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ADDENDUM 8 TO ENVIRONMENTAL IMPACT REPORT

Date of Addendum:	December 15, 2022
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:	**Plot 10F Demolition and Paving and Cargo Building 662**
Project Case No.:	2022-003521ENV
Project Site:	West Field Area of the Airport, bound by West Field Road to the south, East Campus Drive and Building 674 (Consolidated Administrative Campus) to the west, airfield to the north, and airline support facilities to the east
Project Sponsor:	San Francisco International Airport, David Kim, 650.821.1426, david.t.kim@flysfo.com
Lead Agency:	San Francisco Planning Department
Staff Contact:	Michael Li, 628.652.7538, michael.j.li@sfgov.org

Overview

The project sponsor, the San Francisco International Airport (SFO or Airport), has submitted to the San Francisco Planning Department Environmental Planning Division (EP) a project description and related materials for proposed revisions to its U.S. Air Mail Facility Expansion project in the West Field area 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.

Subsequent to adoption of the Master Plan, Airport cargo facilities as envisioned in the Master Plan were modified. These modifications were evaluated in addenda to the FEIR published in 2003 (2003 Addendum) and in 2021 for the West Field Cargo Redevelopment project (2021 Addendum). These modifications and addenda are described below.

Since adoption of the Master Plan, certification of the Master Plan FEIR, and publication of the 2003 and 2021 addenda, additional modifications to Airport cargo facilities have been proposed to include demolition of Building 660 (Airport Post Office) and construction of interim and permanent *remain*

[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 (2022-003521ENV). Project application materials can be viewed by clicking on the "Related Documents" link.

overnight (RON) aircraft parking positions[2] and construction of Building 662, which would accommodate cargo/warehouse uses. The proposed modifications also would include construction of an elevated walkway from Building 662 to adjacent Airport buildings. These proposed modifications and other related improvements described below comprise the Plot 10F Demolition and Paving and Cargo Building 662 project, hereafter referred to as 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 San Francisco Planning Department (planning department) has determined that the modified project is within the scope of the FEIR prepared for the Master Plan and certified by the planning commission, and no additional environmental review beyond the analysis herein is required.

Background

Master Plan FEIR

An 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).[3] 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. 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 the 2030s; and

[2] *Remain overnight (RON)* aircraft parking areas are remote aprons used to stage or store aircraft on a temporary basis. They provide additional positions and make gates available for passenger operations. These are commonly used for overnight aircraft parking.
[3] 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).

8. New administration/office facilities completed in 2000 and 2018, with final build out anticipated to begin in 2024.

CARGO FACILITIES ANALYZED IN THE MASTER PLAN FEIR

As described in the Master Plan FEIR (p. 52), the Master Plan proposed development of cargo facilities in two phases:

- Phase 1 near-term buildout (1996) included demolition of three cargo facilities totaling 241,300 square feet, construction of 792,300 square feet of new cargo space (for a net total of 551,000 square feet), and remodel of 71,400 square feet of existing cargo space; and
- Phase 2 long-term buildout (2006) included demolition of a 60,000-square-foot facility, construction of three new cargo buildings totaling 162,000 square feet, and an approximately 132,000-square-foot addition to the U.S. Air Mail Facility, for a net total of 234,000 square feet of new construction.

Since adoption of the Master Plan, a 78,400-square-foot cargo facility (Building 648) was completed in 2001 and a 112,520-square-foot cargo facility (Building 632) was completed in 2014.

Subsequent Addenda

Several addenda have been prepared to analyze changes to various projects considered in the Master Plan FEIR. Only two addenda, as described below, pertain to air freight/cargo facilities.

2003 ADDENDUM

In 2003, an addendum was published that addressed revisions to the approved Master Plan air freight/cargo and administrative/office facilities. The addendum analyzed the Airport's proposal to decrease the size of the administration/office facilities in the West Field. The addendum also analyzed the Airport's proposal to reduce the size of cargo facilities elsewhere at the Airport compared to what was studied in the Master Plan FEIR. Regarding cargo facilities, the 2003 Addendum analyzed construction of 472,200 square feet of new cargo facilities compared to 486,000 square feet of cargo facilities analyzed in the Master Plan FEIR. Regarding the administrative/office facilities, the 2003 Addendum analyzed construction of 220,000 square feet of new administrative/office facilities as compared to 226,100 square feet of administrative/office facilities analyzed in the Master Plan FEIR. Because the cargo and administrative/office facilities (in combination) analyzed in the 2003 Addendum were within the parameters of the cargo facilities studied in the Master Plan FEIR, the 2003 Addendum concluded that the revisions to the Master Plan would not cause new significant impacts not identified in the Master Plan FEIR, and no new mitigation measures would be necessary.

ADDENDUM 7 (2021)

In 2021, an addendum was published that addressed further revisions to the approved Master Plan air freight/cargo facilities. This addendum analyzed the Airport's proposed demolition of seven buildings, construction of three new buildings, and reconfiguration of over 1 million square feet of apron areas to accommodate current and future air cargo operations and RON aircraft parking positions. These modifications comprised the West Field Cargo Redevelopment project. Because the cargo facilities analyzed in the 2021 Addendum were within the parameters of the cargo facilities studied in the Master Plan FEIR, the 2021 Addendum concluded that the revisions to the Master Plan would not cause new

significant impacts not identified in the Master Plan FEIR, and no new mitigation measures would be necessary.

Modified Project Description

The modified project would demolish Building 660 (Airport Post Office) and adjacent paved areas and redevelop the site with interim and permanent RON positions, a new Building 662, and an elevated walkway connecting Building 662 to adjacent Airport buildings. A segment of the existing vehicle service road (VSR) would be shifted north to increase apron depth while continuing to conform to Federal Aviation Administration (FAA) *object free area*[4] standards for the adjacent Taxilane Z2. **Figure 1** shows the modified project site, which is entirely on Airport property and includes Building 660, a portion of the adjacent Air Operations Area (AOA), and areas along West Field Road and West Cargo Road. Following demolition of Building 660, the Airport would temporarily use the site for RON positions, prior to construction of Building 662.

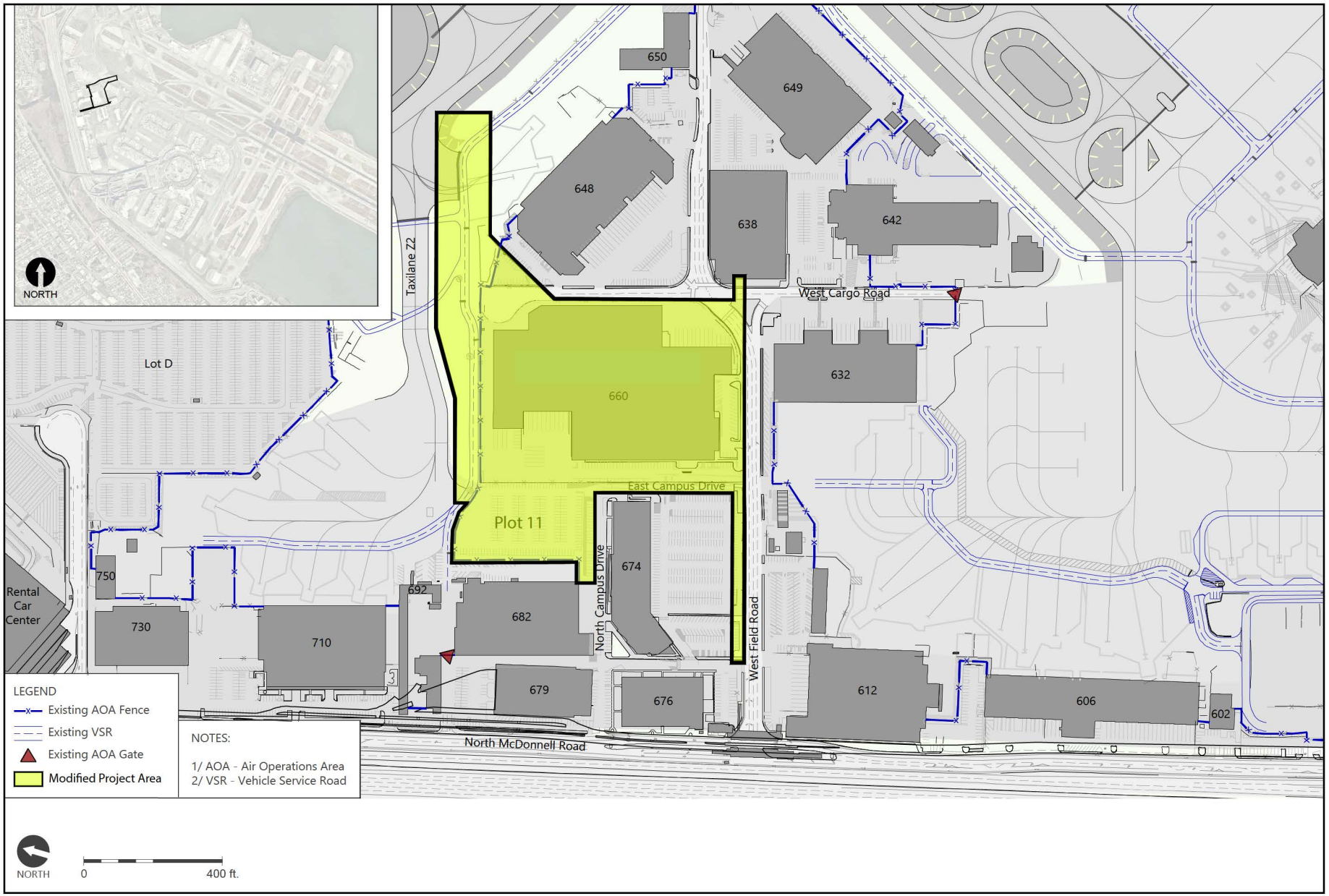
The proposed Building 662 would comprise a two-level, approximately 72-foot-tall (approximately 85 feet to top of the mechanical equipment) warehouse building with vehicle access from West Field Road and East Campus Drive. Associated vehicle parking and truck docks would be located south of the building along West Field Road, and a truck loading and docking area would be located on the north side of the building (see **Figure 2**, p. 6). The existing VSR would be shifted north towards Taxilane Z2, and a vehicle turnaround segment of West Cargo Road east of the proposed permanent RON aircraft positions would be realigned to accommodate construction of the RON positions. An elevated walkway would be constructed connecting Building 662 to Building 638 (West Field Employee Parking Garage) and the West Field AirTrain[5] station platform to the east and the future Building 670 to the west, which will be dedicated to office use for existing tenant and City/Airport Commission employees from other administration facilities at the Airport.

