers, or other such sensitive land uses within 1,000 feet of the modified project site, a

quantitative operational health risk analysis is not warranted. Therefore, the modified project would not result in a new significant health risk impact or a substantial increase in the severity of impacts disclosed in the Master Plan FEIR, and no new mitigation measures would be required.

ODORS

The Master Plan FEIR did not analyze potential odor impacts associated with Master Plan projects.

Typical odor sources of concern include wastewater treatment plants, sanitary landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing facilities, fiberglass manufacturing facilities, auto body shops, rendering plants, and coffee roasting facilities. During construction, diesel exhaust from construction equipment would generate some odors. However, construction-related odors would be temporary and would not persist upon construction completion. During operations, the modified project's administration office and parking uses would not generate substantial odors of concern.

Given that the modified project is consistent with the land uses analyzed in the Master Plan FEIR, the modified project would not result in any new significant air quality or odor impacts or substantially increase the severity of a significant impact, and no new mitigations measures would be required.

CUMULATIVE IMPACTS

Regional air pollution is by its very nature a cumulative impact. Emissions from cumulative projects contribute to the region's adverse air quality on a cumulative basis. No single project by itself would be sufficient in size to result in regional nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulative adverse air quality impacts.[38]

The modified project would not exceed the Master Plan FEIR's construction or operational emissions of criterial air pollutants; therefore, the modified project would not result in any significant cumulative impacts that were not previously identified in the FEIR.

The modified project would add new sources of TACs (e.g., construction emissions). However, given that there are no residences, schools, childcare centers, or other such sensitive land uses within 1,000 feet of the modified project site, the modified project would not contribute to a significant cumulative impact related to health risks that was not previously identified in the Master Plan FEIR. The modified project also would not combine with other projects in the vicinity to result in a significant cumulative impact; therefore, no further analysis is necessary.

Greenhouse Gas Emissions

MASTER PLAN FEIR FINDINGS

Climate change and greenhouse gas (GHG) impacts of Master Plan projects were not addressed in the 1992 FEIR, as this topic was not mandated for inclusion under CEQA until 2007.

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

MODIFIED PROJECT IMPACTS

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

The air district has prepared guidelines and methodologies for analyzing GHGs. These guidelines are consistent with CEQA Guidelines sections 15064.4 and 15183.5, which address the analysis and determination of significant impacts from a proposed project's GHG emissions. CEQA Guidelines section 15064.4 allows lead agencies to rely on a qualitative analysis to describe GHG emissions resulting from a project. CEQA Guidelines section 15183.5 allows for public agencies to analyze and mitigate GHG emissions as part of a larger plan for the reduction of GHGs and describes the required contents of such a plan. Accordingly, San Francisco has prepared Strategies to Address Greenhouse Gas Emissions,[39] which presents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco's qualified GHG reduction strategy in compliance with the CEQA Guidelines. These GHG reduction actions have resulted in a 35 percent reduction in GHG emissions in 2015 compared to 1990 levels,[40] exceeding the year 2020 reduction goals outlined in the air district's 2018 Clean Air Plan, Executive Order (EO) S-3-05, and Assembly Bill (AB) 32 (also known as the Global Warming Solutions Act).[41]

Given that the City has met the state and region's 2020 GHG reduction targets and San Francisco's GHG reduction goals are consistent with, or more aggressive than, the long-term goals established under EO S-3-05,[42] EO B-30-15,[43,44] and Senate Bill (SB) 32[45,46] the City's GHG reduction goals are consistent with EO S-3-05, EO B-30-15, AB 32, SB 32, and the 2017 Clean Air Plan. Therefore, proposed projects that are consistent with the City's GHG reduction strategy would be consistent with the aforementioned GHG

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[39] San Francisco Planning Department, 2017 Greenhouse Gas Reduction Strategy Update, July 2017, https://sfplanning.org/project/greenhouse-gas-reduction-strategies, accessed November 2020.

[40] San Francisco Department of the Environment, San Francisco's Carbon Footprint, https://sfenvironment.org/carbon-footprint, accessed February 23, 2021.

[41] EO S-3-05, AB 32, and the air district's 2017 Clean Air Plan (continuing the trajectory set in the 2010 Clean Air Plan) set a target of reducing GHG emissions to below 1990 levels by year 2020.

