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Certificate of Determination
Exemption from Environmental Review

Case No.:	2015-011249ENV
Project Title:	**2245 Jerrold Ave SFFD Emergency Medical Services Facility**
Zoning:	Production, Distribution and Repair (PDR-2) Use District 65-J Height and Bulk District
Block/Lot:	5286A/004 and 006
Lot Size:	60,350 and 13,350 square feet (total 73,698 square feet)
Project Sponsor:	City and County of San Francisco Fire Department, EMS Division Boris Deunert, Public Works – (415) 558-4009
Staff Contact:	Chris Thomas, Planning Department – (415) 275-9036 christopher.thomas@sfgov.org

PROJECT DESCRIPTION:

The proposed project involves demolition of two structures built in the 1950s and construction of a three-story, approximately 30,344-gross-square-foot (gsf) Emergency Medical Services (EMS) facility and a three-level, approximately 62,000-gsf parking structure (101 by 204 feet) behind the existing San Francisco

(Continued on next page)

EXEMPT STATUS:

Categorical Exemption, Class 32 (California Environmental Quality Act [CEQA] Guidelines Section 15332 – Infill Development Projects).

(Continued on page 3)

DETERMINATION:

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

Sarah B. Jones
Environmental Review Officer

December 11, 2015
Date

cc: Boris Deunert, Project Sponsor
Tina Tam, Preservation Planner
Supervisor Cohen, District 10 (via Clerk of the Board)
Distribution List
Historic Preservation Distribution List
Virna Byrd, M.D.F.

PROJECT DESCRIPTION (continued):

Fire Department (SFFD) Fire Station 9 at 2245 Jerrold Avenue. No portion of the proposed EMS facility or parking garage would front on either Jerrold Avenue or McKinnon Avenue; the two structures would be located in the interior of the project site. The existing Fire Station 9 (which fronts on Jerrold Avenue) and an open shed would remain in use. The two structures to be demolished are a 2,225-gsf, single story, 16-foot-tall structure currently used for storage and an 875-gsf, two-story, 24-foot-tall structure currently used as an office and break room. The total amount of material to be demolished is estimated to be 1,500 cubic yards.

The level 1.7-acre project site consists of two lots in an intensively developed area of San Francisco's Bayview neighborhood characterized by various warehouse, distribution and light industrial uses, about 1,300 feet south of the on-ramps to Highway 101 at its intersection with Cesar Chavez Street. The project site is bounded by Jerrold Avenue to the north, McKinnon Avenue to the south, and adjacent properties to the east and west that are developed with one to two-floor structures containing warehouse, distribution and light manufacturing uses. The proposed EMS facility traffic (that is, EMS ambulances and staff vehicles) would typically access the project site by entering on McKinnon Avenue and exiting on Jerrold Avenue.

The proposed 47-foot-tall EMS facility would replace the existing facility at 1415 Evans Avenue about 1.1 miles to the east and support the SFFD's provision of emergency medical (ambulance and paramedic) services in San Francisco.[1] The first floor (8,159-sf) would be used for equipment storage, supply, and repair; office space; and training lockers. Ambulances would be re-supplied on the southeast side of the EMS building (along the alley easement), pulling into diagonal spaces with supply cabinets on either side of the space. The ambulance supply area would be covered for rain and sun protection, but would otherwise be open. The second floor (10,980-sf) would include classroom/training, conference office, and storage space. The third floor (11,205-sf) would consist of a locker room, dormitory, kitchen/dining facility, lounge, and fitness and storage space. The dormitory, which would have a total of 12 beds, would allow EMS personnel to stay at the facility during emergencies and would not have regular use. An Enhanced Ventilation System Design with a MERV 13 filter would be installed on the roof to provide the proposed dormitory and habitable space with filtered air. Emergency power would be provided by a diesel-powered generator that meets currently required stationary source emissions requirements specified by the Bay Area Air Quality Management District (BAAQMD). The emergency generator will also be housed in sound enclosure to reduce operational noise.

The proposed 47-foot-tall concrete parking structure would provide 121 parking spaces for various emergency vehicles as well as vehicles for trainees, employees, and visitors. The parking structure would also include the emergency generator, vehicle refueling pumps, and diesel and gasoline fuel tanks. Foundations for both the EMS facility and the parking garage are proposed to be concrete grade beams on concrete caps, anchored by 80-foot-long pre-stressed concrete piles (as many as 588 piles total for the EMS facility and parking garage). Impact pile driving would not be employed for setting the piles in

[1] The disposition of the 1415 Evans Avenue facility is not known at this time.

place; rather, steel torque-down piles would be used. The depth of excavation for the grade beams would be about three feet. Excavation would be limited to the area around the grade beams and the total volume of material to be removed would be about 3,400 cubic yards. Demolition of the existing structures is expected to take about six weeks; excavation, grading and site preparation about 10 weeks; construction of the EMS facility and parking garage about 68 weeks; and clean up about 4 weeks. About four weeks of construction of one structure may overlap with excavation and site preparation of the other structure so the total construction time is estimated to be about 84 weeks. Depending upon the construction phase, 20 to 40 workers would be on-site at any one time. Construction workers would be selected from the local pool as much as possible and encouraged to use public transit or car pool. Construction workers driving their personal vehicles to the site would park in the existing parking lot or on the street.

The facility would operate 24 hours a day, seven days a week and would be staffed for both daytime and night-time shifts. Initially, the staffing at the proposed project is expected to be approximately the same as that at the existing 1415 Evans Avenue facility – a total of 97 employees on any given day, including 90 field staff and seven administrative staff. The EMS staffing level is expected to increase by about 27 percent by 2030, increasing the total number of employees on any given day to 124, including 113 field staff and 11 administrative staff.[2] Emergency vehicles would not be dispatched from the proposed facility to emergency incidents; rather (and as currently practiced), they would be dynamically deployed from the proposed facility to pre-determined positions throughout the City at the start of each work shift. Each ambulance shift is staffed with approximately six EMS technicians (generally two per ambulance). At the beginning of each shift, EMS field staff would leave the project site by ambulance to pre-determined posting locations throughout the City, returning to the project site at the end of their shift (typically 10- to 12-hours long). There would be 21 different shifts staggered throughout the day, with the peak shift changes occurring between 4:00 p.m. and 6:00 p.m.

Project Approvals

A Conditional Use Authorization from the City Planning Commission is required for establishment of a public use in the PDR-2 District.

Approval Action: The approval action for the proposed project is the Conditional Use Authorization. The Approval Action date establishes the start of the 30-day appeal period for this CEQA exemption determination pursuant to Section 31.04(h) of the San Francisco Administrative Code.

EXEMPT STATUS (continued):

CEQA Guidelines Section 15332, or Class 32, provides an exemption from environmental review for in-fill development projects that meet the following conditions. As discussed below, the proposed project satisfies the terms of the Class 32 exemption.

[2] San Francisco Department of Public Works. *San Francisco Fire Department Emergency Medical Services Building Project, Project Description Narrative*. November 30, 2015. This document and other cited documents are available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400 as part of Case File No. 2015-011249ENV.

a) The project is consistent with applicable general plan designations and policies as well as with applicable zoning designations.

The *San Francisco General Plan*, which provides general policies and objectives to guide land use decisions, contains some policies that relate to physical environmental issues. The proposed project would not conflict with any such policy. The proposed project is located within the Production, Distribution and Repair (PDR-2) District and the 65-J Height and Bulk District in the Bayview neighborhood of San Francisco. The intent of the PDR-2 District is to encourage the introduction, intensification, and protection of a wide range of light and contemporary industrial activities. While new housing, large office developments, large-scale retail, and the heaviest of industrial uses, such as incinerators, are prohibited, a variety of other uses are generally or conditionally permitted. The project site includes three structures that currently provide living, office and storage space in support of the services provided by Fire Station 9. The proposed project, which would provide a base of operations for the SFFD's provision of emergency medical services, would expand the existing public service provided by Fire Station 9. Such public uses, when conditionally permitted, are consistent with the PDR-2 District.[3] Thus, the proposed project is consistent with all applicable *General Plan* designations and applicable zoning plans and policies.

b) The development occurs within city limits on a site of less than five acres surrounded by urban uses.