MODIFIED PROJECT COMPONENTS

As shown in **Table 1**, the modified project would include the following components:

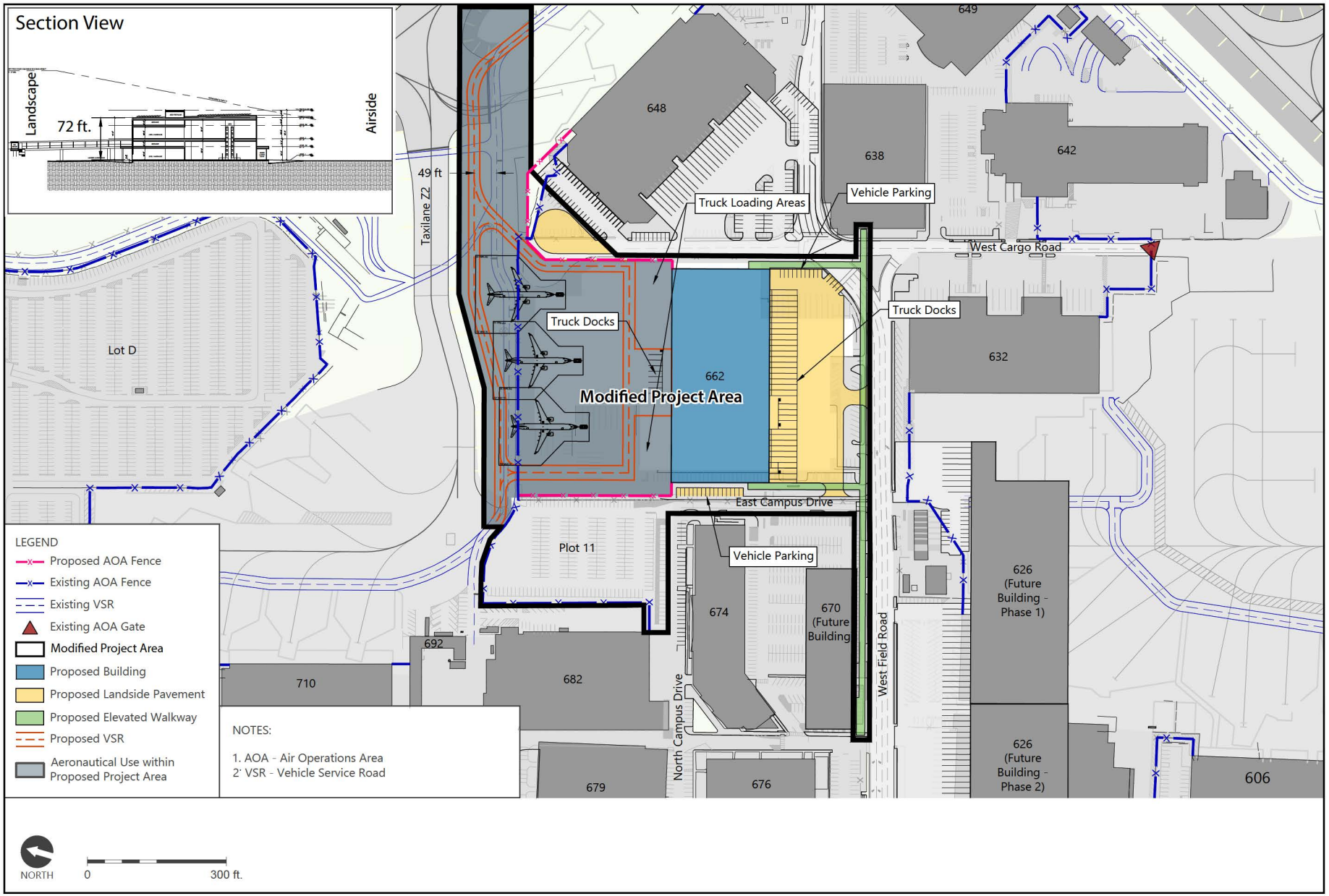
- Demolish Building 660, a 240,000-square-foot former U.S. Postal Service Facility that is currently vacant, and 206,000 square feet of existing paved area adjacent to the building.
- Construct approximately 430,000 square feet of interim RON aircraft parking positions on existing apron area. This area, between Taxilane Z2 and West Field Road, would temporarily accommodate 10 Airplane Design Group[6] (ADG) III RON aircraft parking positions on an interim basis prior to construction of Building 662 (see **Figure 3**, p. 8).[7] This interim use would last from 2025 to 2027.

[4] An *object free area* is an area centered on the runway, taxiway, or taxilane centerline that is clear of aboveground objects, except for allowable objects necessary for air navigation or aircraft ground maneuvering purposes.
[5] AirTrain is an automated people mover system at SFO.
[6] Airplane Design Group (ADG) is a grouping of airplanes based on wingspan or tail height. Typical ADG III aircraft include the Boeing 737-700 and the Airbus A-320.
[7] The modified project would not induce aircraft operations, and both the interim and permanent RON aircraft parking would occur in generally the same area as under existing conditions.



