File No. 201127 **Committee Item No.** _____
Board Item No. 32

COMMITTEE/BOARD OF SUPERVISORS

AGENDA PACKET CONTENTS LIST

Committee: _____ **Date:** _____
Board of Supervisors Meeting **Date:** November 17, 2020

Cmte Board

Cmte	Board	
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☐	☐	**Resolution**
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☐	☐	**Application**
☐	X	**Public Correspondence**

OTHER

☐	☒	Appeal Letter - 9/18/20
☐	☒	Planning Department Brief - 11/9/20
☐	☒	Project Sponsor Response - 11/6/20
☐	☒	Appellant Supplemental Info - 11/6/20
☐	☒	Public Hearing Notice - 11/3/20
☐	☒	Clerical Documents
☐	☐	
☐	☐	

Prepared by: Lisa Lew **Date:** November 13, 2020
Prepared by: _____ **Date:** _____

m | r | wolfe
& associates, p.c.
attorneys-at-law

TRANSMITTAL

TO:	FROM:
Clerk of the Board of Supervisors	M. R. Wolfe & Associates, P.C.
COMPANY:	DATE:
City and County of San Francisco	September 17, 2020
DOCUMENTS TRANSMITTED:	SENDER'S REFERENCE NUMBER:
Appeal of CEQA Exemption Determination 2019-004110ENV 2675 Geary Boulevard- Whole Foods Market	

☐ URGENT X FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☐ PLEASE RECYCLE

NOTES/COMMENTS:

Via FedEx

To the Clerk of the Board of Supervisors:

Enclosed please find an original and two copies of a letter appealing the Planning Department's September 11, 2020 "common sense" CEQA exemption determination for the above-referenced project. Also enclosed is a check for $640.00 for the Appeal Fee.

Please call this firm with any questions. Thank You.

M. R. Wolfe & Associates, P.C.
(415) 369-9400

m | r | wolfe
& associates, p.c.
attorneys-at-law

September 16, 2020

By FedEx

Clerk of the Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102

Re: Appeal to Board of Supervisors of CEQA "Common Sense" Exemption Determination 2019-004110ENV – 2675 Geary Boulevard [Whole Foods Market], Conditional Use Authorization

To the Clerk of the Board of Supervisors:

On behalf of San Francisco residents Julie Fisher and Tony Vargas, and United Food & Commercial Workers Union (UFCW) Local 5 and its members who live and/or work in San Francisco, this is to appeal the Planning Department's September 11, 2020 "common sense" CEQA exemption determination for a proposed Whole Foods Market at 2675 Geary Boulevard. Please find enclosed a copy of that exemption determination and a check for $640.00 for the appeal fee.

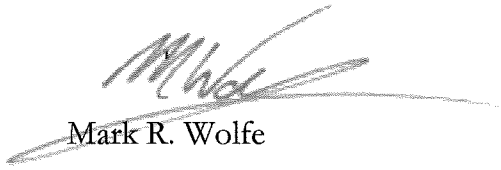
We previously appealed the Planning Commission/Department's Class 32 categorical exemption determination for this Project on July 16, 2020. That determination has apparently been rescinded and replaced by the "common sense" determination appealed now. The Clerk of the Board of Supervisors notified us by letter dated September 4, 2020, copy attached, that the earlier appeal "is no longer applicable."

The specific grounds for the current appeal are as stated in our June 24, 2020 letter to the Planning Commission, copy also attached, objecting to the previous Class 32 exemption determination. This letter sets forth the factual and legal basis for our claim that the Project is not statutorily, categorically, or otherwise exempt from CEQA. The letters also set forth our objection to the Planning Department's failure to make available for public review certain technical analyses that Department staff referenced and relied upon in making the exemption determination, which are additional grounds for the current appeal..

Thank you, and please call or email mrw@mrwolfeassociates.com with questions or concerns, or to notify us of future actions or hearings on this matter.

Most sincerely,

M. R. WOLFE & ASSOCIATES, P.C



Mark R. Wolfe

MRW:sa
cc: Environmental Review Officer
enclosures

ATTACHMENT 1

ATTACHMENT 1

ATTACHMENT 1

ATTACHMENT 1

ATTACHMENT 1

ATTACHMENT 1

San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
www.sfplanning.org

CEQA COMMON SENSE EXEMPTION DETERMINATION

Property Information/Project Description

Project Address	Block/Lot(s)
2675 Geary Boulevard	1094001
Case No.	**Permit No.**
2019-004110ENV	

☒ **Addition Alteration** ☐ **Demolition** (requires HRE for Category B Building) ☐ **New Construction**

Project Description

The project sponsor (Whole Foods Market) proposes a new grocery store, restaurant, and coffee bar at the "City Center" an existing shopping center located at the southeast corner of Masonic Avenue and Geary Boulevard, in the Western Addition Neighborhood of San Francisco (Assessor's Block 1094, Lot 001). Whole Foods Market would occupy a vacant retail space, formerly occupied by Best Buy, above the existing Target store. The proposed project would include a 49,780-square-foot grocery store, a 3,320-square-foot restaurant, and a 1,190-square-foot coffee shop. The existing Lot C (117 parking spaces) would be available for Whole Foods customers. Loading and deliveries would occur from an existing 3,528-square-foot loading dock which is accessed from O'Farrell Street just east of Anza Vista Avenue. No changes to vehicle parking, bicycle parking, loading, driveway access, or onsite circulation are proposed. In addition, no changes are proposed in the public right-of way. The project would not require excavation or exterior construction.

STEP 1: EXEMPTION DETERMINATION

The project has been determined to be exempt under the California Environmental Quality Act (CEQA).

☒ **Common Sense Exemption (CEQA Guidelines section 15061(b)(3)**

STEP 2: CEQA Impacts

To Be Completed By Project Planner

If any box is checked below, a Project *Application* is required.

☐ **Air Quality:** Would the project add new sensitive receptors (specifically, schools, day care facilities, hospitals, residential dwellings, and senior-care facilities within an Air Pollution Exposure Zone? Does the project have the potential to emit substantial pollutant concentrations (e.g., backup diesel generators, heavy industry, diesel trucks, etc.)? *(refer to EP_ArcMap > CEQA Catex Determination Layers > Air Pollution Exposure Zone)*

☐ **Hazardous Materials:** If the project site is located on the Maher map or is suspected of containing hazardous materials (based on a previous use such as gas station, auto repair, dry cleaners, or heavy manufacturing, or a site with underground storage tanks): Would the project involve 50 cubic yards or more of soil disturbance - or a change of use from industrial to residential? If the applicant presents documentation of enrollment in the San Francisco Department of Public Health (DPH) Maher program, a DPH waiver from the Maher program, or other documentation from Environmental Planning staff that hazardous material effects would be less than significant (refer to EP_ArcMap > Maher layer).

☐ **Transportation**: Does the project involve a childcare facility or school with 30 or more students, or a location 1,500 sq. ft. or greater? Does the project have the potential to adversely affect transit, pedestrian and/or bicycle safety (hazards) or the adequacy of nearby transit, pedestrian and/or bicycle facilities?

☐ **Archeological Resources:** Would the project result in soil disturbance/modification greater than two (2) feet below grade in an archeological sensitive area or eight (8) feet in a non-archeological sensitive area? If yes, archeo review is required. *(refer to EP_ArcMap > CEQA Catex Determination Layers > Archeological Sensitive Area)*

☐ **Subdivision/Lot Line Adjustment:** Does the project site involve a subdivision or lot line adjustment on a lot with a slope average of 20% or more? *(refer to EP_ArcMap > CEQA Catex Determination Layers > Topography)* If yes, Environmental Planning must issue the exemption.

☐ **Slope = or > 25%:** Does the project involve any of the following: (1) square footage expansion greater than 500 sq. ft. outside of the existing building footprint, (2) excavation of 50 cubic yards or more of soil, (3) new construction? *(refer to EP_ArcMap > CEQA Catex Determination Layers > Topography)* **If box is checked, a geotechnical report is required and Environmental Planning must issue the exemption.**

☐ **Seismic: Landslide Zone:** Does the project involve any of the following: (1) square footage expansion greater than 500 sq. ft. outside of the existing building footprint, (2) excavation of 50 cubic yards or more of soil, (3) new construction? *(refer to EP_ArcMap > CEQA Catex Determination Layers > Seismic Hazard Zones)* **If box is checked, a geotechnical report is required and Environmental Planning must issue the exemption.**

☐ **Seismic: Liquefaction Zone:** Does the project involve any of the following: (1) square footage expansion greater than 500 sq. ft. outside of the existing building footprint, (2) excavation of 50 cubic yards or more of soil, (3) new construction? *(refer to EP_ArcMap > CEQA Catex Determination Layers > Seismic Hazard Zones)* **If box is checked, a geotechnical report will likely be required and Environmental Planning must issue the exemption.**

Comments and Planner Signature (*optional*):
PLEASE SEE ATTACHED

STEP 3: Property Status - Historic Resource

To Be Completed By Project Planner

PROPERTY IS ONE OF THE FOLLOWING: (*refer to Parcel Information Map*)	
☐	**Category A:** Known Historical Resource. GO TO STEP 5.
☐	**Category B:** Potential Historical Resource (over 45 years of age). GO TO STEP 4.
☒	**Category C:** Not a Historical Resource or Not Age Eligible (under 45 years of age). GO TO STEP 6.

STEP 4: Proposed Work Checklist

To Be Completed By Project Planner

Check all that apply to the project.	
☐	**1. Change of use and new construction.** Tenant improvements not included.
☐	**2. Regular maintenance or repair** to correct or repair deterioration, decay, or damage to building.
☐	**3. Window replacement** that meets the Department's *Window Replacement Standards*. Does not include storefront window alterations.
☐	**4. Garage work.** A new opening that meets the *Guidelines for Adding Garages and Curb Cuts*, and/or replacement of a garage door in an existing opening that meets the Residential Design Guidelines.
☐	**5. Deck, terrace construction, or fences** not visible from any immediately adjacent public right-of-way.
☐	**6. Mechanical equipment installation** that is not visible from any immediately adjacent public right-of-way.
☐	**7. Dormer installation** that meets the requirements for exemption from public notification under *Zoning Administrator Bulletin No. 3: Dormer Windows*.
☐	**8. Addition(s)** that are not visible from any immediately adjacent public right-of-way for 150 feet in each direction; does not extend vertically beyond the floor level of the top story of the structure or is only a single story in height; does not have a footprint that is more than 50% larger than that of the original building; and does not cause the removal of architectural significant roofing features.
Note: Project Planner must check box below before proceeding.	
☐	Project is not listed. GO TO STEP 5.
☐	Project does not conform to the scopes of work. GO TO STEP 5.
☐	Project involves four or more work descriptions. GO TO STEP 5.
☐	Project involves less than four work descriptions. GO TO STEP 6.

STEP 5: CEQA Impacts - Advanced Historical Review

To Be Completed By Project Planner

Check all that apply to the project.

☐ **1.** Project involves a **known historical resource (CEQA Category A)** as determined by Step 3 and conforms entirely to proposed work checklist in Step 4.

☐ **2. Interior alterations to publicly accessible spaces.**

☐ **3. Window replacement** of original/historic windows that are not "in-kind" but are consistent with existing historic character.

☐ **4. Façade/storefront alterations** that do not remove, alter, or obscure character-defining features.

☐ **5. Raising the building** in a manner that does not remove, alter, or obscure character-defining features.

☐ **6. Restoration** based upon documented evidence of a building's historic condition, such as historic photographs, plans, physical evidence, or similar buildings.

☐ **7. Addition(s)**, including mechanical equipment that are minimally visible from a public right-of-way and meet the *Secretary of the Interior's Standards for Rehabilitation.*

☐ **8. Other work consistent** with the Secretary of the Interior Standards for the Treatment of Historic Properties (specify or add comments):

☐ **9. Other work** that would not materially impair a historic district (specify or add comments):

(Requires approval by Senior Preservation Planner/Preservation Coordinator)

☐ **10. Reclassification of property status.** (Requires approval by Senior Preservation Planner/Preservation

☐ Reclassify to Category A
a. Per HRER dated
b. Other (specify):

☐ Reclassify to Category C
(attach HRER)

Note: If ANY box in STEP 5 above is checked, a Preservation Planner MUST check one box below.

☐ **Project can proceed with categorical exemption review.** The project has been reviewed by the Preservation Planner and can proceed with categorical exemption review. GO TO STEP 6.

Comments (*optional*):

Preservation Planner Signature:

STEP 6: Exemption Determination To Be Completed By Project Planner

☒ **No further environmental review is required. The project is exempt under CEQA. It can be seen with certainty that there is no possibility that the project may have a significant effect on the environment.**

Project Approval Action: Planning Commission issuance of a Conditional Use Authorization, which occurred on June 25, 2020

If Discretionary Review before the Planning Commission is requested, the Discretionary Review hearing is the Approval Action for the project.	**Signature:** *Rachel Schuett*

Once signed or stamped and dated, this document constitutes a categorical exemption pursuant to CEQA Guidelines and Chapter 31of the Administrative Code.

In accordance with Chapter 31 of the San Francisco Administrative Code, an appeal of an exemption determination can only be filed within 30 days of the project receiving the first approval action. Please note that other approval actions may be required for the project. Please contact the assigned planner for these approvals.

STEP 7: Modification of a CEQA Exempt Project

To Be Completed By Project Planner

In accordance with Chapter 31 of the San Francisco Administrative Code, when a California Environmental Quality Act (CEQA) exempt project changes after the Approval Action and requires a subsequent approval, the Environmental Review Officer (or his or her designee) must determine whether the proposed change constitutes a substantial modification of that project. This checklist shall be used to determine whether the proposed changes to the approved project would constitute a "substantial modification" and, therefore, be

Modified Project Description:

DETERMINATION IF PROJECT CONSTITUTES SUBSTANTIAL MODIFICATION

Compared to the approved project, would the modified project:

☐ Result in expansion of the building envelope, as defined in the Planning Code;

☐ Result in the change of use that would require public notice under Planning Code Sections 311;

☐ Result in demolition as defined under Planning Code Section 317 or 19005(f)?

☐ Is any information being presented that was not known and could not have been known at the time of the original determination, that shows the originally approved project may no longer qualify for the exemption?

If at least one of the above boxes is checked, further environmental review is required.

DETERMINATION OF NO SUBSTANTIAL MODIFICATION

☐ The proposed modification would not result in any of the above changes.

If this box is checked, the proposed modifications are categorically exempt under CEQA, in accordance with prior project approval and no additional environmental review is required. This determination shall be posted on the Planning Department website and office and mailed to the applicant, City approving entities, and anyone requesting written notice.

Planner Name:	**Signature or Stamp:**

CEQA IMPACTS

Historic Resources: The Planning Department prepared a Historic Resource Evaluation Response (HRER) on August 4, 2011. The HRER concluded that the no historic resource was present. The department's Neighborhood Storefront Commercial Building Survey did not identify this property as significant for the purpose of the survey. The Modern Context statement did call out this property but did not raise new information that would change the previous determination in the HRER.

Hazardous Materials: The project site is on the Cortese List due to prior leaking underground storage tank. However, the case is closed, and the project would result in no excavation. No significant hazardous materials impacts would occur.

Transportation: The department's transportation staff reviewed the proposed project on June 10, 2019 and determined that further transportation review was required. Planning department staff prepared a transportation memo (May 4, 2020) and determined that the proposed project would not result in significant transportation-related impacts. Further, the project would still meet the loading demand and no significant loading impacts would occur even if the project would result in three times as many truck trips than estimated in the transportation memo.

Noise: The project would not include exterior construction activities. The project would not generate sufficient vehicle trips to noticeably increase ambient noise levels, and the project's fixed noise sources, such as heating, ventilation, and air conditioning systems, would be subject to noise limits in Article 29 of the Police Code (section 2909, Noise Limits). No significant noise impacts would occur.

Air Quality: The project would not include exterior construction activities. The proposed land uses are below the Bay Area Air Quality Management District's construction and operational screening levels for requiring further quantitative criteria air pollutant analysis. The project site is located within an air pollutant exposure zone but would not introduce new sensitive receptors or substantial sources of pollutant concentrations. For example, truck drivers would not be idling the entire time the truck is present (or dwelling) as the truck drivers would be subject to, and would have to comply with, California regulations limiting idling ((California Code of Regulations, Title 13, Division 3, § 2485). In addition, the Bay Area Air Quality Management District identifies "Minor Low Impact Sources" as roads with less than 10,000 total vehicles/day and less than 1,000 trucks per day, which this project is resulting substantially less vehicles and trucks than that. Lastly, the project's loading dock is more than 150 feet away from the nearest sensitive receptor. No significant air quality impacts would occur.

Water Quality: The project would not require excavation or exterior construction activities. Stormwater and wastewater discharged from the project site during operations would flow to the City's combined sewer system and would be treated to the standards in the City's National Pollution Discharge Elimination System permit. No significant water quality impacts would occur.

Natural Habitat: The project site is paved and within a developed urban area. The project site has no significant riparian corridors, estuaries, marshes, wetlands, or any other potential wildlife habitat that might contain endangered, rare or threatened species. Thus, the project site has no value as habitat for rare, threatened, or endangered species.

Public Notice: A "Notification of Project Receiving Environmental Review" was mailed on February 21, 2020 to adjacent occupants and owners of buildings within 300 feet of the project site and to the Western Addition neighborhood group list. Further correspondence regarding environmental effects were received prior June 25, 2020 Planning Commission hearing. Comments are addressed herein.

Attachment 2

BOARD of SUPERVISORS

City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco 94102-4689
Tel. No. 554-5184
Fax No. 554-5163
TDD/TTY No. 554-5227

September 4, 2020

Mark Wolfe
M. R. Wolfe & Associates, P.C.
580 California Street, Suite 1200
San Francisco, CA 94104

Subject: File No. 200899 - Appeal of California Environmental Quality Act (CEQA) Determination of Exemption from Environmental Review - 2675 Geary Boulevard Project

Dear Mr. Wolfe:

The Office of the Clerk of the Board is in receipt of a memorandum dated September 2, 2020, from the Planning Department regarding their determination on the timely filing of appeal of the Categorical Exemption Determination issued by the Planning Department under CEQA for the proposed project at 2675 Geary Boulevard. In their determination, the Planning Department communicated that the Categorical Exemption issued on May 14, 2020, was rescinded on September 2, 2020.

Given that the subject Exemption Determination was rescinded by the Planning Department, the appeal you filed with our office on July 17, 2020, is no longer applicable. The appeal hearing will not be noticed or agendized for a Board meeting. Enclosed please find your filing fee check in the amount of $640.

If you have any questions, please feel free to contact Legislative Clerks Lisa Lew at (415) 554-7718, Jocelyn Wong at (415) 554-7702, or Brent Jalipa at (415) 554 7712.

Very truly yours,

Angela Calvillo
Clerk of the Board

jw:ll:ams

c: Anne Pearson, Deputy City Attorney
Kate Stacy, Deputy City Attorney
Kristen Jensen, Deputy City Attorney
Rich Hillis, Director, Planning Department
Corey Teague, Zoning Administrator, Planning Department
Scott Sanchez, Acting Deputy Zoning Administrator, Planning Department
Lisa Gibson, Environmental Review Officer, Planning Department
Devyani Jain, Deputy Environmental Review Officer, Planning Department
Joy Navarette, Environmental Planning, Planning Department
Don Lewis, Environmental Planning, Planning Department
Adam Varat, Acting Director of Citywide Planning, Planning Department
Dan Sider, Director of Executive Programs, Planning Department
Aaron Starr, Manager of Legislative Affairs, Planning Department
AnMarie Rodgers, Director of Citywide Planning, Planning Department
Jonas Ionin, Planning Commission Secretary, Planning Department
Laura Lynch, Staff Contact, Planning Department
Rachel Schuett, Staff Contact, Planning Department
Christopher May, Staff Contact, Planning Department
Wade Wietgrefe, Staff Contact, Planning Department
Julie Rosenberg, Executive Director, Board of Appeals
Katy Sullivan, Legal Assistant, Board of Appeals
Alec Longaway, Legal Process Clerk, Board of Appeals

San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
www.sfplanning.org

CATEGORICAL EXEMPTION APPEAL

2675 Geary Boulevard

September 2, 2020

To:	Angela Calvillo, Clerk of the Board of Supervisors
From:	Lisa Gibson, Environmental Review Officer, lisa.gibson@sfgov.org Wade Wietgrefe, Principal Planner, wade.wietgrefe@sfgov.org Rachel Schuett, Senior Planner, rachel.schuett@sfgov.org
RE:	Board File No. TBD, Planning Case no. 2019-004110ENV, 2675 Geary Boulevard (Whole Foods change of use)
Project Sponsor:	Chloe V. Angelis, cangelis@reubenlaw.com
Appellant:	Mark R. Wolfe, mrw@mrwolfeassociates.com

Class 32 Categorical Exemption Rescinded and Appeal is Moot

On July 16, 2020, M.R. Wolfe & Associates, P.C. on behalf of others (Appellant) filed an appeal with the Office of the Clerk of the Board of Supervisors (clerk) of the Planning Department's May 14, 2020 categorical exemption determination for the 2675 Geary Boulevard project.

On August 3, 2020, the Planning Department informed the clerk's office that the appeal was timely.

The Planning Department is rescinding the May 14, 2020 categorical exemption determination. Therefore, the CEQA appeal filed by the appellant is moot, the appeal is no longer timely, and we request the clerk's office to not schedule any appeal hearings before the board of supervisors on this rescinded categorical exemption.

Next Steps

The Planning Department will remove the rescinded categorical exemption from its website and electronic file system and will issue a new environmental determination. The appellant and any other interested parties will have additional opportunities to appeal the new environmental determination, if they desire, pursuant to the processes identified in Chapter 31 of the San Francisco Administrative Code.

Attachment 3

m | r | wolfe
& associates, p.c.
attorneys-at-law

June 24, 2020

By E-Mail

Joel Koppel, President
Members of the Planning Commission
City and County of San Francisco
c/o Jonas Ionin, Commission Secretary
1650 Mission Street, Suite 400
San Francisco, CA 94103
Jonas.ionin@sfgov.org
commissions.secretary@sfgov.org

Re: 2019-004110CUA – 2675 Geary Boulevard [Whole Foods Market]
Request for Conditional Use Authorization

Dear President Koppel and Planning Commissioners:

On behalf of San Francisco residents Julie Fisher and Tony Vargas, and United Food & Commercial Workers Union (UFCW) Local 5 and its members who live and/or work in San Francisco, please accept and consider the following comments and concerns regarding the above-referenced matter, a request for conditional use authorization to permit formula retail use by Whole Foods Market ("Project"). As described in this letter, the Project does not qualify for the Class 32 categorical exempt from environmental review under CEQA.

Preliminarily, we respectfully object to the non-provision of documents cited and relied upon in the staff report to support the proposed finding of categorical exemption from CEQA. Specifically, the categorical exemption determination states that "Planning department staff prepared a transportation memo (May 4, 2020) and determined that the proposed project would not result in transportation-related impacts." The referenced "Transportation Coordination Memo" lists six attachments at the end that it cites. On June 3, we emailed Planning Staff to request several of these attachments. We repeated the request for these materials, plus an additional item referenced in the May 4 memo, on June 15. *See* copies of emails, attached. Staff provided one of the attachments, the Project plans, on June 22, but as of the above date has not supplied the remainder. Because these attachments contain information

expressly cited and relied upon by the May 4 Transportation Coordination Memo, they are material to any meaningful public review of the evidentiary basis for the claim of CEQA exemption. Unless and until these items are provided to the public for scrutiny, the Planning Commission may not lawfully approve the Project based on the claimed categorical exemption. The following points are therefore submitted under protest, with all rights reserved.

I. Traffic

A. Freight loading

The City concludes that freight loading impacts would be less than significant based on the availability of two loading docks. This conclusion is based on the projection that the total time that the loading docks be in use would be 8 hours per day (sixteen hours of "dwell" time unloading, divided by two loading docks.) This analysis suffers from several flaws.

For example, the analysis assumes that the number of daily deliveries for this 49,780 square foot Whole Foods store will be less than or equal to the deliveries for the 15,000 square foot Whole Foods store at 1765 California Street. That is, the analysis assumes that Whole Foods expects its business volume per retail square foot for the new store will be less than one-third the volume of its 1765 California Street store. This extraordinary assumption is purportedly justified by several questionable claims. First, the Transportation Coordination Memo claims the smaller store "has been in operations for years now and therefore has a customer base that is used to going to that store." While that logic may apply during a start-up period for the new store, it is not a reasonable long-term assumption. Presumably Whole Foods would not open a store that it did not expect to generate a sizable customer base. Second, the Transportation Coordination Memo claims that population density near the smaller store is "nearly twice that of the immediate vicinity near 2675 Geary." Even if the store volume were directly proportional to population density in the immediate vicinity, the fact that the new store area's population density is only half that of the exiting store does not justify the assumption that its sales volumes will be only one-third as high. Customers will obviously drive to the store from outside the immediate vicinity to shop there.

Third, the Transportation Coordination Memo admits that the number of Stock Keeping Units (SKUs) at a store directly affects the number of vendors and deliveries needed for the store." It therefore strains credulity that Whole Foods would open a new store three times larger than its California Street store, but stock it with fewer SKUs. If the number of deliveries per day or per week is determined even in part by the number of SKUs, then the assumption that deliveries are determined

only by population density and/or the established customer base is invalid. Fourth, the Transportation Coordination Memo assumes without evidence or analysis that all deliveries will be spread evenly over a 24-hour day, apparently based on the assumption that the City Center shopping center does not have time restrictions on deliveries. However, nothing would prevent a situation where 3 of the 28 daily deliveries arrived during the same unloading period, in which case the two loading docks would not be sufficient. Without a condition to limit more than two simultaneous deliveries, there will certainly be instances where two loading docks will not be enough; and if as is likely the actual delivery trips will be greater than the 28 trips assumed, this will be a frequent occurrence.

B. Construction traffic

The Transportation Coordination Memo assumes there would be no impacts from construction traffic because there would be no exterior construction. However, substantial interior construction would be required to transform a retail electronics store into a supermarket. This activity would generate construction traffic that would interfere with existing City Center operations and with traffic in adjacent streets.

II. Toxic Air Contaminants

Toxic air contaminants (TACs) are airborne substances that are capable of causing short-term (acute) and/or long-term (chronic or carcinogenic, i.e., cancer-causing) adverse human health effects (i.e., injury or illness). TACs include both organic and inorganic chemical substances. They may be emitted from a variety of common sources including gasoline stations, automobiles, dry cleaners, industrial operations, and painting operations. The current California list of TACs includes more than 200 compounds, including particulate emissions from diesel-fueled engines.

The Californian Air Resources Board ("CARB") has long identified diesel particulate matter ("DPM") as a toxic air contaminant.[1] DPM differs from other TACs in that it is not a single substance but rather a complex mixture of hundreds of substances produced when an engine burns diesel fuel. DPM is a concern because it causes lung cancer; many compounds found in diesel exhaust are carcinogenic. DPM includes the particle-phase constituents in diesel exhaust. The chemical composition

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1 CARB, Executive Summary For the "Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant," Prepared by the Staff of the Air Resources Board and the Office of Environmental Health Hazard Assessment, As Approved by the Scientific Review Panel on April 22, 1998, available at https://oehha.ca.gov/media/downloads/air/document/diesel20exhaust.pdf.

and particle sizes of DPM vary between different engine types (heavy-duty, light-duty), engine operating conditions (idle, accelerate, decelerate), fuel formulations (high/low sulfur fuel), and the year of the engine. Some short-term (acute) effects of diesel exhaust include eye, nose, throat, and lung irritation, and diesel exhaust can cause coughs, headaches, light-headedness, and nausea. DPM poses the greatest health risk among the TACs. Almost all diesel exhaust particle mass is 10 microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.

A. The Project would generate toxic air contaminants from diesel delivery vehicles that would expose nearby sensitive receptors to TACs.

The Project would provide two loading docks for delivery vehicles to support a 49,780 square-foot supermarket.[2] The City assumes that this will generate 4 daily deliveries from 65-foot trucks and 4 daily deliveries from 30-48 foot trucks.[3] These trucks would be diesel-powered. In addition, the City assumes that up to 20 additional daily deliveries would be made by other vehicles, which include "bobtail trucks and large or small vans."[4] Some number of these delivery vehicles may also be diesel-powered. The City estimates that the large trucks would dwell on-site for an hour and the smaller trucks would dwell for half an hour.[5] Thus, trucks that may emit DPM would be on-site for 13.5 hours per day.[6]

The Project site at 2675 Geary Boulevard is within an Air Pollution Exposure Zone ("APEZ").[7] The Project's directly adjacent neighbor at 100 Masonic Street, the Epiphany Center/Mount St. Joseph-St. Elizabeth, is also within the APEZ.[8] The Epiphany Center provides "holistic client-centered care to a diverse population of children, women, and families who are the most vulnerable in our society."[9] The Epiphany Center provides both residential programs and various parent-child programs.[10] Thus, the Project would contribute TACs that would affect adjacent sensitive receptors also located in the APEZ. In addition, there are sensitive receptors located directly across O'Farrell Street from the Project site, including residential uses and the Wallenberg School.

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2 Rachel Schuett, Transportation Planner, Transportation Coordination Memo, May 4, 2020.
3 *Id.*, Table 2.
4 *Id.*
5 Transportation Coordination Memo, May 4, 2020.
6 *Id.*
7 San Francisco Property Information Map, search for 2675 Geary Blvd, visited June 18, 2020, available at https://sfplanninggis.org/PIM/.
8 *Id.*
9 Epiphany Center website, visited June 18, 2020, available at https://www.theepiphanycenter.org/who-we-are/mission-values/.)
10 *Id.*

III. The Project does not qualify for any categorical exemption from CEQA.

Under CEQA Guidelines Section 15332, the Class 32 infill exemption does not apply under its own terms if there is substantial evidence that a project would cause significant impacts to traffic, noise, air quality, or water quality.[11] As discussed above, there is substantial evidence here that air quality impacts would be significant due to toxic air contaminants from diesel delivery vehicles. The Project would generate TACs that would adversely affect adjacent sensitive receptors. Based on the numbers of diesel deliveries and TRUs, it is likely that the TACs would exceed BAAQMD's significance thresholds for a significant impact from a single source, which is 10 excess cancers or an increase in PM2.5 concentrations of 0.3ug/m3.[12] The project would certainly exceed the BAAQMD thresholds for significant cumulative impacts.

Furthermore, even if the Class 32 or any other categorical exemption applied, it would still be inapplicable because two of the exceptions to categorical exemptions set out in CEQA Guidelines Section 15300.2 preclude reliance on the exemption. Under Section 15300.2(c), a categorical exemption is inapplicable if "there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances." As discussed above, the Project would bring diesel delivery vehicle emissions into an area containing sensitive receptors. And this area is known to have an existing significant cumulative TAC exposure. These are unusual circumstances. Furthermore, the introduction of this additional TAC emission source creates a reasonable probability of a significant effect.

Finally, under Section 15300.2(b) a categorical exemption is inapplicable if "the cumulative impact of successive projects of the same type in the same place, over time is significant." The project and its neighbors are located in an area that both BAAQMD and the City have already designated as significantly impacted by cumulative toxic air contaminants. The basis of that designation is the emissions from successive development projects that require diesel-powered vehicles for delivery, access, and public transportation. BAAQMD provides that any additional contribution from this Project must be considered significant because its thresholds for cumulative TAC impacts are exceeded by the cumulative emission sources.

In conclusion, for the above reasons the Project does not qualify for any categorical exemption from CEQA. The City should proceed to prepare an initial study in accordance with Guidelines Section 15063 before taking any action to

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11 *Banker's Hill, Hillcrest, Park West Community Preservation Group v. City of San Diego* (2006) 139 Cal.App.4th 249, 267–269.

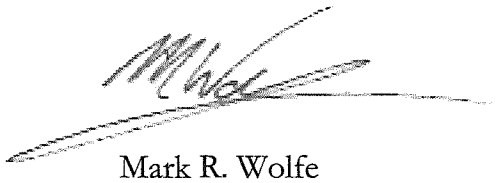
12 BAAQMD, CEQA Guidelines 2017, p. 2-5.

approve the Project. The Planning Commission should accordingly DENY the conditional use authorization at this time.

Thank you for your consideration of these concerns.

Most sincerely,

M. R. WOLFE & ASSOCIATES, P.C



Mark R. Wolfe
On behalf of Julie Fisher, Tony Vargas, and
UFCW Local 5

MRW:sa
attachment

ATTACHMENT 1

ATTACHMENT 1

ATTACHMENT 1

ATTACHMENT 1

ATTACHMENT 1

ATTACHMENT 1

From: **Mark Wolfe** mrw@mrwolfeassociates.com
Subject: Re: Transportation Memo for 2019-004110CUA | 2675 Geary Blvd. Whole Foods
Date: June 23, 2020 at 7:57 AM
To: Schuett, Rachel (CPC) rachel.schuett@sfgov.org
Cc: Wietgrefe, Wade (CPC) wade.wietgrefe@sfgov.org, May, Christopher (CPC) christopher.may@sfgov.org

Rachel,

Thanks for sending the Plans, which I received and downloaded.

Any sense of when we might be able to see the remainder of the materials (listed again below)?

- the "Kittleson & Associates 1600 Jackson Street Loading Analysis Memo," April 19, 2018. referenced footnores 4 and 5 of the May 4, 2020 "Transportation Coordination Memo."
- Attachment 1 to the May 4, 2020 "Transportation Coordination Memo," identified as "Attachment 1: Plans dated May 15, 2019."
- Attachment 5 to the May 4, 2020 "Transportation Coordination Memo," identified as "Attachment5: Lot E Loading Dock Exhibit"
- Exhibit B to Attachment 6 to the May 4, 2020 "Transportation Coordination Memo." Attachment 6 is the "Loading Information Request" response dated August 13, 2019. Its Exhibit B is identified as "loading dock exhibit for Lot E, attached as Exhibit B." This may be the same document as the document requested in the previous item.
- The email from Don Lewis dated July 1, 2019 requesting certain information regarding freight loading operations for the proposed Whole Foods Market, which is referenced in Attachment 6 to the to the May 4, 2020 "Transportation Coordination Memo."
- the "commercial loading estimates by vehicle type collected for similar Whole Foods Market in San Francisco as collected for the 1600 Jackson Street transportation study," as referenced in the "Transportation Study Scope of Work Checklist, Record No. 2019-004110ENV, 2675 Geary Blvd," dated August 28, 2019.
- the "1600 Jackson Street transportation study," as referenced in the "Transportation Study Scope of Work Checklist, Record No. 2019-004110ENV, 2675 Geary Blvd," dated August 28, 2019.

On Jun 17, 2020, at 3:48 PM, Schuett, Rachel (CPC) <rachel.schuett@sfgov.org> wrote:

Hi Mark,

I will get you the requested documents by Monday (6/22).

Best,
Rachel

Rachel A. Schuett (she/her/hers)
Senior Environmental Planner
Environmental Planning Division
San Francisco Planning Department
1650 Mission Street, San Francisco, CA 94103
www.sfplanning.org
Direct: (415) 575-9030

From: Wietgrefe, Wade (CPC) <wade.wietgrefe@sfgov.org>
Sent: Tuesday, June 16, 2020 9:54 AM
To: Mark Wolfe <mrw@mrwolfeassociates.com>
Cc: Schuett, Rachel (CPC) <rachel.schuett@sfgov.org>; May, Christopher (CPC) <christopher.may@sfgov.org>
Subject: Re: Transportation Memo for 2019-004110CUA | 2675 Geary Blvd. Whole Foods

Hi Mark,
I'm coordinating with Rachel tomorrow on this request.
Thank you for your patience,

Wade Wietgrefe, AICP, Principal Planner
Environmental Planning Division
San Francisco Planning Department
1650 Mission Street, Suite 400 San Francisco, CA 94103
Direct: 415.575.9050 | www.sfplanning.org
San Francisco Property Information Map

From: Mark Wolfe <mrw@mrwolfeassociates.com>

Sent: Monday, June 15, 2020 11:53 AM
To: Wietgrefe, Wade (CPC) <wade.wietgrefe@sfgov.org>
Cc: May, Christopher (CPC) <christopher.may@sfgov.org>; Schuett, Rachel (CPC) <rachel.schuett@sfgov.org>
Subject: Re: Transportation Memo for 2019-004110CUA | 2675 Geary Blvd. Whole Foods

Hi Wade,

Just following up to see if we might get these additional materials a decent amount of time in advance of 6/25.

There's one more item I realized I omitted from the list:

- the "Kittleson & Associates 1600 Jackson Street Loading Analysis Memo," April 19, 2018. referenced footnores 4 and 5 of the May 4, 2020 "Transportation Coordination Memo."

And below, again, are the items referenced in the Transportation Memo that we have asked for:

- Attachment 1 to the May 4, 2020 "Transportation Coordination Memo," identified as "Attachment 1: Plans dated May 15, 2019."
- Attachment 5 to the May 4, 2020 "Transportation Coordination Memo," identified as "Attachment5: Lot E Loading Dock Exhibit"
- Exhibit B to Attachment 6 to the May 4, 2020 "Transportation Coordination Memo." Attachment 6 is the "Loading Information Request" response dated August 13, 2019. Its Exhibit B is Identified as "loading dock exhibit for Lot E, attached as Exhibit B." This may be the same document as the document requested in the previous item.
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- the "1600 Jackson Street transportation study," as referenced in the "Transportation Study Scope of Work Checklist, Record No. 2019-004110ENV, 2675 Geary Blvd," dated August 28, 2019.

Thanks again,

Mark Wolfe

On June 2, 2020, at 1:08 PM, Mark Wolfe <mrw@mrwolfeassociates.com> wrote:

Wade

Thanks very much for what you provided. Appreciated.

We'd still like to see some of the other attachments to the "Transportation Coordination Memo" for the Project. Specifically:
- Attachment 1 to the May 4, 2020 "Transportation Coordination Memo," identified as "Attachment 1: Plans dated May 15, 2019."
- Attachment 5 to the May 4, 2020 "Transportation Coordination Memo," identified as "Attachment5: Lot E Loading Dock Exhibit"
- Exhibit B to Attachment 6 to the May 4, 2020 "Transportation Coordination Memo." Attachment 6 is the "Loading Information Request" response dated August 13, 2019. Its Exhibit B is Identified as "loading dock exhibit for Lot E, attached as Exhibit B." This may be the same document as the document requested in the previous item.
- The email from Don Lewis dated July 1, 2019 requesting certain information regarding freight loading operations for the proposed Whole Foods Market, which is referenced in Attachment 6 to the to the May 4, 2020 "Transportation Coordination Memo."
- the "commercial loading estimates by vehicle type collected for similar Whole Foods Market in San Francisco as collected for the 1600 Jackson Street transportation study," as referenced in the "Transportation Study Scope of Work Checklist, Record No. 2019-004110ENV, 2675 Geary Blvd," dated August 28, 2019.
- the "1600 Jackson Street transportation study," as referenced in the "Transportation Study Scope of Work Checklist, Record No. 2019-004110ENV, 2675 Geary Blvd," dated August 28, 2019.

I understand it may take some time, which is me, but hopefully we can get them sufficiently in advance of the next Planning Commission hearing (6/25?) to have a chance to review them.

Thanks again.

Mark Wolfe

wade.wietgrefe@sfgov.org

christopher.may@sfgov.org

mrw@mrwolfeassociates.com
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2323

M. R. Wolfe & Associates, P.C.
555 Sutter Street, Suite 405
San Francisco, CA 94102
Tel: (415) 369-9400

Wells Fargo Bank, N.A.

11-4288/1210

9/22/2020

PAY TO THE ORDER OF **San Francisco Planning Department**

$ **640.00

Six Hundred Forty and 00/100********DOLLARS

San Francisco Planning Department
c/o Clerk of BOS
1 Dr. Carlton B. Goodlett Pl., Room 244
San Francisco, CA 94102

MEMO **Appeal Fee - 2019-004110CUA ENV**

AUTHORIZED SIGNATURE

Security features. Details on back.

[redacted]

2328

M. R. Wolfe & Associates, P.C.
555 Sutter Street, Suite 405
San Francisco, CA 94102
Tel: (415) 369-9400

Wells Fargo Bank, N.A.

11-4288/1210

9/21/2020

PAY TO THE ORDER OF San Francisco Planning Department

$ **25.00

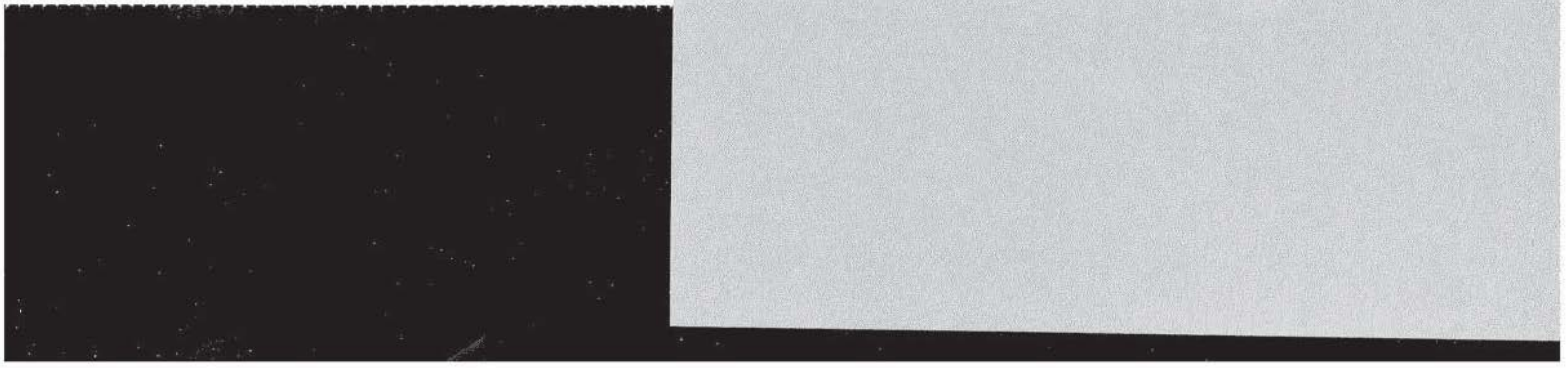
Twenty-Five and 00/100********** DOLLARS

Security features. Details on back.

San Francisco Planning Department
c/o Clerk of BOS
1 Dr. Carlton B. Goodlett Pl., Room 244
San Francisco, CA 94102

MEMO Balance due for Appeal 2019-004110ENV

⑈002328⑈ ⑆121042



From:	BOS Legislation, (BOS)
To:	Mark Wolfe; mloper@reubenlaw.com; cangelis@reubenlaw.com
Cc:	PEARSON, ANNE (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); RUIZ-ESQUIDE, ANDREA (CAT); Hillis, Rich (CPC); Teague, Corey (CPC); Sanchez, Scott (CPC); Gibson, Lisa (CPC); Jain, Devyani (CPC); Navarrete, Joy (CPC); Lewis, Don (CPC); Varat, Adam (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Ionin, Jonas (CPC); Schuett, Rachel (CPC); May, Christopher (CPC); Wietgrefe, Wade (CPC); Range, Jessica (CPC); Rosenberg, Julie (BOA); Sullivan, Katy (BOA); Longaway, Alec (BOA); BOS-Supervisors; BOS-Legislative Aides; Calvillo, Angela (BOS); Somera, Alisa (BOS); Mchugh, Eileen (BOS); BOS Legislation, (BOS)
Subject:	PLANNING DEPARTMENT RESPONSE: Appeal of CEQA Exemption Determination - Proposed 2675 Geary Boulevard Project - Appeal Hearing on November 17, 2020
Date:	Monday, November 9, 2020 11:21:57 AM
Attachments:	image001.png

Greetings,

The Office of the Clerk of the Board received the following response brief from the Planning Department, regarding the appeal of CEQA Exemption Determination for the proposed 2675 Geary Boulevard project.

Planning Department Response Brief - November 9, 2020

I invite you to review the entire matters on our Legislative Research Center by following the link below:

Board of Supervisors File No. 201127

Best regards,
Jocelyn Wong
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
T: 415.554.7702 | F: 415.554.5163
jocelyn.wong@sfgov.org | www.sfbos.org

(VIRTUAL APPOINTMENTS) To schedule a "virtual" meeting with me (on Microsoft Teams), please ask and I can answer your questions in real time.

Due to the current COVID-19 health emergency and the Shelter in Place Order, the Office of the Clerk of the Board is working remotely while providing complete access to the legislative process and our services

Click here to complete a Board of Supervisors Customer Service Satisfaction form

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a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors' website or in other public documents that members of the public may inspect or copy.

San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
www.sfplanning.org

APPEAL OF EXEMPTION DETERMINATION

2675 GEARY BOULEVARD

Date:	November 9, 2020
To:	Angela Calvillo, Clerk of the Board of Supervisors
From:	Lisa Gibson, Environmental Review Officer Rachel Schuett, rachel.schuett@sfgov.org
RE:	Board of Supervisors File No. 201127, Planning Record No. 2019-004110ENV Appeal of the Common Sense Exemption for the 2675 Geary Boulevard Project
Hearing Date:	November 17, 2020
Attachment(s):	A – Historic Aerial Photos (May 15, 2019) B – Photos – Lot C (May 15, 2019) C – Site Plans (May 15, 2019) D – Memo to File – Hypothetical Loading Analysis (November 6, 2020) E – San Francisco APEZ 2020 Map
Project Sponsor:	Mark Loper, Reuben, Junius & Rose, (415) 567-9000
Appellant(s):	Mark R. Wolfe, M.R. Wolfe & Associates, P.C. (on behalf of San Francisco residents Julie Fisher and Tony Vargas, and United Food & Commercial Workers Union Local 5, and its members who live and/or work in San Francisco)

Introduction

This memorandum and the attached documents are a response to the letter of appeal to the board of supervisors (the board) regarding the planning department's (the department) issuance of a common sense exemption under the California Environmental Quality Act (CEQA determination) for the proposed 2675 Geary Boulevard project.

The department, pursuant to Article 19 of the CEQA Guidelines, issued a common sense exemption for the project on September 11, 2020 finding that the proposed project is exempt from the California Environmental Quality Act (CEQA).

The decision before the board is whether to uphold the department's decision to issue a common sense exemption and deny the appeal, or to overturn the department's decision to issue a common sense exemption and return the project to department staff for additional environmental review.

Site Description and Existing Use

The project site is a vacant 49,780-square-foot retail space within an existing 250,843- square-foot shopping center, the "City Center", located at the southeast corner of Masonic Avenue and Geary Boulevard, in the Western Addition Neighborhood of San Francisco (Assessor's Block 1094, Lot 001). The City Center shopping center, constructed in 1951, occupies the block bounded by Geary Boulevard to the north, Masonic Avenue to the west, O'Farrell Street to the south and Lyon Street to the east. The southern portion of the 288,297-square-foot City Center parcel (along O'Farrell Street) is generally upward sloping between Masonic Avenue and just east of Anza Vista Avenue, and then downward sloping from just east of Anza Vista Avenue to Lyon Street. The northern portion of the City Center parcel (along Geary Boulevard) is generally downward sloping between Masonic Avenue and Lyon Street. As a result, the 250,843 square feet of retail space in City Center is located on four levels with six separate parking lots (Lots A -F), each with independent access from O'Farrell Street, Geary Boulevard or Masonic Avenue. The City Center retail buildings are generally clustered along the northern portion of the City Center parcel adjacent to Geary Boulevard and the northern portion of the Masonic Avenue frontages. The parking lots fan out from the City Center retail buildings to the south, southwest, east and southeast (see Attachments A – C).

The neighborhood is primarily a mix of 2- to 3-story residential buildings, with commercial and institutional uses along Geary Boulevard and Masonic Avenue; the Kaiser San Francisco Medical Center is directly to the east of City Center. The vacant retail space (the Whole Foods Market project site) is located above an existing Target store and directly below a new daycare facility, "Bright Horizons," which opened in November 2019. The project site was formerly occupied by Best Buy.

Project Description

The project sponsor (Whole Foods Market) proposes a new grocery store, restaurant, and coffee bar within an existing vacant retail space (i.e., the project site). The proposed project would include a 49,780-square-foot grocery store, with a 3,320-square-foot restaurant, and a 1,190-square-foot coffee shop. The existing on-site parking "Lot C", with 117 parking spaces, would be available for parking for Whole Foods customers (see Attachment B). Loading and deliveries would occur from an existing 3,528-square-foot on-site loading dock, accessed from O'Farrell Street just east of Anza Vista Avenue, via Lot E. No changes to vehicle parking, bicycle parking, loading, driveway access, or on-site circulation are proposed. In addition, no changes are proposed to the public right-of-way. The project is limited to interior renovation. The project does not include exterior construction and would not require excavation.

Background

On July 23, 2019, Mark Loper (hereinafter "project sponsor") filed an application with the department for a CEQA determination in support of a conditional use authorization to permit a formula retail establishment, doing business as Whole Foods Market.

On May 14, 2020, the Planning Department issued a Class 32 Categorical Exemption for the proposed project.

On June 25, 2020 the Planning Commission issued a Conditional Use Authorization pursuant to Planning Code sections 303, 303.1 and 712 to permit a Formula Retail use (d.b.a. Whole Foods Market) within a NC-3 (Moderate-Scale Neighborhood Commercial) Zoning District, thereby approving the project.

On July 17, 2020, M.R. Wolfe & Associates, P.C. on behalf of San Francisco residents Julie Fisher and Tony Vargas, and United Food & Commercial Workers Union (UFCW) Local 5, and its members who live and/or work in San Francisco ("appellants") filed a timely appeal of the Class 32 Categorical Exemption.

On September 2, 2020, the Planning Department rescinded the Class 32 Categorical Exemption rendering the appeal filed on July 17, 2020 moot.[1,2]

On September 11, 2020, the department determined that the project was exempt under CEQA as a common sense exemption (the CEQA determination), and that no further environmental review was required.

On September 18, 2020, M.R. Wolfe & Associates, P.C., on behalf of appellants, filed an appeal of the CEQA determination.

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[1] After issuance of the Class 32 categorical exemption, the planning department requested clarification from the state water board as to which databases of properties are considered to be on the Cortese list (section 65962.5 of the Government Code). (E-mail from Lisa Gibson, Environmental Review Officer, San Francisco Planning Department to Eileen Sobeck, Executive Director, California State Water Resources Control Board, RE; Request for Clarification of GeoTracker Site Categories Included on Cortese List, July 9, 2020.) The state water board indicated that all sites on the GeoTracker database, among others, are deemed to remain on the Cortese list, regardless of the status of remediation of hazardous soil and groundwater at the property, and, accordingly, are ineligible for a categorical exemption (CEQA Guidelines section 15300.2(e)). The state water board further stated, however, that "the fact that a CEQA categorical exemption is not available for a specific property on the Cortese list does not foreclose the use of other applicable exemptions, including statutory exemptions or the common sense exemption." (Letter from Eileen Sobeck, Executive Director, California State Water Resources Control Board to Lisa Gibson, Environmental Review Officer, San Francisco Planning Department, RE; Clarification of GeoTracker Sites Included on the Cortese List, July 21, 2020.)

Prior direction to planning department staff from the state water board's toxics cleanup division (which was also confirmed on the California Environmental Protection Agency's [CalEPA's] website) was that sites on the GeoTracker database are not considered to be on the Cortese list unless the case status is listed as "open."

Per the Phase I Environmental Site Assessment prepared for City Center, one 1,000-gallon waste oil and six 3,500-gallon lube oil underground storage tanks (USTs) were removed from the site in 1987. These tanks were associated with a prior use of the building as a Sears Roebuck & Co. department store which included an automotive service center. Once the tanks were removed, the excavation was backfilled and closed. No soil remediation was required. As part of the Phase I Environmental Site Assessment, files were requested from the San Francisco Department of Public Health ("public health"); Public health issued a letter on March 24, 1999 stating that no further action was required for remediation of hazardous materials on the site.

Given the prior UST removal, the state water board considers the 2675 Geary Boulevard site to be included on the Cortese List although the status of the site is "closed" since no further action is required. Based on the latest guidance from the state water board, the proposed project does not qualify for a categorical exemption; therefore, the department rescinded the Class 32 categorical exemption. The hazardous materials on the site have been remediated in accordance with public health requirements. Further, the location of the remediation activities was not within or adjacent to and is both vertically and horizontally separated from the retail space that comprises the project site and no excavation or soil disturbance is required for the project. For these reasons the department issued a common sense exemption.

[2] San Francisco Planning Department. Appeal of Exemption Determination, San Francisco Department of Public Health Local Oversight Program Site No. 12076 Investigation/remediation at 1776 Green Street. October 13, 2020. Board File No. 200908, Planning Department Record No. 2020-002484ENV. Project specific studies prepared for the 1776 Green Street project are available for review on the San Francisco Property Information Map, which can be accessed at https://sfplanninggis.org/PIM/. Individual files can be viewed by clicking on the Planning Applications link, clicking the "More Details" link under the project's environmental record number 2019-004110ENV and then clicking on the "Related Documents" link.

CEQA Guidelines

Common Sense Exemption

CEQA Guidelines section 15061(b)(3) (the "common sense exemption") applies to projects where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment.

In determining the significance of environmental effects caused by a project, CEQA Guidelines section 15064(f) states that the decision as to whether a project may have one or more significant effects shall be based on substantial evidence in the record of the lead agency. CEQA Guidelines section 15064(f)(5) offers the following guidance: "Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumption predicated upon facts, and expert opinion supported by facts."

Planning Department Responses

The concerns raised in the appeal letter dated July 17, 2020 and the supplemental letter dated November 6, 2020 are addressed in the responses below.

Response 1: The freight loading impacts of the proposed project would be less than significant.
The appellants suggest that truck trip estimates in the transportation analysis are underestimated by one-third because the truck trip estimates are based on a store that is one-third the size of the proposed Whole Foods Market.

A project's loading demand is determined by two main factors: (1) how many trucks arrive each day; and (2) how long it takes each truck to unload. Whole Foods Market stores typically receive 70 to 75 percent of their product mix from three carriers in 65-foot trucks. The remaining 25 to 30 percent of products arrive in smaller box trucks and vans (similar to the vehicles used by the United Parcel Service and Federal Express) from a variety of other vendors.

The length of stay for delivery trucks and vans is typically referred to as dwell time. Dwell time varies by load size, which is directly related to truck or van size. Typically, 65-foot trucks dwell for approximately one hour to empty a full load and 30 minutes to empty a half load.[3,4]

The transportation analysis bases the loading demand for the proposed project on the loading activities of other Whole Foods Market stores. The analysis assumes the project would generate a maximum daily loading demand of 28 freight vehicles (the average daily loading demand is assumed to be 23 freight vehicles) and assumes the maximum dwell times for each vehicle (which assumes that the trucks would be carrying a full load). As stated in the transportation coordination memo[5,6] the project sponsor provided loading demand information from the busiest Whole Foods Market in San Francisco, located at 1765 California Street (at Franklin Street) (hereinafter

[3] Kittleson and Associates. *1600 Jackson Street Loading Analysis Memo*. April 19, 2018.
[4] Per the project sponsor, the 65-foot UNFI and DC trucks typically arrive 80 percent full, and the 65-foot Tony's trucks are typically 50 percent full.
[5] Project specific studies prepared for the 2675 Geary Boulevard project are available for review on the San Francisco Property Information Map, which can be accessed at https://sfplanninggis.org/PIM/. Individual files can be viewed by clicking on the Planning Applications link, clicking the "More Details" link under the project's environmental record number 2019-004110ENV and then clicking on the "Related Documents" link.
[6] San Francisco Planning Department. 2675 Geary Boulevard Transportation Coordination Memo. May 4, 2020.

"Franklin Street store"). The loading analysis assumed the same truck trips and dwell times as the Franklin Street store although, as stated in the transportation coordination memo, despite the proposed Whole Foods Market at 2675 Geary Street being larger than the Franklin Street store, the project sponsor expects the 2675 Geary Boulevard store to do a lower volume of business than at the Franklin Street store because the Franklin Street store has an established customer base and because there is a higher population density in the immediate vicinity of the Franklin Street store. In addition, the loading demand analysis did not take a loading trip credit from the prior use (Best Buy) that occupied the proposed project site until 2017; instead, the analysis reflects an entirely new use assuming all loading trips are new to the project site, rather than analyzing an incremental change in loading trips compared to the prior use.

Given these considerations, the loading estimates in the analysis are considered conservative (i.e., worst case). The maximum loading demand of 28 freight vehicles would be accommodated by the two existing on-site loading bays over the course of 8 hours. If, as appellants have suggested, three times the number of estimated truck trips would be required, the loading demand would still be met by the on-site loading bays over a period of 17 hours and 45 minutes on an average delivery day, and 21 hours on a maximum delivery day (see Attachment D). Further, in response to the CEQA determination appeal, the project sponsor provided a loading demand analysis prepared by a qualified transportation consultant.[7] That analysis estimated the loading demand based on the department's Transportation Impact Analysis Guidelines[8] and found that the project loading demand would be 27.1 daily freight vehicles, which is similar to, but slightly lower, than the maximum daily loading demand evaluated in the May 4, 2020 transportation coordination memo. In summary, the loading demand under all three analysis scenarios would be met.

Moreover, under CEQA, the impact analysis related to loading is focused on how loading impacts the public right-of-way. At this location, the loading facilities are completely contained within the project site and are separated from the public right-of-way by a large concrete apron, used as a parking lot. As a result, even if the loading facilities did not provide adequate capacity to meet the loading demand, for example, if more than two trucks were present for deliveries at the same time, any resulting truck queues would have adequate space to stage within the parking lot and would not spill out onto the public right-of-way.

Response 2: There would be no significant construction traffic impact associated with the proposed project.

The appellants claim that construction traffic would interfere with existing City Center operations and with traffic in adjacent streets. The appellants provide no evidence to support this claim.

The transportation analysis appropriately concludes that further analysis of construction traffic (beyond what was already provided in the project's transportation coordination memo) is not warranted. The proposed project is a change of use; a new retail use (Whole Foods Market) would occupy an existing building that was previously occupied by another retail use (Best Buy). Although this change of use would require interior improvements, there would be no exterior construction and no excavation. As a result, the proposed project would not involve the types of construction activities such as demolition, grading, and horizontal and vertical construction that typically generate a higher level of truck trips and could lead to traffic-related construction impacts. In addition, under CEQA, traffic-related construction impacts are evaluated based on the potential to affect the public right-of-way. Here, the existing building is surrounded (and separated from the public right-of-way) by a large concrete

[7] Kittleson and Associates. *Freight and Passenger Loading Demand and Construction Traffic Memo*. October 26, 2020.
[8] San Francisco Planning Department, *Transportation Impact Analysis Guidelines*. October 2019. https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update

apron (Lot C) that would serve as a parking lot for the proposed project (see Attachment B). This area is not currently in use, given that the portion of the building associated with Lot C is currently vacant. Therefore, even if a high level of construction activity were required, the existing parking lot (Lot C) would provide an adequate staging area for construction vehicles and activities, such that the public right-of way would not be affected. The department correctly concluded that the proposed project does not have the potential to result in a significant construction traffic impact.