[42] Office of the Governor, *EO S-3-05*, June 1, 2005, http://static1.squarespace.com/static/549885d4e4b0ba0bff5dc695/t/54d7f1e0e4b0f0798cee3010/1423438304744/California+Executive+Order+S-3-05+(June+2005).pdf, accessed March 26, 2021. EO S-3-05 sets forth a series of target dates by which statewide emissions of GHGs need to be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels (approximately 457 million metric tons of carbon dioxide equivalents [$MTCO_2e$]); by 2020, reduce emissions to 1990 levels (approximately 427 million $MTCO_2e$); and by 2050 reduce emissions to 80 percent below 1990 levels (approximately 85 million $MTCO_2e$). Because of the differential heat absorption potential of various GHGs, GHG emissions are frequently measured in "carbon dioxide-equivalents," which present a weighted average based on each gas's heat absorption (or "global warming") potential.

[43] Office of the Governor, Executive Order B-30-15, April 29, 2015, https://www.library.ca.gov/Content/pdf/GovernmentPublications/executive-order-proclamation/39-B-30-15.pdf, accessed March 26, 2021. Executive Order B-30-15, issued on April 29, 2015, sets forth a target of reducing GHG emissions to 40 percent below 1990 levels by 2030 (estimated at 2.9 million $MTCO_2e$).

[44] San Francisco's GHG reduction goals are codified in section 902 of the Environment Code and include: (i) by 2008, determine City GHG emissions for year 1990; (ii) by 2017, reduce GHG emissions by 25 percent below 1990 levels; (iii) by 2025, reduce GHG emissions by 40 percent below 1990 levels; and by 2050, reduce GHG emissions by 80 percent below 1990 levels.

[45] SB 32 amends California Health and Safety Code Division 25.5 (also known as the California Global Warming Solutions Act of 2006) by adding section 38566, which directs that statewide greenhouse gas emissions to be reduced by 40 percent below 1990 levels by 2030.

[46] SB 32 was paired with AB 197, which would modify the structure of the California State Air Resources Board; institute requirements for the disclosure of greenhouse gas emissions criteria pollutants, and toxic air contaminants; and establish requirements for the review and adoption of rules, regulations, and measures for the reduction of GHG emissions.

reduction goals, would not conflict with these plans or result in significant GHG emissions, and would therefore not exceed San Francisco's applicable GHG threshold of significance.

The following analysis of the modified project's impact on climate change focuses on the project's contribution to cumulatively significant GHG emissions. Because no individual project could emit GHGs at a level that could result in a significant impact on the global climate, this analysis is in a cumulative context, and this section does not include an individual project-specific impact statement.

CONSISTENCY WITH ADOPTED PLANS AND POLICIES

SFO first developed a Departmental Climate Action Plan in 2008 as a blueprint for meeting the objectives of the City's San Francisco's qualified GHG reduction strategy in compliance with the CEQA Guidelines (Ordinance 81-08). Consistent with the City's objectives, the Airport established actions that would help the city reduce its GHG emissions 25 percent below 1990 emissions by 2017, 40 percent below 1990 emissions by 2025, and 80 percent below 1990 emissions by 2050. In 2016, the Airport developed a 5-Year Strategic Plan, which established the following five sustainability goals for the years 2017–2021: achieve net zero energy at SFO; achieve zero waste; achieve carbon neutrality and reduce GHG emissions by 50 percent (from the 1990 baseline); implement a healthy buildings strategy for new and existing infrastructure; and maximize water conservation to achieve 15 percent reduction per passenger per year (from the 2013 baseline).[47]

Through the SFO Climate Action Plan: Fiscal Year 2019, the Airport Commission has supported the City's climate change initiatives (specifically Ordinance No. 81-08).[48] In fiscal year 2019, the Airport achieved a GHG emission reduction of 41 percent below its 1990 baseline emissions, while achieving an 89 percent increase in passengers over the same time frame, exceeding reductions required under the ordinance.[49]

To meet these goals, SFO has implemented, is currently implementing, or is evaluating future plans to implement a number of GHG emission offset measures and strategies, such as:

- Activation of three all-electric buildings including the Ground Transportation Unit, Administrative facility Building 674, and the Airfield Operations Facility;
- Certification of the all-electric Airfield Operations Facility as the first Zero Net Energy airport building in the world. The building has 72 kilowatts (kW) of solar panels;
- Deployment of sustainable aviation fuel and signing on a voluntary Memorandum of Understanding with ten partner airlines and fuel producers for delivering an infrastructure, logistics, supply chain, and financing study to identify key strategies to increase sustainable aviation fuel volumes at the Airport;
- Aiming to deploy nearly 2,000 electric vehicle chargers before 2023 to electrify roughly 10 percent of the Airport's parking stalls;
- Recommending that all new tenant terminal build-outs be all-electric, phasing out natural gas use;

[47] San Francisco Airport Commission. San Francisco International Airport: Five-Year Strategic Plan 2017–2021, https://www.flysfo.com/sites/default/files/assets/pdfs/reports/Strategic-Plan-2017-2021.pdf, accessed January 25, 2020.