San Francisco International Airport, Airport Layout Plan, 2021 (linework);
Nearmap, California, October 14, 2020 (aerial photography - see upper left inset);
Ricondo & Associates, Inc., March 2022 (exhibit); adapted by ESA in 2022

FIGURE 1
MODIFIED PROJECT LOCATION



SOURCES: San Francisco International Airport, Airport Layout Plan, 2021 (linework);
Landrum & Brown, December 2021 (proposed project);
Ricondo & Associates, Inc., March 2022 (exhibit); adapted by ESA in 2022

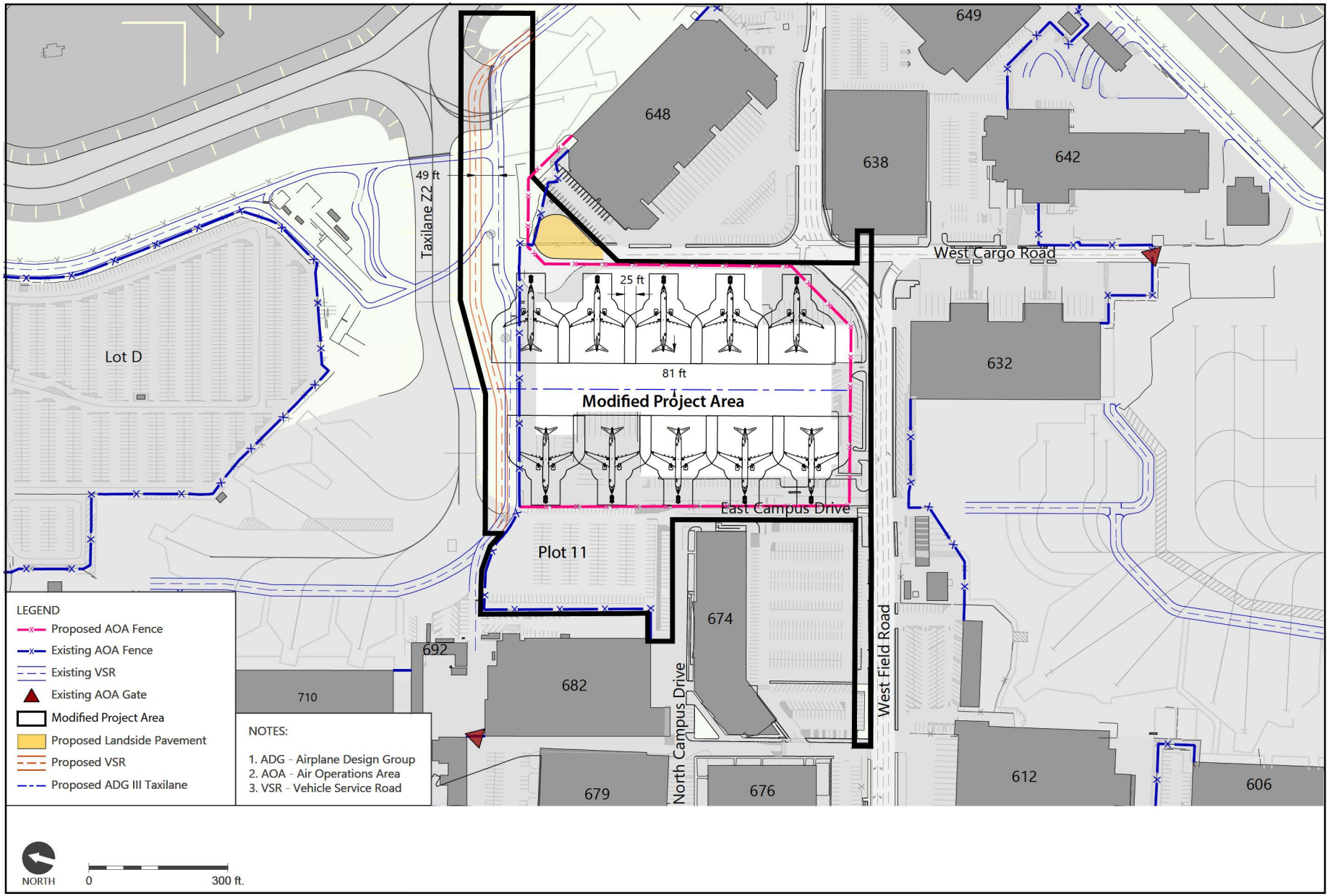
FIGURE 2
MODIFIED PROJECT

Table 1 Modified Project Summary

Modified Project Component	Building Area (sf)	Demolition (sf)	Total Net New (sf)
Demolish Building 660		(240,000)	***(240,000)***
Construct Building 662	285,000	—	***285,000***
Total	***285,000***	***(240,000)***	***45,000***
OTHER PROJECT COMPONENTS			
	Proposed (sf)	**Proposed Aircraft Parking Positions**	
Interim RON Parking	430,000	10	
Permanent RON Parking	210,000	3	
Elevated Walkway	25,000	—	

SOURCE: SFO Bureau of Planning and Environmental Affairs (2022).
sf = square feet

- Construct Building 662, which would be a two-story-plus-mezzanine, approximately 285,000-square-foot building with both airside and landside cargo handling facilities. Vehicle access to the new building would be provided south of the building via West Field Road or west of the building via East Campus Drive. The modified project would include approximately 76,500 square feet of paved area on the southwest side of the building to support approximately 15 vehicle parking spaces for visitors and up to 28 truck loading docks. A truck loading and docking area comprised of seven truck docks and two truck loading areas with access to the VSR would be located on the north side of the building. Building 662 would introduce approximately 75 additional employees on the project site.
- Construct approximately 210,000 square feet of permanent RON aircraft parking positions that could accommodate up to three ADG-III aircraft, accessible via Taxilane Z2. Construction of the permanent RON aircraft parking positions would comprise restriping of previously paved surfaces.
- Construct a 25,000-square-foot elevated walkway from Building 662 to Building 638 (West Field Employee Parking Garage) to the east and the West Field AirTrain platform and future Building 670 to the west, which will be dedicated to office use for existing tenant and City/Airport Commission employees from other administration facilities at the Airport.
- Associated improvements would include realignment of the AOA fence and a segment of a VSR to accommodate additional apron depth and reconfiguration of exterior lights and utility and stormwater management system infrastructure within the modified project area. The existing vehicle turnaround on West Cargo Road would be realigned as would access points between the site and West Field Road and East Campus Drive.
- Construction staging would occur at Plot 11, northwest of the project site.



SOURCES: San Francisco International Airport, Airport Layout Plan, 2021 (linework);
Landrum & Brown, December 2021 (proposed project);
Ricondo & Associates, Inc., March 2022 (exhibit); adapted by ESA in 2022

FIGURE 3
INTERIM REMAIN OVERNIGHT PARKING

Table 2 summarizes and compares the cargo facilities as evaluated in the Master Plan FEIR and the modified project. As shown in Table 2, based on the cargo space analyzed in the FEIR and subsequent new construction and demolition of cargo facilities, approximately 506,955 square feet of cargo space that was analyzed in the FEIR remains unbuilt. With implementation of the modified project, approximately 461,955 square feet of unbuilt cargo space would remain under the Master Plan FEIR. Note that the modified project would not generate new employees because tenants in other existing buildings would be relocated into the new facilities.

Table 2 Comparison of Cargo Facilities Evaluated in Master Plan FEIR and Modified Project Addendum

	New Construction (sf)	Demolished Buildings (sf)	Net New (sf)
Master Plan EIR	785,000[a]		***785,000***
Constructed to Date	190,920[b]	(243,300)[c]	***(52,380)***
Remaining under Master Plan (as of 8/2020)	***594,080***	***243,300***	***837,380***
PLANNED PROJECTS			
West Field Cargo Redevelopment Project	715,400	(384,975)[d]	***330,425***
Remaining under Master Plan (after Planned Projects)	***(121,320)***	***628,275***	***506,955***
MODIFIED PROJECT			
Plot 10F Demolition and Paving and Cargo Building 662	**285,000**	**(240,000)**[e]	***45,000***
Remaining under Master Plan after Modified Project	***(406,320)***	***868,275***	***461,955***

SOURCES: *SFO Master Plan* (November 1989); *SFO Master Plan Final Environmental Impact Report* (May 1992); *Addendum to Master Plan FEIR* (2003); *Addendum to Master Plan FEIR* (2021)

NOTES:

[a] Total square footage (sf) is based on the proposed net new construction identified for air freight in the 1992 Master Plan EIR.
[b] Total square footage dedicated to cargo for Building 648 (78,400 sf), completed in 2001, and Building 632 (112,520 sf), completed in 2014.
[c] Total square footage of cargo buildings demolished since the FEIR: Flying Tigers Hangar (108,000 sf), Cargo Building 7 (55,300 sf), Airborne Cargo Building (60,000 sf), and Building 16 (20,000 sf).
[d] This square footage includes demolition of Buildings 602 (6,575 sf), 606 (82,500 sf), 612 (114,550 sf), 624 (8,125 sf), 730 (42,675 sf), 710 (123,350 sf), and 750 (7,200 sf).
[e] Excludes the 206,000 square feet of existing paved area that would be demolished.