Response 3: The proposed project would not result in air quality impacts related to toxic air contaminants (TACs).

The appellant's letter states that the project would result in emissions from diesel delivery vehicles that would expose nearby sensitive receptors to significant levels of toxic air contaminants (TACs). The appellants claim that trucks emitting diesel particulate matter may be onsite for 13.5 hours per day.

The Bay Area Air Quality Management District's guidelines for evaluating toxic air contaminants in CEQA review identifies "Minor Low Impact Sources", stating that these sources "do not pose a significant health impact even in combination with other nearby sources. These determinations were made through extensive modeling, sources tests, and evaluation of their TAC emissions."[9] These guidelines further state that projects meeting the criteria can be excluded from the CEQA process. Among the sources listed are roads with less than 10,000 total vehicles/day and less than 1,000 trucks per day. The department conservatively halves this screening criteria to 500 truck trips per day before requiring further analysis. The project's estimated maximum daily freight trucks of 28 is well below the Bay Area Air Quality Management District and the department's screening criteria stated above.

Additionally, the project sponsor has stated that all trucks would be required to turn off their engines while loading and unloading. Lastly, emissions from the diesel delivery vehicles will disperse and concentrations will decrease with increasing distance. The project's loading dock is at least 140 feet from the nearest sensitive receptor (the recently opened Bright Horizons preschool and daycare facilities located directly above the proposed Whole Foods Market[10]) and more than 200 feet from the sensitive receptors mentioned by the appellants which include: the Epiphany Center/Mount St.Joseph-St. Elizabeth, the Wallenberg School and the surrounding residential uses. The department's conclusion that the project would not result in a significant air quality impact is supported by the Bay Area Air Quality Management District's guidance for analyzing toxic air contaminants and provides substantial evidence that the project would not result in significant levels of toxic air contaminants.

Furthermore, in response to the CEQA determination appeal, the project sponsor provided a quantitative air quality and health risk analysis prepared by a qualified consultant. The analysis evaluated regional criteria air pollutant emissions generated by the project and assessed the potential health risk impact to sensitive receptors at the Bright Horizons preschool and daycare facilities and nearby residences. The analysis is based on worst-case meteorological and health risk parameters as recommended by the Office of Environmental Health Hazard Assessment and the Bay Area Air Quality Management District. The analysis assumes that all freight deliveries would be refrigerated trucks that idle for 10 minutes and run an onboard diesel generator to power the refrigeration equipment for the duration of the dwell time (average of 13.5 hours per day). The analysis found that criteria air pollutant emissions and health risks would not exceed any air pollutant or health risk significance

[9] Bay Area Air Quality Management District, *Recommended Methods for Screening and Modeling Local Risks and Hazards,* pg. 12. May 2011. Available online at: https://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CEQA/BAAQMD%20Modeling%20Approach.ashx). Accessed October 9, 2020.
[10] The loading dock is located on the northernmost portion of the existing Lot E.

threshold.[11,12] Specifically, the maximum cancer risk at the Bright Horizon's preschool and daycare center was estimated to be approximately 2.4 per one million persons exposed and the maximum cancer risk at the nearest resident was estimated to be 2.7 per one million persons exposed.[13] These cancer risk results can be compared to the planning department's threshold of 7 per one million persons exposed, which is a lower threshold than the Bay Area Air Quality Management District's threshold of 10 per one million persons exposed.

On November 6, 2020, the appellant provided a supplemental appeal letter containing an air quality analysis conducted by a consultant, Environmental Permitting Specialists. That analysis claims that the proposed project would result in significant project level and cumulative health risk impacts to nearby sensitive receptors. Department staff reviewed the analysis and determined that the analysis was based on a "Risk Prioritization Tool" available from the San Joaquin Valley Air Pollution Control District. This tool is not recommended by the Bay Area Air Quality Management District for evaluation of health risk impacts under CEQA.

As stated in the appellant's own air quality consultant's report, "One purpose of a risk prioritization screening is to determine whether the TAC [toxic air contaminant] risk warrants a refined health risk assessment."[14] The analysis provided by the project sponsor's air quality consultant is a refined, yet still conservative (i.e., worst case), analysis of potential health risk impacts that may result from the proposed project.

The appellant's supplemental appeal materials also state that because the project site is located in an air pollutant exposure zone and the area exceeds cumulative health risk thresholds identified by the Bay Area Air Quality Management District that any additional air pollution is a cumulatively considerable contribution to health risks. The appellant's air quality consultant appears to support this by providing an incomplete reference to the Bay Area Air Quality Management District's background documentation for developing the CEQA thresholds. The full paragraph from the guidelines is presented below, with the omitted text in italics:

> "*Thresholds for an individual new source are designed to ensure that the source does not contribute to a cumulatively significant impact* [emphasis added]. Cumulative thresholds for sources recognize that some areas are already near or at significant levels. If within such an area there are receptors, or it can be foreseen that there will be receptors, then a cumulative significance threshold sets a level beyond which additional risk is significant."[15]

The planning department agrees that the air pollutant exposure zone represents areas where existing cumulative health risks exceed health protective standards. In fact, San Francisco Planning and Public Health departments partnered with the Bay Area Air Quality Management District to develop the air pollutant exposure zone based on a citywide health risk assessment of air pollution and exposures from mobile (vehicles), stationary (sources permitted by the air district), and area sources. The air pollutant exposure zone is based on

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[11] Environmental Science Associates. *Air Quality Technical Memorandum – 2675 Geary Boulevard*. October 30, 2020.

[12] The air quality analysis evaluated the incremental change in air pollutant emissions based on the difference in emissions from the prior use ("Best Buy") and the proposed Whole Foods Market. However, if one were to assume all Whole Foods Market-generated air pollutant emissions to be new emissions, and not subtract the emissions from the prior use, the project would still not exceed any applicable criteria air pollutant or health risk significance threshold. It should also be noted that the planning department's health risk thresholds for projects located in the air pollutant exposure zone, such as the proposed project, are lower and therefore more health protective than the Bay Area Air Quality Management District's health risk thresholds.

[13] The cancer risk at the daycare is higher than that of the resident in part because the child's exposure duration is shorter than that of the resident, which is assumed to be exposed for 30 years.

[14] [Add referent to Appellant's supplemental appeal air quality analysis, page 4]

[15] Bay Area Air Quality Management District. *Proposed Air Quality CEQA Thresholds of Significance*, December 7, 2009, p.34. Available at: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/proposed-thresholds-of-significance-dec-7-09.pdf?la=en. Accessed November 6, 2020.

health-protective criteria that considers estimated cancer risk, exposures to fine particulate matter, proximity to freeways, and locations with particularly vulnerable populations. Updated modeling released in February 2020 indicate that the project site, and much of the entire eastern side of the San Francisco, is located within the air pollutant exposure zone (see Attachment E). However, the question is whether the proposed project would result in a cumulatively considerable contribution to that significant cumulative impact. The Bay Area Air Quality Management District's own guidance state, as shown above, that the thresholds for an individual new emissions source are designed to ensure that the source does not contribute to a cumulatively significant impact. As demonstrated in the health risk assessment provided by the project sponsor's air quality consult, the project would not exceed either the planning department or Bay Area Air Quality Management District cancer risk threshold for a new emissions source and therefore would not result in a considerable contribution to cumulative health risk impacts.

Conclusion

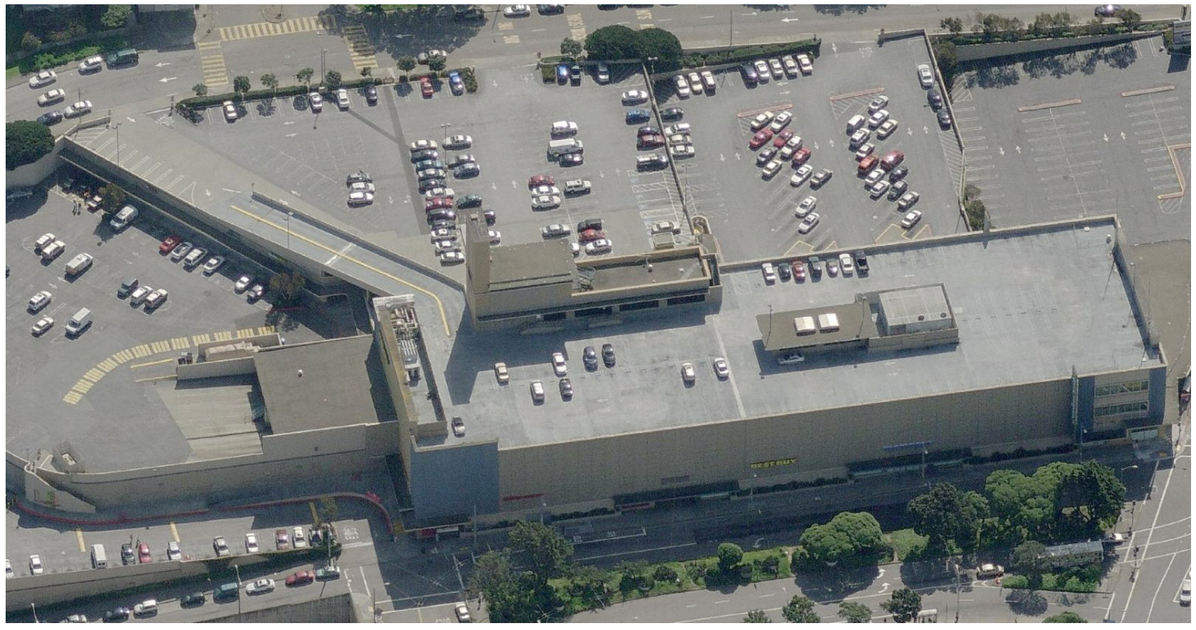
The project qualifies for the common sense exemption because it can be seen with certainty that there is no possibility that the project may have a significant effect on the environment; thus, the CEQA determination complies with the requirements of CEQA and the project is appropriately exempt from environmental review. The appellants have not demonstrated that the department's determination is not supported by substantial evidence in the record. The department therefore respectfully recommends that the board uphold the CEQA determination and deny the appeal.

In addition to the concerns raised above, the appellants have requested certain files related to this project. These files were provided to the appellants and posted to the Planning Department's website on July 30, 2020.

Site Context Photos Historical Photos

LOT C AND BEST BUY (FROM SOUTH)

AERIAL LOOKING TOWARD O'FARRELL STREET (FROM NORTH)



LOT C AND BEST BUY (FROM NORTH)

AERIAL LOOKING TOWARD GEARY BOULEVARD (FROM SOUTH)

Site Context Photos Exisiting Conditions

NORTH WEST AERIAL

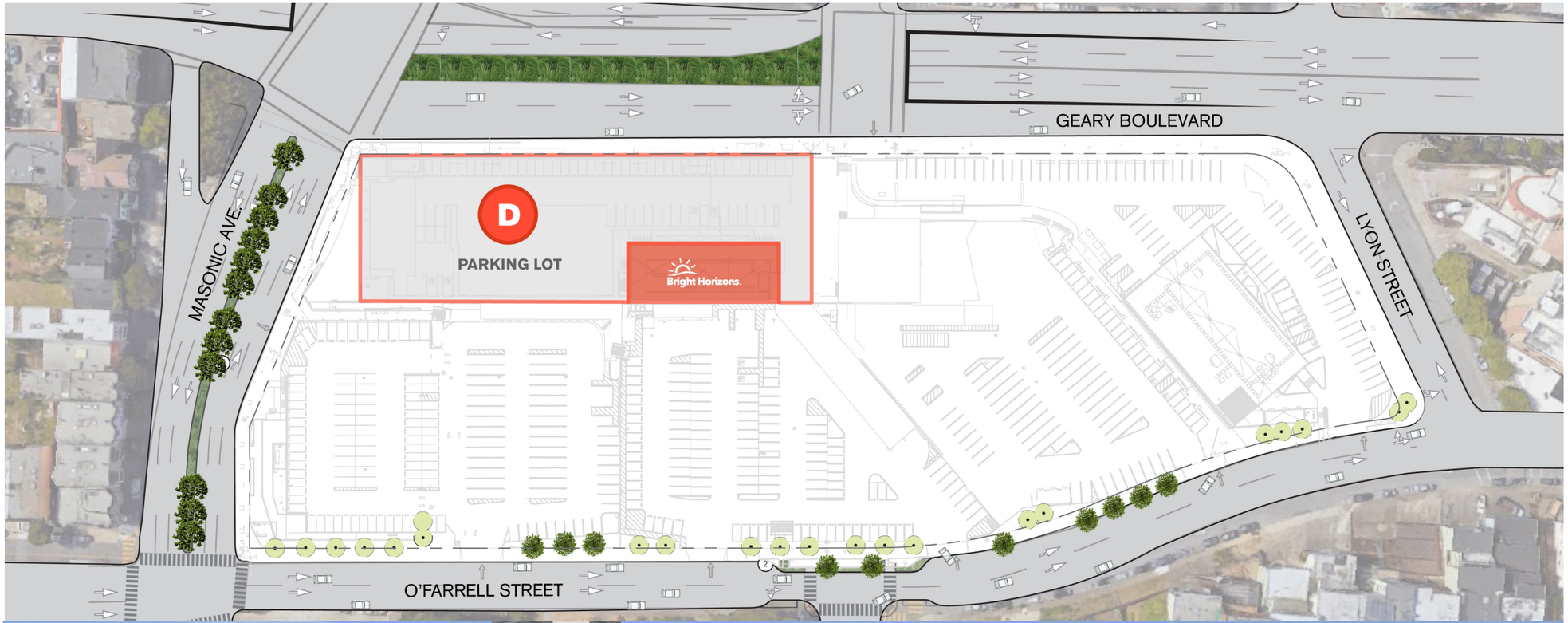
NORTH EAST AERIAL

Site Context Photos Lot C from O'Farrell

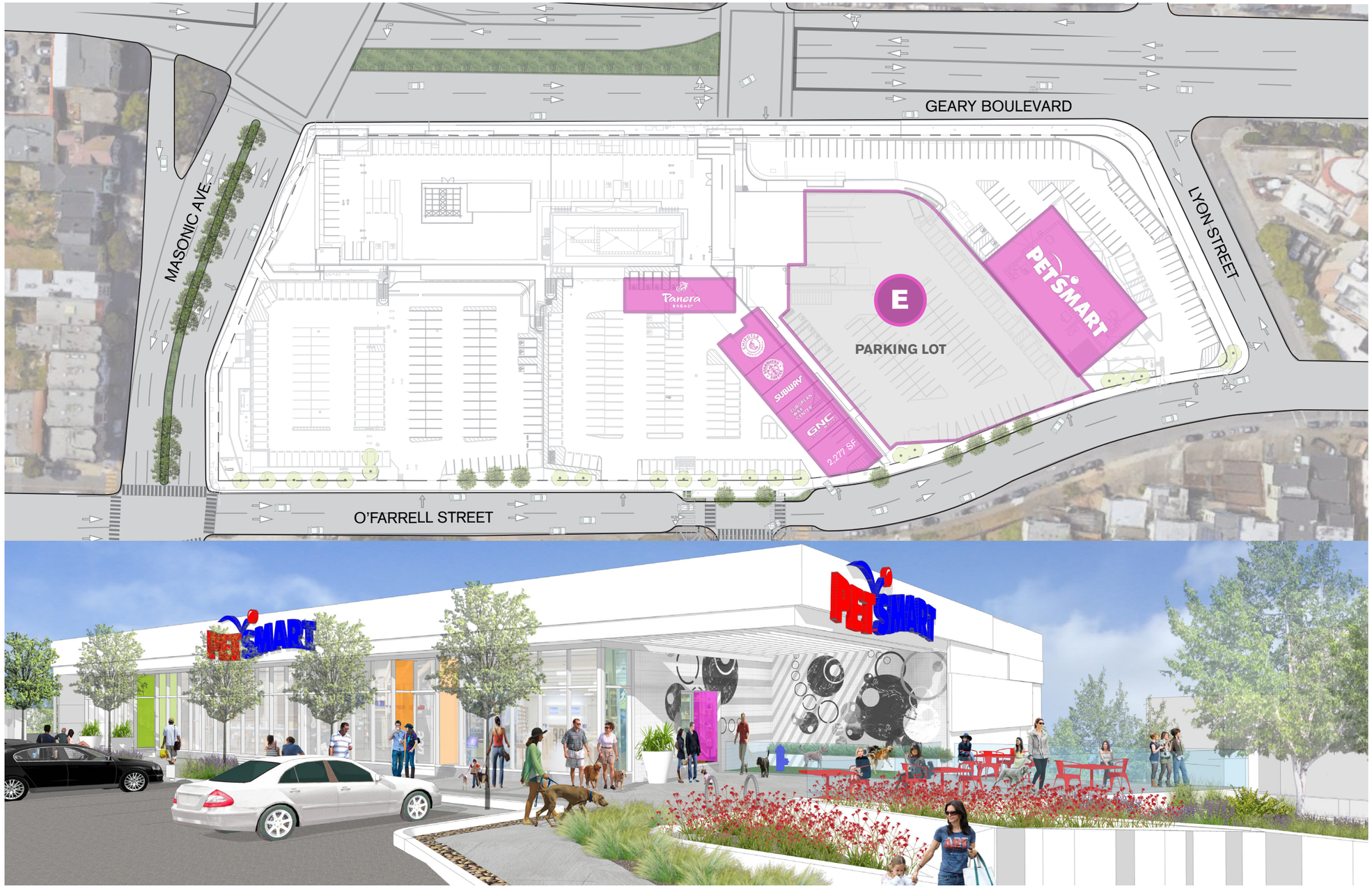
Site Context Photos Lot C Looking at Whole Foods

Context Plans/Views Lot C

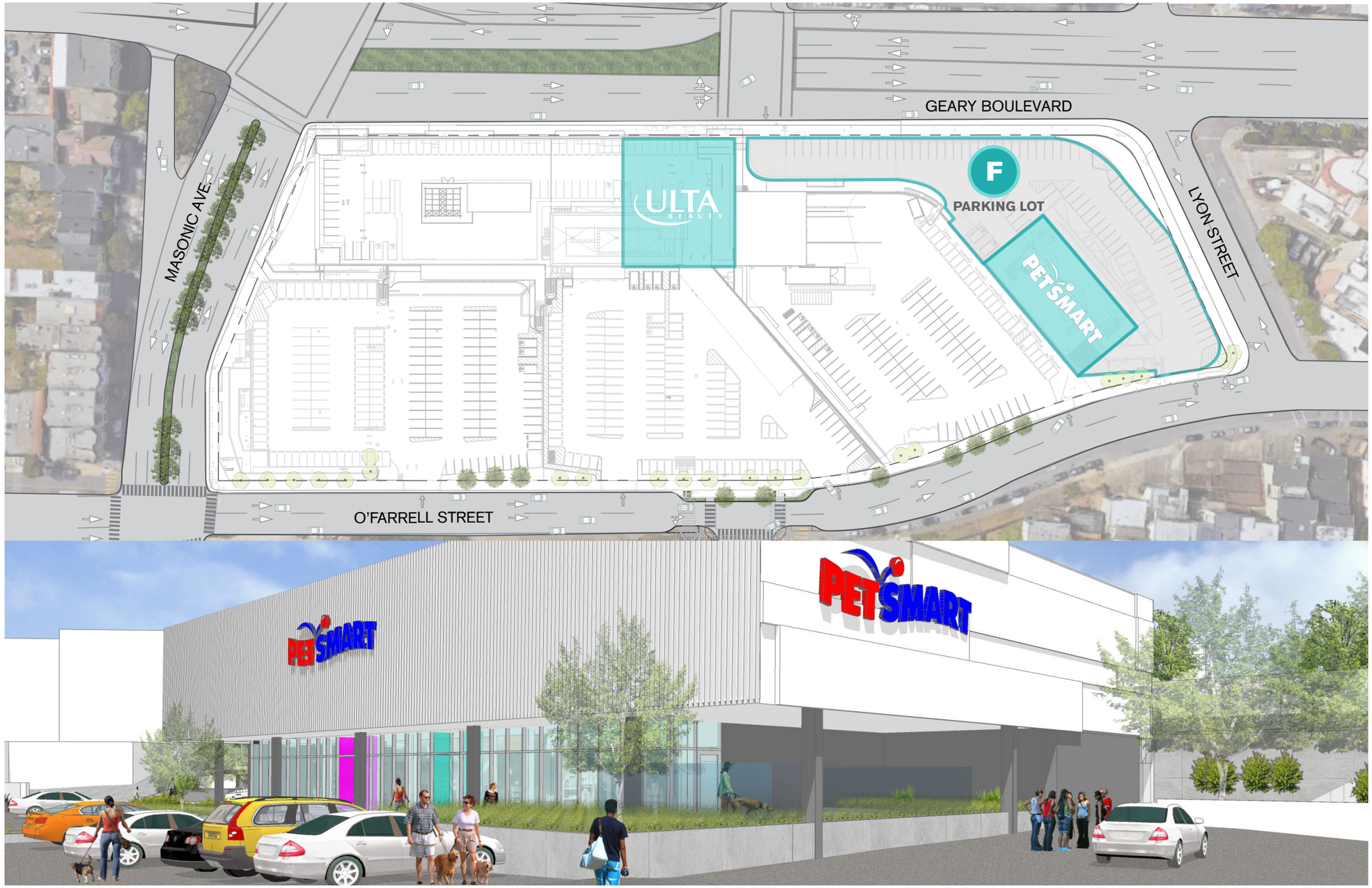
Context Plans/Views Lot D



Context Plans/Views Lot E



Context Plans/Views Lot F



San Francisco Planning

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San Francisco, CA 94103
628.652.7600
www.sfplanning.org

MEMO TO FILE (CASE NO. 2019-004110ENV) WHOLE FOODS MARKET (2675 GEARY BOULEVARD) - HYPOTHETICAL LOADING DEMAND CALCULATION

November 6, 2020

Case Number:	2019-004110ENV
Project Address:	2675 Geary Boulevard
Zoning:	NC-3 (Moderate-Scale Neighborhood Commercial)
Block/Lot:	1094/001
Project Sponsor:	Whole Foods Market California, Inc. c/o Mark Loper of Reuben, Junius & Rose, LLP One Bush Street, Suite 600 San Francisco, CA 94014
Staff Contact:	Rachel Schuett – (628) 652-7546 Rachel.schuett@sfgov.org

Background/Purpose

The San Francisco Planning Department (herein after "department") prepared a transportation coordination memo for the proposed Whole Foods Market at 2675 Geary Boulevard (hereinafter "Geary Boulevard store").[1] The freight loading impact analysis within the transportation coordination memo was informed by data collected at the busiest Whole Foods Market location in San Francisco at 1765 California Street (herein after "Franklin Street store"). Whole Foods Market indicated that the number of stock keeping units (SKUs) that would be sold at and the projected sales volumes for the Geary Boulevard store would be about the same as at the Franklin Street store.

Based on the Franklin Street store data, and the project site characteristics the department concluded that freight loading impacts would be less than significant.

On June 24, 2020, M.R. Wolfe & Associates, P.C. on behalf of San Francisco residents Julie Fisher and Tony Vargas, and United Food & Commercial Workers Union (UFCW) Local 5, and its members who live and/or work in San Francisco wrote a letter to the Planning Commission expressing concerns about the methodology and findings of the freight loading impact analysis.

Mr. Wolfe proffered that the projected sales volume and resulting number of deliveries for the proposed store would be more accurately calculated on a "business volume per square foot" basis. And, given that the retail

[1] San Francisco Planning Department. 2675 Geary Boulevard Transportation Coordination Memo. May 4, 2020.

sales floor at the Geary Boulevard location would be about three times the size of the Franklin Street location, suggested that the freight loading demand for the Geary Boulevard location would be about three times higher than what was calculated by the Planning Department.

In preparation for the June 25, 2020 Planning Commission hearing the Planning Department calculated a hypothetical freight loading demand three times higher than what was calculated for the transportation coordination memo.

This memo to file documents those calculations and the resulting freight loading impact analysis findings.

Hypothetical Loading Demand Analysis

A project's loading demand is determined by two main factors: (1) how many delivery vehicles (herein after "trucks") arrive each day; and (2) how long it takes each truck to unload (this is known as "dwell time"). The number of trucks is multiplied by the dwell time for each truck and divided by the number of loading spaces . The resulting loading demand is expressed as the number of truck trips per day and the total dwell time for all of the trucks. If the total dwell time does not exceed the freight loading hours for the proposed project, and there are no potential secondary impacts (such as trucks queuing in the public right-of-way) the impact is considered less that significant.

Truck Trips. As described above, the number of truck trips calculated for the transportation coordination memo was multiplied by three; as shown in Table 1. The truck trips calculated for the transportation coordination memo are shown in *(italics)* for reference.

Table 1: Whole Foods Deliveries – 2675 Geary Boulevard, San Francisco, CA[1]

Day of Week	Truck Length			Total
	65 foot	30-48 foot	Other[2]	
Daily Average[3]	*(4)* 12	*(4)* 12	*(15)* 45	*(23)* 69
Daily Maximum	*(4)* 12	*(4)* 12	*(20)* 60	*(28)* 84

[1] Source: San Francisco Planning Department and Whole Foods Market.
[2] Includes bobtail trucks and large or small vans.
[3] All values rounded up to the nearest whole number.

As shown in Table 1, the daily deliveries would include up to 69 truck trips on an average day and up to 84 truck trips on a maximum delivery day.

Dwell time. Whole Foods Market stores typically receive 70 to 75 percent of their product mix from three carriers in 65-foot trucks: UNFI, the DC, and Tony's. UNFI and the DC delivery trucks typically require an hour to empty a full load, and Tony's requires 30 minutes to unload a half load. Whole Foods conservatively estimates that the average dwell time for a 65-foot truck is one hour and that the average dwell time for all other vehicles is 30 minutes.[2,3]

[2] Kittleson & Associates. 1600 Jackson Street Loading Analysis Memo. April 19, 2018.
[3] This analysis is conservative as it assumes all trucks have full loads.

Based on the truck trips included in Table 1 and the average dwell times from other Whole Foods locations, deliveries to the proposed 2675 Geary Boulevard store would result in the following dwell times on an average day:

- 65-foot trucks: 12 deliveries x 60 minutes/per delivery = 720 minutes = six hours dwell time
- All other vehicles: 57 deliveries x 30 minutes/per delivery = 1,710 minutes = 28.5 hours dwell time
- Total dwell time on an average day = 34.5 hours/2 loading bays = 17.75 hours

Dwell times on a maximum delivery day would be:

- 65-foot trucks: 12 deliveries x 60 minutes/per delivery = 720 minutes = six hours dwell time
- All other vehicles: 60 deliveries x 30 minutes/per delivery = 2,160 minutes = 36 hours dwell time
- Total dwell time on a maximum day = 42 hours/2 loading bays = 21 hours

Loading operations could happen anytime during a 24-hour period since the City Center shopping center does not have time restrictions on deliveries, and no deliveries would be handled from the public right-of-way.

Conclusion

Since loading operations could happen anytime during a 24-hour period, the total dwell time on an average day (17.75 hours) and a maximum delivery day (21 hours) could occur within the designated freight loading hours for the project.

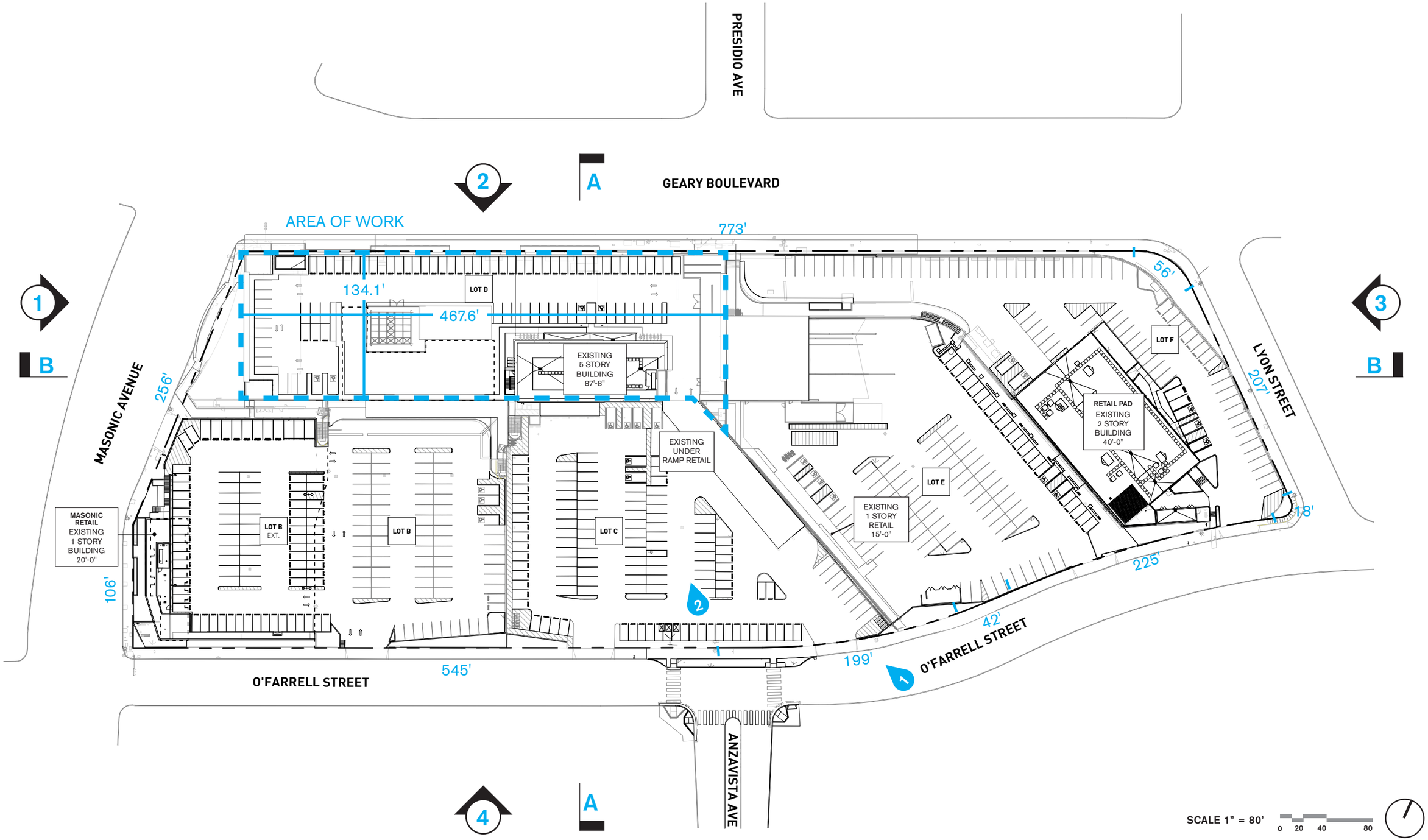
Loading and deliveries would occur from an existing 3,528-square-foot loading dock which is accessed from O'Farrell Street, just east of Anza Vista Avenue. The loading dock is located on the northernmost portion of the existing Lot F, at least 200 feet north of the driveway on O'Farrell Street. The parking spaces and drive aisles/circulation spaces within Lot F would provide adequate space for delivery vehicles to queue if both loading dock bays are occupied when an additional truck(s) arrive, without spillover into the public right-of-way.

As such, the loading supply would be adequate to accommodate loading demand and freight loading impacts would be *less than significant*.

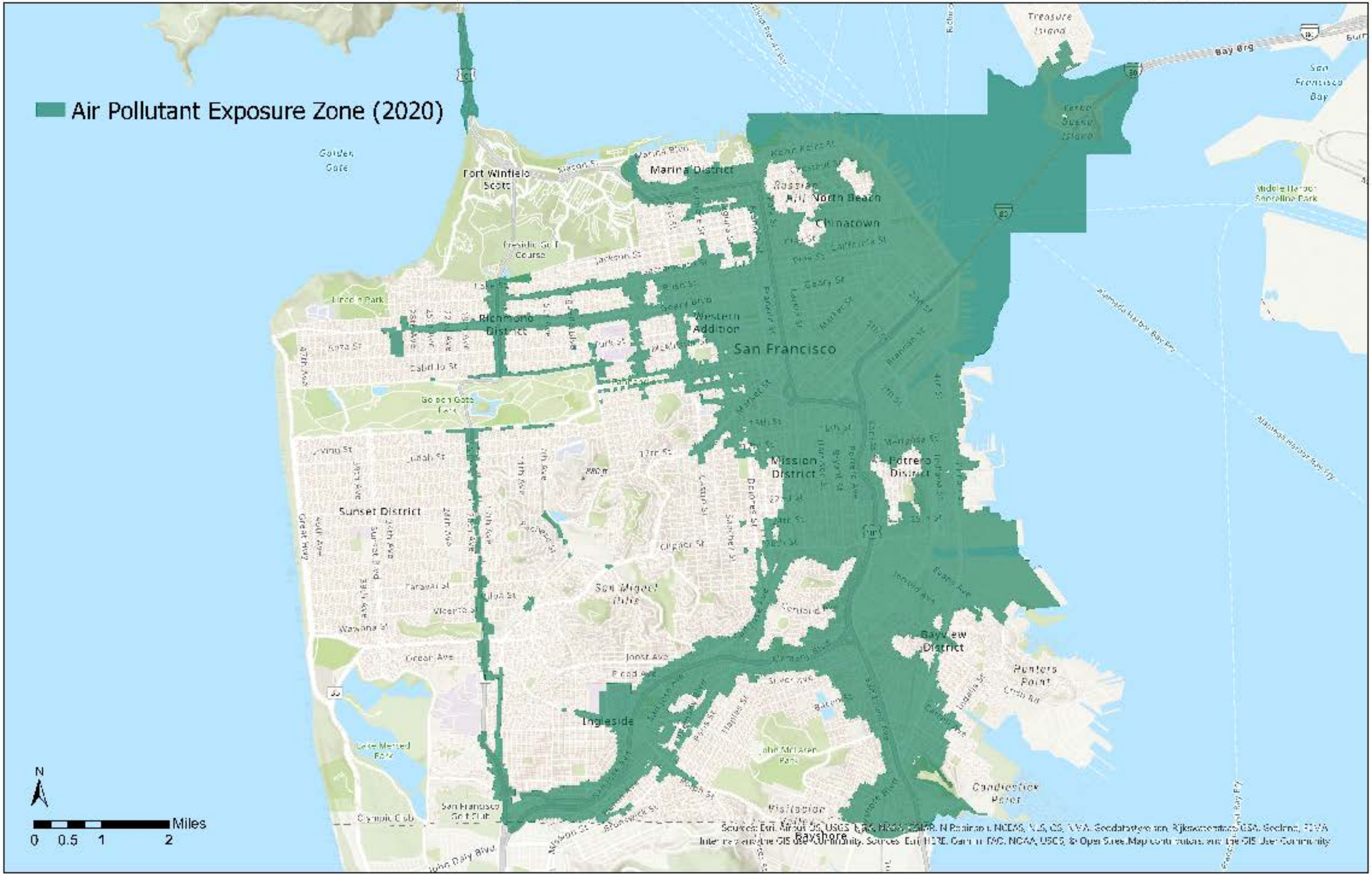
Attachments:

Attachment 1: Site Plan

Site Plan


PRESIDIO AVE
GEARY BOULEVARD
AREA OF WORK
773'
134.1'
467.6'
LOT D
56'
EXISTING
5 STORY
BUILDING
87'-8"
LOT F
RETAIL PAD
EXISTING
2 STORY
BUILDING
40'-0"
LYON STREET
207'
256'
MASONIC AVENUE
EXISTING
UNDER
RAMP RETAIL
LOT E
EXISTING
1 STORY
RETAIL
15'-0"
MASONIC
RETAIL
EXISTING
1 STORY
BUILDING
20'-0"
LOT B
EXT.
LOT B
LOT C
106'
18'
225'
42'
199'
545'
O'FARRELL STREET
O'FARRELL STREET
ANZAVISTA AVE
SCALE 1" = 80'
0 20 40 80

Air Pollutant Exposure Zone (2020) Map



From:	BOS Legislation, (BOS)
To:	Mark Wolfe; mloper@reubenlaw.com; cangelis@reubenlaw.com
Cc:	PEARSON, ANNE (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); RUIZ-ESQUIDE, ANDREA (CAT); Hillis, Rich (CPC); Teague, Corey (CPC); Sanchez, Scott (CPC); Gibson, Lisa (CPC); Jain, Devyani (CPC); Navarrete, Joy (CPC); Lewis, Don (CPC); Varat, Adam (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Ionin, Jonas (CPC); Schuett, Rachel (CPC); May, Christopher (CPC); Wietgrefe, Wade (CPC); Range, Jessica (CPC); Rosenberg, Julie (BOA); Sullivan, Katy (BOA); Longaway, Alec (BOA); BOS-Supervisors; BOS-Legislative Aides; Calvillo, Angela (BOS); Somera, Alisa (BOS); Mchugh, Eileen (BOS); BOS Legislation, (BOS)
Subject:	PROJECT SPONSOR RESPONSE AND APPELLANT SUPP INFO: Appeal of CEQA Exemption Determination - Proposed 2675 Geary Boulevard Project - Appeal Hearing on November 17, 2020
Date:	Friday, November 6, 2020 1:12:27 PM
Attachments:	image001.png

Greetings,

The Office of the Clerk of the Board received the following response brief from the project sponsor Mark Loper of Reuben, Junius & Rose, LLP on behalf of Whole Foods Market and the following supplemental information from the appellant, Mark Wolfe of M. R. Wolfe & Associates, P.C., on behalf of Julie Fisher, Tony Vargas, and United Food & Commercial Workers Union Local 5, regarding the appeal of CEQA Exemption Determination for the proposed 2675 Geary Boulevard project.

Project Sponsor Response Brief – November 6, 2020
Appellant Supplemental Information – November 6, 2020

I invite you to review the entire matters on our Legislative Research Center by following the link below:

Board of Supervisors File No. 201127

Best regards,
Jocelyn Wong
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
T: 415.554.7702 | F: 415.554.5163
jocelyn.wong@sfgov.org | www.sfbos.org

(VIRTUAL APPOINTMENTS) To schedule a "virtual" meeting with me (on Microsoft Teams), please ask and I can answer your questions in real time.

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REUBEN, JUNIUS & ROSE, LLP

Mark Loper
mloper@reubenlaw.com

November 6, 2020

Delivered Via Email (bos.legislation@sfgov.org)

President Norman Yee and Supervisors
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place
City Hall, Room 244
San Francisco, Ca. 94102

Re: 2675 Geary Boulevard – City Center Whole Foods
File No. 201127 – Appeal of CEQA Determination of Exemption
Our File No.: 8855.17

Dear President Yee and Supervisors,

We represent Whole Foods Market, which is proposing to open a store at the City Center shopping plaza at 2675 Geary Boulevard (the "Project"). The Project will add a much-needed grocery store in this neighborhood, in an existing retail space last occupied by Best Buy. The Project has a widespread coalition of support, including neighbors, business groups, and non-profits. As a grocery store, restaurant, and coffee shop, the Project would not introduce a new land use that could have a significant adverse effect on the environment. The present appeal is brought following the Planning Commission's 6-1 approval of the Project at a Conditional Use hearing on June 25, 2020. The Conditional Use approval—based on a "necessary and desirable" standard—was not appealed to this Board.

The City Center shopping plaza represents a uniquely ideal location for a new grocery store, with ample off-street parking, dedicated loading, and a forgiving truck maneuvering area. As detailed in the Planning Department's response to the appeal and supplemental studies included as exhibits to this brief, there will be no significant impacts on transportation, air quality, or other environmental topics that are the subject of this CEQA appeal. These studies supplement the City's CEQA review and further demonstrate that Appellants' speculative arguments are without merit. The Project's loading demand was accurately modeled, and the site's dedicated loading and truck maneuvering areas will ensure no significant transportation impact. Air quality modeling following San Francisco's standard methodology similarly demonstrates the Project's air quality impacts would be below significance thresholds by a matter of multiples. It is improper to misuse the CEQA process to revisit an entitlement approval.

A. Summary of Project Benefits

- **Coalition of support**. The Project has a wide range of support that includes the Anza Vista Neighborhood Group, the Booker T. Washington Community Service Center, CityTeam, Collective Impact/Magic Zone, Food Runners, the Fillmore Merchants Association, the Greater Geary Boulevard Merchants Association, NIBBI and Eric F. Anderson union general contractors, citywide organizations like the San Francisco Chamber of Commerce, and hundreds of San Francisco residents. Support letters are attached as group **Exhibit A**.

- **Union trade labor.** Between 84-94% of Whole Foods' recent San Francisco construction and renovation projects included union trade labor, spent in different neighborhoods throughout San Francisco. Its three pipeline projects are expected to spend approximately $31 million. The Project alone projects $9.6 million in union labor contracts.

- **New jobs available to all San Franciscans.** The store will be a strong source of good jobs in the community, particularly for semi-skilled and unskilled workers. Whole Foods is committed to hiring all San Franciscans. 76% of its San Francisco employees live in the City. 72% of its employees are full time, and 57% identify as non-white. The store will employ approximately 200 people, with 35-40 people working per shift. Separately, it is expected to create 91 construction jobs.

- **Booker T. Washington Community Service Center partnership**. Whole Foods' partnership with the Booker T. Washington Community Service center would provide jobs, food, and services to the Western Addition neighborhood. Whole Foods will prioritize hiring at least 30% of its employees through Booker T. Washington, and hold local recruitment events and a community workshop. It will make an ongoing monthly $1,000 donation for healthy snacks; set up a permanent volunteer program for store employees at the community service center; sponsor Booker T. Washington's upcoming 100th anniversary event; and upgrade the center's existing garden facilities.

- **Consistent with City Center's historic tenant occupancy**. City Center has operated as a large shopping mall for over 50 years, with a history of large retail tenants, including Sears, Mervyns, Toys-R-Us, Best Buy, Office Depot, and Target, and a host of smaller spaces occupied by food and beverage and other complimentary national retailers. Whole Foods proposes to occupy an approximately 50,000 square foot space last used as a Best Buy.

B. Background on City Center and Site Context

1. Property Development History and Background

City Center spans one entire city block and has frontage on four streets: Geary Boulevard, O'Farrell Street, Masonic Avenue, and Lyon Street. It has operated as a shopping mall for approximately 50 years. It is a four-level, stand-alone shopping center with approximately 240,000

square feet of primarily retail space. It was built in 1961 and used as a Sears department store until the 1990s. After Sears vacated, City Center's retail space was subdivided and initially reoccupied by several national retailers, including Mervyns, Toys-R-Us, the Good Guys, and Office Depot. The Good Guys left the property in 2005, Toys-R-Us was replaced by Best Buy in 2007, and Mervyn's vacated an approximately 90,000 square foot space in December of 2008. Best Buy vacated the space proposed for Whole Foods in 2017.

Conditions in the area are atypical for neighborhood commercial districts, which are generally characterized by small- to mid-sized businesses, often located in mixed use buildings. Neighborhood commercial streets usually tend to be pedestrian-oriented with continuous retail frontages at the ground floor. In contrast, the area surrounding the Property is auto-oriented in its scale and design. It is located along a three-mile Geary Boulevard commercial corridor that stretches from the Western addition to the Outer Richmond. Commercial and institutional uses are located on main streets in the project vicinity—including City Center, the University of San Francisco, Kaiser Permanente Medical Center, and the Laurel Heights Shopping Center.

2. Parking and Loading at City Center

As noted above, the City Center shopping plaza represents a uniquely ideal location for a new grocery store, with ample off-street parking, dedicated loading, and a forgiving truck maneuvering area.

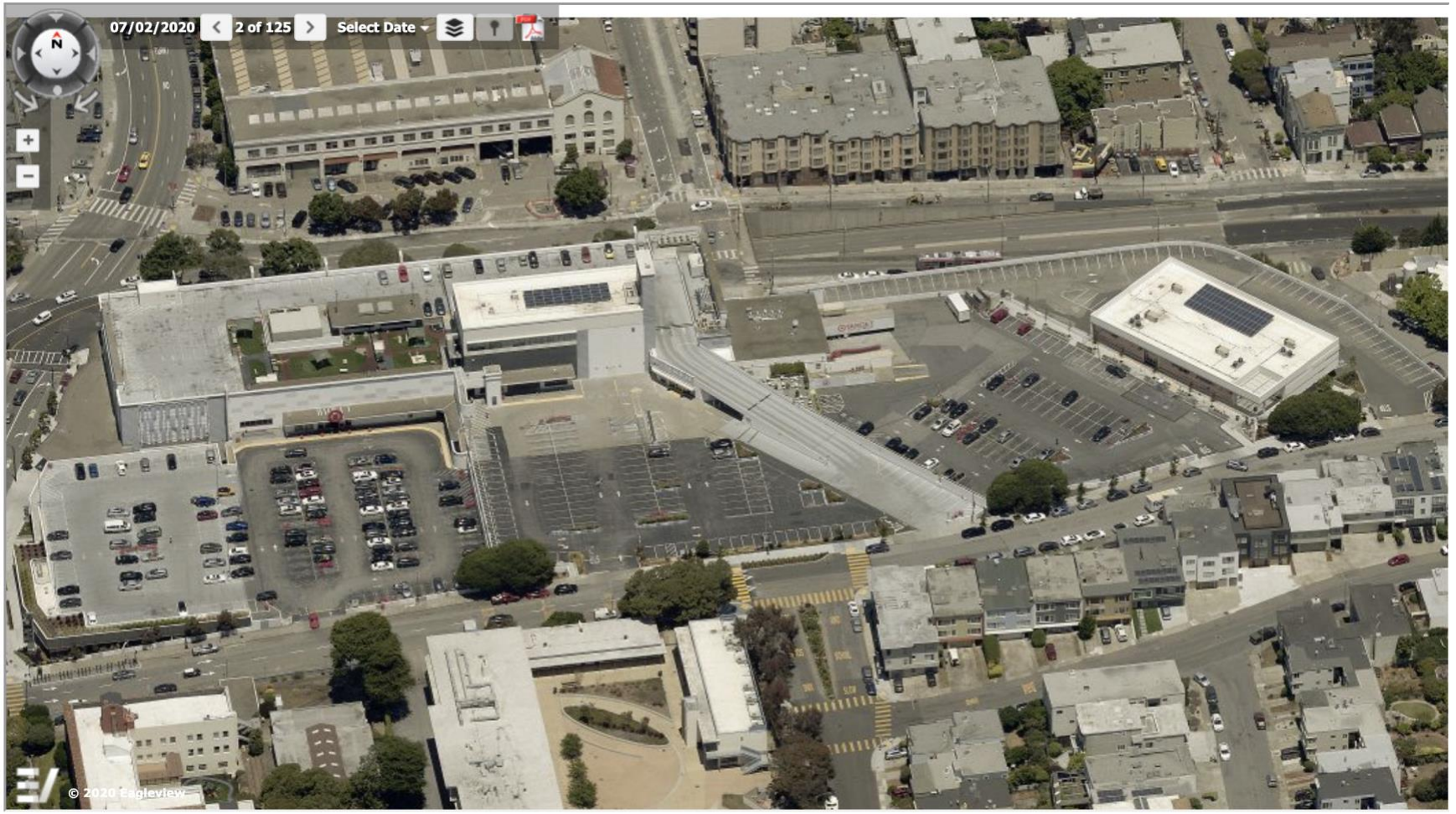
It has 634 total parking spaces, including 117 in Parking Lot C where the Whole Foods store would be located. There are also 10 Class 2 bike parking spaces next to the store entrance. Access to Lot C and the loading dock in Lot E is from O'Farrell Street, which is one way. Other parking lots at the Property are accessible from Masonic Avenue or Geary Boulevard, but the two most likely to be used by Whole Foods are accessible off of O'Farrell.

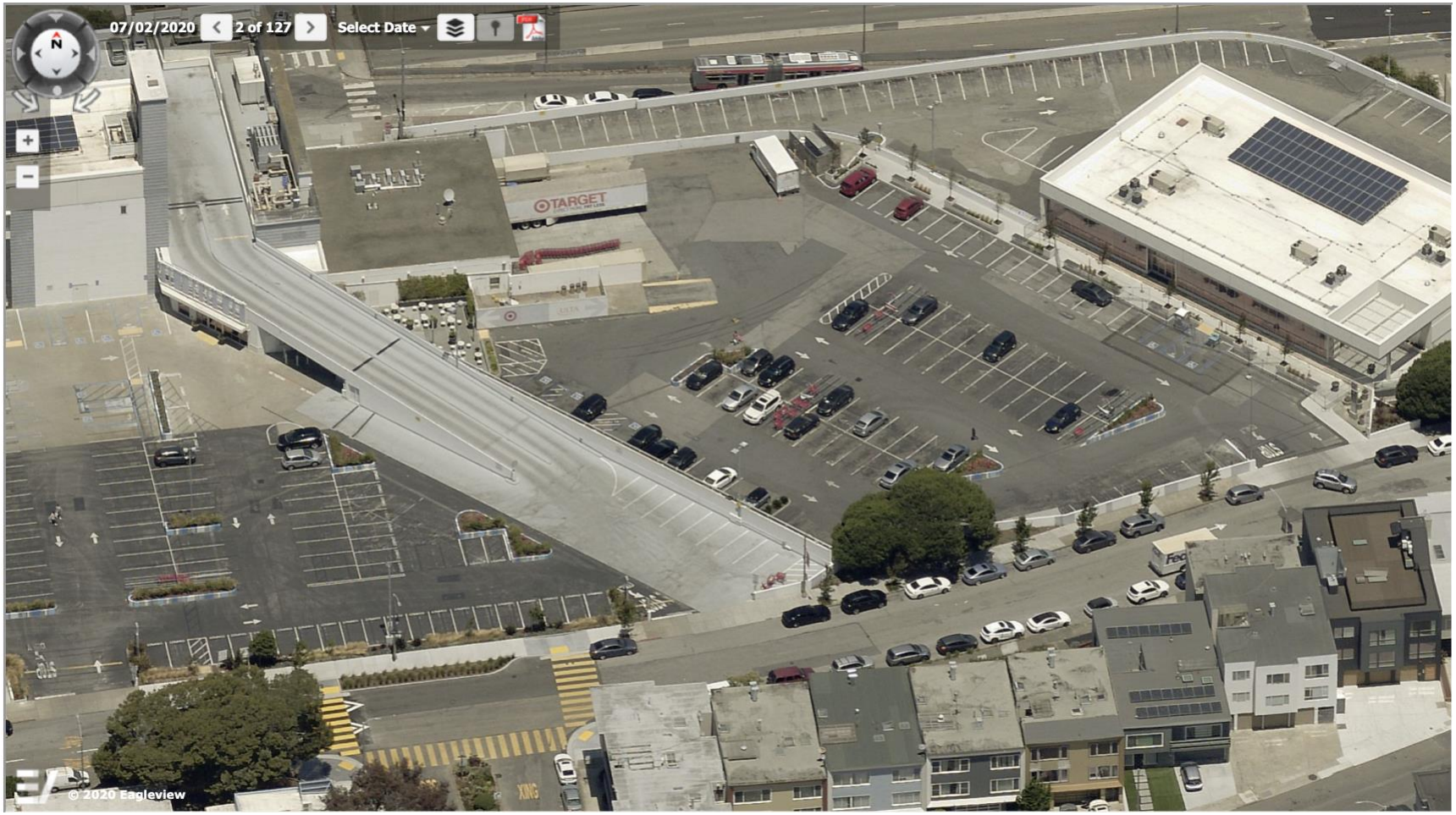
Freight and commercial loading will take place in a loading bay in Lot E. Whole Foods will have exclusive use of two loading stalls that can each accommodate a 65-foot trailer. The loading area is accessed through Lot E and is located approximately 270 feet as a truck would travel from the public right-of-way. Car parking spaces are set back generously from the loading dock area. As demonstrated in the truck turning radius diagram included as **Exhibit B**, adequate space exists for truck turning maneuvers. Whole Foods' loading dock is approximately 3,528 square feet in size and includes a backstock room, a receiving cooler, dedicated elevator lifts to the back of house space in the store, and a receiving area staffed by Whole Foods employees.

The Project does not propose any changes to vehicle parking, bicycle parking, freight or passenger loading, driveway access, or onsite circulation. No changes are proposed in the public right-of-way, either. No exterior construction or excavation of any sort is proposed.

The following two pages show the entire City Center site and Lot E, where the loading bay is located.

REUBEN, JUNIUS & ROSE, LLP




07/02/2020
2 of 127
Select Date
TARGET
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C. Whole Foods' Benefit to San Francisco

Through construction labor, local hiring practices, and charitable giving within San Francisco, Whole Foods provides a significant benefit to the city's residents. At a time when many San Franciscans count themselves among the millions of Californians who have recently filed for unemployment, Whole Foods generally, and this Project specifically, will help alleviate the effects of the recession on all San Franciscans.

Whole Foods remains committed to using union trades. It has had between 84%-94% union trade labor on recent San Francisco projects dating back to 2004. It spent $28 million (approximately $33-$40 million adjusted for 2020) on union trade buildout and renovations of stores in SOMA, Potrero Hill, the Outer Sunset, Duboce Triangle, and Noe Valley. Its three pipeline projects in Mid-Market, Stonestown, and City Center are estimated to include $30.9 million in union labor, with $9.6 million alone at City Center. All three of these projects are anticipated to include over 90% union labor. A letter from Eric F. Anderson, Inc., a third-generation family and women-owned General Contractor, explaining Whole Foods' commitment to union labor since the 1980s is included with the support letters attached as group **Exhibit A**.

Whole Foods' employment practices emphasize hiring a diverse range of San Franciscans. It currently employs 1,420 people in San Francisco, 1,076 (76%) of which are San Francisco residents. 72% of its San Francisco employees work full-time. Over half of San Francisco Whole Foods employees identify as non-white. Whole Foods has partnered with Employment Plus, Access SFUSD Transition Program, and the SF LGBTQ Center, and works closely with the City on its First Source Hiring initiatives.

Whole Foods has a track record of charitable giving to various local non-profits and public agencies. In 2019 alone, Whole Foods raised or donated the equivalent of over $200,000 to local non-profits. Direct donations included La Cocina; Real Food Stories; SF Marin Food Bank; SF Pride; and 750 turkeys donated to City Hall. Its Whole Kids Foundation gave garden grants in 2019 to the SF Waldorf Association, Telegraph Hill Dwellers, Sherman Elementary, Communitygrows, the Edison Charter Academy, and the Golden Bridges School. 2018 grantees included SFUSD, Moscone Elementary, Marshall Elementary, and the SF Community Alternative. Finally, past San Francisco Whole Foods stores' "5% Day" —in which 5% of sales are donated to a good cause—recipients include Bay Area Ridge Trail, Working Solutions, Project WeHope, Kitchen Table Advisors, CA Alliance w/ Family Farmers, Roots of Change, Cuesa, SF Education Outside, and Garden for the Environment.

Finally, Whole Foods has established a permanent partnership with the Booker T. Washington Community Service Center. Whole Foods is in a unique position to provide jobs, food, and services to a neighborhood that has been subject to the kinds of exclusionary zoning practices that can contribute to job insecurity and food deserts. Whole Foods will prioritize hiring 30% of its store employees through Booker T. Washington, or 60 jobs. It will hold local recruitment events

and a community workshop in collaboration with Booker T. Washington and other Western Addition nonprofits. In addition to these workforce initiatives, Whole Foods will make an ongoing monthly $1,000 donation for healthy snacks; set up a permanent volunteer program for store employees at the community service center; sponsor Booker T. Washington's upcoming 100th anniversary event; and upgrade the center's existing garden facilities.

D. The Evidence in the Record Demonstrates No Significant Environmental Impact

Under CEQA, a lead agency must decide if a project might have significant effects on the environment based on "substantial evidence" in the record before it.[1] Substantial evidence includes facts, reasonable assumptions based on facts, and expert opinion supported by facts.[2] Speculation, argument, unsubstantiated opinion or narrative, clearly inaccurate or erroneous evidence, or not credible evidence is not substantial evidence.[3]

For a common sense exemption like the present one, once the City has demonstrated with substantial evidence there is no possibility the Project will cause a significant impact on the environment, the Appellants can only prevail if they present reasonable evidence that the City cannot refute which demonstrates the Project might cause a significant environmental impact.[4] CEQA also requires a project to be compared against existing baseline conditions,[5] which in this case is an existing large retail space within a shopping mall.

The evidence in the record constitutes substantial evidence that the Project will not cause any significant CEQA impact. By this brief, we are supplementing the evidence in the record to include a Freight and Passenger Loading Demand and Construction Traffic Memo by Kittelson & Associates attached as **Exhibit C** (the "Kittelson Transportation Memo"); an Air Quality Technical Memorandum prepared by Environmental Science Associates attached as **Exhibit D** (the "ESA AQ Memo").

The Kittelson Transportation Memo demonstrates the accuracy of the City Transportation Memo using an alternative methodology based on store gross square footage—exactly as suggested by Appellants. The ESA AQ Memo demonstrates that the Project will be comfortably below all air quality related significance thresholds, contrary to Appellants' claims in its appeal brief. These studies, combined with the City's prior CEQA determination and its Transportation Memo (the "City Transportation Memo"), directly refute Appellants' speculative arguments. Rather than restate the arguments set out in the Planning Department's response, we incorporate it by reference and focus on how the Kittelson Transportation Memo and the ESA AQ Memo support the City's CEQA determination.

1. The Kittelson Transportation Memo and Loading and Construction

Appellants' principal critique of the City Transportation Memo is its reliance on reported figures from past Whole Foods transportation memos or existing store data, and use of Stock Keeping Units, instead of estimating freight and passenger loading demand based on store size.

The Kittelson Transportation Memo does just that, using the Project's gross square footages to estimate freight and passenger loading demand. Specifically, it followed San Francisco's *2019 Transportation Impact Analysis Guidelines for Environmental Review*, which estimates freight loading demand based on the size of each land use and a corresponding truck trip generation rate. Using the standard San Francisco guidelines and methodology, it estimates 27.1 total daily trips and 3.2 total peak hour trips, consistent with the City Transportation Memo's conclusion of between 23 and 28 total daily trips. A table summarizing freight loading demand:

Table 2: Freight Loading Demand based on SF Guidelines Rates and Methodology

Land Use	Size (Square Feet)	Turnover Rate (R Value)	Trips		Demand	
			Daily Trips	Peak Hour Trips	Peak Hour Demand (Number of Spaces)	Rounded Peak Hour Demand
Supermarket	49,780	0.22[1]	11.0	1.5	0.6	1.0
Restaurant	3,320	3.6	11.9	1.6	0.6	1.0
Coffee Shop	1,190	3.6	4.2	0.6	0.2	1.0
Total	**54,290**	-	**27.1**	**3.2**	-	**3**

Source: Kittelson & Associates, 2020; San Francisco Planning Department, 2019
[1]Trips were estimated using the *composite retail* rate from the SF Guidelines, a category which includes but is not limited to personal services, wholesale, apparel, drug stores, and specialty shops.
Demand Equation: Daily Trips = (SF/1,000) * R; Average Hour = (SF/1,000) * R/9/2.4; Peak Hour = (GSF/1,000) * (R * 1.25)/9/2.4

The Kittelson Transportation Memo proves that freight loading demand based on an alternative and equally-acceptable methodology—gross square footage instead of reported figures and SKUs—would provide the same estimates.