The approximately 1.7 acre (73,698 sf) project site is located in an area of the intensively developed Bayview neighborhood of San Francisco that is characterized by industrial, warehouse and manufacturing uses. Therefore, the proposed project is properly characterized as in-fill development on a site of less than five acres in an area completely surrounded by urban uses.

c) The project site has no habitat for endangered, rare or threatened species.

The project site is within an almost entirely paved and built area that has been thoroughly developed for several decades. As described by the Historic Resource Evaluation prepared for the proposed project:

> "Bayview has been the locus of some of the City's most noxious and unhealthy heavy industries, including steel manufacturing, ship repair, junk yards, and auto wrecking...The development of Bayview as a predominantly industrial and residential area was thereby achieved at extensive costs to environmental health..."[4]

The only nearby open spaces are the grasslands surrounding Bernal Heights, about 1,100 feet to the west across Highway 101, and the San Francisco Bay shoreline, about 1.5 miles to the east. There is no habitat for endangered, rare or threatened species within or in the vicinity of the project site.

[3] Note that at the time Fire Station 9 was built in 1972, the then in-effect M-2 Industrial zoning district for the area did not require a conditional use authorization for a public use. The current PDR-2 zoning district requires a conditional use authorization for public uses pursuant to Planning Code Section 210.3.
[4] Carey & Co. Inc. *Historic Resource Evaluation 2245 Jerrold Avenue*, p. 11. September 9, 2015.

d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

Traffic

In order to evaluate the potential transportation impacts of the proposed project, a Transportation Memorandum (Transportation Memo) was prepared to document the existing local transportation system and conditions, and the estimated travel demand that would result with construction and operation of the proposed EMS facility.[5] The following discussion is based upon the evaluation and data presented in the Transportation Memo.

As noted, the proposed project includes the construction of a new EMS facility to be staffed 24 hours per day, seven days a week (with 21 shifts deployed throughout the day), and a three-level parking garage with 121 spaces. About 67 of those parking spaces would be for employees of the EMS facility; the remainder would be for ambulances and other emergency vehicles. The project site, located in an area almost entirely occupied by warehouse, distribution and light manufacturing land uses, is served by two regional roadways: Highway 101, about 1,000 feet to the west, and Interstate 280, about 1,500 feet to the east. The local road network surrounding the project site is generally an east-west and north-south grid of two-way streets. Direct access to the project site is provided by McKinnon and Jerrold Avenues, both of which are designated as "Industrial" streets in San Francisco's *Better Streets Plan*.[6] All intersections in the project area are stop controlled and intersection cross-walks are clearly marked.

Existing Conditions

Existing traffic conditions in the vicinity of the project area were qualitatively assessed during the evening peak hour (4:00 p.m. to 6:00 p.m.) on Thursday, November 12, 2015, and found to be very light due to nearby industrial and commercial uses being closed. Existing daily traffic conditions were evaluated quantitatively by conducting 24-hour traffic counts on Thursday, November 19, 2015 and Thursday, November 12, 2015 on Jerrold Avenue and McKinnon Avenue, respectively, adjacent to the project site. Approximately 9,381 vehicular trips were counted on Jerrold Avenue and 1,426 trips were counted on McKinnon Avenue. The peak hour on Jerrold Avenue occurs between 10:15 a.m. and 11:15 a.m., with approximately seven percent of the total daily volume occurring during that time. The peak hour on McKinnon Avenue occurs between 3:30 p.m. and 4:30 p.m., with approximately eleven percent of the total daily volume occurring during that time.

Project Travel Demand

The Transportation Memo estimates project-generated travel demand[7] by employee commute trips and project trips associated with the proposed EMS facility operations at the anticipated 2030 levels. As noted,

[5] CHS Consulting Group. *SFFD Emergency Medical Services Relocation Project Transportation Memo*. November 25, 2015.

[6] San Francisco Planning Department. *San Francisco Better Streets Plan*. December 2010. Available online at: http://www.sf-planning.org/ftp/betterstreets/index.htm.

[7] Travel demand refers to the new vehicles, transit, pedestrian, and bicycle and other traffic generated by the proposed project.

the existing EMS facility at 1415 Evans Avenue currently has a total of 97 employees on any given day, including 90 field staff and seven administrative staff. With an anticipated increase in EMS staffing levels, EMS staff is expected to increase by approximately 27 percent by 2030, and the estimated number of employees at the proposed facility on any given day would increase to a total of 124 employees, including 113 field staff and 11 administrative staff by 2030. The field staff typically works 10- to 12-hour shifts staggered throughout the day, with staffing gradually increasing during the day-time hours, and a total of 21 shifts deployed from the facility throughout the day. The administrative staff hours are from 8:00 a.m. to 4:30 p.m.

Based on the number of scheduled employees in each shift, a total of 248 person trips would be generated on a daily basis, of which 47 trips would occur during the p.m. peak hour. The Transportation Memo notes that "despite the overall increase in staffing levels by Year 2030, there would be no substantial change in the number of trips generated during the p.m. peak hour from the current operation because the additional staff would be mostly assigned to daytime shifts (shifts beginning at 6:00 a.m. or 8:00 a.m.)."[8]

As noted in the Transportation Memo, approximately 75 percent of the existing EMS employees at the 1415 Evans Avenue facility drive to work, with the remaining 25 percent taking public transit or riding a bike. Given the close proximity of the proposed EMS facility to the existing 1415 Evans Avenue facility, the Transportation Memo assumes the employee travel modes would be similar. For the purposes of travel demand, the Transportation Memo conservatively estimates that approximately 80 percent of the EMS employees at the proposed facility would drive, 15 percent would take transit, and five percent would bike to work, generating about 44 vehicle trips, seven transit trips, and one bike trip during the p.m. peak hour. Of the estimated 44 vehicle trips, 17 would occur in the inbound direction and 27 trips would occur in the outbound direction. The estimated number of vehicle trips include three inbound and three outbound ambulance trips generated by the proposed project. Table 1 summarizes project-generated trips by mode for the proposed EMS facility.

Table 1. Project-Generated Trips (by Mode) During the PM Peak Hour

Mode	Percent	Inbound	Outbound	Total
Vehicle	80	17	27	44*
Transit	15	3	4	7
Bike	5	1	1	2
Total	**100**	**21**	**32**	**53**

Source: CHS Consulting Group. *SFFD EMS Relocation Project Transportation Memo*, December 2015.

* Includes three (3) inbound and three (3) outbound ambulance vehicle trips generated by the proposed project.

[8] CHS Consulting Group. *SFFD Emergency Medical Services Relocation Project Transportation Memo*, page 12. November 25, 2015.

With regards to trips associated with proposed operations of the EMS facility, it is noted again that the principal function of the EMS facility would be to serve as an administrative center for deploying ambulances, provide for their restocking with necessary first aid materials and equipment, and to provide emergency-only shelter space on-site. The proposed project is not a publicly-accessible facility and provides no emergency services. Ambulances would be dynamically deployed at regularly staggered shifts to pre-determined posting locations throughout the City, from where they would respond to emergency calls. Continuing education and re-certification of EMS personnel would also be conducted at the project site once or twice a month. The EMS staff who commute to the proposed EMS facility would also attend the training sessions offered on-site and thus, would not contribute to net new trips beyond those estimated above.