CONSTRUCTION

Demolition of Building 660 and the surrounding pavement would begin in February 2024 and be completed in July 2024. Construction of the interim RON aircraft parking pavement, which would entail grading and paving, would begin in August 2024 and be completed in May 2025. The interim RON aircraft parking positions would be in use for approximately 24 months, between 2025 and 2027. Construction of the proposed modified project, including the permanent RON parking, would begin in September 2027 and be completed by December 2029. Construction of the permanent RON parking also would entail grading and paving. Construction staging would occur at Plot 11, northwest of the project site.

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

- FAA, Airports Division. As a federally obligated public use airport, SFO shall coordinate with the FAA for environmental review per FAA Orders 1050.1F, Environmental Impacts: Policies and Procedures, and 5050.4B, National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions.
- 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.** Determination to proceed with the project; approval to issue design and construction bids and contracts.
- **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.

Project Setting

As shown in Figure 1, p. 5, the modified project site is currently paved and developed with Building 660, a portion of the adjacent AOA, and areas along West Field Road and West Cargo Road. The closest school is Belle Air Elementary School in San Bruno, located west of U.S. Highway 101 and approximately 1,900 feet northwest of the modified project site. The closest residential uses are located on Seventh Avenue in San Bruno, approximately 2,100 feet 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 3 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 3 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.	2025–2035
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 will demolish seven buildings and construct two consolidated cargo/ground service equipment facilities and one ground service equipment facility to accommodate current and future air cargo operations.	2024–2029
4	**Consolidated Administration Campus** – This project will develop a new consolidated administration building, a parking garage, expand the West Field AirTrain station platform to accommodate 4-car trains, and implement other associated improvements, including relocation of the AirTrain mechanical facility to the first floor of the parking garage and construction of two pedestrian bridges providing access between the administration facilities in the West Field area and the AirTrain station.	2025–2028
5	**Underground Pipeline and Pump Station Upgrades** – Improvements to underground industrial waste, sewer, and drainage pipelines and pump stations across Airport property.	Began in 2021, with work occurring on an ongoing basis
6	**Advanced Wastewater and Distribution System** – Construction and installation of infrastructure necessary to expand the use of reclaimed water at the Airport. The recycled water will be distributed Airport wide for restroom dual plumbing, cooling tower make-up water, irrigation, and other purposes.	Anticipated after 2025

SOURCE: SFO Five-Year Capital Plan (2022)

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.[8] 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

MASTER PLAN 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 Native American cultural activity could have occurred, such areas have been altered by the prior land reclamation and intense Airport development. Furthermore, a cultural resources report[9] found that while there are Native American 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.

[8] San Francisco Planning Department, *San Francisco International Airport Master Plan Final Environmental Impact Report*, Case No. 86.638E, State Clearinghouse No. 90030535, May 1992.
[9] David Chavez Associates, *Cultural Resources Evaluation for the San Francisco International Airport Master Plan EIR*, San Mateo County, California, August 1990, revised February 1991.

(Procedure for 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 Native American 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.[10]

MODIFIED PROJECT IMPACTS

HISTORIC ARCHITECTURAL RESOURCES

One age-eligible (i.e., 45 years or older) building, Building 660, is located within the modified project site. Building 660 was constructed in 1967 as the Airport post office for the U.S. Postal Service, and it continued operating in this capacity until it was vacated in March 2022. The building was evaluated in 2022 for eligibility for listing in the National Register of Historic Places (National Register) as part of the modified project.[11] The 2022 evaluation found that Building 660 is not individually significant under any National Register criteria and does not contribute to any known or potential historic districts on Airport property. Although the 2022 evaluation did not evaluate Building 660 for eligibility for listing in the California register, the planning department has determined that it concurs with the findings of the 2022 evaluation and that Building 660 is not considered a historical resource for the purposes of CEQA.[12]

One age-eligible building, Building 612, is located within 0.5-mile of the modified project site. In 2021, the planning department determined that Building 612 is not considered a historical resource for the purposes of CEQA.[13]

Therefore, the modified project would not result in any new or substantially greater impacts to historical resources beyond those identified in the FEIR and would not require new mitigation measures.

ARCHEOLOGICAL RESOURCES

ESA conducted a records search for the modified project site and all areas within 0.5 mile 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 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,

[10] Ibid.
[11] ESA, *Cultural Resources Survey Report for the Centralized Receiving and Distribution Center Project*, prepared for the Federal Aviation Administration and San Francisco International Airport, May 2022.
[12] San Francisco Planning Department, *Memorandum to File, SFO Plot 10F Demolition and Paving and Building 662*, November 21, 2022.
[13] San Francisco Planning Department, *Memorandum to File, SFO Shoreline Protection Program*, November 30, 2021.

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 Native American and historic-era archeological resources have been recorded between 0.3 and 0.4 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 mile eastward of the modified project site before meeting the open waters of the bay, and about 0.25 mile 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 Native American archeological resources and for historic period residential or farming-related resources because marshes may be very wet or inundated tidally or seasonally. However, Native American 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 Native American occupation during the past 2,000 years. However, this location at one time was adjacent to the bay shore and not too distant from creeks that entered the bay, a setting that was highly favored by prehistoric Native Americans. More than 400 Native American 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 Native American 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 the bay in this area.

As revealed in geotechnical cores, and discussed in more detail below, the geologic stratigraphy at the modified 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 geotechnical investigations conducted within and in the vicinity of the modified project site,[15,16,17,18] 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 22 to 29 feet below ground surface (bgs). The Young Bay Mud, deposited in an aquatic environment,[19] has low sensitivity for Native American archeological resources, with the possible exception of rare, isolated Native American human remains. Below the Young Bay Mud, the Upper Layered Sediments and underlying Old Bay Clay extend to depths upwards of approximately 144 feet bgs. As discussed above, the Upper Layered Sediments stratum may represent the land surface at the modified 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 Native American 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 modified project site, a geoarcheologist reviewed the coring logs from geotechnical borings conducted within and in the vicinity of the modified 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.

More than half of the cores, which for geotechnical purposes were not sampled continuously, did not include direct inspection of the Young Bay Mud/Upper Layered Sediments interface, and so did not provide definitive data on the upper stratum of the Upper Layered Sediments. Three of the cores in the

[14] Julius Schlocker, *Geology of the San Francisco North quadrangle*, California: U.S. Geological Survey, Professional Paper 782, 1974.
[15] Salem Engineering Group, *Geotechnical Engineering Investigation, Proposed Renovation of United States Postal Service International Service Center at San Francisco International Airport, 660 West Field Road, San Francisco, California*. Prepared BRW Architects, 2010.
[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.
[19] 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.

vicinity of the modified project site recovered samples of a stratum of black silty sand at the top of the Upper Layered Sediments, which could indicate the A horizon of an intact paleosol, and one core log noted rootlets at the Young Bay Mud/Upper Layered Sediments contact, which points to the presence of intact terrestrial or marsh soils. 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 is indicative of gleying (reducing) of an oxidized B Horizon due to minerals in the soil reacting to contact with seawater as the modified project site was inundated by the rising bay. In those cases, the organic-rich A horizon characteristic of an intact paleosol was not observed, having either never formed or having eroded away prior to burial.

A geotechnical study of a larger area of the Airport conducted in 2000 concluded that there is evidence for widespread erosion of the Upper Layered Sediments based on the presence of submerged and buried stream channels beneath Young Bay Mud on the pre-bay land surface; this pattern of erosion may have reduced the potential for survival of potentially habitable pre-bay land surfaces within the modified project site. A recent geoarcheological investigation at SFO for the Shoreline Protection Program provided a reconstruction of the pre-bay surface and revealed a system of incised paleochannels on the surface of the Upper Layered Sediments (or underlying geologic units [e.g., Old Bay Clay] where the Upper Layered Sediments were not present) that represent former drainages.[20] The geoarcheological investigation concluded that intact and partially-intact paleosols are present locally on the surface of the Upper Layered Sediments, but that erosion was widespread across the landscape prior to inundation by the Bay.

The geoarcheological investigation also provided an approximate timeframe of inundation for the area during the Holocene. Deeper portions of the identified paleochannels, being at lower elevations, would have been the first areas to have been inundated and to have infilled with Young Bay Mud as sea levels rose. Based on the stratigraphic data provided above, the modified project site was likely inundated between 4,000 and 6,000 years ago, a time during which bay region Native American populations are believed to have been sparse but increasing. On the basis of the early age of inundation, the potential for a resource to have been deposited at this location is relatively low; however, if a submerged cultural resource were present at this location, it would be highly significant as representative of a Native American period that is virtually unknown in this area.