Appellants also completely fail to (1) take the existing site conditions of City Center into account when discussing a CEQA impact due to freight loading, and (2) explain what CEQA impact could result from freight vehicle trips to the site. Under CEQA, loading operations are typically evaluated for their direct effect on the physical environment by conflicting with activities in the public right-of-way, or indirectly through air quality. We address air quality below.

Regarding impacts to the public right-of-way, Appellant suggests that a peak hour scenario with three freight deliveries arriving during the same unloading period would cause a significant CEQA impact. To borrow a term from Appellants, this strains credulity. The loading dock is set back approximately 270 feet from the public right-of-way accessible off of O'Farrell Street as a truck would travel. The drive-aisle can easily accommodate several freight loading vehicles as the two other trucks unload. These vehicles can be located out of the area necessary for truck turning, similarly without causing any impact on pedestrians, bikes, or vehicles in the public right-of-way. Unlike many other grocery stores in San Francisco, City Center's loading operations are self-contained and relatively isolated from cars using the parking lot.

Appellant also claims without any supporting evidence that the interior tenant improvement work will generate construction traffic that would interfere with adjacent streets. This is unsupported by any reasonable inferences based on conditions at City Center. As the Kittelson Transportation Memo notes, no heavy construction vehicles will be needed and no construction traffic routing in the public right-of-way would be necessary. Whole Foods' buildout would include a total of 91 construction workers on site, a maximum estimate (see Whole Foods' First Source Hiring Affidavit, attached as **Exhibit E**). Lot C alone has 117 vehicle parking spaces in front of the worksite; to the extent necessary, workers could park in a different lot where an additional 517 spaces exist. Construction activities will not cause a significant impact.

2. Air Quality Screening-Level Analysis Demonstrates No Significant Impact

Appellants also claim without any analysis that air quality impacts will be significant due to toxic air contaminants ("TACs") from delivery vehicles, that the project would adversely affect nearby sensitive receptors, and therefore the level of TACs would "likely" exceed BAAQMD's significance thresholds. Following standard City methodology, the ESA AQ Memo proves the Project's air quality impacts are comfortably below BAAQMD's significance thresholds. The only substantial evidence in the record supports City staff's conclusion of no significant air quality impact.

ESA prepared a 125-page memorandum detailing an air quality analysis and screening-level health risk assessment for the Project. Specifically, it analyzes the increase in criteria pollutant emissions, TACs, and health risks associated with the new Whole Foods to provide a quantitative and analytical response to the Appellants. It assumed the same sensitive receptors identified in Appellants letter, and also included a daycare center on the roof of City Center. ESA also identified the total operational emissions generated by Whole Foods, and the net increase

when taking into account Best Buy's past operations. A complete table demonstrating how far below CEQA thresholds is included below.

TABLE 1
OPERATIONAL EMISSIONS COMPARISON FOR BEST BUY AND PROPOSED WHOLE FOODS

	Year 2021 Annual Emissions (pound per day)				Year 2021 Annual Emissions (tons per year)			
	ROG	**NO_X**	**PM_{10}**	**$PM_{2.5}$**	**ROG**	**NO_X**	**PM_{10}**	**$PM_{2.5}$**
Whole Foods	10.1	38.1	16.7	4.7	1.8	7.0	3.0	0.9
Best Buy	4.5	13.0	5.4	1.5	0.8	2.4	1.0	0.3
Incremental Increase	**5.6**	**25.1**	**11.3**	**3.2**	**1.0**	**4.6**	**2.1**	**0.6**
BAAQMD Thresholds	54	54	82	54	10	10	15	10
Over Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**

ABBREVIATIONS:

ROG = reactive organic gases; NO_X = oxides of nitrogen; PM_{10} = particulate matter with diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with diameter equal to or less than 2.5 microns.

Appellants focus on Diesel Particulate Matter ("DPM"). That TAC is represented as PM_{10} in the table above. Whole Foods' DPM emissions would be about five times less than the significance threshold when viewed in isolation, and more than seven times less as a net increase over Best Buy. The Project's $PM_{2.5}$ emissions—which BAAQMD treats as a TAC—would similarly be more than eleven times below the significance threshold, and over sixteen and a half times below the threshold as a net increase.

ESA also determined the increased cancer risk probability and annual average $PM_{2.5}$ concentrations at the daycare center and the "maximally exposed individual resident", aka MEIR, locations. Like the operational emissions analysis, the data is significantly below the significance thresholds for projects like this one that are within the Air Pollutant Exposure Zone.

TABLE 2
MODELED MAXIMUM INCREASE IN CANCER RISK AND ANNUAL AVERAGE $PM_{2.5}$ CONCENTRATIONS AT THE MEIR AND CHILD CARE CENTER

Receptor	**Receptor Group Age**	**Cancer Risk (in 1 million)**	**$PM_{2.5}$ Concentration ($\mu g/m^3$)**
MEIR (Residence on Geary Blvd)	Third trimester to 30 years	2.68	0.003
Child Care Center	Age 0 to 16 years	2.38	0.007
APEZ Thresholds	All groups	7	0.2

ABBREVIATIONS:

$PM_{2.5}$ = particulate matter with diameter equal to or less than 2.5 microns; $\mu g/m^3$ = micrograms per cubic meter.

SOURCE: ESA, 2020. See Appendix A, *Emissions and Health Risk Calculations.*

Cancer risk levels are roughly two and a half to three times below the significance threshold, and annual average $PM_{2.5}$ levels are twenty eight to sixty six times below the significance threshold.

E. Conclusion

The Project would add a Whole Foods Market in an empty approximately 50,000 square foot space. Whole Foods has a demonstrated track record of union construction labor and local hiring, and its philanthropic efforts support a diverse range of San Francisco non-profits, community groups, and schools. It will implement a comprehensive community partnership with the Booker T. Washington Community Services Center. Supported by merchants, nearby residents, and construction labor, the Project will provide a much-needed new grocery store, restaurant, and coffee shop at the City Center mall.

Appellants have not raised a credible question of fact or presented any substantial evidence that could reasonably support a finding that the Project would have a significant environmental impact. Their efforts to undermine the City's loading methodology fall short when a separate study relying on project size instead of reported date and sales volume—as Appellants recommend—falls within the same projected truck loading counts. The site is uniquely constructed to avoid impacts within the public right of way. And finally, a screening-level air quality analysis demonstrates the Project's impacts will be comfortably below any significance threshold. Their appeal should be denied.

Sincerely,

REUBEN, JUNIUS & ROSE, LLP

Mark Loper

Exhibits:

A	-	Support Letters and Signatures
B	-	Lot E Loading Dock Turning Exhibit, July 29, 2019
C	-	Freight and Passenger Loading Demand and Construction Traffic Memo, Kittelson & Associates, October 26, 2020
D	-	Air Quality Technical Memorandum – 2675 Geary Boulevard Project, October 30, 2020
E	-	First Source Hiring Affidavit, Whole Foods, May 15, 2020

[1] 14 Cal. Code. Regs. § 15064(f).
[2] 14 Cal. Code. Regs. § 15064(f)(5).
[3] 14 Cal. Code. Regs. § 15064(f)(5).
[4] Davidon Homes v. City of San Jose (1997) 54 Cal.App.4th 106, 117-118.
[5] CREED-21 v. City of San Diego (2005) 234 Cal.App.4th 488, 504.

Exhibit A

ERIC F. ANDERSON, INC.
General Building Contractor
SINCE 1945

April 6, 2020

President Joel Koppel
Planning Commission
City Hall
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

RE: Applicant 2019-004110CUA
Whole Foods Market Project at Geary / Masonic

Dear Mr. Koppel,

I am writing this letter in support of Whole Foods Market and to share our experience of their strong support of the trade unions. My company, Eric F. Anderson, Inc (EFA), is a third-generation, family and women-owned General Building Contractor, founded in 1945. We have been building grocery stores in San Francisco and Northern California for 75 years. Eric F. Anderson, Inc. is a proud member of the Northern California Carpenters Union.

EFA has had a strong partnership with Whole Foods Market since they first expanded to California in the 1980's. My father, Donald K. Anderson, built a trusted relationship with Whole Foods Market that has continued to this day. The first store we built for them was in Mill Valley in 1990. At that time, Whole Foods Market had three stores in California – Palo Alto, Berkeley and Mill Valley. They continued to partner with us on dozens of new stores from California to Nevada.

Whole Foods Market has always been a leader in quality – both in the operation and construction of their stores. That drive for quality has resulted in hiring union contractors for the construction and remodeling of their stores. Not only has Eric F. Anderson, Inc. been a partner, but they have also supported and advocated for other union GC's and key union subcontractor trades, including electrical, mechanical and plumbing.

Whole Foods Market has contributed millions of dollars and hundreds of jobs to support the trade unions. In just the past 15 years, Eric F. Anderson, Inc. has been the negotiated General Contractor for $50 million of new stores, remodels and service. They have hired EFA for every type of construction – from small service jobs to department remodels to new stores, and everything in between. On new stores in the past 15 years, Whole Food has spent over $36 million and over $15 million on remodels and service.

Of just these projects, over $23.5 million has been spent on union trades, including: Cast-in-Place Concrete, Metal Stud Framing and Drywall, Acoustical Ceilings, Painting, Electrical, HVAC, Plumbing, and Refrigeration.

We understand that San Francisco strongly supports unions more than other cities and San Francisco projects utilize 100% union labor. It should be noted that Whole Foods Market has been a strong supporter of union labor, regardless of the location and local union requirements. Whole Foods Market has used union labor for projects in Berkeley, Oakland, San Jose, Campbell, Cupertino, San Mateo, Monterey, Los Gatos, Walnut Creek, Fremont, Palo Alto, San Rafael, San Ramon, Roseville and Reno NV.

Whole Foods Market has contributed substantially to our success as a General Contractor as well as our partnered union subcontractors. I can't share enough how much we respect them as a business and trusted partner.

Please feel free to reach out to me for more information or data regarding the number of projects over the years. We support this project 100% and look forward to have our union members and partners on the job.

If you have any questions, please do not hesitate to contact me at (510) 717-8477.

Sincerely,

Kristin Anderson

Kristin Anderson
Eric F. Anderson, Inc.
President/CEO
kristin@efainc.com

WOMEN OWNED
CERTIFIED BY | WOMEN'S BUSINESS ENTERPRISE NATIONAL COUNCIL

Eric F. Anderson, Inc. is a WBENC-Certified Women-Owned Business Enterprise

March 12, 2020

Dear President Koppel and Members of the San Francisco Planning Commission,

The primary mission of the Fillmore Merchants Associations is to protect and preserve the wide variety of merchants on our corridor. Our aim is to improve the business climate in the nieghborhood and therefor the City in any way we can.

With this in mind, the FMA is in support of Whole Foods's application to bring a new grocery store to the City Center at Geary and Masonic. We believe this project is in-step with the neighborhoods' wants and needs, and remains consistent with the historic use of the City Center shopping center.

In addition, Whole Foods Market provides high quality, fresh produce, raw, natural and organic meats, dairy and other food and household items, and encourages and promotes a healthy lifestyle. This particular space is a very large footprint with rare access to parking, is centrally located, and would be an ideal location for a grocery store of this nature.

Please do not delay in approving this project.

Sincerely,

Vas Kiniris

Executive Director

Fillmore Merchants Association

(510) 333-0401

235 Montgomery St., Ste. 760, San Francisco, CA 94104
tel: 415.392.4520 • fax: 415.392.0485
sfchamber.com • twitter: @sf_chamber

May 5, 2020

President Koppel and San Francisco Planning Commission
San Francisco City Hall
1 Dr. Carlton B. Goodlett Place
San Francisco, CA

Re: Whole Foods at City Center

Dear President Koppel and Members of the San Francisco Planning Commission,

The San Francisco Chamber of Commerce strives to advocate for a thriving business community in our merchant corridors for our small business owners, employees, and residents of San Francisco. With this in mind, and under the light of these uncertain times, **we offer our support of Whole Foods Market's application for a Conditional Use Permit for the City Center at 2675 Geary Blvd.**

The City Center shopping center is unique in its ability to make national retailers accessible to residents. From the center's historic use as a Sears, to current tenants like Ulta, Target, the recently-approved PetSmart, and the former Best Buy, the City Center is an appropriate location for retailers like Whole Foods that require the large space that is rarely available in San Francisco. The San Francisco Planning Commission has a history of approving formula retail CUPs at the City Center, and we believe that Whole Foods would make a great, and needed, addition to this area.

Through the COVID-19 pandemic, we have all come to understand the importance of having immediate access to fresh, organic, and healthy food options. In a moment when crowded grocery stores and long lines are providing high levels of anxiety for our residents, the importance of more options that are close to home and easily accessible has become more critical than ever.

As San Francisco begins to contemplate the slow, difficult process of economic recovery, it is more important than ever to focus on opportunities for employment in the City. This large project will provide many jobs during the construction phase, and will permanently employ dozens of San Franciscans upon its opening.

The San Francisco Chamber of Commerce believes that this location is appropriate for a Whole Foods Market, and this project will provide much-needed services and jobs at a time when San Francisco needs them most. Please do not delay in approving this important project.

Respectfully,

Jay Cheng
Public Policy Director
San Francisco Chamber of Commerce

From: Alfred Sodini <ducha931@aol.com>
Sent: Monday, May 20, 2019 1:56 PM
To: myrna.melgar@sfgov.org
Cc: joel.koppel@sfgov.org; planning@rodneyfong.com; richhillissf@gmail.com; milicent.johnson@sfgov.org; kathrin.moore@sfgov.org; dennis.richards@sfgov.org
Subject: Whole Foods at the City Center Shopping Mall

Dear President Melgar and Members of the Planning Commission:

I represent the Anza Vista Neighborhood Association which is directly across from the City Center Shopping Mall at 2675 Geary Blvd. I would like to take this opportunity to voice our strong support of Whole Foods's application to open a new location at the Center.

Unique within San Francisco, the City Center Shopping Mall features large footprint retail spaces which are ideal for formula retailers. From its very start, the Center has had a long history of housing formula retailers. We believe that Whole Foods is in step with that history and that they would make an ideal tenant for the former Best Buy location. As many retailers are moving their businesses online, grocery stores remain, and will always be, a critical element to any neighborhood's success.

While there are several large chain grocers in the general area, we believe Whole Foods will offer a unique choice and will generally benefit those who live and work in the Anza Vista and surrounding neighborhoods.

We look forward to Whole Foods opening and serving our community. Whole Foods has our neighborhood's support and we welcome your approval of this application.

Sincerely,

Al Sodini

President

Anza Vista Neighborhood Association

****

6/9/2019

YES!

I support bringing a new Whole Foods Market to the City Center at 2675 Geary Blvd at Masonic Ave. This location is well-suited for and in need of a high quality grocer, and the neighborhood would benefit greatly from the variety and quality Whole Foods is known for.

NAME	ZIP CODE	EMAIL (optional)
Eduardo Rangel	94110	Eduardo_Rangel777@yahoo.com
Anthony Lang	94110	
Orkid	94110	
Pepe	94110	it's a good idea, [redacted]
Mariana	94115	mgarzaescamilla@gmail.com
Maria Jose	94115	mariapsecbinc@gmail.com
Donna Robles	94115	dmrobles2@icloud.com
Michael Shagalov	94131	
Darion Lopez	94114	
Rebecca Hobbs	94121	hobbs.rebeccasarah@gmai
Will Johnson	94121	
Katie Michel	94121	
Monica Menor	94107	

YES!

I support bringing a new Whole Foods Market to the City Center at 2675 Geary Blvd at Masonic Ave. This location is well-suited for and in need of a high quality grocer, and the neighborhood would benefit greatly from the variety and quality Whole Foods is known for.

NAME	ZIP CODE	EMAIL (optional)
Scott Torres	94103	
Ry Smith	9418	
	95050	
Peter Fredrickson	94107	
	94110	
	94112	
	94103	
Max Overstreet	94134	
J. Alexander Gonzales Jr.	94134	

YES!

I support bringing a new Whole Foods Market to the City Center at 2675 Geary Blvd at Masonic Ave. This location is well-suited for and in need of a high quality grocer, and the neighborhood would benefit greatly from the variety and quality Whole Foods is known for.

NAME	ZIP CODE	EMAIL (optional)
Elsy Tayer	94103	
Salma-Ali Saleh	94110	
Carlos Perez	94103	
Evade Mlic	94404	
JOAN BANK	94110	
CT Notaro	94103	
Richard Copeland	94107	
Yen Lai	94158	
Cassie Moorhead	94107	
Drew Fritter	94116	
Tony Liang	94103	
Susan Eubanks	94131	
Idonnah Hipolito	94014	

YES!

I support bringing a new Whole Foods Market to the City Center at 2675 Geary Blvd at Masonic Ave. This location is well-suited for and in need of a high quality grocer, and the neighborhood would benefit greatly from the variety and quality Whole Foods is known for.

NAME	ZIP CODE	EMAIL (optional)
Michelle Parker	94121	
Roisin Hunt	94121	
Robert Espinosa	94112	
Nikki Lee	94122	
Sahil Gupta	94015	
DAN CRUZ	94124	
Manno Letschert	94107	

Sample Support Cards

Show your support.

Whole Foods Market is seeking approval from the San Francisco Planning Department to operate our new store, and your support can help make our plan a reality!

☑ Yes! I support bringing a new Whole Foods Market to the City Center at 2675 Geary Blvd. at Masonic Ave.

Name: (please print) Oranan Champanya

Zip code: 94107

857 Montgomery Street
San Francisco, CA 94133

Show your support.

Whole Foods Market is seeking approval from the San Francisco Planning Department to operate our new store, and your support can help make our plan a reality!

☑ Yes! I support bringing a new Whole Foods Market to the City Center at 2675 Geary Blvd. at Masonic Ave.

Name: (please print) Janice Hill

Zip code: 94525

857 Montgomery Street
San Francisco, CA 94133

Show your support.

Whole Foods Market is seeking approval from the San Francisco Planning Department to operate our new store, and your support can help make our plan a reality!

☑ Yes! I support bringing a new Whole Foods Market to the City Center at 2675 Geary Blvd. at Masonic Ave.

Name: *(please print)* MARY THOMPSON

Zip code: 95968

857 Montgomery Street
San Francisco, CA 94133

Show your support.

Whole Foods Market is seeking approval from the San Francisco Planning Department to operate our new store, and your support can help make our plan a reality!

☑ Yes! I support bringing a new Whole Foods Market to the City Center at 2675 Geary Blvd. at Masonic Ave.

Name: *(please print)* Veronica Garcia

Zip code: 94705

857 Montgomery Street
San Francisco, CA 94133

Show your support.

Whole Foods Market is seeking approval from the San Francisco Planning Department to operate our new store, and your support can help make our plan a reality!

☑ Yes! I support bringing a new Whole Foods Market to the City Center at 2675 Geary Blvd. at Masonic Ave.

Name: Nadia Sajle
(please print)

Zip code: 93277

857 Montgomery Street
San Francisco, CA 94133

Show your support.

Whole Foods Market is seeking approval from the San Francisco Planning Department to operate our new store, and your support can help make our plan a reality!

☑ Yes! I support bringing a new Whole Foods Market to the City Center at 2675 Geary Blvd. at Masonic Ave.

Name: Sam Wren
(please print)

Zip code: 94103

857 Montgomery Street
San Francisco, CA 94133

Show your support.

Whole Foods Market is seeking approval from the San Francisco Planning Department to operate our new store, and your support can help make our plan a reality!

☑ Yes! I support bringing a new Whole Foods Market to the City Center at 2675 Geary Blvd. at Masonic Ave.

Name: Ayrton Bryan
(please print)

Zip code: 94590

857 Montgomery Street
San Francisco, CA 94133

Show your support.

Whole Foods Market is seeking approval from the San Francisco Planning Department to operate our new store, and your support can help make our plan a reality!

☑ Yes! I support bringing a new Whole Foods Market to the City Center at 2675 Geary Blvd. at Masonic Ave.

Name:
(please print)

Zip code: 94101

857 Montgomery Street
San Francisco, CA 94133

Spreadsheet of support card signatures

First Name	Last Name	Zip Code	Event
Kesha	Rankin	95008	Pride
Nancy	Ford	94707	Pride
Anonymous		95758	Pride
Beth	Schuy	94111	Pride
Judith	McDonald	94124	Pride
Brianti	W	N/A	Pride
Amber	Gray	94115	Pride
Peter	Hardy	94124	Pride
Randi	G	94607	Pride
Eric	Gillespie	94607	Pride
Margherita	Goppolino	3011	Pride
Jason	Hoa	94602	Pride
Diana	Greer	94133	Pride
Judy		94112	Pride
Carco	Ricardo	94110	Pride
Beth	Schutz	94117	Pride
Laurel		94114	Pride
Catherine	Chin	94114	Pride
Orizarra		95116	Pride
April		95123	Pride
Greg	O'Brien	94013	Pride
Erica	Hagle	94063	Pride
Joann	Taylor	95112	Pride
Marius	Aniexander	94132	Pride
Kat	Scheibner	98506	Pride
Gloria	Nguyen	94022	Pride
Carlton		94909	Pride
Monalisa	Carter	94166	Pride
Karen	S	94134	Pride
Natalie	Gee	94134	Pride
Dre		94134	Pride
Fernando	Lunan	94158	Pride
Jay R.	Fields	94158	Pride
Andy	Escobar	94309	Pride
Debra	Benedict	94103	Pride
Maxx	T	94541	Pride
Nersow	Henaxuno	95110	Pride
Ser	Anzoategui	90042	Pride
Orawan	Chanpanya	94107	Pride
Yiouue	Fletcher	N/A	Pride
Jessica	Kasanitsky	94124	Pride
Jake	M	94117	Pride
Alberto	Sera	94705	Pride
Araceli	Smith	94521	Pride
Not Legible		94704	Pride
Jason	Lee	93277	Pride

Gabe	Teen	94518	Pride
Not Legible		92104	Pride
Rafael	Chang	94605	Pride
Amy	Meyers	94044	Pride
Louise	Fischer	94102	Pride
Not Legible		94121	Pride
Ayrton	Bryan	94590	Pride
Nadia	Su-ye	93277	Pride
Sam	Wren	94103	Pride
Mary	Thompson	95968	Pride
Veronica	Garcia	94705	Pride
Janice	Hill	94525	Pride
Diana	Cov	94117	Pride
Eric	Chong	94043	Pride
Christopher	Herrera	94122	Pride

Fw: Letter of support for Whole Foods 2020

Mark Loper <mloper@reubenlaw.com>
Mon 5/18/2020 8:00 AM

To: May, Christopher (CPC) <christopher.may@sfgov.org>

Chris, following up on the email I sent Friday with our sponsor brief and support exhibits. Here's a support letter from the Geary Merchants.

Thanks and hope you had a nice weekend,

Mark

Mark Loper, Partner
O. (415) 567-9000
C. (510) 414-6445
mloper@reubenlaw.com
www.reubenlaw.com

SF Office:
One Bush Street, Suite 600
San Francisco, CA 94104

Oakland Office:
827 Broadway, Suite 205
Oakland, CA 94607

From: Taylor Jordan <Taylor@lh-pa.com>
Sent: Saturday, May 16, 2020 6:07 PM
To: Mark Loper <mloper@reubenlaw.com>
Subject: Fw: Letter of support for Whole Foods 2020

From: David Heller <david@beautynetwork.com>
Sent: Saturday, May 16, 2020 4:37 PM
To: Taylor Jordan <Taylor@lh-pa.com>
Subject: Letter of support for Whole Foods 2020

Over the past 73 years, the Greater Geary Boulevard Merchants Association has worked hard to serve our merchants and help the Geary merchant corridor, from Van Ness Avenue to the Pacific Ocean, thrive and provide a wide variety of shops, services, and restaurants to San Franciscans in a variety of neighborhoods.

With this rich history in mind, the Greater Geary Boulevard Merchants Association urges the SF Planning Commission to support Whole Foods' effort to bring a new grocery store to the City Center shopping center at Geary Boulevard and Masonic Avenue. We believe this project is in-step with the neighborhood's wants and needs, and remains consistent with the historic use of the City Center.

The retail space at the City Center has a very large footprint with access to parking. It is also centrally located and would be an ideal location for a grocery store of this nature.

Whole Foods provides high-quality, fresh produce, natural and organic meats and dairy, and other food and household items. The store actively promotes a healthy lifestyle.

Please support Whole Food's effort to open a location at the City Center.

David Heller

David Heller, President
Greater Geary Boulevard Merchants
and Property Owners Association
P.O. Box 210747
San Francisco, CA 94121

415.387.1477 Phone
415.387.1324 Fax
415.517.2573 Cell

david@beautynetwork.com

Click here to visit our website: www.gearyblvd.org

FOOD RUNNERS
RELAYING EXCESS FOOD

Re: Proposed Whole Foods City Center Project

Members of the San Francisco Board of Supervisors,

On behalf of Food Runners, I am writing to express our full support for the proposed Whole Foods Market project located at the City Center, 2675 Geary Blvd. The proposed project will be a meaningful addition to the neighborhood by offering countless benefits that will enrich the community—from workforce opportunities to charitable partnerships.

The COVID-19 pandemic has caused unprecedented economic devastation in our City and has impacted many individuals, families, and communities, especially people of color. The proposed new store location for Whole Foods Market would create employment opportunities for San Francisco residents and aid our City's economic recovery efforts. Moreover, Whole Foods has exhibited an ongoing commitment to hiring a local and diverse workforce and offers competitive wages along with full-time employment options for many of its employees.

Beyond being an important economic recovery tool for our City, the proposed project will also contribute to the development of more charitable partnerships between Whole Foods Market and San Francisco's incredible community-based organizations. In 2019 alone, Whole Foods raised or donated the equivalent of over $2,00,000 to local nonprofits in San Francisco in addition to supporting communities through food access efforts since the start of this pandemic. Food Runners receives donations of excess perishable and prepared food from every Whole Foods Market in the city several times a week. This amounts to 100's of tons of donated food each year. I will let you do the calculation. Feeding America estimates that a pound of donated food is worth $1.62. One ton of food is 2,000 pounds….what does your calculator say? By welcoming this new store location into the area, we will be able to continue to explore more opportunities for partnership and community engagement, especially in the Western Addition and Fillmore District.

Food Runners supports Collective Impact's belief that this location will be a benefit to the Western Addition community and we urge members of the San Francisco Board of Supervisors to allow this project to move forward. Thank you for your consideration.

In Community,
Linda Murley, Executive Director
Food Runners

October 23, 2020

San Francisco City Hall
ATTN: San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Re: Proposed Whole Foods Market City Center Project

Members of the San Francisco Board of Supervisors:

On behalf of CityTeam, I am writing to demonstrate our full support for the proposed Whole Foods Market project, located at San Francisco's City Center, 2675 Geary Blvd. CityTeam has been serving San Francisco's communities through our various programs that are focused on relieving the challenges that low-income families face in putting food on the table and too often simply making ends meet. Providing hot meals and nutritious food is a core service we offer – one in which we heavily rely on our partners, like Whole Foods Market, to help us accomplish. Allowing Whole Foods Market to expand locally in San Francisco will only deepen our partnership and develop our food access services even further.

Due to the far-reaching economic impacts of COVID-19, we have experienced a drastic increase in the number of families and individuals that are in need of our services. We are able to meet the rising demand, in part, through the on-going food donations we receive from Whole Foods store locations throughout San Francisco. This partnership allows us to continue feeding our most vulnerable populations out of our SOMA location and via mobile deliveries in Hunter's Point. The proposed Whole Foods project will not only aid our City's economic recovery efforts as a whole, but will also directly provide our organization with an additional vital resource for collecting food to offer to low-income communities.

Whole Foods also recently donated a refrigerated van to our cause that has immensely aided our efforts in transporting fresh food to all corners of the City. This donation has become a critical component in expanding our services by granting us the ability to pick more food than we could previously, and improving our efforts to ameliorate the ever-increasing need for food access in San Francisco. We have seen firsthand the active role each and every Whole Foods Market store plays in supporting the community, and the generous approach the company takes to local charitable giving.

We are proud to be Whole Foods Market's local grocery rescue partners and look forward to strengthening this partnership further with the common goal of serving our community. For this reason, we strongly urge the San Francisco Board of Supervisors to approve the proposed City Center project.

Thank you for your consideration,

Christian Huang
Executive Director, CityTeam San Francisco

Glen Peterson
President and CEO, CityTeam

COLLECTIVE IMPACT

MAGIC ZONE

San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, SF, CA 94102
Re: Proposed Whole Foods City Center Project

Members of the Board of Supervisors,

On Behalf of myself and the team at Collective Impact/ Magic Zone I am writing to express our full support for the proposed Whole Food Market project located at City Center, 2675 Geary Blvd. Collective Impact has long been focused on providing youth and families with the tools, resources and support they need to succeed. We provide programs for youth in the Western Addition/Fillmore addressing disparities facing people of color and supporting the African American community. As someone born and raised in this community, I believe this project will be a meaningful addition to the neighborhood and the individuals we serve by offering benefits and opportunities that will enrich the community - from employment opportunities to the contributions of Whole Foods.

COVID-19 has had a tremendous impact on the economy, which means, families, individuals and communities like the Fillmore have been hard hit. The pandemic made a bad situation worse, people of color were struggling and suffering before COVID-19, Black residents experienced unemployment at nearly three times the rate of the citywide average. At Collective Impact we have seen first hand the negative effect on the African American community and know the need for real solutions. The proposed new store location for Whole Foods Market offers hope and could create hundreds of employment opportunities for San Francisco residents and help with the City's recovery efforts. Through our summer internships and Opportunities for All, we've seen firsthand Whole Foods commitment to hiring a local and diverse workforce.

We believe that the proposed project offers more than jobs, but contributions and a partnership that benefits local community-based organizations. In 2019 Whole foods donated and raised money for nonprofits and since the pandemic has provided access to food for communities. I am hopeful that the store will provide opportunities to expand and explore new opportunities for partnership and community engagement, especially in my community.

Collective Impact is based out of the Ella Hill Hutch Community center and home to Mo' MAGIC and Magic Zone and we believe this location has the potential to benefit the community, our youth and their families, we urge the San Francisco Board of Supervisors to allow this project to move forward. Thanks for your consideration.

Sincerely,

James Spingola, Executive Director, Collective Impact/ Magic Zone

Noivember 2, 2020

Dear President Yee and Members of the San Francisco Board of Supervisors,

The Fillmore Merchants Association continues its ongoing support for Whole Foods Market at the City Center at Geary and Masonic.

The primary mission of the Fillmore Merchant Association is to protect and preserve the wide variety of merchants on our corridor. Our aim is to improve the business climate in the neighborhood and the City in any way we can.

Because of this, the FMA is in strong support of Whole Foods Market's application to bring a new grocery store to the City Center. We believe this project is aligned with the neighborhood's goals and desires. We also believe this project is a perfect fit for the City Center, given its historic uses, large floor plans, and generous parking lot.

Whole Foods Market is an excellent resource for high quality, fresh produce, raw, natural and organic meats, dairy and other food and household items, and encourages and promotes a healthy lifestyle. This, in addition to bringing dozens of new jobs to San Francisco during a pandemic, make this project beneficial and desirable all the way around.

Please support this important project.

Yours Sincerely,

Vas Kiniris
Executive Director
Fillmore Merchants Association

(510) 333-0401

Fw: Greater Geary Boulevard Merchants Support Letter.

Taylor Jordan <Taylor@lh-pa.com>

Fri 11/6/2020 9:49 AM

To: Mark Loper <mloper@reubenlaw.com>; Alex Tourk <tourk@gfpublicaffairs.com>; Hailey Smith <hailey@gfpublicaffairs.com>; Brian Bacharach (Consultant) <bbacharach@acadiarealty.com>; Rachel Kelly (CE CEN) <Rachel.Kelly@wholefoods.com>

From: David Heller <david@beautynetwork.com>
Sent: Thursday, November 5, 2020 5:23 PM
To: Taylor Jordan <Taylor@lh-pa.com>
Subject: Greater Geary Boulevard Merchants Support Letter.

Dear President Yee and Members of the San Francisco Board of Supervisors,

It is with strong conviction that the Greater Geary Blvd Merchant Association renews its support for Whole Foods Market at the City Center at Geary and Masonic.
Over the past 74 years, the Greater Geary Blvd Merchant Association has worked hard to serve our members and help the Geary merchant corridor, from Van Ness to the Ocean, thrive and provide a wide variety of shops, services, and restaurants to San Franciscans in a multitude of neighborhoods.
We believe, without hesitation, that this Whole Foods Market will help deliver on this mission.

We believe this project is in-step with the neighborhoods' wants and needs, and remains consistent with the historic use of the City Center shopping center.
In addition, Whole Foods Market provides high quality, fresh produce, raw, natural and organic meats, dairy and other food and household items, and encourages and promotes a healthy lifestyle. This particular space is a very large footprint with rare access to parking, is centrally located, and would be an ideal location for a grocery store of this nature.

Lastly, this project will bring dozens of new jobs to our community, at a time of great economic uncertainty. Simply stated, this project is the right fit for this neighborhood.
Please support this important project.

Sincerely,
David Heller, President

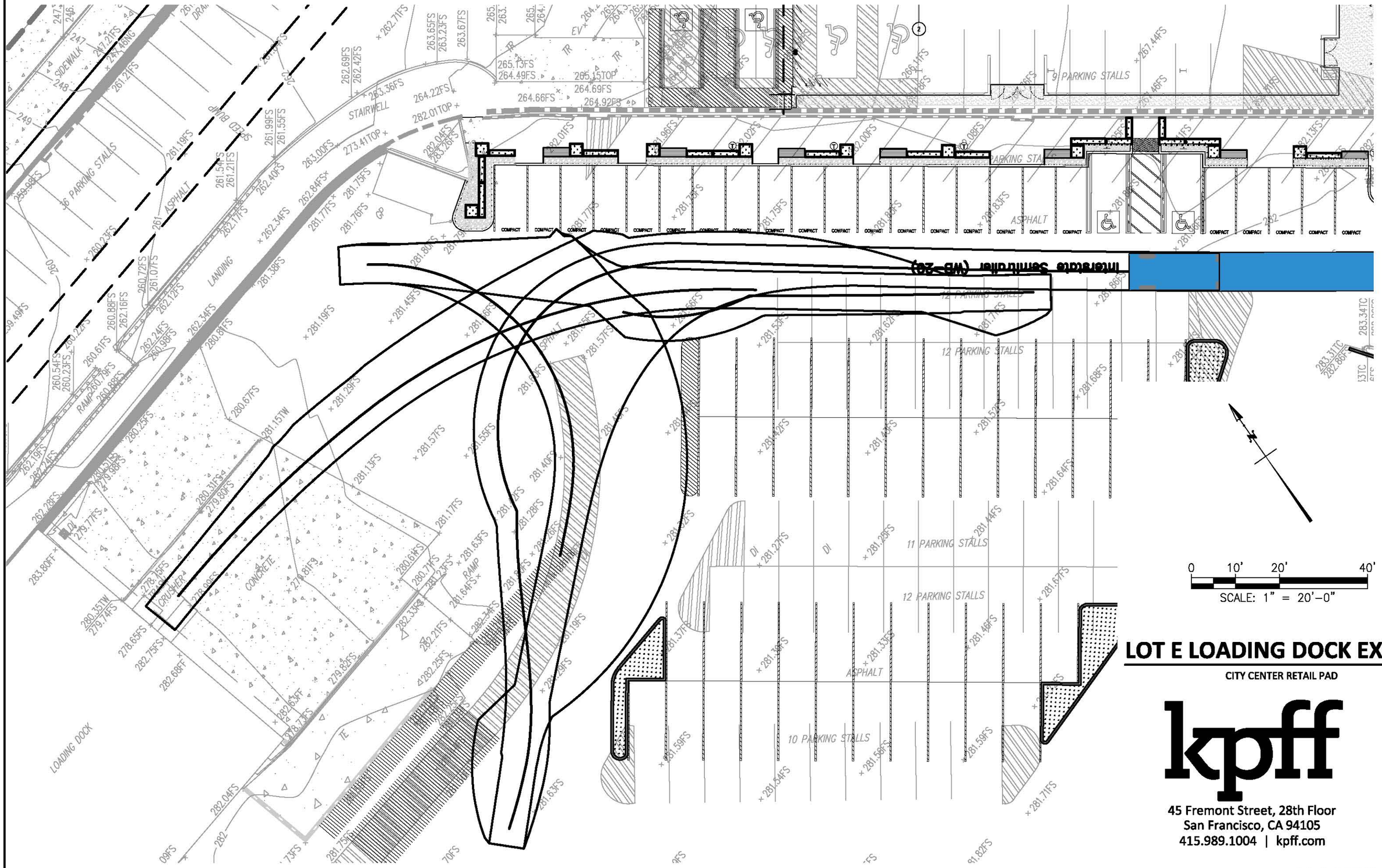
David Heller, President
Greater Geary Boulevard Merchants
and Property Owners Association
P.O. Box 210747
San Francisco, CA 94121

415.387.1477 Phone

david@beautynetwork.com

Click here to visit our website: www.gearyblvd.org

Exhibit B



0 10' 20' 40'

SCALE: 1" = 20'-0"

LOT E LOADING DOCK EXHIBIT

CITY CENTER RETAIL PAD

kpff

45 Fremont Street, 28th Floor
San Francisco, CA 94105
415.989.1004 | kpff.com

JOB NUMBER: 1500036

DATE: JULY 29, 2019

Exhibit C

KITTELSON & ASSOCIATES
155 GRAND AVENUE, SUITE 505
OAKLAND, CA 94612
P 510.839.1742 F 510.839.0871

MEMORANDUM

Date: October 26, 2020 Project #: 25485

To: Brian Bacharach
Acadia Realty Trust
411 Theodore Fremd Ave, Suite 300
Rye, NY 10580

From: Mike Alston, RSP: Amanda Leahy, AICP
Project: 2675 Geary CEQA Support
Subject: Freight and Passenger Loading Demand and Construction Traffic

INTRODUCTION

Kittelson & Associates, Inc. ("Kittelson") has been retained to provide technical analysis and support for the proposed 2675 Geary project ("proposed project"). In May 2020, the San Francisco Planning Department completed a transportation coordination memo (TCM) that evaluated potential transportation impacts of the project. This memorandum provides supplementary freight and passenger loading demand analysis and a discussion of expected construction traffic.

PROJECT DESCRIPTION

The project sponsor (Whole Foods Market) is proposing a grocery store, restaurant, and coffee bar at 2675 Geary Boulevard in the "City Center," an existing shopping center located at the southeast corner of Masonic Avenue and Geary Boulevard, in the Western Addition Neighborhood of San Francisco. Whole Foods Market would occupy a vacant retail space, formerly occupied by Best Buy (until 2017), above an existing Target store. The proposed project would include a 49,780-square-foot grocery store, a 3,320-square-foot restaurant, and a 1,190-square-foot coffee shop.

The proposed project does not include any changes to vehicle parking, bicycle parking, freight or passenger loading, driveway access, or onsite circulation. Additionally, no changes are proposed in the public right-of-way. Parking and passenger loading access would be provided in the existing Lot C, which includes 117 vehicle parking spaces (see site plan in Appendix A). Freight and commercial loading activity would take place in a loading bay in Lot E, which includes two loading spaces for the proposed project. Access to the loading docks would be provided through Lot E by a 40-foot-wide driveway on

O'Farrell Street east of Anza Vista Avenue. The project proposes interior tenant improvements with no excavation or exterior construction.

FREIGHT AND PASSENGER LOADING DEMAND

This section presents freight and passenger loading demand estimates in accordance with the *2019 Transportation Impact Analysis Guidelines for Environmental Review* (SF Guidelines) in comparison with the TCM findings.

Freight and Commercial Loading Demand

Freight loading demand consists of the number of freight delivery and service vehicle trips generated by a development.

TCM Estimates and Findings

The TCM estimated daily freight and commercial loading trips by relying on a comparison to an existing Whole Foods in San Francisco (located at 1765 California Street) for an estimate of commercial and freight loading demand. The TCM estimated commercial and freight loading demand to be equivalent with the 1765 California Street Whole Foods location, presented in Table 1.

Table 1: Freight Loading Demand Estimated in the May 2020 TCM

	65-foot Trucks	30-to 48-foot trucks	Other[1]	Total Daily Trips
Average	4	4	15	23
Daily Maximum	4	4	20	28

Source: San Francisco Planning Department and Whole Foods Market.

[1]Includes bobtail trucks and large or small vans.

The TCM also included a discussion of expected fleet mix and dwell times, estimating dwell times of one hour for 65-foot-long trucks and 30 minutes for all other delivery vehicles, resulting in 6.75 hours of total dwell time on an average day and 8 total hours on a "maximum day." The discussion also indicated that the City Center shopping center has no time restrictions on deliveries, and that deliveries would be handled from the parking lot rather than from the public right-of-way. Thus, the TCM concluded that supply was adequate and impacts to freight loading would be **less than significant.**

Estimates Based on SF Guidelines

The SF Guidelines provide data to estimate freight loading demand based on the size of each land use and corresponding truck trip generation rate (the rates are specific to each land use). Table 2 provides estimated freight loading and service vehicle demand based on the SF Guidelines rates and methodology.

Table 2: Freight Loading Demand based on SF Guidelines Rates and Methodology

Land Use	Size (Square Feet)	Turnover Rate (R Value)	Trips		Demand	
			Daily Trips	Peak Hour Trips	Peak Hour Demand (Number of Spaces)	Rounded Peak Hour Demand
Supermarket	49,780	0.22[1]	11.0	1.5	0.6	1.0
Restaurant	3,320	3.6	11.9	1.6	0.6	1.0
Coffee Shop	1,190	3.6	4.2	0.6	0.2	1.0
Total	**54,290**	**-**	**27.1**	**3.2**	**-**	**3**

Source: Kittelson & Associates, 2020; San Francisco Planning Department, 2019
[1]Trips were estimated using the *composite retail* rate from the SF Guidelines, a category which includes but is not limited to personal services, wholesale, apparel, drug stores, and specialty shops.
Demand Equation: Daily Trips = (SF/1,000) * R; Average Hour = (SF/1,000) * R/9/2.4; Peak Hour = (GSF/1,000) * (R * 1.25)/9/2.4

Applying the SF Guidelines freight loading demand rates, expected freight loading activity is similar to the TCM estimates, with 27.1 daily trips and demand for three spaces in the peak hour of freight loading. The daily demand estimate is on par with the "daily maximum" estimates of 28 trips provided in the TCM. The SF Guidelines do not provide any more detailed information that would conflict with the fleet mix and dwell time information provided in the TCM, which includes:

- 70 to 75 percent of product mix is delivered in 65-foot-long trucks.
- A dwell time of 60 minutes per full load and 30 minutes for a half load or for other loading and delivery vehicles.

Passenger Loading Demand

TCM Estimates and Findings

The TCM estimated 14 trips by taxi or transportation network company in the weekday p.m. peak hour but did not explicitly discuss or analyze the estimated total number of passenger loading trips. (Passenger loading is comprised of commercial trips like taxis and TNCs and of private, high-occupancy vehicle trips). The memo explains that because there is adequate space in the existing Lot C, passenger loading would not result in secondary effects to other modes of travel.

SF Guidelines Estimates

The SF Guidelines provide passenger loading percentages based on land use type and geography/place type. Table 3 provides the average passenger loading demand for any one minute of the peak hour throughout the average peak period.[1] As shown in the table, the proposed project would generate demand for one passenger loading space.

CONSTRUCTION

The proposed project will not require any exterior construction. No heavy construction vehicles will be needed and no construction traffic routing is necessary. Construction contractors for the interior tenant improvements (i.e., vendors) will have access to all 117 vehicle parking spaces within Lot C in front of the store, which will eventually serve the proposed project.

[1] The SF Guidelines advise estimating demand for any one minute of the peak hour throughout the average peak period for project sites like the proposed project that are is not located along a non-center running public transit rapid network route or unprotected bicycle facility (e.g., no safe hit post, parking/loading in between, or raised sidewalk). For such sites, the appropriate estimate would be for any one minute of the peak 15 minutes of the average peak period.

Table 3: Proposed Project Passenger Loading Demand, P.M. Peak Hour

Land Use	Size (Square Feet)	Person Trips	Loading Mode Type Percentage (L)	Loading Demand (Spaces)[1]
Supermarket	49,780	1,079	3%	0.5
Restaurant	3,320	269	3%	0.1
Coffee Shop	1,190	96	3%	0.1
Total – Proposed Project	**54,290**	**1,444**	-	**0.7**
Rounded Total				**1.0**

Source: 2019 TIA Guidelines

1 Peak hour spaces of passenger loading demand = $\left[\frac{P*L*D}{60}\right]$

P = Person trip generated by the land use during the p.m. peak hour based on the land use type's trip generation rate and the amount of land use

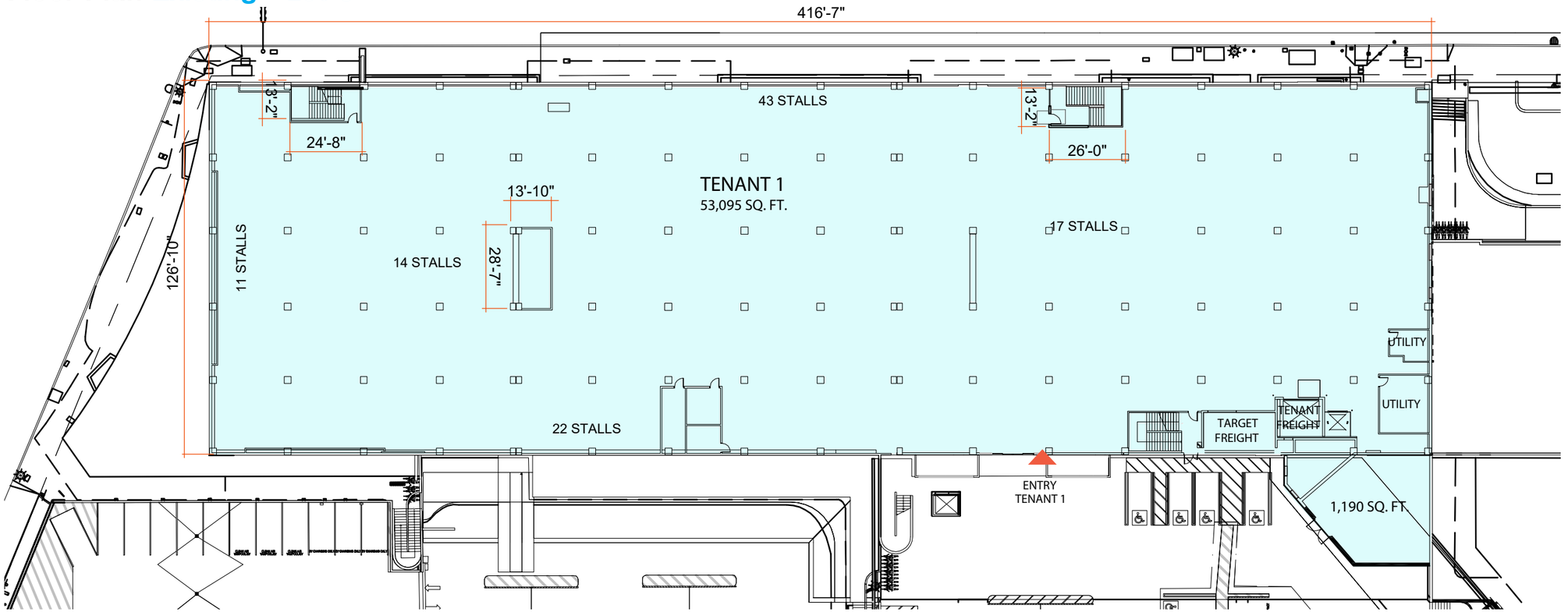
L = Loading mode type percentage (mode split of all person trips going to a project site involving passenger loading occurring at the curb) for the land use and place type

D = The average stop duration is assumed to be 1 minute

APPENDIX A: SITE PLAN

Context Plans/Views Lot C

Floor Plan Existing - Lot C

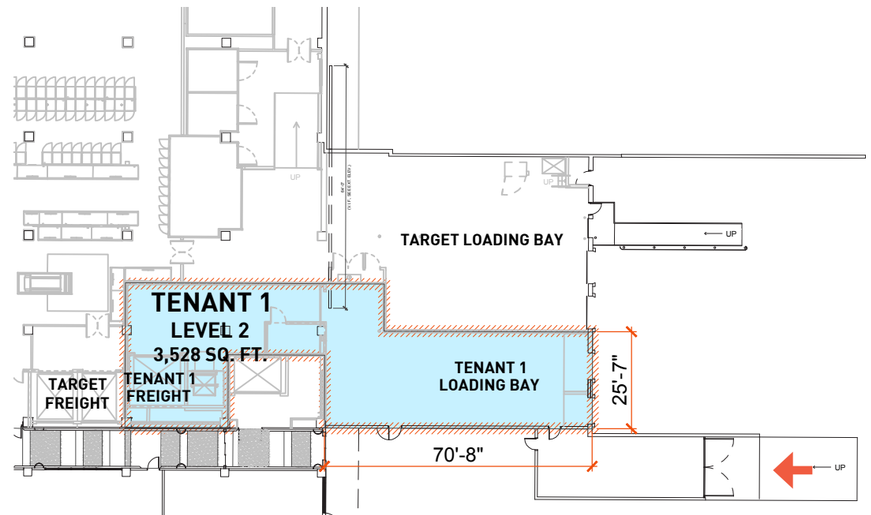


SALES LEVEL

SF TOTALS (GROSS FLOOR AREA)

RETAIL 53,095 SF
RETAIL SHED 1,190 SF
DOCK LEVEL 3,528 SF

TOTAL 57,813 SF

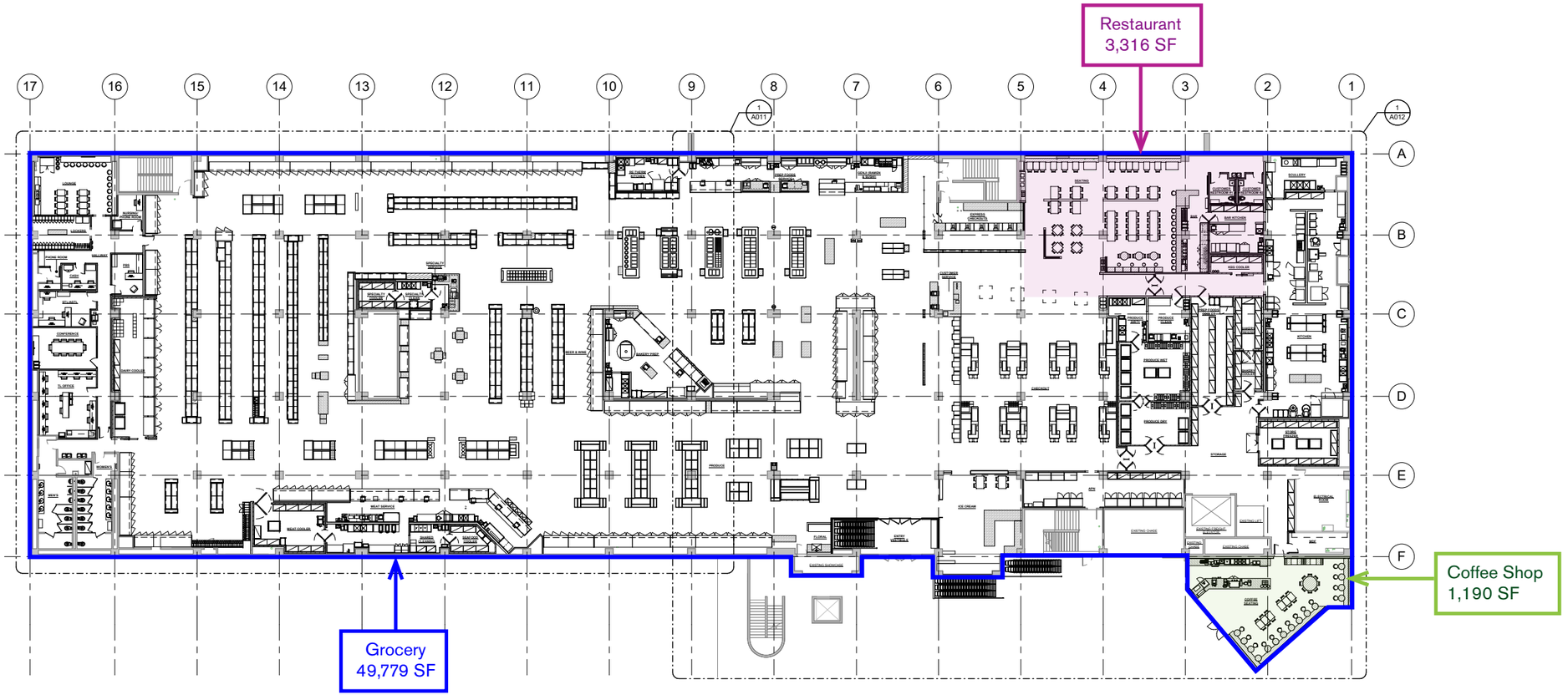


DOCK LEVEL

SCALE 1" = 40'

0 10 20 40

Floor Plan Proposed - Whole Foods



SF TOTALS

Street Level

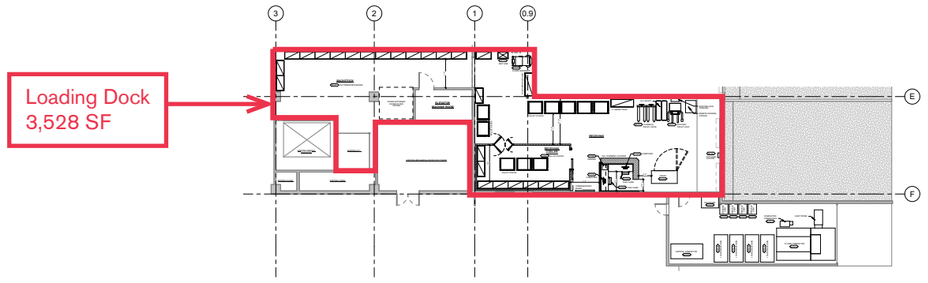
- Grocery 49,779 SF
- Coffee Shop 1,190 SF
- Restaurant 3,316 SF

Sub Total 54,285 SF

Loading Dock Level

- Loading Dock 3,528 SF

TOTAL: 57,813 SF



SCALE 1" = 40'

0 10 20 40

Exhibit D

ESA 50 YEARS 1969-2019

550 Kearny Street
Suite 800
San Francisco, CA 94108
415.896.5900 phone
415.896.0332 fax

esassoc.com

memorandum

date	October 30, 2020
to	Brian Bacharach, Acadia Realty
cc	Mark Loper, Reuben, Junius, & Rose, LLP
from	Cheri Velzy, Senior Managing Air Quality Associate, ESA
subject	Air Quality Technical Memorandum – 2675 Geary Boulevard Project

Introduction

This memorandum details the methodology and results of an air quality analysis and screening-level health risk assessment (HRA) conducted to evaluate potential health risk impacts from the proposed project at 2675 Geary Boulevard in San Francisco, California. The proposed project is located within the Air Pollutant Exposure Zone (APEZ), as evaluated by the most recent San Francisco Citywide Health Risk Assessment prepared by the San Francisco Department of Public Health and the San Francisco Planning Department's Environmental Planning (EP) Division.[1]

The project sponsor proposes a new Whole Foods grocery store at a building formerly occupied by a Best Buy store, at 2675 Geary Boulevard, San Francisco, California. The proposed project received a Class 32 Categorical Exemption from EP due to its status as infill development. A comment letter was sent to the San Francisco Planning Commission by the United Food & Commercial Workers Union expressing concern that the proposed project would cause air quality impacts that would exceed acceptable thresholds. This air quality technical memorandum (AQTM) analyzes the increase in criteria pollutant emissions, toxic air contaminants (TAC), and health risks associated with the new Whole Foods to provide a quantitative and analytical response to the Union letter.

Criteria pollutants are those pollutants for which ambient standards have been established to protect human health. The criteria pollutants of concern for this analysis include oxides of nitrogen (NO_x), reactive organic gases (ROG), particulate matter 10 microns or less in diameter (PM_{10}), and particulate matter 2.5 microns or less in diameter ($PM_{2.5}$). NO_x and ROG are ozone (smog) precursors. The Bay Area does not attain the ambient ozone standard, nor does it attain the standards for PM_{10} or $PM_{2.5}$ (soot).

1 San Francisco Department of Public Health, San Francisco Planning Department, and Ramboll, *Draft San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, February 2020, *https://www.sfdph.org/dph/files/EHSdocs/AirQuality/Air_Pollutant_Exposure_Zone_Technical_Documentation_2020.pdf*, accessed February 2020.

TACs are pollutants that are harmful to human health at any level. PM_{10} from diesel exhaust ("diesel particulate matter" or DPM) is carcinogenic and considered a TAC, and $PM_{2.5}$ by way of the inhalation pathway, is associated with a wide range of negative health effects.[2]

While this analysis is not currently required for California Environmental Quality Act (CEQA) purposes, emissions and risk results were compared to CEQA significance thresholds from the Bay Area Air Quality Management District (BAAQMD) 2017 CEQA Guidelines to provide a regulatory context.[3]

Project Description

Whole Foods proposes to occupy a space at 2675 Geary Boulevard in San Francisco formerly occupied by Best Buy. As part of its operations, Whole Foods will receive deliveries by diesel trucks, some of which will include transportation refrigeration units (TRUs), which are also diesel-powered. The proposed project will not require substantial construction involving earthmoving or heavy, diesel-powered construction equipment. The majority of modifications to the property will take place inside the building and would generate minimal air emissions.

Delivery truck count data were obtained for a representative Best Buy location at 1717 Harrison and a representative Whole Foods location at 1765 California Street, both in San Francisco. These data were used for baselining and comparative purposes in the air quality analysis described below, and the traffic count reports are attached to this memorandum as **Appendix A**.

Sensitive Receptors

Sensitive receptors are locations where individuals most susceptible to the effects of air pollutants (children, the elderly, and individuals with illnesses) reside or are present for long periods of time. Residences are considered sensitive receptors because these individuals could be present at a residence. In addition, childcare centers, schools, senior housing, and hospitals are also considered sensitive receptors.

Sensitive receptors are present in the proximity of the proposed project. A childcare facility is located on the roof level of the shopping center where the Whole Foods would be located. In addition, residences are located to the north across Geary Boulevard, approximately 245 feet from the truck loading dock, and to the south across O'Farrell Street, approximately 300 feet from the truck loading dock. A senior housing facility is located on the northeast corner of Geary Boulevard and Wood Street, approximately 930 feet from the truck loading dock.

Air Quality Technical Analysis

The methodology and results of the emissions estimation and screening-level HRA are presented in the following sections. Emissions and screening modeling files, project data files, and health risk calculations are provided in **Appendix B**.

