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# ADDENDUM 7 TO ENVIRONMENTAL IMPACT REPORT

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| *Date of Addendum:* | May 17, 2021 |
| *Date of EIR Certification:* | May 28, 1992 |
| *EIR Title:* | San Francisco International Airport Master Plan Final Environmental Impact Report |
| *EIR Case No.:* | **1986.638E** |
| *Project Title:* | **West Field Cargo Redevelopment** |
| *Project Case No.:* | 2020-008656ENV |
| *Project Site:* | 33 acres; Plot 9 adjacent to North McDonnell Road and West Field Road; and Plot 12 adjacent to North McDonnell Road and West Area Drive |
| *Project Sponsor:* | San Francisco International Airport, Audrey Park, 650.821.7844, audrey.park@flysfo.com |
| *Lead Agency:* | San Francisco Planning Department |
| *Staff Contact:* | Tania Sheyner, 628.652.7578, tania.sheyner@sfgov.org |

## Overview

The project sponsor, the City and County of San Francisco, acting by and through the San Francisco Airport Commission (Airport Commission) has submitted to the San Francisco Planning Department Environmental Planning Division (EP) a project description and related materials for proposed revisions to its West Field Cargo Redevelopment project at San Francisco International Airport (SFO or the Airport). On May 28, 1992, the San Francisco Planning Commission (planning commission) certified the San Francisco International Airport Master Plan Final Environmental Impact Report (Planning Case No. 1986.638E; Master Plan FEIR or FEIR).[1] The Master Plan encompasses landside facilities and circulation systems designed to increase operational efficiency and accommodate forecast demand of 51.3 million annual passengers.

Since adoption of the Master Plan, the West Field Cargo Redevelopment as envisioned in the Master Plan has been modified. These revisions were evaluated in an addendum to the FEIR published in 2003 (2003 Addendum). The Airport Commission approved the modifications that same year and a portion of the West Field Cargo facilities has subsequently been constructed.

Since adoption of the Master Plan and publication of the 2003 Addendum, the West Field cargo redevelopment as envisioned in the Master Plan has been further modified and includes demolition of seven buildings, construction of three new buildings, and reconfiguration of over 1 million square feet of apron

[1] San Francisco Planning Department, San Francisco International Airport Master Plan Final Environmental Impact Report, Case No. 1986.638E, State Clearinghouse No. 90030535, May 28, 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 (2020-008656ENV). Project application materials can be viewed by clicking on the "Related Documents" link under the ENV case number.

areas to accommodate current and future air cargo operations and remain overnight parking for aircraft.[2] These modifications comprise the West Field Cargo Redevelopment project and is 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 San Francisco Planning Commission, and no additional environmental review beyond the analysis herein is required.

# Background

## Master Plan FEIR

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

The Master Plan focused on accommodating passenger and cargo growth at the Airport through the development of improved facilities and circulation patterns for all Airport-owned lands (excluding the undeveloped area west of U.S. Highway 101, which is referred to as the West of Bayshore).[3] The major Master Plan improvements included in the FEIR analyses were:

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

[2] Remain overnight aircraft parking areas are remote aprons used to stage or store aircraft on a temporary basis. Federal Aviation Administration, Advisory Circular 150/5300-13, Airport Design. Available online: *https://www.faa.gov/documentLibrary/media/Advisory_Circular/150-5300-13A-chg1-interactive-201907.pdf*.

[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).

- New administration/office facilities completed in 2000 and 2018.[4]

### CARGO FACILITIES IN THE 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 an existing facility, for a net total of 234,000 square feet of new construction.

Overall, for the combined near-term and long-term cargo projects, the Master Plan analyzed demolition of approximately 301,300 square feet and construction of approximately 1,806,300 square feet, for a net new total of 785,000 square feet of new cargo facilities. Since adoption of the Master Plan, a 78,400-square-foot cargo facility (Building 628) was completed in 2001 and a 112,520-square-foot cargo facility (Building 632) was completed in 2014.

## 2003 Addendum

In 2003, an addendum was published addressing revisions to the approved Master Plan air freight/cargo and administrative/office facilities. This addendum analyzed the Airport's proposal to increase the size of the administration facilities in the West Field and to reduce the size of cargo facilities 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 analyzed in the 2003 Addendum were within the parameters of the cargo facilities studied in the Master Plan FEIR, the 2003 Addendum determined 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

Since adoption of the Master Plan, the cargo facilities as envisioned in the Master Plan have been modified. Several of the existing cargo buildings are antiquated and are near or at the end of their serviceable lives. Additionally, cargo operations at SFO have changed since construction of the existing cargo buildings, with a pronounced shift from freight cargo, distributed via cargo aircraft, to belly cargo, distributed via passenger aircraft, since the Airport's cargo volume peak in the 1990s. The Airport now proposes to demolish seven cargo and ground support and equipment (GSE) facilities, and construct two consolidated cargo/GSE

[4] A separate addendum is currently being prepared for the SFO Consolidated Administration Campus project. The Consolidated Administration Campus project is a separate project from the West Field Cargo Redevelopment project because they would be constructed independent of each other, at different times and in different locations on Airport property.

facilities and one GSE facility,[5] as shown in **Figure 1** and summarized in **Table 1**. The consolidated cargo/GSE facilities would include warehouse and office space, apron[6] area for GSE operations and remain overnight aircraft parking, and area for vehicle parking and cargo docks. In addition, the modified project would repave areas for vehicle parking, cargo truck loading, and remain overnight aircraft parking. The goal for the modified project is to consolidate cargo operations in the West Field for increased efficiency and access.

**Table 1 Modified Project Summary**

| Modified Project Component | Building Area (sf) | Demolition (sf) | Total Net New (sf) |
|---|---|---|---|
| Building 626 | 392,000 | (211,750)[a] | 180,250 |
| Building 720 | 306,600 | (166,025)[b] | 140,575 |
| Building 742 | 16,800 | (7,200)[c] | 9,600 |
| ***Total*** | ***715,400*** | ***(384,975)*** | ***330,425*** |
| **OTHER PROJECT COMPONENTS** | | | |
| | **Proposed** | **To Be Demolished** | **Total Net New** |
| Cargo Docks | 100[d] | 84[e] | 16 |
| Vehicle Parking Spaces | 163[f] | 690[g] | (527) |
| Airside Apron Staging (sf) | 1,051,000 | 1,051,000 | 0 |

SOURCE: SFO Bureau of Planning and Environmental Affairs, 2020.

NOTES:

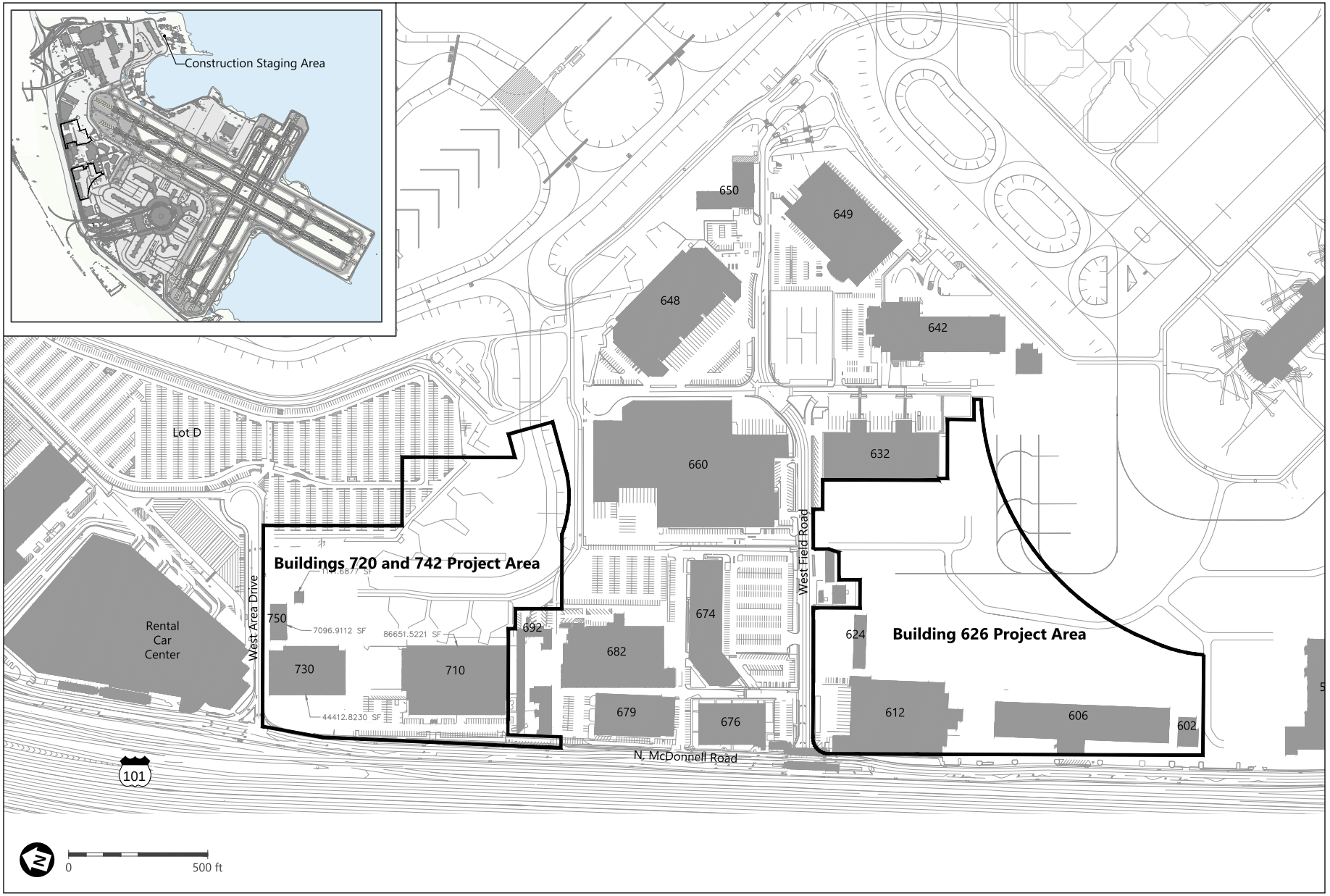
sf = square feet

[a] Construction of Building 626 would require demolition of Building 602 (6,575 sf), Building 606 (82,500 sf), Building 612 (114,550 sf), and Building 624 (8,125 sf), which equals 211,750 sf.
[b] Construction of Building 720 would require demolition of Building 710 (123,350 sf) and Building 730 (42,675 sf), which equals 166,025 sf.
[c] Construction of Building 742 would require demolition of Building 750 (7,200 sf), which equals 7,200 sf.
[d] Building 626 would provide 45 cargo docks on the north side of the facility, and Building 720 would provide 55 cargo docks along North McDonnell Road.
[e] The modified project would demolish 54 cargo docks for construction of Building 626 and 30 cargo docks for Building 720.
[f] Building 626 would provide 52 vehicle parking spaces, Building 720 would provide 77 parking spaces, and Building 742 would provide 34 vehicle parking spaces.
[g] The modified project would demolish 206 vehicle stalls in Lot D; 290 stalls near Building 710, Building 730, and Building 750; 99 stalls adjacent to Building 624; 56 stalls between Building 606 and Building 612; and 39 stalls adjacent to Building 606 and Building 602. The number of vehicle stalls include City/Airport carpool vehicle stalls.

**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 837,380 square feet of cargo space that was analyzed in the FEIR remains unbuilt. With implementation of the modified project, approximately 506,955 square feet of unbuilt cargo space would remain unbuilt under the Master Plan FEIR. Note that the modified project also would not generate new employees because just tenants in the existing buildings proposed to be demolished would be relocated into the new facilities, as further described below.

[5] Ground service equipment is generally used to service aircraft between flights.

[6] An *apron* is the area of an airport where aircraft are parked, unloaded or loaded, refilled, or boarded.




SOURCE: SFO Bureau of Planning and Environmental Affairs, September 2020.

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**FIGURE 1**
**MODIFIED PROJECT AREA**

**Table 2 FEIR and Modified Project Comparison**

| | Master Plan FEIR (sf) | Built as of 2020 (sf) | Remaining under Master Plan (sf) | Modified Project (sf) | Remaining Under Master Plan after Implementation of Modified Project (sf) |
|---|---|---|---|---|---|
| New Construction (Buildings 626, 720, and 742) | 785,000[a] | 190,920[b] | 594,080 | 715,400 | |
| Demolished Buildings (Buildings 602, 606, 612, and 624, 710, 730, 750) | | (243,300)[c] | 243,300 | (384,975)[d] | |
| **Total** | **785,000** | | **837,380** | | **506,955** |

SOURCES: SFO Master Plan, November 1989; SFO Master Plan Final Environmental Impact Report, May 1992; Addendum to Master Plan FEIR, 2003.

NOTES:

[a] Total square footage is based on the proposed net new construction identified for air freight in the 1992 Master Plan FEIR.
[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 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] Total square footage of buildings to be demolished under the modified project: Building 602 (6,575 sf), Building 606 (82,500 sf), Building 612 (114,550 sf), Building 624 (8,125 sf), Building 710 (123,350 sf), Building 730 (42,675 sf), and Building 750 (7,200 sf).

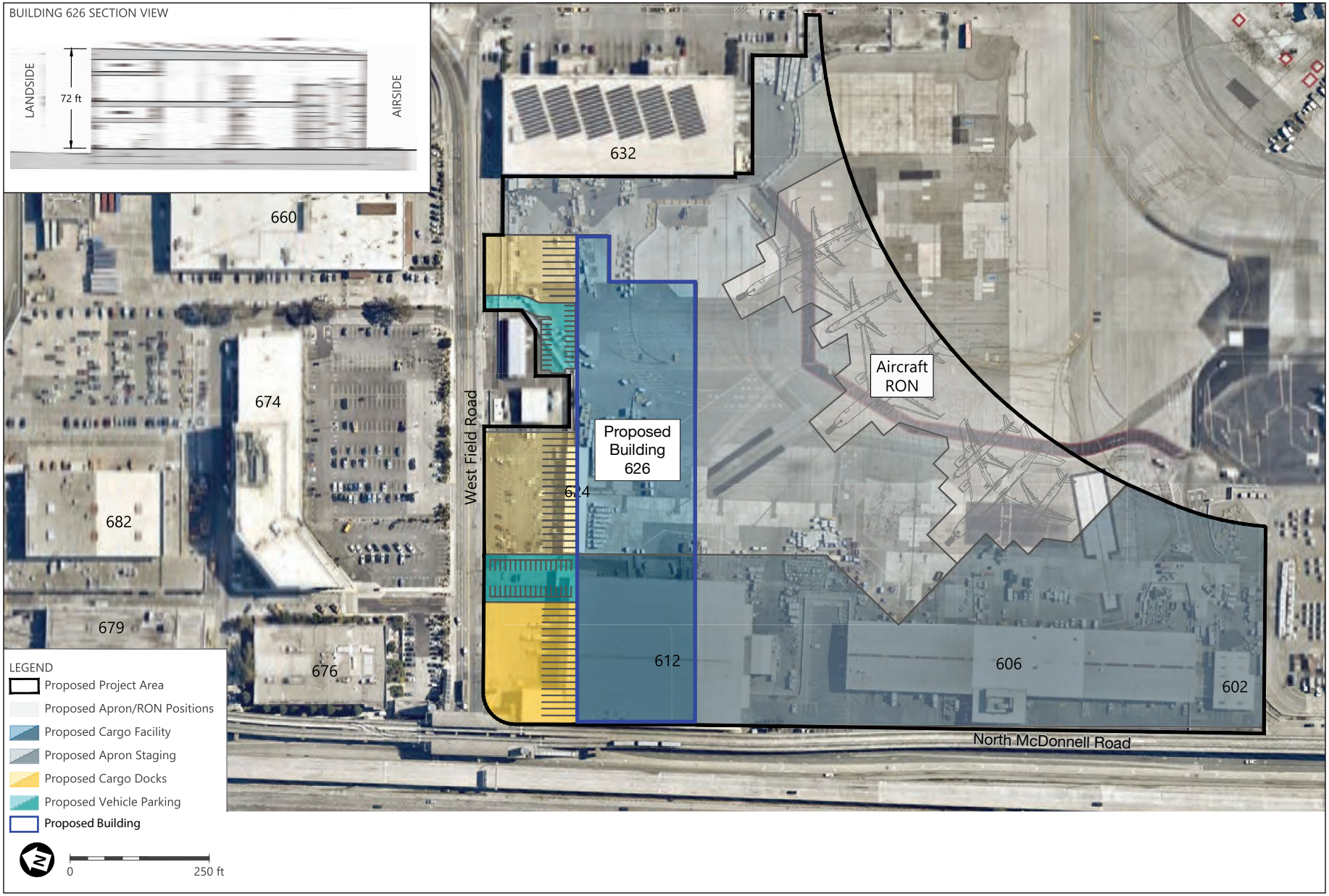
## Building 626

The four buildings proposed to be demolished in order to construct the new Building 626 include:

- Building 602 – 6,575-square-foot building is in fair condition and currently used for GSE maintenance and storage; current airside uses include GSE staging and remain overnight aircraft parking;
- Building 606 – 82,500-square-foot building is in poor condition, and partially used for limited cargo, SFO central receiving/warehouse; current airside uses include GSE operations/staging and remain overnight aircraft parking;
- Building 612 – 114,550-square-foot building is in poor condition, currently used for cargo operations; current airside uses include GSE operations/staging and remain overnight aircraft parking;
- Building 624 – 8,125-square-foot building is in fair condition and currently being used for Airport facilities maintenance equipment storage; current airside uses include GSE operations/staging.

As depicted on **Figure 2**, Building 626 would be a two-level, 72-foot-tall,[7] 391,900-square-foot building. This consolidated facility would continue to accommodate cargo and GSE operations, and associated tenant office space and warehouse. Building 626 would be constructed in two phases south of West Field Road and east of North McDonnell Road in place of existing Buildings 612 and 624, and airside apron staging would be constructed in place of Buildings 602 and 606. As summarized in Table 2, this facility would also include 52 vehicle parking spaces and 45 cargo docks on the north side of Building 626, adjacent to West Field Road. The new facility would also include 585,000 square feet of airside GSE operations and staging areas.