On this basis, while it is possible that past environmental conditions do not favor the preservation of Native American archeological deposits that may have been present at the modified 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 Native American archeological resources. Any project impacts to such a resource would be significant.

Direct project excavations at the modified project site would disturb soils to 10 feet in 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, Building 662 would require pile foundations up to 200 feet in 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 Native

[20] Zimmer, Paul D., and Heidi Koenig, *San Francisco International Airport, Shoreline Protection Program, City and County of San Francisco. Archeological Sensitivity Assessment, Case No. 2020-004398ENV*. Prepared for Environmental Planning Division, city and County of San Francisco Planning Department. June 2021.

American deposit were present at the modified 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.,[21] 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 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 Native American archeological resources. For this reason, while this potential is uncertain, if a buried Native American deposit were present, it would be highly significant. Therefore, based on the project archeologist's recommendation and consistent with archeological treatments applied for projects in similar settings, planning department archeological staff required **Mitigation Measure CR1, Archeological Testing** for the modified project.[22] In accordance with this mitigation measure, geoarcheological testing would be undertaken at the modified project site prior to pile construction to more definitively ascertain whether significant Native American 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 modified 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 Native American 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

[21] 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.
[22] San Francisco Planning Department, *Preliminary Archeological Review Log,* November 9, 2022.

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 section 15064.5(a)(c).

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.

Paleoenvironmental Analysis of Paleosols. When a submerged paleosol is identified during the testing program, irrespective of whether cultural material is present, samples shall be extracted and processed for dating, flotation for paleobotanical analysis, and other applicable special analyses pertinent to identification of possible cultural soils and for environmental reconstruction.

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. The ERO and project sponsor shall work with the tribal representative or other representatives of descendant communities to identify the scope of work to fulfill the requirements of this mitigation measure, which may include participation in preparation and review of deliverables (e.g., plans, interpretive materials, artwork). Representatives shall be compensated for their work as identified in the agreed upon scope of work. 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 soil-disturbing activity shall comply with applicable State and federal laws. This shall include immediate notification of the Medical Examiner of the City and County of San Francisco. The ERO also shall be notified immediately upon the discovery of human remains. In the event of the Medical Examiner's determination that the human remains are Native American remains, the Medical Examiner shall notify 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(a)).

The landowner may consult with the project archeologist and project sponsor and shall consult with the MLD and CEQA lead agency on preservation in place or recovery of the remains and any scientific treatment alternatives. The landowner shall then make all reasonable efforts to develop an Agreement with the MLD, as expeditiously as possible, for the treatment and disposition, with appropriate dignity, of human remains and funerary objects (as detailed in CEQA Guidelines section 15064.5(d)). Per PRC 5097.98 (b)(1), the Agreement shall address and take into consideration, as applicable and to the degree consistent with the wishes of the MLD, the appropriate excavation, removal, recordation, scientific analysis, custodianship prior to reinterment or curation, and final disposition of the human remains and funerary objects. If the MLD agrees to scientific analyses of the remains and/or funerary objects, the archeological consultant shall retain possession of the remains and funerary objects until completion of any such analyses, after which the remains and funerary objects shall be reinterred or curated as specified in the Agreement.

Both parties are expected to make a concerted and good faith effort to arrive at an Agreement, consistent with the provisions of PRC 5097.98. However, if the landowner and the MLD are unable to reach an Agreement, the landowner, ERO, and project sponsor shall ensure that the remains and/or mortuary materials 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, consistent with state law.

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.

Cultural Resources Public Interpretation Plan. The project archeological consultant shall submit a Cultural Resources Public Interpretation Plan (CRPIP) if a significant archeological resource is discovered during a project. As directed by the ERO, a qualified design professional with demonstrated experience in displaying information and graphics to the public in a visually interesting manner, local artists, or community group may also be required to assist the project archeological consultant in preparation of the CRPIP. If the resource to be interpreted is a tribal cultural resource, the CRPIP shall be prepared in consultation with and developed with the participation of Ohlone tribal representatives. The CRPIP 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 CRPIP shall be sent to the ERO for review and approval. The CRPIP 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 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 Native American 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 modified 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**.[23]

Mitigation Measure CR2: 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).

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.

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

Archeological 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. The ERO and project sponsor shall work with the tribal representative or other representatives of descendant communities to identify the scope of work to fulfill the requirements of this mitigation measure, which may include participation in preparation and review of deliverables (e.g., plans, interpretive materials, and artwork). Representatives shall be compensated for their work as identified in the agreed upon scope of work. 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.

Paleoenvironmental Analysis of Paleosols. When a submerged paleosol is identified during the testing program, irrespective of whether cultural material is present, samples shall be extracted and processed for dating, flotation for paleobotanical analysis, and other applicable special analyses pertinent to identification of possible cultural soils and for environmental reconstruction.

Human Remains and Funerary Objects. The treatment of human remains and funerary objects discovered during any soil-disturbing activity shall comply with applicable State and federal laws. This shall include immediate notification of the Medical Examiner of the City and County of San Francisco. The ERO also shall be notified immediately upon the discovery of human remains. In the event of the Medical Examiner's determination that the human remains are Native American remains, the Medical Examiner shall notify 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(a)).

The landowner may consult with the project archeologist and project sponsor and shall consult with the MLD and CEQA lead agency on preservation in place or recovery of the remains and any scientific treatment alternatives. The landowner shall then make all reasonable efforts to develop an Agreement with the MLD, as expeditiously as possible, for the treatment and disposition, with appropriate dignity, of human remains and funerary objects (as detailed in CEQA Guidelines section 15064.5(d)). Per PRC 5097.98 (b)(1), the Agreement shall address and take into consideration, as applicable and to the degree consistent with the wishes of the MLD, the appropriate excavation, removal, recordation, scientific analysis, custodianship prior to reinterment or curation, and final disposition of the human remains and funerary objects. If the MLD agrees to scientific analyses of the remains and/or funerary objects, the archeological consultant shall retain possession of the remains and funerary objects until completion of any

such analyses, after which the remains and funerary objects shall be reinterred or curated as specified in the Agreement.

Both parties are expected to make a concerted and good faith effort to arrive at an Agreement, consistent with the provisions of PRC 5097.98. However, if the landowner and the MLD are unable to reach an Agreement, the landowner, ERO, and project sponsor shall ensure that the remains and/or mortuary materials 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, consistent with state law.

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.

Cultural Resources Public Interpretation Plan. The project archeological consultant shall submit a Cultural Resources Public Interpretation Plan (CRPIP) if a significant archeological resource is discovered during a project. As directed by the ERO, a qualified design professional with demonstrated experience in displaying information and graphics to the public in a visually interesting manner, local artists, or community group may also be required to assist the project archeological consultant in preparation of the CRPIP. If the resource to be interpreted is a tribal cultural resource, the CRPIP shall be prepared in consultation with and developed with the participation of Ohlone tribal representatives. The CRPIP 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 CRPIP shall be sent to the ERO for review and approval. The CRPIP 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 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 modified project site. The modified project would not result in any new or substantially greater impacts to historic resources 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 3, p. 11, would overlap with construction activities at the modified 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

MASTER PLAN 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 Native American archeological resources in the modified project site because reinforced concrete piles would be predrilled to bedrock (approximately 200 feet below ground). The City does not have record of any known tribal cultural resources in the modified project site. Consistent with prior consultation between the City and Ohlone tribal groups, all Native American sites identified would be considered to be potential tribal cultural resources.

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. These measures include procedures upon discovery of any Native American cultural resources for Native American monitoring during construction activities, Native American consultation on data recovery analysis, and a public interpretation program to be developed in consultation with Native American representatives.

Implementation of these mitigation measures 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 3, p. 11, would overlap with activities at the modified 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.[24]

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. With respect to employee and cargo travel demand, the main component of the modified project that would generate vehicle trips is the proposed approximately 285,000 square-foot Building 662. Other project components (e.g., RON aircraft parking, an elevated walkway connecting to other Airport facilities, and realignment of a VSR) would not affect vehicle trip generation. The size of the proposed cargo facilities would be within the parameters of—and consistent with—the cargo facilities studied as part of the Master Plan FEIR. As detailed in Table 3, p. 11, based on the cargo space analyzed in the Master Plan FEIR and subsequent new construction and demolition of cargo facilities, approximately 506,955 square feet of cargo space that was analyzed in the FEIR remains unbuilt. With implementation of the modified project, approximately 461,955 square feet of cargo space would remain unbuilt under the Master Plan FEIR. Therefore, the facilities included in the modified project would not result in an increase in employee activity (i.e., vehicle trips to and from the Airport) beyond what was evaluated in the Master Plan FEIR.

