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## MEMORANDUM TO FILE

*Date:* October 25, 2024  
*To:* File  
*From:* Jennifer McKellar  
*Re:* Potrero Yard Modernization Project (2500 Mariposa Street)  
(Modification of Potrero Yard Modernization Project – Increase in  
Bus and Bus Operator Count Numbers)  
Case No. 2019-021884ENV

### INTRODUCTION

A final environmental impact report, file number 2019-021884ENV, for the subject project was certified on January 11, 2024. The project analyzed in the final environmental impact report (EIR project) would demolish the existing SFMTA Potrero Trolley Coach Division Facility, located at 2500 Mariposa Street, and replace it with an expanded and modernized transit facility that would also include residential and commercial uses. The project would construct a four level (including mezzanine level), approximately 70-foot-tall replacement transit facility (approximately 700,000 gross square feet accommodating up to 213 buses) plus a mix of commercial (approximately 3,000 gross square feet), childcare (approximately 2,000 gross square feet), and residential uses (approximately 530,000 gross square feet and 513 units). The approximately 1,240,000-gross-square-foot structure would rise to heights ranging from 70 to 150 feet across the site. Six floors of proposed residential development with ground-floor commercial uses would be located in a building constructed adjacent to the transit facility along Bryant Street. The remaining residential development would be atop the replacement transit facility on floors 7 through 13, with a retail use and a joint development residential lobby entrance for pedestrian access integrated with the replacement transit facility. Streetscape changes occurring as part of the project would include pedestrian and bicycle improvements, reconfigured parking and loading areas, installation of new seating areas and street lighting, landscaping, and utility work. The EIR project would be constructed over a period of 46 months.

The EIR also analyzed two additional phased construction scenarios for the EIR project, Scenario 1 and Scenario 2. Both scenarios divide construction into three phases: Phase 1 (new transit facility), Phase 2 (Bryant Street housing) with housing along Bryant Street up to the height of the replacement transit facility, and Phase 3 (family and workforce housing) with housing above the replacement transit facility and Bryant Street Housing. Under Scenario 1, the three construction phases would overlap resulting in periods of concurrent construction activities and operations/residential occupancies. Under Scenario 2, the three construction phases would be sequential with gaps in time (e.g., between Phase 2 and Phase 3) resulting in an overlap of construction activities and operations/residential occupancies, but to a lesser extent than under Scenario 1. Depending on which phased construction scenario is implemented, the construction duration for the EIR project could range between approximately 49 months (similar to the current timeline for the EIR project) and 96 months. This range does not cover options to extend the start date of Phase 3 as allowed under the 30-Year Project Agreement.

As a variant to the project (EIR project variant), the SFMTA would construct the housing along Bryant Street (103 units) but replace the remainder of the podium housing with SFMTA's Paratransit Operations. The proposed paratransit use would include circulation and storage space for 150 cutaway buses and 10 vans as well as space for vehicle service (maintenance bays, chassis wash bay, parts storage) and SFMTA administration.

### **PROPOSED REVISIONS TO PROJECT (MODIFIED PROJECT)**

SFMTA, the project sponsor, now proposes to increase the total number of electric trolley buses accommodated by the replacement transit facility using a different fleet mix of 40-foot and 60-foot buses. The EIR project and EIR project variant analyzed in the EIR proposed 213 electric trolley buses (53 40-foot and 160 60-foot buses). The modified project proposes 246 buses (153 40-foot and 93 60-foot buses), a net increase of 33 buses. To facilitate this change, the modified project would alter the proposed striping on the second level of the replacement transit facility to accommodate the 33 additional buses. Modified striping would include converting 67 of the 60-foot bus parking spaces proposed in the EIR project to 100 40-foot bus parking spaces. Associated with the change in number of buses, the modified project proposes adding 301 additional bus operators to the facility compared to the EIR project. No increase in the number of paratransit bus operators is proposed under EIR project variant conditions. Attachment A provides a detailed project description.

No additional changes to the EIR project or EIR project variant described and analyzed in the EIR are proposed under the modified project.

### **IMPACT ANALYSIS**

As described below, the modified project would not cause new significant impacts or result in a substantial increase in the severity of the impacts identified in the EIR, and no new or revised mitigation measures would be required. (See Public Resources Code section 21166; CEQA Guidelines sections 15162 and 15163.)

For context, following publication of the draft environmental impact report (DEIR), the project analyzed in the DEIR (DEIR project) was refined and a project variant and two phased construction scenarios added. These refinements and additions, collectively described above as the EIR project, EIR project variant and phased construction Scenario 1 and Scenario 2, were analyzed in the DEIR Responses to Comments (RTC) document. Thus, the below analysis includes references to both the DEIR and RTC, which together constitute the final EIR.

Note that the analysis below does not evaluate the modified project's impacts in the context of the EIR project variant being constructed instead of the EIR project. This is because the EIR project variant's impacts would be less severe than the EIR project's impacts. Compared to the EIR project, the EIR project variant would construct a smaller structure (230,000 gross square feet smaller) that would generate fewer operational vehicle trips (1,966 daily vehicle trips instead of 2,288 and 110 p.m. peak hour vehicle trips instead of 155). Therefore, analysis of the modified project compared to the EIR project represents the worst-case scenario.

## Transportation Impacts

### *Construction Impacts*

The modified project does not propose any changes to the project construction details analyzed in the EIR, including those related to phased construction Scenario 1 and Scenario 2. Construction-related transportation impacts would be the same as analyzed in the EIR because the modified project, like the EIR project, would be required to implement public works' Standard Construction Measure #4 (Traffic), Improvement Measure I-TR-A: Construction Management Plan–Additional Measures, and Improvement Measure I-TR-B: Driveway and Loading Operations Plan, which would include measures to accommodate onsite and on-street loading demand for completed phases of the project for the duration of buildout under the phased construction scenarios.

### *Operational Impacts*

Except for the 33 additional electric trolley buses that would be stored/maintained at and enter/leave the project site and the 301 additional bus operators arriving at/leaving the site, the modified project proposes no other design or operational changes compared to the EIR project. The additional 301 bus operators proposed by the modified project would increase daily vehicle trips by 612 employee trips and increase p.m. peak hour vehicle trips by 17 employee trips compared to the EIR project.<sup>1</sup> In total, the modified project would generate 2,900 daily vehicle trips and 173 new p.m. peak hour vehicle trips compared to the 2,288 daily and 155 p.m. peak hour vehicle trips generated by the EIR project. Table 1 provides a summary of these estimates.