[7] All heights reported in this addendum are above ground level.




SOURCE: SFO Bureau of Planning and Environmental Affairs, September 2020.

West Field Cargo Redevelopment; Case No. 2020-008656ENV

**FIGURE 2**
**PROPOSED BUILDING 626**

## Building 720

The three buildings proposed to be demolished in order to construct the new Building 720 include:

- Building 710 – 123,350-square-foot facility is in fair condition and includes office space, an aircraft hangar, maintenance equipment storage, and remain overnight aircraft parking apron;
- Building 730 – 42,675-square-foot facility is in fair condition and contains office and belly cargo uses; and
- Building 750 – 7,200-square-foot building is in good condition and contains equipment and vehicle storage.

As depicted on **Figure 3**, Building 720 would be a two-level, 72-foot-tall, 306,600-square-foot mixed-use building accommodating both cargo and GSE operations. The building would be accessible from West Area Drive, and would be constructed in two phases south of West Area Drive and east of North McDonnell Road. Due to airspace height restrictions, the northern section of Building 720 would be one level at a height of 36 feet and constructed on the site of the existing Buildings 730 and 750. The southern portion of Building 720 outside of critical airspace surfaces, would be two levels at a height of 72 feet, and constructed on the site of the existing Building 710.

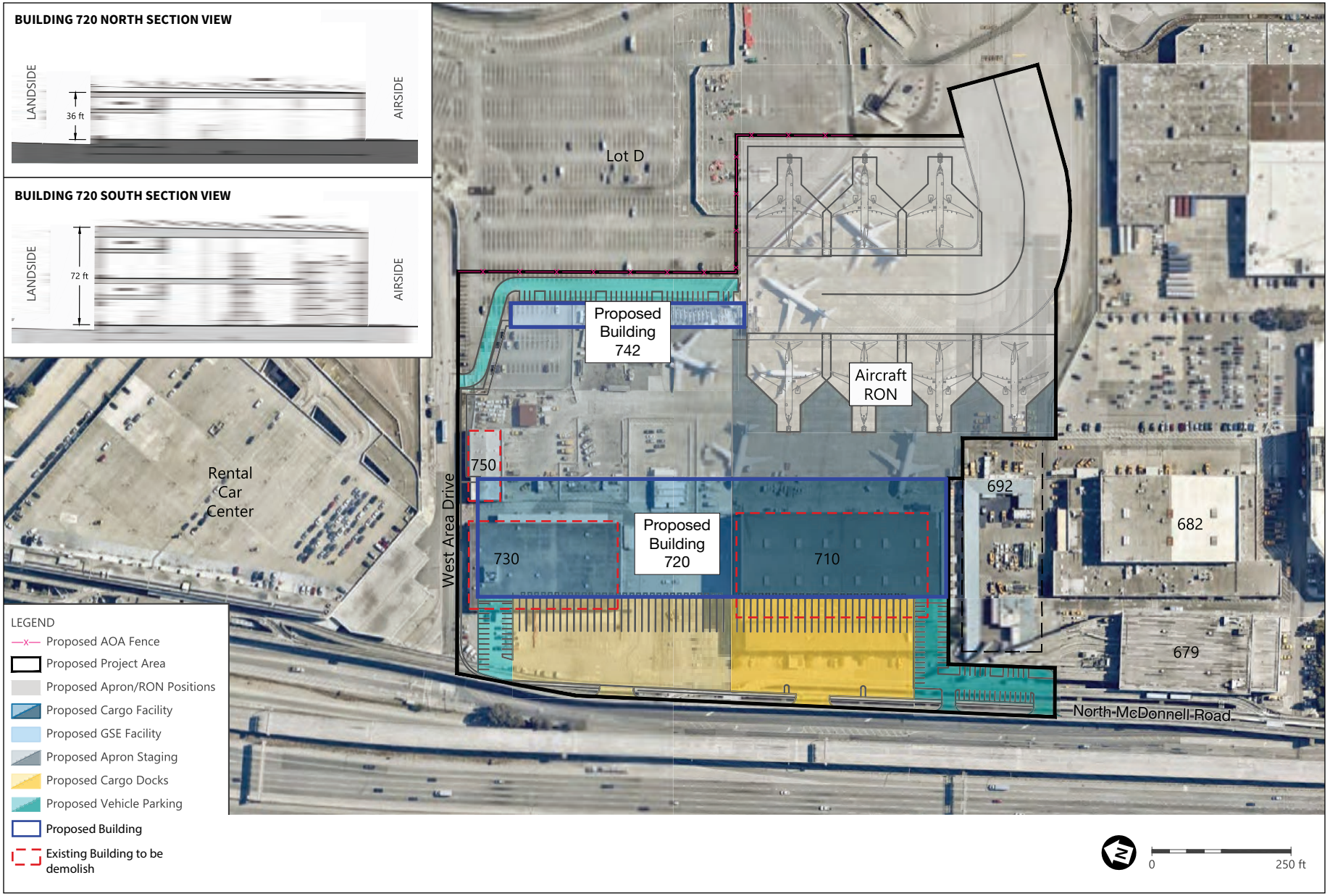
In total, Building 720 would provide about 69,300 square feet of office space and 237,300 square feet of cargo operations space. This facility would include 77 parking spaces and 55 cargo docks along North McDonnell Road. In addition, the areas adjacent to Buildings 710, 730, and 750 (440,000 square feet) that is currently used as public parking lot, remain overnight aircraft parking, and SFO equipment/vehicle storage, would be repaved and converted to secure airside area to expand existing remain overnight aircraft parking and GSE operations areas. The existing aircraft operations area perimeter security fence would be realigned to demarcate secure and nonsecure operations areas.

## Building 742

As depicted on Figure 3, Building 742 would be a one-level, 33-foot-tall, 7,400-square-foot GSE facility, sited outside of the runway protection zone. The building would be constructed east of the proposed Building 720 on an existing surface vehicle parking lot and nonsecure public areas would be accessible via West Area Drive to the north. Building 742 would replace the function of the existing Building 750, and would be utilized as GSE storage and maintenance facility. Approximately 206 public and tenant parking stalls at Lot D would be converted to a 26,000-square-foot staging and operations area for GSE on the airside. This facility would include 34 vehicle parking spaces on the east side of the building.

## Construction Schedule

Each building would consist of a streel-frame structure constructed on a concrete slab foundation supported by reinforced concrete piles that would be predrilled, cast in place, and then capped. The concrete piles would be drilled to a depth of up to 120 feet, and each building's foundation would require excavation of up to 5 feet depth. Construction of the modified project would occur from 2022 to 2029. As shown on Figure 1, construction staging would occur in the North Field, accessible via North Access Road. **Table 3** provides an overview of the modified project construction schedule.




SOURCE: SFO Bureau of Planning and Environmental Affairs, September 2020.

West Field Cargo Redevelopment; Case No. 2020-008656ENV

**FIGURE 3**

**PROPOSED BUILDING 720 AND BUILDING 742**

**Table 3 Modified Project Construction Schedule**

| Component | 2022 | | 2023 | | 2024 | | 2025 | | 2026 | | 2027 | | 2028 | | 2029 | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Demolish B624 | | ■ | | | | | | | | | | | | | | |
| Demolish B612 | | | | | | | | | | | | ■ | | | | |
| Construct B626 | | | ■ | ■ | ■ | ■ | | | | | | | ■ | ■ | ■ | ■ |
| Demolish B730 and B750 | | ■ | | | | | | | | | | | | | | |
| Demolish B710 | | | | | | | ■ | | | | | | | | | |
| Construct B720 | | | ■ | ■ | ■ | ■ | | ■ | ■ | ■ | ■ | | | | | |
| Construct B742 | | | | | | ■ | ■ | | | | | | | | | |
| Demolish B602 and B606 | | | | | | | ■ | | | | | | | | | |

SOURCE: San Francisco International Airport, Bureau of Planning and Environmental Affairs, September 2020.

## 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 PERMITS

- Federal Aviation Administration (FAA). As a federally obligated public use airport, SFO shall coordinate with the FAA for environmental review per FAA Order 1050.1F, Environmental Impacts: Policies and Procedures.
- FAA, Air Traffic Division, Form 7460-1 Permit. Approval of Form 7460-1, Notice of Proposed Construction or Alteration, to construct on an airport.

### LOCAL APPROVALS AND PERMITS

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

## Project Setting

As shown in Figure 1, p. 5, the modified project site is currently paved and developed with the seven existing cargo and GSE facilities described above, as well as adjacent airside staging and remain overnight aircraft parking aprons east of North McDonnell Road and approximately 150 feet east of U.S. 101. The modified project site includes two noncontiguous project areas: one for Building 626, and one for Buildings 720 and

742. The Buildings 720 and 742 project area is south of West Area Drive and the Building 626 project area is south of West Field Road.