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

MODIFIED PROJECT IMPACTS

CONSTRUCTION

Demolition of Building 660 and the surrounding pavement would begin in February 2024 and be completed in July 2024. Construction of the interim RON aircraft parking pavement would begin in August 2024 and be completed in May 2025. The interim RON aircraft parking positions would be in use for approximately 24 months, between 2025 and 2027. Construction of Building 662 would begin in September 2027 and be completed by December 2029.

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 and West Field Road would be used to access the modified project site. Throughout construction of the modified project there would be additional construction trucks on these roadways, both 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).[25] 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 Airport property, at Plot 11, northwest of the modified project area; materials and equipment would not be staged on sidewalks.

Temporary closures of travel lanes or sidewalks on the roadway providing access to the modified project site from West Field Road may be required at times during certain construction activities (e.g., elevated walkway construction; 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 nearby SamTrans bus stop and AirTrain Station on North McDonnell Road and the SFO employee parking shuttle stop at the West Field Garage to the north of the modified project site on West Field 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,

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

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

As stated above, the modified project would include an elevated pedestrian walkway that would connect Building 662 and nearby facilities to the West Field Road AirTrain station. The elevated pedestrian walkway would limit pedestrian interaction with traffic on West Field Road and improve access between the future Building 670, the West Field Parking Garage, and public transit (SamTrans at North McDonnell Road, BART via the AirTrain). 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 modified project site with implementation of the modified project. Additionally, the proposed elevated pedestrian walkway would minimize pedestrian crossings along West Field Road and at the North McDonnell Road/West Field Road intersection by providing a grade-separated pedestrian connection from the modified project site 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 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[26] 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

[26] San Francisco Planning Department, Transportation Impact Analysis Guidelines Update: Summary of Changes Memorandum, February 14, 2019, last updated in October 2019, https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines, accessed July 20, 2022.

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 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

The modified project would introduce approximately 75 employees on the project site, and the size of Building 662 would be within the parameters of—and consistent with—the cargo facilities studied as part of the Master Plan FEIR. Therefore, it would not result in an increase in employment beyond that analyzed in the Master Plan FEIR. Furthermore, the modified project site meets the proximity to transit stations screening criterion due to its location less than a half-mile from the San Francisco International Airport BART Station, a major transit stop.[27] In addition to BART, the modified project site is directly served by the AirTrain and SamTrans 292, 397, and 398 bus routes. Consequently, the modified project would not cause an increase in travel demand as compared to the Master Plan FEIR and would not result in a substantial increase in vehicle miles traveled (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 modified project site and the larger proposed elevated walkway network above West Field Road. These types of transportation network alterations qualify as “active transportation, rightsizing (i.e., Road Diet) and Transit Project,” or “other minor transportation project” as defined in the Transportation Impact Analysis Guidelines for Environmental Review. 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, the modified project would result in less-than-significant impacts related to VMT and induced automobile travel, and no mitigation measures are required. Therefore, the modified project would not result in 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.

[27] 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.

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 modified 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 and would not result in any new or substantially greater impacts with respect to loading beyond those identified in the Master Plan FEIR. No new mitigation measures would be required.

PARKING

As described in the modified project description, Building 662 would include approximately 15 vehicle parking spaces for visitors and up to 28 truck loading docks. An additional 75 parking stalls designated for use by Building 662 employees would be provided at the approved, but not-yet-built West Field Parking Garage, accessible via the proposed elevated pedestrian walkway connecting Building 662 and nearby facilities to the West Field Road AirTrain station. A truck loading area consisting of seven truck docks and two truck loading areas with access to the VSR, would be located on the north side of the building between Building 662 and the RON aircraft parking positions. Compared to the existing Building 660 that would be demolished as part of the modified project, which contains approximately 33 public and 37 employee parking spaces, this represents a decrease in off-street parking capacity at the modified project site of approximately 55 spaces.

As stated above, 75 additional spaces at the approved, but not-yet-built West Field Parking Garage would be allocated for use by Building 662 employees, representing a net increase in the overall number of parking spaces. The Master Plan FEIR analyzed a net increase of 7,340 parking spaces, and Addendum 6 to the Master Plan FEIR evaluated the Consolidated Administration Campus' proposed increase of 1,105 net new parking spaces at the West Field Parking Garage.[28] Since the proposed increase in parking at the Consolidated Administration Campus was environmentally cleared, those parking spaces that would be allocated to the West Field Parking Garage for use by Building 662 employees are not analyzed in this addendum.

The reduced parking supply at the modified project site would result in a lower ratio of employee parking spaces to employees, as compared to that analyzed in the Master Plan FEIR. Therefore, the modified project would not conflict with efforts to reduce single-occupancy vehicle travel. It is noted that a parking shortfall, in and of itself, would not result in a significant impact on the environment.[29] Secondary effects related to safety or accessibility for pedestrians, bicycling, or driving; emergency access; and delays to public transit, would not occur because the proposed supply of 15 visitor parking spaces would be adequate to accommodate proposed Building 662 cargo/warehouse uses. In the unlikely event that parking demand cannot be accommodated, vehicles would drive to other nearby Airport parking facilities. Furthermore, the modified project site is accessible by other travel modes (e.g., BART, AirTrain, SamTrans) that could be used by visitors as an alternative to driving and parking if parking is not available. As such, the modified project would not result in new significant impacts that were not

[28] San Francisco Planning Department, Addendum 6 to the San Francisco International Airport Master Plan Final Environmental Impact Report: SFO Consolidated Administration Campus. May 17, 2021. Case No. 2019-006583ETM.
[29] San Francisco Planning Department, *Transportation Impact Analysis Guidelines*, Appendix O, Vehicular Parking, February 14, 2019, last updated October 2019, https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines, accessed July 20, 2022.

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 modified project site or at the neighborhood level. While the current context of cumulative projects has changed from that analyzed in the Master Plan FEIR (see Table 3, p. 11), 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 not exceed the amount of cargo space analyzed in the Master Plan FEIR and, therefore, would not cause an increase in travel demand as compared to the Master Plan FEIR. Based on this, the modified project would not result in any new or greater 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.

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.[30] However, 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, including mitigation measures I.C.1.a, Noise Reduction Measures; I.C.1.b, Predrilling Holes; I.C.1.c, Restrictions on Pile Driving; and I.C.1.d, Construction Barriers. 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 Commission's adoption of the Statement of Overriding Considerations.[31]

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.

[30] State of California Governor's Office of Planning and Research, *General Plan Guidelines*, Appendix D: Noise Element Guidelines.
[31] Airport Commission, SFO Master Plan, *Findings Related to the Approval of the SFIA Master Plan*, November 3, 1992, pp. 58 to 62.

MODIFIED PROJECT IMPACTS

CONSTRUCTION NOISE AND VIBRATION

The nearest sensitive receptors to the modified project site are the Belle Air Elementary School at 450 Third Avenue in San Bruno (approximately 1,900 feet northwest of the modified project site and U.S. 101) and single-family residences at Seventh Avenue in San Bruno (approximately 2,100 feet northwest of the modified project site and U.S. 101).

The duration of construction for the modified project would be 42 months (approximately 15 months for demolition of Building 660 and construction of the interim RON aircraft parking and approximately 27 months for construction of Building 662, the permanent RON aircraft parking positions, the elevated walkway, and the realignment of the AOA fence and a segment of the VSR); 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, front end loaders, graders, rollers, bulldozers, construction cranes, and dump trucks, may cause temporary increases in vibration levels near the modified project site. Due to the types of land uses in the area immediately surrounding the modified project site and the approximately 1,900-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).[32] 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 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 modified 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.[33]

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[32] San Francisco International Airport, *Airport Standard Construction Measures Implementation in Construction Contracts and Maintenance Projects*, March 3, 2020.
[33] 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 July 13, 2022.