[48] San Francisco Airport Commission, Climate Action Plan: Fiscal Year 2019, https://www.flysfo.com/sites/default/files/media/sfo/community-environment/SFO_Climate_Action_Plan_FY19_Final.pdf, accessed October 14, 2020.

[49] Ibid.

- Implementing a zero-waste strategy, eliminating plastic foodware and single-use plastic water bottles;
- Switching electricity source to Hetch Hetchy Reservoir, a 100 percent decarbonized electricity supply;
- Replacement of all conventional diesel with renewable diesel in backup generators;
- Provision of charging infrastructure for electric GSE used by tenants to service aircraft;
- Installation of preconditioned air supply and 400-Hertz power supply equipment at all terminal gates;
- Providing partial funding for Bay Area Rapid Transit (BART) extension to SFO and payment of BART surcharge for Airport employees to encourage public transit use;
- Construction of the electric AirTrain system, which has eliminated the need for the use of shuttle buses by all on-Airport rental car agencies;
- Implementation of energy efficiency measures at Airport and tenant facilities, including replacement light fixtures in terminals and roadways to light-emitting diode (LED), replacement of all boilers, and upgrade of heating, ventilation, and air conditioning (HVAC) systems to new technologies;
- Implementation of various information technology measures, including automated shutdown of computers after 7 p.m., installation of thin client computers to replace desktop computers, and replacement and consolidation of servers at a "green" data center;
- Activating work to complete its Harvey Milk Terminal 1 photovoltaic system; once fully installed, the Airport will have a 4.23-megawatt (MW) photovoltaic system in place distributed across multiple buildings including the Harvey Milk Terminal 1 (Terminal 1 Center and Boarding Area B), Terminal 3, Long Term Parking Garage 2, Fire House #3, and the Ground Transportation Unit);
- Conversion of all SFO shuttle buses to an all-electric fleet;
- Conversion of all diesel powered vehicles and equipment to renewable diesel;
- Conversion of all light-duty passenger vehicles with zero-emission all-electric or plug-in hybrid vehicles by 2023;
- Meeting LEED Gold certification for renovation of Terminal 2 and anticipating a LEED Gold certification for renovation of Terminal 1 by implementing energy and resource conservation measures and securing LEED Gold certification for all new construction and major renovation projects;
- Replacing refrigerant gases with those with lower Global Warming Potential;
- Participation in The Good Traveler, a program for passengers to voluntarily offset the GHG emissions from travel through purchase of carbon offsets;[50]
- Creation of SFO's Green Business Program, offering no cost support to Airport tenants in areas of energy and water conservation waste reduction; pollution prevention; and cost reduction;
- Certification under Airport Carbon Accreditation as a Level 3 (Optimization) airport which requires assessing the carbon footprint for Scope 1, 2, and 3 emissions, establishment of a GHG reduction goal and demonstrated reductions, and engagement of third parties (Scope 3) to reduce emissions; and
- Enhancement of water conservation practices in new and existing buildings.

[50] The Good Traveler, *https://thegoodtraveler.org/*, accessed March 26, 2021.

While these are goals, the modified project would be required to comply with Chapter 7 of the San Francisco Environment Code and Title 24 of the California Building Standards Code, and to achieve LEED Gold certification.

Based on the Airport's efforts to reduce GHG emissions from Airport activities since 2008, the modified project would result in substantially lower GHG emissions as compared to the administration facilities envisioned in the Master Plan. In addition, consistent with planning department procedures for GHG analysis for municipal projects, a *Compliance Checklist Table for Greenhouse Gas Analysis for Municipal Projects* checklist was completed for the modified project which determined that the modified project would be consistent with San Francisco's GHG reduction strategy.[51] Therefore, the modified project's GHG emissions would not conflict with state, regional, or local GHG reduction plans and regulations. As a result, the modified project would not result in any new significant impacts or substantially increase the severity of a significant impact, and no mitigation measures would be required.

Other Environmental Topics

The topics discussed below are analyzed in less detail than the topics above because the topics above were either not included in the Master Plan FEIR, or the topics below were determined to have less-than-significant impacts (some with mitigation) in the Master Plan FEIR. As described below, the modified project would not result in any new significant impacts or impacts greater than those disclosed in the Master Plan FEIR and no new mitigation measures would be required for these topics.