The project area for Buildings 720 and 742 is south of West Area Drive and Building 780, a five-story, 66-foot-tall Rental Car Center, and north of Building 692, a one-story vehicle maintenance and sheet metal fabrication facility. The Building 626 project area is south of West Field Road and a surface parking lot adjacent to the four-story, 69-foot-tall Building 674 (airport administration building) and the one-story, 33-foot-tall Building 676 (design and construction building). The closest school is Belle Air Elementary School in San Bruno, located approximately 1,100 feet northwest of the modified project site. The closest residential uses are located on Seventh Avenue in San Bruno, approximately 0.3 mile northwest of the modified project site.

## Cumulative Development

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

**Table 4** presents a list of cumulative Airport projects that could potentially combine with the modified project to result in cumulative impacts.

**Table 4 Past, Present, and Reasonably Foreseeable Future Actions on SFO Property**

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

SOURCE: SFO Five-Year Capital Plan, 2019.

# CEQA Analysis Approach

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

This addendum evaluates whether the potential environmental impacts of the modified project are addressed in the Master Plan FEIR, which was certified on May 29, 1992.[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

### 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.

[8] San Francisco Planning Department, *San Francisco International Airport Master Plan Final Environmental Impact Report*, Case No. 1986.638E, State Clearinghouse No. 90030535, May 1992.

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.[9]

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

## MODIFIED PROJECT IMPACTS

### *HISTORIC ARCHITECTURAL RESOURCES*

The following seven age-eligible (i.e., 45 years or older) buildings are located within the modified project site: Buildings 602, 606, 612, 624, 710, 730, and 750.

Buildings 710 and 750 were evaluated in 2018 for eligibility for listing in the California Register of Historical Resources (California register) as part of the Recommended Airport Development Plan.[11] Building 710 was constructed in 1968 on the east side of North McDonnell Road as the hangar and offices for Western Airlines, and it has since been occupied by several other airlines, Airport concessionaires, and the SFO Airport Commission. It measures 123,400 square feet and contains three stories of office space. Building 750 was constructed in ca. 1966-69 on the south side of West Area Drive and was used as a support facility for Delta Air Lines for several decades. Neither building was found to be individually significant under any California register criteria or to contribute to any known or potential historic districts on the Airport property. The planning department concurred with the findings of the 2018 evaluation and determined that Buildings 710 and 750 are not considered historical resources for the purposes of CEQA.[12]

The other five age-eligible buildings—Buildings 602, 606, 612, 624, and 730—were evaluated in 2020 for eligibility for listing in the national register as part of the West Field Cargo Redevelopment Project.[13] The 2020 evaluation found that none of these five age-eligible buildings are individually significant under any

[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.

[10] Ibid.

[11] ESA, *Historic Resources Evaluation Part 1 for the Recommended Airport Development Plan*, San Francisco International Airport, prepared for the San Francisco International Airport, June 2018.

[12] San Francisco Planning Department, *Preservation Team Review Form for Various Properties at San Francisco International Airport (Case No. 2017-007468ENV)*, June 25, 2018.

[13] ESA, *Cultural Resources Report for the West Field Cargo Redevelopment Project,* prepared for the Federal Aviation Administration and San Francisco International Airport, September 2020.

national register criteria, nor do they contribute to any known or potential historic districts on the Airport property.[14] The planning department determined that it concurs with the findings of the 2020 evaluation and that Buildings 602, 606, 612, 624, and 730 are not considered historical resources for the purposes of CEQA.[15]

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

### *ARCHEOLOGICAL RESOURCES*

ESA conducted a records search for the project site and all areas within 0.5 miles of the modified project site at the Northwest Information Center (NWIC) of the California Historical Resources Information System at Sonoma State University in Rohnert Park, California on June 4, 2019 (NWIC File No. 18-2340), which was updated on July 23, 2020 (NWIC File No. 20-01062). The records search included review of previous studies, records, and maps on file at the NWIC, including a review of the State of California Office of Historic Preservation Built Environment Resource Directory and Archeological Determinations of Eligibility with summary information from the National Register, Registered California State Landmarks, California Historic Points of Interest, and California Register 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 unrecorded archeological resources within the project site. Four prehistoric and historic-era archeological resources have been recorded between 0.3 and 0.5 miles from the project site.

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

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

In the 19th and early 20th centuries, piers and elevated roadways were built across the marshes in some areas to provide access to the bay for fishing or shipping. Later, dry lands were created through the construction of

[14] Ibid.

[15] EP has acknowledged that it concurs with the findings in the Section 106 report and will issue a project determination before publication of this addendum. Audrey Park (SFO), email to Elliott Schwimmer (ESA), December 11, 2020.

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 project site has been found, and it is not anticipated that the remains of such features would be encountered at the modified project site.

Based on its environmental history, it appears that the modified project site was not suitable for prehistoric occupation during the past 2000 years. However, this location at one time was adjacent to the bay shore and not far distant from creeks that entered the bay, a setting that was highly favored by prehistoric Native Americans. More than 400 prehistoric shell middens—sites of substantial prehistoric Native American occupation—were visible on the surface around San Francisco Bay in 1904.[16] On this basis, the shoreline setting is assumed also to be sensitive for the presence of older shoreline prehistoric archeological sites, occupied and used during the time that the bay was filling and subsequently inundated and buried by bay bottom and (later) marsh silt deposits (known locally as Young Bay Mud). If present, archeological resources that were present at this time would most likely be found beneath the Young Bay Mud, at or near the surface of the underlying Upper Layered Sediments stratum that predate that bay in this area.

As revealed in geotechnical cores, and discussed in more detail below, the geologic stratigraphy at the 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[17] (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.[18] While in some areas the surface of the Upper Layered Sediments stratum was eroded away by the tidal action of the rising bay, under some environmental conditions the upper surface of these sediments has been preserved intact beneath the Young Bay Mud. In these circumstances, there is the potential for the presence of Middle Holocene archeological deposits. These would be expected to be located beneath the Young Bay Mud, in the upper 3 to 5 feet of the Upper Layered Sediments.

Based on the geotechnical investigations, the modified project site consists of approximately 2 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 9 to 24.5 feet below ground surface (bgs). The Young Bay Mud, deposited in an aquatic environment,[19] has low sensitivity for prehistoric archeological resources, with the possible exception of rare, isolated prehistoric human remains. Below the Young Bay Mud, the Upper Layered Sediments and underlying Old Bay Clay extend to a depth of approximately 144 feet bgs. As discussed above, the Upper Layered Sediments stratum may represent the land surface at the project site during the terminal Pleistocene, which potentially was habitable in the late Pleistocene to early Holocene, the time at which humans are believed to have first arrived in the Bay Area. For this reason, the interface between Young Bay Mud and the Upper Layered Sediments is potentially sensitive for containing buried prehistoric archeological deposits. Such deposits, if present in this context, are highly significant

[16] N.C. Nelson, *Shellmounds of the San Francisco Bay Region*, University of California Publications in American Archaeology and Ethnology, 1909.

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

[18] Ibid.

[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.

archeologically because only a few such resources have been found, and because they likely represent the earliest human occupation of the region.

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

Nineteen geotechnical cores were extracted from the project site or immediate vicinity. The project geoarcheologist noted that several of the core logs describe the upper surface of the Upper Layered Sediments as greenish grey silty clays and sandy silts, which are indicative of an aquatic environment.[20,21,22,23] However, not all of the cores, which for geotechnical purposes are not sampled continuously, included samples at the Young Bay Mud/ Upper Layered Sediments interface, so did not provide definitive data on the depositional environment of the upper stratum of the Upper Layered Sediments. Geoarcheological analysis also included review of a geotechnical study of a larger area of the airport, conducted in 2000, which concludes that there is evidence for widespread erosion of the Upper Layered Sediments in the general project vicinity based on substantial irregularities in the depths and thicknesses of various strata. These variations suggest that the Upper Layered Sediments stratum has been cut by deep erosion channels at various locations around the airport. This pattern of erosion may have reduced the potential for survival of potentially habitable pre-Bay land surfaces within the modified project site.

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

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

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

[22] 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.

[23] SFDPW Bureau of Engineering, *Geotechnical Report, West Field Cargo Area, Phase 1A and 1B, At Intersection of West Field Road and McDonnell Road, San Francisco International Airport, San Francisco, California*. Prepared for San Francisco International Airport, 2005.

sensitive for the presence of submerged prehistoric archeological resources. Any project impacts to such a resource would be significant.

Direct project excavations at the project site would disturb soils to 5 feet depth. At these depths, excavations would be confined to fill and Young Bay Mud strata. These strata are not archeologically sensitive (with the possible exception of potential isolated human remains), so mass excavations would not be expected to result in impacts to archeological resources. However, Buildings 626, 720, and 742 would require pile foundations up to 120 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 prehistoric deposit were present at the project site near the surface of the Upper Layered Sediments.

The FEIR concluded that while there are no known archeological resources at the Airport, the possibility exists for the presence of buried archeological resources—including those that contain human remains. Consistent with the initial stipulation of FEIR Mitigation Measure 1.D.1.a.[24] 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 prehistoric archeological resources. For this reason, while this potential is uncertain, if a buried prehistoric deposit were present it would be highly significant. Therefore, based on the project archeologist's recommendation and consultation with the ERO, and consistent with archeological treatments applied for San Francisco projects in similar settings, **Mitigation Measure CR-1**, **Archeological Testing**, is included in the project. In accordance with this measure, geoarcheological testing would be undertaken at the project site prior to pile construction to more definitively ascertain whether significant prehistoric deposits or paleosols that may harbor such deposits are present and would be affected by pile construction.