Criteria Pollutant Emissions

The operational criteria pollutant emissions were estimated for both the proposed Whole Foods and the former Best Buy operations. Since Best Buy had operated at this location, its emissions were used to establish the

[2] Bay Area Air Quality Management District California Environmental Quality Act Air Quality Guidelines, May 2017, *https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en,* accessed October 2020.

[3] Bay Area Air Quality Management District California Environmental Quality Act Air Quality Guidelines, May 2017, *https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en,* accessed October 2020.

baseline. The difference between the Whole Foods emissions and the Best Buy emissions represent the incremental change from the proposed project (Whole Foods). The analysis estimated criteria pollutant emissions associated with heavy-duty truck transport and idling, transport refrigeration unit (TRU) operations, passenger vehicle trips (customers), building energy consumption and area sources for both the former Best Buy and the proposed project. TRUs include on-board diesel generators to power the refrigeration equipment.

Emissions were calculated using the California Emissions Estimator Model (CalEEMod), the on-road mobile source emission factor model EMFAC2017, and the off-road emissions model OFFROAD-ORION. These models are regulatory-approved for CEQA projects and have been developed by, or in coordination with, the California Air Resources Board (CARB). CalEEMod was used to estimate emissions from building energy consumption and area sources (landscaping, solvents, and product use) and customer vehicles visiting the stores, based on building square footage. EMFAC2017 and OFFROAD-ORION were used to estimate emissions from diesel truck idling and TRUs. Emissions were estimated for NO_x, ROG, PM_{10}, and $PM_{2.5}$.

It should be noted that CalEEMod has EMFAC2014 imbedded within the model to estimate on-road passenger vehicle emissions. This is an older version of EMFAC than the most recent version, EMFAC2017. However, since this analysis is based on the difference between Whole Foods and Best Buy, it is assumed that this difference would be the same whether EMFAC2014 or EMFAC2017 was used to calculate passenger vehicle emissions. Passenger vehicle emissions were not modeled in the HRA, as their contribution from primarily gasoline emissions to cancer risk is negligible in contrast to diesel exhaust from heavy-duty delivery vehicles.

All trucks were conservatively assumed to be diesel-fueled. Idling time was assumed to be 10 minutes per trip, consistent with CARB's Airborne Toxic Control Measure to limit diesel-fueled commercial motor vehicle idling.[4] TRU emissions were based on a dwell time of 60 minutes for 65-foot tractor-trailers and 30 minutes for all other trucks, based on the traffic study (attached). It was assumed no TRUs were required for the Best Buy deliveries, while all Whole Foods deliveries would have TRUs, again resulting in a conservative analysis.

Emissions of these pollutants of concern were calculated for Whole Foods and Best Buy, and then the difference was taken to evaluate the net increase or decrease associated with the proposed Whole Foods. For informational purposes, the results of this analysis were compared to BAAQMD CEQA emissions significance thresholds for criteria pollutants. **Table 1** summarizes these results. The modeled PM_{10} and $PM_{2.5}$ emissions in Table 1 were used in the screening-level HRA discussed below. Table 1 shows a net increase in emissions from the proposed Whole Foods over the baseline Best Buy emissions. This overall increase in emissions is due to increased passenger vehicle trips associated with a grocery store and also the TRUs on the delivery trucks. The net increase in criteria pollutant emissions from the proposed Whole Foods does not exceed BAAQMD CEQA significance thresholds.

4 Title 13, California Code of Regulations, chapter 2485, July 2004.

TABLE 1
OPERATIONAL EMISSIONS COMPARISON FOR BEST BUY AND PROPOSED WHOLE FOODS

	Year 2021 Annual Emissions (pound per day)				Year 2021 Annual Emissions (tons per year)			
	ROG	**NO_X**	**PM_{10}**	**$PM_{2.5}$**	**ROG**	**NO_X**	**PM_{10}**	**$PM_{2.5}$**
Whole Foods	10.1	38.1	16.7	4.7	1.8	7.0	3.0	0.9
Best Buy	4.5	13.0	5.4	1.5	0.8	2.4	1.0	0.3
Incremental Increase	**5.6**	**25.1**	**11.3**	**3.2**	**1.0**	**4.6**	**2.1**	**0.6**
BAAQMD Thresholds	54	54	82	54	10	10	15	10
Over Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**	**No**	**No**

ABBREVIATIONS:

ROG = reactive organic gases; NO_X = oxides of nitrogen; PM_{10} = particulate matter with diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with diameter equal to or less than 2.5 microns.

Screening-Level HRA

A screening-level HRA was conducted for the incremental increase in operational TACs and its impact on the nearest sensitive receptor from the proposed Whole Foods. Table 1 lists the incremental increase in PM_{10} (conservatively assumed to be all DPM for this analysis) and $PM_{2.5}$. As discussed above, DPM is carcinogenic and is considered a TAC. $PM_{2.5}$ is not a TAC based on U.S. Environmental Protection Agency (USEPA) or CARB designations, but is treated as such by BAAQMD due to its adverse health effects, and BAAQMD requires analysis of ground-level concentrations of $PM_{2.5}$ from projects. The HRA evaluated the increase in cancer risk and annual average $PM_{2.5}$ concentrations at the maximally exposed individual resident (MEIR) location, and at the child care center on the roof level of the building that Whole Foods would occupy. The MEIR location is a resident at the apartments approximately 245 feet north of the proposed Whole Foods, across Geary Boulevard.

The HRA analyzed TAC emissions from heavy-duty truck transport and idling along with TRU operations. Regarding project-generated light-duty vehicle exhaust from customers, as discussed above, most auto traffic is gasoline-powered and generates considerably less health risk than diesel engines, and therefore light-duty vehicle exhaust was not included in the HRA. The HRA was prepared using the incremental increase of DPM and $PM_{2.5}$ emissions from the proposed Whole Foods over Best Buy's baseline. The increase of DPM and $PM_{2.5}$ emissions would be due mostly to the operations of the TRUs.

The USEPA AERSCREEN model (version 16216) was be used to estimate DPM and $PM_{2.5}$ concentrations. AERSCREEN is the screening-level version of the USEPA AERMOD dispersion model (version 19191). AERSCREEN uses worst-case wind angles to predict the highest pollutant concentration at a receptor, regardless of the source-receptor direction.

The analysis methods for the screening-level HRA are consistent with the 2020 Citywide Health Risk Assessment.[5] The HRA also followed the protocols outlined by the BAAQMD, CARB, and Office of Environmental Health Hazard Assessment (OEHHA). To estimate the worst-case increase in cancer risk at the MEIR, it was assumed that the exposure period for the analysis would begin with a third trimester fetus that could theoretically be present at the closest residence and continue through 30 years. The cancer risk calculations account

5 San Francisco Department of Public Health, San Francisco Planning Department, and Ramboll, *Draft San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, February 2020, *https://www.sfdph.org/dph/files/EHSdocs/AirQuality/Air_Pollutant_Exposure_Zone_Technical_Documentation_2020.pdf*, accessed February 2020.

for the increased susceptibility to cancer risk of children from birth to 16 years of age, so this exposure assumption is conservative. To estimate the worst-case increase in cancer risk at the child care center, the occupants were assumed to be in the child age group below 16 years of age. While it is unlikely there would be children in the higher end of this age range at the child care center, this calculation uses factors that represent all ages in the 2- to 16-year age cohort.

A conservative representation of the truck idling and delivery area was modeled as a rectangular area source, with TRUs modeled as a volume source. The modeling parameters are as follows:

- Truck idling: rectangular area source dimensions of 16.8 meters by 8.4 meters;
- Truck idling: release height of 2.55 meters and initial vertical dimension of 2.37 meters;
- TRUs: volume source initial lateral dimension of 1.9 meters and initial vertical dimension of 1.4 meters;
- TRUs: release height of 5.0 meters;
- Receptor flagpole height of 1.8 meters (residential receptor) and 10.9 meters (child care center).

The truck idling and TRU sources were modeled with an emission rate of one gram per second to obtain a dispersion factor (unit concentration) at each receptor location. As discussed previously, emissions of exhaust PM_{10} were assumed to be DPM. The DPM and $PM_{2.5}$ concentrations were calculated using the dispersion factors and the DPM and $PM_{2.5}$ emissions from Table 1. The increase in cancer risk was calculated using the resulting DPM concentrations along with equations and factors from the OEHHA 2015 Risk Assessment Guidelines and the BAAQMD HRA Guidelines.[6,7]

Modeling assumptions, equations, and the cancer risk calculations are included in Appendix B.

Results

Table 2 presents the increased cancer risk probability and annual average $PM_{2.5}$ concentrations at the MEIR and child care locations. The maximum cancer risk at the MEIR (apartment building to the north across Geary Boulevard) is 2.68 in one million, and the maximum cancer risk at the child care center is 2.38 in one million.

For informational purposes, the results of the analysis are compared to health risk thresholds for projects in the APEZ,[8] which are as follows:

- Lifetime excess cancer risk increase of 7 per million, and
- Annual average $PM_{2.5}$ concentration of 0.2 micrograms per cubic meter (μ/m^3).

Also as presented in Table 2, the proposed project would contribute $PM_{2.5}$ concentrations of 0.003 $\mu g/m^3$ for the MEIR and 0.007 $\mu g/m^3$ at the child care center. The results indicate both cancer risk and $PM_{2.5}$ concentrations would be well below APEZ thresholds for pollutant levels and health risk from net new emissions.

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6 Office of Environmental Health Hazard Assessment. 2015. *Air Toxics Hot Spots Program – Risk Assessment Guidelines*, February 2015, *http://oehha.ca.gov/air/hot_spots/hotspots2015.html*, accessed July 2020.

7 Bay Area Air Quality Management District, *Air Toxics NSR Program Health Risk Assessment (HRA) Guidelines*, January 2016, *http://www.baaqmd.gov/~/media/files/planning-and-research/rules-and-regs/workshops/2016/reg-2-5/hra-guidelines_clean_jan_2016-pdf.pdf?la=en*, accessed June 2020.

8 San Francisco Department of Public Health, San Francisco Planning Department, and Ramboll, *Draft San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, February 2020, *https://www.sfdph.org/dph/files/EHSdocs/AirQuality/Air_Pollutant_Exposure_Zone_Technical_Documentation_2020.pdf*, accessed February 2020.

TABLE 2
MODELED MAXIMUM INCREASE IN CANCER RISK AND ANNUAL AVERAGE $PM_{2.5}$ CONCENTRATIONS AT THE MEIR AND CHILD CARE CENTER

Receptor	Receptor Group Age	Cancer Risk (in 1 million)	$PM_{2.5}$ Concentration ($\mu g/m^3$)
MEIR (Residence on Geary Blvd)	Third trimester to 30 years	2.68	0.003
Child Care Center	Age 0 to 16 years	2.38	0.007
APEZ Thresholds	All groups	7	0.2

ABBREVIATIONS:

$PM_{2.5}$ = particulate matter with diameter equal to or less than 2.5 microns; $\mu g/m^3$ = micrograms per cubic meter.

SOURCE: ESA, 2020. See Appendix A, *Emissions and Health Risk Calculations*.

Appendix A
Traffic Studies

ESA

SAN FRANCISCO
PLANNING DEPARTMENT

MEMO

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DATE: May 4, 2020

TO: 2675 Geary Boulevard, Record No. 2019-004110ENV

FROM: Rachel Schuett, Transportation Planner

RE: Transportation Coordination Memo

The following describes the proposed project at 2675 Geary Boulevard and the transportation planner coordination and review conducted as part of the environmental review of the project.

Project Description

The project sponsor (Whole Foods Market) proposes a new grocery store, restaurant, and coffee bar at the "City Center" an existing shopping center located at the southeast corner of Masonic Avenue and Geary Boulevard, in the Western Addition Neighborhood of San Francisco. Whole Foods Market would occupy a vacant retail space, formerly occupied by Best Buy (until 2017), above the existing Target store. The proposed project would include a 49,780-square-foot grocery store, a 3,320-square-foot restaurant, and a 1,190-square-foot coffee shop.

The existing Lot C (117 parking spaces) would be available for Whole Foods customers.[1] Loading and deliveries would occur from an existing 3,528-square-foot loading dock which is accessed from O'Farrell Street, just east of Anza Vista Avenue. No changes to vehicle parking, bicycle parking, loading, driveway access, or onsite circulation are proposed. In addition, no changes are proposed in the public right-of way. The project would not require excavation or exterior construction.

The following analysis is based on plans dated May 15, 2019, submitted by the project sponsor on July 23, 2019 (see Attachment 1).

Baseline Conditions

The City Center shopping center has frontages along Geary Boulevard, Masonic Avenue, Lyon Street, and O'Farrell Street. Geary Boulevard is on the High Injury Network. The segments of Geary Boulevard, Masonic Avenue and Lyon Street that are adjacent to the project site are identified as Key Walking Streets in the Planning Department's WalkFirst program.

[1] The entire City Center project site consists of 634 parking spaces (in lots A through F), six off-street freight loading spaces, and approximately 98 bicycle parking spaces.

There are four bicycle routes on the San Francisco Bikeway Network within 250 feet of the project site: Geary Boulevard (Class III), Masonic Avenue (Class II and IV), Presidio Boulevard (Class III), and Lyon Street.

The General Plan classifies Geary Boulevard as a Transit Important Street. The following Muni lines have stops within one-quarter mile of the project site: 1AX California A Express, 2 Clement, 31 Balboa, 31AX Balboa A Express, 31BX Balboa B Express, 38 Geary, 38AX Geary A Express, 38BX Geary B Express, 38R Geary Rapid, 43 Masonic, NX N Express. The nearest Muni stops are at Geary Boulevard and Masonic Avenue (serving the 38 Geary, 38R Geary Rapid, and 43 Masonic routes), and Geary Boulevard and Presidio Avenue (serving the 38 Geary and 38R Geary Rapid routes).

The City Center shopping center is surrounded by a large paved apron, which includes 634 vehicle parking spaces (in lots A through F), six off-street freight loading spaces, and approximately 98 bicycle parking spaces. A continuous sidewalk runs around the perimeter of the shopping center property, within the public right-of-way.

Project Travel Demand

Localized trip generation of the proposed project was calculated using a trip-based analysis and information in the *2019 Transportation Impact Analysis Guidelines for Environmental Review* (SF Guidelines) developed by the San Francisco Planning Department (see Attachment 2).[2] The proposed project would generate an estimated 17,491 person-trips (inbound and outbound) on a weekday daily basis, consisting of 3,203 trips by vehicle, 163 trips by taxi or transportation network company, 2,064 transit trips, 88 trips by private shuttle, 490 trips by bicycle and 10,075 trips by walking. During the p.m. peak hour the proposed project would generate an estimated 265 trips by vehicle and 14 trips by taxi or transportation network company, 171 transit trips, seven trips by private shuttle, 40 trips by bicycle and 832 trips by walking.

The project travel demand is conservative in that it does not account for the recent use (Best Buy) of the space proposed to be occupied by Whole Foods Market.

Impact Evaluation

This impact analysis covers transportation impacts related to freight loading. The following topics did not require further review, as explained:

[2] San Francisco Planning Department, Transportation Calculations for 2675 Geary Boulevard, February 20, 2020.

- **Construction.** The proposed project would not require any exterior construction, so construction-related transportation impacts are not discussed further.
- **Potentially Hazardous Conditions.** The proposed project would not create potentially hazardous conditions for people walking, bicycling, or driving, or to public transit operations because no changes to pedestrian or bicycle facilities, transit stops or lanes, or roadways are proposed. In addition, the proposed project would not result in changes to curb cuts, site access, or onsite circulation.
- **Accessibility.** The proposed project would not interfere with accessibility of people walking or bicycling to and from the project site, and adjoining areas, or result in inadequate emergency access. Adequate access to the City Center shopping center is already provided via existing bikeways, sidewalks, streets and curb cuts and no changes to the public-right-of-way, site access, or onsite circulation are proposed.
- **Public Transit Delay.** During the p.m. peak hour the proposed project would generate an estimated 265 trips by vehicle and 14 trips by taxi or transportation network company. Given that the number of new vehicle trips is below the Planning Department's screening criterion of 300 trips, and given that the project's driveway is located on a section of O'Farrell Street (just east of Anza Vista Avenue and approximately 500 feet from the Masonic Avenue intersection), which is not along a Muni route, or adjacent to a Muni stop location, the proposed project would not result in substantial delays to public transit.
- **Passenger Loading.** The proposed project would not result in a passenger loading deficit since there is adequate space within the existing parking lot (Lot C) for passenger loading operations to occur. Given that passenger loading would most likely occur within the parking lot, rather than within the public right-of-way, passenger loading operations would not result in secondary effects, such as creating potentially hazardous conditions for people walking, bicycling, or driving; or resulting in substantial delays to public transit.
- **Vehicle Miles Traveled.** The proposed project is infill development within an existing shopping center and does not include any changes to the public right-of-way. Therefore, the project would not cause substantial additional VMT or substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow travel lanes) or by adding new roadways to the network. Refer to Attachment 3 for the Senate Bill 743

checklist, which screens out Vehicle Miles Traveled (VMT) and secondary effects from vehicular parking.

Freight Loading

Existing plus Project Conditions

Loading Supply. Loading and deliveries would occur from an existing 3,528-square-foot loading dock, within Lot E which is accessed from O'Farrell Street; specifically, from the second driveway east of Anza Vista Avenue. Trucks would use this driveway for both ingress and egress (see Attachment 5). There are four stalls within the loading dock, each of which can accommodate a 65-foot tractor trailer. Target currently uses two stalls, the other two would be dedicated to Whole Foods Market.

Loading Demand. The project sponsor provided loading demand information from the busiest Whole Foods Market in San Francisco, located at 1765 California Street (at Franklin Street), as summarized in Table 1. Whole Foods Deliveries – 1765 California Street, San Francisco, CA.

Table 1. Whole Foods Deliveries – 1765 California Street, San Francisco, CA.[1]

Day of Week	Truck Length			Total
	65 foot	30-48 foot	Other[2]	
Monday	4	4	20	**28**
Tuesday	2	4	12	**18**
Wednesday	4	4	20	**28**
Thursday	3	4	12	**19**
Friday	4	4	20	**28**
Saturday	4	4	12	**18**
Sunday	2	2	5	**7**
Weekly Total	23	22	101	**146**
Daily Average[3]	4	4	15	**23**
Daily Maximum	4	4	20	**28**

[1] Source: Whole Foods Market – see Attachment 6.

[2] Includes bobtail trucks and large or small vans.

[3] All values rounded up to the nearest whole number.

The Whole Foods Market at 1765 California includes approximately 15,000 square feet of retail sales floor space, and the proposed project would include 49,780 square feet. Full-service Whole Foods Market stores handle 20,000 – 30,000 Stock Keeping Units (SKUs). SKUs are unique codes assigned to specific items in a retailer's inventory.[3] As such, the number of SKUs directly affects the number of vendors and deliveries needed for the store.[4]

Although the proposed Whole Foods at 2675 Geary Boulevard is larger than the 1765 California Street store, Whole Foods expects the Geary Boulevard to do a lower volume of business than at California Street, resulting in fewer deliveries. Whole Foods estimates lower traffic at this location for two reasons. First, the Franklin Street store has been in operations for years now and therefore has a customer base that is used to going to that store. Second, and more importantly, population density. Per Whole Foods' metrics, the population density near Franklin is nearly twice that of the immediate vicinity near 2675 Geary, with more than twice the daytime population.

However, to be conservative, the delivery demand numbers included in Table 1 were used to estimate the daily average and daily maximum deliveries to the proposed Geary Boulevard store, as summarized in Table 2. Whole Foods Deliveries – 2675 Geary Boulevard, San Francisco, CA, below.

Table 2. Whole Foods Deliveries – 2675 Geary Boulevard, San Francisco, CA.[1]

Day of Week	Truck Length			Total
	65 foot	30-48 foot	Other[2]	
Daily Average[3]	4	4	15	**23**
Daily Maximum	4	4	20	**28**

[1] Source: San Francisco Planning Department and Whole Foods Market – see Attachment 6.

[2] Includes bobtail trucks and large or small vans.

[3] All values rounded up to the nearest whole number.

[3] A Stock Keeping Unit (or SKU) is a scannable bar code that uniquely identifies a product that is stocked for retail sale. SKUs allow vendors to automatically track the movement of inventory and may facilitate automatic re-ordering of items once purchased.

[4] Kittleson & Associates. 1600 Jackson Street Loading Analysis Memo. April, 19, 2018.

As shown in Table 2, the average daily deliveries would include 23 truck trips, with a maximum of up to 28 truck trips.

Dwell time. Whole Foods Market stores typically receive 70 to 75 percent of their product mix from three carriers in 65-foot trucks: UNFI, the DC, and Tony's. UNFI and the DC delivery trucks typically require an hour to empty a full load, and Tony's requires 30 minutes to unload a half load. Whole Foods conservatively estimates that the average dwell time for a 65-foot truck is one hour and that the average dwell time for all other vehicles is 30 minutes.[5]

Based on the truck trips included in Table 2 and the average dwell times from other Whole Foods locations, deliveries to the proposed 2675 Geary Boulevard store would result in the following dwell times on an average day:

- 65-foot trucks: four deliveries x 60 minutes/per delivery = 240 minutes = four hours dwell time
- All other vehicles: 19 deliveries x 30 minutes/per delivery = 570 minutes = 9.5 hours dwell time
- Total dwell time on an average day = 13.5 hours/2 loading bays = 6.75 hours

Dwell times on a maximum delivery day would be:

- 65-foot trucks: four deliveries x 60 minutes/per delivery = 240 minutes = four hours dwell time
- All other vehicles: 24 deliveries x 30 minutes/per delivery = 720 minutes = 12 hours dwell time
- Total dwell time on a maximum day = 16 hours/2 loading bays = 8 hours

Loading operations could happen anytime during a 24-hour period since the City Center shopping center does not have time restrictions on deliveries, and no deliveries would be handled from the public right-of-way.

As such, the loading supply would be adequate to accommodate loading demands and impacts to freight loading would be *less than significant*.

Cumulative Conditions

Future development is expected in the vicinity of the project site, including nearby land use development projects and the transportation improvements such

[5] Kittleson & Associates. 1600 Jackson Street Loading Analysis Memo. April, 19, 2018.

as the Geary Bus Rapid Transit (BRT) service. However, only one future proposed project could combine with the proposed Whole Foods store to result in potential cumulative freight loading impacts; the opening of a new PetSmart Store in an existing building (currently vacant) in Lot F of the City Center shopping center, which is anticipated in late spring 2020The PetSmart Store would have parking within Lot F, but could also be accessed from Lot E, from the same driveway as the proposed project's loading dock. However, given that the PetSmart store would have separate parking and loading facilities in a separate lot, and given that Lot E is adequate to handle the truck turning movements for existing and proposed, as well as future deliveries, cumulative impacts related to freight loading would be *less than significant*.

Attachments

Attachment 1: Plans dated May 15, 2019
Attachment 2: Project Travel Demand Estimate Calculations (Trip Generation Table)
Attachment 3: Senate Bill 743 Checklist
Attachment 4: Transportation Study Determination form
Attachment 5: Lot E Loading Dock Exhibit
Attachment 6: Whole Foods Market at 2675 Geary Boulevard - Loading Information Request, August 13, 2019

KITTELSON & ASSOCIATES
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P 415.579.1778

MEMORANDUM

Date: August 12, 2019 Project #: 24322

To: Brian Bacharach, Acadia Realty
Mark Loper, Reuben, Junius & Rose, LLP

From: Kittelson & Associates, Inc.

Project: Best Buy Freight Loading Survey Summary

INTRODUCTION

This memorandum summarizes data collected at the Best Buy location at 1717 Harrison Street in San Francisco on Wednesday, July 31 between 5 a.m. and 10 p.m.

DATA SUMMARY

Freight loading activity was observed at Best Buy at 1717 Harrison Street, San Francisco. Video data was collected on Wednesday, July 31, between 5 a.m. and 10 p.m at the freight loading dock, curb in front of the store, and both active driveways. Video data was reduced and the vehicle type, location, time of day (in/out), and duration of loading activity was reported. The number of Geek Squad Vehicles entering/exiting the site was also recorded. A loading activity summary is presented in Table 1 and the raw data and additional summary tables are attached.

As shown in Table 1, a total of 44 loading events were recorded during the 27-hour period between 5 a.m. and 10 p.m. These loading events include 7 commercial freight vehicles within the loading dock, 10 commercial freight vehicles conducting curbside loading, and 27 customers in private vehicles conducing curbside loading of purchased goods. The overall average duration of loading activity was approximately 28 minutes and the peak hour(s) of activity occurred between 3 and 4 p.m. and 7 and 8 p.m. with a total of five vehicles loading during each hour, and a maximum two vehicles stopped at one time. A total of 10 Geek Squad Vehicles entered the site. Three Geek Squad Vehicles stopped curbside in front of the store and seven vehicles parked in the surface lot.

Table 1: Loading Activity Summary – Best Buy, 1717 Harrison Street, 5am – 10pm

Description	Best Buy Loading Activity (Freight Loading Dock and Curbside in Front of Store)				Geek Squad Vehicle Count[1]
	Commercial Freight - Loading Dock	Commercial Freight - Curbside	Customer Pickup - Curbside	Overall	
Total Number of Vehicles	**7**	**10**	**27**	**44**	**10**
Average Loading Duration	0:27:57	1:29:13	0:04:51	**0:27:42**	
Vehicle Classification Breakdown					
Semi-Truck (FHWA Class 9)	2	0	0	**2**	
Two-Axle Six Tire (FHWA Class 5)	4	2	0	**6**	
Four-Tire Single-Unit (FHWA Class 3)	1	5	11	**17**	
Geek Squad Van (FHWA Class 3)	0	3	0	**3**	
Passenger Car (FHWA Class 2)	0	0	16	**16**	
Peak Hour of Activity	Loading activity distributed throughout the day. Each hour of activity had 1 vehicle loading, with no overlap	8-9am 4 vehicles during the hour, max of 2 vehicles stopped at same time	7-8pm 5 vehicles during the hour, max of 2 vehicles stopped at same time	**3-4pm and 7-8 5 vehicles during the hour, max of 2 vehicles stopped at same time**	

Source: Quality Counts, Wednesday July 31, 2019, 5am to 10pm.
Notes:
[1] Count of Geek Squad Vehicles from driveway counts collected between 5am and 10pm at Best Buy driveways. Count includes Geek Squad Vehicles parked within the lot and those that stopped curbside. Count of Freight – Curbside also includes Geek Squad Vehicles (3 total).

Freight Loading Study

Best Buy - 1717 Harrison Street, SF

OVERALL SUMMARY

	Freight - Loading Dock	Freight - Curbside	Customer - Curbside	Overall	Geek Squad (Total, inc. Curbside)
Total between 5am and 10pm	**7**	**10**	**27**	**44**	**10**
Average Duration	0:27:57	1:29:13	0:04:51	0:27:42	
Vehicle Classification Breakdown					
Semi-Truck (FHWA Class 9)	2	0	0	2	
Two-Axle Six Tire (FHWA Class 5)	4	2	0	6	
Four Tire Single-Unit(FHWA Class 3)	1	5	11	17	
Geek Squad Van	0	3	0	3	
Passenger Car (FHWA Class 2)	0	0	16	16	
Peak Hour of Activity	Each hour of activity had 1 vehicle loading, no overlap	8-9am (4 vehicles during the hour, 2 vehicles stopped at same time)	7-8pm (5 vehicles during the hour, 2 vehicles stopped at 1 time)	3-4pm and 7-8 (5 vehicles during the hour, 2 vehicles stopped at 1 time)	

Freight Loading Study
Best Buy - 1717 Harrison Street, SF

Quality Counts
DATA THAT DRIVES COMMUNITIES

Site Code: 15038101
Location: Best Buy at 1717 Harrison St
Time: 5:00 am - 10:00 pm
Date: 7/31/2019

Zone 1: Front curbside
Zone 2 (Blue): Loading Dock

Zone	FHWA Class	Vehicle Type	Time In	Time Out	Duration of Stay	Notes
1	3	"Best Buy Magnolia" Delivery Van	< 5:00:00 AM	9:46:26 AM	4:46:26	
2	9	"Keystone Freight Corp" Tractor-Trailer	7:50:10 AM	9:50:13 AM	2:00:03	Uses loading bay
1	3	Unmarked Small Delivery Van	8:32:41 AM	8:42:26 AM	0:09:45	
1	3	"Best Buy Magnolia" Delivery Van	8:46:52 AM	12:37:57 PM	3:51:05	
1	3	"Geek Squad" Van	8:50:49 AM	9:23:00 AM	0:32:11	
2	5	"UPS" Delivery Truck	10:10:21 AM	10:20:52 AM	0:10:31	Uses loading bay
1	2	Sedan	10:18:10 AM	10:18:49 AM	0:00:39	Customer purchase loading
1	2	Sedan	10:44:20 AM	10:44:54 AM	0:00:34	Customer purchase loading
1	2	Sedan	10:49:42 AM	10:50:44 AM	0:01:02	Customer purchase loading
1	3	"Geek Squad" Delivery Van	11:01:48 AM	11:42:50 AM	0:41:02	
1	5	"Run Run Moving Co" Box Truck	11:49:49 AM	11:57:20 AM	0:07:31	
1	2	Sedan	11:55:39 AM	11:57:06 AM	0:01:27	Customer purchase loading; Parks in street in Westbound travel lane
2	5	"FedEx" Delivery Truck	12:50:26 PM	12:53:12 PM	0:02:46	Uses loading bay
1	5	"GardaWorld" Security Truck	12:51:27 PM	12:55:04 PM	0:03:37	Parcel/bag unloading, then reloading
1	2	Sedan	1:00:47 PM	1:01:12 PM	0:00:25	Customer purchase loading
1	2	Sedan	1:07:52 PM	1:09:03 PM	0:01:11	Customer purchase loading
2	9	Tractor-Trailer, logo too small to read	1:56:21 PM	2:24:11 PM	0:27:50	Uses loading bay
1	3	Small SUV	2:14:00 PM	2:15:24 PM	0:01:24	Customer purchase loading
1	2	Sedan	2:16:42 PM	2:18:24 PM	0:01:42	Customer purchase loading
2	5	Unmarked Box Truck	2:25:28 PM	2:46:43 PM	0:21:15	Uses loading bay
1	2	Taxi	2:44:11 PM	2:44:39 PM	0:00:28	Customer purchase loading
1	3	SUV	2:53:54 PM	3:00:57 PM	0:07:03	Customer purchase loading
1	3	"Geek Squad" Van	3:11:00 PM	3:17:48 PM	0:06:48	
1	3	Small SUV	3:13:44 PM	3:14:51 PM	0:01:07	Customer purchase loading
1	2	Hatchback	3:40:29 PM	3:42:08 PM	0:01:39	Customer purchase loading
1	2	Sedan	3:41:56 PM	3:43:08 PM	0:01:12	Customer purchase loading
1	3	SUV	3:53:25 PM	3:56:07 PM	0:02:42	Customer purchase loading
2	5	"UPS" Delivery Truck	4:18:41 PM	4:28:09 PM	0:09:28	Uses loading bay
1	3	SUV	4:40:00 PM	4:46:58 PM	0:06:58	Customer purchase loading
1	3	Unmarked Van	4:40:37 PM	4:42:17 PM	0:01:40	
2	3	Unmarked Van	4:42:31 PM	4:46:15 PM	0:03:44	Does not enter loading bay; Loading activity obscured
1	3	"Best Buy Magnolia" Delivery Van	5:27:58 PM	> 10:00:00 PM	4:32:02	Appear to be gathering personal belongings
1	2	Sedan	5:36:26 PM	5:37:30 PM	0:01:04	Customer purchase loading
1	2	Compact Car	5:49:57 PM	5:51:17 PM	0:01:20	Customer purchase loading
1	2	Hatchback	6:01:26 PM	6:43:12 PM	0:41:46	Customer purchase loading
1	2	Hatchback	6:33:00 PM	6:33:59 PM	0:00:59	Customer purchase loading
1	2	Hatchback	7:04:05 PM	7:05:12 PM	0:01:07	Unloads large box, possibly a return item
1	3	SUV	7:32:09 PM	7:43:17 PM	0:11:08	Unloads large box, possibly a return item
1	3	SUV	7:38:43 PM	7:44:06 PM	0:05:23	Customer purchase loading
1	2	Hatchback	7:44:53 PM	7:45:32 PM	0:00:39	Customer purchase loading
1	3	SUV	7:47:58 PM	8:16:50 PM	0:28:52	Customer purchase loading
1	3	SUV	8:49:06 PM	8:55:03 PM	0:05:57	Customer purchase loading
1	3	Van	8:51:54 PM	8:53:00 PM	0:01:06	Customer purchase loading
1	3	SUV	8:52:56 PM	8:55:06 PM	0:02:10	Customer purchase loading

Freight Loading Study

Best Buy - 1717 Harrison Street, SF

Location: Best Buy at 1717 Harrison St
Time: 5:00 am - 10:00 pm
Date: 7/31/2019

FREIGHT LOADING - LOADING DOCK

FHWA Class	Vehicle Type	Time In	Time Out	Duration of Stay
9	"Keystone Freight Corp" Tractor-Trailer	7:50:10 AM	9:50:13 AM	2:00:03
5	"UPS" Delivery Truck	10:10:21 AM	10:20:52 AM	0:10:31
5	"FedEx" Delivery Truck	12:50:26 PM	12:53:12 PM	0:02:46
9	Tractor-Trailer, logo too small to read	1:56:21 PM	2:24:11 PM	0:27:50
5	Unmarked Box Truck	2:25:28 PM	2:46:43 PM	0:21:15
5	"UPS" Delivery Truck	4:18:41 PM	4:28:09 PM	0:09:28
3	Unmarked Van	4:42:31 PM	4:46:15 PM	0:03:44

FREIGHT LOADING - CURBSIDE IN FRONT OF STORE

FHWA Class	Vehicle Type	Time In	Time Out	Duration of Stay
3	"Best Buy Magnolia" Delivery Van	##########	9:46:26 AM	4:46:26
3	Unmarked Small Delivery Van	8:32:41 AM	8:42:26 AM	0:09:45
3	"Best Buy Magnolia" Delivery Van	8:46:52 AM	12:37:57 PM	3:51:05
3	"Geek Squad" Van	8:50:49 AM	9:23:00 AM	0:32:11
3	"Geek Squad" Delivery Van	11:01:48 AM	11:42:50 AM	0:41:02
5	"Run Run Moving Co" Box Truck	11:49:49 AM	11:57:20 AM	0:07:31
5	"GardaWorld" Security Truck	12:51:27 PM	12:55:04 PM	0:03:37
3	"Geek Squad" Van	3:11:00 PM	3:17:48 PM	0:06:48
3	Unmarked Van	4:40:37 PM	4:42:17 PM	0:01:40
3	"Best Buy Magnolia" Delivery Van	5:27:58 PM	##########	4:32:02

Freight Loading Study

Best Buy - 1717 Harrison Street, SF

Location: Best Buy at 1717 Harrison St
Time: 5:00 am - 10:00 pm
Date: 7/31/2019

CUSTOMER LOADING - CURBSIDE IN FRONT OF STORE

FHWA Class	Vehicle Type	Time In	Time Out	Duration of Stay
2	Sedan	10:18:10 AM	10:18:49 AM	0:00:39
2	Sedan	10:44:20 AM	10:44:54 AM	0:00:34
2	Sedan	10:49:42 AM	10:50:44 AM	0:01:02
2	Sedan	11:55:39 AM	11:57:06 AM	0:01:27
2	Sedan	1:00:47 PM	1:01:12 PM	0:00:25
2	Sedan	1:07:52 PM	1:09:03 PM	0:01:11
3	Small SUV	2:14:00 PM	2:15:24 PM	0:01:24
2	Sedan	2:16:42 PM	2:18:24 PM	0:01:42
2	Taxi	2:44:11 PM	2:44:39 PM	0:00:28
3	SUV	2:53:54 PM	3:00:57 PM	0:07:03
3	Small SUV	3:13:44 PM	3:14:51 PM	0:01:07
2	Hatchback	3:40:29 PM	3:42:08 PM	0:01:39
2	Sedan	3:41:56 PM	3:43:08 PM	0:01:12
3	SUV	3:53:25 PM	3:56:07 PM	0:02:42
3	SUV	4:40:00 PM	4:46:58 PM	0:06:58
2	Sedan	5:36:26 PM	5:37:30 PM	0:01:04
2	Compact Car	5:49:57 PM	5:51:17 PM	0:01:20
2	Hatchback	6:01:26 PM	6:43:12 PM	0:41:46
2	Hatchback	6:33:00 PM	6:33:59 PM	0:00:59
2	Hatchback	7:04:05 PM	7:05:12 PM	0:01:07
3	SUV	7:32:09 PM	7:43:17 PM	0:11:08
3	SUV	7:38:43 PM	7:44:06 PM	0:05:23
2	Hatchback	7:44:53 PM	7:45:32 PM	0:00:39
3	SUV	7:47:58 PM	8:16:50 PM	0:28:52
3	SUV	8:49:06 PM	8:55:03 PM	0:05:57
3	Van	8:51:54 PM	8:53:00 PM	0:01:06
3	SUV	8:52:56 PM	8:55:06 PM	0:02:10

Freight Loading Study

Best Buy - 1717 Harrison Street, SF

Site Code: 15038104
Location: Best Buy Dwy at 13th St
Time: 5:00 am - 10:00 pm
Date: 7/31/2019

Start Time	In Southbound	Out Northbound
5:00 AM	0	0
5:05 AM	0	0
5:10 AM	0	0
5:15 AM	0	0
5:20 AM	0	0
5:25 AM	0	0
5:30 AM	0	0
5:35 AM	0	0
5:40 AM	0	0
5:45 AM	0	0
5:50 AM	0	0
5:55 AM	0	0
6:00 AM	0	0
6:05 AM	0	0
6:10 AM	0	0
6:15 AM	0	0
6:20 AM	0	0
6:25 AM	0	0
6:30 AM	0	0
6:35 AM	0	0
6:40 AM	0	0
6:45 AM	0	0
6:50 AM	0	0
6:55 AM	0	0
7:00 AM	0	0
7:05 AM	0	0
7:10 AM	0	0
7:15 AM	0	0
7:20 AM	0	0
7:25 AM	0	0
7:30 AM	0	0
7:35 AM	0	0

Freight Loading Study

Best Buy - 1717 Harrison Street, SF

Start Time	In Southbound	Out Northbound
7:40 AM	0	0
7:45 AM	0	0
7:50 AM	0	0
7:55 AM	0	0
8:00 AM	0	0
8:05 AM	0	0
8:10 AM	0	0
8:15 AM	0	0
8:20 AM	0	0
8:25 AM	0	0
8:30 AM	0	0
8:35 AM	0	0
8:40 AM	0	0
8:45 AM	0	0
8:50 AM	0	0
8:55 AM	0	0
9:00 AM	0	0
9:05 AM	0	0
9:10 AM	0	0
9:15 AM	0	0
9:20 AM	0	1
9:25 AM	0	0
9:30 AM	0	0
9:35 AM	0	0
9:40 AM	0	0
9:45 AM	0	0
9:50 AM	0	0
9:55 AM	0	0
10:00 AM	0	0
10:05 AM	0	0
10:10 AM	1	0
10:15 AM	0	0
10:20 AM	0	0
10:25 AM	0	0
10:30 AM	0	0
10:35 AM	0	0
10:40 AM	0	0
10:45 AM	0	0
10:50 AM	0	0
10:55 AM	0	0
11:00 AM	0	0
11:05 AM	0	0
11:10 AM	0	0

Freight Loading Study

Best Buy - 1717 Harrison Street, SF

Start Time	In Southbound	Out Northbound
11:15 AM	0	0
11:20 AM	0	0
11:25 AM	0	0
11:30 AM	0	0
11:35 AM	0	0
11:40 AM	0	1
11:45 AM	0	0
11:50 AM	0	0
11:55 AM	0	0
12:00 PM	0	0
12:05 PM	0	0
12:10 PM	0	0
12:15 PM	0	0
12:20 PM	0	0
12:25 PM	0	0
12:30 PM	0	0
12:35 PM	0	0
12:40 PM	0	0
12:45 PM	0	0
12:50 PM	0	0
12:55 PM	0	0
1:00 PM	0	0
1:05 PM	0	0
1:10 PM	0	2
1:15 PM	0	0
1:20 PM	0	0
1:25 PM	0	0
1:30 PM	0	0
1:35 PM	0	0
1:40 PM	0	0
1:45 PM	0	0
1:50 PM	0	0
1:55 PM	0	0
2:00 PM	0	0
2:05 PM	0	0
2:10 PM	0	0
2:15 PM	0	0
2:20 PM	0	0
2:25 PM	0	0
2:30 PM	0	0
2:35 PM	0	0
2:40 PM	0	0
2:45 PM	0	0

Freight Loading Study

Best Buy - 1717 Harrison Street, SF

Start Time	In Southbound	Out Northbound
2:50 PM	0	0
2:55 PM	0	0
3:00 PM	0	0
3:05 PM	0	0
3:10 PM	0	0
3:15 PM	0	0
3:20 PM	0	0
3:25 PM	0	1
3:30 PM	0	0
3:35 PM	0	0
3:40 PM	0	0
3:45 PM	0	0
3:50 PM	0	0
3:55 PM	0	0
4:00 PM	0	0
4:05 PM	0	0
4:10 PM	0	0
4:15 PM	0	0
4:20 PM	0	0
4:25 PM	0	0
4:30 PM	0	0
4:35 PM	0	0
4:40 PM	0	0
4:45 PM	0	0
4:50 PM	0	0
4:55 PM	0	0
5:00 PM	0	0
5:05 PM	0	0
5:10 PM	0	0
5:15 PM	0	0
5:20 PM	0	0
5:25 PM	0	0
5:30 PM	0	0
5:35 PM	0	0
5:40 PM	0	0
5:45 PM	0	0
5:50 PM	0	0
5:55 PM	0	0
6:00 PM	0	0
6:05 PM	0	0
6:10 PM	0	0
6:15 PM	0	0
6:20 PM	0	0

Freight Loading Study

Best Buy - 1717 Harrison Street, SF

Start Time	In Southbound	Out Northbound
6:25 PM	0	0
6:30 PM	0	0
6:35 PM	0	0
6:40 PM	0	0
6:45 PM	0	0
6:50 PM	0	0
6:55 PM	0	0
7:00 PM	0	0
7:05 PM	0	0
7:10 PM	0	0
7:15 PM	0	0
7:20 PM	0	0
7:25 PM	0	0
7:30 PM	0	0
7:35 PM	0	0
7:40 PM	0	0
7:45 PM	0	0
7:50 PM	0	0
7:55 PM	0	0
8:00 PM	0	0
8:05 PM	0	0
8:10 PM	0	0
8:15 PM	0	0
8:20 PM	0	0
8:25 PM	0	0
8:30 PM	0	0
8:35 PM	0	0
8:40 PM	0	0
8:45 PM	0	0
8:50 PM	0	0
8:55 PM	0	0
9:00 PM	0	0
9:05 PM	0	0
9:10 PM	0	0
9:15 PM	0	0
9:20 PM	0	0
9:25 PM	0	0
9:30 PM	0	0
9:35 PM	0	0
9:40 PM	0	0
9:45 PM	0	0
9:50 PM	0	0
9:55 PM	0	0

Freight Loading Study

Best Buy - 1717 Harrison Street, SF

Start Time	In Southbound	Out Northbound
Total	**1**	**5**

Freight Loading Study

Best Buy - 1717 Harrison Street, SF

Site Code: 15038102
Location: Best Buy Dwy at Harrison
Time: 5:00 am - 10:00 pm
Date: 7/31/2019

Start Time	In Eastbound	Out Westbound
5:00 AM	0	0
5:05 AM	0	0
5:10 AM	0	0
5:15 AM	0	0
5:20 AM	0	0
5:25 AM	0	0
5:30 AM	0	0
5:35 AM	0	0
5:40 AM	0	0
5:45 AM	0	0
5:50 AM	0	0
5:55 AM	0	0
6:00 AM	0	0
6:05 AM	0	0
6:10 AM	0	0
6:15 AM	0	0
6:20 AM	0	0
6:25 AM	0	0
6:30 AM	0	0
6:35 AM	0	0
6:40 AM	0	0
6:45 AM	0	0
6:50 AM	0	0
6:55 AM	0	0
7:00 AM	0	0
7:05 AM	0	0
7:10 AM	0	0
7:15 AM	0	0
7:20 AM	0	0
7:25 AM	0	0
7:30 AM	0	0
7:35 AM	0	0

Freight Loading Study

Best Buy - 1717 Harrison Street, SF

Start Time	In Eastbound	Out Westbound
7:40 AM	0	0
7:45 AM	0	0
7:50 AM	0	0
7:55 AM	0	0
8:00 AM	0	0
8:05 AM	0	0
8:10 AM	0	0
8:15 AM	0	0
8:20 AM	0	0
8:25 AM	0	0
8:30 AM	0	0
8:35 AM	0	0
8:40 AM	0	0
8:45 AM	0	0
8:50 AM	1	0
8:55 AM	0	0
9:00 AM	2	0
9:05 AM	0	0
9:10 AM	0	0
9:15 AM	0	1
9:20 AM	0	1
9:25 AM	0	0
9:30 AM	0	0
9:35 AM	0	0
9:40 AM	0	0
9:45 AM	0	0
9:50 AM	0	0
9:55 AM	0	0
10:00 AM	0	0
10:05 AM	0	0
10:10 AM	0	0
10:15 AM	0	0
10:20 AM	0	0
10:25 AM	0	0
10:30 AM	0	0
10:35 AM	0	0
10:40 AM	0	0
10:45 AM	0	0
10:50 AM	0	0
10:55 AM	0	0
11:00 AM	1	0
11:05 AM	0	0
11:10 AM	0	0

Freight Loading Study

Best Buy - 1717 Harrison Street, SF

Start Time	In Eastbound	Out Westbound
11:15 AM	0	0
11:20 AM	0	0
11:25 AM	0	0
11:30 AM	0	0
11:35 AM	0	0
11:40 AM	0	1
11:45 AM	0	0
11:50 AM	1	0
11:55 AM	0	0
12:00 PM	0	0
12:05 PM	0	0
12:10 PM	0	0
12:15 PM	0	1
12:20 PM	0	0
12:25 PM	0	0
12:30 PM	0	0
12:35 PM	0	0
12:40 PM	0	0
12:45 PM	0	0
12:50 PM	0	0
12:55 PM	0	0
1:00 PM	0	0
1:05 PM	0	0
1:10 PM	1	0
1:15 PM	0	0
1:20 PM	0	0
1:25 PM	0	0
1:30 PM	0	0
1:35 PM	0	0
1:40 PM	0	0
1:45 PM	0	0
1:50 PM	0	0
1:55 PM	0	0
2:00 PM	0	0
2:05 PM	0	1
2:10 PM	0	0
2:15 PM	0	0
2:20 PM	0	0
2:25 PM	0	0
2:30 PM	0	0
2:35 PM	0	0
2:40 PM	0	0
2:45 PM	0	0

Freight Loading Study

Best Buy - 1717 Harrison Street, SF

Start Time	In Eastbound	Out Westbound
2:50 PM	0	0
2:55 PM	0	0
3:00 PM	0	0
3:05 PM	0	0
3:10 PM	1	0
3:15 PM	0	0
3:20 PM	0	0
3:25 PM	0	0
3:30 PM	0	0
3:35 PM	0	0
3:40 PM	0	0
3:45 PM	0	0
3:50 PM	0	0
3:55 PM	0	0
4:00 PM	0	0
4:05 PM	0	0
4:10 PM	0	0
4:15 PM	0	0
4:20 PM	0	0
4:25 PM	0	0
4:30 PM	0	0
4:35 PM	0	0
4:40 PM	0	0
4:45 PM	0	0
4:50 PM	0	0
4:55 PM	0	0
5:00 PM	0	0
5:05 PM	0	0
5:10 PM	0	0
5:15 PM	0	0
5:20 PM	0	0
5:25 PM	0	0
5:30 PM	0	0
5:35 PM	0	0
5:40 PM	0	0
5:45 PM	0	0
5:50 PM	0	0
5:55 PM	0	0
6:00 PM	0	0
6:05 PM	0	0
6:10 PM	0	0
6:15 PM	0	0
6:20 PM	0	0

Freight Loading Study

Best Buy - 1717 Harrison Street, SF

Start Time	In Eastbound	Out Westbound
6:25 PM	0	0
6:30 PM	0	0
6:35 PM	0	0
6:40 PM	0	0
6:45 PM	0	0
6:50 PM	0	0
6:55 PM	0	0
7:00 PM	0	0
7:05 PM	0	0
7:10 PM	0	0
7:15 PM	0	0
7:20 PM	0	0
7:25 PM	0	0
7:30 PM	0	0
7:35 PM	0	0
7:40 PM	0	0
7:45 PM	0	0
7:50 PM	0	0
7:55 PM	0	0
8:00 PM	0	0
8:05 PM	0	0
8:10 PM	0	0
8:15 PM	0	0
8:20 PM	0	0
8:25 PM	0	0
8:30 PM	0	0
8:35 PM	0	0
8:40 PM	0	0
8:45 PM	0	0
8:50 PM	0	0
8:55 PM	0	0
9:00 PM	0	0
9:05 PM	0	0
9:10 PM	0	0
9:15 PM	0	0
9:20 PM	0	0
9:25 PM	0	0
9:30 PM	0	0
9:35 PM	0	0
9:40 PM	0	0
9:45 PM	0	0
9:50 PM	0	0
9:55 PM	0	0

Freight Loading Study

Best Buy - 1717 Harrison Street, SF

Start Time	In Eastbound	Out Westbound
Total	**7**	**5**

Appendix B
Emissions and Health Risk Calculations

- CalEEMod Output
- Health Risk Calculations
- AERSCREEN Output
- OFFROAD-ORION Output
- EMFAC2017 Output

ESA

2675 Geary Boulevard - Whole Foods

Bay Area AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Supermarket	57.80	1000sqft	1.33	57,800.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	64
Climate Zone	5			**Operational Year**	2021
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MWhr)	641.35	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use -

Table Name	Column Name	Default Value	New Value

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	0.0516	0.4488	0.3380	6.1000e-004	0.0194	0.0234	0.0427	9.0100e-003	0.0221	0.0311	0.0000	52.3155	52.3155	0.0110	0.0000	52.5895
2021	0.4738	1.3328	1.2486	2.3700e-003	0.0191	0.0630	0.0821	5.2000e-003	0.0608	0.0660	0.0000	199.1977	199.1977	0.0318	0.0000	199.9913
Maximum	**0.4738**	**1.3328**	**1.2486**	**2.3700e-003**	**0.0194**	**0.0630**	**0.0821**	**9.0100e-003**	**0.0608**	**0.0660**	**0.0000**	**199.1977**	**199.1977**	**0.0318**	**0.0000**	**199.9913**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	0.0516	0.4488	0.3380	6.1000e-004	0.0194	0.0234	0.0427	9.0100e-003	0.0221	0.0311	0.0000	52.3154	52.3154	0.0110	0.0000	52.5894
2021	0.4738	1.3328	1.2486	2.3700e-003	0.0191	0.0630	0.0821	5.2000e-003	0.0608	0.0660	0.0000	199.1975	199.1975	0.0318	0.0000	199.9911
Maximum	**0.4738**	**1.3328**	**1.2486**	**2.3700e-003**	**0.0194**	**0.0630**	**0.0821**	**9.0100e-003**	**0.0608**	**0.0660**	**0.0000**	**199.1975**	**199.1975**	**0.0318**	**0.0000**	**199.9911**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	10-23-2020	1-22-2021	0.6322	0.6322
2	1-23-2021	4-22-2021	0.5310	0.5310
3	4-23-2021	7-22-2021	0.5364	0.5364
4	7-23-2021	9-30-2021	0.5844	0.5844
		Highest	0.6322	0.6322

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.2559	0.0000	5.3000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.0300e-003	1.0300e-003	0.0000	0.0000	1.1000e-003
Energy	0.0116	0.1055	0.0886	6.3000e-004		8.0100e-003	8.0100e-003		8.0100e-003	8.0100e-003	0.0000	743.3353	743.3353	0.0306	7.9800e-003	746.4803
Mobile	1.5472	6.5856	13.4741	0.0382	2.9896	0.0372	3.0268	0.8025	0.0349	0.8373	0.0000	3,508.5874	3,508.5874	0.1631	0.0000	3,512.6653
Waste						0.0000	0.0000		0.0000	0.0000	66.1730	0.0000	66.1730	3.9107	0.0000	163.9409
Water						0.0000	0.0000		0.0000	0.0000	2.2604	11.4398	13.7002	0.2327	5.5900e-003	21.1828
Total	**1.8147**	**6.6911**	**13.5632**	**0.0389**	**2.9896**	**0.0452**	**3.0348**	**0.8025**	**0.0429**	**0.8454**	**68.4334**	**4,263.3635**	**4,331.7970**	**4.3371**	**0.0136**	**4,444.2703**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.2559	0.0000	5.3000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.0300e-003	1.0300e-003	0.0000	0.0000	1.1000e-003
Energy	0.0116	0.1055	0.0886	6.3000e-004		8.0100e-003	8.0100e-003		8.0100e-003	8.0100e-003	0.0000	743.3353	743.3353	0.0306	7.9800e-003	746.4803
Mobile	1.5472	6.5856	13.4741	0.0382	2.9896	0.0372	3.0268	0.8025	0.0349	0.8373	0.0000	3,508.5874	3,508.5874	0.1631	0.0000	3,512.6653
Waste						0.0000	0.0000		0.0000	0.0000	66.1730	0.0000	66.1730	3.9107	0.0000	163.9409
Water						0.0000	0.0000		0.0000	0.0000	2.2604	11.4398	13.7002	0.2327	5.5900e-003	21.1828
Total	**1.8147**	**6.6911**	**13.5632**	**0.0389**	**2.9896**	**0.0452**	**3.0348**	**0.8025**	**0.0429**	**0.8454**	**68.4334**	**4,263.3635**	**4,331.7970**	**4.3371**	**0.0136**	**4,444.2703**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	10/23/2020	11/19/2020	5	20	
2	Site Preparation	Site Preparation	11/20/2020	11/23/2020	5	2	
3	Grading	Grading	11/24/2020	11/27/2020	5	4	
4	Building Construction	Building Construction	11/28/2020	9/3/2021	5	200	
5	Paving	Paving	9/4/2021	9/17/2021	5	10	
6	Architectural Coating	Architectural Coating	9/18/2021	10/1/2021	5	10	

Acres of Grading (Site Preparation Phase): 1

Acres of Grading (Grading Phase): 1.5

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 86,700; Non-Residential Outdoor: 28,900; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Site Preparation	Graders	1	8.00	187	0.41
Paving	Pavers	1	6.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Rubber Tired Dozers	1	6.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	6.00	187	0.41
Paving	Paving Equipment	1	8.00	132	0.36
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Building Construction	Welders	3	8.00	46	0.45

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	3	8.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	19.00	9.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	5	13.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	4.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0213	0.2095	0.1466	2.4000e-004		0.0115	0.0115		0.0108	0.0108	0.0000	21.0677	21.0677	5.4200e-003	0.0000	21.2031
Total	**0.0213**	**0.2095**	**0.1466**	**2.4000e-004**		**0.0115**	**0.0115**		**0.0108**	**0.0108**	**0.0000**	**21.0677**	**21.0677**	**5.4200e-003**	**0.0000**	**21.2031**

3.2 Demolition - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.3000e-004	3.1000e-004	3.1900e-003	1.0000e-005	1.0300e-003	1.0000e-005	1.0300e-003	2.7000e-004	1.0000e-005	2.8000e-004	0.0000	0.9000	0.9000	2.0000e-005	0.0000	0.9005
Total	**4.3000e-004**	**3.1000e-004**	**3.1900e-003**	**1.0000e-005**	**1.0300e-003**	**1.0000e-005**	**1.0300e-003**	**2.7000e-004**	**1.0000e-005**	**2.8000e-004**	**0.0000**	**0.9000**	**0.9000**	**2.0000e-005**	**0.0000**	**0.9005**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0213	0.2095	0.1466	2.4000e-004		0.0115	0.0115		0.0108	0.0108	0.0000	21.0676	21.0676	5.4200e-003	0.0000	21.2030
Total	**0.0213**	**0.2095**	**0.1466**	**2.4000e-004**		**0.0115**	**0.0115**		**0.0108**	**0.0108**	**0.0000**	**21.0676**	**21.0676**	**5.4200e-003**	**0.0000**	**21.2030**

3.2 Demolition - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.3000e-004	3.1000e-004	3.1900e-003	1.0000e-005	1.0300e-003	1.0000e-005	1.0300e-003	2.7000e-004	1.0000e-005	2.8000e-004	0.0000	0.9000	0.9000	2.0000e-005	0.0000	0.9005
Total	**4.3000e-004**	**3.1000e-004**	**3.1900e-003**	**1.0000e-005**	**1.0300e-003**	**1.0000e-005**	**1.0300e-003**	**2.7000e-004**	**1.0000e-005**	**2.8000e-004**	**0.0000**	**0.9000**	**0.9000**	**2.0000e-005**	**0.0000**	**0.9005**

3.3 Site Preparation - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					5.8000e-003	0.0000	5.8000e-003	2.9500e-003	0.0000	2.9500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.6300e-003	0.0184	7.7100e-003	2.0000e-005		8.2000e-004	8.2000e-004		7.6000e-004	7.6000e-004	0.0000	1.5127	1.5127	4.9000e-004	0.0000	1.5249
Total	**1.6300e-003**	**0.0184**	**7.7100e-003**	**2.0000e-005**	**5.8000e-003**	**8.2000e-004**	**6.6200e-003**	**2.9500e-003**	**7.6000e-004**	**3.7100e-003**	**0.0000**	**1.5127**	**1.5127**	**4.9000e-004**	**0.0000**	**1.5249**

3.3 Site Preparation - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.0000e-005	2.0000e-005	2.0000e-004	0.0000	6.0000e-005	0.0000	6.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0554	0.0554	0.0000	0.0000	0.0554
Total	**3.0000e-005**	**2.0000e-005**	**2.0000e-004**	**0.0000**	**6.0000e-005**	**0.0000**	**6.0000e-005**	**2.0000e-005**	**0.0000**	**2.0000e-005**	**0.0000**	**0.0554**	**0.0554**	**0.0000**	**0.0000**	**0.0554**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					5.8000e-003	0.0000	5.8000e-003	2.9500e-003	0.0000	2.9500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.6300e-003	0.0184	7.7100e-003	2.0000e-005		8.2000e-004	8.2000e-004		7.6000e-004	7.6000e-004	0.0000	1.5127	1.5127	4.9000e-004	0.0000	1.5249
Total	**1.6300e-003**	**0.0184**	**7.7100e-003**	**2.0000e-005**	**5.8000e-003**	**8.2000e-004**	**6.6200e-003**	**2.9500e-003**	**7.6000e-004**	**3.7100e-003**	**0.0000**	**1.5127**	**1.5127**	**4.9000e-004**	**0.0000**	**1.5249**