Similar to existing conditions, the EIR project and modified project do not generate a substantial number of vehicle trips during the p.m. peak hour. This is because Muni buses generally leave the yard to access their route between 4 a.m. and 7 a.m. and return to the yard in the evening between 7 p.m. and 9 p.m. As such, most employees work non-standard shifts, with the majority of morning employee commute trips occurring before the traditional a.m. peak period, and the majority of evening commute trips occurring after the traditional p.m. peak period. In addition, while the modified project would increase p.m. peak hour vehicle trips to 173 trips compared to the EIR project's 155 trips, these trips would remain less than the screening criteria of 300 peak hour project vehicle trips used by the planning department to determine if transit routes traveling through the project study area are likely to be significantly delayed. Therefore, the modified project would not substantially increase p.m. peak hour vehicle trips, and its transit delay impacts would be similar to those analyzed in the EIR and less than significant.

The modified project's increased number of daily vehicle trips would also not substantially increase vehicle miles travelled or induce automobile travel, and therefore, like the EIR project, related impacts would remain less than significant. In addition, loading impacts, including those occurring under either phased construction scenario, would be similar to those analyzed in the EIR despite the increase in bus operator trips because the modified project would be required to implement public works' Standard Construction Measure #4 (Traffic), Improvement Measure I-TR-A: Construction Management Plan–Additional Measures, and Improvement Measure I-TR-B: Driveway and Loading Operations Plan, which would include measures to accommodate onsite and on-street loading demand for completed phases of the project for the duration of buildout under the phased construction scenarios.

<sup>1</sup> As described in the Draft EIR (p. 3.C33) and the Responses to Comments to the Draft EIR (Appendix C-1, Table 3, p. 11), Muni buses traveling to and from the facility were not included in person trip generation. However, bus driver trips to and from work at the facility were included in the bus maintenance and storage use.

<b>Table 1. Change in Vehicle Trips: Modified Project vs EIR Project<sup>a</sup></b>			
	<b>EIR Project (net new vehicle trips)<sup>b</sup></b>	<b>Modified Project (added vehicle trips)<sup>c,d</sup></b>	<b>Modified Project (total vehicle trips)<sup>e</sup></b>
<b>Change in Daily Trips</b>			
Transit Facility	1,093	612 employee trips	1,705
Residential Development	1,195	0	1,195
<b>Total</b>	<b>2,288</b>	<b>+612</b>	<b>2,900</b>
<b>Change in P.M. Peak Hour Trips</b>			
Transit Facility	+58	17 employee trips	+75
Residential Development	+98	0	+98
<b>Total</b>	<b>+155</b>	<b>+17</b>	<b>+173</b>
Notes: a. Source: Potrero Yard Modernization Project, Responses to Comments on the Draft Environmental Impact Report, Volume 4a: Attachment C-1: Travel Demand Estimates for the Refined Potrero Yard Modernization Project ("RTC Appendix C-1") b. EIR project vehicle trips net of existing transit facility vehicle trips. Source: RTC Appendix C-1, Table 6. Total does not sum precisely due to rounding. c. Vehicle trips (daily) generated by the 301 additional bus operators added by the modified project. Assumptions: Muni bus vehicle trip rate (daily) = 1.9 vehicle trips per bus, bus operator trip rate (daily) = 3.0 person trips per employee; auto mode split for bus operators (weighted by time period) = 83%; Taxi/TNC mode split for bus operators (weighted by time period) = 3%; average vehicle occupancy = 1.23. Vehicle trips include auto and Taxi/TNC trips. Source: RTC Appendix C-1, Table 2, Table 2, Table 4, and Table 2, respectively. d. Vehicle trips (p.m. peak period) generated by the 301 additional bus operators added by the modified project. Assumptions: Muni bus vehicle trip rate (p.m. peak hour) = 0.03 vehicle trips per bus, bus operator trip rate (p.m. peak hour) = 0.07 person trips per employee; auto mode split for bus operators (weighted by time period) = 83%; Taxi/TNC mode split for bus operators (weighted by time period) = 3%; average vehicle occupancy = 1.23. Vehicle trips include auto and Taxi/TNC trips. Source: RTC Appendix C-1, Table 2, Table 2, Table 4, and Table 2, respectively. e. Sum of EIR project (net new vehicle trips) and modified project (added vehicle trips). Total does not sum precisely due to rounding.			

All other operation-related transportation impacts (i.e., potentially hazardous conditions and accessibility) would be the same as those analyzed in the EIR since the modified project would be identical to the EIR project other than the increases in buses and bus operators described above.

Therefore, the modified project would not result in any new significant transportation impacts not already identified in the EIR, nor any substantial increases in the severity of transportation impacts identified in the EIR.

## Noise and Vibration Impacts

### Construction Impacts

The modified project does not propose any changes to the project construction details analyzed in the EIR, including those related to phased construction Scenario 1 and Scenario 2. Therefore, like the EIR project, the modified project's construction-related noise and vibration impacts would be less than significant with the implementation of public works' Standard Construction Measure #5 (Noise), Mitigation Measure M-NO-1: Construction Noise Control, and Mitigation Measure M-NO-2: Vibration-Sensitive Equipment at 2601 Mariposa Street (KQED) Building.

### Operational Impacts

The 33 additional electric trolley buses proposed by the modified project would increase the number of buses moving within and maintained at the site. As with the EIR project, although the bus fleet would be expanded, most bus movement and all maintenance activities would occur within an enclosed space,

which would improve the noise levels at the project site compared to existing conditions (currently, some bus maintenance and all bus storage is outdoors).

The additional 301 bus operators proposed by the modified project would also generate about 17 additional p.m. peak hour vehicle trips traveling to or from the site compared to the EIR project (see Table 1). The EIR assessed traffic volumes along 22 roadway segments in the project vicinity during the p.m. peak hour and determined that the EIR project would increase traffic volumes the most (39 percent) along the roadway segment of Mariposa Street between Hampshire Street and Potrero Avenue (from 274 trips to 380 trips).<sup>2,3</sup> The EIR further determined that this 106-trip increase would increase traffic noise by about 1 dBA along this roadway segment. Because this is below the 3-dBA significance threshold for noise impacts, the EIR project-generated traffic noise increase along local area roadways was found to be less than significant. Similar to the EIR project, the modified project's vehicle trips would be distributed amongst the various roadways in the project vicinity. Therefore, the modified project would add less than 17 new p.m. peak hour vehicle trips along the Mariposa Street roadway segment identified above. Considering that the 106-trip increase analyzed under the EIR would produce about a 1 dBA increase along this road segment, it is unlikely that an additional 17 p.m. peak trips would increase traffic noise along this segment above 3 dBA. Therefore, the modified project's operational offsite traffic noise impact would be similar to the EIR project, although slightly increased, and less than significant (including under either phased construction scenario where onsite receptors are considered).

