



SAN FRANCISCO PLANNING DEPARTMENT

Addendum to Mitigated Negative Declaration

Addendum Date: March 7, 2016
Case No.: **2011.0408E**
Project Title: **320-400 Paul Avenue Internet Services Exchange**
2011.0408E, adopted July 24, 2014
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Background

In 2014, the San Francisco Planning Commission adopted the 320-400 Paul Avenue Internet Services Exchange (ISE) Final Mitigated Negative Declaration (MND). The project analyzed in the MND was the construction of an ISE facility on two parcels totaling 319,900 square feet (sf) at 320-400 Paul Avenue and installation of underground electrical distribution circuits between the ISE facility and the Pacific Gas and Electric (PG&E) Martin Service Center in Brisbane. The planned improvements at the ISE facility included the renovation of the front two buildings (320 and 350 Paul Avenue) for administrative uses and the demolition and replacement of the 95,000 sf rear building (400 Paul Avenue) with a two-story, 187,000 sf data center building. The project included approximately 80 vehicle parking spaces in three parking areas located at: 1) the front of the site along Paul Avenue; 2) along the access road on the eastern edge of the property; and, 3) at the rear of the proposed new building. The rear portion of the parcel was to be converted from an asphalt paved area to a pervious, green landscaped area. Of the site's existing 35 trees, 25 trees would be retained based on their health and suitability for retention and approximately 19 additional trees were to be planted along the Paul Avenue frontage and front parking lot.

Demolition of the existing building and construction of the proposed ISE data center was anticipated to include excavation of up to 5 feet below ground surface to install the building foundation. Construction activities were expected to last 12 months and be completed in phases. Off-hauling of demolition debris and excavated soil (an estimated 1,000 cubic yards) would be limited in duration. The average construction-related truck trips were estimated to be 7 trips per day, with a maximum of 24 trips during the peak construction period.

Proposed Modifications to the Project

Project design review by the San Francisco Public Utilities Commission (SFPUC) and unanticipated conditions encountered during demolition of the existing building foundations and slab have resulted in several modifications to the original project. The SFPUC requires that the project include bioswales¹ at the

¹ Bioswales, or vegetated swales, are landscape elements designed to remove silt and pollution from surface runoff water, attenuate flooding potential, or convey stormwater away from critical infrastructure. They consist of a

rear and sides of the parcel to contain stormwater runoff from the site. This modification will result in additional soil excavation to construct these stormwater retention facilities. In addition, the existing building foundations were deeper than anticipated; therefore, removal of the existing building foundation and concrete slab resulted in excess site spoils. Approximately 16,000 cubic yards of additional spoils are expected to be generated during the demolition and excavation phase of construction than originally anticipated due to the bioswales and foundation conditions. Off-hauling of these additional spoils would require approximately 1,500 to 1,600 additional truck trips.

To accommodate the bioswale requirement and reduce the offsite hauling of spoils, the following project modifications are proposed:

- Construction of nine bioswales ranging in size from 312 to 4,500 sf of base functional area, totaling approximately 13,700 sf. Bioswales would include 18 inches of treatment soil and 12 inches of Class 2 permeable material² beneath the base of each unit. Bioswales would be sloped to facilitate gravity drainage to the treatment surface at a maximum slope of 3:1 (horizontal:vertical).
- Retention of excess spoils on-site to the extent feasible by spreading spoils and raising the grade 12 inches beneath the new data center building (400 Paul Avenue building), the generator yard, and the area around the building. This would increase the building height from 55.5 feet to 56.5 feet, which is within the allowable building height limit of 65 feet. No other changes to the building are proposed.
- Increasing the thickness of the basement concrete floor for the building at 350 Paul Avenue by two inches to align the floors with the 400 Paul Avenue building. All other floor and roof levels would be unchanged.
- Removal of the parking spaces along the eastern edge of the parcel, and reconfiguration of the parking areas fronting Paul Avenue and at the rear of the proposed 400 Paul Avenue building; and,
- Alteration of the tree planting scheme to retain a mature Honey Locust tree near the front parking area, remove two small-diameter Honey Locust trees, and plant approximately 60 more trees than originally proposed (the original project included 19 new trees).