LAND USE AND PLANNING

The Master Plan FEIR determined that land use and planning impacts associated with implementation of the Master Plan would be less than significant (FEIR pp. 78 to 124 and pp. 250 to 264). The modified project would consolidate some of the Airport's administrative functions in one centralized location, it would not alter the overall array of land uses at the Airport as compared to those analyzed in the Master Plan FEIR, nor would it physically divide an established community. Moreover, to the extent the modified project would conflict with any adopted plans or policies, under the doctrine of intergovernmental immunity in California, when the City, through its Airport Commission, proposes construction on its property located outside of San Francisco and within another jurisdiction, the Airport Commission is not subject to that jurisdiction's building or zoning laws and ordinances. Therefore, the modified project would not result in any new or substantially more-severe impacts than those identified in the Master Plan FEIR. The modified project also would not combine with other projects in the vicinity to result in a significant cumulative impact on land use; therefore, no further analysis is necessary.

AESTHETICS

Aesthetics impacts were determined to be less than significant in the Master Plan Initial Study (FEIR Volume III, p. A.6). The Master Plan Initial Study determined that the Master Plan would not generate adverse aesthetic or visual impacts because the Airport is separated from nearby residential uses by U.S. 101, the West of Bayshore property, and the Caltrans right-of-way. The modified project would be developed in the location of existing buildings and surface parking lots. The project site is adjacent to cargo and administration buildings within the existing Airport, which does not contain any natural

[51] San Francisco Planning Department, *Compliance Checklist Table for Greenhouse Gas Analysis for Municipal Projects*, SFO Consolidated Administration Campus, May 3, 2021.

features that contribute to a scenic public setting. Given that multiple at-grade and elevated freeway and freeway ramp lanes, as well as the elevated AirTrain tracks to the west, are located between the project site and the nearest residential, open space, and commercial neighborhoods, the modified project would not substantially obscure scenic views and vistas, nor would it substantially degrade the visual character or quality of the Airport. New lighting would not be excessive in the context of the existing lighting generated by existing terminal buildings, runways, airplanes, and approach roads, as well as U.S. 101 and other uses in the urbanized area surrounding the Airport. The distance between the modified project site and the closest residential areas (approximately 1,500 feet to the northwest and across U.S. 101) combined with the intervening highway would act to dissipate obtrusive light or glare. Therefore, the modified project would not result in any new or substantially more-severe aesthetics impacts than those identified in the Master Plan FEIR. The modified project also would not combine with other projects in the vicinity to result in a significant cumulative aesthetics impact; therefore, no further analysis is necessary.

POPULATION AND HOUSING

The Master Plan FEIR determined that population and housing impacts associated with implementation of the Master Plan would be less than significant (pp. 228 to 231 and pp. 394 to 399 of the FEIR). The Master Plan FEIR determined that there would be adequate housing in San Francisco and San Mateo counties to accommodate permanent and temporary construction employees. Given that the modified project would accommodate existing employees at the Airport, it would not result in an increase in employment beyond that analyzed in the Master Plan FEIR. In addition, there would be no increase in the number of passengers or aircraft operations at the Airport as a result of the modified project. Therefore, the modified project would not result in any new or substantially greater impacts to population and housing beyond those identified in the Master Plan FEIR. The modified project also would not combine with other projects in the vicinity to result in a significant cumulative impact on population and housing; therefore, no further analysis is necessary.

WIND AND SHADOW

Wind and shadow impacts, which were categorized as “Air Quality/Climate” impacts at the time, were determined to be less than significant in the Master Plan FEIR. Wind and shadow impacts were not analyzed in greater detail in the FEIR because it was determined through the Initial Study analysis that the Master Plan would not have any potential for significant wind or shadow impacts on public areas (FEIR Volume III, pp. A.8 and A.9).

Winds at the Airport blow most frequently from the west and west-northwest. These directions also result in the most frequent strong winds. However, some of the strongest winds blow from the southeast during winter storms, although these winds are substantially less frequent than the prevailing westerly and north-northwesterly winds. Buildings less than 80 feet in height generally do not redirect substantial wind to the ground level. However, the modified project building would be up to 132 feet tall, or 142 feet tall including rooftop projections, which would be tall enough to redirect wind, potentially resulting in wind acceleration in areas of substantial pedestrian use.