The proposed EMS facility operations include the deployment of 21 shifts that are 10- or 12-hours long and are staggered throughout the day with the peak shift changes occurring between 4:00 p.m. and 6:00 p.m. Currently, there is a total of 37 outbound and inbound ambulance trips departing from and returning to the proposed EMS facility at 1415 Evans Avenue over a one-day period. Consistent with the assumption that a 27 percent increase in staffing generally reflects a similar increase in the number of overall ambulance trips, approximately 47 outbound and inbound trips would be expected over the course of a day in 2030. In 2030 and as analyzed in the Transportation Memo, there would be a total of six ambulance trips with three inbound and three outbound trips from the project site during the p.m. peak hour.

In addition, the Transportation Memo estimates that there would be two vendor trips per day at the proposed EMS facility. Visitor trips would account for another one to two trips per day. However, similar to current practices at the existing EMS facility at 1415 Evans Avenue, vendor trips would only occur between 10:00 a.m. and 4:00 p.m. at the proposed EMS facility in order to avoid the morning and evening peak traffic periods. Therefore, vendor-related trips would not contribute any net new trips to the project site.

Project-related vehicle trips include employees, ambulance rotations, visitors, and vendors, traveling to and from the project site throughout the day. As discussed above, the proposed project would generate approximately 44 vehicle trips including 17 inbound trips and 27 outbound trips during the p.m. peak hour. These trips would increase traffic volumes on nearby streets such as Bayshore Boulevard, McKinnon Avenue, Jerrold Avenue, and Barneveld Avenue. Because these trips would spread over multiple streets and directions, Bayshore Boulevard, McKinnon Avenue, Jerrold Avenue, and Barneveld Avenue would each experience a marginal increase in traffic volumes due to the project.

With the addition of project-related vehicles, traffic volumes would remain at levels less than the carrying capacity of the roadways.[9] While adding 44 vehicles during the p.m. peak hour would be noticeable in the immediate vicinity of the project site, it would not cause significant impacts to traffic operations along

[9] Per San Francisco County Transportation Authority's *Travel Demand Forecasting Model Development*, capacity for urban roadways in San Francisco is approximately 550 vehicles per hour per lane.

McKinnon, Jerrold, or other nearby streets. Therefore, the proposed project would have a less-than-significant impact related to traffic.

Finally, the observed p.m. peak traffic volumes on nearby streets (Jerrold Avenue – 642 vehicles and McKinnon Avenue - 157), would accommodate the addition of project-generated traffic (44 vehicles) without causing the intersection to fail or operate at LOS E or F. In addition, this segment of Jerrold Avenue and McKinnon Avenue were observed to have relatively low traffic volumes under existing conditions and this would likely remain a low-volume roadway in the future, as well. Thus, the proposed project would have less-than-significant traffic impacts, either individually or cumulatively.

Transit

The project site is currently within 800 and 960 feet of bus stops at Jerrold Avenue and Toland Street and Jerrold Avenue and Bayshore Boulevard, respectively. These stops are served by the San Francisco Municipal Transit Authority (Muni) routes 9, 9R, 19 and 23. As discussed in the Transportation Memo, each of these four routes operates below Muni's 85 percent capacity threshold. The proposed project would generate approximately seven (7) transit trips, which would be accommodated within the existing capacity of the Muni lines serving the project site. Further, the project-generated 44 p.m. peak hour vehicle trips would not result in substantial conflicts with transit serving the area.

Given the low volumes of traffic on Jerrold Avenue and McKinnon Avenue, under existing conditions, as well as the low traffic volumes anticipated in the future, the proposed project would not substantially impede transit operations on nearby roads. Further, the proposed project would not substantially affect transit operations and no bus stops would be affected; thus, the proposed project would have a less-than-significant impact related to transit operations.

Pedestrians

Streets in the vicinity of the project site were all observed to have sidewalks. Intersections are stop-controlled with well-defined crosswalks and curb ramps. The Transportation Memo estimated that the proposed project would not generate pedestrian trips aside from the seven transit trips necessitating walks between the project site and the bus stop during the p.m. peak hour. The addition of these seven p.m. peak hour pedestrian trips related to transit would not interfere with pedestrian circulation to nearby areas or create hazardous conditions for pedestrians. Therefore, the proposed project would have a less-than-significant impact related to pedestrians.

Bicycles

The project site is in the vicinity of four bicycle routes (25, 170, 60, and 68) that are a part of the San Francisco Bicycle Network. As stated by the Transportation Memo, very little bicycle travel was observed during the weekday evening (4:00 p.m. to 6:00 p.m.) period on Thursday, November 12, 2015. The proposed project, which would provide four Class I bicycle parking spaces and two Class II bicycle parking spaces in the proposed parking garage, would generate approximately two bicycle trips during the p.m. peak hour. The existing capacity of nearby bicycle routes would be able to accommodate this

increase in bicycle trips without impact. Further, the 44 p.m. peak hour vehicle trips that would result during operation of the proposed project would not create potentially hazardous traffic conditions for bicyclists. Therefore, the proposed project would have a less-than-significant impact related to pedestrians.

Loading

The Transportation Memo notes that several industrial buildings in the project study area have off-street loading bays for trucks. The proposed project would accommodate all loading activities (estimated at two vendor trips per day) within the project site. In addition, there are a total of 19 on-street freight (yellow) loading spaces within the area bounded by Oakdale Avenue, Barneveld Avenue, Toland Street, and the midblock of Napoleon Street. Based on field observations made during the midday (11:00 a.m. to 1:00 p.m.) period on Thursday, November 12, 2015, both on- and off-street loading facilities in the vicinity of the project site experienced a moderate level of commercial loading activities without impeding traffic. As noted, the proposed project would generate one to two vendor trips per day. These vendors could park in the five visitor spaces to be provided in the parking garage or they could utilize the available curb spaces on Jerrold Avenue or McKinnon Avenue. Given the limited number of vendor trips and other deliveries, the proposed project's impact upon loading would be considered less than significant.

Parking

On-street parking surveys conducted during a typical mid-day period (11:00 a.m. to 1:00 p.m.) on Thursday, November 12, 2015, determined that 78 percent (477 spaces) of the 611 parking spaces within the area bounded by Oakdale Avenue, Barneveld Avenue, Toland Street, and the midblock of Napoleon Street were occupied, leaving 134 spaces unoccupied. The Transportation Memo estimates that 80 percent of the 124 staff predicted for the proposed project in 2030 would drive to the EMS facility, generating a peak parking demand of 75 parking spaces around 4:00 p.m. As discussed, of the 121 parking spaces to be provided by the proposed parking garage, about 67 parking spaces would be reserved for employees, resulting in a deficit of about eight parking spaces that would potentially spill over onto the surrounding public roadways. Given the available parking spaces noted above, a deficit of eight parking spaces would have a less-than-significant significant impact with regards to local on-street parking such that hazardous roadway conditions or significant traffic delays would occur.

Construction

As noted in the Project Description above, construction of the proposed project would take about 84 weeks, with 20 to 40 construction workers on-site at any given time. The hours of construction would be stipulated by the Department of Building Inspection and the construction contractor would have to comply with Section 2908 of the Noise Ordinance that generally limits construction activities to seven days a week between 7:00 a.m. and 8:00 p.m., unless specially permitted by the Department of Public Works. During this period, construction-related vehicles would travel to and from the site, in addition to workers in their vehicles. There is adequate room for construction worker vehicles, construction

equipment vehicles and materials to be staged within the project site and not on surrounding streets. Therefore, it is not anticipated that any construction-related lane closure would be required.[10]

The Transportation Memo estimates that construction of the proposed project would generate up to 50 daily round trips during the peak construction period, including the six to 10 daily trips to haul away construction debris and excavated soil during the 16 weeks estimated for demolition and excavation. The construction contractor would be required to meet the City's Regulations for Working in San Francisco Streets (the "Blue Book") and would be required to meet with SFMTA, Public Works, and other responsible City agencies to determine feasible traffic management measures. The project construction truck traffic would result in periodic and momentary decreases in the capacities of local streets in the project area due to their slower movement and larger turning radii of project-related construction trucks. However, due to its temporary nature and available areas for off-street staging of construction materials and vehicles, project-related construction impacts on traffic would be considered less than significant.