Figure 1 presents the original project site plan depicted in the FMND; **Figure 2** shows the proposed, modified site plan.

Retaining spoils onsite would reduce the amount of off-hauling of excess spoils by about half, which would still require off-hauling approximately 8,000 cubic yards of material, as compared with 1,000 cubic yards estimated in the MND. This would correspond to a total of about 800 haul trucks, or approximately 20 round-trip truck trips per day for approximately 40 working days (or about 2 months). In addition to reducing the amount of spoils requiring disposal, the proposed modifications would provide better drainage around the proposed building and reduce the grade changes on access routes around the property.

gently sloped drainage course filled with vegetation, compost and/or riprap. Where soils are poorly drained, under-drain systems may be used to attenuate peak flows and filter water before continuing downstream.

² Class 2 permeable material must comply with the percentage composition and gradation requirements specified in Caltrans Standard Specifications Section 68-2.02F(3) regarding subsurface drains.

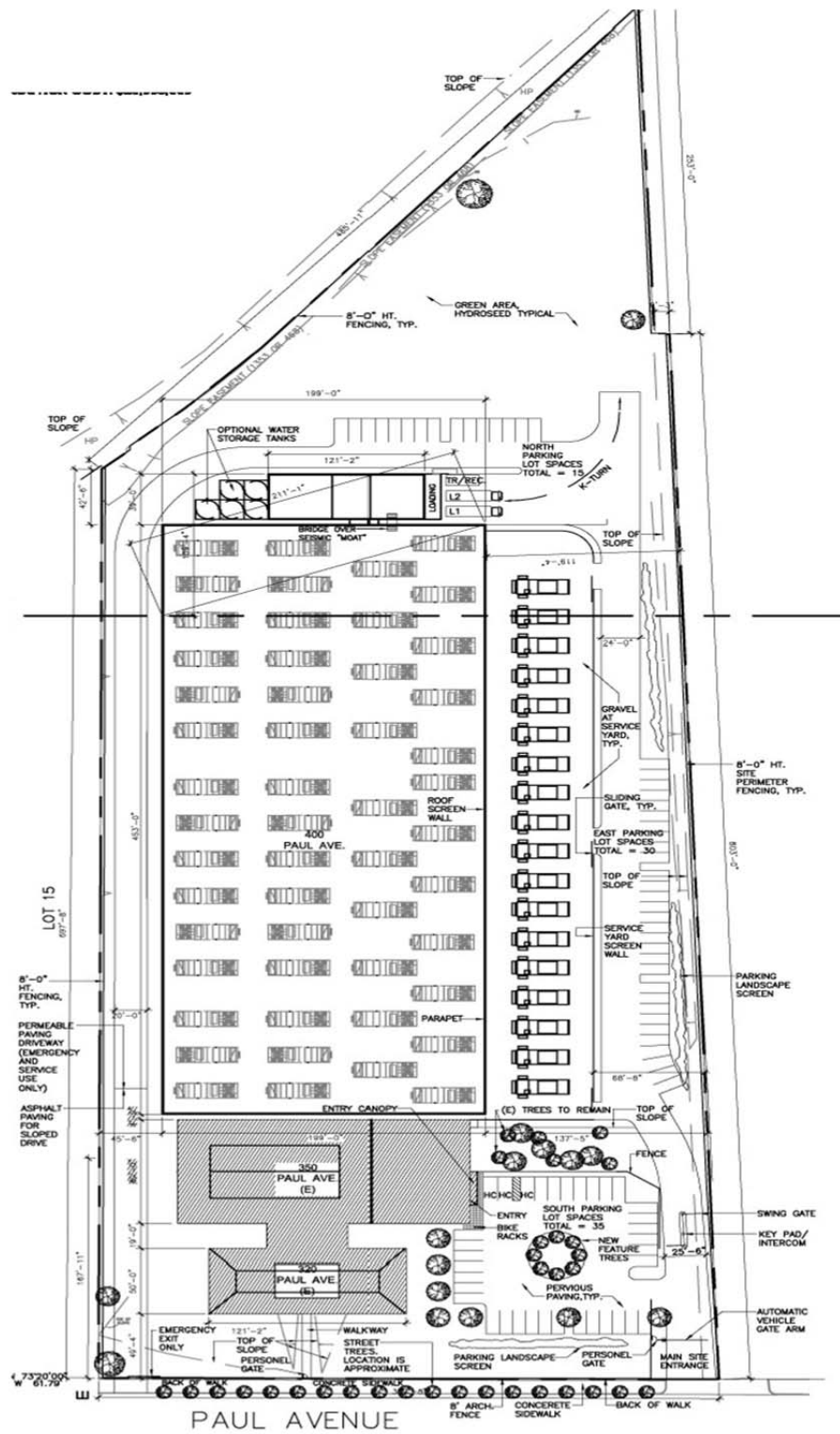


Figure 1. Original Project Site Plan

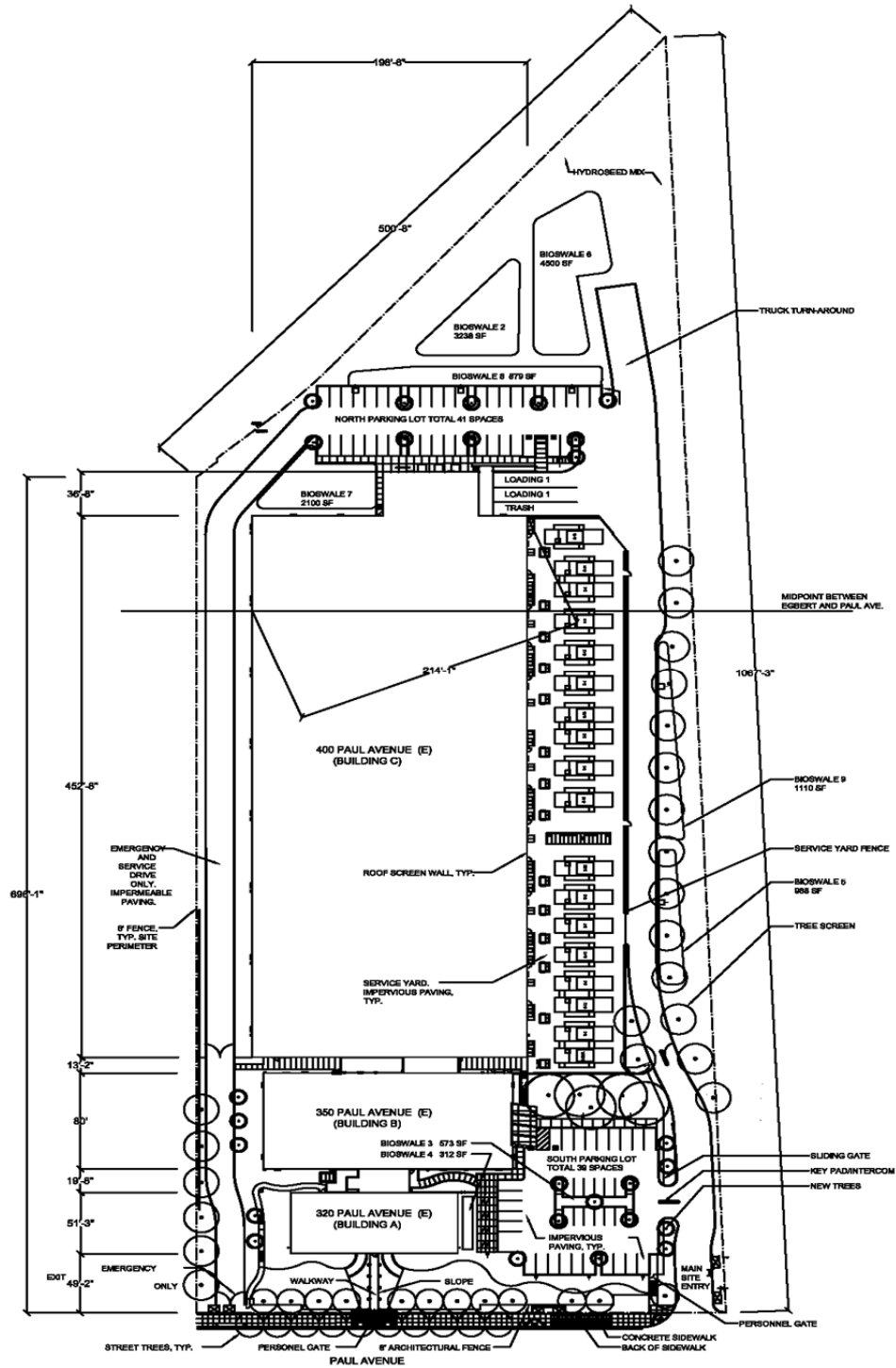


Figure 2. Modified Project Site Plan

The Modified Project would require drip irrigation for all trees, shrubs, and the bioswale areas. Irrigation controllers would provide irrigation as needed and plant species would be selected to minimize the need for long-term irrigation.

Section 31.19(c)(1) of the San Francisco Administrative Code states that a modified project must be reevaluated and that, "If, on the basis of such reevaluation, the Environmental Review Officer determines, based on the requirements of the California Environmental Quality Act, that no additional environmental review is necessary, this determination and the reasons therefore shall be noted in writing in the case record, and no further