Wind speeds at outdoor areas and sidewalks surrounding the modified project are already generally reduced by the existing Airport buildings, as well as by elevated roadway structures, the elevated AirTrain tracks, and the West Field Road AirTrain station. High winds may be noticed on sidewalks and on landscaped areas adjacent to the modified project, but these areas are not used by members of the public. Any change in wind speeds resulting from the modified project would not affect public parks or

other public recreational areas due to the distance between the project site and nearby recreational areas and intervening infrastructure and topography. The landscaped open space in the middle of the CAC, to be constructed under the modified project, would be partially protected from prevailing west and northwest winds by the already constructed Building 674 and by the proposed modified project building and parking garage on the western edge of the site.

The proposed parking garage (Building 675) would be approximately 96 feet tall; however, as is typical of elevated parking structures, the garage would have exterior walls that are not solid surfaces, but rather contain large openings at each level for ventilation and light. As such, the parking garage would only intercept a portion of the prevailing winds and direct them to ground level, as the openings in the building would provide open passageways through the building that wind can travel through so that it is deflected horizontally before reaching pedestrian level.[52] The result would be that the parking garage would cause far less acceleration of pedestrian-level winds than would be the case for a typical office or other occupied building of comparable height. Accordingly, it is not anticipated that the modified project building or parking garage would result in substantial adverse impacts with respect to pedestrian winds.

The modified project would generate new shadows westward in the early morning hours in the spring and summer, and in the northwest direction in the winter. In the afternoon, the modified project would cast new shadow in the northeast direction in winter and spring, and eastward in the summer. In particular, the 132-foot--tall modified project building and the 96-foot-tall parking garage would cast shadow across U.S. 101 and into the West of Bayshore property in the early morning. Shadows would shorten and shift northward as the day progresses. In the afternoon and evening, shadows would lengthen and extend eastward toward the existing Building 660 (U.S. Postal Service). Some of the new shadow generated would be encompassed within the existing shadows cast by the existing AirTrain and U.S. 101 elevated structures, as well as within shadow currently cast by the other buildings on the project site. Shadow would be cast on the landscaped open space in the middle of the site, as well as on roadways and sidewalks in the vicinity of the project site for the majority of the year. However, this additional shadow would not substantially affect the use or function of these areas, as none of these spaces are designated or identified for recreational use or as public open space. The nearest public park is Lions Park, approximately 1,200 feet northwest of the project site and west of U.S. 101. Shadow from the modified project would not reach this park one hour after sunrise to one hour before sunset at any point during the year.[53] Therefore, the modified project would not result in any new or substantially greater wind and shadow impacts beyond those identified in the Master Plan FEIR. The modified project also would not combine with other projects in the vicinity to result in a significant cumulative impact on wind and shadow; therefore, no further analysis is necessary.

UTILITIES AND SERVICE SYSTEMS

The Master Plan FEIR determined that impacts related to utilities and service systems associated with implementation of the Master Plan would be less than significant (refer to the setting on pp. 232 to 236, and impacts on pp. 400 to 404, of the FEIR). The Master Plan FEIR determined that adequate Airport

[52] Global Wind Technology Services (GWTS), *Central City Built Form Review Wind Assessments Report*, prepared for the [Melbourne] Department of Environment, Land, Water and Planning, p. 100, April 21, 2016.

[53] The San Francisco Planning Department typically analyzes shadow impacts between one hour after sunrise and one hour before sunset. At earlier and later times, including the times when shadow from the modified project would reach Lions Park, nearly all of the developed urban area is shaded by the lengthy shadows of existing buildings, and shadows also move quickly across the ground because they are so long. However, because there are no buildings casting existing shadow between Lions Park and the U.S. 101 freeway (i.e., east of the park), this analysis conservatively includes the period before one hour after sunrise.

infrastructure existed to accommodate forecast growth demand for utility demand, including water and wastewater systems (sanitary and industrial), and utility providers would be able to supply the forecast demand. In 2010, SFO consumed 459 million gallons of water (or about 1.25 million gallons per day [mgd]), which is about 43 percent less than projected in the Master Plan FEIR.