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

> **Mitigation Measure CR-1: Archeological Testing** (Implementing FEIR Mitigation Measure 1.D.1.a through I.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

[24] 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.

significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of a qualified archeological consultant having expertise in California prehistoric and urban historical archeology. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c).

*Archeological Testing Program.* The archeological testing program shall be conducted in accordance with the approved Archeological Testing Plan (ATP). The purpose of the archeological testing program will be to determine to the extent possible the presence or absence of archeological resources and to identify and to evaluate whether any archeological resource encountered on the site constitutes an historical resource under CEQA.

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

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

The scope of the ADRP shall include the following elements:

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

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

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

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

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

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

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

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

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

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

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

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

There also is the potential for accidental discovery of archeological resources during project construction; in particular, isolate human remains. Implementation of **Mitigation Measure CR-2**, **Accidental Discovery**, would reduce the potential for the project to result in significant impacts to unanticipated archeological resources and to human remains, as defined in CEQA section 15064.5, consistent with the conclusion of the FEIR. Mitigation Measure CR-1 reflects updates to the mitigation measure consistent with current planning department practices, and supersedes FEIR **Mitigation Measures I.D.1.a through I.D.1.d**.[25]

> **Mitigation Measure CR-2: Accidental Discovery** *(Implementing FEIR Mitigation Measures I.D.1.a through I.D.1.d)*. The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in CEQA Guidelines Section 15064.5(a) and (c).
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> *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.
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> *Discovery Stop Work and Notification.* Should any indication of an archeological resource be encountered during any soils-disturbing activity of the project, the project Head Foreman and/or project sponsor shall immediately notify the ERO and shall immediately suspend any soils-disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures should be undertaken.
>
> *Archaeological Consultant Identification and Evaluation.* If the ERO determines that an archeological resource may be present within the project site, the project sponsor shall retain the services of an archeological consultant from the Qualified Archeological Consultant List maintained by the Planning Department. The archeological consultant shall advise the ERO as to whether the discovery is an archeological resource as well as if it retains sufficient integrity and is of potential scientific/historical/cultural significance. If an archeological resource is present, the archeological consultant shall identify, document, and evaluate the archeological resource. The archeological consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by the project sponsor.
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> *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

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

program is required, it shall be consistent with the Environmental Planning Division guidelines for such programs and shall be implemented immediately. The ERO may also require that the project sponsor immediately implement a site security program if the archeological resource is at risk from vandalism, looting, or other damaging actions.

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

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

The scope of the ADRP shall include the following elements:

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

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

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

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

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

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

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

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

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

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

### CUMULATIVE IMPACTS

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

Generally, the area for cumulative analysis of archeological resources is the project site where excavation would occur. None of the cumulative projects noted in Table 4, p. 11, would overlap with construction activities at the project site, nor are there any known archeological resources on the modified project site that extent 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 M-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 cumulative projects in the project vicinity to result in a significant cumulative impact on archaeological resources or human remains.

## Tribal Cultural Resources

### FEIR FINDINGS

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

### MODIFIED PROJECT IMPACTS

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

project site. Consistent with prior consultation between the City and Ohlone tribal groups, all prehistoric sites identified would be considered to be potential tribal cultural resources.

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

### CUMULATIVE IMPACTS

The FEIR did not make an impact determination specific to cumulative tribal cultural resource effects. The geographic extent of cumulative tribal cultural resources impacts is typically the project site, where excavation would occur. None of the cumulative projects noted in Table 4, p. 11, would overlap with activities at the project site. Therefore, with implementation of Mitigation Measure CR-1 and Mitigation Measure CR-2, impacts from the modified project could not combine with other cumulative projects in the project vicinity to result in a significant cumulative impact on tribal cultural resources.

## Transportation and Circulation

### MASTER PLAN FEIR FINDINGS

Transportation and circulation impacts of Master Plan projects were analyzed on pp. 125 to 152 and pp. 265 to 330 of the Master Plan FEIR. The Master Plan FEIR determined that several transportation and circulation impacts related to intersection, freeway ramp, and freeway mainline segment operations were potentially significant, but would be reduced to a less-than-significant level with implementation of the 11 mitigation measures identified in the Master Plan FEIR. The 11 transportation and circulation mitigation measures were designed to address the potential impacts through a variety of mechanisms that take a comprehensive, systemwide 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.[26]

### MODIFIED PROJECT TRAVEL DEMAND METHODOLOGY AND RESULTS

The modified project would not affect the level of air traffic and thus would have no effect on passenger travel to and from the Airport. The modified project would replace the current cargo/maintenance facilities and the size of the new 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 2, p. 6, based on the cargo space analyzed in the Master Plan FEIR and subsequent new construction and demolition of cargo facilities, approximately 837,380 square feet of cargo space remains unbuilt. With implementation of the modified project, approximately 506,955 square feet of unbuilt cargo space would remain under what was analyzed in 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.

[26] 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*

As shown in Table 3, p. 10, demolition of the seven existing buildings and construction of the three new buildings on the project site would occur between 2022 and 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, West Field Road, and West Area Drive would be used to access the project site. Throughout construction of the modified project there would be additional construction trucks on these roadways, two of which (North McDonnell Road and West Field Road) are designated bicycle routes; however, bicycle lanes and/or shared-lane striping are provided, and construction trucks would not substantially affect bicycle travel, except when entering the site. 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).[27] 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 Airport Bureau's 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 by SFO Traffic Engineering for any road or lane closures. With implementation of a Traffic and Pedestrian Detour Routing Plan, construction trucks would not substantially affect pedestrians or bicyclists. Moreover, construction staging and delivery activities would occur on-site; materials and equipment would not be staged on sidewalks.

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

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

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

## *OPERATION*

### POTENTIALLY HAZARDOUS CONDITIONS

SamTrans would continue to provide service to the existing bus stop on the south side of the North McDonnell Road/West Area Drive 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 FEIR, would not result in more severe impacts than those identified in the FEIR, and would not require new mitigation measures.

### GENERAL ACCESSIBILITY AND EMERGENCY ACCESS

As discussed above, pedestrian and bicycle access would continue to be provided on sidewalks and streets adjacent to the project site with implementation of the modified project. 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 Master Plan FEIR did not identify impacts on pedestrians or bicyclists and the Master Plan 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[28] (Transportation Impact Analysis Guidelines) set forth a screening criterion for projects that would typically not result in significant effects related to public transit delay. As discussed above, the modified project would not cause an increase in travel demand as compared to the Master Plan FEIR, and therefore would not result in additional vehicle trips that could cause delay to transit vehicles operating near the modified project site. Based on this determination, the modified project would generate fewer than 300 vehicle trips during the p.m. peak hour, which is the screening criterion for transit delay. Therefore, the modified project meets the screening criterion, and impacts on transit delay and operations would be less than significant.

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

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

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 Master Plan FEIR, and would not require new mitigation measures.

### VEHICLE MILES TRAVELED ASSESSMENT

As discussed above, the modified project would not cause an increase in travel demand as compared to the Master Plan FEIR, and therefore would not result in additional vehicle miles traveled (VMT). Furthermore, the project site meets the Transportation Impact Analysis Guidelines' proximity to transit stations screening criterion due to its location less than a half-mile from the BART San Francisco International Airport Station, a major transit stop.[29,30] In addition to BART, the project site is directly served by the AirTrain and SamTrans 140, 292, 397, and 398 bus routes. As such, the modified project would not result in a substantial increase in VMT.

The modified project would include features that would alter the transportation network. These features include reconstructed sidewalks and new or relocated driveways. These types of transportation network alterations qualify as "active transportation, rightsizing (aka Road Diet) and Transit Project", or "other minor transportation project" as defined in the Transportation Impact Analysis Guidelines for Environmental Review.[31] 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.

### LOADING

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

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[29] The screening criteria in Attachment A – Screening Criteria (SB 743 Checklist) of Appendix L of the Transportation Impact Analysis Guidelines can be applied to a project to determine whether a detailed VMT analysis is required. The modified project meets the Transportation Impact Analysis Guidelines' definition of a small project, 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.

[30] San Francisco Planning Department, Transportation Impact Analysis Guidelines, Appendix L Vehicle Miles Traveled (VMT)/Induced Automobile Travel, February 14, 2019, last updated October 2019, *https://citypln-m-extnl.sfgov.org/SharedLinks.aspx?accesskey=d7846dda8f994e3e1e72b28eb245c5834c80aab64f63a21eab9a41f82b4af63e&VaultGUID=A4A7DACD-B0DC-4322-BD29-F6F07103C6E0*, accessed May 10, 2021.

[31] Ibid.