3.3 Site Preparation - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.0000e-005	2.0000e-005	2.0000e-004	0.0000	6.0000e-005	0.0000	6.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0554	0.0554	0.0000	0.0000	0.0554
Total	**3.0000e-005**	**2.0000e-005**	**2.0000e-004**	**0.0000**	**6.0000e-005**	**0.0000**	**6.0000e-005**	**2.0000e-005**	**0.0000**	**2.0000e-005**	**0.0000**	**0.0554**	**0.0554**	**0.0000**	**0.0000**	**0.0554**

3.4 Grading - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					9.8300e-003	0.0000	9.8300e-003	5.0500e-003	0.0000	5.0500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.7000e-003	0.0302	0.0129	3.0000e-005		1.3700e-003	1.3700e-003		1.2600e-003	1.2600e-003	0.0000	2.4779	2.4779	8.0000e-004	0.0000	2.4980
Total	**2.7000e-003**	**0.0302**	**0.0129**	**3.0000e-005**	**9.8300e-003**	**1.3700e-003**	**0.0112**	**5.0500e-003**	**1.2600e-003**	**6.3100e-003**	**0.0000**	**2.4779**	**2.4779**	**8.0000e-004**	**0.0000**	**2.4980**

3.4 Grading - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.0000e-005	4.0000e-005	3.9000e-004	0.0000	1.3000e-004	0.0000	1.3000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.1108	0.1108	0.0000	0.0000	0.1108
Total	**5.0000e-005**	**4.0000e-005**	**3.9000e-004**	**0.0000**	**1.3000e-004**	**0.0000**	**1.3000e-004**	**3.0000e-005**	**0.0000**	**3.0000e-005**	**0.0000**	**0.1108**	**0.1108**	**0.0000**	**0.0000**	**0.1108**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					9.8300e-003	0.0000	9.8300e-003	5.0500e-003	0.0000	5.0500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.7000e-003	0.0302	0.0129	3.0000e-005		1.3700e-003	1.3700e-003		1.2600e-003	1.2600e-003	0.0000	2.4779	2.4779	8.0000e-004	0.0000	2.4980
Total	**2.7000e-003**	**0.0302**	**0.0129**	**3.0000e-005**	**9.8300e-003**	**1.3700e-003**	**0.0112**	**5.0500e-003**	**1.2600e-003**	**6.3100e-003**	**0.0000**	**2.4779**	**2.4779**	**8.0000e-004**	**0.0000**	**2.4980**

3.4 Grading - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.0000e-005	4.0000e-005	3.9000e-004	0.0000	1.3000e-004	0.0000	1.3000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.1108	0.1108	0.0000	0.0000	0.1108
Total	**5.0000e-005**	**4.0000e-005**	**3.9000e-004**	**0.0000**	**1.3000e-004**	**0.0000**	**1.3000e-004**	**3.0000e-005**	**0.0000**	**3.0000e-005**	**0.0000**	**0.1108**	**0.1108**	**0.0000**	**0.0000**	**0.1108**

3.5 Building Construction - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0244	0.1775	0.1583	2.6000e-004		9.5500e-003	9.5500e-003		9.2300e-003	9.2300e-003	0.0000	21.7851	21.7851	4.0400e-003	0.0000	21.8862
Total	**0.0244**	**0.1775**	**0.1583**	**2.6000e-004**		**9.5500e-003**	**9.5500e-003**		**9.2300e-003**	**9.2300e-003**	**0.0000**	**21.7851**	**21.7851**	**4.0400e-003**	**0.0000**	**21.8862**

3.5 Building Construction - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	4.2000e-004	0.0125	3.1300e-003	3.0000e-005	7.1000e-004	6.0000e-005	7.7000e-004	2.0000e-004	6.0000e-005	2.6000e-004	0.0000	2.8277	2.8277	1.5000e-004	0.0000	2.8313
Worker	7.6000e-004	5.4000e-004	5.6000e-003	2.0000e-005	1.8000e-003	1.0000e-005	1.8100e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.5784	1.5784	4.0000e-005	0.0000	1.5794
Total	**1.1800e-003**	**0.0130**	**8.7300e-003**	**5.0000e-005**	**2.5100e-003**	**7.0000e-005**	**2.5800e-003**	**6.8000e-004**	**7.0000e-005**	**7.5000e-004**	**0.0000**	**4.4061**	**4.4061**	**1.9000e-004**	**0.0000**	**4.4107**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0244	0.1775	0.1583	2.6000e-004		9.5500e-003	9.5500e-003		9.2300e-003	9.2300e-003	0.0000	21.7850	21.7850	4.0400e-003	0.0000	21.8861
Total	**0.0244**	**0.1775**	**0.1583**	**2.6000e-004**		**9.5500e-003**	**9.5500e-003**		**9.2300e-003**	**9.2300e-003**	**0.0000**	**21.7850**	**21.7850**	**4.0400e-003**	**0.0000**	**21.8861**

3.5 Building Construction - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	4.2000e-004	0.0125	3.1300e-003	3.0000e-005	7.1000e-004	6.0000e-005	7.7000e-004	2.0000e-004	6.0000e-005	2.6000e-004	0.0000	2.8277	2.8277	1.5000e-004	0.0000	2.8313
Worker	7.6000e-004	5.4000e-004	5.6000e-003	2.0000e-005	1.8000e-003	1.0000e-005	1.8100e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.5784	1.5784	4.0000e-005	0.0000	1.5794
Total	**1.1800e-003**	**0.0130**	**8.7300e-003**	**5.0000e-005**	**2.5100e-003**	**7.0000e-005**	**2.5800e-003**	**6.8000e-004**	**7.0000e-005**	**7.5000e-004**	**0.0000**	**4.4061**	**4.4061**	**1.9000e-004**	**0.0000**	**4.4107**

3.5 Building Construction - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1595	1.2000	1.1352	1.9400e-003		0.0602	0.0602		0.0582	0.0582	0.0000	159.7619	159.7619	0.0285	0.0000	160.4750
Total	**0.1595**	**1.2000**	**1.1352**	**1.9400e-003**		**0.0602**	**0.0602**		**0.0582**	**0.0582**	**0.0000**	**159.7619**	**159.7619**	**0.0285**	**0.0000**	**160.4750**

3.5 Building Construction - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.5100e-003	0.0827	0.0207	2.1000e-004	5.1900e-003	1.8000e-004	5.3700e-003	1.5000e-003	1.7000e-004	1.6700e-003	0.0000	20.5400	20.5400	1.0100e-003	0.0000	20.5653
Worker	5.1300e-003	3.5400e-003	0.0375	1.2000e-004	0.0132	9.0000e-005	0.0133	3.5100e-003	8.0000e-005	3.5900e-003	0.0000	11.1688	11.1688	2.5000e-004	0.0000	11.1751
Total	**7.6400e-003**	**0.0863**	**0.0582**	**3.3000e-004**	**0.0184**	**2.7000e-004**	**0.0187**	**5.0100e-003**	**2.5000e-004**	**5.2600e-003**	**0.0000**	**31.7088**	**31.7088**	**1.2600e-003**	**0.0000**	**31.7403**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1595	1.2000	1.1351	1.9400e-003		0.0602	0.0602		0.0582	0.0582	0.0000	159.7617	159.7617	0.0285	0.0000	160.4748
Total	**0.1595**	**1.2000**	**1.1351**	**1.9400e-003**		**0.0602**	**0.0602**		**0.0582**	**0.0582**	**0.0000**	**159.7617**	**159.7617**	**0.0285**	**0.0000**	**160.4748**

3.5 Building Construction - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.5100e-003	0.0827	0.0207	2.1000e-004	5.1900e-003	1.8000e-004	5.3700e-003	1.5000e-003	1.7000e-004	1.6700e-003	0.0000	20.5400	20.5400	1.0100e-003	0.0000	20.5653
Worker	5.1300e-003	3.5400e-003	0.0375	1.2000e-004	0.0132	9.0000e-005	0.0133	3.5100e-003	8.0000e-005	3.5900e-003	0.0000	11.1688	11.1688	2.5000e-004	0.0000	11.1751
Total	**7.6400e-003**	**0.0863**	**0.0582**	**3.3000e-004**	**0.0184**	**2.7000e-004**	**0.0187**	**5.0100e-003**	**2.5000e-004**	**5.2600e-003**	**0.0000**	**31.7088**	**31.7088**	**1.2600e-003**	**0.0000**	**31.7403**

3.6 Paving - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	3.8700e-003	0.0387	0.0443	7.0000e-005		2.0800e-003	2.0800e-003		1.9100e-003	1.9100e-003	0.0000	5.8825	5.8825	1.8600e-003	0.0000	5.9291
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**3.8700e-003**	**0.0387**	**0.0443**	**7.0000e-005**		**2.0800e-003**	**2.0800e-003**		**1.9100e-003**	**1.9100e-003**	**0.0000**	**5.8825**	**5.8825**	**1.8600e-003**	**0.0000**	**5.9291**

3.6 Paving - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.0000e-004	1.4000e-004	1.4600e-003	0.0000	5.1000e-004	0.0000	5.2000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4342	0.4342	1.0000e-005	0.0000	0.4344
Total	**2.0000e-004**	**1.4000e-004**	**1.4600e-003**	**0.0000**	**5.1000e-004**	**0.0000**	**5.2000e-004**	**1.4000e-004**	**0.0000**	**1.4000e-004**	**0.0000**	**0.4342**	**0.4342**	**1.0000e-005**	**0.0000**	**0.4344**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	3.8700e-003	0.0387	0.0443	7.0000e-005		2.0800e-003	2.0800e-003		1.9100e-003	1.9100e-003	0.0000	5.8825	5.8825	1.8600e-003	0.0000	5.9291
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**3.8700e-003**	**0.0387**	**0.0443**	**7.0000e-005**		**2.0800e-003**	**2.0800e-003**		**1.9100e-003**	**1.9100e-003**	**0.0000**	**5.8825**	**5.8825**	**1.8600e-003**	**0.0000**	**5.9291**

3.6 Paving - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.0000e-004	1.4000e-004	1.4600e-003	0.0000	5.1000e-004	0.0000	5.2000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4342	0.4342	1.0000e-005	0.0000	0.4344
Total	**2.0000e-004**	**1.4000e-004**	**1.4600e-003**	**0.0000**	**5.1000e-004**	**0.0000**	**5.2000e-004**	**1.4000e-004**	**0.0000**	**1.4000e-004**	**0.0000**	**0.4342**	**0.4342**	**1.0000e-005**	**0.0000**	**0.4344**

3.7 Architectural Coating - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.3014					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.0900e-003	7.6300e-003	9.0900e-003	1.0000e-005		4.7000e-004	4.7000e-004		4.7000e-004	4.7000e-004	0.0000	1.2766	1.2766	9.0000e-005	0.0000	1.2788
Total	**0.3025**	**7.6300e-003**	**9.0900e-003**	**1.0000e-005**		**4.7000e-004**	**4.7000e-004**		**4.7000e-004**	**4.7000e-004**	**0.0000**	**1.2766**	**1.2766**	**9.0000e-005**	**0.0000**	**1.2788**

3.7 Architectural Coating - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.0000e-005	4.0000e-005	4.5000e-004	0.0000	1.6000e-004	0.0000	1.6000e-004	4.0000e-005	0.0000	4.0000e-005	0.0000	0.1336	0.1336	0.0000	0.0000	0.1337
Total	**6.0000e-005**	**4.0000e-005**	**4.5000e-004**	**0.0000**	**1.6000e-004**	**0.0000**	**1.6000e-004**	**4.0000e-005**	**0.0000**	**4.0000e-005**	**0.0000**	**0.1336**	**0.1336**	**0.0000**	**0.0000**	**0.1337**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.3014					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.0900e-003	7.6300e-003	9.0900e-003	1.0000e-005		4.7000e-004	4.7000e-004		4.7000e-004	4.7000e-004	0.0000	1.2766	1.2766	9.0000e-005	0.0000	1.2788
Total	**0.3025**	**7.6300e-003**	**9.0900e-003**	**1.0000e-005**		**4.7000e-004**	**4.7000e-004**		**4.7000e-004**	**4.7000e-004**	**0.0000**	**1.2766**	**1.2766**	**9.0000e-005**	**0.0000**	**1.2788**

3.7 Architectural Coating - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.0000e-005	4.0000e-005	4.5000e-004	0.0000	1.6000e-004	0.0000	1.6000e-004	4.0000e-005	0.0000	4.0000e-005	0.0000	0.1336	0.1336	0.0000	0.0000	0.1337
Total	**6.0000e-005**	**4.0000e-005**	**4.5000e-004**	**0.0000**	**1.6000e-004**	**0.0000**	**1.6000e-004**	**4.0000e-005**	**0.0000**	**4.0000e-005**	**0.0000**	**0.1336**	**0.1336**	**0.0000**	**0.0000**	**0.1337**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	1.5472	6.5856	13.4741	0.0382	2.9896	0.0372	3.0268	0.8025	0.0349	0.8373	0.0000	3,508.5874	3,508.5874	0.1631	0.0000	3,512.6653
Unmitigated	1.5472	6.5856	13.4741	0.0382	2.9896	0.0372	3.0268	0.8025	0.0349	0.8373	0.0000	3,508.5874	3,508.5874	0.1631	0.0000	3,512.6653

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Supermarket	5,909.47	10,264.70	9620.23	8,032,349	8,032,349
Total	5,909.47	10,264.70	9,620.23	8,032,349	8,032,349

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Supermarket	9.50	7.30	7.30	6.50	74.50	19.00	34	30	36

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Supermarket	0.575198	0.040076	0.193827	0.113296	0.016988	0.005361	0.017552	0.025197	0.002581	0.002349	0.005904	0.000881	0.000789

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	628.5328	628.5328	0.0284	5.8800e-003	630.9956
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	628.5328	628.5328	0.0284	5.8800e-003	630.9956
NaturalGas Mitigated	0.0116	0.1055	0.0886	6.3000e-004		8.0100e-003	8.0100e-003		8.0100e-003	8.0100e-003	0.0000	114.8024	114.8024	2.2000e-003	2.1000e-003	115.4846
NaturalGas Unmitigated	0.0116	0.1055	0.0886	6.3000e-004		8.0100e-003	8.0100e-003		8.0100e-003	8.0100e-003	0.0000	114.8024	114.8024	2.2000e-003	2.1000e-003	115.4846

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Supermarket	2.15132e+006	0.0116	0.1055	0.0886	6.3000e-004		8.0100e-003	8.0100e-003		8.0100e-003	8.0100e-003	0.0000	114.8024	114.8024	2.2000e-003	2.1000e-003	115.4846
Total		**0.0116**	**0.1055**	**0.0886**	**6.3000e-004**		**8.0100e-003**	**8.0100e-003**		**8.0100e-003**	**8.0100e-003**	**0.0000**	**114.8024**	**114.8024**	**2.2000e-003**	**2.1000e-003**	**115.4846**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Supermarket	2.15132e+006	0.0116	0.1055	0.0886	6.3000e-004		8.0100e-003	8.0100e-003		8.0100e-003	8.0100e-003	0.0000	114.8024	114.8024	2.2000e-003	2.1000e-003	115.4846
Total		**0.0116**	**0.1055**	**0.0886**	**6.3000e-004**		**8.0100e-003**	**8.0100e-003**		**8.0100e-003**	**8.0100e-003**	**0.0000**	**114.8024**	**114.8024**	**2.2000e-003**	**2.1000e-003**	**115.4846**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Supermarket	2.16056e+006	628.5328	0.0284	5.8800e-003	630.9956
Total		**628.5328**	**0.0284**	**5.8800e-003**	**630.9956**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Supermarket	2.16056e+006	628.5328	0.0284	5.8800e-003	630.9956
Total		**628.5328**	**0.0284**	**5.8800e-003**	**630.9956**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.2559	0.0000	5.3000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.0300e-003	1.0300e-003	0.0000	0.0000	1.1000e-003
Unmitigated	0.2559	0.0000	5.3000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.0300e-003	1.0300e-003	0.0000	0.0000	1.1000e-003

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0301					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.2257					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	5.0000e-005	0.0000	5.3000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.0300e-003	1.0300e-003	0.0000	0.0000	1.1000e-003
Total	**0.2559**	**0.0000**	**5.3000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**1.0300e-003**	**1.0300e-003**	**0.0000**	**0.0000**	**1.1000e-003**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0301					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.2257					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	5.0000e-005	0.0000	5.3000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.0300e-003	1.0300e-003	0.0000	0.0000	1.1000e-003
Total	**0.2559**	**0.0000**	**5.3000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**1.0300e-003**	**1.0300e-003**	**0.0000**	**0.0000**	**1.1000e-003**

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	13.7002	0.2327	5.5900e-003	21.1828
Unmitigated	13.7002	0.2327	5.5900e-003	21.1828

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Supermarket	7.1249 / 0.220358	13.7002	0.2327	5.5900e-003	21.1828
Total		**13.7002**	**0.2327**	**5.5900e-003**	**21.1828**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Supermarket	7.1249 / 0.220358	13.7002	0.2327	5.5900e-003	21.1828
Total		**13.7002**	**0.2327**	**5.5900e-003**	**21.1828**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	66.1730	3.9107	0.0000	163.9409
Unmitigated	66.1730	3.9107	0.0000	163.9409

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Supermarket	325.99	66.1730	3.9107	0.0000	163.9409
Total		**66.1730**	**3.9107**	**0.0000**	**163.9409**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Supermarket	325.99	66.1730	3.9107	0.0000	163.9409
Total		**66.1730**	**3.9107**	**0.0000**	**163.9409**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

2675 Geary Boulevard - Best Buy

Bay Area AQMD Air District, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Electronic Superstore	57.80	1000sqft	1.33	57,800.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	64
Climate Zone	5			**Operational Year**	2021
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MWhr)	641.35	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use -

Table Name	Column Name	Default Value	New Value

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	0.0516	0.4488	0.3380	6.1000e-004	0.0194	0.0234	0.0427	9.0100e-003	0.0221	0.0311	0.0000	52.3155	52.3155	0.0110	0.0000	52.5895
2021	0.4738	1.3328	1.2486	2.3700e-003	0.0191	0.0630	0.0821	5.2000e-003	0.0608	0.0660	0.0000	199.1977	199.1977	0.0318	0.0000	199.9913
Maximum	**0.4738**	**1.3328**	**1.2486**	**2.3700e-003**	**0.0194**	**0.0630**	**0.0821**	**9.0100e-003**	**0.0608**	**0.0660**	**0.0000**	**199.1977**	**199.1977**	**0.0318**	**0.0000**	**199.9913**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	0.0516	0.4488	0.3380	6.1000e-004	0.0194	0.0234	0.0427	9.0100e-003	0.0221	0.0311	0.0000	52.3154	52.3154	0.0110	0.0000	52.5894
2021	0.4738	1.3328	1.2486	2.3700e-003	0.0191	0.0630	0.0821	5.2000e-003	0.0608	0.0660	0.0000	199.1975	199.1975	0.0318	0.0000	199.9911
Maximum	**0.4738**	**1.3328**	**1.2486**	**2.3700e-003**	**0.0194**	**0.0630**	**0.0821**	**9.0100e-003**	**0.0608**	**0.0660**	**0.0000**	**199.1975**	**199.1975**	**0.0318**	**0.0000**	**199.9911**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	10-23-2020	1-22-2021	0.6322	0.6322
2	1-23-2021	4-22-2021	0.5310	0.5310
3	4-23-2021	7-22-2021	0.5364	0.5364
4	7-23-2021	9-30-2021	0.5844	0.5844
		Highest	0.6322	0.6322

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.2559	0.0000	5.3000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.0300e-003	1.0300e-003	0.0000	0.0000	1.1000e-003
Energy	1.4300e-003	0.0130	0.0110	8.0000e-005		9.9000e-004	9.9000e-004		9.9000e-004	9.9000e-004	0.0000	190.4062	190.4062	8.2400e-003	1.9100e-003	191.1810
Mobile	0.5552	2.3145	4.6173	0.0126	0.9641	0.0124	0.9765	0.2588	0.0116	0.2704	0.0000	1,153.6822	1,153.6822	0.0561	0.0000	1,155.0856
Waste						0.0000	0.0000		0.0000	0.0000	35.2798	0.0000	35.2798	2.0850	0.0000	87.4043
Water						0.0000	0.0000		0.0000	0.0000	1.3583	9.4112	10.7695	0.1399	3.3800e-003	15.2758
Total	**0.8125**	**2.3275**	**4.6288**	**0.0126**	**0.9641**	**0.0134**	**0.9774**	**0.2588**	**0.0126**	**0.2714**	**36.6381**	**1,353.5007**	**1,390.1388**	**2.2893**	**5.2900e-003**	**1,448.9478**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.2559	0.0000	5.3000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.0300e-003	1.0300e-003	0.0000	0.0000	1.1000e-003
Energy	1.4300e-003	0.0130	0.0110	8.0000e-005		9.9000e-004	9.9000e-004		9.9000e-004	9.9000e-004	0.0000	190.4062	190.4062	8.2400e-003	1.9100e-003	191.1810
Mobile	0.5552	2.3145	4.6173	0.0126	0.9641	0.0124	0.9765	0.2588	0.0116	0.2704	0.0000	1,153.6822	1,153.6822	0.0561	0.0000	1,155.0856
Waste						0.0000	0.0000		0.0000	0.0000	35.2798	0.0000	35.2798	2.0850	0.0000	87.4043
Water						0.0000	0.0000		0.0000	0.0000	1.3583	9.4112	10.7695	0.1399	3.3800e-003	15.2758
Total	**0.8125**	**2.3275**	**4.6288**	**0.0126**	**0.9641**	**0.0134**	**0.9774**	**0.2588**	**0.0126**	**0.2714**	**36.6381**	**1,353.5007**	**1,390.1388**	**2.2893**	**5.2900e-003**	**1,448.9478**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	10/23/2020	11/19/2020	5	20	
2	Site Preparation	Site Preparation	11/20/2020	11/23/2020	5	2	
3	Grading	Grading	11/24/2020	11/27/2020	5	4	
4	Building Construction	Building Construction	11/28/2020	9/3/2021	5	200	
5	Paving	Paving	9/4/2021	9/17/2021	5	10	
6	Architectural Coating	Architectural Coating	9/18/2021	10/1/2021	5	10	

Acres of Grading (Site Preparation Phase): 1

Acres of Grading (Grading Phase): 1.5

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 86,700; Non-Residential Outdoor: 28,900; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Cranes	1	6.00	231	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Site Preparation	Graders	1	8.00	187	0.41
Paving	Pavers	1	6.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Demolition	Rubber Tired Dozers	1	8.00	247	0.40
Grading	Rubber Tired Dozers	1	6.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	6.00	187	0.41
Paving	Paving Equipment	1	8.00	132	0.36
Site Preparation	Rubber Tired Dozers	1	7.00	247	0.40
Building Construction	Welders	3	8.00	46	0.45

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	3	8.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	19.00	9.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	5	13.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	4.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0213	0.2095	0.1466	2.4000e-004		0.0115	0.0115		0.0108	0.0108	0.0000	21.0677	21.0677	5.4200e-003	0.0000	21.2031
Total	**0.0213**	**0.2095**	**0.1466**	**2.4000e-004**		**0.0115**	**0.0115**		**0.0108**	**0.0108**	**0.0000**	**21.0677**	**21.0677**	**5.4200e-003**	**0.0000**	**21.2031**

3.2 Demolition - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.3000e-004	3.1000e-004	3.1900e-003	1.0000e-005	1.0300e-003	1.0000e-005	1.0300e-003	2.7000e-004	1.0000e-005	2.8000e-004	0.0000	0.9000	0.9000	2.0000e-005	0.0000	0.9005
Total	**4.3000e-004**	**3.1000e-004**	**3.1900e-003**	**1.0000e-005**	**1.0300e-003**	**1.0000e-005**	**1.0300e-003**	**2.7000e-004**	**1.0000e-005**	**2.8000e-004**	**0.0000**	**0.9000**	**0.9000**	**2.0000e-005**	**0.0000**	**0.9005**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0213	0.2095	0.1466	2.4000e-004		0.0115	0.0115		0.0108	0.0108	0.0000	21.0676	21.0676	5.4200e-003	0.0000	21.2030
Total	**0.0213**	**0.2095**	**0.1466**	**2.4000e-004**		**0.0115**	**0.0115**		**0.0108**	**0.0108**	**0.0000**	**21.0676**	**21.0676**	**5.4200e-003**	**0.0000**	**21.2030**

3.2 Demolition - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.3000e-004	3.1000e-004	3.1900e-003	1.0000e-005	1.0300e-003	1.0000e-005	1.0300e-003	2.7000e-004	1.0000e-005	2.8000e-004	0.0000	0.9000	0.9000	2.0000e-005	0.0000	0.9005
Total	**4.3000e-004**	**3.1000e-004**	**3.1900e-003**	**1.0000e-005**	**1.0300e-003**	**1.0000e-005**	**1.0300e-003**	**2.7000e-004**	**1.0000e-005**	**2.8000e-004**	**0.0000**	**0.9000**	**0.9000**	**2.0000e-005**	**0.0000**	**0.9005**

3.3 Site Preparation - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					5.8000e-003	0.0000	5.8000e-003	2.9500e-003	0.0000	2.9500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.6300e-003	0.0184	7.7100e-003	2.0000e-005		8.2000e-004	8.2000e-004		7.6000e-004	7.6000e-004	0.0000	1.5127	1.5127	4.9000e-004	0.0000	1.5249
Total	**1.6300e-003**	**0.0184**	**7.7100e-003**	**2.0000e-005**	**5.8000e-003**	**8.2000e-004**	**6.6200e-003**	**2.9500e-003**	**7.6000e-004**	**3.7100e-003**	**0.0000**	**1.5127**	**1.5127**	**4.9000e-004**	**0.0000**	**1.5249**

3.3 Site Preparation - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.0000e-005	2.0000e-005	2.0000e-004	0.0000	6.0000e-005	0.0000	6.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0554	0.0554	0.0000	0.0000	0.0554
Total	**3.0000e-005**	**2.0000e-005**	**2.0000e-004**	**0.0000**	**6.0000e-005**	**0.0000**	**6.0000e-005**	**2.0000e-005**	**0.0000**	**2.0000e-005**	**0.0000**	**0.0554**	**0.0554**	**0.0000**	**0.0000**	**0.0554**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					5.8000e-003	0.0000	5.8000e-003	2.9500e-003	0.0000	2.9500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.6300e-003	0.0184	7.7100e-003	2.0000e-005		8.2000e-004	8.2000e-004		7.6000e-004	7.6000e-004	0.0000	1.5127	1.5127	4.9000e-004	0.0000	1.5249
Total	**1.6300e-003**	**0.0184**	**7.7100e-003**	**2.0000e-005**	**5.8000e-003**	**8.2000e-004**	**6.6200e-003**	**2.9500e-003**	**7.6000e-004**	**3.7100e-003**	**0.0000**	**1.5127**	**1.5127**	**4.9000e-004**	**0.0000**	**1.5249**

3.3 Site Preparation - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.0000e-005	2.0000e-005	2.0000e-004	0.0000	6.0000e-005	0.0000	6.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0554	0.0554	0.0000	0.0000	0.0554
Total	**3.0000e-005**	**2.0000e-005**	**2.0000e-004**	**0.0000**	**6.0000e-005**	**0.0000**	**6.0000e-005**	**2.0000e-005**	**0.0000**	**2.0000e-005**	**0.0000**	**0.0554**	**0.0554**	**0.0000**	**0.0000**	**0.0554**

3.4 Grading - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					9.8300e-003	0.0000	9.8300e-003	5.0500e-003	0.0000	5.0500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.7000e-003	0.0302	0.0129	3.0000e-005		1.3700e-003	1.3700e-003		1.2600e-003	1.2600e-003	0.0000	2.4779	2.4779	8.0000e-004	0.0000	2.4980
Total	**2.7000e-003**	**0.0302**	**0.0129**	**3.0000e-005**	**9.8300e-003**	**1.3700e-003**	**0.0112**	**5.0500e-003**	**1.2600e-003**	**6.3100e-003**	**0.0000**	**2.4779**	**2.4779**	**8.0000e-004**	**0.0000**	**2.4980**

3.4 Grading - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.0000e-005	4.0000e-005	3.9000e-004	0.0000	1.3000e-004	0.0000	1.3000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.1108	0.1108	0.0000	0.0000	0.1108
Total	**5.0000e-005**	**4.0000e-005**	**3.9000e-004**	**0.0000**	**1.3000e-004**	**0.0000**	**1.3000e-004**	**3.0000e-005**	**0.0000**	**3.0000e-005**	**0.0000**	**0.1108**	**0.1108**	**0.0000**	**0.0000**	**0.1108**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					9.8300e-003	0.0000	9.8300e-003	5.0500e-003	0.0000	5.0500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.7000e-003	0.0302	0.0129	3.0000e-005		1.3700e-003	1.3700e-003		1.2600e-003	1.2600e-003	0.0000	2.4779	2.4779	8.0000e-004	0.0000	2.4980
Total	**2.7000e-003**	**0.0302**	**0.0129**	**3.0000e-005**	**9.8300e-003**	**1.3700e-003**	**0.0112**	**5.0500e-003**	**1.2600e-003**	**6.3100e-003**	**0.0000**	**2.4779**	**2.4779**	**8.0000e-004**	**0.0000**	**2.4980**

3.4 Grading - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.0000e-005	4.0000e-005	3.9000e-004	0.0000	1.3000e-004	0.0000	1.3000e-004	3.0000e-005	0.0000	3.0000e-005	0.0000	0.1108	0.1108	0.0000	0.0000	0.1108
Total	**5.0000e-005**	**4.0000e-005**	**3.9000e-004**	**0.0000**	**1.3000e-004**	**0.0000**	**1.3000e-004**	**3.0000e-005**	**0.0000**	**3.0000e-005**	**0.0000**	**0.1108**	**0.1108**	**0.0000**	**0.0000**	**0.1108**

3.5 Building Construction - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0244	0.1775	0.1583	2.6000e-004		9.5500e-003	9.5500e-003		9.2300e-003	9.2300e-003	0.0000	21.7851	21.7851	4.0400e-003	0.0000	21.8862
Total	**0.0244**	**0.1775**	**0.1583**	**2.6000e-004**		**9.5500e-003**	**9.5500e-003**		**9.2300e-003**	**9.2300e-003**	**0.0000**	**21.7851**	**21.7851**	**4.0400e-003**	**0.0000**	**21.8862**

3.5 Building Construction - 2020

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	4.2000e-004	0.0125	3.1300e-003	3.0000e-005	7.1000e-004	6.0000e-005	7.7000e-004	2.0000e-004	6.0000e-005	2.6000e-004	0.0000	2.8277	2.8277	1.5000e-004	0.0000	2.8313
Worker	7.6000e-004	5.4000e-004	5.6000e-003	2.0000e-005	1.8000e-003	1.0000e-005	1.8100e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.5784	1.5784	4.0000e-005	0.0000	1.5794
Total	**1.1800e-003**	**0.0130**	**8.7300e-003**	**5.0000e-005**	**2.5100e-003**	**7.0000e-005**	**2.5800e-003**	**6.8000e-004**	**7.0000e-005**	**7.5000e-004**	**0.0000**	**4.4061**	**4.4061**	**1.9000e-004**	**0.0000**	**4.4107**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0244	0.1775	0.1583	2.6000e-004		9.5500e-003	9.5500e-003		9.2300e-003	9.2300e-003	0.0000	21.7850	21.7850	4.0400e-003	0.0000	21.8861
Total	**0.0244**	**0.1775**	**0.1583**	**2.6000e-004**		**9.5500e-003**	**9.5500e-003**		**9.2300e-003**	**9.2300e-003**	**0.0000**	**21.7850**	**21.7850**	**4.0400e-003**	**0.0000**	**21.8861**

3.5 Building Construction - 2020

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	4.2000e-004	0.0125	3.1300e-003	3.0000e-005	7.1000e-004	6.0000e-005	7.7000e-004	2.0000e-004	6.0000e-005	2.6000e-004	0.0000	2.8277	2.8277	1.5000e-004	0.0000	2.8313
Worker	7.6000e-004	5.4000e-004	5.6000e-003	2.0000e-005	1.8000e-003	1.0000e-005	1.8100e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.5784	1.5784	4.0000e-005	0.0000	1.5794
Total	**1.1800e-003**	**0.0130**	**8.7300e-003**	**5.0000e-005**	**2.5100e-003**	**7.0000e-005**	**2.5800e-003**	**6.8000e-004**	**7.0000e-005**	**7.5000e-004**	**0.0000**	**4.4061**	**4.4061**	**1.9000e-004**	**0.0000**	**4.4107**

3.5 Building Construction - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1595	1.2000	1.1352	1.9400e-003		0.0602	0.0602		0.0582	0.0582	0.0000	159.7619	159.7619	0.0285	0.0000	160.4750
Total	**0.1595**	**1.2000**	**1.1352**	**1.9400e-003**		**0.0602**	**0.0602**		**0.0582**	**0.0582**	**0.0000**	**159.7619**	**159.7619**	**0.0285**	**0.0000**	**160.4750**

3.5 Building Construction - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.5100e-003	0.0827	0.0207	2.1000e-004	5.1900e-003	1.8000e-004	5.3700e-003	1.5000e-003	1.7000e-004	1.6700e-003	0.0000	20.5400	20.5400	1.0100e-003	0.0000	20.5653
Worker	5.1300e-003	3.5400e-003	0.0375	1.2000e-004	0.0132	9.0000e-005	0.0133	3.5100e-003	8.0000e-005	3.5900e-003	0.0000	11.1688	11.1688	2.5000e-004	0.0000	11.1751
Total	**7.6400e-003**	**0.0863**	**0.0582**	**3.3000e-004**	**0.0184**	**2.7000e-004**	**0.0187**	**5.0100e-003**	**2.5000e-004**	**5.2600e-003**	**0.0000**	**31.7088**	**31.7088**	**1.2600e-003**	**0.0000**	**31.7403**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.1595	1.2000	1.1351	1.9400e-003		0.0602	0.0602		0.0582	0.0582	0.0000	159.7617	159.7617	0.0285	0.0000	160.4748
Total	**0.1595**	**1.2000**	**1.1351**	**1.9400e-003**		**0.0602**	**0.0602**		**0.0582**	**0.0582**	**0.0000**	**159.7617**	**159.7617**	**0.0285**	**0.0000**	**160.4748**

3.5 Building Construction - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.5100e-003	0.0827	0.0207	2.1000e-004	5.1900e-003	1.8000e-004	5.3700e-003	1.5000e-003	1.7000e-004	1.6700e-003	0.0000	20.5400	20.5400	1.0100e-003	0.0000	20.5653
Worker	5.1300e-003	3.5400e-003	0.0375	1.2000e-004	0.0132	9.0000e-005	0.0133	3.5100e-003	8.0000e-005	3.5900e-003	0.0000	11.1688	11.1688	2.5000e-004	0.0000	11.1751
Total	**7.6400e-003**	**0.0863**	**0.0582**	**3.3000e-004**	**0.0184**	**2.7000e-004**	**0.0187**	**5.0100e-003**	**2.5000e-004**	**5.2600e-003**	**0.0000**	**31.7088**	**31.7088**	**1.2600e-003**	**0.0000**	**31.7403**

3.6 Paving - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	3.8700e-003	0.0387	0.0443	7.0000e-005		2.0800e-003	2.0800e-003		1.9100e-003	1.9100e-003	0.0000	5.8825	5.8825	1.8600e-003	0.0000	5.9291
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**3.8700e-003**	**0.0387**	**0.0443**	**7.0000e-005**		**2.0800e-003**	**2.0800e-003**		**1.9100e-003**	**1.9100e-003**	**0.0000**	**5.8825**	**5.8825**	**1.8600e-003**	**0.0000**	**5.9291**

3.6 Paving - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.0000e-004	1.4000e-004	1.4600e-003	0.0000	5.1000e-004	0.0000	5.2000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4342	0.4342	1.0000e-005	0.0000	0.4344
Total	**2.0000e-004**	**1.4000e-004**	**1.4600e-003**	**0.0000**	**5.1000e-004**	**0.0000**	**5.2000e-004**	**1.4000e-004**	**0.0000**	**1.4000e-004**	**0.0000**	**0.4342**	**0.4342**	**1.0000e-005**	**0.0000**	**0.4344**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	3.8700e-003	0.0387	0.0443	7.0000e-005		2.0800e-003	2.0800e-003		1.9100e-003	1.9100e-003	0.0000	5.8825	5.8825	1.8600e-003	0.0000	5.9291
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**3.8700e-003**	**0.0387**	**0.0443**	**7.0000e-005**		**2.0800e-003**	**2.0800e-003**		**1.9100e-003**	**1.9100e-003**	**0.0000**	**5.8825**	**5.8825**	**1.8600e-003**	**0.0000**	**5.9291**

3.6 Paving - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.0000e-004	1.4000e-004	1.4600e-003	0.0000	5.1000e-004	0.0000	5.2000e-004	1.4000e-004	0.0000	1.4000e-004	0.0000	0.4342	0.4342	1.0000e-005	0.0000	0.4344
Total	**2.0000e-004**	**1.4000e-004**	**1.4600e-003**	**0.0000**	**5.1000e-004**	**0.0000**	**5.2000e-004**	**1.4000e-004**	**0.0000**	**1.4000e-004**	**0.0000**	**0.4342**	**0.4342**	**1.0000e-005**	**0.0000**	**0.4344**

3.7 Architectural Coating - 2021

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.3014					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.0900e-003	7.6300e-003	9.0900e-003	1.0000e-005		4.7000e-004	4.7000e-004		4.7000e-004	4.7000e-004	0.0000	1.2766	1.2766	9.0000e-005	0.0000	1.2788
Total	**0.3025**	**7.6300e-003**	**9.0900e-003**	**1.0000e-005**		**4.7000e-004**	**4.7000e-004**		**4.7000e-004**	**4.7000e-004**	**0.0000**	**1.2766**	**1.2766**	**9.0000e-005**	**0.0000**	**1.2788**

3.7 Architectural Coating - 2021

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.0000e-005	4.0000e-005	4.5000e-004	0.0000	1.6000e-004	0.0000	1.6000e-004	4.0000e-005	0.0000	4.0000e-005	0.0000	0.1336	0.1336	0.0000	0.0000	0.1337
Total	**6.0000e-005**	**4.0000e-005**	**4.5000e-004**	**0.0000**	**1.6000e-004**	**0.0000**	**1.6000e-004**	**4.0000e-005**	**0.0000**	**4.0000e-005**	**0.0000**	**0.1336**	**0.1336**	**0.0000**	**0.0000**	**0.1337**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.3014					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.0900e-003	7.6300e-003	9.0900e-003	1.0000e-005		4.7000e-004	4.7000e-004		4.7000e-004	4.7000e-004	0.0000	1.2766	1.2766	9.0000e-005	0.0000	1.2788
Total	**0.3025**	**7.6300e-003**	**9.0900e-003**	**1.0000e-005**		**4.7000e-004**	**4.7000e-004**		**4.7000e-004**	**4.7000e-004**	**0.0000**	**1.2766**	**1.2766**	**9.0000e-005**	**0.0000**	**1.2788**

3.7 Architectural Coating - 2021

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	6.0000e-005	4.0000e-005	4.5000e-004	0.0000	1.6000e-004	0.0000	1.6000e-004	4.0000e-005	0.0000	4.0000e-005	0.0000	0.1336	0.1336	0.0000	0.0000	0.1337
Total	**6.0000e-005**	**4.0000e-005**	**4.5000e-004**	**0.0000**	**1.6000e-004**	**0.0000**	**1.6000e-004**	**4.0000e-005**	**0.0000**	**4.0000e-005**	**0.0000**	**0.1336**	**0.1336**	**0.0000**	**0.0000**	**0.1337**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.5552	2.3145	4.6173	0.0126	0.9641	0.0124	0.9765	0.2588	0.0116	0.2704	0.0000	1,153.6822	1,153.6822	0.0561	0.0000	1,155.0856
Unmitigated	0.5552	2.3145	4.6173	0.0126	0.9641	0.0124	0.9765	0.2588	0.0116	0.2704	0.0000	1,153.6822	1,153.6822	0.0561	0.0000	1,155.0856

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Electronic Superstore	2,603.31	2,603.31	2603.31	2,590,235	2,590,235
Total	2,603.31	2,603.31	2,603.31	2,590,235	2,590,235

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Electronic Superstore	9.50	7.30	7.30	15.50	65.50	19.00	27	33	40

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Electronic Superstore	0.575198	0.040076	0.193827	0.113296	0.016988	0.005361	0.017552	0.025197	0.002581	0.002349	0.005904	0.000881	0.000789

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	176.2179	176.2179	7.9700e-003	1.6500e-003	176.9084
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	176.2179	176.2179	7.9700e-003	1.6500e-003	176.9084
NaturalGas Mitigated	1.4300e-003	0.0130	0.0110	8.0000e-005		9.9000e-004	9.9000e-004		9.9000e-004	9.9000e-004	0.0000	14.1884	14.1884	2.7000e-004	2.6000e-004	14.2727
NaturalGas Unmitigated	1.4300e-003	0.0130	0.0110	8.0000e-005		9.9000e-004	9.9000e-004		9.9000e-004	9.9000e-004	0.0000	14.1884	14.1884	2.7000e-004	2.6000e-004	14.2727

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Electronic Superstore	265880	1.4300e-003	0.0130	0.0110	8.0000e-005		9.9000e-004	9.9000e-004		9.9000e-004	9.9000e-004	0.0000	14.1884	14.1884	2.7000e-004	2.6000e-004	14.2727
Total		**1.4300e-003**	**0.0130**	**0.0110**	**8.0000e-005**		**9.9000e-004**	**9.9000e-004**		**9.9000e-004**	**9.9000e-004**	**0.0000**	**14.1884**	**14.1884**	**2.7000e-004**	**2.6000e-004**	**14.2727**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Electronic Superstore	265880	1.4300e-003	0.0130	0.0110	8.0000e-005		9.9000e-004	9.9000e-004		9.9000e-004	9.9000e-004	0.0000	14.1884	14.1884	2.7000e-004	2.6000e-004	14.2727
Total		**1.4300e-003**	**0.0130**	**0.0110**	**8.0000e-005**		**9.9000e-004**	**9.9000e-004**		**9.9000e-004**	**9.9000e-004**	**0.0000**	**14.1884**	**14.1884**	**2.7000e-004**	**2.6000e-004**	**14.2727**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Electronic Superstore	605744	176.2179	7.9700e-003	1.6500e-003	176.9084
Total		**176.2179**	**7.9700e-003**	**1.6500e-003**	**176.9084**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Electronic Superstore	605744	176.2179	7.9700e-003	1.6500e-003	176.9084
Total		**176.2179**	**7.9700e-003**	**1.6500e-003**	**176.9084**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.2559	0.0000	5.3000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.0300e-003	1.0300e-003	0.0000	0.0000	1.1000e-003
Unmitigated	0.2559	0.0000	5.3000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.0300e-003	1.0300e-003	0.0000	0.0000	1.1000e-003

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0301					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.2257					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	5.0000e-005	0.0000	5.3000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.0300e-003	1.0300e-003	0.0000	0.0000	1.1000e-003
Total	**0.2559**	**0.0000**	**5.3000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**1.0300e-003**	**1.0300e-003**	**0.0000**	**0.0000**	**1.1000e-003**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0301					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.2257					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	5.0000e-005	0.0000	5.3000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.0300e-003	1.0300e-003	0.0000	0.0000	1.1000e-003
Total	**0.2559**	**0.0000**	**5.3000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**1.0300e-003**	**1.0300e-003**	**0.0000**	**0.0000**	**1.1000e-003**

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	10.7695	0.1399	3.3800e-003	15.2758
Unmitigated	10.7695	0.1399	3.3800e-003	15.2758

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Electronic Superstore	4.28139 / 2.62408	10.7695	0.1399	3.3800e-003	15.2758
Total		**10.7695**	**0.1399**	**3.3800e-003**	**15.2758**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Electronic Superstore	4.28139 / 2.62408	10.7695	0.1399	3.3800e-003	15.2758
Total		**10.7695**	**0.1399**	**3.3800e-003**	**15.2758**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	35.2798	2.0850	0.0000	87.4043
Unmitigated	35.2798	2.0850	0.0000	87.4043

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Electronic Superstore	173.8	35.2798	2.0850	0.0000	87.4043
Total		**35.2798**	**2.0850**	**0.0000**	**87.4043**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Electronic Superstore	173.8	35.2798	2.0850	0.0000	87.4043
Total		**35.2798**	**2.0850**	**0.0000**	**87.4043**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

Delivery Truck Dwell Times per Day

Best Buy		
Loading Dock	No. Trucks	Dwell Time (min.)
semi	2	28
two axle six tire	4	28
Curbside		
four tire	1	90
semi	0	90
two axle six tire	2	90
four tire	5	90
Combined	No. Trucks	Idle Time (min.)*
four tire	6	10
two axle six tire	6	10
semi	2	10

*Assuming 5 min idling at arrival and 5 min idling prior to exiting

Whole Foods		
	No. Trucks	Idle Time (min.)*
semi	4	10
two axle six tire	4	10
bobtail or van	15	10
	No. TRUs	Dwell Time (min.)
semi	4	60
two axle six tire	4	30
bobtail or van	15	30

			PM10		PM2.5		
Emission Factors	EMFAC Vehicle Cat.	Fleet % Diesel	Idling EF (g/hr)	TRU EF (g/hr)	Idling EF (g/hr)	TRU EF (g/hr)	
four tire	MHDT	100.0%	0.170	NA	0.163	NA	
two axle six tire	HHDT	100.0%	0.063	1.372	0.060	1.262	TRU - Instate Truck TRU
semi	HHDT	100.0%	0.063	1.051	0.060	0.967	TRU - Instate Trailer TRU
bobtail or van	MHDT	100.0%	0.170	0.876	0.163	0.806	TRU - Instate Van TRU

conservatively assume 100% diesel

			ROG		NOX		
Emission Factors	EMFAC Vehicle Cat.	Fleet % Diesel	Idling EF (g/hr)	TRU EF (g/hr)	Idling EF (g/hr)	TRU EF (g/hr)	
four tire	MHDT	100.0%	0.833	NA	63.257	NA	
two axle six tire	HHDT	100.0%	2.324	3.405	46.167	33.044	TRU - Instate Truck TRU
semi	HHDT	100.0%	2.324	5.973	46.167	54.752	TRU - Instate Trailer TRU
bobtail or van	MHDT	100.0%	0.833	2.173	63.257	21.092	TRU - Instate Van TRU

conservatively assume 100% diesel

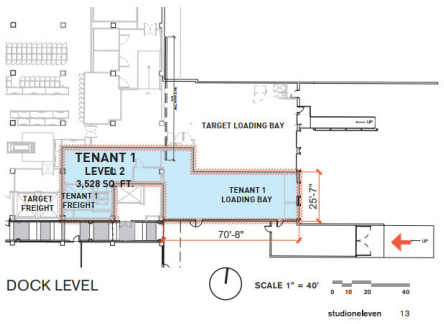
https://ww3.arb.ca.gov/msei/downloads/emfac2017-volume-i-users-guide.pdf
Appendix 4: Vehicle Categories

Medium-Heavy Duty Diesel Agriculture Truck that are using Ag truck exemptions of the T&B rule	MHDT	T6
Medium-Heavy Duty Diesel CA International Registration Plan Truck with GVWR>26000 lbs		
Medium-Heavy Duty Diesel CA International Registration Plan Truck with GVWR<=26000 lbs		
Medium-Heavy Duty Diesel instate construction Truck with GVWR>26000 lbs		
Medium-Heavy Duty Diesel instate construction Truck with GVWR<=26000 lbs		
Medium-Heavy Duty Diesel instate Truck with GVWR>26000 lbs		
Medium-Heavy Duty Diesel instate Truck with GVWR<=26000 lbs		
Medium-Heavy Duty Diesel Out-of-state Truck with GVWR>26000 lbs		
Medium-Heavy Duty Diesel Out-of-state Truck with GVWR<=26000 lbs		
Medium-Heavy Duty Diesel Public Fleet Truck		
Medium-Heavy Duty Diesel Utility Fleet Truck		
Medium-Heavy Duty Gasoline Truck		

Heavy-Heavy Duty Diesel Agriculture Truck that are using Ag truck exemptions of the T&B rule	HHDT	T7
Heavy-Heavy Duty Diesel CA International Registration Plan Truck		
Heavy-Heavy Duty Diesel CA International Registration Plan Construction Truck		
Heavy-Heavy Duty Diesel Non-Neighboring Out-of-state Truck		
Heavy-Heavy Duty Diesel Neighboring Out-of-state Truck		
Heavy-Heavy Duty Diesel Drayage Truck at Other Facilities		
Heavy-Heavy Duty Diesel Drayage Truck in Bay Area		
Heavy-Heavy Duty Diesel Drayage Truck near South Coast		
Heavy-Heavy Duty Diesel Public Fleet Truck		
Heavy-Heavy Duty Diesel Single Unit Truck		
Heavy-Heavy Duty Diesel Single Unit Construction Truck		
Heavy-Heavy Duty Diesel Solid Waste Collection Truck		
Heavy-Heavy Duty Diesel Tractor Truck		
Heavy-Heavy Duty Diesel Tractor Construction Truck		
Heavy-Heavy Duty Diesel Utility Fleet Truck		
Heavy-Heavy Duty Gasoline Truck		
Power Take Off		

2675 Geary Blvd
Source and Site Information

From: studioneleven, 2020. City Center Whole Foods Market Floor Plan Existing - Lot C, June 2020.



From: Google, 2020. Google Earth - Street View, April, 2019

Sources

TRU			Truck Idle		
RH =	5	m	RH =	2.55	m
VD =	3	m	IVD =	2.37	m
SL =	8.4	m	SL =	8.4	m
ILD =	SL/4.3		SL =	16.8	m
	1.96				
IVD =	VD/2.15				
	1.40				

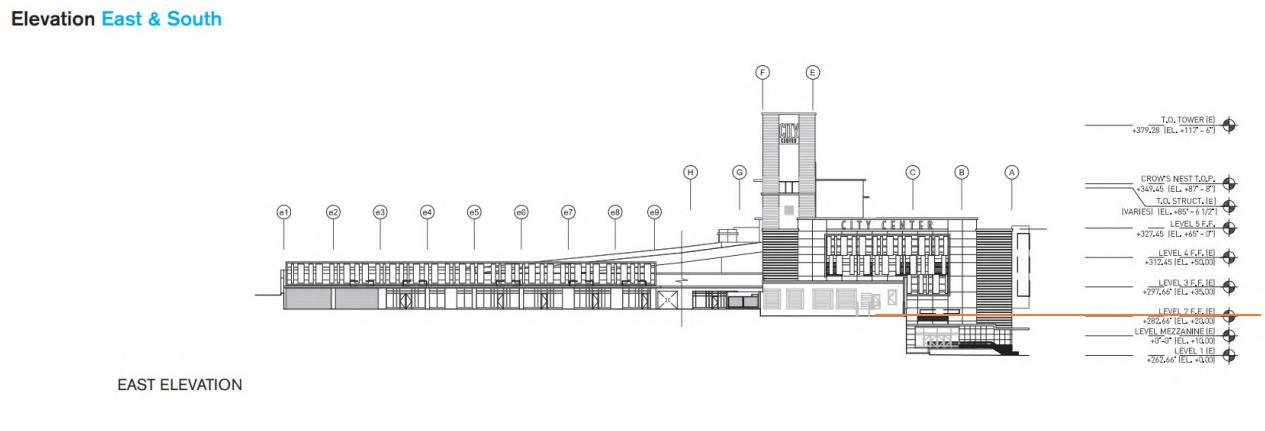
Release Height = RH
Verticle Dimension = VD
Side Length = SL
Initial Lateral Dimension = ILD
Initial Verticle Dimension = IVD

Receptors

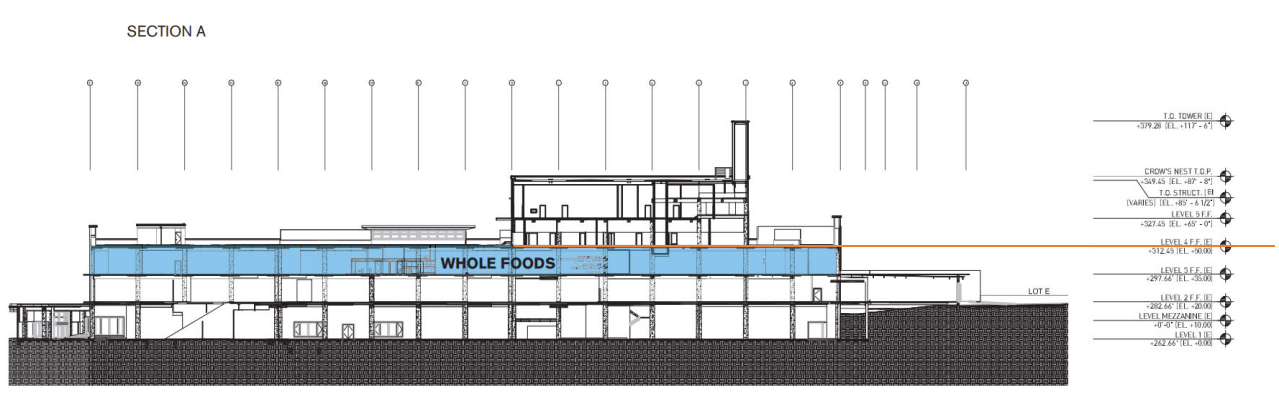
Dock Elevation	282.66	ft
Daycare Elevation	312.45	ft
Offsite Receptor Height	1.8	m
Daycare Receptor Height	10.9	m

Urban Population
San Francisco-Oakland-Berkeley, CA MSA
4,335,391

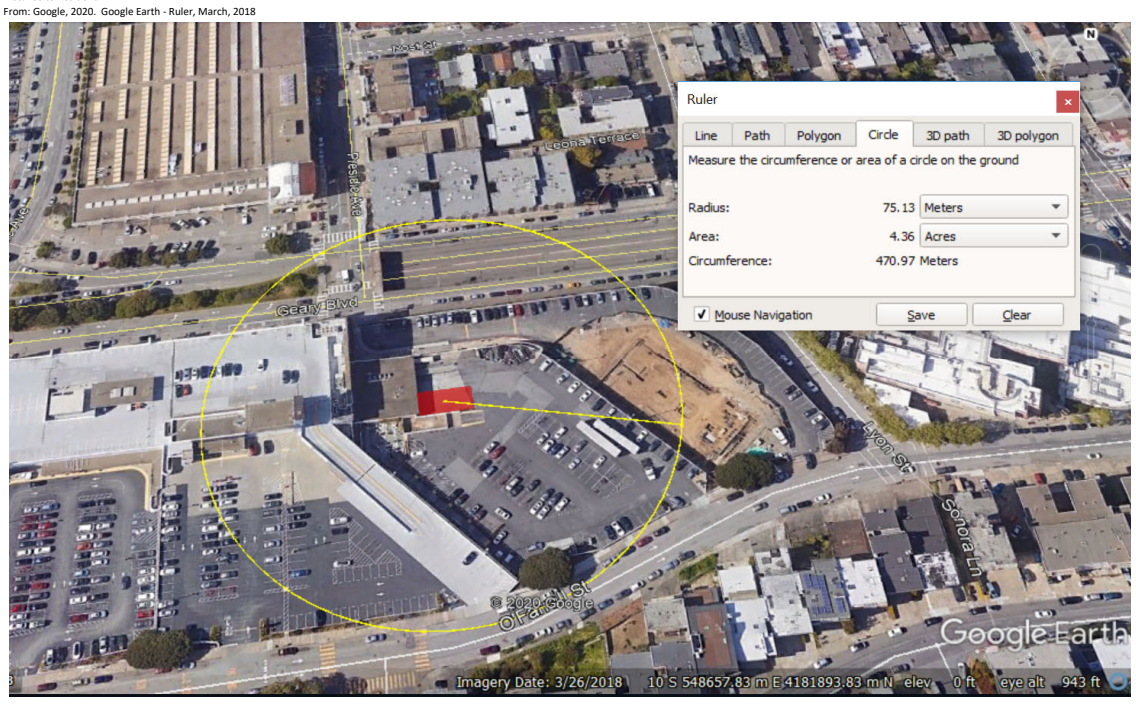
From: studioneleven, 2020. City Center Whole Foods Market Elevation East & South, June 2020.



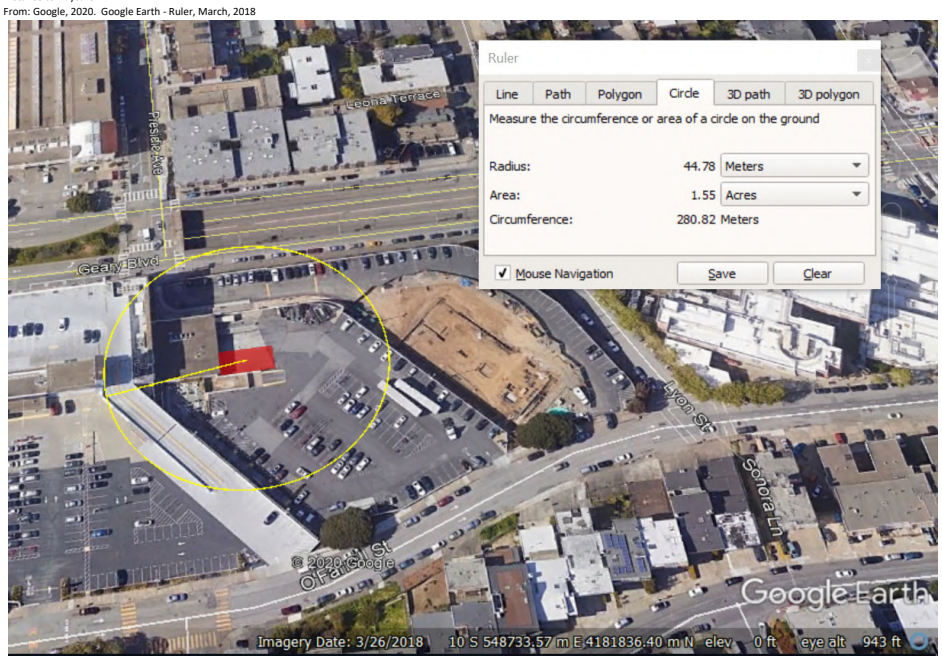
From: studioneleven, 2020. City Center Whole Foods Market Section A & B, June 2020.