Noise

Ambient noise levels in the vicinity of the project site are typically dominated by vehicular traffic, including Muni vehicles, trucks, cars, emergency vehicles, street maintenance, and land use activities themselves, such as manufacturing, warehousing and distribution. The nearest sensitive receptors[11] are located in the residential neighborhoods of Bernal Heights, about 1,100 feet to the west and across Highway 101. The Department of Public Health's Traffic Noise Model indicates that the ambient noise level at the project site is within a range of 60 to 70 decibels (dBA).[12]

San Francisco's General Plan Environmental Protection Element Policy 11.1 provides a "Land Use Compatibility Chart for Community Noise" chart with recommendations regarding the need for a detailed noise analysis based on a proposed project's land use characteristics and the existing ambient noise level. The proposed EMS facility is not represented among the land use categories in the chart; however, for various land uses (e.g., office, commercial, manufacturing) a detailed noise analysis is recommended when the ambient noise level is between 64 and 70 dBA (L_{eq}). Accordingly, a Noise Study was prepared to evaluate the proposed project with regard to potential construction noise and vibration impacts to surrounding receptors, noise resulting from fixed sources (HVAC and the emergency generator), and routine activities once the proposed facility is operational.[13] The Noise Study also made recommendations for noise reduction for the dormitory and habitable space that would be provided for

[10] Were a lane closure required, a lane closure permit subject to review and approval by the Department of Public Works (DPW) and the Transportation Advisory Staff Committee (TASC) would be required. The TASC consists of representatives from the Fire Department, Police Department, MTA Traffic Engineering Division, and Department of Public Works.

[11] Sensitive receptors with regard to noise are typically considered to include uses residences, health care and convalescent facilities, and school, day care, and religious facilities.

[12] San Francisco Department of Public Health *Noise Map*. March, 2009. Available at: http://www.sf-planning.org/ftp/files/publications_reports/library_of_cartography/Noise.pdf. Accessed 11/25/15.

[13] Wilson Ihrig, *SF Fire Department Emergency Medical Services Facility, San Francisco California Construction, Mechanical and Project-Generated Noise*. November 24, 2015.

EMS personnel in the proposed facility, even though such users would not be considered sensitive receptors because their stay would be periodic and temporary. To quantify and characterize the existing noise environment, long-term measurements (continuous measurements at one-hour intervals) were made at the McKinnon Avenue point of ingress and at the location of the proposed facility. Short-term noise measurements were also made at three locations behind the fire station with simultaneous measurements at both five and 25 feet in height.

The Noise Study determined that the average (or ambient) daytime noise level is 59 dBA at the location of the proposed facility and 64 dBA at the McKinnon Avenue point of ingress. The corresponding maximum daytime levels are between 65 to 81 dBA at the location of the proposed facility and 73 to 91 dBA at the McKinnon Avenue point of ingress. The primary noise sources include vehicles on surface streets (e.g., trucks, busses and motorcycles) and the two highways. Other contributors to the local noise level are the repair and fabrication businesses on McKinnon Avenue. The simultaneous, short-term measurements taken five and 25 feet above the ground at three locations behind the fire station indicate that the sound level is constant across the project site, with a typical increase of two to three dBA at 25 feet, likely due to the greater influence of noise from Highway 101 and Interstate 280.

The Noise Study also evaluated properties adjacent to and within 1,000 feet of the project site that have a direct line of sight to the proposed facility in order to assess their susceptibility to the proposed project's construction noise from the project site.

Construction Noise and Vibration

As noted, the proposed project would be constructed over an estimated period of 84 weeks. Construction would occur in the following overlapping phases:

- Demolition: approximately 6 weeks
- Excavation, grading and site preparation: approximately 10 weeks
- Construction: approximately 68 weeks
- Clean up: approximately 4 weeks

The loudest noise and greatest vibration would be expected during demolition and excavation activities that would occur with the periodic use of heavy equipment such as a bulldozer, backhoe with hoe ram, grader and cement truck. Noise would also be expected from the various tools used for exterior and interior finish work, although it would be at lower levels than that from demolition, excavation and foundation work. Construction would occur in close proximity to surrounding structures. However, the surrounding structures involve warehousing, distribution and light manufacturing uses that are not considered sensitive receptors. Fire Station 9 would similarly not be considered a sensitive receptor. The Noise Study notes that the existing construction of the adjacent buildings (concrete tilt-up warehouse structures) "should typically provide about 15 to 25 dB noise reduction for construction noise: older industrial buildings with leaky windows would reduce noise by 15 dB and newer concrete buildings with

no exposed windows would reduce noise by 30 dB."[14] Fire Station 9 is a modern concrete structure for which the Noise Study determined that construction noise would have to exceed 80 dBA to result in a substantial noise increase.

Delivery truck trips and construction equipment would generate noise that that may be considered an annoyance by occupants of nearby properties. Sections 2907 and 2908 of the City's Noise Ordinance (Article 29 of the Police Code) regulate construction equipment noise and nighttime construction, respectively. Section 2907(a) requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA at 100 feet from the source. Per Section 2907(b), impact tools are not limited to 80 dBA at 100 feet from a property line, but they must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Table 3 below is reproduced from the Noise Study and provides the noise levels at 100 feet for the equipment anticipated to be used in construction of the proposed project. Note that the only impact equipment would be the backhoe loader with hoe ram for demolition. (As discussed, piles will be drilled into place, not hammered).

Table 3. Anticipated Construction Equipment and Noise Levels at 100 Ft.

Heavy Noisy Equipment	Number	Maximum Sound Pressure Level at 100' (dBA)	Comments
Skid Steer Loader	1	73	
High Reach Demolition Excavator	1	75	
Excavator	1	75	
50 ton Crawler Crane	1	75	
Backhoe Loader with Hoe Ram	1	**84**	Impact equipment
Vibration concrete Compactor	1	74	
Concrete Pump/Truck	1	75	
Concrete Saw	1	**84**	

Bold numbers represent values over the 80 dBA at 100' Maximum.

Source: Wilson Ihrig, *SF Fire Department Emergency Medical Services Facility, San Francisco California Construction, Mechanical and Project-Generated Noise*. November 24, 2015.

[14] Ibid, p. 8

Construction of the northern portion of the proposed parking garage would occur within 100 feet of Fire Station 9. As shown in Table 3, the backhoe loader with hoe ram (or backhoe ram) and concrete saw exceed the 80 dB limit at 100 feet. As noted, Section 2907(b) of the Noise Ordinance requires that impact tools must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Given that demolition and the use of the backhoe ram would be limited in duration and that the nearest sensitive receptors are about 1,000 feet away, a significant impact with regard to construction noise would not be expected. Similarly, use of the concrete saw would also be limited in duration. While annoyance to the immediately surrounding land uses (including Fire Station 9) may occur during construction, the concrete walls enclosing these uses would reduce the noise level by 15 to 30 dB.

Section 2908 of the Noise Ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m. if it would produce noise levels that exceed the ambient noise level by 5 dBA at the project property plane, unless a special permit is authorized by the Director of Public Works. The project sponsor has stated that the only night-time work would be when a construction trailer is moved to the site; otherwise night-time work is not anticipated for the proposed project.[15] The movement of the construction trailer would not exceed the Section 2908 limit of 5 dBA at the property plane.

In conclusion, although construction noise may result in annoyance to surrounding receptors, it would result in a less-than-significant impact due to its limited duration and periodic occurrence. While there would be a less-than-significant noise impact as a result of construction of the proposed project, the Noise Study recommended the following best practices to further reduce non-significant noise effects:

1. Construct an eight to ten-foot-tall sound fence along the property line and adjacent to neighboring buildings and apply two psf/STC 25 "sound blankets" to the existing security fence.
2. Notify in advance the occupants of neighboring buildings about noise generating activities and the construction schedule.
3. Reduce concrete saw noise with use of a "quiet" blade.