evaluation shall be required by this Chapter." This Addendum to the MND for the 320-400 Paul Avenue project documents the environmental effects of the Modified Project and concludes that the Modified Project would not result in any new significant impacts not identified in the MND and no new mitigation measures would be necessary.

Analysis of Potential Environmental Effects

The MND found that the project would result in impacts that were either less than significant or less than significant with mitigation. As described above, the Modified Project proposes changes to the site drainage, parking configuration, landscaping, and a one foot increase in the height of the data center building. Taking into account these changes, the Modified Project would have similar effects as the original project.

As described further below, the Modified Project would not result in new or different environmental impacts, substantially increase the severity of the previously identified environmental impacts, nor require new mitigation measures, and no new information has emerged that would materially change the analyses or conclusions set forth in the MND. Therefore, the Modified Project would not change the analysis or conclusions reached in the MND.

Aesthetics. The MND found that the project would have less-than-significant effects on scenic vistas, scenic resources, and the existing visual character of the site and its surroundings. The Modified Project would retain 24 of the existing 35 trees (one less tree than originally proposed); however, it would remove two smaller trees in lieu of removing a mature, large-diameter tree in the parking area. In addition, the Modified Project would plant approximately 60 more trees around the project site than the original project, resulting in a total of 80 new trees. As shown on Figure 2, the proposed trees would be located along Paul Avenue, the east and western property boundaries, and within the rear parking lot. The proposed trees