In addition, operational noise impacts from onsite sources such as HVAC systems, cooling towers, garbage trucks and delivery trucks, would be the same as those analyzed in the EIR because the modified project would be identical to the EIR project except for the additional buses and bus operators, and would be required to implement Mitigation Measure M-NO-3: Fixed Mechanical Equipment Noise Control for Building Operations.

Overall, like the EIR project, the modified project's noise and vibration impacts would be less than significant with the implementation of public works' Standard Construction Measure #5 (Noise), Mitigation Measure M-NO-1: Construction Noise Control, Mitigation Measure M-NO-2: Vibration-Sensitive Equipment at 2601 Mariposa Street (KQED) Building, and Mitigation Measure M-NO-3: Fixed Mechanical Equipment Noise Control for Building Operations. Therefore, the modified project would not result in any new significant air quality impacts not already identified in the EIR, nor any substantial increases in the severity of noise impacts identified in the EIR.

## **Air Quality Impacts**

### *Impacts Related to Construction, Clean Air Plan Consistency and Odors*

The modified project does not propose any changes to the project construction details analyzed in the EIR, therefore construction-related air quality impacts would be the same as analyzed in the EIR, except as described below for the phased construction scenarios. Impacts related to clean air plan consistency and odors would also remain the same as those analyzed in the EIR because the modified project would be identical to the EIR project, except for the change in the number of buses and bus operators, and would be required to implement public works' Standard Construction Measure #2 (Air Quality), Mitigation Measure

<sup>2</sup> Potrero Yard Modernization Project, Draft Environmental Impact Report, pp. 3.D.50-3.D.51.

<sup>3</sup> Potrero Yard Modernization Project, Responses to Comments on the Draft Environmental Impact Report, p. 8.85.

M-AQ-1: Off-Road Construction Equipment Emissions Minimization, and Mitigation Measure M-AQ-3: Emergency Diesel Generator Health Risk Reduction Plan.

*Criteria Air Pollutants*

Operationally, the 33 additional electric trolley buses proposed by the modified project would not increase emissions of air pollutants because they do not use fossil fuels. However, the proposed 301 additional bus operators would generate 612 additional daily vehicle trips to and from the site compared to what was analyzed in the EIR.

Although the EIR project made refinements to the DEIR project, average daily criteria air pollutant emissions were not recalculated for the EIR Project because they were qualitatively determined to be similar to or lower than those analyzed in the DEIR. This is because the EIR project proposes less excavation (and consequently less haul truck trips), a longer construction period, less total square footage (resulting in lower energy and area source emissions and fewer residential and commercial vehicle trips), and the same number of transit facility vehicle trips compared to the DEIR project. Therefore, for this analysis, EIR project emissions are conservatively assumed to be the same as those calculated for the DEIR project, and the modified project's criteria air pollutant emissions are compared to those of the DEIR project.

Compared to the DEIR project, the modified project's 612 additional vehicle trips represent an approximately 29 percent increase in transit facility vehicle trips, which would proportionally increase transit facility criteria air pollutant emissions from mobile sources by approximately 29 percent.<sup>4</sup> Overall, the 612 additional trips represent a smaller increase (16 percent) in total trips (transit facility + residential development) compared to the DEIR project.<sup>5</sup> Table 2 provides a summary of the change in net operational emissions (mobile sources) analyzed in the DEIR and those resulting from the modified project.

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<sup>4</sup> The DEIR analyzed 2,109 daily vehicle trips (total, not net) associated with transit facility operations, which included DEIR project office trips. As noted above, EIR project emissions are conservatively assumed to be the same as those calculated for the DEIR project for this analysis. Therefore, the 612 additional daily bus operator trips proposed by the modified project represents a 29 percent increase in transit facility vehicle trips (an increase from 2,109 to 2,721 trips). Associated emissions are assumed to increase proportionally by 29 percent.

<sup>5</sup> The DEIR analyzed 3,942 daily vehicle trips (total, not net) associated with total DEIR project operations (transit facility and residential/commercial development operations). As noted above, EIR project emissions are conservatively assumed to be the same as those calculated for the DEIR project for this analysis. Therefore, the 612 additional daily bus operator trips proposed by the modified project represent a 16 percent increase in total (operations) vehicle trips (an increase from 3,942 to 4,554 trips).



Table 2. Change in Operation (Net) Criteria Air Pollutant Emissions (Mobile Sources Only) <sup>a</sup>					
Emission Scenario		Average Daily Emissions (lb/day)			
		NO <sub>x</sub>	ROG	PM <sub>10</sub>	PM <sub>2.5</sub>
Existing Emissions (No Project)	Transit Facility	5.8	0.5	5.9	1.0
	<i>Total</i>	5.8	0.5	5.9	1.0
DEIR/EIR Project Emissions <sup>b</sup>	Transit Facility	3.2	0.2	5.9	1.3
	Residential/Commercial Development	4.5	0.2	5.4	1.2
	<i>Total</i>	7.7	0.4	11.3	2.5
Modified Project Emissions	Transit Facility <sup>c</sup>	4.2	0.3	7.6	1.7
	Residential/Commercial Development	4.5	0.2	5.4	1.2
	<i>Total</i>	8.7	0.5	13.0	2.9
Net Project Emissions (EIR Project)		1.9	-0.1	5.4	1.5
Net Project Emissions (Modified Project)		2.9	0.0	7.1	1.9
<b>Change in mobile source emissions</b>		<b>1.0</b>	<b>0.1</b>	<b>1.7</b>	<b>0.4</b>
Notes: a. Adapted from Potrero Yard Modernization Project, Draft Environmental Impact Report (DEIR), Table 3.E.8, p. 3.E.52 and Appendix G-3 b. The EIR project made refinements to the DEIR project; however average daily criteria air pollutant emissions were not recalculated for the EIR Project because they were qualitatively determined to be similar to or lower than those analyzed in the DEIR. In addition, the EIR project proposes the same number of SFMTA employees as the EIR project, so related DEIR and EIR project worker vehicle trip emissions would be the same. Therefore, for this analysis, EIR project emissions are conservatively assumed to be the same as those calculated for the DEIR project, and the modified project's increased criteria air pollutant emissions are compared to those of the DEIR project. c. Modified project transit facility mobile emissions were calculated by increasing DEIR project transit facility mobile emissions by 29 per cent (proportional to the 29 percent increase in vehicle trips with the modified project).					