These best practices have been agreed to by the project sponsor and will be included in the construction plans for the proposed project.[16]

Operational Noise

Noise would occur with operation of the roof-top HVAC and emergency generator. Noise would also result from the traffic the proposed project creates. In general, Section 2909(c) of the Noise Ordinance limits noise from any machine or device on properties with a public use to 10 dBA above the local ambient at a distance of 25 feet or more. As the ambient is 59 dBA, the fixed noise sources would be limited to 69 dBA at a distance of 25 feet from either the HVAC or emergency generator. As noted previously, however, the project site users and surrounding users in the immediate project vicinity are

[15] Email from Boris Deunert, Public Works, to Chris Thomas, Planning Department, November 24, 2015.

[16] Email from Boris Deunert, Public Works, to Chris Thomas, Planning Department, November 25, 2015.

not considered sensitive receptors in regards to noise; the nearest sensitive receptors are in the residential areas of Bernal Heights, about 1,000 feet to the west.

Although noise from the HVAC unit would be expected to result in a less-than-significant impact to the sensitive receptors in Bernal Heights, the sponsor has stated that the HVAC unit would be enclosed in either an acoustically screened area or within a penthouse with acoustic louvers in order to comply with Section 2909(c).[17]

The emergency generator would be located in the new parking garage. A Kohler Power Systems Model 400REOZJB diesel-powered generator set with a John Deere Model 6135HFG84 engine has been selected as the emergency generator. The emergency generator would only be used during emergencies and when periodically tested. (As discussed below under Air Quality, the emergency generator would be limited to 50 hours of operation per year.) As such, impacts to sensitive receptors in Bernal Heights would be less-than-significant with regard to operation of the emergency generator. Although no impact to sensitive receptors is anticipated due to the limited and periodic operation of the emergency generator, it would be placed in a sound enclosure that would further reduce its operational noise levels.[18]

In regards to the proposed project's contribution to the existing ambient noise level, noises generated by trucks and manufacturing are common and generally accepted in industrial areas. An approximate doubling of traffic volumes in the project area would be necessary to produce an increase in ambient noise levels noticeable to most people (that is, a three decibel increase).[19] As discussed under Traffic, the proposed project would not be anticipated to cause a doubling in traffic volumes in the vicinity of the project site. The noise generated by the proposed EMS uses would be considered common and generally acceptable in a PDR area, and would not be considered a significant impact.

Considering the above, the proposed project would not result in a significant impact with respect to either construction or operational noise.

Project Receptors and Surrounding Noise

Once the proposed facility is operational, noise from outside the project site would be heard by personnel who using the dormitory for sleep. Habitable residential space is subject to Title 24 interior noise standard of 45 dBA. The proposed project would not constitute a residential use and therefore would not be subject to Title 24. Given that the dormitory space would not be regularly occupied, its users would not be considered sensitive receptors. In any event, the Noise Study recommends that the third-floor dormitory meet the 45 dBA interior noise standard and states that the concrete construction techniques that would be employed in the proposed EMS facility would "easily reduce noise by 20 dBA or more even with windows open." As discussed, the maximum hourly Leq was measured at 62 dBA. The proposed facility would thus meet the interior noise level of 45 dBA for the dormitory.

[17] Ibid.

[18] The sponsor has selected a Kohler Power systems Model 350-500REOJZ enclosure.

[19] A decibel is a unit of measurement describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure, which is 20 micropascals.

Air Quality

As noted, the project site is in an area characterized by light industrial, warehouse and distribution land uses. As discussed below, it is also in the Air Pollutant Exposure Zone. The nearest sensitive receptors[20] with regard to air quality would be the residential neighborhoods in Bernal Heights, about 1,100 feet to the west of the project site.

Criteria Air Pollutants

In accordance with the state and federal Clean Air Acts, air pollutant standards are identified for the following six criteria air pollutants: ozone, carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO_2), sulfur dioxide (SO_2) and lead. These air pollutants are termed criteria air pollutants because they are regulated by developing specific public health- and welfare-based criteria as the basis for setting permissible levels. The BAAQMD CEQA Air Quality Guidelines (May 2011) provide screening criteria to determine if projects would violate an air quality standard, contribute substantially to an air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants within the San Francisco Bay Area Air Basin.[21] If a proposed project meets the screening criteria, then the project would result in less-than-significant criteria air pollutant impacts. A project that exceeds the screening criteria may require a detailed air quality assessment to determine whether criteria air pollutant emissions would exceed significance thresholds.

The screening criteria for an EMS facility and parking garage are not explicitly provided in the BAAQMD screening table (Table 3-1). However, the proposed project may be considered generally comparable to various land use types in Table 3-1, such as hospital, general light industry, or government (civic center), all of which have construction and operational screening sizes larger in area than that of the proposed project. The proposed 30,344-gsf EMS facility and approximately 62,000-gsf parking structure (together about 92,344-gsf) would not exceed the BAAQMD criteria air pollutant screening levels for operation or construction of a comparable facility and further analysis of criteria air pollutant emissions is not necessary. It is noted that the current EMS vehicle fleet includes 24 gas-powered ambulances that are less than five years old and 30 diesel ambulances that are greater than 10 years old. As the fleet ages, new vehicles will be purchased. In accordance with the Healthy Air and Clean Transportation Ordinance (San Francisco Environmental Code Chapter 4, Section 403), new purchases of EMS vehicles would be the cleanest and most efficient vehicles on the market. Further, all diesel powered ambulances will have to run on renewable diesel fuel (that is, non-petroleum-based diesel fuel).[22] For the above reasons, the proposed project would have a less-than-significant impact with regard to criteria air pollutants.

[20] Sensitive receptors with regard to air quality are generally considered to include children, the elderly, and the infirm. Sensitive land uses would include residences, schools and health facilities.

[21] Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, Updated May 2011. See Table 3-1.

[22] San Francisco Office of the Mayor News Release: "Mayor Lee Announces San Francisco to Use Renewable Diesel in City Fleet." July 21, 2015. Accessible at: http://www.sfmayor.org/index.aspx?recordid=919&page=846.

Construction

Construction activities can result in fugitive dust that may result in impacts to surrounding receptors. The proposed project would be subject to the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008), which was established with the intent of reducing the quantity of dust generated during site preparation, demolition, and construction work in order to protect the health of the general public and of onsite workers, minimize public nuisance complaints, and to avoid orders to stop work by DBI. The Ordinance requires that all site preparation work, demolition, or other construction activities within San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square-feet of soil comply with specified dust control measures whether or not the activity requires a permit from DBI. The Director of DBI may waive this requirement for activities on sites that are less than one half-acre that are unlikely to result in any visible wind-blown dust.

In compliance with the Construction Dust Control Ordinance, the project sponsor and the contractor responsible for construction activities at the project site would be required to use the following practices to control construction dust on the site or other practices that result in equivalent dust control that are acceptable to the Director of DBI. Dust suppression activities may include watering all active construction areas sufficiently to prevent dust from becoming airborne; increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water must be used if required by Article 21, Section 1100 et seq. of the San Francisco Public Works Code. If not required, reclaimed water should be used whenever possible. Contractors shall provide as much water as necessary to control dust (without creating run-off in any area of land clearing, and/or earth movement). During excavation and dirt-moving activities, contractors shall wet sweep or vacuum the streets, sidewalks, paths, and intersections where work is in progress at the end of the workday. Inactive stockpiles (where no disturbance occurs for more than seven days) greater than 10 cubic yards or 500 square-feet of excavated materials, backfill material, import material, gravel, sand, road base, and soil shall be covered with a 10 millimeter (0.01 inch) polyethylene plastic (or equivalent) tarp, braced down, or use other equivalent soil stabilization techniques. The proposed project would result in a less-than-significant impact to public health and the environment with compliance with the Construction Dust Control Ordinance.