PARKING

As shown in Table 2, p. 6, the modified project would remove 690 existing vehicle parking spaces and include a total of 163 new parking spaces spread across the three newly constructed buildings.[32] Therefore, the modified project would result in a net decrease of 527 spaces, as compared to existing conditions. The Master Plan FEIR analyzed a net increase of 7,340 parking spaces. Because the modified project would not result in an increase in the number of employees, the reduced parking supply 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 itself, does not result in a significant impact on the environment.[33] Secondary effects related to safety or accessibility for pedestrians, bicycling, or driving; emergency access; and delays to public transit, would not occur due to the fact that parking would be for Airport employees only, and any vehicles that could not be accommodated within the designated parking areas would drive to other nearby Airport parking facilities. Furthermore, the project site is accessible by other travel modes (e.g., BART, AirTrain, SamTrans) that could be used by employees as an alternative to driving and parking if parking availability was in question. As such, the modified project would not result in new significant impacts that were not previously identified in the Master Plan FEIR, would not result in more severe impacts than those identified in the FEIR, and would not require new mitigation measures.

### CUMULATIVE IMPACTS

The cumulative context for transportation and circulation effects is typically localized, in the immediate vicinity of the project site or at the neighborhood level. While the current context of cumulative projects has changed from that analyzed in the Master Plan FEIR (Table 2, p. 6), 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 replace the current cargo/maintenance facilities and the size of the new cargo and related support facilities would be within the parameters of—and consistent with—the cargo facilities analyzed as part of the Master Plan FEIR. For this reason, the modified project would not cause an increase in travel demand as compared to the Master Plan FEIR, and therefore would not result in any new or increased severity of transportation impacts identified in the FEIR. As such, the modified project would not combine with other projects in the vicinity to result in a significant cumulative impact; therefore, no further analysis is necessary.

## Noise

### MASTER PLAN FEIR FINDINGS

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

The FEIR determined that pile driving, if needed during construction activities, would affect nearby residential areas located west of the Airport. The Master Plan FEIR concluded (p. 435) that construction-

[32] Building 626 would provide 52 vehicle parking spaces, Building 720 would provide 77 parking spaces, and Building 742 would provide 34 vehicle parking spaces.

[33] San Francisco Planning Department, Transportation Impact Analysis Guidelines: Appendix O Vehicular Parking, February 14, 2019, last updated in October 2019. *https://citypln-m-extnl.sfgov.org/SharedLinks.aspx?accesskey=390b966d723bebf03c21430a90536cbc2ee9439449e21c03af89661d254061a4&VaultGUID=A4A7DACD-B0DC-4322-BD29-F6F07103C6E0*, accessed March 31, 2021.

related 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.[34] 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. To the extent that construction noise mitigation measures specified in the MMRP might not avoid or substantially lessen the impacts of Master Plan projects, the Airport Commission made the finding that the environmental, economic, and social benefits of the Master Plan would override the remaining impacts related to construction noise, as stated fully in the Airport Commissions adoption of the Statement of Overriding Considerations.[35]

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 two decibels higher than existing ambient noise levels on the roads. The FEIR concluded that 2 decibel noise level increase would not be perceptible to people, and thus would not exceed the applicable threshold of an increase of 5 dBA. Therefore, the FEIR determined that operational ground-level vehicle traffic would be less than significant.

## MODIFIED PROJECT IMPACTS

### *CONSTRUCTION NOISE AND VIBRATION*

Construction activities associated with the modified project that would have the potential to result in changes to the existing noise environment include building demolition, grading, excavating, compacting soil, construction truck and worker traffic, and other activities associated with construction of this type. Heavy construction equipment including drill rigs, compaction equipment, and dump trucks may cause temporary increases in vibration levels near the modified project site.

The nearest sensitive receptors to the project site are the Belle Air Elementary School at 450 Third Avenue in San Bruno (approximately 1,100 feet west of the modified project site and U.S. 101) and single-family residences at 7th Avenue in San Bruno (approximately 1,000 feet west of the project site and U.S. 101).

The duration of construction for the modified project would be conducted in phases over a period of 7 years; however, pile driving activities are not anticipated to be required for the modified project because the reinforced concrete piles would be predrilled, cast in place, and then capped. Other construction activities associated with the modified project, including demolition, grading, excavating, compacting soil, and comparable activities, would be similar to those described in the Master Plan FEIR. Heavy construction equipment, including excavators, construction cranes, and dump trucks, may cause temporary increases in vibration levels near the project site. Due to the types of land uses in the area immediately surrounding the modified project site and the approximately 1,000-foot distance to the nearest sensitive receptors (the single-family residences on 7th Avenue), construction noise would not have a substantial impact on or near the site or on any sensitive receptors. Implementation of the modified project would not result in any substantially greater impacts beyond those identified in the Master Plan FEIR.

Nevertheless, the modified project would implement the following Master Plan FEIR mitigation measures: **Mitigation Measure I.C.1.a**, **Noise Reduction Measures**; **Mitigation Measure I.C.1.b**, **Predrilling Holes**; and **Mitigation Measure I.C.1.d**, **Construction Barriers**, as well as the ASCM regarding noise reduction

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

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

strategies during construction (Division 01 57 00).[36] 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 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.

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

As shown in **Table 5**, construction vibration levels could reach as high as approximately 0.21 inch-per-second peak particle velocity[37] 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 construction of Building 626, which would occur approximately 45 feet from Building 620, a telecommunications facility. These vibration levels would be below the building damage thresholds (0.5 peak particle velocity) for the nearest 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 5 Vibration Source Levels for Construction Equipment**

| Equipment | Approximate Peak Particle Velocity (in/sec) 25 Feet |
|---|---|
| Vibratory Compactor | 0.21 |
| Caisson Drill and Hoe Ram | 0.089 |
| Loaded Trucks | 0.076 |
| Jackhammer | 0.035 |

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

### *TRAFFIC-GENERATED NOISE*

As noted above under the "Modified Project Description," the modified project would not generate new employees, as tenants in the existing buildings that are proposed for demolition would be relocated to the new facilities; therefore, the modified project would not generate additional vehicle trips beyond what was analyzed in the FEIR. As such, there would be no incremental increase in traffic that could result in a measurable difference in traffic noise, and the modified project would not result in new significant impacts

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

[37] Peak particle velocity is the instantaneous maximum velocity reached by a vibrating element as it oscillates. This concept indicates the perceptibility and risk of damage to structures due to vibration. It is commonly measured in inches per second.

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 would be comparable to that identified in the Master Plan FEIR since the modified project includes the same types of cargo buildings analyzed in the FEIR. Twenty four-hour operation of the proposed 100 new cargo docks would generate noise from truck maneuvering and operation of transportation refrigeration units. However, as summarized in Table 1, p. 4, the modified project would be within the parameters of—and consistent with—the cargo facilities analyzed as part of the Master Plan FEIR. Given the 1,000-foot distance west of the airport and U.S. 101 to the nearest sensitive receptors, operational noise from the cargo docks also would be substantially reduced at these receptors. The modified project would have no effect on air travel and thus would not result in any changes in aircraft noise as compared to the analysis in the Master Plan FEIR.

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

### CUMULATIVE IMPACTS

With the exception of the Shoreline Protection Program, the other cumulative projects identified in Table 2, p. 6, would include drilling and cast-in-place pile installation techniques that would avoid noise impacts associated with impact or vibratory pile driving and only result in noise from standard construction equipment such as from excavators, rollers, hoe rams, bulldozers, drill rigs, cranes, forklifts and jackhammers. Where pile driving or vibratory pile driving would occur as part of the Shoreline Protection Program, these areas are over 4,000 feet from the modified project site. At this distance, noise from impact pile driving would be reduced to 56 dBA, which is well below the existing noise level at the modified project site. The distance of these other cumulative projects from the proposed 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 1992 Master Plan FEIR. The Master Plan FEIR determined construction related air quality impacts would be less than significant and operations related air quality impacts would be significant and unavoidable with respect to hydrocarbons (HC), nitrogen oxides (NOx), carbon monoxide (CO), sulfur oxides (SOx), and coarse particulate matter ($PM_{10}$) emissions. 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 detailed in the Regulatory section below. The Master Plan FEIR did not analyze potential health risk or odor impacts associated with construction or operation of the Master Plan projects. The Master Plan FEIR combined all Master Plan

projects in its air quality analysis and did not disclose air quality impacts for individual projects or land use types. Therefore, the Master Plan FEIR includes 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 ($\mu g/m^3$) during construction. With implementation of Mitigation Measure I.B.1.a, Construction Period Activities (includes implementation of construction period measures to reduce emissions of particulates and other pollutants), the Master Plan FEIR concluded impacts from construction emissions of $PM_{10}$ would be reduced to less than significant. The Master Plan FEIR stated that hydrocarbons would be emitted from paving activities and other criteria pollutants would be emitted from construction vehicles and equipment. Impacts associated with 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 6** shows the operational emissions as disclosed in the Master Plan FEIR. As shown in the table, emissions of HC, NOx, CO, SOx and $PM_{10}$ were expected to exceed applicable thresholds. The Master Plan FEIR found that with implementation of Mitigation Measures I.A.1.a, Fund and Implement a Transportation System Management; I.B.1.b, Manage Aircraft Operating Procedures; and l.B.1.c, Adopt the Transportation System Management Program,[38] operational emissions from the Master Plan would be reduced, but not to less-than-significant levels.