Table 3 compares the total estimated average daily criteria air pollutant emissions for the EIR and modified projects, including under phased construction Scenario 1. Scenario 1 represents the worst-case scenario because its criteria air pollutant impacts are more severe than Scenario 2's impacts due to more overlap between construction and operation phases.

While the modified project slightly increases net operational criteria air pollutant emissions compared to the EIR project, its emissions do not exceed any of the thresholds of significance.<sup>6</sup> Therefore, the modified project's criteria air pollutant impacts would be similar to those analyzed in the EIR (including under the phased construction scenarios) and remain less than significant with the implementation of public works' Standard Construction Measure #2 (Air Quality) and Mitigation Measure M-AQ-1: Off-Road Construction Equipment Emissions Minimization.

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<sup>6</sup> Emissions, when converted from lb/day to tons/year do not exceed the additional significance threshold of 10 tons/year. Modified project emissions (tons/year) are 2.3 (NO<sub>x</sub>), 4.4 (ROG), 1.4 (PM<sub>10</sub>) and 0.5 (PM<sub>2.5</sub>). Modified project (Scenario 1) emissions (tons/year) are 7.9 (NO<sub>x</sub>), 7.2 (ROG), 1.5 (PM<sub>10</sub>), and 0.5 (PM<sub>2.5</sub>)

Table 3. Criteria Air Pollutant Emissions: EIR and Modified Projects					
Project	Emission Scenario <sup>a</sup>	Average Daily Emissions (lb/day)			
		NOx	ROG	PM <sub>10</sub>	PM <sub>2.5</sub>
DEIR/EIR Project <sup>b</sup>	Mitigated Construction (M-AQ-1)	50	22	0.4	0.3
	Operation (Net)	11.6	24	6.1	2.2
EIR Project (Scenario 1) <sup>c,d</sup>	Mitigated Construction (M-AQ-1) <sup>e</sup>	30.5	15.5	0.2	0.2
	Operation (Net) <sup>f</sup>	11.6	24	6.1	2.2
	<i>Combined Construction and Operation</i>	42.0	39.4	6.3	2.4
Modified Project	Mitigated Construction (M-AQ-1) <sup>g</sup>	50	22	0.4	0.3
	Operation (Net) <sup>h</sup>	12.6	24.1	7.8	2.6
Modified Project (Scenario 1)	Mitigated Construction (M-AQ-1) <sup>i</sup>	30.5	15.5	0.2	0.2
	Operation (Net) <sup>j</sup>	12.6	24.1	7.8	2.6
	<i>Combined Construction and Operation</i>	43.1	39.6	8.0	2.8
Threshold of Significance (lb/day)		54	54	82	54
Exceeds Threshold?		No	No	No	No
Notes:					
a. The DEIR determined that the DEIR project's criteria air pollutant impacts would be less than significant with mitigated construction and unmitigated operations. Consistent with the EIR, all emissions scenarios noted here use this as the basis for comparison.					
b. Construction and operational emissions are taken from Potrero Yard Modernization Project, Draft Environmental Impact Report (DEIR), Table 3.E.7, p. 3.E.47 and Table 3.E.8, p. 3.E.52, respectively. Although the EIR project was refined following publication of the DEIR, the EIR did not recalculate criteria air pollutant emissions. Instead, the EIR (see RTC pp. 8.99-8.103 and p. 8.106) qualitatively determined that the EIR project average daily mitigated construction emissions would be less than the average daily mitigated construction emissions estimated for the DEIR project due to the EIR project's fewer construction haul truck trips (18 percent reduction in emissions from on-road trucks) and extended construction duration (23 percent reduction in average daily emissions by 23 percent). Therefore, criteria air pollutant emissions reported for the EIR project are those estimated for the DEIR project.					
c. The EIR determined that phased construction Scenario 1 impacts were more severe than Scenario 2 impacts due to more overlap between construction and operation phases, therefore only Scenario 1 impacts are shown here.					
d. Construction and operation emissions are taken from Potrero Yard Modernization Project, Responses to Comments on the Draft Environmental Impact Report (RTC): Volume 3: Table 8.7, p. 8.111.					
e. The EIR estimated EIR project average daily mitigated construction emissions under phased construction Scenario 1 based on the DEIR project's average daily mitigated construction emissions, taking into account the reduction from fewer construction haul truck trips (18 percent reduction in emissions from on-road trucks) and extended construction duration (28 percent reduction in average daily emissions).					
f. To be conservative, the EIR evaluated criteria air pollutant emissions during the overlapping periods under Scenario 1 based on average daily emissions from full construction of all three phases and full operation of all three phases simultaneously. In addition, the net operational emissions estimated for the DEIR Project, as reported on DEIR p. 3.E.52, are used in this analysis as operational emissions for the EIR project under scenario 1, which is conservative.					
g. The modified project proposes no construction changes; therefore, its construction impacts are equal to those analyzed for the EIR project.					
h. Modified project net operation emissions = EIR Project net operation emissions plus change in net operation emissions from Table 2 of this document.					
i. The modified project proposes no construction changes; therefore, its construction impacts are equal to those analyzed for the EIR Project under Scenario 1.					
j. Modified project net operation emissions = EIR project net operational emissions plus change in net operational emissions from Table 2 of this document.					