As shown in **Table 4**, 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 demolition and redevelopment, which would occur 80 and 100 feet from Buildings 674 and 638, respectively. These vibration levels would be below the building damage thresholds (0.5-inch-per-second 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 4 Vibration Source Levels for Modified Project 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 would not affect the level of air traffic and thus would have no effect on passenger travel to and from the Airport. With respect to employee and cargo travel demand, the main component of the modified project that would generate vehicle trips is the proposed approximately 285,000 square-foot Building 662, which would add approximately 75 employees to the project site. Other project components (e.g., RON aircraft parking, an elevated walkway connecting to other Airport facilities, and realignment of a VSR) would not affect vehicle trip generation. The size of the proposed Building 662 would be within the parameters of—and consistent with—the cargo facilities studied as part of the Master Plan FEIR. Consequently, 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 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, including aircraft noise related to RON aircraft parking, would likewise be comparable to that identified in the Master Plan FEIR since the modified project includes the same types of buildings, mechanical equipment, and RON aircraft parking positions as analyzed in the FEIR. The modified project also would not induce aircraft operations, and both the interim and permanent RON aircraft parking would occur in generally the same area as under existing conditions. 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 3, p. 11, 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 3,100 feet from the modified project site. At this distance, noise from impact pile driving would be reduced to 58 dBA,[34] which is well below the existing noise level at the modified 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, which were the pollutants analyzed in the FEIR. 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 also 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 Master Plan FEIR evaluated emissions from aircraft and ground support vehicles as well as the construction and operation of cargo facilities.

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 mitigation. With implementation of Mitigation Measure I.B.1.a, Construction Period Activities (which 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 levels. The Master Plan FEIR stated that hydrocarbons would be emitted

[34] Calculated using the Roadway Construction Model (version 1.1) of the Federal Highway Administration (2008) assuming no intervening structures.

from paving activities, and other criteria air 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 5** 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 Program; I.B.1.b, Manage Aircraft Operating Procedures; and l.B.1.c Adopt the Transportation System Management Program,[35] operational emissions from the Master Plan would be reduced, but not to less-than-significant levels.

Table 5 Master Plan FEIR – Total Daily Air Pollutant Emissions

	HC[a]	NOx	CO	SOx	PM_{10}[a]
POUNDS PER DAY					
1992	3,800	4,000	17,600	0	1,200
2006	11,000	8,400	48,600	200	3,400
1992 Air District Thresholds	150	150	550	150	150
2006 Air District Thresholds	80	80	N/A[b]	N/A[b]	80
Exceed Threshold?	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**

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

NOTE:

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

[b] N/A = not applicable; the air district did not provide significance thresholds for CO and SOx in 2006.

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.

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 U.S. 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

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

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 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 cargo facilities and emissions associated with construction of the modified project.

Construction of the modified project would begin in the year 2024 and would be completed by 2029 (excluding the approximately 24 months the modified project site would be used for interim RON aircraft parking). Since the Master Plan FEIR does not provide a specific construction schedule but only a range from 1990 through 2006, construction of the Master Plan cargo facilities is assumed to span approximately the same number of years, beginning in 1992 when the Master Plan FEIR was adopted. As such, this analysis uses historic emission rates for off-road and on-road sources for the purpose of quantifying emissions associated with construction of the Master Plan facilities. Emissions resulting from construction of the modified project are based on emission factors for off-road and on-road vehicles associated with aforementioned construction years of 2024 through 2029. Construction emissions from the Master Plan cargo facilities and the modified project resulting from off-road construction sources were modeled using California Emissions Estimator Model (CalEEMod) version 2022.1. Construction emissions resulting from on-road vehicle trips were modeled outside of CalEEMod using EMFAC2021 emission factors.

Operational emissions were not analyzed for either the Master Plan cargo facilities or the modified project since the modified project would be within the development envelope analyzed in the Master Plan FEIR. The interim and permanent RON aircraft parking also would not induce aircraft operations and would occur in generally the same area as under existing conditions. Therefore, air quality emissions from operation of the modified project would not result in a new significant effect or a substantial increase in the severity of air quality effects compared to the FEIR. For this reason, operational air quality emissions are not analyzed further.

With respect to criteria air pollutants, 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. [36]

[36] 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.

As discussed above, the 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. EMFAC2021 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 2029 (final construction 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.[37]

MODIFIED PROJECT IMPACTS

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. Construction duration is assumed to be approximately the same for both the Master Plan cargo facilities and the modified project. However, given the implementation of the Off-Road Regulation, emissions resulting from the construction fleet for the modified project would be less than the construction fleet emissions resulting from the cargo facilities analyzed in the Master Plan FEIR. Additionally, compliance with the ASCM regarding dust control during construction (Division 01 57 00)[38] would reduce the modified project's impact regarding fugitive dust emissions to a less-than-significant level, as discussed in further detail below. **Table 6** shows the construction emissions estimated for the modified project (including the RON aircraft parking, the elevated walkway connecting to other Airport facilities, and realignment of a VSR) compared to the construction emissions estimated for the Master Plan cargo facilities. Both emissions scenarios include implementation of fugitive dust reduction as required based on the year construction would occur. As shown in Table 6, the modified project would have less daily construction emissions than the cargo facilities component 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 as compared to the Master Plan FEIR.

[37] Environmental Science Associates, *SFO Consolidated Administration Campus: Air Quality Supporting Information*, May 17, 2021.
[38] San Francisco International Airport. *Airport Standard Construction Measures Implementation in Construction Contracts and Maintenance Projects*, March 3, 2020.

Table 6 **Regional Construction Emissions (Unmitigated) (lbs/day)**

	ROG	NOx	PM_{10}[a]	$PM_{2.5}$[a]
MAXIMUM DAILY – MASTER PLAN CARGO FACILITIES				
1992	50	433	26	26
1993	56	376	29	29
1994	56	376	29	29
1995	56	376	29	29
1996	56	376	29	29
1997	56	376	29	29
1998	56	376	29	29
1999	75	391	31	31
Maximum Daily	*75*	*433*	*31*	*31*
MAXIMUM DAILY – MODIFIED PROJECT				
2024	11	15	<1	<1
2025	36	2	<1	<1
2026	0	0	0	0
2027	9	6	<1	<1
2028	48	4	<1	<1
2029	53	7	<1	<1
Maximum Daily	*53*	*15*	*<1*	*<1*
Difference	***(22)***	***(418)***	***(30)***	***(30)***

SOURCES: ESA 2020; ESA 2022.

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 1,900 feet northwest 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.

CARBON MONOXIDE HOTSPOTS

The Master Plan FEIR states that by 2006, the CO standard would only be violated at one intersection and at three intersections under the 1992 traffic conditions. As discussed under "Approach to Analysis" above, the modified project's operational emissions would be less than emissions in the Master Plan FEIR, including emissions of CO. Since preparation of the FEIR, the state has experienced an overall decrease in CO emissions from vehicles, which has reduced CO hotspot 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 impacts as compared to those in the Master Plan FEIR.

CONSISTENCY WITH THE 2017 CLEAN AIR PLAN

Through implementation of Mitigation Measure I.B.1.a, Construction Period Activities, 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 by encouraging alternative transportation through the implementation of programs such as a vehicle sharing program, as well as installation of designated bike lanes and storage racks throughout the Airport. 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 cargo building land uses. Therefore, the modified project would be consistent with the 2017 Clean Air Plan.

ODORS

The Master Plan FEIR did not analyze potential odor impacts associated with the 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 after construction is complete. During operations, the modified project's 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 mitigation 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.[39]

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 combine with other projects in the vicinity to result in a significant cumulative impact.

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.

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 cumulative projects has contributed and will continue to contribute to global climate change and its associated environmental impacts. As such, this analysis is in a cumulative context only, and the analysis of this resource topic does not include a separate project-level impact discussion.

On April 20, 2022, the air district adopted updated GHG thresholds.[40] 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, the updated thresholds for land use projects, such as the modified project, maintains the air district's previous GHG threshold that allow projects that are consistent with a GHG reduction strategy to conclude that the project's GHG impact is less than significant. San Francisco's 2017 GHG Reduction Strategy Update[41] presents a comprehensive assessment of policies, programs, and

[39] Bay Area Air Quality Management District, CEQA Air Quality Guidelines, May 2017, page 2-1.
[40] Bay Area Air Quality Management District, CEQA Thresholds and Guidelines Update, https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines, accessed May 10, 2022.
[41] SF Planning Department, 2017 Greenhouse Gas Reduction Strategy Update, Revised July 2017, https://sfplanning.s3.amazonaws.com/sfmea/GHG/GHG_Strategy_October2017.pdf, accessed October 3, 2022.

ordinances that collectively represent San Francisco's GHG reduction strategy in compliance with the air district's guidelines and CEQA Guidelines. These GHG reduction actions have resulted in a 41 percent reduction in GHG emissions in 2019 compared to 1990 levels,[42] which far exceeds the goal of 2020 GHG emissions equaling those in 1990 set in Executive Order S-3-05[43] and the California Global Warming Solutions Act.[44] The City has also met and exceeded the 2030 target of 40 percent reduction below 1990 levels set in the California Global Warming Solutions Act of 2016[45] and the air district's 2017 Clean Air Plan[46] more than 10 years before the target date.