**Table 6 Master Plan FEIR – Total Daily Operational Air Pollutant Emissions**

| | HC | NOx | CO | SOx | $PM_{10}$ | ROG & $PM_{2.5}$[a] |
|---|---|---|---|---|---|---|
| | Pounds per Day | | | | | |
| 1996 | 3,800 | 4,000 | 17,600 | 0 | 1,200 | NA |
| 2006 | 11,000 | 8,400 | 48,600 | 200 | 3,400 | NA |
| *Threshold* | *150* | *150* | *550* | *150* | *150* | *NA* |
| Exceed Threshold | **Yes** | **Yes** | **Yes** | **Yes** | **Yes** | NA |

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

NOTE:

[a] ROG and $PM_{2.5}$ were not considered during preparation of the 1992 Master Plan FEIR.

## REGULATORY CONTEXT

The Bay Area Air Quality Management District is the regional air quality management agency with jurisdiction over the nine-county San Francisco Bay Area Air Basin (SFBAAB), which includes San Francisco, Alameda, Contra Costa, Marin, San Mateo, Santa Clara, and Napa Counties, as well as portions of Sonoma and Solano Counties. The BAAQMD 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

[38] Exhibit B to Findings, Mitigation Monitoring Program. San Francisco International Airport Master Plan Mitigation Measures.

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 United States Environmental Protection Agency had yet to consider $PM_{2.5}$ separate from $PM_{10}$.[39] Since that time, both have been added as pollutants of concern. As noted above, the Master Plan FEIR did not discuss potential health risk or odor impacts related to construction or operational activities of the Master Plan; however, both health risk and odor impacts are discussed qualitatively in the analysis herein consistent with the CEQA Guidelines.

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

## APPROACH TO ANALYSIS

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

Construction of the modified project would begin in the year 2022 and would be completed by 2029. 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 2022 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 2016.3.2. Construction emissions resulting from on-road vehicle trips were modeled outside of CalEEMod using EMFAC2017 emission factors. An adjustment factor was applied to the EMFAC2017 emission factors account for the Safer Affordable Fuel-Efficient Vehicles Rule Part One (SAFE rule).[40]

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. 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.

[39] Although hydrocarbons (HC) and reactive organic gases (ROG) are not directly interchangeable, their inclusion as pollutants of concern has always been for the sake of their role in ozone formation. Due to changes in regulation over time, ROG emissions are assessed in place of HC emissions for the purposes of this analysis.

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

With respect to criteria pollutants, although hydrocarbons were analyzed in the 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 FEIR, they are currently considered pollutants of concern and are thus analyzed herein.[41]

As discussed above, California Air Resources Board (CARB) has implemented a number of regulations throughout the years to reduce pollutant emissions from mobile sources. These regulations govern the emissions standards, and therefore the emission factors that were used to estimate mobile source emissions for both the Master Plan and the modified project. The regulations have reduced emissions significantly since the early 1990s to the present. EMFAC2017 was used to model mobile emissions which takes into account the emission factors for vehicles based on their model year and the year of operation.[42] In general, emission factors decrease 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.[43]

## MODIFIED PROJECT IMPACTS

### *CONSTRUCTION*

#### CRITERIA AIR POLLUTANTS AND FUGITIVE DUST

Construction equipment is a major source of pollution within the state. CARB has implemented regulations to reduce emissions from off-road construction equipment such as those that would be used for the modified project. In 2014, CARB implemented the Regulation for In-use Off-Road Diesel-Fueled Fleets (Off-Road Regulation) to ensure that older, less efficient equipment fleets are replaced with newer, cleaner fleets. In addition to idling being limited to 5 minutes or less in any one location, CARB regulations require that by January 2019 all fleets must meet average emissions targets or implement best available control technologies to reduce fleet emissions. 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), would reduce the modified project's impact regarding fugitive dust emissions to less than significant, as discussed in further detail below. **Table 7** shows the construction emissions estimated for the modified project compared to the construction emissions estimated for the Master Plan cargo facilities. As shown in Table 7, the modified project would have less daily construction emissions than the cargo facilities component analyzed in the Master Plan FEIR. Therefore, construction of the modified project would not result in any new significant noise 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.

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[41] 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 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.

[42] Since EMFAC2017 (CARB's emissions model for mobile sources) does not provide emission rates for years prior to 2000, on-road construction emissions were modeled using the 2000 model year emission rates instead of the actual construction years (1992 through 1999).

[43] Environmental Science Associates, *SFO West Field Cargo Redevelopment: Air Quality Supporting Information*, May 17, 2021.

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.

**Table 7 Regional Construction Emissions (Unmitigated) (lbs/day)**

| | ROG | NOx | CO | SOx | $PM_{10}$[a] | $PM_{2.5}$[a] |
|---|---|---|---|---|---|---|
| **MAXIMUM DAILY – MASTER PLAN CARGO FACILITIES** | | | | | | |
| 1992 | 50 | 433 | 333 | 17 | 26 | 26 |
| 1993 | 56 | 376 | 150 | 20 | 29 | 29 |
| 1994 | 56 | 376 | 150 | 20 | 29 | 29 |
| 1995 | 56 | 376 | 150 | 20 | 29 | 29 |
| 1996 | 56 | 376 | 150 | 20 | 29 | 29 |
| 1997 | 56 | 376 | 150 | 20 | 29 | 29 |
| 1998 | 56 | 376 | 150 | 20 | 29 | 29 |
| 1999 | 75 | 391 | 160 | 21 | 31 | 31 |
| *Maximum Daily* | *75* | *433* | *333* | *21* | *31* | *31* |
| **MAXIMUM DAILY – MODIFIED PROJECT** | | | | | | |
| 2022 | 16 | 167 | 110 | 1 | 5 | 4 |
| 2023 | 30 | 151 | 138 | <1 | 7 | 6 |
| 2024 | 44 | 284 | 236 | 1 | 9 | 8 |
| 2025 | 21 | 178 | 163 | 1 | 6 | 5 |
| 2026 | 27 | 59 | 65 | <1 | 3 | 2 |
| 2027 | 24 | 139 | 130 | <1 | 4 | 4 |
| 2028 | 13 | 78 | 81 | <1 | 3 | 3 |
| 2029 | 25 | 155 | 138 | <1 | 5 | 4 |
| *Maximum Daily* | *44* | *284* | *236* | *1* | *9* | *8* |
| **Difference** | **(30)** | **(149)** | **(97)** | **(20)** | **(22)** | **(22)** |

SOURCE: ESA 2020.

NOTES:

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

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

## HEALTH RISKS AND 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 no residences, schools, childcare center, or other such sensitive land uses within 1,000 feet of the modified project site (the closes sensitive receptor is Belle Air Elementary School located approximately 1,100 feet west of the modified project site and U.S. 101), 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 1.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 lane 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 offices, warehouses and parking uses would not generate substantial odors of concern.

Given that the modified project is consistent with the land uses analyzed in the Master Plan FEIR, the modified project would not result in any new significant air quality or odor impacts or substantially increase the severity of a significant impact, and no new 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.[44]

The modified project would not exceed the Master Plan FEIR's construction or operational emissions of criteria air pollutants or air pollutant emissions; 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, child care centers, or other such sensitive land uses within 1,000 feet of the modified project site, the modified project would not contribute to a significant cumulative impact related to health risks that was not previously identified in the Master Plan FEIR. The modified project also would not combine with other projects in the vicinity to result in a significant cumulative impact; therefore, no further analysis is necessary.

## Greenhouse Gas Emissions

### *MASTER PLAN FEIR FINDINGS*

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

### *MODIFIED PROJECT IMPACTS*

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

The air district has prepared guidelines and methodologies for analyzing GHGs. These guidelines are consistent with CEQA Guidelines sections 15064.4 and 15183.5, which address the analysis and determination of significant impacts from a proposed project's GHG emissions. CEQA Guidelines section 15064.4 allows lead agencies to rely on a qualitative analysis to describe GHG emissions resulting from a project. CEQA Guidelines section 15183.5 allows for public agencies to analyze and mitigate GHG

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

emissions as part of a larger plan for the reduction of GHGs and describes the required contents of such a plan. Accordingly, San Francisco has prepared Strategies to Address Greenhouse Gas Emissions,[45] which present a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco's qualified GHG reduction strategy in compliance with the CEQA Guidelines. These GHG reduction actions have resulted in a 35 percent reduction in GHG emissions in 2015 compared to 1990 levels,[46] exceeding the year 2020 reduction goals outlined in the air district's 2018 Clean Air Plan, Executive Order (EO) S-3-05, and Assembly Bill (AB) 32 (also known as the Global Warming Solutions Act).[47]

Given that the City has met the state and region's 2020 GHG reduction targets and San Francisco's GHG reduction goals are consistent with, or more aggressive than, the long-term goals established under EO S-3-05,[48] EO B-30-15,[49,50] and Senate Bill (SB) 32[51,52] the City's GHG reduction goals are consistent with EO S-3-05, EO B-30-15, AB 32, SB 32, and the 2017 Clean Air Plan. Therefore, proposed projects that are consistent with the City's GHG reduction strategy would be consistent with the aforementioned GHG reduction goals, would not conflict with these plans or result in significant GHG emissions, and would therefore not exceed San Francisco's applicable GHG threshold of significance.