### Cancer Risk and PM<sub>2.5</sub> Exposure

Although the EIR project made refinements to the DEIR project, excess cancer risk and PM<sub>2.5</sub> concentrations at the maximally exposed individual resident (MEIR) were not recalculated for the EIR Project because they were qualitatively determined to be less severe than those analyzed in the DEIR.<sup>7</sup> This

<sup>7</sup> The EIR did however update the DEIR health risk analysis to include: 1) the contribution of construction fugitive dust to fine particulate matter (PM<sub>2.5</sub>) concentrations at nearby receptors (residential and worker); and 2) the evaluation of excess lifetime cancer risk and chronic hazard indices (HIs) for offsite worker receptors. See Potrero Yard Modernization Project, Responses to Comments on the Draft Environmental Impact Report (RTC): Volume 4a, Attachment E-1.



is because the EIR project proposes less excavation (and consequently less haul truck trips), a longer construction period, fewer residential and commercial vehicle trips, and the same number of transit facility vehicle trips compared to the DEIR project. Therefore, for this analysis, EIR project health risks are conservatively assumed to be the same as those calculated for the DEIR project, and the modified project's health risks are compared to those of the DEIR project.

Conservatively, the 612 additional bus operator vehicle trips would increase excess cancer risk by about 0.284 per million and PM<sub>2.5</sub> concentration by about 0.016 µg/m<sup>3</sup> at the MEIR.<sup>8</sup> Table 4 compares the excess cancer risk and PM<sub>2.5</sub> concentration contributions of the DEIR/EIR project and modified project at the MEIR.

<b>Table 4. Excess Cancer Risk and PM2.5 Concentration at Maximally Exposed Individual Resident for EIR and Modified Projects</b>			
<b>Project</b>	<b>Emission Scenario: Mitigated Emissions (M-AQ-1 and M-AQ-3)</b>	<b>Health Risks at MEIR</b>	
		<b>Excess Cancer Risk (per million)</b>	<b>PM2.5 (µg/m<sup>3</sup>)</b>
DEIR/EIR Project <sup>a</sup>	Off-Road Construction Equipment	6.22	0.08
	On-Road Construction Vehicles	0.10	0.002
	On-Road Operational Vehicles	0.18	0.008
	Emergency Generators	0.37	0.001
	<i>EIR Project Health Risks Contribution</i>	6.87	0.085 (construction phase) 0.009 (operation phase)
Modified Project	Off-Road Construction Equipment	6.22	0.08
	On-Road Construction Vehicles	0.10	0.002
	On-Road Operational Vehicles <sup>b</sup>	0.464	0.025
	Emergency Generators	0.37	0.001
	<i>Modified Project Health Risks Contribution</i>	7.154	0.085 (construction phase) 0.025 (operation phase)
<i>Threshold of Significance</i>		7.0	0.2
<i>Exceeds Threshold?</i>		Yes <sup>c</sup>	No
Notes:			
a. Emissions and health risks are taken from Potrero Yard Modernization Project, Responses to Comments on the Draft Environmental Impact Report (RTC): Volume 3: (Revised) Table 3.E.9, p. 11.30. Although the EIR project was refined following publication of the DEIR, the EIR did not recalculate health risks for the EIR project. Instead, the EIR qualitatively determined that EIR project health risk impacts would be less severe than those of the DEIR project but would conservatively remain significant and unavoidable with the implementation of Mitigation Measure M-AQ-1 and Mitigation Measure M-AQ-3 (see RTC pp. 8.103-8.106). Therefore, emissions and health risks reported for the EIR project in Table 4 are those estimated for the DEIR project.			
b. Compared to the EIR project, the Modified project would increase excess cancer risk by about 0.284 per million and PM <sub>2.5</sub> concentration by about 0.016 µg/m <sup>3</sup> at the maximally exposed individual resident (MEIR). Note that these are conservative estimates based on a screening tool described in the planning department's <a href="#">Air Quality and Greenhouse Gas Guidelines, July 2024</a> , Appendix C: Technical Support Documentation of a Health Risk Screening Method for On-Road Vehicular Emissions in City and County of San Francisco, accessed September 30, 2024.			
c. Despite this exceedance, the modified project would not result in a new impact because the EIR determined that the EIR project's health risk impacts would be significant and unavoidable with the implementation of Mitigation Measure M-AQ-1 and Mitigation Measure M-AQ-3.			

The modified project's contribution to health risks at the MEIR would not exceed the significance threshold for PM<sub>2.5</sub> concentration but would slightly exceed the significance threshold for excess cancer risk. However,

<sup>8</sup> Equations for estimating the additional excess cancer risk and PM<sub>2.5</sub> concentration at the maximally exposed individual resident (MEISR) resulting from the modified project's increased bus operator vehicle trips are based on a conservative screening tool found in the planning department's [Air Quality and Greenhouse Gas Guidelines, July 2024](#), Appendix C: Technical Support Documentation of a Health Risk Screening Method for On-Road Vehicular Emissions in City and County of San Francisco, accessed September 30, 2024.

the modified project's health risk impacts would remain similar to the EIR project's health risk impacts, which the EIR conservatively determined to be significant and unavoidable with the implementation of Mitigation Measure M-AQ-1 and Mitigation Measure M-AQ-3.

The EIR determined that the EIR project under either phased construction Scenario 1 or Scenario 2 would result in health risk impacts that are similar to or less severe than those of the EIR project. Therefore, if the modified project was constructed under either Scenario 1 or Scenario 2, its contribution to health risks would be similar to or less severe than those described above, and would remain significant and unavoidable with the implementation of public works' Standard Construction Measure #2 (Air Quality), Mitigation Measure M-AQ-1: Off-Road Construction Equipment Emissions Minimization, and Mitigation Measure M-AQ-3: Emergency Diesel Generator Health Risk Reduction Plan.

Therefore, overall, the modified project would not result in any new significant air quality impacts not already identified in the EIR, nor any substantial increases in the severity of air quality impacts identified in the EIR.

### **Remaining Environmental Topics**

The modified project would have the same environmental impacts as the EIR project related to land use and planning; population and housing; cultural resources, tribal cultural resources, greenhouse gas emissions, wind, shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, hazards and hazardous materials, mineral resources, energy resources, agriculture and forestry resources, and wildfire. This is because the modified project's increased number of buses and bus operators, and associated increased number of vehicle trips, would not change the analyses conducted for these environmental topics in the EIR.

### **CONCLUSION**

San Francisco Administrative Code Section 31.19(c)(1) states that a revised project must be reevaluated and that, "If, on the basis of such reevaluation, the Environmental Review Officer determines, based on the requirements of CEQA, that no additional environmental review is necessary, this determination and the reasons therefore shall be noted in writing in the case record, and no further evaluation shall be required by this Chapter." Thus, for the reasons outlined above, this note to file provides sufficient documentation that the revised project does not warrant additional environmental review.