would provide screening of the new data center building and adjacent generator service yard. The one foot height increase of the new data center building at 400 Paul Avenue would be imperceptible from Paul Avenue due to its distance from the street, the presence of two intervening buildings, and the proposed trees. The new bioswales would be vegetated in a similar fashion to the landscaped areas proposed in the original project and would not appear markedly different. The Modified Project's impacts on aesthetics would remain less than significant.

Cultural and Paleontological Resources. The MND found that the project would have a less-than-significant effect on historic resources. The 320 Paul Avenue office building was determined to be a historic resource under California Register Criterion 3 due to its age and architectural features; no

changes are proposed to this building under the Modified Project. The buildings at 350 and 400 Paul Avenue were determined to be ineligible for the California Register, nor are they part of a historic district, and therefore, are not historic resources. The one foot height increase of the new data center building at 400 Paul Avenue would be imperceptible from Paul Avenue and would have no effect on the 320 Paul Avenue building's eligibility as a historic resource. Accordingly, the proposed modifications to the basement floor level of 350 Paul Avenue building under the Modified Project would not result in any significant historic resource impacts.

The MND found that the project would have less-than-significant effects with mitigation on archaeological resources and human remains. While the Modified Project would include increased excavation for building foundations and bioswales, the potential effects on archaeological resources and human remains would be the same as the original project and would be reduced to a less-than-significant level with implementation of **Mitigation Measure M-CP-2, Archaeological Testing Plan**.