Health Risk

In addition to criteria air pollutants, individual projects may emit toxic air contaminants (TACs). TACs collectively refer to a diverse group of air pollutants that are capable of causing chronic (i.e., of long-duration) and acute (i.e., severe but short-term) adverse effects to human health, including carcinogenic effects. In response to growing concerns of TACs and their human health effects, the San Francisco Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes, generally referred to as the Enhanced Ventilation Required for Urban Infill Sensitive Use Developments or Health Code, Article 38 (Ordinance 224-14, effective December 8, 2014)(Article 38). The purpose of Article 38 is to protect the public health and welfare by establishing an Air Pollutant Exposure Zone and imposing an enhanced ventilation requirement for all urban infill sensitive use developments within the Air Pollutant Exposure Zone. Projects within the Air Pollutant Exposure Zone require special

consideration to determine whether the project's activities would expose sensitive receptors[23] to substantial air pollutant concentrations or add emissions to areas already adversely affected by poor air quality.

The proposed site is within an Air Pollutant Exposure Zone. The dormitory would not represent a sensitive use with regard to health risk because it would generally be used only during emergencies; therefore, Article 38 would not apply to the proposed project. Although the proposed project would not introduce sensitive uses to the project site, the project sponsor has submitted an Enhanced Ventilation Proposal for approval by the Department of Public Health (DPH) that achieves protection from $PM_{2.5}$ (fine particulate matter) equivalent to that associated with a Minimum Efficiency Reporting Value 13 filtration.[24] Installation of an enhanced ventilation system would ensure that EMS personnel using the proposed facility's habitable space breathe clean air. Therefore, there would be a less-than-significant impact to personnel at the proposed facility with regards to a health risk associated to the Air Pollutant Exposure Zone.

As noted, the proposed project would require construction activities for an approximate 84-week construction period, some of which would result in short-term emissions of diesel particulate matter and other toxic air contaminants that can pose health risks to nearby sensitive receptors. Again, the surrounding warehouse, distribution and light industrial land uses are not considered to include sensitive receptors, nor are personnel who would use the proposed dormitory space considered sensitive receptors.

In April 2007, the City and County of San Francisco adopted the Clean Construction Ordinance (Ordinance 28-15) requiring public projects to reduce emissions at construction sites starting in 2009. In March 2015, the City expanded the existing Clean Construction Ordinance to require public projects to further reduce emissions at construction sites in certain areas with high levels of background concentrations of air pollutants. The proposed project is subject to the Clean Construction Ordinance[25] which requires that a Construction Emissions Minimization Plan be prepared.[26] While emission reductions from limiting idling, educating workers and the public and properly maintaining equipment are difficult to quantify, other measures in the Construction Emissions Minimization Plan, specifically the requirement for equipment with Tier 2 engines and Level 3 Verified Diesel Emission Control Strategy (VDECS), can reduce construction emissions by 89 to 94 percent compared to equipment with engines meeting no emission standards and without a VDECS. Emissions reductions from the combination of Tier 2 equipment with Level 3 VDECS are almost equivalent to requiring only equipment with Tier 4 Final

[23] Sensitive receptors include, but are not limited to, hospitals, schools, daycare facilities, elderly housing and convalescent facilities.

[24] San Francisco Department of Public Health, *Application for Article 38 Compliance Assessment*, 2245 Jerrold Avenue. October 30, 2015.

[25] Refer to Ordinance No 28-15 for more information. The Ordinance is available at: https://sfgov.legistar.com/Legislation.aspx (Board File Nos. 140805 AND 150526 or Ordinance No. 28-15).

[26] Refer to https://www.sfdph.org/dph/EH/Air/CleanConstruction.asp (will link to the handout on DPH's website) for more information.

engines, which is not yet readily available for engine sizes subject to the Clean Construction Ordinance. While there are no sensitive receptors close enough to the project site to be affected by diesel emissions from its construction, compliance with the Clean Construction Ordinance would further reduce construction emissions.

Note too that, in accordance with the Clean Construction Ordinance, the contract for the construction of the project would specify that diesel vehicles are fueled with B20 biodiesel and that the construction equipment would meet USEPA Tier 3 standards or best available control technologies for equipment over 25 hp. Therefore, the construction of the proposed project would result in a less-than-significant impact with regards to health risk.

Stationary Sources (Fueling Station and Emergency Generator)

The parking facility will include a diesel-powered emergency generator with belly tank, vehicle refueling pumps, and diesel and gasoline fuel tanks. Gas stations, also referred to as Gasoline Dispensing Facilities (GDF's), are a source of TACs due to the uncontrolled emissions associated with tank filling, vehicle fueling, and minor spillage as part of routine operations. All gasoline dispensing facilities are subject to BAAQMD's Regulations 8, Rule 7 (Gasoline Dispensing Facilities), which has a goal of limiting emissions of organic compounds from gasoline dispensing facilities. Regulation 8, Rule 7 applies to any stationary operation which dispenses gasoline directly into the fuel tanks of motor vehicles and treats such facility as a single source including all necessary fuel-dispensing equipment, such as nozzles, dispensers, pumps, vapor return lines, plumbing and underground and aboveground storage tanks. In addition, the California Air Resources Board (CARB) evaluates and tests new and modified vapor recovery systems, which are required as part of GDF operations to recover gasoline vapors generated while fueling vehicles in a service station. Therefore, the sponsor would be required to apply for the CARB and BAAQMD permits.

The Permit to Operate contains conditions such as the facility's permitted annual throughput, as well as other requirements specific to the individual GDF, such as information regarding underground storage tanks, nozzles, and vapor recovery systems. Inspections of each permitted facility are conducted by BAAQMD staff on an annual basis to ensure that each operator complies with all conditions specified in the Permit to Operate. Operators who violate permitting conditions are fined by the District. As part of the permitting process, the amount of TAC emissions anticipated from a project's operations are calculated based on the information provided in the project application. If the amount of anticipated TAC emissions constitutes an increase over a permitted baseline (a predetermined amount of TAC emissions that is set by the District for each facility), the District performs a more detailed health screening, which measures the impact of the additional TAC emissions on the surrounding population.

Given changing fuel efficiency and other operational variables, it is difficult to determine fuel throughput for the proposed facility in the future. If the 27 percent staff staffing increase is used as a rough approximation of the increase in future fuel throughput, the current usage would rise to approximately 111,320 gallons of fuel per year in 2030. The BAAQMD would determine whether a health screening would need to be performed with such an increase to ensure that the anticipated TAC emissions do not

result in excess cancer risk of more than ten per one million population. If such an exceedance is anticipated, the District would either require the applicant to install Best Available Control Technology for Toxics (TBACT) or would deny the facility's Permit to Operate. If some increase in TACs is anticipated but it is below the excess cancer risk discussed above, and if the gas station is within 1,000 feet of a sensitive receptors, the applicant would be required to undergo a public notification process. (As noted, the residences in Bernal Heights, about 1,100 feet to the west, are currently the nearest sensitive receptors to the project site.) Through the permitting and annual inspections process, the District would ensure that the proposed project does not generate a substantial amount of TAC emissions that could affect nearby sensitive receptors.

It is noted that, in general, TACs associated with GDFs have decreased over the years due to more stringent regulations, fuel reformulations, and an increase in the effectiveness of vapor recovery systems. Therefore, it is possible to increase gasoline throughput without increasing the amount of TACs emission anticipated.[27] For this reason, the District focuses on TACs through the permitting process rather than exclusively on the anticipated throughput. Given the permitting requirements described above, the relatively low, permitted throughput amount, and because the latest vapor recovery system and other equipment would be used, it is expected that the fueling depot component of the proposed project would result in less-than-significant operational impacts related to TAC emissions.