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

## CONSISTENCY WITH ADOPTED PLANS AND POLICIES

SFO first developed a Departmental Climate Action Plan in 2008 as a blueprint for meeting the objectives of the City's San Francisco's qualified GHG reduction strategy in compliance with the CEQA Guidelines (Ordinance 81-08). Consistent with the City's objectives, the Airport established actions that would help the city reduce its GHG emissions 25 percent below 1990 emissions by 2017, 40 percent below 1990 emissions by 2025, and 80 percent below 1990 emissions by 2050. In 2016, the Airport developed a 5-Year Strategic Plan,

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

[46] San Francisco Department of the Environment, San Francisco's Carbon Footprint, *https://sfenvironment.org/carbon-footprint*, accessed July 19, 2017.

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

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

[49] Office of the Governor, Executive Order B-30-15, April 29, 2015, *https://www.gov.ca.gov/news.php?id=18938*, accessed March 3, 2016. Executive Order B-30-15, issued on April 29, 2015, sets forth a target of reducing GHG emissions to 40 percent below 1990 levels by 2030 (estimated at 2.9 million $MTCO_2e$).

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

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

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

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 (SAF) 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 SAF volumes at the Airport;
- Aiming to deploy nearly 2,000 electric vehicle chargers before 2023 to electrify roughly 10 percent of the Airport's parking stalls;
- Recommending that all new tenant terminal build out 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 Bay Area Rapid Transit (BART) extension to SFO and payment of BART surcharge for Airport employees to encourage public transit use;
- Construction of the electric AirTrain system, which has eliminated the need for the use of shuttle buses by all on-Airport rental car agencies;
- Implementation of energy efficiency measures at Airport and tenant facilities, including replacement light fixtures in terminals and roadways to light-emitting diode (LED), replacement of all boilers, and upgrade of heating, ventilation, and air conditioning (HVAC) systems to new technologies;

[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 January 25, 2020.

[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 October 14, 2020.

[55] Ibid.

- 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 photovoltaic system in place distributed across multiple buildings including the Harvey Milk Terminal 1 (Terminal 1 Center and Boarding Area B), Terminal 3, Long Term Parking Garage 2, Fire House #3, and the Ground Transportation Unit);
- Conversion of all SFO shuttle buses to an all-electric fleet;
- Conversion of all diesel powered vehicles and equipment to renewable diesel;
- Conversion of all light-duty passenger vehicles with zero-emission all-electric or plug-in hybrid vehicles by 2023;
- Meeting LEED Gold certification for renovation of Terminal 2 and anticipating a LEED Gold certification for renovation of Terminal 1 by implementing energy and resource conservation measures and securing LEED Gold certification for all new construction and major renovation projects;
- Replacing refrigerant gases with those with lower Global Warming Potential;
- Participation in The Good Traveler, a program for passengers to voluntarily offset the GHG emissions from travel through purchase of carbon offsets;[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;
- 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 the 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.

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

[57] San Francisco Planning Department, *Compliance Checklist Table for Greenhouse Gas Analysis, SFO West Field Cargo Redevelopment*, May 7, 2021.

## 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 not alter the 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 adopted plans and policies outside of Airport property, 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 as a city department of San Francisco, is not subject to that jurisdiction's building or zoning laws and ordinances.[58] Therefore, the modified project would not result in any new or substantially more severe impacts than those identified in the Master Plan FEIR. The modified project also would not combine with other projects in the vicinity to result in a significant cumulative impact on land use; therefore, no further analysis is necessary.

### AESTHETICS

Aesthetics impacts were determined to be less than significant in the Master Plan Initial Study (FEIR Volume III, p. A.6). The Master Plan Initial Study determined that the Master Plan would not generate adverse aesthetic or visual impacts because the Airport is separated from nearby residential uses by U.S. 101, the West of Bayshore property, and the Caltrans right-of-way. The modified project would be developed in the location of existing buildings and surface parking lots. The project site is adjacent to cargo and administration buildings within the existing Airport, which does not contain any natural features that contribute to a scenic public setting. Given that multiple at-grade and elevated freeway and freeway ramp lanes, as well as the elevated AirTrain tracks to the west, are located between the project site and the nearest residential, open space, and commercial neighborhoods, the modified project would not substantially obscure scenic views and vistas, nor would it substantially degrade the visual character or quality of the Airport. New lighting would not be excessive in the context of the existing lighting generated by existing terminal buildings, runways, airplanes, and approach roads, as well as U.S. 101 and other uses in the urbanized area surrounding the Airport. The distance between the modified project site and the closest residential areas (approximately 1,000 feet to the west 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.

[58] California Government Code sections 53090–53091.

## 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 relocate tenants in the existing cargo buildings into the new facilities, and that the proposed cargo square footage is within the cargo development analyzed in the Master Plan FEIR, the modified project would not result in an increase in employment beyond that analyzed in the FEIR. Also, there would be no increase in the number of passengers or aircraft operations at the Airport as a result of the modified project. Substantial population growth would not occur as a result of construction of the modified project because of the large existing construction labor pool present in the San Francisco Bay Area. Therefore, the modified project would not result in any new or substantially greater impacts to population and housing beyond those identified in the FEIR. The modified project also would not combine with other projects in the vicinity to result in a significant cumulative impact on population and housing; therefore, no further analysis is necessary.

## WIND AND SHADOW

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

Winds at the Airport blow predominantly from the west and west-northwest. These directions also result in the most frequent strong winds. However, some of the strongest winds blow from the southeast during winter storms, although these winds are substantially less frequent than the prevailing westerly and north-northwesterly winds. Buildings less than 80 feet in height, such as the modified project (33 to 72 feet), generally do not redirect substantial winds to ground level. In addition, wind speeds at outdoor areas and sidewalks along West Field Road adjacent to the project site are already generally reduced by the existing Airport buildings. Redirected winds would not affect an existing park or other public recreational area due to the distance between the modified project site and nearby recreational areas and intervening infrastructure and topography.

The modified project would include buildings from 33 to 72 feet tall and would generate new shadows westward in the early morning hours, year-round. Shadow would be cast on roadways and sidewalks in the vicinity of the modified project site, but this additional shadow would not substantially affect the use or function of these areas, as none of these spaces is designated or identified for recreational use or as public open space. Therefore, the modified project would not result in any new or substantially greater wind and shadow impacts beyond those identified in the Master Plan FEIR. The modified project also would not combine with other projects in the vicinity to result in a significant cumulative impact on wind and shadow; therefore, no further analysis is necessary.

## UTILITIES AND SERVICE SYSTEMS

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

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

The San Francisco Public Utilities Commission's (SFPUC) 2015 Urban Water Management Plan[59] considers SFO a "retail customer" and estimates that current and projected water supplies will be sufficient to meet future retail demand[60] 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).[61] 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 of water per day; therefore, it does not meet the definition of a water demand project. As such, the modified project would not result in any new significant impacts or substantially increase the severity of a significant impact, and no mitigation measures would be required. In addition, the modified project would not make a considerable contribution to a cumulative environmental impact caused by implementation of the Bay-Delta Plan Amendment.

The Mel Leong Treatment Plant (MLTP) has a dry weather capacity of 3.3 mgd for the sanitary plant, and the industrial plant has dry weather capacity of 1.2 mgd and a wet weather capacity of 1.7 mgd. The current average flows for the two sub-plants are approximately 0.8 mgd and 0.65 mgd, respectively; therefore, the MLTP has adequate capacity to serve the modified project, which generally comprises a consolidation and replacement of existing uses and would not substantially increase wastewater generation. The modified project would not substantially change overall Airport drainage patterns. The contractor would be required to comply with federal, state, and local requirements and guidelines to meet water quality objectives for stormwater discharge, including the Construction General Permit, the RWQCB Basin Plan, and the SFO SWPPP. Also, the Airport complies 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 Altamont Landfill, and SFO would continue to comply with solid waste statutes and regulations for its

[59] San Francisco Public Utilities Commission, 2015 Urban Water Management Plan, April 2016, *https://www.sfwater.org/Modules/ShowDocument.aspx?documentID=8839*, accessed on March 21, 2019.

[60] "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.

[61] 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, 2021.

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 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 Services (including Recreation) setting and impacts of the Master Plan were analyzed on pp. 237 to 241 and pp. 405 to 406, of the FEIR. The FEIR determined that the Airport bureaus 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 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 FEIR concluded that build out 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. Further, the modified project would not include an increase in employees beyond that analyzed in the FEIR. Thus, the increased demand for fire and police protection resulting from the modified project would not exceed that anticipated in the 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, 1,200 feet northwest of U.S. 101 and the modified project site in the City of San Bruno. Therefore, the modified project would not result in any new or substantially greater impacts to public services (including recreation) beyond those identified in the 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 general location as the cargo 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.

## Conclusion

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

Devyani Jain

Lisa Gibson
Environmental Review Officer

May 17, 2021
Date of Determination

cc: Sponsor
Distribution List
Bulletin Board/Master Decision File

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