### **ATTACHMENT A**

Project Description Memo: Modification of Potrero Yard Modernization Project – Increase in Bus and Bus Operator Count Numbers

CC: Wade Wietgreffe, San Francisco Municipal Transportation Agency  
Liz Nagle, San Francisco Municipal Transportation Agency  
Gabriela Pantoja, San Francisco Planning Department



Date: October 25, 2024  
To: Jennifer McKellar San Francisco Planning Department  
From: Wade Wietgreffe, San Francisco Municipal Transportation Agency  
Through: Liz Nagle, San Francisco Municipal Transportation Agency  
Re: **Potrero Yard Modernization Project** (Modification of Potrero Yard Modernization Project – Increase in Bus and Bus Operator Count Numbers)  
Case Number: 2019-021884ENV

## SUMMARY

The San Francisco Municipal Transportation Agency (SFMTA) proposes a minor modification to the Potrero Yard Modernization Project, which received California Environmental Quality Act (CEQA) clearance on January 11, 2024 (Planning case no. 2019-021884ENV). As with the original project, the project, herein referred to as the modified project, would demolish the existing SFMTA Potrero Trolley Coach Division Facility and replace it with an expanded and modernized transit facility that would also include residential and commercial uses. Similar to the original project, the modified project would contain a four level (including mezzanine level), approximately 70-foot-tall replacement transit facility (approximately 700,000 gross square feet) plus a mix of commercial (approximately 3,000 gross square feet), childcare (approximately 2,000 gross square feet), and residential uses (approximately 530,000 gross square feet and 513 units).<sup>1</sup> The approximately 1,240,000-gross-square-foot structure would rise to heights ranging from 70 to 150 feet across the site. Six floors of proposed residential development with ground-floor commercial would be located in a building constructed adjacent to the transit facility along Bryant Street. The remaining residential development would be atop the replacement transit facility on floors 7 through 13, with a retail use and a joint development residential lobby entrance for pedestrian access integrated with the replacement transit facility. Streetscape changes occurring as part of the modified project would include the same pedestrian and bicycle improvements, parking and loading reconfigurations, and installations of seating areas and street lighting, landscaping, and utility work as the original project. The modified project would not make any changes to the project construction details described in the EIR, including those described for the two phased construction options identified as Scenario 1 and Scenario 2.

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<sup>1</sup> The numbers herein generally reflect the maximum amount of anticipated development. Actual amounts may be less.

As a variant to the project, the SFMTA would construct the housing along Bryant Street (103 units) but replace the remainder of the podium housing with SFMTA's Paratransit Operations. The proposed paratransit use would include circulation and storage space for 150 cutaway buses and 10 vans as well as space for vehicle service (maintenance bays, chassis wash bay, parts storage) and SFMTA administration.

The modified project is limited to an increase in the total number of proposed electric trolley buses (including a different fleet mix of the 40-foot and 60-foot buses) and an associated increase in the proposed number of bus operators. This change to the transit facility component of the project is also applicable to the project variant. Under the EIR, the original project proposed accommodation of 213 buses and 829 SFMTA employees. Under the modified project, 246 buses (an increase of 33 buses) and 1,130 employees (an increase of 301 bus operators) are proposed. Differences in the composition of the bus fleet mix under the modified project include 100 additional 40-foot buses and 67 less 60-foot buses. The change in total bus length from the modified project versus the EIR project is an overall decrease of 20 feet due to the utilization of more 40-foot buses and less 60-foot buses under the modified project. See Table 1 for details.

Category <sup>a</sup>	Existing	EIR Project	Modified Project	Δ EIR Project & Modified
<i>Total # of Buses</i>	<i>158</i>	<i>213</i>	<i>246</i>	<i>+33</i>
40' Buses	65	53	153	+100
60' Buses	93	160	93	-67
<i>Total Length of Buses</i>	<i>8,180'</i>	<i>11,720'</i>	<i>11,700'</i>	<i>-20'</i>
a. All buses under existing, EIR, and modified project conditions are electric-trolley, and most buses would enter and exit the new facility outside of AM and PM peak hours.				

Table 1: Total Number of Buses – Existing, EIR and Modified Project Conditions

## EXISTING CONDITIONS

The project is located on the 4.4-acre site owned by the SFMTA. It is bounded by Mariposa Street to the south, Bryant Street to the west, 17th Street to the north, and Hampshire Street to the east in the Mission neighborhood of the City and County of San Francisco. The project site is across the street from a public park, Franklin Square. The location of the project site/existing facility is shown in **Figure 1 in Attachment A**.

The western half of the existing Potrero Yard facility is occupied by the asphalt-paved bus storage yard. The eastern half of the site is occupied by the predominantly single-story maintenance and operations building, with a second story located along Mariposa and Hampshire Streets.

## MODIFIED PROJECT

The modified project would alter the proposed striping on the second level of the replacement transit facility to accommodate the 33 additional buses. Modified striping would include converting 67 60-foot bus parking spaces in the EIR project to 100 40-foot bus parking spaces in the modified project. **See Figure 2a and Figure 2b in Attachment A.** It is anticipated that the increase in 33 buses under the modified project would also include an increase in SFMTA employees to operate the buses. It is estimated that the modified project would require 301 additional operators compared to the EIR project.<sup>2</sup> See Table 2 for details.

Category	Existing	EIR Project	Modified Project <sup>a</sup>	Δ EIR Project & Modified Project
<i>Preferred Project: Total SFMTA Employees</i>	400	829	1,130	+301
Operators	295	383	684	+301
Other	105	446	446	0
a. Operator estimates for the Modified Project were developed using the following assumptions: 20% vehicle spare ratio, 2.57 operator shifts per in-service vehicles, and 30% operator extraboard. Prior Operators estimates were too low as they would have conflicted with the Federal Transit Administration's vehicle spare ratio policy of 20% or required the SFMTA to miss bus service to meet the policy even if every operator showed up to work every day. Vehicle spare ratio is the total number of spare vehicles available for fixed-route service divided by the total number of fixed-route vehicles required for annual maximum service. For example, if SFMTA has 100 vehicles in fixed-route service, SFMTA would need 20 additional spare vehicles, for a total of 120 vehicles (20/100 = 20%). Extraboard refers to backup operators to account for unexpected operator absences.				