San Francisco's GHG reduction goals, updated in July 2021 by Ordinance 117-02,[47] are consistent with, or more aggressive than, the long-term goals established under Executive Orders S-3-05,[48] B-30-15,[49] B-55-18,[50] and the California Global Warming Solutions Act of 2016.[51] The updated GHG ordinance demonstrates the City's commitment to continued GHG reductions by establishing targets for 2030, 2040, and 2050 and setting other critical sustainability goals. In particular, the updated ordinance sets a goal to reach net-zero sector-based GHG emissions by 2040 and sequester any residual emissions using nature-based solutions.[52] Thus, the City's GHG reduction goal is consistent with the state's long-term goal of reaching carbon neutrality by 2045. The updated GHG ordinance requires the San Francisco Department of the Environment to prepare and submit to the mayor a climate action plan (CAP) by December 31, 2021. The CAP, which was released on December 8, 2021, and will be updated every five years, carries forward the efforts of the City's previous CAPs and charts a path toward meeting the GHG commitments of the Paris Agreement (e.g., limit global warming to 1.5 degrees Celsius) as well as the reduction targets adopted in the GHG ordinance.

In summary, the CEQA Guidelines and air district-adopted GHG thresholds allow projects consistent with an adopted GHG reduction strategy to determine a less-than-significant GHG impact. San Francisco has a

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[42] San Francisco Department of the Environment, San Francisco's 2019 Carbon Footprint, https://sfenvironment.org/carbonfootprint, accessed May 10, 2022.
[43] Office of the Governor, Executive Order S-3-05 (June 1, 2005), https://www.library.ca.gov/wp-content/uploads/GovernmentPublications/executive-order-proclamation/5129-5130.pdf, accessed May 10, 2022.
[44] California Legislative Information, Assembly Bill 32 (September 27, 2006), http://www.leginfo.ca.gov/pub/05-06/bill/asm/ab_0001-0050/ab_32_bill_20060927_chaptered.pdf, accessed May 10, 2022.
[45] California Legislative Information, Senate Bill 32 (September 8, 2016), https://leginfo.legislature.ca.gov/faces/billPdf.xhtml?bill_id=201520160SB32&version=20150SB3288CHP, accessed May 10, 2022.
[46] Bay Area Air Quality Management District, *Clean Air Plan* (September 2017), http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans, accessed May 10, 2022.
[47] San Francisco Board of Supervisors, Ordinance No. 117-21, File No. 210563 (July 27, 2021), https://sfbos.org/sites/default/files/o0117-21.pdf, accessed May 10, 2022. San Francisco's GHG reduction goals are codified in Environment Code section 902(a) and include the following goals: (1) by 2030, a reduction in sector-based GHG emissions of at least 61 percent below 1990 levels; (2) by 2030, a reduction in consumption-based GHG emissions equivalent to a 40 percent reduction compared to 1990 levels; (3) by 2040, achievement of net-zero sector-based GHG emissions by reducing such emissions by at least 90 percent compared to 1990 levels and sequestering any residual emissions; and (4) by 2050, a reduction in consumption-based GHG emissions equivalent to an 80 percent reduction compared to 1990 levels.
[48] Executive Order S-3-05 sets forth a goal of an 80 percent reduction in GHG emissions by 2050. San Francisco's goal of net-zero sector-based emissions by 2040 requires a greater reduction of GHG emissions.
[49] Office of the Governor, Executive Order B-30-15 (April 29, 2015), https://www.ca.gov/archive/gov39/2015/04/29/news18938/, accessed May 22, 2022. Executive Order B-30-15 sets a state GHG emissions reduction goal of 40 percent below 1990 levels by 2030. San Francisco's 2030 sector-based GHG reduction goal of 61 percent below 1990 levels requires a greater reduction of GHG emissions.
[50] Office of the Governor, Executive Order B-55-18 (September 18, 2018), https://www.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf, accessed May 10, 2022. Executive Order B-55-18 establishes a statewide goal of achieving carbon neutrality as soon as possible, but no later than 2045, and achieving and maintaining net negative emissions thereafter. San Francisco's goal of net-zero sector-based emissions by 2040 is a similar goal but requires achievement of the target five years earlier.
[51] Senate Bill 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 GHG emissions be reduced by 40 percent below 1990 levels by 2030. San Francisco's 2030 sector-based GHG reduction goal of 61 percent below 1990 levels requires a greater reduction of GHG emissions.
[52] Nature-based solutions are those that remove remaining emissions from the atmosphere by storing them in natural systems that support soil fertility or employing other carbon farming practices.

GHG reduction strategy that is consistent with near and long-term state and regional GHG reduction goals and is effective because the City has demonstrated its ability to meet state and regional GHG goals in advance of target dates. Therefore, projects that are consistent with San Francisco's GHG reduction strategy would not result in GHG emissions that would have a significant effect on the environment, and would not conflict with state, regional, or local GHG reduction plans and regulations.

The following analysis of the modified project's impact on climate change focuses on the modified project's contribution to cumulatively significant GHG emissions. As noted above, 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 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).[53]

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).[54] 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.[55]

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;

[53] 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 May 10, 2022.
[54] 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 May 10, 2022.
[55] Ibid.

- 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;
- 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 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, Emergency Rescue Fire Fighting Facility #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 Harvey Milk 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;[56]
- 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;

[56] The Good Traveler, https://thegoodtraveler.org/, accessed May 10, 2022.

- 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.

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 cargo 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.[57] 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 cargo 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.

[57] San Francisco Planning Department, *Compliance Checklist Table for Greenhouse Gas Analysis: Plot 10F Demolition and Paving and Cargo Building 662 Project*, December 1, 2022.

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 modified project site is adjacent to cargo and administration buildings within the existing Airport, which does not contain any natural 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 modified 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 2,100 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 introduce only approximately 75 employees on the project site, 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 in the FEIR, 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).

Above-ground structures that would be developed as part of the modified project include the two-level, 72-foot-tall (approximately 85 feet to the top of the mechanical equipment) Building 662 and an elevated walkway that would be constructed from Building 662 to other facilities adjacent to West Field Road. Wind speeds at outdoor areas and sidewalks surrounding the modified project site are already generally

reduced by the existing Airport buildings, as well as by elevated roadway structures. Any change in wind speeds or shadow resulting from the modified project would not affect public parks or other public recreational areas due to the distance between the modified project site and the closest recreational areas (the nearest of which is Lions Park, approximately 2,100 feet west of the modified project site, across U.S. 101, in the City of San Bruno) and intervening infrastructure and topography. 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 significant cumulative impacts related to wind or 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 infrastructure existed to accommodate forecast growth in demand for utilities, 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) 2020 Urban Water Management Plan[58] considers SFO a "retail customer" and estimates that current and projected water supplies will be sufficient to meet future retail demand[59] 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).[60] 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

[58] San Francisco Public Utilities Commission, *2020 Urban Water Management Plan for the City and County of San Francisco*, adopted June 11, 2021, https://www.sfpuc.org/about-us/policies-plans/urban-water-management-plan, accessed September 30, 2022.
[59] "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.
[60] 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 May 10, 2022.

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 operational solid waste demand from the modified project would be adequately served by the Hay Road Landfill in Solano County, 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 introduce only approximately 75 employees on the project site; therefore, it would not result in an increase in employment beyond that analyzed in the Master Plan FEIR. Thus, the 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 2,100 feet west of the modified project site, across U.S. 101, 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 cargo and mail 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 mitigation measures to ensure impacts on cultural resources would be less than significant.

With implementation of identified mitigation measures, the modified project would not result in cumulatively considerable impacts on land use and planning, 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, agriculture 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 planning 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 for Lisa Gibson
Environmental Review Officer

12/15/2022
Date of Determination

cc: Project Sponsor
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