Transportation and Circulation. The MND found that the project would have less-than-significant effects on transportation and circulation. Construction activities for the original project were expected to last 12 months, with an average of 7 daily construction-related truck trips and a maximum of 24 daily trips during the peak construction period. The Modified Project would result in approximately 800 two-way truck trips for the off-hauling of about 8,000 cubic yards of excess soil and crushed demolition debris, or approximately 20 truck trips per day for about 8 weeks. Given that the daily truck trips associated with the additional spoils disposal would be within the maximum daily truck trips estimated in the MND, the construction traffic impacts of the Modified Project on the transportation system would remain less than significant.

The Modified Project would result in no changes to operational trip generation; therefore, it would not affect the MND analysis of the original project operations related to transportation and circulation.

Noise. The MND found that the project would have less-than-significant impacts related to noise. The Modified Project would extend the duration of temporary, noise-generating construction activities associated with the use of construction equipment and vehicles for the excavation, crushing, loading and off-hauling of soil and demolition debris. Construction noise would remain within the noise levels established in the San Francisco Noise Ordinance and the noise impacts of the Modified Project would be less than significant.

The Modified Project would have no change on the project's noise operations; therefore, it would not affect the MND noise analysis of the original project.

Air Quality. The MND found that the project's construction air quality impacts from fugitive dust and criteria air pollutants would be less than significant. The Modified Project construction activities would continue to be performed in accordance with the project's Dust Control Plan, as required by the San Francisco Dust Control Ordinance and approved by the San Francisco Department of Public Health prior to project construction. The original project's construction related-emissions were well below the criteria air pollutant thresholds of significance identified in the Bay Area Air Quality Management District's (BAAQMD's) CEQA Air Quality Guidelines (as shown in Table 1). The Modified Project would increase

construction activity, and associated construction emissions, at the site by requiring additional off-hauling of spoils and construction vehicle activity onsite for the reuse of approximately half of the additional spoils generated by the Modified Project. However, the Modified Project’s daily off-haul truck trips would remain within the maximum daily trips estimated in the MND. Additionally, as discussed below, off-road vehicles and equipment would be required to adhere to **Mitigation Measure M-AQ-2, Construction Emissions Minimization**, which would further limit emissions of construction vehicles and equipment onsite. Therefore, construction emissions resulting from the Modified Project would not be substantially more severe or cause an exceedance of the thresholds shown in Table 1 and the Modified Project’s construction effects related to dust and criteria air pollutants would remain less than significant.

Table 1

Criteria Air Pollutant	Average Daily Emissions (lbs/day)	
	Project Generated (Original Project)	Construction Threshold
NO _x	44.5	54
ROG	17.1	54
PM _{2.5} /PM ₁₀	5.1	54 / 82

Note: This table includes both the construction of the 320-400 Paul Avenue ISE facility and the distribution circuits averaged over their respective construction periods.

The MND found that the project’s construction activities would generate toxic air contaminants (TACs), including diesel particulate matter (DPM), which would expose sensitive receptors to substantial pollutant concentrations and that this impact would be reduced to a less-than-significant level with implementation of **Mitigation Measure M-AQ-2, Construction Emissions Minimization**. As discussed in the MND, the temporary and variable nature of construction activities do not lend themselves to assessment of long-term health risks. However, because the project site is located within an Air Pollutant Exposure Zone where the population is already at a higher risk for long-term health effects from existing sources of air pollution, Mitigation Measure M-AQ-2 is applied to reduce this impact. This measure requires that all off-road equipment have engines that meet or exceed the California Air Resources Board (CARB) Tier 2 off-road emissions standards and are retrofitted with CARB Level 3 Verified Diesel Emissions Control Strategy, unless otherwise approved. This measure also requires that idling time for off-road and on-road equipment be limited to no more than two minutes, or as allowable by state regulations, and the construction operators properly maintain and tune equipment. With compliance with these mitigation requirements, the Modified Project’s construction air quality impact related to TACs and DPM would remain less than significant.

The Modified Project would not change the original project operations with respect to air quality impacts. The original project includes Improvement Measure IM-AQ-3b, Trees for Improving Air Quality, and proposed to plant 19 new trees for both general landscaping and improving air quality. Under the Modified Project, approximately 60 additional trees would be planted.