Table 2: Total Number of SFMTA Employees – Existing, EIR and Modified Project Conditions

No additional changes to the project described and analyzed in the EIR are proposed as a result of the modified project.

## CONCLUSION

Planning department staff reviewed the modified project and determined that due to the minor increase of buses proposed, it fits within the scope analyzed for the original project and the potential environmental impacts are very similar to those identified in the EIR. This determination, documented in a memorandum to file, October 25, 2024, is available in case no. 2019-021884ENV.

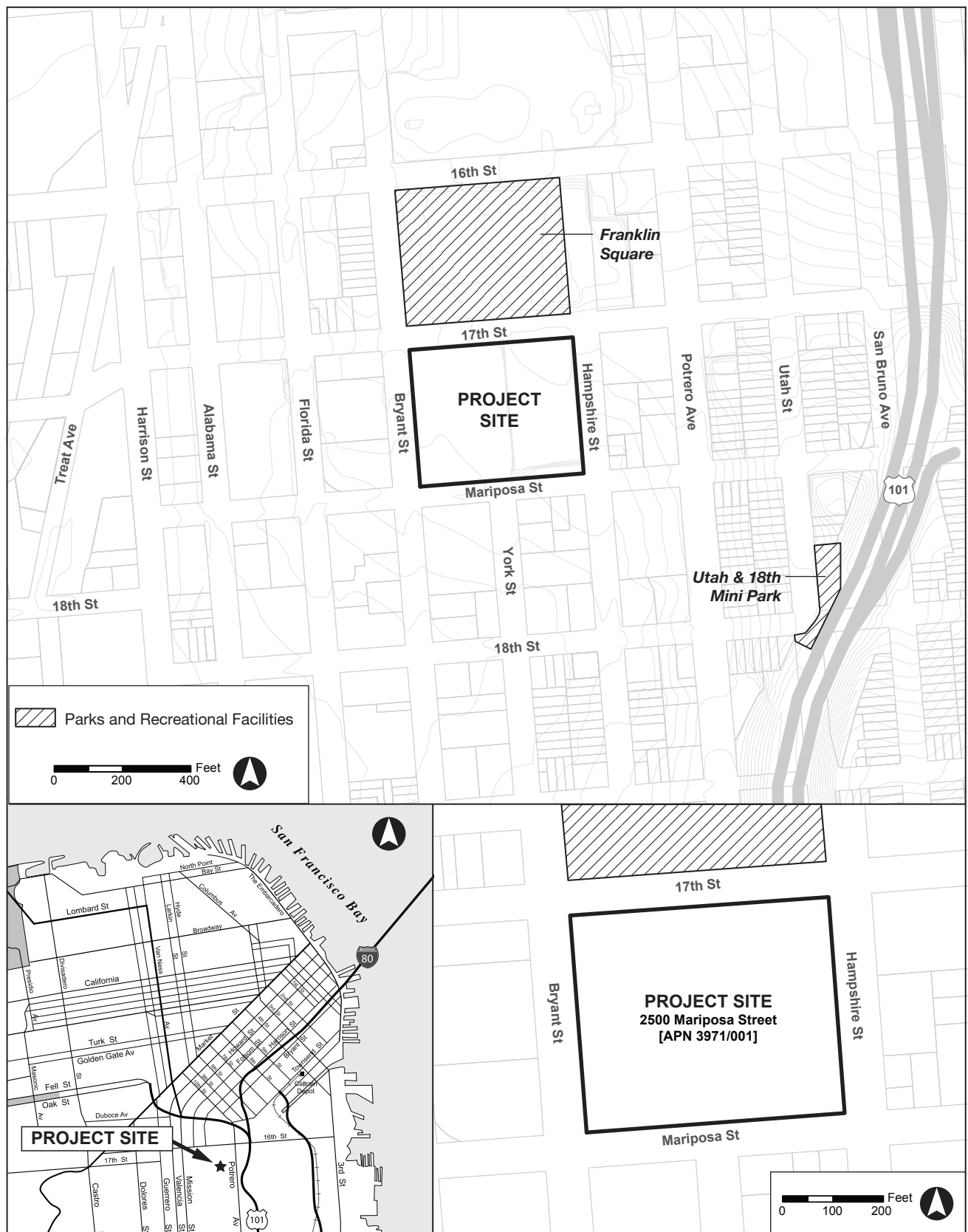
## ATTACHMENT A

Figure 1: Project Location

Figure 2a: EIR Project – Transit Level 2

Figure 2b: Modified Project – Transit Level 2

<sup>2</sup> The modified project would increase the number of buses and employees for the replacement transit facility but would not increase the number of buses or employees for paratransit operations. San Francisco, CA 94103 SFMTA.com