The San Francisco Public Utilities Commission's (SFPUC) 2015 Urban Water Management Plan[54] considers SFO a "retail customer" and estimates that current and projected water supplies will be sufficient to meet future retail demand[55] through 2035 under normal year, single dry-year and multiple dry-year conditions; however, if a multiple dry-year event occurs, the SFPUC would implement water use and supply reductions through its drought response plan and a corresponding retail water shortage allocation plan. In December 2018, the State Water Resources Control Board adopted amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary, which establishes water quality objectives to maintain the health of our rivers and the Bay-Delta ecosystem (the Bay-Delta Plan Amendment).[56] The state water board has stated that it intends to implement the Bay-Delta Plan Amendment by the year 2022, assuming all required approvals are obtained by that time. Implementation of the Bay Delta Plan Amendment would result in a substantial reduction in the SFPUC's water supplies from the Tuolumne River watershed during dry years, requiring rationing to a greater degree in San Francisco than previously anticipated to address supply shortages not accounted for in the 2015 Urban Water Management Plan. The modified project does not meet the definition of a "water demand" project, as defined in CEQA Guidelines section 15155. Based on guidance from the California Department of Water Resources and a citywide demand analysis, the SFPUC has established 50,000 gallons per day as an equivalent project demand for projects that do not meet the definitions provided in CEQA Guidelines section 15155(a)(1). The modified project is not anticipated to demand more than 50,000 gallons per day of water; therefore, it does not meet the definition of a water demand project. Therefore, the modified project would not result in any new significant impacts or substantially increase the severity of a significant impact, and no mitigation measures would be required. In addition, the modified project would not make a considerable contribution to a cumulative environmental impact caused by implementation of the Bay-Delta Plan Amendment.

The Mel Leong Treatment Plant (MLTP) has a dry weather capacity of 3.3 mgd for the sanitary plant, and the industrial plant has dry weather capacity of 1.2 mgd and a wet weather capacity of 1.7 mgd. The current average flows for the two sub-plants are approximately 0.8 mgd and 0.65 mgd, respectively; therefore, the MLTP has adequate capacity to serve the modified project, which generally comprises a consolidation and replacement of existing uses and would not substantially increase wastewater generation. The modified project would not substantially change overall Airport drainage patterns. The contractor would be required to comply with federal, state, and local requirements and guidelines to meet water quality objectives for stormwater discharge, including the Construction General Permit, the RWQCB Basin Plan, and the SFO stormwater pollution protection plan. Also, the Airport would comply with the City's Construction and Demolition Ordinance, which sets a goal of diverting 75 percent of construction and demolition debris from landfill for each project. As such, construction debris and

[54] San Francisco Public Utilities Commission, *2015 Urban Water Management Plan*, April 2016, https://www.sfwater.org/Modules/ShowDocument.aspx?documentID=8839, accessed March 26, 2021.

[55] "Retail" demand represents water the SFPUC provides to individual customers within San Francisco. "Wholesale" demand represents water the SFPUC provides to other water agencies supplying other jurisdictions.

[56] State Water Resources Control Board Resolution No.2018-0059, Adoption of Amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento–San Joaquin Delta Estuary and Final Substitute Environmental Document, December 12, 2018, https://www.waterboards.ca.gov/plans_policies/docs/2018wqcp.pdf, accessed March 26, 2021.

operational solid waste demand from the modified project would be adequately served by the Altamont Landfill, and SFO would continue to comply with solid waste statutes and regulations for its ongoing operations. Therefore, the modified project would not result in any new or substantially greater impacts to utilities and service systems beyond those identified in the Master Plan FEIR. In addition, the modified project would not combine with other projects in the vicinity to result in a significant cumulative impact on utilities and service systems; therefore, no further analysis is necessary.

PUBLIC SERVICES AND RECREATION

Public Service (including Recreation) impacts of the Master Plan were analyzed on pp. 237 to 241 and pp. 405 to 406 of the Master Plan FEIR. The Master Plan FEIR determined that impacts related to public services and recreation would be less than significant. The Master Plan FEIR determined that the Airport Bureau of the San Francisco Fire Department (SFFD) and the San Francisco Police Department (SFPD) would need to increase staffing levels to maintain emergency response times due to the increases in passenger forecast and the proposed construction projects under the Master Plan. All new fire and police stations and staffing levels proposed as part of the Master Plan and evaluated in the Master Plan FEIR have been completed and are currently staffed to meet local, state, and federal guidelines with respect to required response times for emergencies. While the Master Plan FEIR concluded that buildout of the Master Plan projects would increase the need for police and fire services because of the forecast increase in passenger activity, SFPD and SFFD stations and staffing has since been increased. Furthermore, the modified project would not include an increase in employees beyond that analyzed in the Master Plan FEIR. Thus the increased demand for fire and police protection resulting from the modified project would not exceed that anticipated in the Master Plan FEIR. Regarding recreation, the modified project would not include dwelling units or residents who would increase the use of neighborhood parks or playgrounds, the nearest of which is Lions Park, approximately 1,200 feet northwest of the project site in the City of San Bruno. Therefore, the modified project would not result in any new or substantially greater impacts to public services (including recreation) beyond those identified in the Master Plan FEIR. The modified project also would not combine with other projects in the vicinity to result in a significant cumulative impact on public services; therefore, no further analysis is necessary.