The MND found the proposed ISE facility would not generate substantial objectionable odors and; therefore, the project’s odor impacts would be less than significant. The Modified Project includes the

operation of bioswales on the subject site for stormwater control. The bioswales would collect stormwater runoff seasonally in channels or small ponds, which would drain into the subsurface and to under-drains that would convey excess stormwater to the City's sewer system. The stormwater would not produce odors, nor would standing water (which over time could become odorous) accumulate in the bioswales. Therefore, the Modified Project's impact related to odors would remain less than significant.

Greenhouse Gases. The MND found the project would have a less-than-significant effect on greenhouse gas emissions. The proposed changes to the project would not result in any new or substantially more severe effects due to greenhouse gas emissions.

Utilities and Service Systems. The MND found that the project would have less-than-significant effects related to wastewater and stormwater facilities. Project-related wastewater and stormwater would flow into San Francisco's combined stormwater and sewer system. With respect to stormwater, the original project proposed to reduce the impervious surfaces on the site by removing pavement and hydroseeding the rear portion of the parcel and using permeable asphalt paving for the parking spaces and areas along the west side of the property. The project must comply with the San Francisco Stormwater Design Guidelines, which describe the requirements for stormwater management pursuant to the Stormwater Management Ordinance. In accordance with these requirements, the project sponsor submitted a permit application to the SFPUC for review of its stormwater plan. The SFPUC required modifications to the original project's stormwater design to include onsite bioswales, as described in the *Proposed Modifications to the Project* above. The construction of these stormwater drainage facilities are part of the Modified Project analyzed in this Addendum. The proposed bioretention areas would reduce the rate of stormwater runoff by detaining stormwater flows prior to discharge to the City's combined sewer system. With compliance with the Stormwater Management Ordinance, the Modified Project would have a less-than-significant impact on San Francisco's wastewater and stormwater systems.

The MND found that the SFPUC has sufficient water supply and entitlements to serve the project and the project would have a less-than-significant effect on water supply. As discussed in the MND, the original project was estimated to use up to 2.5 million gallons of water per year, which was within the demand for water supply considered in the SFPUC's 2013 Water Availability Study. The Modified Project would increase water use to some degree because irrigation of the landscaping and bioswales would be needed for several years to establish vegetation and as needed following plant establishment. However, including the additional water needed for irrigation, the Modified Project's effect on water supply would remain less than significant.

The MND found that the project would have a less-than-significant effect on available landfill capacity and would comply with federal, state, and local statutes and regulations related to solid waste. As discussed above, demolition and excavation are estimated to generate approximately 16,000 cubic yards of more spoils than originally anticipated. The Modified Project proposes to divert approximately half of that material from landfills by spreading it onsite and raising the proposed building elevation by one foot. The additional disposal of approximately 8,000 cubic yards would have a negligible effect on landfill capacity. As discussed in the MND, the Altamont Landfill has an estimated remaining capacity of approximately 46 million cubic yards, and it is one of several landfills available to receive excess spoils

from the project. Therefore, the Modified Project would have a less-than-significant effect on landfill capacity.

Other Environmental Topics. The Modified Project would have similar, less-than-significant impacts related to Land Use, Population and Housing, Wind, Shadow, and Recreation. The Modified Project, including the proposed approximately one foot height increase in the 400 Paul Avenue building, would neither increase the severity of these impacts associated with the project or result in new or substantially different environmental effects. These topics do not warrant further discussion.

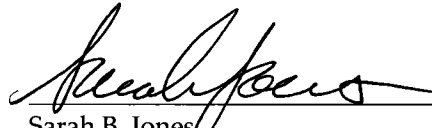
Conclusion

Based on the foregoing, it is concluded that the analyses conducted and the conclusions reached in the Final MND adopted on July 24, 2014 remain valid. The proposed revisions to the project would not cause new significant impacts not identified in the MND, and no new mitigation measures would be necessary to reduce significant impacts. No changes have occurred with respect to circumstances surrounding the proposed project that would cause significant environmental impacts to which the project would contribute considerably, and no new information has become available that shows that the project would cause significant environmental impacts. Therefore, no supplemental environmental review is required beyond this addendum.

Date of Determination:

March 8, 2016

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



Sarah B. Jones
Environmental Review Officer

cc: John Wilson, Cambay Group
Ted Mahl, CAC Architects
Steven Vettel, Farella, Braun & Martel

Bulletin Board / Master Decision File
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