Source: SWCA, 2020

# POTRERO YARD MODERNIZATION PROJECT

**FIGURE 1: PROJECT LOCATION**



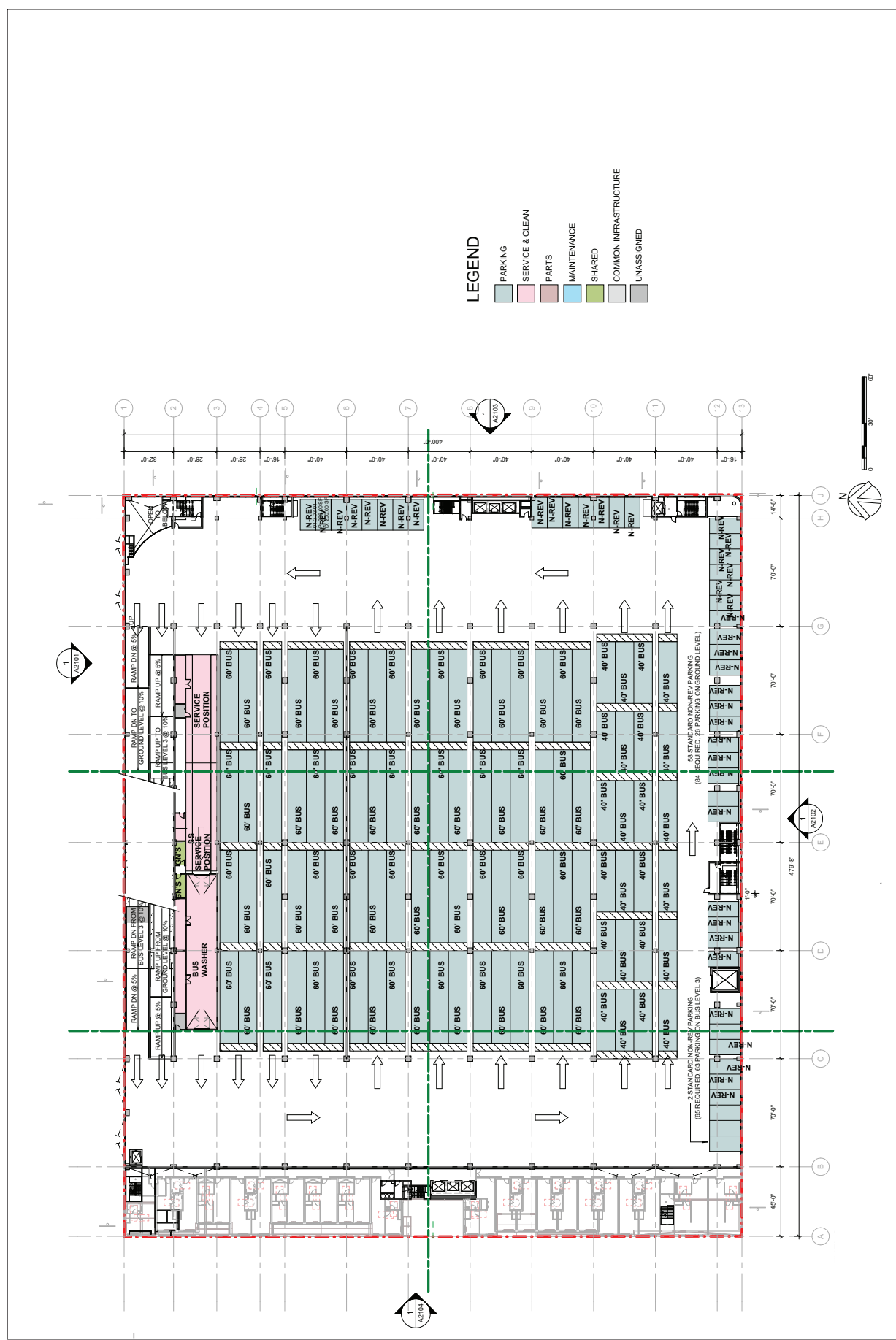
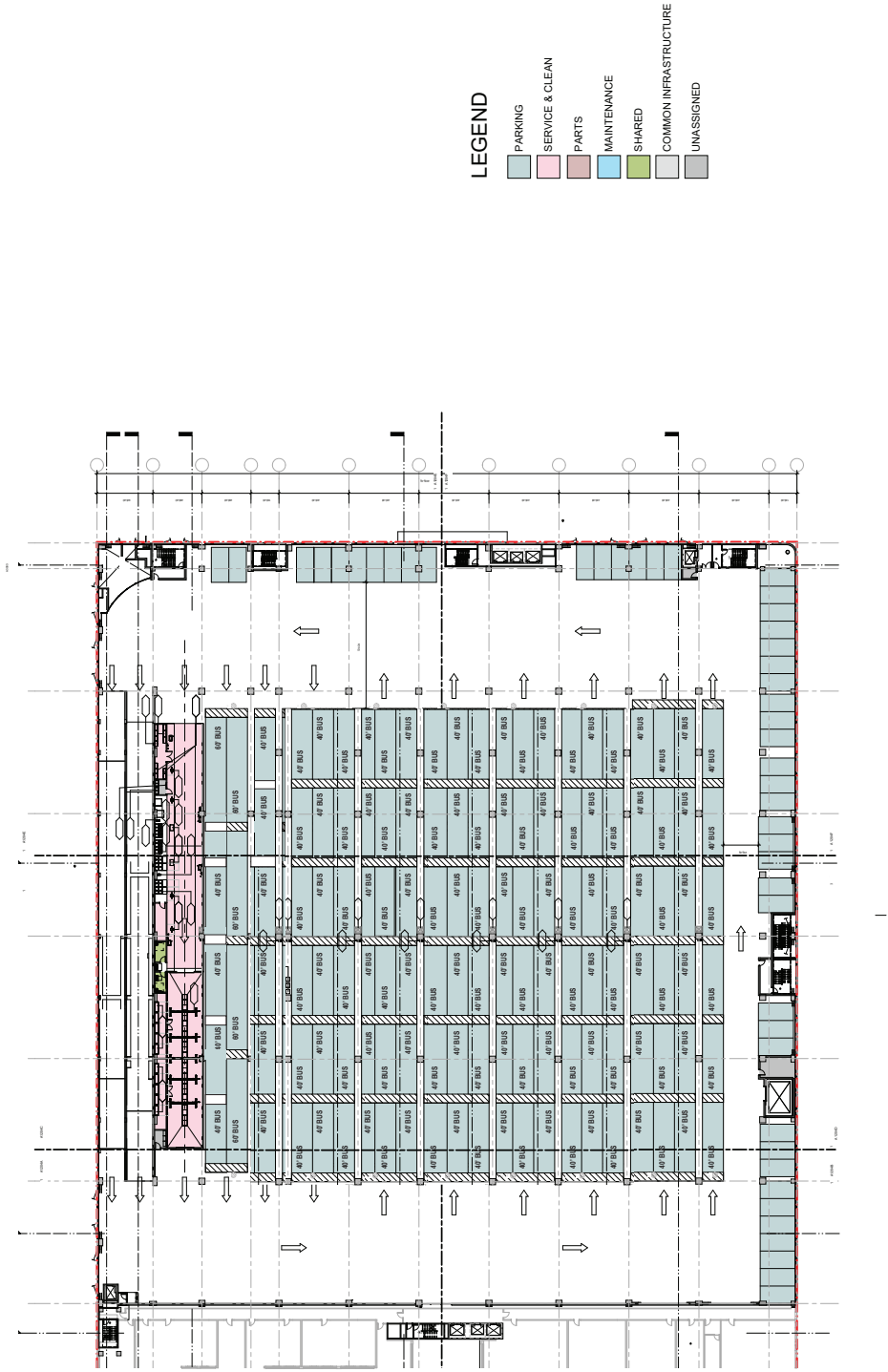


Figure 2a: EIR Project - Transit Level 2



Source: SFMTA and Laura Blake, 2024

POTRERO YARD MODERNIZATION PROJECT

Figure 2b: Modified Project - Transit Level 2