BIOLOGICAL RESOURCES

The Master Plan FEIR, as part of the Initial Study (FEIR Volume III, pp. A.9 and A.10), determined the Master Plan would not significantly affect biological resources at the nearby West of Bayshore property because this area was excluded from development of Master Plan projects (Master Plan FEIR, Volume III, p. A.9). Construction and operation of the modified project would not interfere with vegetative cover and habitat areas or affect resident or migratory species or rare, threatened, or endangered species because the site is already paved and developed with Airport-related uses. Therefore, the modified project would not result in any new or substantially greater impacts to biological resources beyond those identified in the Master Plan FEIR. The modified project also would not combine with other projects in the vicinity to result in a significant cumulative impact on biological resources; therefore, no further analysis is necessary.

GEOLOGY AND SEISMICITY, HYDROLOGY AND WATER QUALITY, AND HAZARDS AND HAZARDOUS MATERIALS

The three topics of Geology and Seismicity (FEIR pp. 192 to 200 and pp. 374 to 380), Hydrology and Water Quality (FEIR pp. 233 to 235 and p. 403), and Hazards and Hazardous Materials (FEIR pp. 201 to 227 and

pp. 381 to 393) were addressed in the Master Plan FEIR. All impacts were determined to be less than significant, in some cases with implementation of applicable mitigation measures. Given that the modified project would be constructed in the same location as the office/administration facilities analyzed in the Master Plan FEIR, the modified project would not result in new or substantially more-severe impacts than reported in the FEIR with respect to geology and seismicity, hydrology and water quality, and hazards and hazardous materials. Compliance with existing regulations and implementation of the following ASCMs would supersede mitigation measures in the Master Plan FEIR and ensure that no new or substantially more-severe impacts than those reported in the FEIR would occur.

- FEIR Mitigation Measure II.E.1.a, Incorporating Foundation and Geotechnical Recommendations is superseded by California Building Standards Code Section 1803;
- FEIR Mitigation Measure II.E.1.b, Earthquake Safety Inspections is superseded by California Building Standards Code Section 1705;
- FEIR Mitigation Measure II.E.1.c, Emergency Response Plan is superseded by 14 CFR Part 139 Certification of Airports;
- FEIR Mitigation Measure II.F.1.a, Automatic Shutoff Valves is superseded by California Plumbing Code, California Code of Regulations, Title 24, Part 5;
- FEIR Mitigation Measure II.F.1.b, Securing Potentially Hazardous Objects is superseded by American Society of Civil Engineers 7 Standards, Chapter 13, via the California Building Standards Code;
- FEIR Mitigation Measure I.E.1.c, Erosion Control Plans is superseded by ASCM Division 01 General Requirements: (01 57 00) – Temporary Controls;
- FEIR Mitigation Measure I.F.1.a, Site Investigation is superseded by ASCM Division 01 General Requirements: (01 33 16) – Hazard and Hazardous Materials Investigation and Remediation; and, SFO Contract General Conditions – Attachment A, Article 8.I;
- FEIR Mitigation Measure I.F.1.b, Remediation Activities is superseded by Water Quality Control Board Order 99-045;
- FEIR Mitigation Measure I.F.1.c, Safety and Health Plan is superseded by ASCM Division 01 General Requirements: (01 35 13.43) – Regulatory Requirements for Hazardous Waste;
- FEIR Mitigation Measure I.F.1.e, Review of Reports is superseded by ASCM Division 01 General Requirements: (01 33 16) – Regulatory Requirements for Hazardous Waste; (01 35 43.13) – Asbestos Remediation; (01 33 43.14) Lead Remediation; and, (01 35 43.15) – Polychlorinated Biphenyl Remediation;
- FEIR Mitigation Measure I.F.1.f, Remediation Report is superseded by ASCM Division 01 General Requirements: (01 35 43.16) – Excavation and Disposal of Contaminated Soils, Sludge, and Water; (01 33 16) – Regulatory Requirements for Hazardous Waste; and, (01 57 00) Temporary Controls;
- FEIR Mitigation Measure I.F.1.i, Excavation is superseded by ASCM Division 01 General Requirements: (01 35 43.16) – Excavation and Disposal of Contaminated Soils, Sludge, and Water; (01 33 16) – Regulatory Requirements for Hazardous Waste; and, (01 57 00) Temporary Controls;
- FEIR Mitigation Measure I.F.1.j, Procedure for Locating Underground Obstructions is superseded by ASCM Division 01 General Requirements: (01 35 43.02) Underground Petroleum Products Storage Tank Removal; and, California Government Code, Title 1 General, Division 5 – Public Work and Public Purchases, Chapter 3.1 Protection of Underground Infrastructure [4215-4216.24];