Distance to Resident
From: Google, 2020. Google Earth - Ruler, March, 2018



Distance to Daycare
From: Google, 2020. Google Earth - Ruler, March, 2018



2675 Geary Blvd

Criteria Air Pollutants

Prior Operations (Best Buy)

Delivery Truck Idling			Trucks	Idle Time	ROG EF	NO_x EF	ROG	NO_x
Truck Type	EMFAC Vehicle Class	Fleet % Diesel	trip/day	min/trip	g/hr	g/hr	ton/yr	ton/yr
four tire	MHDT	100.0%	6	10	0.833	63.257	3.35E-04	2.55E-02
two axle six tire	HHDT	100.0%	6	10	2.324	46.167	9.35E-04	1.86E-02
semi	HHDT	100.0%	2	10	2.324	46.167	3.12E-04	6.19E-03
						total	1.58E-03	5.02E-02

New Operations (Whole Foods)

Delivery Truck Idling			Trucks	Idle Time	ROG EF	NO_x EF	ROG	NO_x
Truck Type	EMFAC Vehicle Class	Fleet % Diesel	trip/day	min/trip	g/hr	g/hr	ton/yr	ton/yr
semi	HHDT	100.0%	4	10	2.324	46.167	6.23E-04	1.24E-02
two axle six tire	HHDT	100.0%	4	10	2.324	46.167	6.23E-04	1.24E-02
bobtail or van	MHDT	100.0%	15	10	0.833	63.257	8.38E-04	6.36E-02
						total	2.09E-03	8.84E-02

Delivery Truck TRU			Trucks	Run Time	ROG EF	NO_x EF	ROG	NO_x
Truck Type	EMFAC Vehicle Class	Fleet % Diesel	trip/day	min/trip	g/hr	g/hr	ton/yr	ton/yr
semi	HHDT	100.0%	4	60	5.973	54.752	9.61E-03	8.81E-02
two axle six tire	HHDT	100.0%	4	30	3.405	33.044	2.74E-03	2.66E-02
bobtail or van	MHDT	100.0%	15	30	2.173	21.092	6.56E-03	6.36E-02
						total	1.89E-02	1.78E-01

Net New Operations (Whole Foods - Best Buy)

Truck Operation	ROG ton/yr	NO_x ton/yr	PM_{10} ton/yr	$PM_{2.5}$ ton/yr
Delivery Truck Idling	5.03E-04	3.82E-02	1.03E-04	9.84E-05
Delivery Truck TRU	1.89E-02	1.78E-01	5.44E-03	5.00E-03
Total	0.02	0.22	0.01	0.01

Truck Operation	ROG lb/day	NO_x lb/day	PM_{10} lb/day	$PM_{2.5}$ lb/day
Delivery Truck Idling	2.76E-03	2.09E-01	5.64E-04	5.39E-04
Delivery Truck TRU	1.04E-01	9.77E-01	2.98E-02	2.74E-02
Total	0.11	1.19	0.03	0.03

see HRA tab for particulate calculations

2675 Geary Blvd

Health Risk Assessment - Resident

Prior Operations (Best Buy)

Delivery Truck Idling			Trucks	Idle Time	PM_{10} EF	$PM_{2.5}$ EF	DPM	$PM_{2.5}$
Truck Type	EMFAC Vehicle Class	Fleet % Diesel	trip/day	min/trip	g/hr	g/hr	ton/yr	ton/yr
four tire	MHDT	100.0%	6	10	0.170	0.163	6.86E-05	6.56E-05
two axle six tire	HHDT	100.0%	6	10	0.063	0.060	2.54E-05	2.43E-05
semi	HHDT	100.0%	2	10	0.063	0.060	8.48E-06	8.11E-06
						total	1.03E-04	9.81E-05

New Operations (Whole Foods)

Delivery Truck Idling			Trucks	Idle Time	PM_{10} EF	$PM_{2.5}$ EF	DPM	$PM_{2.5}$
Truck Type	EMFAC Vehicle Class	Fleet % Diesel	trip/day	min/trip	g/hr	g/hr	ton/yr	ton/yr
semi	HHDT	100.0%	4	10	0.063	0.060	1.70E-05	1.62E-05
two axle six tire	HHDT	100.0%	4	10	0.063	0.060	1.70E-05	1.62E-05
bobtail or van	MHDT	100.0%	15	10	0.170	0.163	1.71E-04	1.64E-04
						total	2.05E-04	1.97E-04

Delivery Truck TRU			Trucks	Run Time	PM_{10} EF	$PM_{2.5}$ EF	DPM	$PM_{2.5}$
Truck Type	EMFAC Vehicle Class	Fleet % Diesel	trip/day	min/trip	g/hr	g/hr	ton/yr	ton/yr
semi	HHDT	100.0%	4	60	1.051	0.967	1.69E-03	1.56E-03
two axle six tire	HHDT	100.0%	4	30	1.372	1.262	1.10E-03	1.02E-03
bobtail or van	MHDT	100.0%	15	30	0.876	0.806	2.64E-03	2.43E-03
						total	5.44E-03	5.00E-03

Net New Operations (Whole Foods - Best Buy)

Truck Operation	DPM ton/yr	$PM_{2.5}$ ton/yr	DPM g/s	$PM_{2.5}$ g/s
Delivery Truck Idling	1.03E-04	9.84E-05	2.96E-06	2.83E-06
Delivery Truck TRU	5.44E-03	5.00E-03	1.56E-04	1.44E-04

MEIR

Source	Distance to MEIR meters	AERSCREEN OUT [ug/m^3]/[g/s] Max 1 HR	Annual
IDLE	75	736	73.6
TRU	75	216	21.6

Concentration at MEIR, C_{AIR}

Source	DPM ($\mu g/m^3$)	$PM_{2.5}$ ($\mu g/m^3$)
IDLE	2.18E-04	2.09E-04
TRU	3.38E-03	3.11E-03
Total	3.60E-03	3.32E-03

Cancer Risk = Dose inhalation × Inhalation CPF × ASF × ED/AT × FAH **(Equation 8.2.4 A)**

Where:

Cancer Risk = residential inhalation cancer risk

Dose inhalation (mg/kg-day) = C_{AIR} × DBR × A × EF × 10^{-6} **(Equation 5.4.1.1)**

Inhalation CPF = inhalation cancer potency factor ([mg/kg/day]$^{-1}$)
ASF = age sensitivity factor for a specified age group (unitless)
ED = exposure duration for a specified age group (years)
AT = averaging time period over which exposure is averaged in days (years)
FAH = fraction of time at home (unitless)

Where:

C_{AIR} = concentration of compound in air in micrograms per cubic meter ($\mu g/m^3$)
DBR = daily breathing rate in liter per kilogram of body weight per day (L/kg-body weight/day)
A = inhalation absorption factor (1 for DPM, unitless)
EF = exposure frequency in days per year (unitless, days/365 days)
10^{-6} = micrograms to milligrams conversion, liters to cubic meters conversior

Hazard Quotient = C_{air} / REL **(Section 8.3.1)**

Where:

Hazard Quotient = chronic non-cancer hazard
C_{AIR} = concentration of compound in air in micrograms per cubic meter ($\mu g/m^3$)
REL = Chronic non-cancer Reference Exposure Level for substance ($\mu g/m^3$)

Dose Inhalation Inputs

Receptor Type	Exposure Scenario	Receptor Group Age	C_{AIR} ($\mu g/m^3$)	DBR (L/kg-day)	A (unitless)	EF (days/year)
Off-Site Child Resident	Net New Operations	3rd Trimester	3.60E-03	361	1	0.96
		Age 0<2	3.60E-03	1090	1	0.96
		Age 2<16	3.60E-03	572	1	0.96
		Age 16<30	3.60E-03	261	1	0.96

Dose Inhalation Outputs

Receptor Type	Exposure Scenario	Receptor Group Age	Dose inhalation
Off-Site Child Resident	Net New Operations	3rd Trimester	1.24E-06
		Age 0<2	3.76E-06
		Age 2<16	1.97E-06
		Age 16<30	9.01E-07

Risk Inputs

Receptor Type	Exposure Scenario	Receptor Group Age	CPF (mg/kg-day^{-1})	ASF (unitless)	ED (years)	AT (years)	FAH (unitless)	MAF (unitless)
Off-Site Child Resident	Net New Operations	3rd Trimester	1.1	10	0.25	70.00	1	1
		Age 0<2	1.1	10	2.00	70.00	1	1
		Age 2<16	1.1	3	14.00	70.00	1	1
		Age 16<30	1.1	1	14.00	70.00	0.73	1

Pollutant	REL ($\mu g/m^3$)
DPM	5

Risk Outputs

Receptor Type	Exposure Scenario	Receptor Group Age	Cancer Risk
Off-Site Child Resident	Net New Operations	3rd Trimester	4.89E-08
		Age 0<2	1.18E-06
		Age 2<16	1.30E-06
		Age 16<30	1.45E-07
		Total Cancer Risk (per million)	**2.68**
		Non-Cancer Chronic Risk	**0.00**
		Annual Average $PM_{2.5}$ ($\mu g/m^3$)	**0.00**

SOURCE:

Office of Environmental Health Hazard Assessment, 2015. *Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments.* February.

BAAQMD, 2016. *BAAQMD Air Toxics NSR Program HRA Guidelines.* December

NOTE:

Daily breathing rate is based on the OEHHA 95th percentile breathing rate for age third trimester to 2, and 80th percentile for ages greater than 2 (Table 5.8).

Fraction of time at home is conservatively set to 1 for residents age < 16 since the nearest school cancer risk was not estimated but nearest daycare risk is >1 per million, per OEHHA Table 8.4.

Modeling Adjustment Factor of 1 because it is assumed that truck deliveries occur 24 hours a day, 7 days a week.

Inhalation cancer potency factor from Table 7.1

2675 Geary Blvd

Health Risk Assessment - Resident

Prior Operations (Best Buy)

Delivery Truck Idling			Trucks	Idle Time	PM_{10} EF	$PM_{2.5}$ EF	DPM	$PM_{2.5}$
Truck Type	EMFAC Vehicle Class	Fleet % Diesel	trip/day	min/trip	g/hr	g/hr	ton/yr	ton/yr
four tire	MHDT	100.0%	6	10	0.170	0.163	6.86E-05	6.56E-05
two axle six tire	HHDT	100.0%	6	10	0.063	0.060	2.54E-05	2.43E-05
semi	HHDT	100.0%	2	10	0.063	0.060	8.48E-06	8.11E-06
						total	1.03E-04	9.81E-05

New Operations (Whole Foods)

Delivery Truck Idling			Trucks	Idle Time	PM_{10} EF	$PM_{2.5}$ EF	DPM	$PM_{2.5}$
Truck Type	EMFAC Vehicle Class	Fleet % Diesel	trip/day	min/trip	g/hr	g/hr	ton/yr	ton/yr
semi	HHDT	100.0%	4	10	0.063	0.060	1.70E-05	1.62E-05
two axle six tire	HHDT	100.0%	4	10	0.063	0.060	1.70E-05	1.62E-05
bobtail or van	MHDT	100.0%	15	10	0.170	0.163	1.71E-04	1.64E-04
						total	2.05E-04	1.97E-04

Delivery Truck TRU			Trucks	Run Time	PM_{10} EF	$PM_{2.5}$ EF	DPM	$PM_{2.5}$
Truck Type	EMFAC Vehicle Class	Fleet % Diesel	trip/day	min/trip	g/hr	g/hr	ton/yr	ton/yr
semi	HHDT	100.0%	4	60	1.051	0.967	1.69E-03	1.56E-03
two axle six tire	HHDT	100.0%	4	30	1.372	1.262	1.10E-03	1.02E-03
bobtail or van	MHDT	100.0%	15	30	0.876	0.806	2.64E-03	2.43E-03
						total	5.44E-03	5.00E-03

Net New Operations (Whole Foods - Best Buy)

Truck Operation	DPM ton/yr	$PM_{2.5}$ ton/yr	DPM g/s	$PM_{2.5}$ g/s
Delivery Truck Idling	1.03E-04	9.84E-05	2.96E-06	2.83E-06
Delivery Truck TRU	5.44E-03	5.00E-03	1.56E-04	1.44E-04

MEIR

Source	Distance to MEIR meters	AERSCREEN OUT [ug/m^3]/[g/s] Max 1 HR	Annual
IDLE	45	1301	130.1
TRU	45	442.7	44.3

Concentration at MEIR, C_{AIR}

Source	DPM ($\mu g/m^3$)	$PM_{2.5}$ ($\mu g/m^3$)
IDLE	3.85E-04	3.68E-04
TRU	6.92E-03	6.37E-03
Total	7.31E-03	6.74E-03

Cancer Risk = Dose inhalation × Inhalation CPF × ASF × ED/AT × FAH **(Equation 8.2.4 A)**

Where:

Cancer Risk = residential inhalation cancer risk

Dose inhalation (mg/kg-day) = C_{AIR} × DBR × A × EF × 10^{-6} **(Equation 5.4.1.1)**

Inhalation CPF = inhalation cancer potency factor ([mg/kg/day]$^{-1}$)
ASF = age sensitivity factor for a specified age group (unitless)
ED = exposure duration for a specified age group (years)
AT = averaging time period over which exposure is averaged in days (years)
FAH = fraction of time at home (unitless)

Where:

C_{AIR} = concentration of compound in air in micrograms per cubic meter ($\mu g/m^3$)
DBR = daily breathing rate in liter per kilogram of body weight per day (L/kg-body weight/day)
A = inhalation absorption factor (1 for DPM, unitless)
EF = exposure frequency in days per year (unitless, days/365 days)
10^{-6} = micrograms to milligrams conversion, liters to cubic meters conversion

Hazard Quotient = C_{air} / REL **(Section 8.3.1)**

Where:

Hazard Quotient = chronic non-cancer hazard
C_{AIR} = concentration of compound in air in micrograms per cubic meter ($\mu g/m^3$)
REL = Chronic non-cancer Reference Exposure Level for substance ($\mu g/m^3$)

Dose Inhalation Inputs

Receptor Type	Exposure Scenario	Receptor Group Age	C_{AIR} ($\mu g/m^3$)	8HR-BR (L/kg-day)	A (unitless)	EF (days/year)
Daycare	Net New Operations	Age 0<2	7.31E-03	1200	1	0.68
		Age 2<16	7.31E-03	520	1	0.68

Dose Inhalation Outputs

Receptor Type	Exposure Scenario	Receptor Group Age	Dose inhalation (mg/kg-day)
Daycare	Net New Operations	Age 0<2	6.01E-06
		Age 2<16	2.60E-06

Risk Inputs

Receptor Type	Exposure Scenario	Receptor Group Age	CPF (mg/kg-day^{-1})	ASF (unitless)	ED (years)	AT (years)	FAH (unitless)	MAF (unitless)
Daycare	Net New Operations	Age 0<2	1.1	10	2.00	70.00	1	1
		Age 2<16	1.1	3	4.00	70.00	1	1

Pollutant	REL ($\mu g/m^3$)
DPM	5

Risk Outputs

Receptor Type	Exposure Scenario	Receptor Group Age	Cancer Risk
Daycare	Net New Operations	Age 0<2	1.89E-06
		Age 2<16	4.91E-07
		Total Cancer Risk (per million)	**2.38**
		Non-Cancer Chronic Risk	**0.00**
		Annual Average $PM_{2.5}$ ($\mu g/m^3$)	**0.01**

SOURCE:

Office of Environmental Health Hazard Assessment, 2015.*Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments* . February.
BAAQMD, 2016. *BAAQMD Air Toxics NSR Program HRA Guidelines.* December

NOTE:

Daily breathing rate for daycare receptor is based on the OEHHA 95th percentile 8-hour moderate intensity breathing rates (Table 5.8).
Modeling Adjustment Factor of 1 because it is assumed that truck deliveries occur 24 hours a day, 7 days a week.
Inhalation cancer potency factor from Table 7.1

AERSCREEN 16216 / A ERMOD 18081 10/9/2020
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TITLE: 2675Geary_TR U

********** VOLUME P ARAMETERS *****

SOURCE EMISSION RAT E: 1.000 0 g/s 7.937 lb/hr
VOLUME HEIGHT: 5 0 meters 16.40 feet
INITIAL LATERAL DIM ENSION: 1.9 6 meters 6.43 feet
INITIAL VERTICAL DI MENSION: 1.4 0 meters 4.59 feet
RURAL OR URBAN: URBA N
POPULATION: 433539 1

FLAGPOLE RECEPTOR H EIGHT: 1.8 0 meters 5.91 feet

INITIAL PROBE DISTA NCE = 5000 . meters 16404. feet

**** BUILDING DOWN WASH PARAMETERS

BUIL DING DOWNWASH NOT U SED FOR NON-POIN T SOURCES

******* PROBE ANAL YSIS **********
---

25 meter receptor spa cing: 5. meters - 5000. meters

Zo ROUGH SECTOR LEN	NESS 1-HR CON GTH (ug/m3)	C DIST TE (m) P	MPORAL ERIOD
1* 1.	000 0.1240E+	05 5.2	SPR

* = worst case flow sector

*** MAKEMET METEOR OLOGY PARAMETERS

MIN/MAX TEMPERATURE : 250.0 / 310.0 (K)

MINIMUM WIND SPEED: 0.5 m/s

ANEMOMETER HEIGHT: 10.000 meters

SURFACE CHARACTERIS TICS INPUT: AERMET SEASONAL TABLES

DOMINANT SURFACE PR OFILE: Urban
DOMINANT CLIMATE TY PE: Average Mois ture
DOMINANT SEASON: Spring

ALBEDO: 0.14
BOWEN RATIO: 1
ROUGHNESS LENGTH: 1.000 (meters)

SURFACE FRICTION VE LOCITY (U*) ADJUSTE D

METEOROLOGY	CONDITIONS USED TO	PREDICT OVERALL	MAXIMUM IMPACT
YR MO DY JDY HR			
-- -- -- --- --			
10 01 30 30 12			
H0 U* W	* DT/DZ ZICNV ZIMC	H M-O LEN Z0	BOWEN ALBEDO REF WS
- - - - - - - - -	- - - - - - - - - -	- - - - - - - -	- - - - - - - - - - -
116.38 0.167 1.20	0 0.020 566. 158	. -3.8 1.000	1.00 0.14 0.50
HT REF TA	HT		
- - - - - - - - - -	-		
10.0 310.0 2		0	

METEOROLOGY	CONDITIONS USED TO	PREDICT AMBIENT	BOUNDARY IMPACT
YR MO DY JDY HR			
-- -- -- --- --			
10 01 30 30 12			
H0 U* W	* DT/DZ ZICNV ZIMC	H M-O LEN Z0	BOWEN ALBEDO REF WS
- - - - - - - - -	- - - - - - - - - -	- - - - - - - -	- - - - - - - - - - -
116.38 0.167 1.20	0 0.020 566. 158	. -3.8 1.000	1.00 0.14 0.50
HT REF TA	HT		

- - - - - - - - - - -

10.0 310.0 2 0

********** ***** AERSCREEN AUTOMATED DISTANCES **********

O VERALL MAXIMUM CONCENTRATIONS BY DISTANCE

DIST (m)	MAXIMUM 1-HR CONC (ug/m3)	DIST (m)	MAXIMUM 1-HR CONC (ug/m3)
5.21	1.24E+04	2525	0.6456
25	1500	2550	0.6336
50	433.2	2575	0.622
75	216	2600	0.6133
100	132	2625	0.6098
125	90.19	2650	0.6063
150	66.12	2675	0.6029
175	54.24	2700	0.5996
200	45.44	2725	0.5963
225	38.59	2750	0.593
250	33.2	2775	0.5898
275	28.89	2800	0.5866
300	25.39	2825	0.5835
325	22.49	2850	0.5804
350	20.06	2875	0.5773
375	18.01	2900	0.5743
400	16.27	2925	0.5713
425	14.77	2950	0.5683
450	13.47	2975	0.5654
475	12.34	3000	0.5627
500	11.35	3025	0.5599
525	10.47	3050	0.5573
550	9.692	3075	0.5546
575	8.998	3100	0.552
600	8.376	3125	0.5494
625	7.818	3150	0.5468
650	7.314	3175	0.5443
675	6.857	3200	0.5417
700	6.442	3225	0.5392
725	6.064	3250	0.5368
750	5.719	3275	0.5343
775	5.402	3300	0.5319

800	5.111	3325	0.5295
825	4.843	3350	0.5272
850	4.595	3375	0.5248
875	4.366	3400	0.5225
900	4.154	3425	0.5202
925	3.957	3450	0.5179
950	3.774	3475	0.5157
975	3.603	3500	0.5135
1000	3.443	3525	0.5113
1025	3.294	3550	0.5091
1050	3.154	3575	0.5069
1075	3.023	3600	0.5048
1100	2.9	3625	0.5027
1125	2.784	3650	0.5006
1150	2.675	3675	0.4985
1175	2.572	3700	0.4964
1200	2.475	3725	0.4943
1225	2.388	3750	0.4923
1250	2.306	3775	0.4903
1275	2.228	3800	0.4883
1300	2.154	3825	0.4863
1325	2.083	3850	0.4844
1350	2.016	3875	0.4824
1375	1.952	3900	0.4805
1400	1.891	3925	0.4786
1425	1.833	3950	0.4767
1450	1.778	3975	0.4748
1475	1.725	4000	0.4729
1500	1.674	4025	0.4711
1525	1.626	4050	0.4693
1550	1.58	4075	0.4674
1575	1.535	4100	0.4656
1600	1.493	4125	0.4638
1625	1.452	4150	0.4621
1650	1.413	4175	0.4603
1675	1.375	4200	0.4586
1700	1.339	4225	0.4568
1725	1.304	4250	0.4551
1750	1.271	4275	0.4534
1775	1.238	4300	0.4517
1800	1.207	4325	0.45
1825	1.178	4350	0.4484
1850	1.149	4375	0.4467
1875	1.121	4400	0.4451
1900	1.094	4425	0.4434
1925	1.069	4450	0.4418
1950	1.044	4475	0.4402

1975	1.02	4500	0.4386
2000	0.9964	4525	0.4371
2025	0.9739	4550	0.4355
2050	0.9522	4575	0.4339
2075	0.9312	4600	0.4324
2100	0.9108	4625	0.4309
2125	0.8911	4650	0.4294
2150	0.872	4675	0.4279
2175	0.8536	4700	0.4264
2200	0.8357	4725	0.4249
2225	0.8183	4750	0.4234
2250	0.8015	4775	0.4219
2275	0.7851	4800	0.4204
2300	0.7693	4825	0.4187
2325	0.7539	4850	0.4171
2350	0.739	4875	0.4155
2375	0.7244	4900	0.4139
2400	0.7104	4925	0.4123
2425	0.6967	4950	0.4108
2450	0.6833	4975	0.4092
2475	0.6704	5000	0.4077
2500	0.6578		

********** *** AERSCREEN MAXIMUM IMPACT SUMMARY **********

CALCULATION PROCEDURE	MAXIMUM 1-HOUR CONC (ug/m3)	SCALED 3-HOUR CONC (ug/m3)	SCALED 8-HOUR CONC (ug/m3)	SCALED 24-HOUR CONC (ug/m3)	SCALED ANNUAL CONC (ug/m3)
FLAT TERRAIN	0.1240E+05	0.1240E+05	0.1116E+05	7442.	1240.
DISTANCE FROM SOURCE	5.21 meters				
IMPACT AT THE AMBIENT BOUNDARY	0.1240E+05	0.1240E+05	0.1116E+05	7442.	1240.
DISTANCE FROM SOURCE	5.21 meters				

AERSCREEN 16216 / A ERMOD 18081 10/9/2020
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TITLE: 2675GEARY_TR U

********** ********* VOLUME P ARAMETERS **** **********

SOURCE EMISSION RAT E: 1.000 0 g/s 7.937 lb/hr
VOLUME HEIGHT: 5 0 meters 16.40 feet
INITIAL LATERAL DIM ENSION: 1.9 6 meters 6.43 feet
INITIAL VERTICAL DI MENSION: 1.4 0 meters 4.59 feet
RURAL OR URBAN: URBA N
POPULATION: 433539 1

FLAGPOLE RECEPTOR H EIGHT: 10.9 0 meters 35.76 feet

INITIAL PROBE DISTA NCE = 5000 . meters 16404. feet

********** **** BUILDING DOWN WASH PARAMETERS **********

BUIL DING DOWNWASH NOT U SED FOR NON-POI NT SOURCES

********** ******* PROBE ANAL YSIS ********* **********
25 meter receptor spa cing: 5. meters - 5000. meters

Zo ROUGH SECTOR LEN	NESS GTH (ug/m3)	C DIST T (m)	EMPORAL PERIOD
1* 1.	000 2591.	5.2	SUM

* = worst case flow sector

********** *** MAKEMET METEOR OLOGY PARAMETER S **********

MIN/MAX TEMPERATURE : 250.0 / 310.0 (K)

MINIMUM WIND SPEED: 0.5 m/s

ANEMOMETER HEIGHT: 10.000 meters

SURFACE CHARACTERIS TICS INPUT: AERMET SEASONAL TABLES

DOMINANT SURFACE PR OFILE: Urban
DOMINANT CLIMATE TY PE: Average Mois ture
DOMINANT SEASON: Summer

ALBEDO: 0.16
BOWEN RATIO: 2
ROUGHNESS LENGTH: 1.000 (meters)

SURFACE FRICTION VE LOCITY (U*) ADJUSTE D

METEOROLOGY	CONDITIONS USED TO	PREDICT OVERALL	MAXIMUM IMPACT
YR MO DY JDY HR			
-- -- -- --- --			
10 01 18 18 12			
H0 U* W	* DT/DZ ZICNV ZIMC	H M-O LEN Z	0 BOWEN ALBEDO REF WS
- - - - - - - - -	- - - - - - - - - -	- - - - - - -	- - - - - - - - - - - -
155.88 0.179 1.20	0 0.020 340. 174	. -2.8 1.00	0 2.00 0.16 0.50
HT REF TA	HT		
- - - - - - - - - -	-		
10.0 250.0 2	0		

METEOROLOGY	CONDITIONS USED TO	PREDICT AMBIENT	BOUNDARY IMPACT
YR MO DY JDY HR			
-- -- -- --- --			
10 01 18 18 12			
H0 U* W	* DT/DZ ZICNV ZIMC	H M-O LEN Z	0 BOWEN ALBEDO REF WS
- - - - - - - - -	- - - - - - - - - -	- - - - - - -	- - - - - - - - - - - -
155.88 0.179 1.20	0 0.020 340. 174	. -2.8 1.00	0 2.00 0.16 0.50
HT REF TA	HT		

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10.0 250.0 2 0

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********** ***** AERSCREEN AUT OMATED DISTANCE S **********

O VERALL MAXIMUM CONC ENTRATIONS BY D ISTANCE

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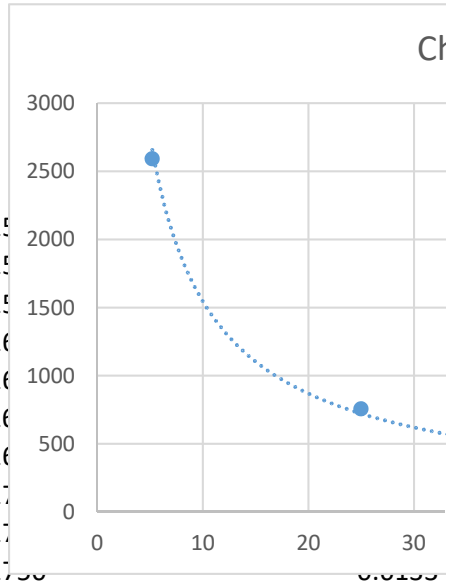
DIST (m)	MAXIMUM 1-HR CONC (ug/m3)	DIST (m)	
5.21	2591	25	
25	755.7	25	
50	422.7	25	
75	272.5	26	
100	185.4	26	
125	133	26	
150	99.69	26	
175	77.67	27	
200	62.25	27	
225	51.06	27	
250	42.69	2775	0.6098
275	36.29	2800	0.6064
300	31.26	2825	0.6031
325	27.23	2850	0.5998
350	23.94	2875	0.5965
375	21.23	2900	0.5933
400	18.96	2925	0.5901
425	17.05	2950	0.587
450	15.41	2975	0.5839
475	14	3000	0.5808
500	12.79	3025	0.5778
525	11.72	3050	0.5748
550	10.79	3075	0.5718
575	9.961	3100	0.5689
600	9.228	3125	0.5661
625	8.574	3150	0.5632
650	7.988	3175	0.5604
675	7.46	3200	0.5576
700	6.984	3225	0.5549
725	6.552	3250	0.5522
750	6.16	3275	0.5495
775	5.801	3300	0.5468

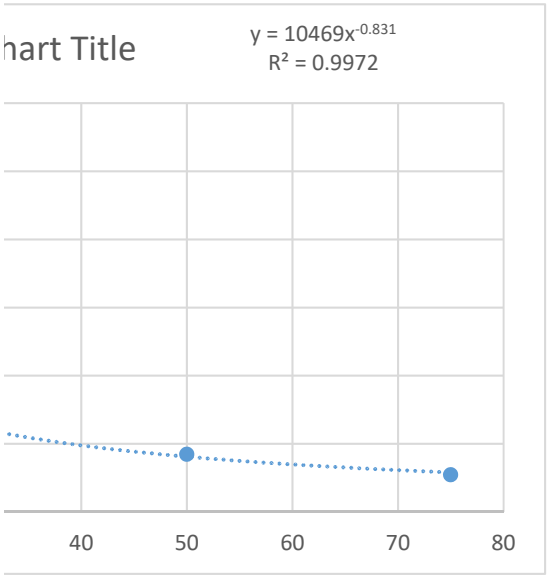


800	5.474	3325	0.5442
825	5.173	3350	0.5416
850	4.897	3375	0.5391
875	4.649	3400	0.5365
900	4.423	3425	0.534
925	4.213	3450	0.5316
950	4.018	3475	0.5291
975	3.837	3500	0.5267
1000	3.668	3525	0.5243
1025	3.51	3550	0.5219
1050	3.362	3575	0.5196
1075	3.223	3600	0.5173
1100	3.093	3625	0.515
1125	2.971	3650	0.5127
1150	2.856	3675	0.5104
1175	2.747	3700	0.5082
1200	2.645	3725	0.506
1225	2.549	3750	0.5038
1250	2.457	3775	0.5016
1275	2.371	3800	0.4995
1300	2.289	3825	0.4974
1325	2.211	3850	0.4952
1350	2.137	3875	0.4932
1375	2.067	3900	0.4911
1400	2	3925	0.489
1425	1.937	3950	0.487
1450	1.876	3975	0.485
1475	1.818	4000	0.483
1500	1.763	4025	0.481
1525	1.711	4050	0.4791
1550	1.66	4075	0.4771
1575	1.612	4100	0.4752
1600	1.566	4125	0.4733
1625	1.522	4150	0.4714
1650	1.48	4175	0.4695
1675	1.439	4200	0.4677
1700	1.4	4225	0.4658
1725	1.363	4250	0.464
1750	1.327	4275	0.4622
1775	1.292	4300	0.4604
1800	1.259	4325	0.4586
1825	1.227	4350	0.4569
1850	1.197	4375	0.4551
1875	1.167	4400	0.4534
1900	1.138	4425	0.4517
1925	1.111	4450	0.45
1950	1.084	4475	0.4483

1975	1.059	4500	0.4466
2000	1.034	4525	0.4449
2025	1.01	4550	0.4433
2050	0.9871	4575	0.4416
2075	0.9648	4600	0.44
2100	0.9433	4625	0.4384
2125	0.9224	4650	0.4368
2150	0.9022	4675	0.4352
2175	0.8827	4700	0.4337
2200	0.8638	4725	0.4321
2225	0.8455	4750	0.4306
2250	0.8277	4775	0.429
2275	0.8105	4800	0.4274
2300	0.7938	4825	0.4257
2325	0.7776	4850	0.4241
2350	0.7619	4875	0.4225
2375	0.7466	4900	0.4208
2400	0.7349	4925	0.4192
2425	0.7241	4950	0.4177
2450	0.7134	4975	0.4161
2475	0.7031	5000	0.4145
2500	0.693		

********** *** AERSCREEN MAXIMUM IMPACT SUMMARY **********

CALCULATION PROCEDURE	MAXIMUM 1-HOUR CONC (ug/m3)	SCALED 3-HOUR CONC (ug/m3)	SCALED 8-HOUR CONC (ug/m3)	SCALED 24-HOUR CONC (ug/m3)	SCALED ANNUAL CONC (ug/m3)
FLAT TERRAIN	2591.	2591.	2332	1555.	259.1
DISTANCE FROM SOURCE	5.21 meters				
IMPACT AT THE AMBIENT BOUNDARY	2591.	2591.	2332	1555.	259.1
DISTANCE FROM SOURCE	5.21 meters				


hart Title
y = 10469x-0.831
R² = 0.9972
40
50
60
70
80

AERSCREEN 16216 / A ERMOD 18081 10/9/2020
14:51:58

TITLE: 2675Geary_ID LE

********** AREA PARAMETERS *****

SOURCE EMISSION RAT E: 1.0000 g/s 7.937 lb/hr

AREA EMISSION RATE: 7.09E-03 g/(s-m2) 0.562E-01 lb/(hr-m2)
AREA HEIGHT: 2.55 meters 8.37 feet
AREA SOURCE LONG SI DE: 16.80 meters 55.12 feet
AREA SOURCE SHORT S IDE: 8.40 meters 27.56 feet
INITIAL VERTICAL DI MENSION: 2.37 meters 7.78 feet
RURAL OR URBAN: URBAN
POPULATION: 4335391

FLAGPOLE RECEPTOR H EIGHT: 1.80 meters 5.91 feet

INITIAL PROBE DISTA NCE = 5000. meters 16404. feet

**** BUILDING DOWNWASH PARAMETERS

BUIL DING DOWNWASH NOT US ED FOR NON-POIN T SOURCES

******* FLOW SECTOR ANALYSIS ****
---

25 meter receptor spac ing: 1. meters - 5000. meters

MAXIMUM IMPACT RECEPTOR

Zo SECTOR	SURFAC ROUGHN	E 1-HR CONC (ug/m3)	RADIA L (deg)	DIST (m)	TEMPO PERI	RAL OD
1*	1.00	0 0.1861E+05	25	1.0	SPR	

* = worst case diag onal

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******************* *** MAKEMET METEORO LOGY PARAMETERS *********************
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MIN/MAX TEMPERATURE : 250.0 / 310.0 (K)

MINIMUM WIND SPEED: 0.5 m/s

ANEMOMETER HEIGHT: 10.000 meters

SURFACE CHARACTERIS TICS INPUT: AERMET S EASONAL TABLES

DOMINANT SURFACE PR OFILE: Urban
DOMINANT CLIMATE TY PE: Average Moist ure
DOMINANT SEASON: Spring

ALBEDO: 0.14
BOWEN RATIO: 1
ROUGHNESS LENGTH: 1.000 (meters)

SURFACE FRICTION VE LOCITY (U*) ADJUSTED

METEOROLOGY CONDITIONS USED TO P REDICT OVERALL MAXIMUM IMPACT
------------ -------------------- --------------- --------------

YR MO DY JDY HR
-- -- -- --- --
10 01 14 14 12

H0 U* W * DT/DZ ZICNV ZIMCH M-O LEN Z0 BOWEN ALBEDO REF WS
- -
3.42 0.110 0.60 0 0.020 2172. 84. -33.7 1.000 1.00 0.14 0.50

HT REF TA HT
- - - - - - - - - - -
10.0 280.0 2 0

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******************* ***** AERSCREEN AUTO MATED DISTANCES *********************
O VERALL MAXIMUM CONCE NTRATIONS BY DI STANCE

DIST (m)	MAXIMUM 1-HR CONC (ug/m3)	DIST (m)	MAXIMUM 1-HR CONC (ug/m3)
1	1.86E+04	2525	5.487
25	3896	2550	5.414
50	1339	2575	5.342
75	736.3	2600	5.271
100	485.5	2625	5.203
125	352.8	2650	5.136
150	272.3	2675	5.07
175	219.3	2700	5.006
200	181.8	2725	4.943
225	154.1	2750	4.882
250	133	2775	4.822
275	116.5	2800	4.763
300	103.2	2825	4.705
325	92.31	2850	4.649
350	83.28	2875	4.593
375	75.68	2900	4.539
400	69.2	2925	4.486
425	63.62	2950	4.434
450	58.78	2975	4.383
475	54.55	2999.99	4.333
500	50.81	3025	4.284
525	47.5	3050	4.236
550	44.54	3075	4.189
575	41.89	3100	4.143
600	39.5	3125	4.098
625	37.34	3150	4.053
649.99	35.37	3174.99	4.01
675	33.58	3200	3.967
699.99	31.94	3225	3.925
725	30.43	3250	3.884
749.99	29.04	3275	3.843
775	27.76	3300	3.803
800	26.57	3325	3.764
825	25.47	3350	3.726
850	24.45	3375	3.688
875	23.49	3400	3.651
900	22.6	3425	3.614
924.99	21.76	3450	3.579
950	20.98	3475	3.543
975	20.24	3500	3.509

1000	19.55	3525	3.475
1025	18.9	3550	3.441
1050	18.28	3575	3.408
1075	17.7	3600	3.376
1100	17.15	3625	3.344
1125	16.63	3650	3.313
1149.99	16.13	3675	3.282
1175	15.66	3700	3.252
1200	15.22	3724.99	3.222
1225	14.79	3750	3.193
1250	14.39	3775	3.164
1275	14	3800	3.135
1300	13.63	3825	3.107
1325	13.28	3850	3.08
1350	12.95	3875	3.053
1375	12.62	3900	3.026
1400	12.32	3925	2.999
1425	12.02	3950	2.973
1450	11.74	3975	2.948
1475	11.46	4000	2.923
1500	11.2	4025	2.898
1525	10.95	4050	2.873
1550	10.71	4075	2.849
1575	10.48	4100	2.826
1600	10.25	4125	2.802
1625	10.04	4149.99	2.779
1650	9.831	4175	2.756
1675	9.63	4200	2.734
1700	9.437	4225	2.712
1725	9.25	4250	2.69
1750	9.069	4275	2.668
1775	8.894	4300	2.647
1800	8.725	4325	2.626
1824.99	8.562	4350	2.606
1850	8.404	4375	2.585
1875	8.25	4400	2.565
1899.99	8.102	4425	2.545
1924.99	7.958	4450	2.526
1950	7.819	4475	2.507
1975	7.683	4500	2.488
2000	7.552	4525	2.469
2025	7.424	4550	2.45
2050	7.301	4575	2.432
2075	7.18	4600	2.414
2100	7.063	4625	2.396
2124.99	6.95	4650	2.378
2150	6.839	4675	2.361

2175	6.732	4700	2.344
2200	6.627	4725	2.327
2224.99	6.525	4750	2.31
2250	6.426	4775	2.294
2275	6.33	4800	2.277
2300	6.236	4825	2.261
2325	6.144	4850	2.245
2350	6.054	4875	2.23
2375	5.967	4900	2.214
2400	5.882	4925	2.199
2425	5.799	4950	2.183
2449.99	5.719	4975	2.168
2475	5.64	5000	2.154
2500	5.562		

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********** *** AERSCREEN MAXIM UM IMPACT SUMMA RY **********
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3-hour, 8-hour, and 24-hour scaled
concentrations are equal to the 1-hour concentration a s referenced in
SCREENING PROCEDURE S FOR ESTIMATING THE AIR QUALITY
IMPACT OF STATIONAR Y SOURCES, REVISED (Section 4.5.4)
Report number EPA-4 54/R-92-019
http://www.epa.gov/ scram001/guidance_pe rmit.htm
under Screening Gui dance

CALCULATION PROCEDURE	MAXIMUM 1-HOUR CONC (ug/m3)	SCALED 3-HOU R CONC (ug/m3	D SCALED 8-HOUR CONC) (ug/m3)	SCALED 24-HOUR CONC (ug/m3)	SCALED ANNUAL CONC (ug/m3)
FLAT TERRAIN	0.2234E+05	0.2234E+	05 0.2234E+05	0.2234E+05	N/A
DISTANCE FROM SOURC	E 7.00 mete		rs		
IMPACT AT THE AMBIENT BOUNDARY	0.1861E+05	0.1861E+	05 0.1861E+05	0.1861E+05	N/A
DISTANCE FROM SOURC	E 1.00 mete		rs		

AERSCREEN 16216 / A ERMOD 18081 10/9/2020
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TITLE: 2675GEARY_ID LE

********** AREA PARAMETERS *****

SOURCE EMISSION RATE: 1.0000 g/s 7.937 lb/hr

AREA EMISSION RATE: 7.09E-03 g/(s-m2) 0.562E-01 lb/(hr-m2)
AREA HEIGHT: 2.55 meters 8.37 feet
AREA SOURCE LONG SIDE: 16.80 meters 55.12 feet
AREA SOURCE SHORT SIDE: 8.40 meters 27.56 feet
INITIAL VERTICAL DIMENSION: 2.37 meters 7.78 feet
RURAL OR URBAN: URBAN
POPULATION: 4335391

FLAGPOLE RECEPTOR HEIGHT: 10.90 meters 35.76 feet

INITIAL PROBE DISTANCE = 5000. meters 16404. feet

**** BUILDING DOWNWASH PARAMETERS ****

BUILDING DOWNWASH NOT USED FOR NON-POINT SOURCES

******* FLOW SECTOR ANALYSIS ****

25 meter receptor spacing: 1. meters - 5000. meters

MAXIMUM IMPACT RECEPTOR

SECTOR	Zo SURFACE ROUGHN	E 1-HR CONC (ug/m3)	RADIAL DIST (m)	TEMPO PERIOD
1*	1.00	0 2283.	5 25.0	WIN

* = worst case diag onal

*** MAKEMET METEORO LOGY PARAMETERS ***

MIN/MAX TEMPERATURE : 250.0 / 310.0 (K)

MINIMUM WIND SPEED: 0.5 m/s

ANEMOMETER HEIGHT: 10.000 meters

SURFACE CHARACTERIS TICS INPUT: AERMET S EASONAL TABLES

DOMINANT SURFACE PR OFILE: Urban
DOMINANT CLIMATE TY PE: Average Moist ure
DOMINANT SEASON: Winter

ALBEDO: 0.35
BOWEN RATIO: 1.5
ROUGHNESS LENGTH: 1.000 (meters)

SURFACE FRICTION VE LOCITY (U*) ADJUSTED

METEOROLOGY CONDITIONS USED TO P REDICT OVERALL MAXIMUM IMPACT

YR MO DY JDY HR
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10 01 01 1 01

H0	U*	W	*	DT/DZ	ZICNV	ZIMCH	M-O LEN	Z0	BOWEN	ALBEDO	REF WS
-5.51	0.111	-9.00	0	0.020	-999.	85.	19.2	1.000	1.50	0.35	0.50

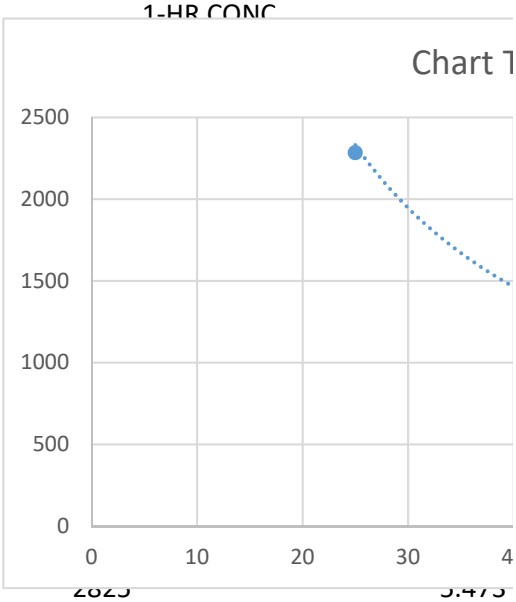
HT	REF TA	HT
10.0	250.0	2

0

***** AERSCREEN AUTO MATED DISTANCES *****

O VERALL MAXIMUM CONCE NTRATIONS BY DI STANCE

DIST (m)	MAXIMUM 1-HR CONC (ug/m3)	DIST (m)	MAXIMUM 1-HR CONC
1	963.5		
25	2283		
50	1241		
75	758.5		
100	521.9		
125	387.7		
150	303.3		
175	246.4		
200	205.5		
225	175		
250	151.6		
275	133.1		
300	118.1		
325	105.9	2850	5.408
350	95.66	2875	5.344
375	87.04	2900	5.281
400	79.67	2925	5.219
425	73.32	2950	5.159
450	67.79	2975	5.099
475	62.95	3000	5.041
500	58.68	3025	4.984
525	54.88	3050	4.929
550	51.49	3074.99	4.874
575	48.45	3100	4.82
600	45.7	3125	4.767
625	43.21	3150	4.716
649.99	40.95	3174.99	4.665
675	38.89	3200	4.615
699.99	36.99	3225	4.566
725	35.26	3250	4.518
749.99	33.66	3275	4.471
775	32.18	3300	4.425
800	30.81	3325	4.379
825	29.53	3350	4.335
850	28.35	3375	4.291
875	27.25	3400	4.248
900	26.21	3425	4.205
924.99	25.25	3450	4.164
950	24.34	3475	4.123
975	23.49	3500	4.083



1000	22.69	3525	4.043
1025	21.94	3550	4.004
1050	21.22	3575	3.966
1075	20.55	3600	3.928
1100	19.91	3625	3.891
1125	19.31	3650	3.855
1150	18.74	3675	3.819
1175	18.19	3700	3.784
1200	17.67	3725	3.749
1225	17.18	3750	3.715
1250	16.71	3775	3.681
1275	16.27	3800	3.648
1300	15.84	3825	3.616
1325	15.43	3849.99	3.584
1350	15.04	3875	3.552
1375	14.67	3900	3.521
1400	14.31	3925	3.49
1425	13.97	3950	3.46
1450	13.64	3975	3.43
1475	13.32	4000	3.401
1500	13.02	4025	3.372
1525	12.73	4050	3.344
1550	12.45	4075	3.316
1575	12.18	4100	3.288
1600	11.92	4125	3.261
1625	11.67	4150	3.234
1650	11.43	4175	3.208
1675	11.19	4200	3.181
1700	10.97	4225	3.156
1725	10.75	4250	3.13
1750	10.54	4275	3.105
1775	10.34	4300	3.081
1800	10.14	4325	3.056
1824.99	9.954	4350	3.032
1850	9.77	4375	3.009
1875	9.592	4400	2.985
1900	9.42	4425	2.962
1924.99	9.253	4449.99	2.94
1950	9.091	4475	2.917
1975	8.934	4500	2.895
2000	8.781	4525	2.873
2025	8.633	4550	2.852
2050	8.489	4575	2.83
2075	8.349	4600	2.809
2100	8.214	4625	2.788
2124.99	8.082	4650	2.768
2150	7.953	4675	2.748

2175	7.828	4700	2.728
2200	7.707	4725	2.708
2224.99	7.589	4750	2.689
2250	7.473	4775	2.669
2275	7.361	4800	2.65
2300	7.252	4825	2.632
2325	7.145	4850	2.613
2350	7.042	4875	2.595
2375	6.94	4900	2.577
2400	6.842	4924.99	2.559
2425	6.745	4950	2.541
2449.99	6.651	4975	2.524
2475	6.559	5000	2.506
2500	6.47		

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********** *** AERSCREEN MAXIM UM IMPACT SUMMA RY **********
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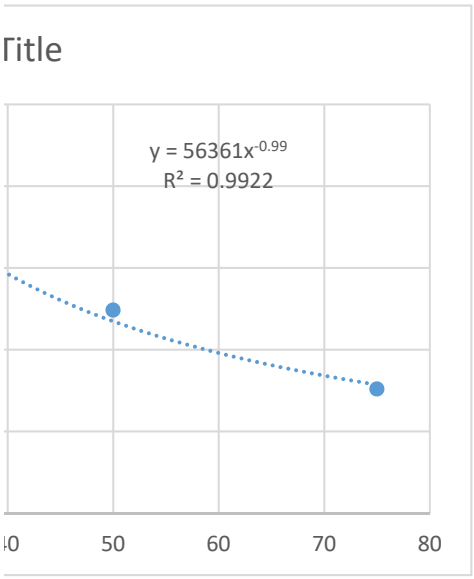
3-hour, 8-hour, and 24-hour scaled
concentrations are equal to the 1-hour concentration a s referenced in
SCREENING PROCEDURE S FOR ESTIMATING THE AIR QUALITY
IMPACT OF STATIONAR Y SOURCES, REVISED (Section 4.5.4)
Report number EPA-4 54/R-92-019
http://www.epa.gov/ scram001/guidance_pe rmit.htm
under Screening Gui dance

CALCULATION PROCEDURE	MAXIMUM 1-HOUR CONC (ug/m3)	SCALE 3-HOU CONC (ug/m3	D SCALED R 8-HOUR CONC) (ug/m3)	SCALED 24-HOUR CONC (ug/m3)	SCALED ANNUAL CONC (ug/m3)
FLAT TERRAIN	2471.	2471.	2471	2471.	N/A

DISTANCE FROM SOURC E 18.00 mete rs

IMPACT AT THE
AMBIENT BOUNDARY 963.5 963.5 963.5 963.5 N/A

DISTANCE FROM SOURC E 1.00 mete rs


Title
y = 56361x-0.99
R² = 0.9922
50
60
70
80

OFFROAD2017 (v1.0.1) Emissions Inventory
Region Type: County
Region: San Francisco
Calendar Year: 2020
Scenario: All Adopted Rules - Exhaust
Vehicle Classification: OFFROAD2017 Equipment Types
Units: Emissions: tons/day, Fuel Consumption: gallons/year, Activity: hours/year, HP-Hours: HP-hours/year

			3			7				11				14		16							
Region	CalYr	VehClass	MdlYr	HP_Bin	Fuel	HC_tpd	ROG_tpd	ROG_tphr	TOG_tpd	CO_tpd	NOx_tpd	NOx_tphr	CO2_tpd	PM10_tpd	PM10_tphr	PM2_5_tp	PM2_5_tphr	PM_tpd	SOx_tpd	NH3_tpd	Fuel_gpy	Total_Acti	Total_Popu	Horsepower_Hours_H
San Franci	2020	TRU - Instate Trailer TRU	Aggregate	Aggregate	Diesel	0.010546	0.012761	6.58E-06	0.015186	0.163465	0.116964	6.03538E-05	2.783133	0.002244288	1.15806E-06	0.002065	1.06542E-06	0.002244	2.56E-05	2.29E-05	1766.632	707359.3	533.9032	24050216
San Franci	2020	TRU - Instate Truck TRU	Aggregate	Aggregate	Diesel	0.001618	0.001957	3.75E-06	0.002329	0.015768	0.018996	3.64248E-05	0.378104	0.000788641	1.51225E-06	0.000726	1.39127E-06	0.000789	3.47E-06	3.11E-06	240.0068	190347.5	139.8585	2683900
San Franci	2020	TRU - Instate Van TRU	Aggregate	Aggregate	Diesel	3.74E-05	4.53E-05	2.4E-06	5.39E-05	0.000365	0.00044	2.32499E-05	0.008753	1.82576E-05	9.65269E-07	1.68E-05	8.88047E-07	1.83E-05	8.03E-08	7.19E-08	5.556325	6903.795	5.07259	62134.15

EMFAC2017 (v1.0.2) Emission Rates
Region Type: County
Region: SAN FRANCISCO
Calendar Year: 2020
Season: Annual
Vehicle Classification: EMFAC2007 Categories
Units: miles/day for VMT, trips/day for Trips, g/mile for RUNEX, PMBW and PMTW, g/trip for STREX, HTSK and RUNLS, g/vehicle/day for IDLEX, RESTL and DIURN. Note 'day' in the unit is operation day.