The emergency generator would be permitted as an emergency standby diesel engine as defined in the CARB Airborne Toxics Control Measure (ATCM) for Stationary Compression Ignition Engines,[28] and would be subject to BAAQMD rules and permitting requirements. Accordingly, the proposed emergency generator would be operated only during an unforeseeable failure of regular electric power supply. The ATCM states an emission standard, which is a CARB emission limit, of 0.15 grams per brake horsepower–hour (g/bhp-hr) for new stationary emergency standby diesel-fueled engines, and limits testing and maintenance operation of engines in this category to no more than 50 hours per year.

The proposed generator would be a Kohler Power Systems Model 400REOZJB diesel-powered generator set, with a John Deere Model 6135HFG84 engine. In accordance with the ATCM requirements stated above, the representative engine model is rated as a United States Environmental Protection Agency (EPA) Emergency Stationary/Tier 3-equivalent engine with a certified emission factor for diesel particulate matter of 0.12 g/bhp-hr. Emergency generators must meet the BAAQMD's Best Available Control Technology diesel particulate matter threshold of 0.15 g/bhp-hr for emergency engines. Accordingly, the emergency generator would have a less-than-significant impact with regard to health risk.

In conclusion, the proposed project would result in less-than-significant air quality impacts.

[27] Phone call between Scott Owen, P.E., Supervising Air Quality Engineer, Bay Area Air Quality Management District, and Tania Scheyner, Planning Department, September 17, 2014.

[28] California Air Resources Board, Airborne Toxics Control Measure for Stationary Compression Ignition Engines, 17 Cal. Code Regs. § 93115.6(a)(3)(A)1.c. (May 19, 2011).

Water Quality

The proposed project would not generate substantial additional wastewater or result in discharges that would have the potential to degrade water quality or contaminate a public water supply. Project-related wastewater and stormwater would flow to the City's combined sewer system and would be treated to standards contained in the City's National Pollutant Discharge Elimination System (NPDES) Permit for the Southeast Water Pollution Control Plant prior to discharge. The existing lot is substantially covered by impervious surfaces and the proposed structures would occupy already paved and built-out spaces. With its construction and operation, the proposed project would not result in an increase in the amount of impervious surface area on the site or, in turn, an increase in the amount of runoff and drainage. Additionally, compliance with the Stormwater Management Ordinance (Ordinance No. 83-10) would require the proposed project to maintain or reduce the existing volume and rate of stormwater runoff at the site by retaining runoff onsite, promoting stormwater reuse, and limiting site discharges before entering the combined sewer collection system. Therefore, the proposed project would not substantially alter existing groundwater quality or surface flow conditions, and would result in less-than-significant impacts related to hydrology and water quality.

e) The site can be adequately served by all required utilities and public services.

The project site is located in a well-developed area where all required utilities and public services and facilities are built and available. No expansion of public services or utilities is anticipated. Prior to receiving a building permit, the project would be reviewed by the appropriate City agencies and departments to ensure compliance with City and State fire and building codes related to building standards and fire protection. The proposed project would not result in a substantial increase in intensity of use or demand for utilities or public services that would necessitate any expansion of public utilities or public services.

DISCUSSION OF ENVIRONMENTAL ISSUES:

CEQA Guidelines Section 15300.2 establishes exceptions to the application of a categorical exemption for a project. None of the established exceptions applies to the proposed project.

Guidelines Section 15300.2, subdivision (c), provides that a categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances. As discussed above, the proposed project would not have a significant effect on traffic, noise, air quality and water quality. In addition, the proposed project would not have a significant effect on the environment due to unusual circumstances for other environmental topics, including those discussed below.

CEQA Guidelines Section 15300.2, subdivision (f), provides that a categorical exemption shall not be used for a project that may cause a substantial adverse change in the significance of a historical resource. For the reasons discussed below under "Historic Architectural Resources," there is no possibility that the proposed project would have a significant effect on a historic resource.

Environmental Topics

Geologic Hazards

A Geotechnical Memorandum was prepared for the proposed project.[29] The project site is within the former historic channel and/or marshland associated with Islais Creek, and is underlain by artificial fill placed over tidal flats of clay, silt, sand and rock fragments. A geotechnical soil boring to approximately 26-feet in depth in 1998 encountered loose to medium sand, gravelly sand and clayey sand from the surface to 18 feet below the ground surface. These sandy layers are generally loose to medium dense and prone to liquefaction. Underlying these sandy layers is a thick layer of soft and saturated young Bay Mud which has a potential for significant consolidation and settlement under building loads. Groundwater was observed at a depth of six feet below ground surface.

The proposed project would involve onsite excavation to approximately three feet below grade for the foundation system, requiring excavation of approximately 3,400 cubic yards of soil. The building foundation would consist of grade beams on steel torque-down pipe piles that would extend approximately 80 feet into the ground. No pile driving would be required.

The Geotechnical Memorandum states that the proposed project is not located in an Alquist-Priolo Earthquake Fault zone. Additionally, there are no mapped active faults crossing the project site and there is a low risk of surface rupture that could cause damage to the proposed project. However, the proposed project would likely be exposed to strong ground shaking during an earthquake event, which may result in liquefaction, lateral spreading, or seismic ground-failure.

The Geotechnical Memorandum noted that the project site's high groundwater, liquefaction potential, and consolidation of soft, saturated Bay Mud should be addressed and provided design recommendations for the proposed structures for both static and seismic conditions that include design specifications for the EMS facility, parking garage, and torque-down pipe piles. The Geotechnical Memorandum noted that foundation design would have to address high groundwater, liquefaction of loose surficial soil, and consolidation of soft saturated young Bay Mud and provided advantages and disadvantages for various foundation alternatives.

Current construction practices are generally safer than comparable older construction practices due to improvements in building codes and construction techniques. Compliance with applicable codes and recommendations made in project-specific geotechnical analyses would not eliminate earthquake risks, but would reduce them to an acceptable level, given the seismically active characteristics of the Bay Area. The proposed project would be required to conform to the San Francisco Building Code, which ensures the safety of all new construction in the City. Decisions about appropriate foundation and structural design are considered as part of the Department of Building Inspection (DBI) permit review process. DBI would review background information including geotechnical and structural engineering reports to ensure that the security and stability of adjoining properties and the subject property is maintained during and following construction. Therefore, potential damage to structures from geologic hazards on the project site would be addressed through the DBI requirement for a geotechnical report and review of the building permit application pursuant to its implementation of the Building Code.

[29] San Francisco Public Works. *Geotechnical Memorandum.* October 20, 2015. This document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of the Case File No. 2015-011249ENV.

In light of the above, the proposed project would result in less-than-significant impacts related to seismic and geologic hazards.

Hazardous Materials

Soil and Water Contamination.

Properties throughout the City are subject to Article 22A of the Health Code, also known as the Maher Ordinance, where there is potential to encounter hazardous materials (primarily industrial zoning districts and sites with industrial uses or underground storage tanks, historic bay fill, or close proximity to freeways or underground storage tanks). The over-arching goal of the Maher Ordinance, which is administered and overseen by the Department of Public Health (DPH), is to protect public health and safety by requiring appropriate handling, treatment, disposal and when necessary, mitigation of contaminated soils that are encountered in the building construction process. The Maher Ordinance requires the project sponsor to retain the services of a qualified professional to prepare a Phase I Environmental Site Assessment (ESA) that meets the requirements of Health Code Section 22.A.6. A Phase I ESA is used to determine the potential for site contamination and level of exposure risk associated with a proposed project in a Maher area. Based on that information, the project sponsor may be required to conduct soil and/or groundwater sampling and analysis. Where such analysis reveals the presence of hazardous substances in excess of state or federal standards, the project sponsor is required to submit a site mitigation plan (SMP) to the DPH or other appropriate state or federal agency(ies), and to remediate any site contamination in accordance with an approved SMP prior to the issuance of any building permit.

Projects that disturb 50 cubic yards or more of soil that are located on sites with potentially hazardous soil or groundwater are subject to this ordinance. The proposed project, which would involve excavation of approximately 3,400 cubic yards of soil to a depth of about three feet, is on a site that is identified on the Maher Map[30] and therefore subject to the Maher Ordinance. The project sponsor has submitted a Phase I ESA documenting the project site's past uses (including as a pipe-cutting facility for the SFFD) and the potential for soil and groundwater contamination.[31] The project site is listed on eight regulatory agency databases related to the on-site use and storage of hazardous materials and disposal of hazardous wastes. Releases discovered following the removal of one 550-gallon gasoline UST, one 550-gallon diesel UST and one 100-gallon waste oil UST between 1987 and 1998 (beneath the sidewalk on Jerrold Avenue, in front of Fire Station 9) obtained regulatory case closure from DPH in October 2009. The project site has two existing 3,000-gallon USTs located inside Fire Station 9 that are in compliance with regulatory requirements. The project site is not is included on the Cortese List (Government Code Section 65962.5).

The Phase I ESA did not identify any off-site contamination that is known to have impacted the project site. However, given the proximity of commercial and industrial land use with known chemical releases in close proximity to the project site, the Phase I ESA could not rule out the possibility of subsurface soil

[30] City and County of San Francisco Planning Department. *Expanded Maher Area*, March 2015. Accessible at: http://www.sf-planning.org/ftp/files/publications_reports/library_of_cartography/Maher%20Map.pdf.

[31] Northgate Environmental Management, Inc. *Phase I Environmental Site Assessment, 2245 Jerrold Avenue, San Francisco, California*. October 6, 2015.

and groundwater contamination at the project site. As noted, the project sponsor would be required to prepare and implement a SMP under the guidance of DPH. The SMP would detail measures for the testing of contaminated soil and groundwater and, if either were encountered, proper remediation of the project site and disposal of contaminated materials such that any threat to public health or the environment would not occur. As such, the proposed project would result in less-than-significant impacts to the environment related to soil or groundwater contamination.

Hazardous Building Materials.

Because the proposed project would involve demolition of two buildings, one constructed around 1938 and one constructed in the 1950s, hazardous building materials such as polychlorinated biphenyls (PCBs), mercury, asbestos and lead-based paint are likely to be present. Demolishing the existing structure could expose workers or the community to hazardous building materials.

Removal and disposal of lead-based paints from the existing building (should it be present) prior to its demolition must comply with Chapter 34, Section 3407 of the San Francisco Building Code, Work Practices for Exterior Lead-Based Paint on Pre-1979 Buildings and Steel Structures. Chapter 34 applies to buildings for which the original construction was completed prior to 1979 (which are assumed to have lead-based paint on their surfaces), where more than ten total square feet of lead-based paint would be disturbed or removed. The Work Practices for Exterior lead-Based Paint contains performance standards, including establishment of containment barriers, at least as effective at protecting human health and the environment as those in the U.S. Department of Housing and Urban Development Guidelines (the most recent Guidelines for Evaluation and Control of Lead-Based Paint Hazards), and identifies prohibited practices that may not be used in disturbance or removal of lead-based paint.

Removal and disposal of asbestos and/or asbestos-containing materials from the existing building (should it be present) prior to its demolition must comply with Section 19827.5 of the California Health and Safety Code, which requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The BAAQMD has authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and is to be notified ten days in advance of any proposed demolition or abatement work.

Given the age of the structures to be demolished, a Hazardous Building Material report was prepared for the proposed project that documented the presence of both friable and non-friable asbestos materials, deteriorated lead-based paint, and about 20 fluorescent lights and 40 light tubes with lead sheeting and ballasts (generally assumed to contain mercury).[32] The Hazardous Building Material report provides recommendation for the safe removal and disposal of the asbestos- and lead-containing materials, and the recycling of the fluorescent light fixtures. Given these recommendations and required compliance with Section 3407 of the Building Code and Section 19827.5 of the California Health and Safety Code, there

[32] Acumen Industrial Hygiene, Inc. *Asbestos, Lead and Hazardous Building Material Survey Report for Rear Storage Sheds, San Francisco Fire Department Station #9, 2245 Jerrold Avenue, San Francisco, CAI.* November, 2015.

would be a less-than-significant impact to public health and safety and the environment with regards to hazardous building materials.

In regards to disposal of demolished materials, note that all materials removed would be transported off-site to a registered processing facility for reuse and recycling in accordance with the City's Construction and Demolition Debris Recovery Ordinance (Ordinance No. 27-06). Furthermore, the Green Building Requirements for City Buildings requires that all construction and/or demolition projects on City-owned facilities and City leaseholds prepare a Construction and Demolition Debris Management Plan that demonstrates how a minimum of 75 percent of the material will be diverted from the landfill. The plan would be prepared and approved prior to commencement of the project. Existing pavement throughout the lot may also be excavated and hauled for disposal.

For the above reasons, the proposed project would result in less-than-significant impacts related to hazardous building materials.

Cultural Resources

Archeological Resources

In regards to potential impacts to archeological resources, the proposed project would require excavation to approximately three feet below the ground surface to accommodate grade beams for the foundation system, and installation of up to 588 piles to a depth of 80 feet. The project site is not within an archeologically sensitive area as identified by the Planning Department's Geographic Information System database. A Preliminary Archeological Review (PAR) conducted for the proposed project determined that impacts to archeological resources would be unlikely with construction of the proposed project because of its location within the historic channel and wetlands of Islais Creek (as opposed to the historic shoreline, where subsurface resources might be encountered).[33] The PAR further notes that there are few historic studies of nearby sites suggesting the presence of archeological resources at the project site, and that it is unlikely there would be deeply buried prehistoric resources in the bay mud underlying the project site. Therefore, it is unlikely that the proposed project would have a significant impact to archeological resources.

Historic Architectural Resources

Because the two structures proposed for demolition are older than 50 years of age, a Historic Resource Evaluation (HRE) was prepared for the proposed project.[34] The HRE documented the project site's history, the neighborhood and historic context, the owner/occupant history, and architect/builder of the structures. The HRE determined that neither of the two structures proposed for demolition or Fire Station 9 appear eligible for listing in the California Register of Historical Resources and do not contribute to an identified California Register eligible historic district. The property is not associated with historic events and or any individuals of particular importance. Finally, the structures are not distinctive examples of a

[33] Allison Vanderslice. *Preliminary Archeological Review, 2245 Jerrold Avenue.* November 25, 2015.

[34] Carey & Co. Inc. *Historic Resource Evaluation, 2245 Jerrold Avenue, San Francisco, California*. September 9, 2015.

style, the work of a master, or architecturally significant in any other respect. In its review of the HRE, the Planning Department's Historic Preservation Team concurred with the HRE's determination that the two buildings to be demolished "are not eligible for listing in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR), and are not historic resources."[35] Therefore, the proposed project would not have a significant impact to historic architectural resources.

For the above reasons, the proposed project would not result in a significant impact to cultural resources.

PUBLIC NOTICE AND COMMENT:

On November 18, 2015, the Planning Department mailed a "Notification of Project Receiving Environmental Review" to community organizations, tenants of the affected property and properties adjacent to the project site, and those persons who own property within 300 feet of the project site. The comment period was from November 20 to December 4, 2015. Only one response to the notification was received. The response generally supported the project site as the location for the proposed project and asked to be included for any future notifications.

CONCLUSION:

The proposed project satisfies the criteria for exemption under the above-cited classification(s). In addition, none of the CEQA Guidelines Section 15300.2 exceptions to the use of a categorical exemption applies to the proposed project. For the above reasons, the proposed project is appropriately exempt from environmental review.

[35] Justin Greving, San Francisco Planning Department, *Memo Re 2015-011249ENV*. December 7, 2015.