- FEIR Mitigation Measure I.F.1.k, Groundwater Testing is superseded by Water Quality Control Board Order 99-045 and ASCM Division 01 General Requirements: (01 57 00) – Temporary Controls;
- FEIR Mitigation Measure I.F.1.g, Asbestos Surveys is superseded by ASCM Division 01 General Requirements: (01 35 43.13) – Asbestos Remediation; and
- FEIR Mitigation Measure I.F.1.h, PCB-Containing Electrical Equipment is superseded by ASCM Division 01 General Requirements: (01 33 16) – Regulatory Requirements for Hazardous Waste and (01 35 43.15) – Polychlorinated Biphenyl Remediation.

In addition, the modified project would not combine with other projects in the vicinity to result in a significant cumulative impact related to geology or seismicity, hydrology and water quality, and hazards and hazardous materials; therefore, no further analysis is necessary.

MINERAL RESOURCES AND ENERGY

Mineral and Energy Resources impacts of the Master Plan projects were analyzed on pp. 178 to 182 and pp. 366 to 370 of the Master Plan FEIR. The Master Plan FEIR determined that impacts related to mineral resources and energy would be less than significant. Construction energy usage is discussed generally on p. 366; energy use from operation of buildings and facilities is analyzed on pp. 367 to 369. Energy plans, policies, and regulations related to the California Building Energy Efficiency standards are described on p. 181 of the Master Plan FEIR. The Master Plan FEIR determined that while demolition of outdated and inefficient buildings/facilities would partially offset the increase in energy use, increased electrical capacity (in the form of a new power substation) would be needed to accommodate the long-term forecasted energy use. Pacific Gas and Electric has since constructed a new substation to provide for increased capacity to transmit electricity from the SFPUC to the Airport. With LEED Gold design and construction standards incorporated into the modified project, construction and operation of the modified project would not encourage activities that would result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner. Lastly, the modified project would be developed on existing Airport property and would have no impact to state, regional, or locally important mineral resources. Therefore, the modified project would not result in any new or substantially greater impacts to mineral and energy resources beyond those identified in the Master Plan FEIR. In addition, the modified project would not combine with other projects in the vicinity to result in a significant cumulative impact on mineral or energy resources; therefore, no further analysis is necessary.

AGRICULTURE AND FORESTRY RESOURCES, AND WILDFIRE

Wildfire and agriculture and forestry resources were not addressed in the Master Plan FEIR. Given the urbanized and built-out nature of the Airport, there are no agricultural or forest resources present, and this topic is not applicable to the modified project. Likewise, wildfire risk, which was not analyzed in the Master Plan FEIR, is not applicable to the modified project.

MANDATORY FINDINGS OF SIGNIFICANCE

This addendum provides a comprehensive discussion of the potential for the modified project to affect the quality of the environment. Specifically, the discussion of biological resources concludes that the modified project would not substantially affect habitats, fish and wildlife populations, and sensitive natural communities; nor would it threaten to eliminate a plant or animal community or reduce the number or restrict the range of a rare or endangered plant or animal. The discussion of cultural resources

describes the potential for the modified project to affect important examples of California history, and identifies two mitigation measures to ensure impacts on cultural resources would be less than significant.

With implementation of identified mitigation, the modified project would not result in cumulatively considerable impacts on land use, aesthetics, population and housing, cultural resources, tribal cultural resources, transportation and circulation, noise, air quality, GHG emissions, wind, shadow, recreation, utilities and service systems, public services, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, energy, agricultural and forest resources, or wildfire.

For the reasons discussed above, the modified project would not cause substantial adverse effects on human beings, either directly or indirectly.

Conclusion

Based on the foregoing, the Department concludes that the analyses conducted and the conclusions reached in the Master Plan FEIR certified on May 28, 1992, remain valid, and that no supplemental environmental review is required for the modified project. The modified project would neither cause new significant impacts not previously identified in the Master Plan FEIR, nor would it result in a substantial increase in the severity of previously identified significant impacts, and no new mitigation measures would be necessary to reduce significant impacts. No changes have occurred with respect to circumstances surrounding the Master Plan that would cause significant environmental impacts to which the modified project would contribute considerably, and no new information has been put forward that shows that the modified project would cause significant environmental impacts. Therefore, no further environmental review is required beyond this addendum.

Devyani Jain

Lisa Gibson
Environmental Review Officer

May 17, 2021

Date of Determination

cc: Project Sponsor
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