Region	Calendar Y	Vehicle Ca	Model Yea	Speed	Fuel	Population	VMT	Trips	NOx_RUNI	NOx_IDLE	NOx_STRE	PM2.5_RU	PM2.5_IDI	PM2.5_STI	PM2.5_PM	PM2.5_PM	PM10_RUI	PM10_IDL	PM10_STR	PM10_PM	PM10_PM	CO2_RUNI	CO2_IDLE	CO2_STRE	CH4_RUNI	CH4_IDLE	CH4_STRE	N2O_RUN	N2O_IDLE
SAN FRAN	2020	HHDT	Aggregate	Aggregate	GAS	2.341795	100.663	46.85463	5.35743	0	0.004716	0.00397	0	0.002728	0.005	0.02646	0.004278	0	0.002917	0.02	0.06174	2155.252	0	54.28246	0.289865	0	0.000205	0.177157	0
SAN FRAN	2020	HHDT	Aggregate	Aggregate	DSL	1098.449	72631.29	7439.643	6.251003	47.14749	1.915081	0.066853	0.087061	0	0.008695	0.025563	0.069876	0.090997	0	0.034779	0.059646	1912.39	6579.307	0	0.007945	0.115035	0	0.300601	1.034175
SAN FRAN	2020	HHDT	Aggregate	Aggregate	NG	184.2297	7509.575	718.4957	1.996619	21.82677	0	0.005408	0.035222	0	0.009	0.02646	0.005652	0.036814	0	0.036	0.06174	3267.469	4191.076	0	3.591403	1.265814	0	0.666095	0.854378
SAN FRAN	2020	LDA	Aggregate	Aggregate	GAS	154152.6	5467924	725648.7	0.04897	0	0.22758	0.001883	0	0.001939	0.002	0.01575	0.002047	0	0.002109	0.008	0.03675	289.8991	0	58.40852	0.003516	0	0.062957	0.005173	0
SAN FRAN	2020	LDA	Aggregate	Aggregate	DSL	2101.971	75322.76	9846.793	0.100086	0	0	0.010255	0	0	0.002	0.01575	0.010719	0	0	0.008	0.03675	238.5161	0	0	0.001242	0	0	0.037491	0
SAN FRAN	2020	LDA	Aggregate	Aggregate	ELEC	3065.99	113171.3	15244.85	0	0	0	0	0	0	0.002	0.01575	0	0	0	0.008	0.03675	0	0	0	0	0	0	0
SAN FRAN	2020	LDT1	Aggregate	Aggregate	GAS	16288.66	515340.3	75809.29	0.092552	0	0.276163	0.002281	0	0.002333	0.002	0.01575	0.002481	0	0.002537	0.008	0.03675	337.1396	0	67.46553	0.005912	0	0.075469	0.007464	0
SAN FRAN	2020	LDT1	Aggregate	Aggregate	DSL	14.64641	224.3495	51.15558	1.169868	0	0	0.151686	0	0	0.002	0.01575	0.158545	0	0	0.008	0.03675	490.0575	0	0	0.009468	0	0	0.07703	0
SAN FRAN	2020	LDT1	Aggregate	Aggregate	ELEC	63.65358	2216.437	309.2513	0	0	0	0	0	0	0.002	0.01575	0	0	0	0.008	0.03675	0	0	0	0	0	0	0
SAN FRAN	2020	LDT2	Aggregate	Aggregate	GAS	50748.26	1636761	238848.8	0.083249	0	0.33116	0.001826	0	0.001797	0.002	0.01575	0.001986	0	0.001955	0.008	0.03675	368.4682	0	74.58179	0.00463	0	0.076935	0.006952	0
SAN FRAN	2020	LDT2	Aggregate	Aggregate	DSL	487.4311	17779.9	2391.905	0.046237	0	0	0.005188	0	0	0.002	0.01575	0.005422	0	0	0.008	0.03675	332.6187	0	0	0.001148	0	0	0.052283	0
SAN FRAN	2020	LDT2	Aggregate	Aggregate	ELEC	354.042	11339.37	1783.362	0	0	0	0	0	0	0.002	0.01575	0	0	0	0.008	0.03675	0	0	0	0	0	0	0
SAN FRAN	2020	LHDT1	Aggregate	Aggregate	GAS	4186.639	155355.8	62374.68	0.216832	0.040433	0.54638	0.001923	0	0.000341	0.002	0.03276	0.002091	0	0.000371	0.008	0.07644	1026.076	122.6115	19.23183	0.00992	0.129828	0.024704	0.013674	0.003371
SAN FRAN	2020	LHDT1	Aggregate	Aggregate	DSL	1628.356	71847.02	20482.67	1.211211	2.117356	0	0.01803	0.026839	0	0.003	0.03276	0.018846	0.028053	0	0.012	0.07644	549.5243	133.4182	0	0.006581	0.005098	0	0.086378	0.020971
SAN FRAN	2020	LHDT2	Aggregate	Aggregate	GAS	497.9455	18078	7418.646	0.269206	0.040038	0.537515	0.001966	0	0.000328	0.002	0.03822	0.002138	0	0.000357	0.008	0.08918	1171.472	141.0942	21.98255	0.009965	0.127723	0.024755	0.016847	0.003205
SAN FRAN	2020	LHDT2	Aggregate	Aggregate	DSL	718.1352	29821.92	9033.237	1.081743	2.190029	0	0.01948	0.027515	0	0.003	0.03822	0.020361	0.028759	0	0.012	0.08918	623.4598	215.9546	0	0.006487	0.005098	0	0.097999	0.033945
SAN FRAN	2020	MCY	Aggregate	Aggregate	GAS	10823.04	78582.96	21646.08	1.191595	0	0.275185	0.002064	0	0.003408	0.001	0.00504	0.0022	0	0.0036	0.004	0.01176	230.2056	0	62.7648	0.410684	0	0.259148	0.067896	0
SAN FRAN	2020	MDV	Aggregate	Aggregate	GAS	24834.11	885169.8	117269.6	0.094444	0	0.359118	0.001996	0	0.002064	0.002	0.01575	0.00217	0	0.002244	0.008	0.03675	434.8919	0	88.34572	0.005499	0	0.086424	0.007653	0
SAN FRAN	2020	MDV	Aggregate	Aggregate	DSL	731.5711	29006.88	3585.321	0.054889	0	0	0.005433	0	0	0.002	0.01575	0.005678	0	0	0.008	0.03675	422.0817	0	0	0.000939	0	0	0.066345	0
SAN FRAN	2020	MDV	Aggregate	Aggregate	ELEC	82.30944	2772.002	421.1271	0	0	0	0	0	0	0.002	0.01575	0	0	0	0.008	0.03675	0	0	0	0	0	0	0
SAN FRAN	2020	MH	Aggregate	Aggregate	GAS	288.7683	3173.12	28.88838	0.518241	0	0.32717	0.002122	0	0.000604	0.003	0.05586	0.002303	0	0.000653	0.012	0.13034	1763.607	0	27.53441	0.023329	0	0.03601	0.029083	0
SAN FRAN	2020	MH	Aggregate	Aggregate	DSL	98.55014	1165.893	9.855014	3.466472	0	0	0.065681	0	0	0.004	0.05586	0.068651	0	0	0.016	0.13034	1024.342	0	0	0.004263	0	0	0.161012	0
SAN FRAN	2020	MHDT	Aggregate	Aggregate	GAS	522.8544	25723	10461.27	0.607787	0.088026	0.400057	0.001134	0	0.000468	0.003	0.05586	0.001234	0	0.000509	0.012	0.13034	1818.557	553.6033	40.47051	0.019485	0.256752	0.041757	0.028738	0.007099
SAN FRAN	2020	MHDT	Aggregate	Aggregate	DSL	3805.592	200119.1	34168.84	3.237834	12.16008	1.361954	0.084067	0.031355	0	0.003	0.05586	0.087868	0.032772	0	0.012	0.13034	1085.588	1286.219	0	0.009832	0.007442	0	0.170639	0.202176
SAN FRAN	2020	OBUS	Aggregate	Aggregate	GAS	232.9778	11850.8	4661.421	0.478426	0.064953	0.307467	0.000775	0	0.000222	0.003	0.05586	0.000843	0	0.000241	0.012	0.13034	1836.186	387.0762	26.98604	0.015278	0.200937	0.031261	0.024133	0.005695
SAN FRAN	2020	OBUS	Aggregate	Aggregate	DSL	395.3426	25545.68	3614.275	4.229605	16.13343	1.400447	0.091034	0.070199	0	0.003	0.05586	0.09515	0.073374	0	0.012	0.13034	1268.767	1931.45	0	0.011982	0.038324	0	0.199432	0.303597
SAN FRAN	2020	SBUS	Aggregate	Aggregate	GAS	118.176	5787.286	472.7039	0.183805	0.925829	0.552412	0.001165	0	0.00051	0.002	0.3192	0.001267	0	0.000555	0.008	0.7448	867.7976	2593.426	46.48619	0.004519	2.490925	0.049945	0.014829	0.093227
SAN FRAN	2020	SBUS	Aggregate	Aggregate	DSL	107.3357	3522.508	1238.639	4.003263	36.47929	1.197189	0.024388	0.030471	0	0.003	0.3192	0.02549	0.031849	0	0.012	0.7448	1091.406	3629.976	0	0.002916	0.013398	0	0.171554	0.570582
SAN FRAN	2020	UBUS	Aggregate	Aggregate	DSL	582.787	53666.7	2331.148	1.64416	0	0	0.006444	0	0	0.008597	0.028433	0.006736	0	0	0.034389	0.066344	1698.815	0	0	0.123257	0	0	0.26703	0
SAN FRAN	2020	UBUS	Aggregate	Aggregate	NG	122.7479	10595.94	490.9915	0.505656	0	0	0.003281	0	0	0.008941	0.026751	0.003429	0	0	0.035763	0.062419	2073.332	0	0	6.688255	0	0	0.422662	0

																					g/day
N2O_STRE	ROG_RUN	ROG_IDLE	ROG_STRE	ROG_HOT	ROG_RUN	ROG_REST	ROG_DIUR	TOG_RUN	TOG_IDLE	TOG_STRE	TOG_HOT	TOG_RUN	TOG_REST	TOG_DIUR	CO_RUNE	CO_IDLEX	CO_STREX	SOx_RUNE	SOx_IDLEX	SOx_STRE	PM IDLE
0.00023	1.882537	0	0.001074	0.425272	2.95389	0.080031	0.11934	2.606498	0	0.001176	0.425272	2.95389	0.080031	0.11934	77.7163	0	1.62094	0.021328	0	0.000537	0
0	0.171051	2.476675	0	0	0	0	0	0.194729	2.819506	0	0	0	0	0	0.584933	27.52697	0	0.018067	0.062158	0	8.28E-05
0	0.175371	0.048948	0	0	0	0	0	3.806639	1.327019	0	0	0	0	0	10.65946	20.42301	0	0	0	0	0.0002
0.0283	0.01422	0	0.300974	0.116727	0.24672	0.207499	0.213739	0.020733	0	0.329525	0.116727	0.24672	0.207499	0.213739	0.774579	0	2.507219	0.002869	0	0.000578	0
0	0.026744	0	0	0	0	0	0	0.030447	0	0	0	0	0	0	0.380532	0	0	0.002255	0	0	0
0	0	0	0	0.004888	0	0.00333	0.011937	0	0	0	0.004888	0	0.00333	0.011937	0	0	0	0	0	0	0
0.030078	0.025941	0	0.38276	0.167594	0.611731	0.313642	0.341872	0.037822	0	0.41907	0.167594	0.611731	0.313642	0.341872	1.15299	0	2.622115	0.003336	0	0.000668	0
0	0.20383	0	0	0	0	0	0	0.232047	0	0	0	0	0	0	1.222394	0	0	0.004633	0	0	0
0	0	0	0	0.004888	0	0.00333	0.011937	0	0	0	0.004888	0	0.00333	0.011937	0	0	0	0	0	0	0
0.035155	0.018967	0	0.369308	0.119328	0.407242	0.254193	0.239605	0.027666	0	0.404345	0.119328	0.407242	0.254193	0.239605	0.956381	0	3.075072	0.003646	0	0.000738	0
0	0.02471	0	0	0	0	0	0	0.028131	0	0	0	0	0	0	0.223751	0	0	0.003144	0	0	0
0	0	0	0	0.004888	0	0.00333	0.011937	0	0	0	0.004888	0	0.00333	0.011937	0	0	0	0	0	0	0
0.043852	0.047066	0.463404	0.122445	0.096771	0.679474	0.020206	0.033155	0.068678	0.676199	0.134061	0.096771	0.679474	0.020206	0.033155	0.85391	3.756245	1.735576	0.010154	0.001213	0.00019	0
0	0.141695	0.10976	0	0	0	0	0	0.16131	0.124954	0	0	0	0	0	0.556604	0.909745	0	0.005195	0.001261	0	1.72E-05
0.041847	0.045188	0.458659	0.123693	0.110561	0.825969	0.021391	0.03686	0.065938	0.669275	0.135428	0.110561	0.825969	0.021391	0.03686	0.816314	3.749706	1.847892	0.011593	0.001396	0.000218	0
0	0.13967	0.10976	0	0	0	0	0	0.159006	0.124954	0	0	0	0	0	0.565174	0.909745	0	0.005894	0.002042	0	4E-05
0.015496	2.893482	0	2.034471	0.794208	2.649795	0.997874	1.541655	3.540583	0	2.213026	0.794208	2.649795	0.997874	1.541655	21.96788	0	8.976303	0.002278	0	0.000621	0
0.036402	0.024129	0	0.429047	0.117576	0.391572	0.267924	0.252457	0.034315	0	0.469707	0.117576	0.391572	0.267924	0.252457	1.03267	0	3.406737	0.004304	0	0.000874	0
0	0.020214	0	0	0	0	0	0	0.023013	0	0	0	0	0	0	0.346252	0	0	0.00399	0	0	0
0	0	0	0	0.004888	0	0.00333	0.011937	0	0	0	0.004888	0	0.00333	0.011937	0	0	0	0	0	0	0
0.032972	0.117732	0	0.172214	0.108206	3.151509	0.042469	0.108274	0.164972	0	0.188313	0.108206	3.151509	0.042469	0.108274	3.279972	0	3.474869	0.017452	0	0.000272	0
0	0.091785	0	0	0	0	0	0	0.104491	0	0	0	0	0	0	0.310874	0	0	0.009684	0	0	0
0.029495	0.097625	1.00569	0.22923	0.094685	0.559995	0.023164	0.039203	0.142454	1.467501	0.250978	0.094685	0.559995	0.023164	0.039203	2.262175	15.03564	4.978529	0.017996	0.005478	0.0004	0
0	0.211678	0.160218	0	0	0	0	0	0.240979	0.182396	0	0	0	0	0	0.583818	3.42698	0	0.010256	0.012152	0	8.61E-06
0.025767	0.074783	0.744582	0.163043	0.026214	0.262238	0.017226	0.034453	0.109123	1.086492	0.178512	0.026214	0.262238	0.017226	0.034453	1.729866	5.764615	3.295329	0.018171	0.00383	0.000267	0
0	0.257979	0.825099	0	0	0	0	0	0.293689	0.939312	0	0	0	0	0	0.738929	8.460289	0	0.011987	0.018247	0	0.000186
0.05544	0.020712	10.63127	0.275495	0.022696	0.17345	0.004669	0.00994	0.030223	15.51313	0.301633	0.022696	0.17345	0.004669	0.00994	0.385289	82.17866	7.271806	0.008588	0.025664	0.00046	0
0	0.062776	0.288463	0	0	0	0	0	0.071466	0.328393	0	0	0	0	0	0.195791	7.57035	0	0.010311	0.034294	0	0.000297
0	0.001761	0	0	0	0	0	0	0.125792	0	0	0	0	0	0	0.204377	0	0	0.01606	0	0	0
0	0.095562	0	0	0	0	0	0	6.825854	0	0	0	0	0	0	52.15643	0	0	0	0	0	0

Sum of Population	Column Labels				
Row Labels	DSL	ELEC	GAS	NG	Grand Total
HHDT	85.48%	0.00%	0.18%	14.34%	100.00%
LDA	1.32%	1.92%	96.76%	0.00%	100.00%
LDT1	0.09%	0.39%	99.52%	0.00%	100.00%
LDT2	0.94%	0.69%	98.37%	0.00%	100.00%
LHDT1	28.00%	0.00%	72.00%	0.00%	100.00%
LHDT2	59.05%	0.00%	40.95%	0.00%	100.00%
MCY	0.00%	0.00%	100.00%	0.00%	100.00%
MDV	2.85%	0.32%	96.83%	0.00%	100.00%
MH	25.44%	0.00%	74.56%	0.00%	100.00%
MHDT	87.92%	0.00%	12.08%	0.00%	100.00%
OBUS	62.92%	0.00%	37.08%	0.00%	100.00%
SBUS	47.60%	0.00%	52.40%	0.00%	100.00%
UBUS	82.60%	0.00%	0.00%	17.40%	100.00%
Grand Total	**4.23%**	**1.28%**	**94.38%**	**0.11%**	**100.00%**

process	IDLEX
pollutant	PM10

Average of emission_rate	Column Labels						
Row Labels	**HHDT**	**LHDT1**	**LHDT2**	**MHDT**	**OBUS**	**SBUS**	**Grand Total**
Dsl	0.063227536	0.810989039	0.831392791	0.170483577	0.254874784	0.060114299	0.365180337
NG	0.058127564						0.058127564
Grand Total	**0.06067755**	**0.810989039**	**0.831392791**	**0.170483577**	**0.254874784**	**0.060114299**	**0.321315656**

process	IDLEX
pollutant	PM2_5

Average of emission_rate	Column Labels						
Row Labels	**HHDT**	**LHDT1**	**LHDT2**	**MHDT**	**OBUS**	**SBUS**	**Grand Total**
Dsl	0.06049234	0.775906012	0.795427107	0.163108533	0.243849013	0.057513781	0.349382798
NG	0.055612992						0.055612992
Grand Total	**0.058052666**	**0.775906012**	**0.795427107**	**0.163108533**	**0.243849013**	**0.057513781**	**0.307415683**

process	IDLEX
pollutant	NOx

Average of emission_rate	Column Labels						
Row Labels	**HHDT**	**LHDT1**	**LHDT2**	**MHDT**	**OBUS**	**SBUS**	**Grand Total**
Dsl	46.16687564	61.21105539	63.31199259	63.25737314	56.04201352	68.85481747	59.80735462
Gas		1.659820375	1.64358466	2.35583483	1.738332865	1.74750659	1.829015864
NG	34.46330989						34.46330989
Grand Total	**40.31509276**	**31.43543788**	**32.47778862**	**32.80660399**	**28.89017319**	**35.30116203**	**33.53770975**

process	IDLEX
pollutant	ROG

Average of emission_rate	Column Labels						
Row Labels	**HHDT**	**LHDT1**	**LHDT2**	**MHDT**	**OBUS**	**SBUS**	**Grand Total**
Dsl	2.323945002	3.17306498	3.17306498	0.833462239	2.866111867	0.544474505	2.152353929
Gas		19.0231953	18.82841098	26.91515052	19.92714105	20.06657014	20.9520936
NG	0.077286593						0.077286593
Grand Total	**1.200615798**	**11.09813014**	**11.00073798**	**13.87430638**	**11.39662646**	**10.30552232**	**9.812656514**

Exhibit E

SAN FRANCISCO PLANNING DEPARTMENT

AFFIDAVIT FOR FIRST SOURCE HIRING PROGRAM

Administrative Code Chapter 83

1650 Mission Street, Suite 400 • San Francisco CA 94103-2479 • 415.558.6378 • http://www.sfplanning.org

Section 1: Project Information

PROJECT ADDRESS	BLOCK/LOT(S)
2675 Geary Boulevard	1094/001

BUILDING PERMIT APPLICATION NO.	CASE NO. (IF APPLICABLE)	MOTION NO. (IF APPLICABLE)
n/a	2019-004110	n/a

PROJECT SPONSOR	MAIN CONTACT	PHONE
Whole Foods Market, c/o RJR	Mark Loper, Reuben, Junius & Rose LLP	415-567-9000

ADDRESS
1 Bush Street, Suite 600

CITY, STATE, ZIP	EMAIL
SF CA 94014	mloper@reubenlaw.com

ESTIMATED RESIDENTIAL UNITS	ESTIMATED SQ FT COMMERCIAL SPACE	ESTIMATED HEIGHT/FLOORS	ESTIMATED CONSTRUCTION COST
0	Appx. 54,285 sf	n/a (new tenant)	$9.6 million

ANTICIPATED START DATE

Section 2: First Source Hiring Program Verification

CHECK ALL BOXES APPLICABLE TO THIS PROJECT

- ☐ Project is wholly Residential
- ☒ Project is wholly Commercial
- ☐ Project is Mixed Use

- ☐ A: The project consists of ten (10) or more residential units;
- ☒ B: The project consists of 25,000 square feet or more gross commercial floor area.
- ☐ C: Neither 1A nor 1B apply.

NOTES:

- If you checked **C**, this project is NOT subject to the First Source Hiring Program. Sign Section 4: Declaration of Sponsor of Project and submit to the Planning Department.
- If you checked **A or B**, your project IS subject to the First Source Hiring Program. Please complete the reverse of this document, sign, and submit to the Planning Department prior to any Planning Commission hearing. If principally permitted, Planning Department approval of the Site Permit is required for all projects subject to Administrative Code Chapter 83.
- For questions, please contact OEWD's CityBuild program at CityBuild@sfgov.org or (415) 701-4848. For more information about the First Source Hiring Program visit *www.workforcedevelopmentsf.org*
- If the project is subject to the First Source Hiring Program, you are required to execute a Memorandum of Understanding (MOU) with OEWD's CityBuild program prior to receiving construction permits from Department of Building Inspection.

Continued...

Section 3: First Source Hiring Program – Workforce Projection

Per Section 83.11 of Administrative Code Chapter 83, it is the developer's responsibility to complete the following information to the best of their knowledge.

Provide the estimated number of employees from each construction trade to be used on the project, indicating how many are entry and/or apprentice level as well as the anticipated wage for these positions.

Check the anticipated trade(s) and provide accompanying information (Select all that apply):

TRADE/CRAFT	ANTICIPATED JOURNEYMAN WAGE	# APPRENTICE POSITIONS	# TOTAL POSITIONS
Abatement Laborer			
Boilermaker			
Bricklayer	$ 43.00	1	3
Carpenter	$ 52.50	3	15
Cement Mason	$ 34.00		3
Drywaller/ Latherer	$ 52.50	2	10
Electrician	$ 75.00	2-3	10
Elevator Constructor			
Floor Coverer	$ 52.00	2	6
Glazier	$ 52.50	1	4
Heat & Frost Insulator	$ 50 ?	-	2
Ironworker	$ 52.00	1	4
		TOTAL:	

TRADE/CRAFT	ANTICIPATED JOURNEYMAN WAGE	# APPRENTICE POSITIONS	# TOTAL POSITIONS
Laborer	$ 38.00	2	6
Operating Engineer			
Painter	$ 47.50	1	4
Pile Driver			
Plasterer			
Plumber and Pipefitter	$ 76.00	2	6
Roofer/Water proofer	$ 39.00	-	2
Sheet Metal Worker	$ 55.00	-	3
Sprinkler Fitter	$ 66.00	1	4
Taper	$ 52.00	1	5
Tile Layer/ Finisher	$ 48.00	1	4
Other:			
		TOTAL:	

	YES	NO
1. Will the anticipated employee compensation by trade be consistent with area Prevailing Wage?	☑	☐
2. Will the awarded contractor(s) participate in an apprenticeship program approved by the State of California's Department of Industrial Relations? TBD	☐	☐
3. Will hiring and retention goals for apprentices be established? TBD	☐	☐
4. What is the estimated number of local residents to be hired? TBD		

Section 4: Declaration of Sponsor of Principal Project

PRINT NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	EMAIL	PHONE NUMBER
Mark Loper, Agent, Reuben, Junius & Rose LLP	mloper@reubenlaw.com	415-567-9000

I HEREBY DECLARE THAT THE INFORMATION PROVIDED HEREIN IS ACCURATE TO THE BEST OF MY KNOWLEDGE AND THAT I COORDINATED WITH OEWD'S CITYBUILD PROGRAM TO SATISFY THE REQUIREMENTS OF ADMINISTRATIVE CODE CHAPTER 83.

M Gpr — May 15, 2020

(SIGNATURE OF AUTHORIZED REPRESENTATIVE) (DATE)

FOR PLANNING DEPARTMENT STAFF ONLY: PLEASE EMAIL AN ELECTRONIC COPY OF THE COMPLETED AFFIDAVIT FOR FIRST SOURCE HIRING PROGRAM TO OEWD'S CITYBUILD PROGRAM AT *CITYBUILD@SFGOV.ORG*

Cc: Office of Economic and Workforce Development, CityBuild
Address: 1 South Van Ness 5th Floor San Francisco, CA 94103 **Phone:** 415-701-4848
Website: *www.workforcedevelopmentsf.org* **Email:** *CityBuild@sfgov.org*

m | r | wolfe
& associates, p.c.
attorneys-at-law

November 6, 2020

By E-Mail

San Francisco Board of Supervisors
c/o Clerk of the Board
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
Board.of.Supervisors@sfgov.org
bos.legislation@sfgov.org

Re: File No. 201127 – Appeal of CEQA "Common Sense" Exemption Determination 2019-004110ENV – 2675 Geary Boulevard [Whole Foods Market]

Dear Members of the Board of Supervisors:

On behalf of San Francisco residents Julie Fisher and Tony Vargas, and United Food & Commercial Workers Union (UFCW) Local 5 and its members who live and/or work in San Francisco ("Appellants"), please accept and consider the following points in support of their appeal of the Planning Department's September 11, 2020 "common sense" CEQA exemption determination for a proposed Whole Foods Market at 2675 Geary Boulevard ("Project").

I. Summary

The Project is in an area that both the City and the Bay Area Air Quality Management District (BAAQMD) have designated an "Air Pollution Exposure Zone" (APEZ) pursuant to section 3809 of the San Francisco Health Code. This means that people in the residential neighborhood south and west of the site, including at-risk children at the Mt. St. Joseph-St. Elizabeth Epiphany Center and the Raoul Wallenberg Traditional High School, currently experience an elevated cancer risk from exposure to air pollutant emissions, in particular diesel particulate matter (DPM) from diesel exhaust. Health Code § 3809(d)(2). *See* maps, Attachment 1.

The Project is a full-service, Whole Foods supermarket that will generate numerous daily deliveries from diesel-powered heavy trucks, as well as substantial

customer vehicle traffic. The Project would therefore constitute a significant new source of DPM pollution emissions in a residential area that already suffers elevated health risk from such emissions. Based a screening level risk assessment performed by an air quality consultant retained by appellants, the Project's DPM emissions would exceed applicable BAAQMD significance thresholds for a project's individual and cumulative health risk impacts, *i.e.*, 10 and 100 excess cancers per 1 million population respectively. Substantial evidence therefore shows the Project will have significant individual and cumulative impacts on air quality and public health with respect to its neighbors.

For this reason, it simply cannot be seen "with certainty that there is no possibility that the activity in question may have a significant effect on the environment." The Project is therefore not exempt from CEQA under the "common sense" exemption, or indeed any other statutory or categorical exemption. The Board of Supervisors should uphold this appeal and direct Planning Department staff to prepare an initial study of the Project's potentially significant environmental impacts in accordance with CEQA, and mitigate any impacts the study might identify.

II. Procedural Background

On June 25, 2020 the Planning Commission granted Conditional Use Authorization for the Project, finding it categorically exempt from CEQA under the Class 32 Infill exemption, which exempts urban infill projects that are consistent with applicable general plan and zoning classifications, so long as there are no "significant effects relating to traffic, noise, air quality, or water quality." 14 C.C.R. § 15332(d). We appealed that action to the Board of Supervisors on July 16, pointing out that the Project site is within a designated APEZ, meaning that neighboring residents currently face lifetime excess cancer risks due to air pollution greater than 100 cases per million population." S.F. Health Code, § 3809(d)(2)(A). Because the Project would introduce a substantial amount of new vehicle emissions to the site relative to existing and past conditions, including diesel-powered heavy delivery trucks, the Project would exacerbate the existing excess cancer risk to nearby receptors.

Following our appeal, the Planning Department on September 2 rescinded its Infill exemption determination, determined the appeal moot, and issued a new environmental determination that the Project qualified for CEQA's "commons sense" exemption, which applies to projects "[w]here it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment." 14. C.C.R. § 15061(b)(3). The current appeal followed.

III. The Project would result in significant emissions of Toxic Air Contaminants, aggravating the existing health risks to nearby receptors in the designated Air Pollution Exposure Zone.

Toxic air contaminants (TACs) are airborne substances that are capable of causing short-term and/or long-term chronic or carcinogenic adverse human health effects. TACs include both organic and inorganic chemical substances. They may be emitted from a variety of common sources including gasoline stations, automobiles, dry cleaners, industrial operations, and painting operations. The current California list of TACs includes more than 200 compounds, including particulate emissions from diesel-fueled engines.

The Californian Air Resources Board (CARB) has long identified as a toxic air contaminant.[1] DPM differs from other TACs in that it is not a single substance but rather a complex mixture of hundreds of substances produced when an engine burns diesel fuel. DPM is a concern because it causes lung cancer; many compounds found in diesel exhaust are carcinogenic. DPM includes the particle-phase constituents in diesel exhaust. The chemical composition and particle sizes of DPM vary between different engine types (heavy-duty, light-duty), engine operating conditions (idle, accelerate, decelerate), fuel formulations (high/low sulfur fuel), and the year of the engine. Some short-term (acute) effects of diesel exhaust include eye, nose, throat, and lung irritation, and diesel exhaust can cause coughs, headaches, light-headedness, and nausea. DPM poses the greatest health risk among the TACs. Almost all diesel exhaust particle mass is 10 microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.

The proposed Whole Foods would provide two loading docks for delivery vehicles to support a 49,780 square-foot supermarket.[2] The Planning Department assumes this will generate 4 daily deliveries from 65-foot trucks and 4 daily deliveries from 30-48 foot trucks.[3] These trucks would be diesel-powered, many with Transport Refrigeration Units (TRUs) which also burn diesel even when the trucks they are mounted on are not running. In addition, the Department assumes that up to 20 additional daily deliveries would be made by other vehicles, which include "bobtail trucks and large or small vans."[4] Some number of these delivery vehicles may also be

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1 CARB, Executive Summary For the "Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant," Prepared by the Staff of the Air Resources Board and the Office of Environmental Health Hazard Assessment, As Approved by the Scientific Review Panel on April 22, 1998, available at https://oehha.ca.gov/media/downloads/air/document/diesel20exhaust.pdf.

2 Rachel Schuett, Transportation Planner, Transportation Coordination Memo, May 4, 2020.

3 *Id.*, Table 2.

4 *Id.*

diesel-powered. The Department estimates that the large trucks would dwell on-site for an hour and the smaller trucks would dwell for half an hour.[5] Thus, trucks that emit DPM would be operating on-site for 13.5 hours per day.[6]

Again, the Project site at 2675 Geary Boulevard is within an APEZ.[7] The Project's directly adjacent neighbor at 100 Masonic Street, the Epiphany Center/Mount St. Joseph-St. Elizabeth, is also within the APEZ.[8] *See* Attachment 1. The Epiphany Center provides "holistic client-centered care to a diverse population of children, women, and families who are the most vulnerable in our society."[9] The Epiphany Center provides both residential programs and various parent-child programs.[10] The nearby Wallenberg High School is likewise in an APEZ, as are the residential parcels directly across O'Farrell Street to the south and Masonic Avenue to the west. *See id.* Thus, the Project would contribute TAC emissions that would affect adjacent sensitive receptors also located in the APEZ.

Although it should be self-evident that introducing this new supermarket operation into an APEZ might at least have the "possibility" of causing significant impacts on air quality and human health, thereby disqualifying the Project from the "common sense" exemption from CEQA, we nevertheless consulted an air quality expert, Rahman Kapahi of the consulting firm Environmental Permitting Specialists, to estimate and model TAC emissions from the Project, and assess the resulting health risk using the truck and vehicle data generated by the Planning Department and contained in the Project file. Specifically, Mr. Kapahi performed a screening level analysis of health risk using the California Air Toxics Risk Prioritization Tool, a standard model used in connection implementing the AB-2588 Air Toxics Hot-Spots program. Mr. Kapahi's report and c.v. are attached to this letter as Attachment 2, and incorporated here by reference.

Mr. Kapahi affirms that the Project would introduce substantial TAC emissions into the residential area around the store, both from delivery vehicles and customer vehicles. TACs from project mobile sources would include diesel particulate matter, 1, 3 butadiene, benzene, formaldehyde, acetaldehyde. As his report explains and as summarized below, the Project by itself would have a significant health impact. It would also have an especially significant cumulative impact given the existing excess cancer risk in the APEZ.

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5 Transportation Coordination Memo, May 4, 2020.

6 *Id.*

7 San Francisco Property Information Map, search for 2675 Geary Blvd, visited June 18, 2020, available at https://sfplanninggis.org/PIM/.

8 *Id.*

9 Epiphany Center website, visited June 18, 2020, available at https://www.theepiphanycenter.org/who-we-are/mission-values/.)

10 *Id.*

As Mr. Kapahi documents, the Project's risk prioritization score for the Project exceeds the threshold used by BAAQMD for permitting and CEQA evaluations. Specifically, the cancer score shows the Project would cause excess cancers that exceed the commonly used threshold of significance of ten excess cancers per one million population, which is the threshold used by BAAQMD to determine if a project's impact, by itself, is significant.

Significant impacts may be caused by the cumulative effects of multiple projects over time. A cumulative impact analysis under CEQA makes two determinations: (1) whether the impact of the project in combination other projects exceeds the significance threshold, and (2) if so, whether the project's own effect is a considerable contribution. The first determination is necessary because the impact of an individual project may be "individually minor but collectively significant." In the second determination, if the cumulative effect is significant, the agency must consider whether the contribution of the project under review is "considerable," i.e., "whether 'any additional amount' of effect should be considered significant in the context of the existing cumulative effect." The second determination depends on the severity of the cumulative impact identified in step one, because the "greater the existing environmental problems are, the lower the threshold should be for treating a project's contribution to cumulative impacts as significant." Thus, CEQA requires cumulative impacts to be assessed in context, taking into account "the impacts of both the project under review and the relevant past, present and future projects."

Both BAAQMD and the City itself have determined that the project is located in an area that already suffers from elevated TAC-related cancer risk due to mobile source emissions; hence the APEZ designation pursuant to the Health Code. In particular, both agencies have determined that the project vicinity has a cancer risk from TACs of more than 100 excess cancers per one million, which is BAAQMD's threshold for determining the existence of a significant cumulative impact. BAAQMD concludes that once cumulative cancer risk from all sources exceeds 100 excess cancers, any additional risk is a considerable contribution.

IV. The Applicant has underreported the number and frequencies of daily truck deliveries to the Project, thus understating TAC emissions and masking even more substantial air quality and health effects.

Furthermore, the Project's TAC emissions are likely to be far higher than what Mr. Kapahi assumed, since it appears the Applicant and/or Planning Department staff have understated freight loading volume. There is no evidence or other justification for the Department's assumption that the number of daily truck deliveries for this 49,780 square foot Whole Foods store will be less than or equal to

the deliveries for the 15,000 square foot Whole Foods store at 1765 California Street. As we previously explained in comments to the Planning Commission, it is unreasonable to expect that a store three times larger will have the same number of freight loading trips. It defies credulity that Whole Foods would invest in the enterprise if it believed that the long-term business volume per retail square foot for the new store would be less than one-third of the business volume per square foot as at its California Street store.

The Applicant projects that the proposed Geary Blvd. store will attract 17,500 person-trips per day, which equates to 8,750 customers per day, the same as the California Street store one-third the size. The Planning Department's Transportation Coordination Memo claims that the equal patronage assumptions are justified by the greater population density around the California Street store, which it claims, "per Whole Foods' metrics," is twice the density of the of the population in "the immediate vicinity near 2675 Geary."[11] This statement, which is based uncritically on the applicant's purported "metrics," does not actually identify the density of the areas from which the stores would draw customers, which are presumably larger than "the immediate vicinity" of each store.

This claim is also inconsistent with the projection of store visits for the Project's traffic analysis. According to the San Francisco Travel Demand Tool, the tool used to project customer visits for the project, both the existing California Street store and the proposed Geary Boulevard store are located in the same urban medium density district, the Marina/Wester Market District.[12] The traffic analysis certainly does not assume that customer visits are limited by the low population density in "the immediate vicinity" of the Project; to the contrary, it projects that 10,075 of the 17,491 daily person-trips would be made by pedestrians.[13]

Furthermore, the implication in the Transportation Coordination Memo that the Project would have fewer delivery trips because it will carry fewer Stock Keeping Units (SKUs) is not accurate. According to the freight loading analysis performed by the applicant's consultant for the previously proposed 1600 Jackson Street store, Whole Foods operates both full service Whole Foods Markets and smaller, so-called 365 Stores, with the former offering 25,000 to 30,000 SKUs, and the latter only 7,500 SKUs.[14] As the consultant affirms, the "number of SKUs directly affects the number of vendors and deliveries needed for the given store." The proposed Geary Project is

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11 *See* Transportation Coordination Memo, May 4, 2020, p. 5.

12 *See* San Francisco County Travel Authority, San Francisco Travel Demand Tool, available at https://sftraveldemand.sfcta.org/

13 Transportation Coordination Memo, May 4, 2020, page 2.

14 Kittleson & Associates, 1600 Jackson Street Loading Analysis, April 19, 2018, p. 4

a full service Whole Foods Market, not a 365 Store, the number of vendors and deliveries needs will be far higher than reported.

For purposes of CEQA, therefore, the apparent significant understatement of the number of frequency of deliveries to the Project site by diesel-powered vehicles serves to further repudiate the Planning Department's determination that the Project qualifies for the "common sense" exemption, as discussed further below.

V. The Project does not qualify for the "common sense" exemption or any other exemption from CEQA.

After first determining that the Project qualified for the Infill exemption from CEQA, the Planning Department has changed tack and now determined that the Project is exempt from under the "common sense" exemption contained in 14 C.C.R. § 15061. This determination is not supported by the evidence in the record. As sated, the "common sense" exemption applies **only** "[w]here it can be seen **with certainty** that there is **no possibility** that the activity in question may have a significant effect on the environment." 14. C.C.R. § 15061(b)(3), emphasis added. This is an extremely rigid evidentiary standard that the City has the burden of satisfying. It simply cannot be met by this Project given its presence in an APEZ.

The courts have held that in making the required determination that there is no possibility that the activity in question may have a significant effect, the agency must make a factual review of the record to determine whether the exemption applies. As the California Supreme Court stated in *Muzzy Ranch Co. v. Solano County Airport Land Use Comm'n* (2007) 41 Cal.4th 372, 386, "whether a particular activity qualifies for the common sense exemption presents an issue of fact, and the agency invoking the exemption has the burden of demonstrating that it applies." *See CREED-21 v City of San Diego* (2015) 234 CA4th 488, 510. We submit that based on record generated by the Planning Department in support of its environmental determination, as well as on the accompanying analysis by Mr. Kapahi, the Project has a clear possibility, if not strong likelihood, of having a significant effect on air quality and human health for nearby residents.

Appellants would also point out that the Project does not qualify for the previously invoked Class 32 Infill exemption or indeed any other exemption from CEQA. Under CEQA Guidelines Section 15332, the Class 32 infill exemption does not apply under its own terms if there is substantial evidence that a project would cause significant impacts to traffic, noise, air quality, or water quality.[15] As discussed

[15] *Banker's Hill, Hillcrest, Park West Community Preservation Group v. City of San Diego* (2006) 139 Cal.App.4th 249, 267–269.

above, there is substantial evidence here that air quality impacts would be significant due to toxic air contaminants from diesel delivery vehicles. The Project would generate TACs that would adversely affect adjacent sensitive receptors. Based on the numbers of diesel deliveries and TRUs, it is likely that the TACs would exceed BAAQMD's significance thresholds for a significant impact from a single source, which is 10 excess cancers or an increase in PM2.5 concentrations of 0.3ug/m3.[16] The project would certainly exceed the BAAQMD thresholds for significant cumulative impacts.

Furthermore, even if the Class 32 or any other categorical exemption applied, it would still be inapplicable because two of the exceptions to categorical exemptions set out in CEQA Guidelines Section 15300.2 preclude reliance on the exemption. Under Section 15300.2(c), a categorical exemption is inapplicable if "there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances." As discussed above, the Project would bring diesel delivery vehicle emissions into an APEZ, an area containing sensitive receptors that has been identified by the City and BAAQMD as already experiencing elevated cancer risk. These are unusual circumstances relative to a typical grocery store proposal. Furthermore, the introduction of this additional TAC emission source creates a reasonable probability of a significant effect.

Finally, under Section 15300.2(b) a categorical exemption is inapplicable if "the cumulative impact of successive projects of the same type in the same place, over time is significant." The project and its neighbors are located in an area that both BAAQMD and the City have already designated as significantly impacted by cumulative toxic air contaminants. The basis of that designation is the emissions from successive development projects that require diesel-powered vehicles for delivery, access, and public transportation. BAAQMD provides that any additional contribution from this Project must be considered significant because its thresholds for cumulative TAC impacts are exceeded by the cumulative emission sources.

VI. Conclusion

For the foregoing reasons, the Project does not qualify for the "common sense" exemption or any categorical exemption from CEQA. The Planning Department should proceed to prepare an initial study in accordance with Guidelines Section 15063 before taking any action to approve the Project. We therefore ask the Board to GRANT the appeal and reverse the Planning Department's environmental determination for this Project.

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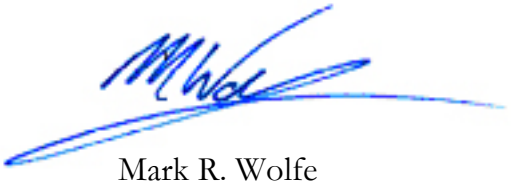
16 BAAQMD, CEQA Guidelines 2017, p. 2-5.

Thank you for your consideration of these points.

Most sincerely,

M. R. WOLFE & ASSOCIATES, P.C



Mark R. Wolfe
On behalf of Appellants Julie Fisher, Tony Vargas, and UFCW Local 5

MRW:sa
attachment

ATTACHMENT 1

ATTACHMENT 1

ATTACHMENT 1

ATTACHMENT 1

ATTACHMENT 1

ATTACHMENT 1

San Francisco **Property Information Map**

- Property
- Zoning Information
- **Environmental Information** 4
- Historic Preservation B
- Planning Applications 5
- Building Permits 18
- Other Permits 1
- Complaints
- Appeals 1
- BBNs

2675 GEARY BLVD

Environmental Information

The two sections below list environmental monitoring requirements and general environmental topics related to this property.

Report for: **2675 GEARY BLVD**

Environmental Monitoring

The following projects on this property require Environmental Monitoring, which may include mitigation measures, improvement measures, and/or Director Bulletin No. 2 type 3 clean construction priority processing applications. The Environmental Monitoring document can be found as a Related Document in the More Details section of each record below. For questions about a project's environmental monitoring contact cpc.environmentalmonitoring@sfgov.org.

Projects with Monitoring Requirements
Not applicable.

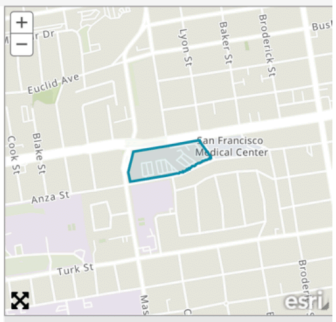
CEQA Information

Under the California Environmental Quality Act (CEQA), certain scopes of work may require additional environmental review. Below you will find property-specific information that may require further review and/or background studies for proposals reviewed by the Planning Department. For projects requiring a Project Application, use the information below to complete the Environmental Evaluation Screening Form (Page 5 and 6). Note that Preservation information is located in the Historic Preservation Tab; Environmental (ENV) projects, active and complete, can be found in the Planning Applications Tab. For questions please contact cpc.epintake@sfgov.org

100-Year Storm Flood Risk Zone
Not applicable.

Air Pollutant Exposure Zone
Health Code Article 38
Site is located in an area with elevated pollutant concentrations. Sensitive use buildings, as defined in the Applicability section of the Ordinance, must comply with Health Code Article 38.

CEQA Impact: An Environmental Evaluation Application may be required for projects that generate air pollutants.
Read more about this regulation
Added: 12/7/2014



Map Layers

- 100-Year Storm Flood Risk - Disclaimer
- Air Pollutant Exposure Zone (2014)
- Air Pollutant Exposure Zone (2020)
- Cortese
- Environmental Monitoring
- Maher Ordinance
- Seismic Hazard Zone - Landslide
- Seismic Hazard Zone - Liquefaction
- Serpentine Rocks
- Slopes of 20% or greater
- Slopes of 25% or greater

San Francisco **Property Information Map** **Epiphany Center - Mt. St. Joseph's/St. Elizabeth**

- Property
- Zoning Information
- **Environmental Information** 3
- Historic Preservation B
- Planning Applications
- Building Permits
- Other Permits
- Complaints
- Appeals
- BBNs

100 MASONIC AVE

Environmental Information

The two sections below list environmental monitoring requirements and general environmental topics related to this property.

Report for: **100 MASONIC AVE**

Environmental Monitoring

The following projects on this property require Environmental Monitoring, which may include mitigation measures, improvement measures, and/or Director Bulletin No. 2 type 3 clean construction priority processing applications. The Environmental Monitoring document can be found as a Related Document in the More Details section of each record below. For questions about a project's environmental monitoring contact cpc.environmentalmonitoring@sfgov.org.

Projects with Monitoring Requirements
Not applicable.

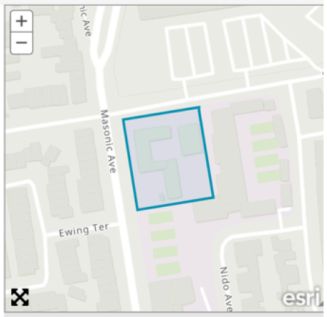
CEQA Information

Under the California Environmental Quality Act (CEQA), certain scopes of work may require additional environmental review. Below you will find property-specific information that may require further review and/or background studies for proposals reviewed by the Planning Department. For projects requiring a Project Application, use the information below to complete the Environmental Evaluation Screening Form (Page 5 and 6). Note that Preservation information is located in the Historic Preservation Tab; Environmental (ENV) projects, active and complete, can be found in the Planning Applications Tab. For questions please contact cpc.epintake@sfgov.org

100-Year Storm Flood Risk Zone
Not applicable.

Air Pollutant Exposure Zone
Health Code Article 38
Site is located in an area with elevated pollutant concentrations. Sensitive use buildings, as defined in the Applicability section of the Ordinance, must comply with Health Code Article 38.

CEQA Impact: An Environmental Evaluation Application may be required for projects that generate air pollutants.
Read more about this regulation
Added: 12/7/2014



Map Layers

- 100-Year Storm Flood Risk - Disclaimer
- Air Pollutant Exposure Zone (2014)
- Air Pollutant Exposure Zone (2020)
- Cortese
- Environmental Monitoring
- Maher Ordinance
- Seismic Hazard Zone - Landslide
- Seismic Hazard Zone - Liquefaction
- Serpentine Rocks
- Slopes of 20% or greater
- Slopes of 25% or greater

San Francisco **Property Information Map**

Raoul Wallenberg Traditional High School

- Property
- Zoning Information
- **Environmental Information** 2
- Historic Preservation B
- Planning Applications
- Building Permits
- Other Permits
- Complaints
- Appeals
- BBNs

40 VEGA ST

Environmental Information

The two sections below list environmental monitoring requirements and general environmental topics related to this property.

Report for: **40 VEGA ST**

Environmental Monitoring

The following projects on this property require Environmental Monitoring, which may include mitigation measures, improvement measures, and/or Director Bulletin No. 2 type 3 clean construction priority processing applications. The Environmental Monitoring document can be found as a Related Document in the More Details section of each record below. For questions about a project's environmental monitoring contact cpc.environmentalmonitoring@sfgov.org.

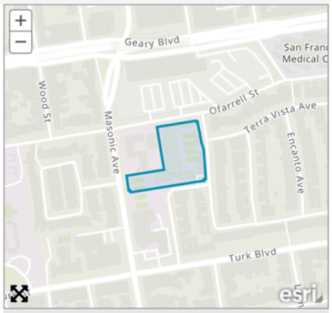
Projects with Monitoring Requirements
Not applicable.

CEQA Information

Under the California Environmental Quality Act (CEQA), certain scopes of work may require additional environmental review. Below you will find property-specific information that may require further review and/or background studies for proposals reviewed by the Planning Department. For projects requiring a Project Application, use the information below to complete the Environmental Evaluation Screening Form (Page 5 and 6). Note that Preservation information is located in the Historic Preservation Tab; Environmental (ENV) projects, active and complete, can be found in the Planning Applications Tab. For questions please contact cpc.epintake@sfgov.org

100-Year Storm Flood Risk Zone
Not applicable.

Air Pollutant Exposure Zone
Health Code Article 38
Not applicable.



Map Layers

- ☐ 100-Year Storm Flood Risk - Disclaimer
- ☐ Air Pollutant Exposure Zone (2014)
- ☐ Air Pollutant Exposure Zone (2020)
- ☐ Cortese
- ☐ Environmental Monitoring
- ☐ Maher Ordinance
- ☐ Seismic Hazard Zone - Landslide
- ☐ Seismic Hazard Zone - Liquefaction
- ☐ Serpentine Rocks
- ☐ Slopes of 20% or greater
- ☐ Slopes of 25% or greater

San Francisco **Property Information Map**

Residential Block - Example

- Property
- Zoning Information
- **Environmental Information** 1
- Historic Preservation C
- Planning Applications
- Building Permits
- Other Permits
- Complaints
- Appeals
- BBNs

83 MASONIC AVE

Environmental Information

The two sections below list environmental monitoring requirements and general environmental topics related to this property.

Report for: **83 MASONIC AVE**

Environmental Monitoring

The following projects on this property require Environmental Monitoring, which may include mitigation measures, improvement measures, and/or Director Bulletin No. 2 type 3 clean construction priority processing applications. The Environmental Monitoring document can be found as a Related Document in the More Details section of each record below. For questions about a project's environmental monitoring contact cpc.environmentalmonitoring@sfgov.org.

Projects with Monitoring Requirements
Not applicable.

CEQA Information

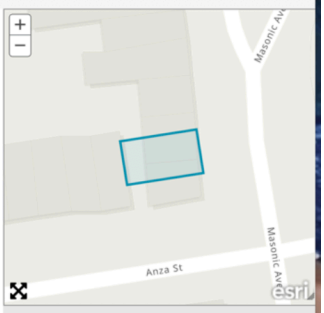
Under the California Environmental Quality Act (CEQA), certain scopes of work may require additional environmental review. Below you will find property-specific information that may require further review and/or background studies for proposals reviewed by the Planning Department. For projects requiring a Project Application, use the information below to complete the Environmental Evaluation Screening Form (Page 5 and 6). Note that Preservation information is located in the Historic Preservation Tab; Environmental (ENV) projects, active and complete, can be found in the Planning Applications Tab. For questions please contact cpc.epintake@sfgov.org

100-Year Storm Flood Risk Zone
Not applicable.

Air Pollutant Exposure Zone
Health Code Article 38
Site is located in an area with elevated pollutant concentrations. Sensitive use buildings, as defined in the Applicability section of the Ordinance, must comply with Health Code Article 38.

CEQA Impact: An Environmental Evaluation Application may be required for projects that generate air pollutants.
Read more about this regulation

Added: 12/7/2014



Map Layers

- ☐ 100-Year Storm Flood Risk - Disclaimer
- ☐ Air Pollutant Exposure Zone (2014)
- ☐ Air Pollutant Exposure Zone (2020)
- ☐ Cortese
- ☐ Environmental Monitoring
- ☐ Maher Ordinance
- ☐ Seismic Hazard Zone - Landslide
- ☐ Seismic Hazard Zone - Liquefaction
- ☐ Serpentine Rocks
- ☐ Slopes of 20% or greater
- ☐ Slopes of 25% or greater

Attachment 2

ENVIRONMENTAL PERMITTING SPECIALISTS
Air Quality • Permitting • OHSA • RMP/PSM

TECHNICAL MEMORANDUM

To: John Farrow
Wolf & Associates

Date: October 30, 2020

From: Ray Kapahi RK
Tel: 916-687-8352
Tel: 916-687-8352
E-Mail: ray.kapahi@gmail.com

Subject: Screening Level Health Risk Analysis of Emissions from Proposed Whole Foods Market Located on Geary Boulevard, San Francisco, CA

Environmental Permitting Specialists (EPS) has completed a screening level health risk evaluation for the above noted project and evaluated the cumulative sources of toxic air contaminants (TACs) and fine particulate matter (PM2.5) in the immediate vicinity of the project. The objectives in completing this evaluation are to determine whether the TAC or PM2.5 health impacts are significant from the project by itself or in combination with other cumulative projects of the same type in the same place.

1. Toxic Air Contaminants and PM2.5 cause serious health impacts.

According to section 39655 of the California Health and Safety Code, a toxic air contaminant (TAC) is "an air pollutant which may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health." Unlike for criteria air pollutants, there are no ambient air quality standards for TACs. Therefore, health risk based standards are used to assess their impacts.

Article 38 of the San Francisco Municipal Code recognizes that serious health effects are caused by exposure to traffic-caused air pollution sources from busy roadways, and that these impacts fall disproportionately on poor and certain minority communities.[1]

EPS reviewed the main sources of TACs that contribute to background cancer risk in California. A review completed by the California Air Resources Board (CARB) determined that the main source of background cancer risk is diesel particulate matter (DPM), but many TACs are also generated by gas-powered engines.[2] For the current project, the main sources of TAC's will be diesel and gas-powered delivery vehicles and customer vehicles.

2. The Project would generate toxic air contaminants and PM 2.5 from delivery vehicles, their associated transportation refrigeration units, and customer vehicles.

The Project would provide two loading docks for delivery vehicles to support a 49,780 square-foot supermarket.[3] The City of San Francisco assumes that this will generate 4 daily deliveries from 65-foot trucks and 4 daily deliveries from 30-48 foot trucks.[4] These trucks would be diesel-powered. In addition, the City assumes that up to 20 additional daily deliveries would be made by other vehicles, which include "bobtail trucks and large or small vans."[5] Some number of these delivery vehicles may also be diesel-powered. The City also assumes that the Project would generate 3,366 passenger vehicle trips per day consisting of 3,203 trips by private vehicle and 163 trips by taxi or transportation new work company.[6]

Since the proposed Whole Foods use is a supermarket, many delivery vehicles will use Transportation Refrigeration Units (TRUs).

> Transport Refrigeration Units (TRU) are powered by diesel internal combustion engines and are designed to refrigerate or heat perishable goods that are transported in various containers. Significant numbers of these units congregate at distribution centers, truck

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1 San Francisco Municipal Code, Article 38, § 3802.

2 California Air Resource Board, Risk Management Guidance for Stationary Sources of Air Toxics, July 23, 2015, available at https://ww2.arb.ca.gov/sites/default/files/classic//toxics/rma/rmgssat.pdf.

3 Rachel Schuett, Transportation Planner, Transportation Coordination Memo, May 4, 2020.

4 *Id.*, Table 2.

5 *Id.*

6 *Id.*

stops, and other facilities, emitting diesel particulate matter (PM) pollutant emissions, a toxic air contaminant, creating a health risk for those that live nearby.[7]

TRUs continue to operate even when delivery trucks are parked and unloading because the perishable goods must be kept at temperature.

The City estimates that the large trucks would dwell on-site for an hour and the smaller trucks would dwell for half an hour.[8] Thus, trucks that may emit DPM from TRUs would be on-site for 13.5 hours per day.[9]

3. Emissions from project delivery vehicles would exceed BAAQMD's and other air districts' thresholds of significance.

Delivery trucks, vans as well as customer vehicles would generate a variety of toxic air contaminants (TACs). Many of these TACs are known carcinogens, such as benzene, acetaldehyde and diesel particulates.

An evaluation of the emission rates of TACs and the cancer risks associated with exposure to these compounds can demonstrate that health risks associated with this project are significant. One widely used tool to determine if emissions of TACs are likely to pose significant public health risks is the "Risk Prioritization Tool," which was developed by the San Joaquin Valley Air Pollution Control District.[10] This tool is based on California's Air Toxics "Hot Spots" Information and Assessment Act of 1987.[11] This tool takes into account the amounts and toxicity of each TAC generated by a project and the proximity of the facility to nearby receptors such as homes

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7 CARB, Transportation Refrigeration Unit website, visited June 18, 2020, available at https://ww2.arb.ca.gov/our-work/programs/transport-refrigeration-unit.

8 Transportation Coordination Memo, May 4, 2020.

9 *Id.*

10 San Joaquin Valley Air Pollution Control District, CEQA web page, available at http://www.valleyair.org/transportation/ceqa_idx.htm [click on link to Prioritization Calculator under Screening Tools]; see also San Joaquin Valley Air Pollution Control District, Guidance for Assessing and Mitigating Air Quality Impacts, p. 45, available at http://www.valleyair.org/transportation/GAMAQI_12-26-19.pdf [recommending use of screening tools including spreadsheets to assess air quality impacts].

11 Information available at California Air Resources Board, "Hots Spots" Prioritization, available at https://ww2.arb.ca.gov/our-work/programs/ab-2588-air-toxics-hot-spots/hot-spots-prioritization.

and businesses. The Risk Prioritization Tool estimates cancer risk caused by TACs as well as their chronic and acute toxicity effects. Cancer risks are correlated with and depend on annual emissions of TACs.

One purpose of a risk prioritization screening is to determine whether the TAC risk warrants a refined health risk assessment.[12] Each District is free to establish a prioritization threshold at which facilities are required to prepare a health risk assessment.[13] See below:

AB 2588 District Prioritization Scores and Risk Threshold Levels

District	Prioritization Score Threshold						Notification Level		Risk Reduction Audit and Plan	
	Cancer		Noncancer Chronic		Noncancer Acute		Cancer	Non-cancer	Cancer	Non-cancer
	High	Low	High	Low	High	Low				
Amador	≥10	≤1	≥10	≤1	≥10	≤1	≥10	≥1	≥10	≥1
Antelope Valley	10	1	10	1	10	1	10	1	100	10
Bay Area	≥10	<1	≥10	<1	≥10	<1	>10	>1	>100	>10
Butte	≥100	<1	≥100	<1	≥100	<1	10	≥1	none	none
Calaveras	none	none	none	none	none	none	10	none	10	none
Colusa	>10	<1	>10	<1	>10	<1	>10	>1	>10	>1

BAQMD has adopted a threshold for cancer risk prioritization score of 10. These thresholds are used for both permitting and CEQA evaluations.

For the current project, we assumed just 8 diesel-powered truck deliveries per day along with 3,366 customer vehicles per day that would release TAC emissions based on vehicle travel within 1,000 feet of the project site, plus on-site idling and TRU emissions. For trucks, a 5 minute idle time was assumed, consistent with state law. TRUs were assumed to operate 60 minutes. We conservatively assumed only four refrigerated delivery vehicles using TRUs per day, even though the project would have 23 daily deliveries.

We estimated emissions of TACs using data from the California Air Resources Board for sources of diesel particulate matter and the academic literature for TAC emissions from gas-powered

[12] California Air Resources Board and California Air Pollution Control Officers Association, Risk Management Guidance for Stationary Sources of Air Toxics, July 23, 2015, pp. 22, 49, available at https://ww2.arb.ca.gov/sites/default/files/classic//toxics/rma/rmgssat.pdf?_ga=2.109727052.894744087.1604609123-1470358659.1594663568.

[13] California Air Resources Board, AB 2588 District Prioritization Scores and Risk Threshold Levels, available at https://ww2.arb.ca.gov/ab-2588-district-prioritization-scores-and-risk-threshold-levels-0.

light duty vehicles. These sources are identified in the notes to Exhibit 1, Tables 1 and 2. We entered these estimated TAC emissions into the Risk Prioritization Tool to determine the risk prioritization scores for cancer, actute toxicity, and chronic toxicity.

The resulting risk prioritization score would exceed the screening level cancer risk prioritization score of 10. Our analysis shows that the cancer risk score would exceed 10.6 for distances of 250 meters (0.15 mile). The score would equal 42.5 for distance to 100 meters (328 feet). A copy of the screening level risk analysis as well as estimate of emissions is provided in Exhibit 1.

The Project's cancer score of 42.5 indicates that it would cause an excess cancer rate in the vicinity to exceed ten excess cancers in one million population. Locations immediately adjacent to Whole Foods containing sensitive receptors, such as Epiphany Center, would be exposed to a risk score in excess of 10.6 The screening level prioritization calculation assumes all emissions are centered at the project site. In reality, the emissions would also occur along the roadways such as Masonic Avenue. This would place toxic emissions immediately adjacent to sensitive receptors, such as the Epiphany Center, which is located on Masonic Avenue. As a result, the cancer prioritization score would be well over 10.6

Ten excess cancers in one million is the CEQA threshold of significance recommended by many California air districts in their CEQA guidance documents, e.g., South Coast Air Quality Management District, San Luis Obispo County Air Pollution Control District, Bay Area Air Quality Control District, and Sacramento Metropolitan Air Quality Management District.[14] Thus, the Project, by itself, would cause a significant TAC impact to nearby sensitive receptors.

In addition, the Project would make a considerable contribution to a significant cumulative TAC impact. CEQA recognizes that significant impacts may be caused by cumulative effects of multiple projects affecting the same resource.[15] Thus, cumulative impact analysis requires an agency to determine: (1) whether the impact of the project in combination other projects

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[14] South Coast Air Quality Management District, South Coast AQMD Air Quality Significance Thresholds, Revised April 2019, available at http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf; San Luis Obispo County Air Pollution Control District, CEQA Air Quality Handbook, April 2012, page 3-7, available at https://storage.googleapis.com/slocleanair-org/images/cms/upload/files/CEQA_Handbook_2012_v2%20%28Updated%20Map2019%29_LinkedwithMemo.pdf; Bay Area Air Quality Control District, CEQA Air Quality Guidelines, May 2017, page 2-5, available at https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en; Sacramento Metropolitan Air Quality Management District, SMAQMD Thresholds of Significance Table, April 2020, available at http://www.airquality.org/LandUseTransportation/Documents/CH2ThresholdsTable4-2020.pdf.

[15] CEQA Guidelines, §§ 15065(a)(3), 15355.

exceeds the significance threshold, and (2) if so, whether the project's own effect is a considerable contribution.

The Bay Area Air Quality Management District (BAAQMD) identifies a significant cumulative impact from TACs when cancers exceed 100 in one million or when PM 2.5 concentrations exceed 0.8 ug/m3.[16] As discussed below, BAAQMD and the City have both determined that excess cancers from existing TAC sources in the Project vicinity do exceed 100 in one million. Thus, there is a significant cumulative TAC impact in the Project vicinity. The question then becomes whether the Project will make a considerable contribution.

When it adopted its threshold of significance for cumulative TACs in 2009, BAAQMD explained that once the cumulative threshold of 100 excess cancers was exceeded, any additional risk caused by a new project is significant:

> Cumulative thresholds for sources recognize that some areas are already near or at levels of significant impact. If within such an area there are receptors, or it can reasonably be foreseen that there will be receptors, then a cumulative significance threshold sets a level beyond which any additional risk is significant.[17]

BAAQMD's current Thresholds of Significance Justification reiterates that its threshold of 100 excess cancers from all sources "sets a level beyond which any additional risk is significant."[18]

BAAQMD's Thresholds of Significance Justification provides a scientific and regulatory justification for its thresholds of significance, including its thresholds for cumulative analysis of TACs. BAAQMD set its 100 excess cancer threshold for cumulative risk at a level ten times higher than its 10 excess cancer threshold for a significant project-specific impact from a project by itself. BAAQMD explains that its 100 excess cancer threshold represents the upper end of the U.S. EPA's guidance for the "range of acceptable cancer risks" in "making risk management decisions at the facility- and community-scale level:"

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[16] BAAQMD, CEQA Guidelines, May 2017, p. 2-5, https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en.

[17] BAAQMD, Proposed Air Quality CEQA Thresholds of Significance December 7, 2009, p. 34 [emphasis added], available at https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/proposed-thresholds-of-significance-dec-7-09.pdf?la=en.

[18] BAAQMD, CEQA Guidelines, May 2017, Appendix D, Thresholds of Significance Justification, p. D-34, available at https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en.

> Cancer risk from TACs is typically expressed in numbers of excess cancer cases per million persons exposed over a defined period of exposure, for example, over an assumed 70 year lifetime. The Air District is not aware of any agency that has established an acceptable level of cancer risk for TACs. However, a range of what constitutes a significant increment of cancer risk from any compound has been established by the U.S. EPA. EPA's guidance for conducting air toxics analyses and making risk management decisions at the facility- and community-scale level considers a range of acceptable cancer risks from one in a million to one in ten thousand (100 in a million). The guidance considers an acceptable range of cancer risk increments to be from one in a million to one in ten thousand. In protecting public health with an ample margin of safety, EPA strives to provide maximum feasible protection against risks to health from HAPs by limiting additional risk to a level no higher than the one in ten thousand estimated risk that a person living near a source would be exposed to at the maximum pollutant concentrations for 70 years. This goal is described in the preamble to the benzene National Emissions Standards for Hazardous Air Pollutants (NESHAP) rulemaking (54 Federal Register 38044, September 14, 1989) and is incorporated by Congress for EPA's residual risk program under Clean Air Act section 112(f).[19]

BAAAQMD's reasoning in setting the threshold for what counts as a significant cumulative risk at EPA's upper limit of 100 excess cancers is that, when cumulative risk is that high, "any additional risk" from the project under review must be identified as significant, i.e., as a considerable contribution to a significant cumulative impact. Here, since the Project would contribute substantial additional TAC risk, it would make a considerable contribution to the significant cumulative TAC impact.

Finally, in addition to the Risk Prioritization tool and as part of its permitting program, BAAQMD has identified annual emission rates of TACs that are considered significant and require the preparation of a risk assessment.[20] Specifically, under District Regulation 2, Rule 5, diesel particulate matter emissions in excess of 0.34 pounds per year are considered significant that requires the preparation of a health risk assessment. The threshold for benzene under the same regulation is 3.8 pounds per year. Vehicular emissions from the Whole Foods project would generate 12.63 pounds of diesel particulate and 113 pounds of benzene per year respectively. These levels are well in excess of levels the District considered harmful. It is recognized that the

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[19] BAAQMD, CEQA Guidelines, May 2017, p. D-35, available at https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en.

[20] BAAQMD, Regulation 2, Permits, Rule 5, New Source Review of Toxic Air Contaminants, available at https://www.baaqmd.gov/~/media/dotgov/files/rules/reg-2-rule-5-new-source-review-of-toxic-air-contaminants/documents/rg0205_120716-pdf.pdf?la=enBAAQMD; see Table 2-5-1 " Toxic Air Contaminant Trigger Levels," available at: https://www.baaqmd.gov/~/media/files/engineering/air-toxics-programs/table_2-5-1.pdf.

current project is not subject to District permits, nevertheless, the annual emission rates of TACs noted in Regulation 2, Rule 5 do provide thresholds that are considered harmful to the public.

4. The Project is located in an area in which BAAQMD has identified a significant cumulative impact from toxic air contaminants.

In 2004, BAAQMD initiated the Community Air Risk Evaluation (CARE) program to intensify efforts to reduce air pollution in areas with greatest air pollution burdens and with most vulnerable populations."[21] As part of that program, BAAQMD identified impacted communities, describing this effort in a publication titled "Identifying Areas with Cumulative Impacts from Air Pollution in the San Francisco Bay Area."[22] One impacted area was eastern San Francisco, based on the presence of relatively high levels of toxic air contaminants, relatively high exposures of youth and seniors to toxic air contaminants, and relatively high levels of poverty.[23]

BAAQMD used both modeled and measured air pollution to map TAC concentrations for each zip code.[24] BAAQMD determined excess cancer risks and PM 2.5 concentrations based on these modeled and measured TAC concentrations.[25] BAAQMD identified the cancer risk from TACs in the 94118 zip code, in which the proposed Project is located, as 191.9 excess cancers in one million.[26] BAAQMD identifies the mean annual PM 2.5 concentration in the 94118 zip code as 9.3 ug/m3.[27]

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21 BAAQMD, Identifying Areas with Cumulative Impacts from Air Pollution in the San Francisco Bay Area, Version 2, March 2014, p. 7, available at https://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CARE%20Program/Documents/ImpactCommunities_2_Methodology.ashx?la=en.

22 *Id.*

23 *Id.*

24 *Id.* at 14.

25 *Id.* at 15.

26 BAAQMD, Impacted Areas by Zip Code, http://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CARE%20Program/Documents/ImpactCommunities_2_ScoresbyZipCode.ashx?la=en.

27 *Id.*

Again, for reference, BAAQMD identifies a significant cumulative impact from TACs when cancers exceed 100 in one million or when PM 2.5 concentrations exceed 0.8 ug/m3.[28] Thus, BAAQMD has identified an existing significant cumulative impact from toxic air contaminants at the Project site and in its vicinity.

5. The Project is located in an area that the City has identified as impaired by cumulative PM2.5 emissions and has located in an Air Pollution Exposure Zone based on cumulative TAC concentrations that are above health protective levels.

As part of its CARE program, BAAQMD asked cities with impacted communities to develop a Community Risk Reduction Program (CRRP).[29] Although San Francisco has not completed its CRRP, it has identified and mapped areas in which TAC and PM2.5 exposures are above health protective levels.[30] This mapping was based on the identification of "fine particle concentrations and potential cancer risk from thousands of individual pollution sources [] estimated on a 20 meter receptor grid to provide sufficient detail for planning applications."[31]

For example, as part of its CRRP, the City developed emissions estimates, modeled PM2.5 and TAC concentrations, and estimated excess cancers from TAC for the years 2010, 2014, and 2025 throughout the City.[32] *The San Francisco Community Risk Reduction Plan: Technical Support Documentation* describes the methods and specific emission sources used within this model. The *Technical Support Documentation* explains that the analysis built on modeling systems and inputs developed by the San Francisco Department of Public Health to support San Francisco's

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[28] BAAQMD, CEQA Guidelines, May 2017, p. 2-5, https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en.

[29] See description of CRRP in San Francisco in BAAQMD, Improving Air Quality & Health in Bay Area Communities Community Air Risk Evaluation (CARE) Program Retrospective & Path Forward (2004 - 2013) April 2014, pp. 96-98, available at https://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CARE%20Program/Documents/CARE_Retrospective_April2014.ashx?la=en.

[30] *Id*. at 79-80, 96-97.

[31] *Id.* at 96.

[32] BAAQMD, San Francisco Dept. of Public Health, and San Francisco Planning Dept, The San Francisco Community Risk Reduction Plan: Technical Support Documentation, December 2012, p. 3, available at https://www.gsweventcenter.com/Appeal_Response_References/2012_1201_BAAQMD.pdf.

Article 38, an ordinance that mandates particulate matter filtration near busy roadways.[33] The analysis included emissions estimates for PM 2.5, diesel particulate matter, and other carcinogenic compounds including exhaust from gas-powered vehicles.[34] The analysis considered mobile sources, stationary sources, transit and rail, and major construction projects, but it excluded indirect sources that generate vehicle trips such as distribution centers, retail centers, and postal service stations.[35] Furthermore, the analysis only considered locally generates sources of emissions, not regional sources:

> …the dispersion modeling, from which the maps are derived, produced concentrations and risk estimates from direct emissions. The maps themselves therefore portray concentrations of directly emitted PM2.5 and cancer risk associated with directly emitted TAC at locations near the sources of these emissions. The results do not reflect regional or long-range transport of air pollutants. Nor do they include the effects of the chemical transformation (formation or loss) of pollutants.[36]

The mapping of PM2.5 concentrations in *The San Francisco Community Risk Reduction Plan: Technical Support Documentation* shows levels in excess of the BAAQMD cumulative significance threshold of 0.8 ug/m3 in the vicinity of Geary and Masonic.[37] The primary source of PM2.5 at this location is mobile sources.[38]

Mapping of cumulative PM2.5 and excess cancer risks was intended to identify Air Pollution Exposure Zones, which are the areas in which PM2.5 and cancer risks are so high that new construction requires filtration-enhanced ventilation:

> The Air District working with SFPHD and SF Planning Department developed a San Francisco-specific emission inventory of mobile and stationary sources used to model exposure point concentrations and risk estimates for the CRRP. The mapped results were then used to identify areas, called **Air Pollution Exposure Zones where PM2.5 concentrations and cancer risks were above health protective levels.** Residential projects that fall in these zones are required to install filtration-enhanced ventilation

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33 *Id.*

34 *Id.* at 5.

35 *Id.* at 4.

36 *Id*. at 37.

37 *Id.* at 54, Figure 23.

38 *Id.* at 39, Figure 11.

> under Article 38. San Francisco adopted the revised Health Code Article 38 with updated Air Pollutant Exposure Zone map (see Figure 44) in December 2014. Article 38 was further amended to require SFDPH and SFPD to provide revised Air Pollutant Exposure Zone every five years to determine which property parcels are subject to the Article's required filtration-enhanced ventilation. While Article 38 requirements protect new residents, SFDPH wanted to pursue whether this control would benefit existing homes near high trafficked roadways which lead to the implementation and completion of this study.[39]

Article 38 defines an Air Pollution Exposure Zone to include all "locations in the City where the estimated cumulative $PM_{2.5}$ concentration is greater than 10 µg/m3 or where the estimated cumulative excess risk of cancer from air pollutants resulting from lifetime (70 year) exposure is greater than 100 in a million."[40]

As the Planning Commission staff report acknowledges, the proposed Project at 2675 Geary Street is within an Air Pollution Exposure Zone (APEZ).[41] The Project's directly adjacent neighbor at 100 Masonic Street, The Epiphany Center/Mount St. Joseph-St. Elizabeth, is also within the APEZ.[42] The Epiphany Center provides "holistic client-centered care to a diverse population of children, women, and families who are the most vulnerable in our society."[43] The Epiphany Center provides both residential programs and various parent-child programs.[44] San Francisco defines residential uses and adult-care and child-care uses as sensitive uses.[45]

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[39] San Francisco Department of Public Health et al., "Measurement Study to Evaluate In-Home Pollutant Exposure Mitigation Approaches at Sites with Elevated Traffic-Related Air Pollutants, 2018, page 17, emphasis added, available at https://www.baaqmd.gov/~/media/files/planning-and-research/care-program/documents/2018/sfdph_indoorair7_interactive-pdf.pdf?la=en.

[40] San Francisco Municipal Code, Article 38, § 3809(a).

[41] San Francisco Planning Commission, Staff Report for 2019-004110CUA, 2675 Geary Boulevard, May 28, 2020, Exhibit C; San Francisco Property Information Map, search for 2675 Geary Blvd, visited October 28, 2020, available at https://sfplanninggis.org/PIM/.

[42] *Id.*

[43] Epiphany Center website, October 28, 2020, available at https://www.theepiphanycenter.org/who-we-are/mission-values/.)

[44] *Id.*

[45] San Francisco Municipal Code, Article 38, § 3804.

Thus, the Project would contribute TACs that would affect adjacent sensitive receptors also located in the APEZ. In addition, there are sensitive receptors located directly across O'Farrell Street from the Project site, including residential uses and the Raoul Wallenburg Traditional High School. In sum, the project's TAC and PM2.5 emissions would exacerbate an existing significant cumulative impact in its immediate vicinity.

EXHIBIT 1

Copy of Risk Prioritization Score Calculation

Supporting Emission Rates for TACs

Copy of Risk Prioritization Score Calculation

	A	B	C	D	E	F	G	H
1	**Unit and Process#**	Whole Foods Market SF, Screening Level HRA - - Rev Oct 30_2020. Based on 3,366 customer vehicles and 4 TRUs per day.						
2	**Operating Hours hr/yr**	8,760.00						
3	Receptor Proximity and Proximity	**Cancer**	**Chronic**	**Acute**		Receptor proximity is in meters. Priortization scores are calculated by multiplying the total scores summed below by the proximity factors. Record the Max score for your receptor distance. If the substance list for the unit is longer than the number of rows here or if there are multiple processes use additional worksheets and sum the totals of the Max Scores.		
4	Factors	**Score**	**Score**	**Score**	**Max Score**			
5	**0< R<100 1.000**	42.562	0.433	0.821	4.26E+01			
6	**100≤R<250 0.250**	10.640	0.108	0.205	1.06E+01			
7	**250≤R<500 0.040**	1.702	0.017	0.033	1.70E+00			
8	**500≤R<1000 0.011**	0.468	0.005	0.009	4.68E-01			
9	**1000≤R<1500 0.003**	0.128	0.001	0.002	1.28E-01			
10	**1500≤R<2000 0.002**	0.085	0.001	0.002	8.51E-02			
11	**2000<R 0.001**	0.043	0.000	0.001	4.26E-02			
12		Enter the unit's CAS# of the substances emitted and their amounts.				Prioritzation score for each substance generated below. Totals on last row.		
13	**Whole Foods Market SF, Screening Leve**							
14	**Substance**	**CAS#**	**Annual Emissions (lbs/yr)**	**Maximum Hourly (lbs/hr)**	**Average Hourly (lbs/hr)**	**Cancer**	**Chronic**	**Acute**
15					0.00E+00	0.00E+00	0.00E+00	0.00E+00
16	**1,3-Butadiene**	106990	5.58E+00	9.55E-04	6.37E-04	7.30E+00	4.78E-02	2.17E-03
17	**Benzene**	71432	5.64E+01	1.29E-02	6.44E-03	1.26E+01	3.22E-01	7.17E-01
18	**Formaldehyde**	50000	1.60E+01	3.66E-03	1.83E-03	7.39E-01	3.04E-02	9.98E-02
19	**Acetaldehyde**	75070	3.45E+00	7.87E-04	3.94E-04	7.17E-02	4.22E-04	2.51E-03
20	**Diesel engine exhaust, particulate matter (Diesel PM)**	9901	9.46		1.08E-03	2.19E+01	3.24E-02	0.00E+00
21					0.00E+00	0.00E+00	0.00E+00	0.00E+00

MARPLOT

Controls | Edit | Search & Get Info | ALOHA & CAMEO | Other

Selection Info

Selection Area (Circular)

Radius: 0.160 miles **Perimeter**: 1.01 miles **Area**: 0.080 sq miles

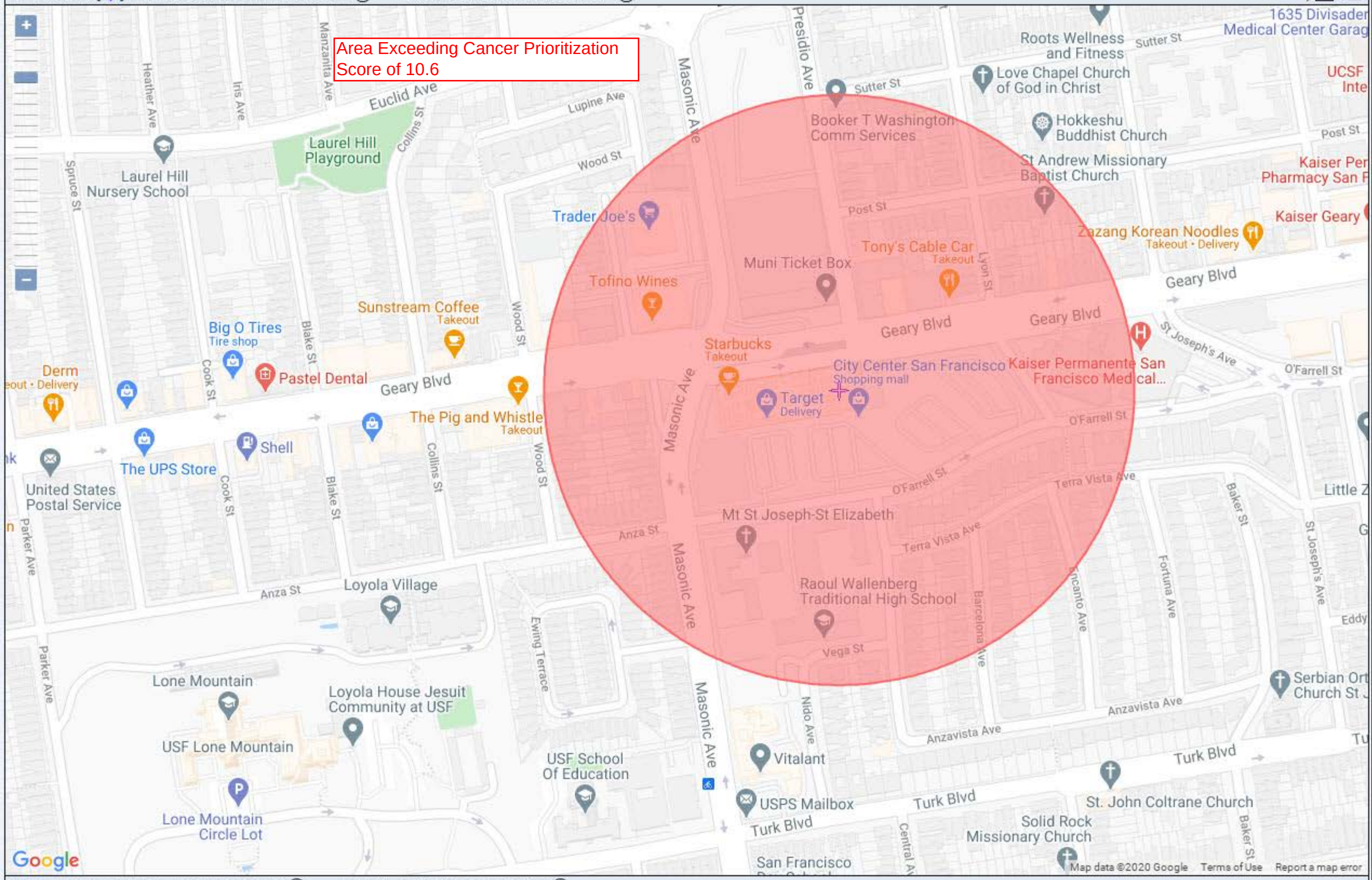
Extra Tools

2010 U.S. Census Data

Population: 1,350

Housing units: 619

Click Point (◈): 37.782131°N, 122.445985°W USNG: 10S EG 48785 81787



Cursor: 37.784624°N, 122.442471°W USNG: 10S EG 49093 82065

MARPLOT

Controls | Edit | Search & Get Info | ALOHA & CAMEO | Other

Edit: Temporary Layer

Selection Info

Selection Area (Circular)

Radius: 0.160 miles **Perimeter:** 1.01 miles **Area:** 0.080 sq miles

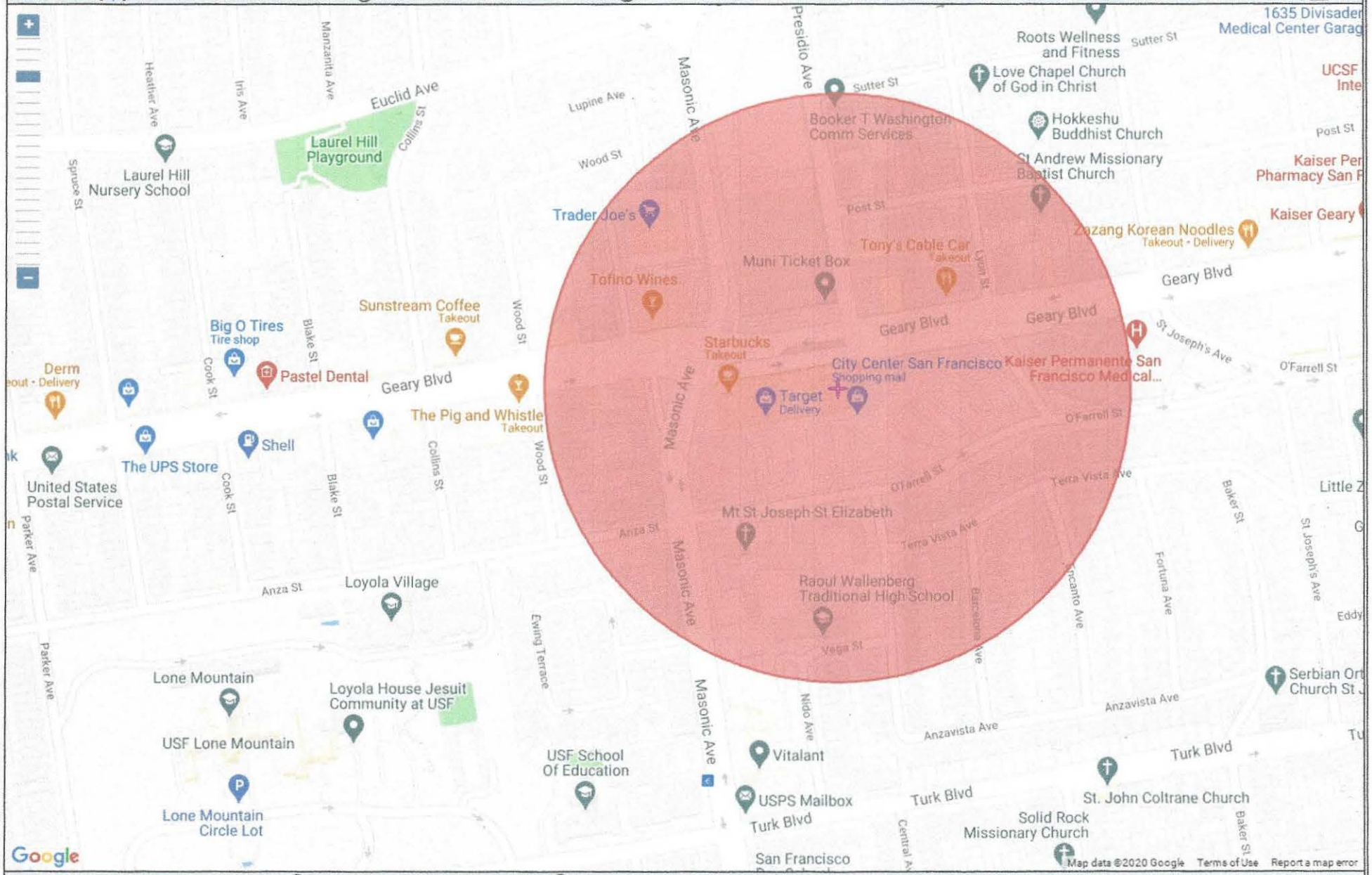
Extra Tools

2010 U.S. Census Data

Population: 1,350

Housing units: 619

Click Point ( ): 37.782131°N, 122.445985°W USNG: 10S EG 48785 81787



Cursor: 37.784624°N, 122.442471°W USNG: 10S EG 49093 82065

Supporting Emission Rates for TACs

Table 1
Calculation of On-Site DPM Emissions
Whole Foods, geary Boulevard, San Francisco

IDLING EMISSIONS	Units	
HD Trucks Count	*(trucks/day)*	8
Truck Idling		
Idle rate per truck	*(min/truck)*	5
Idle rate all trucks	*(min/day)*	40
Idle time per day all trucks	*(hrs/day)*	0.7
idle time per year all trucks	*(hrs/yr)*	243.3
Emission Factor for Vehicle Idling (Note 1)	*(grams/vehicle-hr)*	0.019776
Idling Emissions All Trucks	*(grams/yr)*	4.8
	(lbs/yr)	0.01

EMISSIONS FROM On-Site Truck Movement	Units	
Daily Truck Volume	(Trucks/day)	8
Distrance Travelled On-Site		
1 Truck	*(mile/truck)*	0.05
All Trucks/day	*(miles/day)*	0.40
All Trucks (per year)	*(miles/yr)*	146
Emission Factor (EMFAC 2017 for HD Trucks CY 2022)	*(gram/mile)*	0.06449
Emissions		
1 Truck (per mile)	*(grams/mile)*	0.06449
All Trucks (per day)	*(grams/day)*	0.02580
All Trucks (per year)	*(grams/yr)*	9.42
	(lbs/yr)	0.021

EMISSIONS FROM TRUs	Units	
No. of Trucks (50% of all HD Trucks)	*(trucks with TRUs/day)*	4.0
TRU Operating Time		
1 TRU	*(min)*	45
All TRUs	*(hrs/day)*	3.0
Average TRU Engine Size	*(hp)*	34
Emission Factor for TRUs (Note 2)	*(grams/hp-hr)*	0.25
Load Factor (Note 3)		0.46
Emission Rate		
1 Truck (engine HP x EF x Load Factor)	*(grams/hr)*	3.91
All Trucks (x daily operating hrs for all trucks)	*(grams/day)*	11.73
(x365)	*(grams/yr)*	4,281.5
(1 lb/454 grams)	*(lbs/yr)*	9.43
TOTAL On-Site (Idling +On-Site Move't+TRUs)	*(lbs/yr)*	9.46

Notes
1. Available at: https://ww3.arb.ca.gov/msei/emfac2011_idling_emission_rates.xlsx
2. Emission Factor from ARB: https://ww3.arb.ca.gov/regact/trude03/fro1.pdf

3. Draft 2019 Update to Emissions Inventory for Transport Refrigeration Units. California Air Resources Board October 2019. Section 3.6, Table 9.

Table 2
Calculation of Toxic Emissions from Light Duty Delivery Vehicles within 0.23 mile of Whole Foods Site

No. of Vehicles per Day	1,683	veh/day
	614,295	veh/yr
Length of Roadway	0.23	mile (1,000 feet)
Annual Miles (annual number of cars x 0.23 mil x 2)	282,576	miles/yr

(Annual number of cars x 0.23 mil x 2)
to account for round trip per vehicle

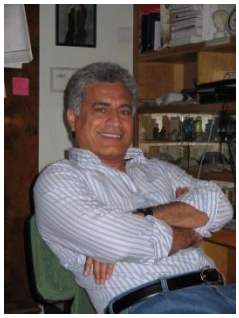
	EF	Emission Rate (Vehicle Travel)			Emission Rate (vehicle travel + idle + start-up/shut down)
TAC	(mg/mile)	(mg/yr)	(g/yr)	(lb/yr)	(lb/yr)
1,3 Butadiene	4.48	1,265,939	1265.939	2.788	5.5768
Benzene	45.28	12,795,028	12795.028	28.183	56.3658
Formaldehyde	12.87	3,636,749	3636.749	8.010	16.0209
Acetaldehyde	2.77	782,735	782.735	1.724	3.4482
Nox [grams/yr]	0.0536		15139.6	33.3	66.7
	(gram/mile)		(g/yr)	(lb/yr)	
PM-2.5	0.00171		483.204	1.0643	1.0643

NOTES
1. Emission Factors From: Zhu, Durbin, Norbeck and Cocker (July 2004)
"Internal Combustion Engine (ICE) Air Toxic Emissions"
Final Report to Research Division CARB, Sacramento, CA
2. Emissions from Vehicle Idle + start-up and shut-down estimated to equal 50% of emissions from vehicle travel

File: Oct 25_Whole Foods Emissions
Sheet: 2 Off-Ste Auto Travel

Ray Kapahi

Senior Air Quality
Consulting Engineer



Ray.Kapahi@gmail.com

Office: 916.687.8352
Mobile: 916.806.8333

Practice Areas

- Air Quality Permitting
- Odor Investigation and Control
- Health Risk Assessment
- Computational Fluid Dynamics
- Greenhouse Gas Analysis
- Atmospheric Dispersion Modeling

Industries

- Solid Waste
- Energy Production
- Construction and Mining
- Cannabis Cultivation
- Oil and Gas Production
- Food Industries

Education and Training

- BSc. Physics (1972)
- MEng. Chemical Engineering (1975)
- CARB Accredited Green House Gas (GHG) Lead Verifier with Specialization in Process Emissions and Electricity Transactions (2009)

News

- Presentation "Numerical Modeling of Landfill Gas and Odors" 33rd International Conference on Solid Waste Technology and Management. March 11 to 14, 2018, Annapolis, MD.

- Presentation "Integrated Approach to Effective Odor Control at Landfills and Composting Facilities" Wastecon 2016, Indianapolis, IN.

EXPERIENCE

Over 30 years of experience in analyzing air quality and odor impacts, permitting of stationary sources, and preparation of environmental impact documents. Mr. Kapahi assists a broad range of clients and assists them to identify and meet their regulatory obligations.

The scope of his experience includes siting of new landfills, waste to energy plants, obtaining conditional use permits from City and County Governments for new projects or expansion of existing projects. Specific experience and skills include preparation of emission inventories, analysis and measurements of odors, dispersion modeling, oversight of air quality monitoring, analysis of impacts to public health, responding to public comments, and appearing before City and County Planning Boards and Commissions as an expert witness on behalf of clients.

Following approvals for new facilities or expansion of existing facilities, Mr. Kapahi continues to work with clients to ensure on-going compliance.

REPRESENTATIVE PROJECTS

Air Quality Modeling and Permitting

- **Permitting of a Powdered Milk Plant (Turlock, CA)**

Evaluate emissions of various air pollutants from the proposed 30 million gallons per year mild processing/drying facility. Demonstrate compliance with local and state air quality regulations, including regulation of toxic air pollutants.

- **Permit Revisions for an Existing Fruit Dehydration Facility (Yuba City, CA)**

Assisted a major food processor in revising their operating permits to allow for additional steam production. Worked cooperatively with the local air district to ensure timely issuance of the revised permits.

- **Permitting of a Waste to Energy Plant (Fort Irwin, CA)**

Quantify emissions from a proposed 34 tons per day solid waste to energy project. Analyze emissions associated with pyrolysis and subsequent utilization of synthetic gas to generate 1.5 MW of electric power. Prepare the necessary permit applications and supporting documentation.

- **Permitting of a CBD Oil Extraction Facility (Mendota, CA)**

Quantify emissions from a proposed solvent extraction process. Assist in design of an RTO VOC control system. The facility was permitting in 2019 and is currently operating.

Publications and Presentations

Presentation "Use of Advanced Models to Control Fugitive Odors from Composting Sites". US Compost Council Annual Meeting, January 2015, Austin, TX.

"Air Emissions from Landfills and Transfer Stations – Do they Increase Public Health Risks?" Presented at Quad State Environmental Conference, Pigeon Forge TN, Sept 2015.

"Risks of Carbon Credit Invalidation Under California's Cap-and-Trade Program", Presented at the 2014 Air and Waste Management Association Annual Conference. June 24-27, 2014. Long Beach, CA

"Estimate of VOC Emissions from Sludge Drying", Presented at the 1995 SWANA Conference. November 1995, Baltimore, MD.

"Use of Biofilters to Control VOCs", Biocycle, February 1995.

"Impacts of the 1990 Clean Air Act Amendments", San Jose Business Journal, March 24, 1994.

"Modeling Fine Particulates" in Municipal Waste Incineration Risk Assessment, Edited by Curtis Travis, Plenum Press, 1990.

Specialized Training

Calculating Tank Emissions. Trinity Consultants. Los Angeles, CA February 1-2, 2020.

Accidental Release Modeling Workshop. Trinity Consultants. Dallas, TX November 1-2, 2018.

HARP2 (Risk Assessment Model) Training at California Air Resources Board. Redding, CA

Hearing Board Variance Training – California Air Resources Board (1995)

Air Emissions and Odors from Wastewater – University of Texas, Austin (1994)

Professional Affiliations

Air and Waste Management Association (Board Member)

American Institute of Chemical Engineers (Member)

Odor Analysis and Mitigation

- **Ventilation System for Odor Control (Anaheim, CA)**

Advanced computational fluid mechanics (CFD) models were used to predict the air flow and building pressure to identify the location, size and number of exhaust fans required to remove odors from the transfer station building.

- **Migration of Odors and Aerosol from Leachate Evaporation Pond (Bi-County Landfill, Montgomery County, TN)**

Analyze the movement of odors and aerosols from leachate evaporators. Demonstrate that evaporators were ineffective in reducing volume of leachate, but were release odors and VOCs to nearby homes.

- **Analysis and Control of Fugitive Dust and Odors from a Soil Blending Facility (Stockton, CA)**

Advanced computational fluid mechanics (CFD) models were used to predict the air flow and movement of fugitive dust at a soil blending facility. With this information, the client was able to install? appropriate mitigation services to mitigate off-site migration of fugitive dust. View how the movement of dust occurs at:
https://www.youtube.com/watch?v=wXEX6IT-54U

- **Review of Odor Control Systems for Cannabis Cultivation and Distribution Facilities (Palm Springs, CA)**

EPS evaluated the odor control system for over 15 different odor cultivation and distribution facilities in Palm Springs. The effectiveness of the proposed system was evaluated and recommendations were made to the City to Palm Springs.

Analysis of Public Health Risks

- **Analysis of Public Health Risks Associated with Composting Operations (Napa County, CA)**

Estimate the types and amounts of toxic air contaminants (TAC) released from green waste and food waste composting. An air dispersion model was used with local wind data to determine the concentration of each TAC. The concentration estimates were supplemented with toxicity data to quantify public health risks from exposure to the various toxic pollutants.

- **Analysis of Public Health Risks from Proposed Asphalt Plant (Kern County, California)**

Analyze emissions of any toxic air pollutants from a proposed 250 tons per day asphalt plant. Emissions from aggregate drying, propane combustion and asphalt oil were quantified. Acute and chronic public health risks from exposure to various toxic pollutants were calculated and compared with regulatory thresholds of significance.

From:	Board of Supervisors, (BOS)
To:	BOS Legislation, (BOS)
Subject:	FW: Whole Foods Application to occupy the long vacant Best Buy building in City Center
Date:	Thursday, November 12, 2020 5:21:31 PM

From: Jim Grossman <jimgrossman@sbcglobal.net>
Sent: Thursday, November 12, 2020 11:46 AM
To: Preston, Dean (BOS) <dean.preston@sfgov.org>; Fewer, Sandra (BOS) <sandra.fewer@sfgov.org>; Peskin, Aaron (BOS) <aaron.peskin@sfgov.org>; Mar, Gordon (BOS) <gordon.mar@sfgov.org>; Haney, Matt (BOS) <matt.haney@sfgov.org>; Yee, Norman (BOS) <norman.yee@sfgov.org>; raphael.mandelman@sfgov.org; Ronen, Hillary <hillary.ronen@sfgov.org>; Walton, Shamann (BOS) <shamann.walton@sfgov.org>; Safai, Ahsha (BOS) <ahsha.safai@sfgov.org>; Sandoval, Suhagey (BOS) <suhagey.sandoval@sfgov.org>; Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>; Stefani, Catherine (BOS) <catherine.stefani@sfgov.org>
Subject: Whole Foods Application to occupy the long vacant Best Buy building in City Center

Hello SF Supervisors,

I am a homeowner at 975 Baker Street in San Francisco and a Vice-President of the Anza Vista Homeowners Association and I want to strongly support the Whole Foods application to locate a store in my neighborhood. Whole Foods is planning on occupying a vacant building in the City Center Shopping Center which would be a real plus for our area and the City of SF. Vacant retail buildings are a problem for the local area as they are for the whole of SF. SF voters recently approved a measure that taxes landlords that fail to fill their vacant storefronts. Here we have a vacant building left by Best Buy that Whole Foods wants to occupy. I can't believe there would be any opposition to this plan. In fact, I believe the City of SF should be giving Whole Foods a tax incentive to fill this empty building. The City gets increased tax income, 200 new jobs for its residents, and a responsible and much needed tenant supplying food for residents. In fact, this application has already been approved by the SF Planning Commissioners so I and the homeowners I represent in the immediate neighborhood are not sure why a CEQA appeal is even applicable.

There is a Whole Foods Market at Franklin and California Streets but its parking is terrible as there are few slots and on Sundays, its almost impossible to park . As I understand it, a Church owns this lands and leases the property to Whole Foods and required Whole Foods to reserve a number of their parking spaces for church members on Sundays. This location does not work well for the residents of our neighborhood Also their is a Trader Joe's at Masonic and Geary but parking here is also terrible. Trader Joe's tells me this particular store is their busiest store in the country.

Our neighborhood strongly recommends your speedy approval for Whole Foods to occupy the vacant building at City Center Shopping Center as soon as possible. This building has sat vacant too long. (I believe its been two years now) I just hope the shopping center owners do not go

under during these Covid 19 times. Grocery stores are essential businesses.

Jim Grossman, Vice-President of the Anza Vista Neighborhood Association
975 Baker Street
San Francisco, CA 94115

From:	BOS Legislation, (BOS)
To:	Mark Wolfe; mloper@reubenlaw.com; cangelis@reubenlaw.com
Cc:	PEARSON, ANNE (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); RUIZ-ESQUIDE, ANDREA (CAT); Hillis, Rich (CPC); Teague, Corey (CPC); Sanchez, Scott (CPC); Gibson, Lisa (CPC); Jain, Devyani (CPC); Navarrete, Joy (CPC); Lewis, Don (CPC); Varat, Adam (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Ionin, Jonas (CPC); Schuett, Rachel (CPC); May, Christopher (CPC); Wietgrefe, Wade (CPC); Range, Jessica (CPC); Rosenberg, Julie (BOA); Sullivan, Katy (BOA); Longaway, Alec (BOA); BOS-Supervisors; BOS-Legislative Aides; Calvillo, Angela (BOS); Somera, Alisa (BOS); Mchugh, Eileen (BOS); BOS Legislation, (BOS)
Subject:	HEARING NOTICE: Appeal of CEQA Exemption Determination - Proposed 2675 Geary Boulevard Project - Appeal Hearing on November 17, 2020
Date:	Tuesday, November 3, 2020 8:20:34 AM
Attachments:	image001.png

Greetings,

The Office of the Clerk of the Board has scheduled a remote hearing for Special Order before the Board of Supervisors on **November 17, 2020, at 3:00 p.m**., to hear an appeal of CEQA Exemption Determination, for the proposed 2675 Geary Boulevard project.

Please find the following link to the hearing notice for the matter:

Public Hearing Notice - November 3, 2020

I invite you to review the entire matters on our Legislative Research Center by following the link below:

Board of Supervisors File No. 201127

Best regards,
Jocelyn Wong
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
T: 415.554.7702 | F: 415.554.5163
jocelyn.wong@sfgov.org | www.sfbos.org

(VIRTUAL APPOINTMENTS) To schedule a "virtual" meeting with me (on Microsoft Teams), please ask and I can answer your questions in real time.

Due to the current COVID-19 health emergency and the Shelter in Place Order, the Office of the Clerk of the Board is working remotely while providing complete access to the legislative process and our services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committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors' website or in other public documents that members of the public may inspect or copy.

BOARD of SUPERVISORS

City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689
Tel. No. 554-5184
Fax No. 554-5163
TDD/TTY No. 554-5227

NOTICE OF PUBLIC HEARING

BOARD OF SUPERVISORS OF THE CITY AND COUNTY OF SAN FRANCISCO
Sent via Email and/or U.S. Postal Service

NOTICE IS HEREBY GIVEN THAT the Board of Supervisors of the City and County of San Francisco will hold a remote public hearing to consider the following appeal and said public hearing will be held as follows, at which time all interested parties may attend and be heard:

Date: **Tuesday, November 17, 2020**

Time: **3:00 p.m.**

Location: **REMOTE MEETING VIA VIDEOCONFERENCE**
Watch: www.sfgovtv.org

Watch: **SF Cable Channel 26, 78 or 99 *(depending on your provider)* once the meeting starts, the telephone number and Meeting ID will be displayed on the screen.**

Public Comment Call-In: https://sfbos.org/remote-meeting-call

Subject: **File No. 201127.** Hearing of persons interested in or objecting to the determination of exemption from environmental review under the California Environmental Quality Act issued as a Common Sense Exemption by the Planning Department on September 11, 2020, for the proposed project at 2675 Geary Boulevard, Assessor's Parcel Block No. 1094, Lot No. 001 for a new 49,780 square-foot grocery store, a 3,320 square-foot restaurant, and a 1,190 square-foot coffee bar at the "City Center" an existing shopping center; Whole Foods Market would occupy a vacant retail space, above the existing Target store; the existing Lot C (117 parking spaces) would be available for Whole Foods customers; loading and deliveries would occur from an existing 3,528 square-foot loading dock which is accessed from O'Farrell Street just east of Anza Vista Avenue. (District 2) (Appellants: Mark Wolfe of M. R. Wolfe & Associates, P.C., on behalf of Julie Fisher, Tony Vargas, and United Food & Commercial Workers Union Local 5) (Filed September 18, 2020)

DATED ~ MAILED ~ EMAILED ~ POSTED: November 3, 2020

On March 17, 2020, the Board of Supervisors authorized their Board and Committee meetings to convene remotely and allow for remote public comment due to the Coronavirus -19 pandemic. Therefore, Board of Supervisors meetings that are held through videoconferencing will allow remote public comment. Visit the SFGovTV website (www.sfgovtv.org) to stream the live meetings or watch them on demand.

PUBLIC COMMENT CALL-IN
WATCH: SF Cable Channel 26, 78 or 99 *(depending on your provider)* once the meeting starts, the telephone number and Meeting ID will be displayed on the screen; or
VISIT: https://sfbos.org/remote-meeting-call

Please visit the Board's website (https://sfbos.org/city-board-response-covid-19) regularly to be updated on the City's response to COVID-19 and how the legislative process may be impacted.

In accordance with Administrative Code, Section 67.7-1, persons who are unable to attend the hearing on this matter may submit written comments prior to the time the hearing begins. These comments will be made as part of the official public record in this matter and shall be brought to the attention of the Board of Supervisors. Written comments should be addressed to Angela Calvillo, Clerk of the Board, City Hall, 1 Dr. Carlton B. Goodlett Place, Room 244, San Francisco, CA, 94102 or sent via email (board.of.supervisors@sfgov.org). Information relating to this matter is available in the Office of the Clerk of the Board or the Board of Supervisors' Legislative Research Center (https://sfbos.org/legislative-research-center-lrc). Agenda information relating to this matter will be available for public review on Friday, November 13, 2020.

For any questions about this hearing, please contact one of the Legislative Clerks:

Lisa Lew (lisa.lew@sfgov.org ~ (415) 554-7718)
Jocelyn Wong (jocelyn.wong@sfgov.org ~ (415) 554-7702)

Please Note: *The Department is open for business, but employees are working from home. Please allow 48 hours for us to return your call or email.*

Angela Calvillo
Clerk of the Board of Supervisors
City and County of San Francisco

jw:ll:ams

DATED ~ MAILED ~ EMAILED ~ POSTED: November 3, 2020

BOARD of SUPERVISORS

City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco 94102-4689
Tel. No. 554-5184
Fax No. 554-5163
TDD/TTY No. 554-5227

PROOF OF MAILING

Legislative File No. 201127

Description of Items: Hearing - Appeal of Determination of Exemption From Environmental Review - Proposed 2675 Geary Boulevard Project - 2 Notices Mailed

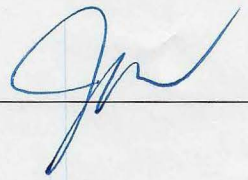
I, Jocelyn Wong , an employee of the City and County of San Francisco, mailed the above described document(s) by depositing the sealed items with the United States Postal Service (USPS) with the postage fully prepaid as follows:

Date: October 30, 2020

Time: 10:15 a.m.

USPS Location: Repro Pick-up Box in Building Management's Office (Rm 8)

Mailbox/Mailslot Pick-Up Times (if applicable): N/A

Signature: 

Instructions: Upon completion, original must be filed in the above referenced file.

From:	BOS Legislation, (BOS)
To:	Ko, Yvonne (CPC); Yeung, Tony (CPC)
Cc:	BOS-Operations; BOS Legislation, (BOS)
Subject:	CHECK PICKUP: Appeal of CEQA Exemption Determinations - Proposed 2675 Geary Boulevard - Appeal Hearing on November 17, 2020
Date:	Thursday, October 15, 2020 11:18:49 AM
Attachments:	image001.png Appeal Check Pickup.doc

Hi Yvonne,

The checks for the appeal filing fee for the CEQA Exemption Determination appeal of the proposed 2675 Geary Boulevard project, are ready to be picked up at the Clerk's Office. Please coordinate with our BOS-Operations team, copied here, to set up a date and time for pickup. A fee waiver was not filed with this project.

Ops,
Check Nos. 2323 ($640) and 2328 ($25) should be in your possession currently. Please have Planning sign the attached pick up form and scan it back to the leg clerks when completed. Thank you!

Best regards,

Jocelyn Wong
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
T: 415.554.7702 | F: 415.554.5163
jocelyn.wong@sfgov.org | www.sfbos.org

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From: BOS Legislation, (BOS) <bos.legislation@sfgov.org>
Sent: Wednesday, September 30, 2020 3:28 PM
To: Mark Wolfe <mrw@mrwolfeassociates.com>; mloper@reubenlaw.com; cangelis@reubenlaw.com
Cc: PEARSON, ANNE (CAT) <Anne.Pearson@sfcityatty.org>; STACY, KATE (CAT) <Kate.Stacy@sfcityatty.org>; JENSEN, KRISTEN (CAT) <Kristen.Jensen@sfcityatty.org>; RUIZ-ESQUIDE, ANDREA (CAT) <Andrea.Ruiz-Esquide@sfcityatty.org>; Hillis, Rich (CPC) <rich.hillis@sfgov.org>; Teague, Corey (CPC) <corey.teague@sfgov.org>; Sanchez, Scott (CPC) <scott.sanchez@sfgov.org>; Gibson, Lisa (CPC) <lisa.gibson@sfgov.org>; Jain, Devyani (CPC) <devyani.jain@sfgov.org>; Navarrete, Joy (CPC) <joy.navarrete@sfgov.org>; Lewis, Don (CPC) <don.lewis@sfgov.org>; Varat, Adam (CPC) <adam.varat@sfgov.org>; Sider, Dan (CPC) <dan.sider@sfgov.org>; Starr, Aaron (CPC) <aaron.starr@sfgov.org>; Ionin, Jonas (CPC) <jonas.ionin@sfgov.org>; Schuett, Rachel (CPC) <rachel.schuett@sfgov.org>; May, Christopher (CPC) <christopher.may@sfgov.org>; Wietgrefe, Wade (CPC) <wade.wietgrefe@sfgov.org>; Rosenberg, Julie (BOA) <julie.rosenberg@sfgov.org>; Sullivan, Katy (BOA) <katy.sullivan@sfgov.org>; Longaway, Alec (BOA) <alec.longaway@sfgov.org>; BOS-Supervisors <bos-supervisors@sfgov.org>; BOS-Legislative Aides <bos-legislative_aides@sfgov.org>; Calvillo, Angela (BOS) <angela.calvillo@sfgov.org>; Somera, Alisa (BOS) <alisa.somera@sfgov.org>; Mchugh, Eileen (BOS) <eileen.e.mchugh@sfgov.org>; BOS Legislation, (BOS) <bos.legislation@sfgov.org>
Subject: Appeal of CEQA Exemption Determinations - Proposed 2675 Geary Boulevard - Appeal Hearing on November 17, 2020

Greetings,

The Office of the Clerk of the Board has scheduled for a remote hearing Special Order before the Board of Supervisors on November 17, 2020, at 3:00 p.m. Please find linked below a letter of appeal regarding the proposed 2675 Geary Boulevard project, as well as direct links to the Planning Department's timely filing determination, and an informational letter from the Clerk of the Board.

Appeal Letter - September 18, 2020
Planning Department Memo - September 29, 2020
Clerk of the Board Letter - September 30, 2020

I invite you to review the entire matters on our Legislative Research Center by following the link below:

Board of Supervisors File No. 201127

Best regards,

Jocelyn Wong
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244

San Francisco, CA 94102
T: 415.554.7702 | F: 415.554.5163
jocelyn.wong@sfgov.org | www.sfbos.org

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San Francisco 94102-4689
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TDD/TTY No. 554-5227

October 14, 2020

File No. 201127
Planning Case No. 2019-004110ENV

Received from the Board of Supervisors Clerk's Office two checks, one in the amount of Six Hundred Forty Dollars ($640) and one in the amount of Twenty Five Dollars ($25) representing the filing fee paid by M.R. Wolfe & Associates, P.C. for the appeal of the Exemption Determination under CEQA for the proposed 2675 Geary Boulevard project:

Planning Department
By:

Tony Yeung
Print Name

10/15/20
Signature and Date

From:	BOS Legislation, (BOS)
To:	Mark Wolfe; mloper@reubenlaw.com; cangelis@reubenlaw.com
Cc:	PEARSON, ANNE (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); RUIZ-ESQUIDE, ANDREA (CAT); Hillis, Rich (CPC); Teague, Corey (CPC); Sanchez, Scott (CPC); Gibson, Lisa (CPC); Jain, Devyani (CPC); Navarrete, Joy (CPC); Lewis, Don (CPC); Varat, Adam (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Ionin, Jonas (CPC); Schuett, Rachel (CPC); May, Christopher (CPC); Wietgrefe, Wade (CPC); Rosenberg, Julie (BOA); Sullivan, Katy (BOA); Longaway, Alec (BOA); BOS-Supervisors; BOS-Legislative Aides; Calvillo, Angela (BOS); Somera, Alisa (BOS); Mchugh, Eileen (BOS); BOS Legislation, (BOS)
Subject:	Appeal of CEQA Exemption Determinations - Proposed 2675 Geary Boulevard - Appeal Hearing on November 17, 2020
Date:	Wednesday, September 30, 2020 3:27:44 PM
Attachments:	image001.png

Greetings,

The Office of the Clerk of the Board has scheduled for a remote hearing Special Order before the Board of Supervisors on November 17, 2020, at 3:00 p.m. Please find linked below a letter of appeal regarding the proposed 2675 Geary Boulevard project, as well as direct links to the Planning Department's timely filing determination, and an informational letter from the Clerk of the Board.

Appeal Letter - September 18, 2020
Planning Department Memo - September 29, 2020
Clerk of the Board Letter - September 30, 2020

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Board of Supervisors File No. 201127

Best regards,

Jocelyn Wong
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
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(VIRTUAL APPOINTMENTS) To schedule a "virtual" meeting with me (on Microsoft Teams), please ask and I can answer your questions in real time.

Due to the current COVID-19 health emergency and the Shelter in Place Order, the Office of the Clerk of the Board is working remotely while providing complete access to the legislative process and our services


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the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors' website or in other public documents that members of the public may inspect or copy.

BOARD of SUPERVISORS

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Tel. No. 554-5184
Fax No. 554-5163
TDD/TTY No. 554-5227

September 30, 2020

Mark Wolfe
M. R. Wolfe & Associates, P.C.
580 California Street, Suite 1200
San Francisco, CA 94104

Subject: File No. 201127 - Appeal of California Environmental Quality Act (CEQA) Determination of Exemption from Environmental Review - Proposed 2675 Geary Boulevard Project

Dear Mr. Wolfe:

The Office of the Clerk of the Board is in receipt of a memorandum dated September 29, 2020, from the Planning Department regarding their determination on the timely filing of appeal of the Common Sense Exemption Determination issued by the Planning Department under CEQA for the proposed 2675 Geary Boulevard project.

The Planning Department has determined that the appeal was filed in a timely manner (copy attached).

Pursuant to Administrative Code, Section 31.16, a remote hearing date has been scheduled for **Tuesday, November 17, 2020, at 3:00 p.m.**, at the Board of Supervisors meeting.

Please provide to the Clerk's Office by noon:

20 days prior to the hearing: *Wednesday, October 28, 2020*	names and addresses of interested parties to be notified of the hearing, in spreadsheet format; and
11 days prior to the hearing: *Friday, November 6, 2020*	any documentation which you may want available to the Board members prior to the hearing.

For the above, the Clerk's office requests electronic files be sent to bos.legislation@sfgov.org.

If you have any questions, please feel free to contact Legislative Clerks Lisa Lew at (415) 554-7718, Jocelyn Wong at (415) 554-7702, or Brent Jalipa at (415) 554 7712.

Very truly yours,

Angela Calvillo
Clerk of the Board

ll:jw:ams

c: Mark Loper, Reuben, Junius & Rose, LLP, Project Sponsor
Anne Pearson, Deputy City Attorney
Kate Stacy, Deputy City Attorney
Kristen Jensen, Deputy City Attorney
Andrea Ruiz-Esquide, Deputy City Attorney
Rich Hillis, Director, Planning Department
Corey Teague, Zoning Administrator, Planning Department
Scott Sanchez, Acting Deputy Zoning Administrator, Planning Department
Lisa Gibson, Environmental Review Officer, Planning Department
Devyani Jain, Deputy Environmental Review Officer, Planning Department
Joy Navarette, Environmental Planning, Planning Department
Don Lewis, Environmental Planning, Planning Department
Adam Varat, Acting Director of Citywide Planning, Planning Department
Dan Sider, Director of Executive Programs, Planning Department
Aaron Starr, Manager of Legislative Affairs, Planning Department
Jonas Ionin, Planning Commission Secretary, Planning Department
Rachel Schuett, Staff Contact, Planning Department
Christopher May, Staff Contact, Planning Department
Wade Wiefergate, Staff Contact, Planning Department
Julie Rosenberg, Executive Director, Board of Appeals
Katy Sullivan, Legal Assistant, Board of Appeals
Alec Longaway, Legal Process Clerk, Board of Appeals

San Francisco Planning

1650 MISSION STREET, SUITE 400
SAN FRANCISCO, CA 94103
SFPLANNING.ORG / 415.575.9010

Common Sense Exemption Appeal Timeliness Determination

DATE: **September 29, 2020**

TO: **Angela Calvillo, Clerk of the Board of Supervisors**

FROM: **Lisa Gibson, Environmental Review Officer – (628) 652-7571**

RE: **Appeal Timeliness Determination –2675 Geary Boulevard Common Sense Exemption; Planning Department Case No. 2019-004110ENV**

On September 18, 2020, M.R. Wolfe & Associates, P.C. on behalf of San Francisco residents Julie Fisher and Tony Vargas, and United Food & Commercial Workers Union (UFCW) Local 5, and its members who live and/or work in San Francisco filed an appeal with the Office of the Clerk of the Board of Supervisors of the common sense exemption determination for the 2675 Geary Boulevard project. As explained below, the appeal is timely.

Date of Exemption Posting	30 Days after Exemption Posting	Appeal Deadline (Must Be Day Clerk of Board's Office Is Open)	Date of Appeal Filing	Timely?
Friday, September 11, 2020	Sunday, October 11, 2020	Tuesday October 13, 2020	Friday, September 18, 2020	Yes

Approval Action: On May 14, 2020, the Planning Department issued a Categorical Exemption for the proposed project. The Approval Action for the project was the issuance of a Conditional Use Authorization pursuant to Planning Code sections 303, 303.1 and 712 to permit a Formula Retail use (d.b.a. Whole Foods Market) within a NC-3 (Moderate-Scale Neighborhood Commercial) Zoning District. The Planning Commission held a discretionary review hearing and approved the project which occurred on June 25, 2020 (Date of the Approval Action).

Exemption Posting: On September 4, 2020 the Planning Department rescinded the (May 14, 2020) Class 32 Categorical Exemption. On September 11, 2020 the Planning

Department issued and posted the Common Sense Exemption for the project on the Planning Department's website (Date of the Exemption Posting).

Appeal Deadline: Sections 31.16(a) and (e) of the San Francisco Administrative Code state that any person or entity may appeal an exemption determination to the Board of Supervisors during the time period beginning with the date of the exemption determination and ending 30 days after the Date of the Approval Action. Here, the rescinding of the Class 32 Categorical Exemption and the issuance of the Common Sense Exemption did not invalidate the project approvals; thus, no subsequent Approval Action was required. As a result, per San Francisco Administrative Code Section 31.16 (e)(2)(B)(ii), the appeal period begins with the date the exemption determination is posted or noticed and ends 30 days after the first date that the Planning Department posted notice of the exemption on the Planning Department's website. The 30th day after the date of the Exemption Posting is Sunday, October 11, 2020. The next day when the Office of the Clerk of the Board of Supervisors is open is Tuesday, October 13, 2020 (Appeal Deadline).

Appeal Filing and Timeliness: The Appellant filed the appeal of the exemption determination on Friday, September 18, 2020, prior to the appeal deadline. Therefore, the appeal is considered timely.

From:	BOS Legislation, (BOS)
To:	Hillis, Rich (CPC)
Cc:	PEARSON, ANNE (CAT); STACY, KATE (CAT); JENSEN, KRISTEN (CAT); RUIZ-ESQUIDE, ANDREA (CAT); Teague, Corey (CPC); Sanchez, Scott (CPC); Gibson, Lisa (CPC); Jain, Devyani (CPC); Navarrete, Joy (CPC); Lewis, Don (CPC); Varat, Adam (CPC); Sider, Dan (CPC); Starr, Aaron (CPC); Ionin, Jonas (CPC); Lynch, Laura (CPC); Schuett, Rachel (CPC); Rosenberg, Julie (BOA); Sullivan, Katy (BOA); Longaway, Alec (BOA); BOS-Supervisors; BOS-Legislative Aides; Calvillo, Angela (BOS); Somera, Alisa (BOS); Mchugh, Eileen (BOS); BOS Legislation, (BOS)
Subject:	Appeal of CEQA Exemption Determination - Proposed 2675 Geary Boulevard Project - Timeliness Determination
Date:	Thursday, September 24, 2020 8:31:30 AM
Attachments:	image001.png COB Ltr 092320.pdf Appeal Ltr 091820.pdf

Dear Director Hillis,

The Office of the Clerk of the Board is in receipt of an appeal of the Common Sense Exemption Determination for the proposed 2675 Geary Boulevard project. The appeal was filed by Mark Wolfe of M. R. Wolfe & Associates, P.C., on behalf of Julie Fisher, Tony Vargas, and United Food & Commercial Workers Union Local 5.

Please find the attached letter of appeal and timely filing determination request letter from the Clerk of the Board. Kindly review for timely filing determination. Thank you.

Regards,

Lisa Lew
San Francisco Board of Supervisors
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San Francisco, CA 94102
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lisa.lew@sfgov.org | www.sfbos.org

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September 23, 2020

To: Rich Hillis
Planning Director

From: Angela Calvillo
Clerk of the Board of Supervisors

Subject: Appeal of California Environmental Quality Act (CEQA) Determination of Exemption from Environmental Review - 2675 Geary Boulevard

An appeal of the CEQA Determinations of Exemption from Environmental Review for the proposed 2675 Geary Boulevard project was filed with the Office of the Clerk of the Board on September 18, 2020, by Mark Wolfe of M. R. Wolfe & Associates, P.C., on behalf of Julie Fisher, Tony Vargas, and United Food & Commercial Workers Union Local 5.

Pursuant to Administrative Code, Chapter 31.16, I am forwarding this appeal, with attached documents, to the Planning Department to determine if the appeal has been filed in a timely manner.

If you have any questions, please feel free to contact Legislative Clerks Lisa Lew at (415) 554-7718, Jocelyn Wong at (415) 554-7702 or Brent Jalipa at (415) 554-7712.

c: Anne Pearson, Deputy City Attorney
Kate Stacy, Deputy City Attorney
Kristen Jensen, Deputy City Attorney
Andrea Ruiz-Esquide, Deputy City Attorney
Corey Teague, Zoning Administrator, Planning Department
Scott Sanchez, Acting Deputy Zoning Administrator, Planning Department
Lisa Gibson, Environmental Review Officer, Planning Department
Devyani Jain, Deputy Environmental Review Officer, Planning Department
Joy Navarette, Environmental Planning, Planning Department
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Jonas Ionin, Planning Commission Secretary, Planning Department
Laura Lynch, Staff Contact, Planning Department
Rachel Schuett, Staff Contact, Planning Department
Julie Rosenberg, Executive Director, Board of Appeals
Katy Sullivan, Legal Assistant, Board of Appeals
Alec Longaway, Legal Process Clerk, Board of Appeals

jw:ll:ams

Print Form

Introduction Form

By a Member of the Board of Supervisors or the Mayor

Time stamp
or meeting date

I hereby submit the following item for introduction (select only one):

☐ 1. For reference to Committee. (An Ordinance, Resolution, Motion, or Charter Amendment)

☐ 2. Request for next printed agenda Without Reference to Committee.

☒ 3. Request for hearing on a subject matter at Committee.

☐ 4. Request for letter beginning "Supervisor _____ inquires"

☐ 5. City Attorney request.

☐ 6. Call File No. _____ from Committee.

☐ 7. Budget Analyst request (attach written motion).

☐ 8. Substitute Legislation File No. _____

☐ 9. Reactivate File No. _____

☐ 10. Question(s) submitted for Mayoral Appearance before the BOS on _____

Please check the appropriate boxes. The proposed legislation should be forwarded to the following:

☐ Small Business Commission ☐ Youth Commission ☐ Ethics Commission

☐ Planning Commission ☐ Building Inspection Commission

Note: For the Imperative Agenda (a resolution not on the printed agenda), use a Imperative Form.

Sponsor(s):

Clerk of the Board

Subject:

Hearing - Appeal of Determination of Exemption From Environmental Review - Proposed 2675 Geary Boulevard Project

The text is listed below or attached:

Hearing of persons interested in or objecting to the determination of exemption from environmental review under the California Environmental Quality Act issued as a Common Sense Exemption by the Planning Department on September 11, 2020, for the proposed project at 2675 Geary Boulevard, Assessor's Parcel Block No. 1094, Lot No. 001 for a new 49,780 square-foot grocery store, a 3,320 square-foot restaurant, and a 1,190 square-foot coffee bar at the "City Center" an existing shopping center; Whole Foods Market would occupy a vacant retail space, above the existing Target store; the existing Lot C (117 parking spaces) would be available for Whole Foods customers; loading and deliveries would occur from an existing 3,528 square-foot loading dock which is accessed from O'Farrell Street just east of Anza Vista Avenue. (District 2) (Appellants: Mark Wolfe of M. R. Wolfe & Associates, P.C., on behalf of Julie Fisher, Tony Vargas, and United Food & Commercial Workers Union Local 5) (Filed September 18, 2020)

Signature of Sponsoring Supervisor: _____

For Clerk's Use Only: