

# Appraisers Building and U.S. Custom House Limited Scope Repair & Alteration Project San Francisco, CA

Draft  
Environmental Assessment

Prepared by the  
United States  
General Services  
Administration

January 2020



**GSA**

**DRAFT ENVIRONMENTAL ASSESSMENT**  
**APPRAISERS BUILDING AND U.S. CUSTOM HOUSE**  
**LIMITED SCOPE REPAIR & ALTERATION PROJECT**  
**SAN FRANCISCO, CALIFORNIA**

**January 31, 2020**

- Lead Agency:** U.S. General Services Administration (GSA)  
50 United Nations Plaza  
San Francisco, CA, 94102
- Lead Agency Contact:** Mr. Osmahn Kadri  
Regional Environmental Quality Advisor/NEPA Project Manager  
Portfolio Management Division (9PTC)  
U.S. General Services Administration  
50 United Nations Plaza, Room 3345, Mailbox 9  
San Francisco, California, 94102  
Telephone: (415) 522-3617  
Email: [osmahn.kadri@gsa.gov](mailto:osmahn.kadri@gsa.gov)
- Availability of Draft EA:** This document is available for public review at the Chinatown Library, 1135 Powell Street, San Francisco, CA 94108 and on the GSA website <https://www.gsa.gov/about-us/regions/welcome-to-the-pacific-rim-region-9/buildings-and-facilities/california/us-appraisers-building> and <https://www.gsa.gov/about-us/regions/welcome-to-the-pacific-rim-region-9/buildings-and-facilities/california/us-custom-house-san-francisco> (the Draft EA is located under the “Current Projects” section).

**Abstract:** This document is an Environmental Assessment (EA) for the Appraisers Building and U.S. Custom House Limited Scope Repair & Alteration Project. The Project involves two adjacent historical buildings in Downtown San Francisco, California - the Appraisers Building located at 630 Sansome Street, and the U.S. Custom House located at 555 Battery Street. The Project is proposed in order to improve certain systems of the Appraisers Building and U.S. Custom House up to current building code, safety standards and serviceable condition and to prolong their useful life. Both buildings contain certain building elements and building systems that, due to age, advancement in technologies, failure, or need for operational upgrades, must be addressed.

This Draft EA analyzes an Action Alternative and a No Action Alternative. The Action Alternative would repair, modify, or replace certain building improvements and systems to improve certain building systems to current building code and safety standards. The limited scope repairs would address deficiencies in the following categories: Electrical; Fire Protection; Architectural Barriers Act Accessibility Standard (ABAAS) Compliance; Curtain Walls; Windows; Roofing; Overhang Canopy; Elevators; Exterior Cladding; Sub-basement Water Intrusion; Building Systems - Mechanical & Plumbing; and Window Washing System. Under the No Action Alternative, the limited scope repairs and alterations to the existing Appraisers Building and U.S. Custom House would not occur.

**Public Comments:** Comments on the Draft EA may be submitted through the 30-day comment period (by March 2, 2020), which will commence with the GSA’s publication of the Notice of Availability for this document in the *Federal Register*. Comments may be submitted in writing or by email to the GSA contact identified above.

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**ACRONYMS AND ABBREVIATIONS**

A	Attainment	CO <sub>2</sub> -E	CO <sub>2</sub> -Equivalents
ABAAS	Architectural Barriers Act Accessibility Standard	dB	Decibels
ACM	Asbestos-Containing Materials	dba	A-weighted decibels
ACQR	Air Quality Control Regions	EA	Environmental Assessment
APE	Area of Potential Effect	EIS	Environmental Impact Statement
BAAQMD	Bay Area Air Quality Management District	EMS	Emergency Medical Service
BART	Bay Area Rapid Transit	ESA	Endangered Species Act
BGEPA	Bald and Golden Eagle Protection Act	FIFRA	Federal Insecticide, Fungicide, and, Rodenticide Act
BMP	Best Management Practices	FHWA	Federal Highway Administration
CAA	Clean Air Act	FONSI	Finding of No Significant Impact
CARB	California Air Resource Board	GHG	Greenhouse Gas Emissions
CalEEMod	California Emission Estimator Model	GIS	Geographical Information System
Cal/OSHA	California Department of Occupational Safety and Health Administration	GSA	General Services Administration
Caltrans	California Department of Transportation	HAPs	Hazardous Air Pollutants
CEQ	Council on Environmental Quality	HFCs	Hydrofluorocarbons
CEQA	California Environmental Quality Act	LBP	Lead Based Paint
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act	Lbs	Pounds
CERFA	Community Environmental Response Facilitation Act	Leq	Equivalent continuous sound level
CFR	Code of Federal Regulations	L <sub>max</sub>	Maximum level of noise
CH <sub>4</sub>	Methane	LOS	Level of Service
CO	Carbon Monoxide	M <sub>3</sub>	Cubic meter
CO <sub>2</sub>	Carbon Dioxide	µg	microgram
		MBTA	Migratory Bird Treaty Act
		mg	Milligram
		MT	Metric tons
		Muni	San Francisco Municipal Transit System
		N	Nonattainment

NAAQS	National Ambient Air Quality Standards		Recovery Act
		ROG	Reactive Organic Gas
NAGPRA	Native American Graves Protection and Repatriation Act	SF <sub>6</sub>	Sulfur Hexafluoride
		SFBAAB	San Francisco Bay Area Air Basin
NEPA	National Environmental Policy Act	SHPO	State Historic Preservation Office
NHPA	National Historic Preservation Act	SO <sub>2</sub>	Sulfur Dioxide
NPL	National Priorities List	SO <sub>x</sub>	Sulfur Oxide
NRHP	National Register of Historic Places	TAC	Toxic Air Contaminants
		Tpy	Tons per year
N <sub>2</sub> O	Nitrous Oxide	TSCA	Toxic Substances Control Act
NO <sub>2</sub>	Nitrogen Dioxide	U.S.	United States
NO <sub>x</sub>	Nitrogen Oxide(s)	USEPA	U.S. Environmental Protection Agency
NOA	Notice of Availability	U	Unclassified
NOI	Notice of Intent	USC	U.S. Code
O <sub>3</sub>	Ozone	USFWS	U.S. Fish and Wildlife Service
OSHA	Occupational Safety & Health Administration	VOC	Volatile organic compound
OSH Act	Occupational Safety & Health Act	VMT	Vehicle Miles Traveled
Pb	Lead		
PBS	Public Buildings Service		
PCBs	Polychlorinated biphenyls		
PFCs	Perfluorocarbons		
PM	Particulate Matter		
PM <sub>2.5</sub>	Particulate Matter 2.5 micrometers or less in diameter		
PM <sub>10</sub>	Particulate Matter 10 micrometers or less in diameter		
PPE	Personal protective equipment		
ppm	Parts per million		
PPV	Peak particle velocity		
RCRA	Resource Conservation and		

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## SUMMARY

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### S.1 Introduction/Background

This Environmental Assessment (EA) has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [USC] 4321 et seq.), as implemented by the regulations promulgated by the Council on Environmental Quality (CEQ) (40 Code of Federal Regulations [CFR] §1500-1508). The principal objectives of NEPA are to ensure the careful consideration of environmental aspects of proposed actions in Federal decision-making processes and to make environmental information available to decision makers and the public before decisions are made and actions are taken. This EA follows the U.S. General Services Administration (GSA) NEPA guidelines, namely the 1999 GSA Public Buildings Service (PBS) NEPA Desk Guide.

GSA proposes limited scope repair and alterations to two adjacent historical buildings in Downtown San Francisco, California - the Appraisers Building located at 630 Sansome Street, and the United States (U.S.) Custom House located at 555 Battery Street. The primary purpose of this EA is to document and evaluate the potential environmental effects of the Proposed Action and the ability of the alternatives to meet the purpose and need for the Proposed Action. An EA is a concise document that is prepared for an action where the significance of the social, economic, and environmental impacts are not clearly established or defined (23 CFR 771.115(c), 40 CFR 1508.9). An EA (1) briefly provides sufficient evidence and analysis for determining whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI); (2) aids an agency's compliance with NEPA when an EIS is not necessary; and (3) facilitates preparation of an EIS when one is necessary (40 CFR Part 1508.9). In accordance with 40 CFR 1502.1, the EA is intended to provide GSA, the public, and decision makers a full and fair discussion of significant environmental impacts from the proposed action and inform decision makers and the public of reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the human environment. In addition to providing disclosure, the objective of the EA is to identify an alternative that satisfies the purpose and need of the Proposed Action and minimizes adverse environmental effects.

### S.2 Purpose and Need

The purpose of the Proposed Action is to improve certain systems of the Appraisers Building and U.S. Custom House up to current building code, safety standards and serviceable condition and to prolong their useful life. Both buildings contain certain building elements and building systems that, due to age, advancement in technologies, failure, or need for operational upgrades, must be addressed. Deficiencies include the following categories:

- Electrical
- Fire Protection
- Architectural Barriers Act Accessibility Standard (ABAAS) Compliance
- Curtain Walls
- Windows
- Roofing
- Overhang Canopy
- Elevators
- Exterior Cladding
- Sub-basement Water Intrusion
- Building Systems - Mechanical & Plumbing
- Window Washing System



The Proposed Action is needed to provide safe conditions for visitors and tenants of the building. The buildings' systems will continue to deteriorate and could potentially pose unsafe conditions for staff and visitors unless they are repaired, modified or replaced.

### **S.3 Action Alternatives**

This EA includes an analysis of potential environmental impacts associated with the Proposed Action (Action Alternative) and the No Action Alternative.

#### **Action Alternative**

The Action Alternative would consist of repair, modification, or replacement of certain building systems at both buildings. A substantial part of the limited repair and alteration work will occur to the interior of the building to bring certain building systems up to current building code and safety standards.

Table S.1 below describes the proposed limited repair and alteration work for each building.

Construction is anticipated to begin in the fall of 2022 and occur over a period of two years. The limited repair and alteration work would occur simultaneously on both buildings but not all the same components would be done at the same time. Tenants of the buildings would continue to work in the buildings during the repair work and may be relocated to other sections of the buildings as necessary for safety.

#### **No Action Alternative**

The No Action Alternative is included and analyzed to provide a baseline for comparison with impacts from the action alternative, and to satisfy federal requirements for analyzing "no action" under NEPA (40 CFR 1502.14(d)). Under the No Action Alternative, the limited scope repairs and alterations to the existing Appraisers Building and U.S. Custom House would not occur.

### **S.4 Proposed Action Impacts**

Table S.2, Summary of Environmental Consequences and Avoidance, Minimization, and/or Mitigation Measures, summarizes the impacts and avoidance, minimization, and mitigation measures for each alternative. Detailed discussion and analysis of impacts are provided in Chapter 3.0 of this EA.

**Table S.1**  
**Description of Repair, Modification, or Replacement**

Category	Description
<b>APPRAISERS BUILDING</b>	
Curtain Walls	Replacement (with new) of curtain wall system facing the alleyway.
Alley Canopy	Refinish soffit, new drainage, new roofing and flashing.
Exterior Cladding	Power wash, re-seal and re-point as needed; remove and reset lower granite panels, new flashing.
Sub Basement	Cut slab, new perforated drain pipe, new floor drain and connect to existing system; new dedicated condensate drain and pipe for blowout and drainage.
Elevators	Modernize including associated electrical and mechanical work.
Roofing	Remove and replace built up roofing.
Window Washing Equipment	Remove existing system and replace with new (up to code and standards).
Double Hung Windows	Full rehabilitation including some mechanical operators – frames to remain.
Electrical	Replace a holding cell and toilet room electrical to be compliant with California Building Code.
Fire Protection	Replace juvenile holding cell sprinkler heads with institutional type, add additional sprinkler coverage as needed; seal all unprotected openings in electrical and telecom room; adjust door closure devices on all electrical/telecom room fire.
Emergency Lighting	New emergency lighting throughout Loft Area.
Fire Alarm	New fire alarm strobes and speakers in two rooms and Loft Area.
Mechanical Loft	Duct replacement and duct pressure testing and seal duct.
Plumbing	New vacuum pumps; hydronic pump replacement.
Mechanical	Main steam piping replacement; Core ductwork replacement; Bypass pipe and control valve addition.
Accessibility	ABAAS – door closers, drinking fountains, public counters, signage.
<b>U.S. CUSTOM HOUSE</b>	
Roofing	Repairs of various roofing types, slate, copper, built up, repair parapets and flashings.
Elevators	Modernization.
Windows	Repair windows – minor repairs to existing windows.
Electrical	New under-carpet pathway and associated architectural for two agencies; replace sub panels, main switchboard, IT raceway and closets; replace IT raceway behind drywall and surface mounted.
Fire Protection	Correct sprinkler deficiency in Attic level; seal all vertical penetrations in electrical closets; add deployable fire rated product 4 <sup>th</sup> and 5 <sup>th</sup> floors; New cross corridor double doors with magnetic hold open devices and associated architectural work.
Plumbing	Steam distribution piping upgrade.
Mechanical	General exhaust fan ductwork and gas radiator replacement.
Accessibility	ABAAS – door closers, drinking fountains, public counters, signage.

**Table S.2  
 Summary of Environmental Consequences and Avoidance,  
 Minimization and/or Mitigation Measures**

Potential Impacts of the Proposed Action		Avoidance, Minimization, and/or Mitigation Measures
Action Alternative	No Action Alternative	
<b>Cultural and Historic Resources</b>		
The Action Alternative would be consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties.	No substantial adverse cultural or historic impacts would result from the No Action Alternative.	Best Management Practices (BMPs) will be developed as part of the State Historic Preservation Office (SHPO) consultation.
<b>Air Quality and Greenhouse Gas Emissions</b>		
No adverse impact associated with regional air quality conformity, air quality, or greenhouse gas emissions would occur.	No substantial adverse air quality or greenhouse gas emissions impacts would result from the No Action Alternative.	No avoidance, minimization, or mitigation measures are required. The following BMPs will be implemented: utilizing vehicles that meet the current vehicle emission standards, eliminating vehicle idling, using ultra-low sulfur diesel, utilizing battery-powered or natural gas tools when available, and registering and maintaining all fleet vehicles with applicable California construction fleet equipment standards.
<b>Noise and Vibration</b>		
No substantial adverse noise or vibration impacts would occur, since noise levels would not exceed the City of San Francisco construction noise standard at the nearest sensitive receptors, nor would vibration-generation equipment be used during construction.	No substantial adverse noise or vibration impacts would result from the No Action Alternative.	No avoidance, minimization, or mitigation measures are required. The following BMPs will be implemented: <ul style="list-style-type: none"> <li>• Properly outfit and maintain construction equipment with manufacturer recommended noise reduction devices to minimize construction-generated noise.</li> <li>• Operate diesel equipment with closed engine doors and equip with factory recommended mufflers.</li> <li>• Prohibit unnecessary idling of internal combustion engines (e.g., in excess of 5 minutes).</li> <li>• Locate material stockpiles and mobile equipment staging, parking, and maintenance areas as far as practicable from noise sensitive receptors.</li> <li>• Limit use of noise-producing signals, including horns, whistles, alarms, and bells, for safety warning purposes only.</li> </ul>

Potential Impacts of the Proposed Action		Avoidance, Minimization, and/or Mitigation Measures
Action Alternative	No Action Alternative	
		<ul style="list-style-type: none"> <li>Receive and resolve noise complaints (i.e., this is the responsibility and under the authority of the on-site construction supervisor).</li> <li>Use designated truck routes designed to minimize impacts on residential areas and sensitive receptors for vehicles used to haul materials or traveling to and from the site shall use designated truck routes.</li> </ul>
<b>Transportation and Parking</b>		
No substantial adverse construction-related traffic impacts would occur during construction. Although pedestrian access around the Proposed Action site may be temporarily modified during the external parts of repairs, there would be no long-term impact to pedestrian access.	No substantial adverse transportation and parking impacts would result from the No Action Alternative.	<p>Although impacts to transportation and parking would be less than significant, the following provide further measures to minimize potential impacts:</p> <ul style="list-style-type: none"> <li>Develop a transportation management plan to minimize the effects of recurring worker commuting trips on the street network and parking facilities. To the extent feasible, the plan should incentivize construction workers to use Muni and BART services for access.</li> <li>Process appropriate construction traffic control permits with the City of San Francisco to minimize any construction impacts to traffic and transit services.</li> </ul>
<b>Solid and Hazardous Wastes/Materials</b>		
No impacts related to solid and hazardous wastes/materials would occur.	No substantial adverse solid and hazardous wastes/materials impacts would result from the No Action Alternative.	<p>No avoidance, minimization, or mitigation measures are required. The following BMPs will be implemented:</p> <ul style="list-style-type: none"> <li>The construction contractor would implement a Hazardous Materials and Wastes Management Plan to ensure appropriate procedures are in place to address handling, storage, and disposal of hazardous materials and wastes during construction.</li> <li>The construction contractor shall hire a qualified independent contractor to remove and dispose any asbestos containing material and Lead Based Paint (LBP) in the appropriate repair areas of the Appraisers Building and the U.S. Custom House. The same firm shall perform environmental monitoring during the</li> </ul>

Potential Impacts of the Proposed Action		Avoidance, Minimization, and/or Mitigation Measures
Action Alternative	No Action Alternative	
		abatement work in accordance with the U.S. Environmental Protection Agency, and other applicable environmental regulations. All waste disposal manifests shall be turned over to GSA upon completion of the repairs.
<b>Biological Resources</b>		
No impacts related to biological resources would occur.	No substantial adverse biological impacts would result from the No Action Alternative.	<p>No avoidance, minimization, or mitigation measures are required. The following BMPs will be implemented:</p> <ul style="list-style-type: none"> <li>In the event a peregrine falcon or any other protected species is discovered nesting on any part of the subject buildings, the contractor should contact the building manager. Should exterior work such as window replacement or roofing repairs be required within 500 feet (horizontal or vertical) of an active raptor or special-status species nest, or within 300 feet of any other protected species nest, the contractor shall cease work until the nest has been abandoned. Alternatively, the contractor should contact the U.S. Fish and Wildlife Service (USFWS) San Francisco field office to establish a reduced buffer zone around the species to allow work to continue.</li> </ul>
<b>Safety and Occupational Health</b>		
No impacts related to safety and occupational health and safety risks to workers, children or the general public would occur.	No impacts related to safety and occupational health would occur.	<p>No avoidance, minimization, or mitigation measures are required. The following BMPs will be implemented:</p> <ul style="list-style-type: none"> <li>The construction contractor would implement a Health and Safety Plan to ensure appropriate safety measures are implemented during construction.</li> <li>The Health and Safety Plan shall address personal protective equipment (PPE) and decontamination requirements while handling and disposing of hazardous materials, as well as proper disposal of investigation-derived waste. In addition, if there are sub-contractors, they shall follow the requirements of the Health and Safety Plan.</li> </ul>

## **S.5 Coordination with Public and Other Agencies**

### **Permits and Approvals Needed**

Permits and approvals that would be obtained for the Proposed Action are listed below:

- Street Space and Building Permits issued by the City of San Francisco

### **Consultation and Coordination with Public Agencies**

Communication with various agencies was initiated in 2019 and included notification regarding the public scoping meeting held on August 8, 2019. Agencies included, in part, the California Office of Historic Preservation; Historical Resources Commission; San Francisco Museum and Historical Society; San Francisco Architectural Heritage; Landmarks Preservation Board Buildings and Grounds; California Native American Heritage Commission; California Department of Fish and Wildlife; U.S. Fish and Wildlife Service; Bay Area Air Quality Management District; U.S. Environmental Protection Agency, Region 9; San Francisco Department of Public Health – Environmental Health; San Francisco Board of Supervisors; Office of the Mayor - City of San Francisco; Bureau of Architecture; and Numerous San Francisco Departments (Fire Department, Department of Building Inspection, Public Works, Division of Engineering Services, Planning Commission, Planning Department-Transportation, Police Department).

### **Public Participation**

Pursuant to NEPA, a Notice of Intent (NOI) was prepared for the Proposed Action and published in Vol. 84, No. 146 of the Federal Register on Tuesday, July 30, 2019. The NOI invited agencies and the public to submit comments regarding the scope of the EA. Scoping for the Proposed Action was accomplished through direct mail correspondence to the appropriate federal, state, and local agencies; surrounding property owners; and private organizations who are anticipated to have interest in the Proposed Action. During the public comment period for the scoping process (July 30, 2019 through August 31, 2019), no written comments were received. GSA also provides information on the Proposed Action on their website at: <https://www.gsa.gov/about-us/regions/welcome-to-the-pacific-rim-region-9/buildings-and-facilities/california/us-appraisers-building> and <https://www.gsa.gov/about-us/regions/welcome-to-the-pacific-rim-region-9/buildings-and-facilities/california/us-custom-house-san-francisco> (the Draft EA is located under the “Current Projects” section).

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## 1. PURPOSE AND NEED

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The General Services Administration (GSA) has prepared this Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [USC] 4321 et seq.), as implemented by the Council on Environmental Quality (CEQ) regulations (40 Code of Federal Regulations [CFR] §1500-1508), and GSA guidelines for implementing NEPA (GSA 1999).

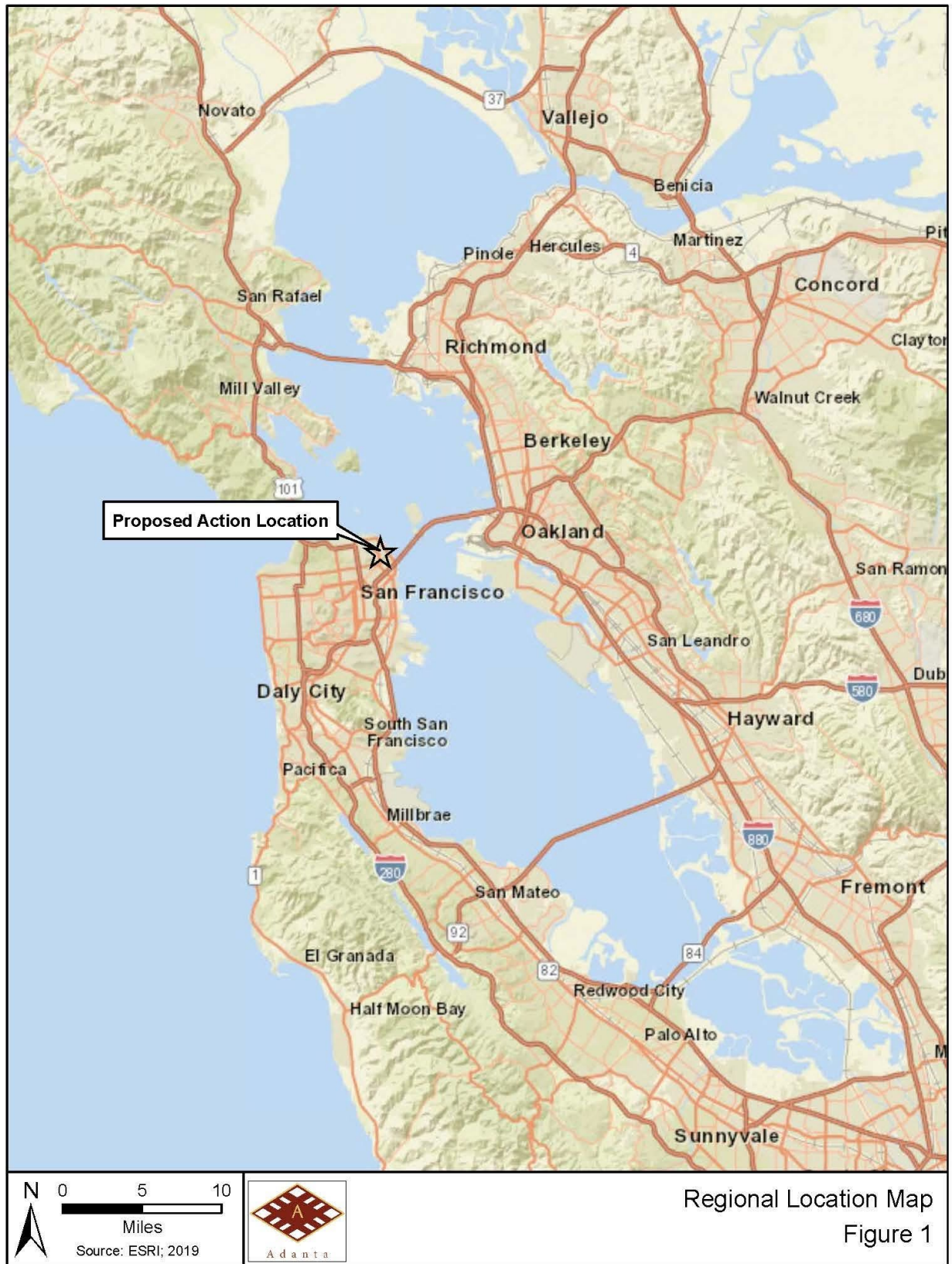
The principal objectives of NEPA are to ensure the careful consideration of environmental aspects of proposed actions in Federal decision-making processes, and to make environmental information available to decision makers and the public before decisions are made and actions are taken. This section of the EA briefly identifies the Proposed Action; specifies the purpose and need of the Proposed Action; provides summary information regarding the purpose, scope, and organization of this EA; summarizes public agency and community coordination; and details the environmental review process.

### 1.1 Proposed Action

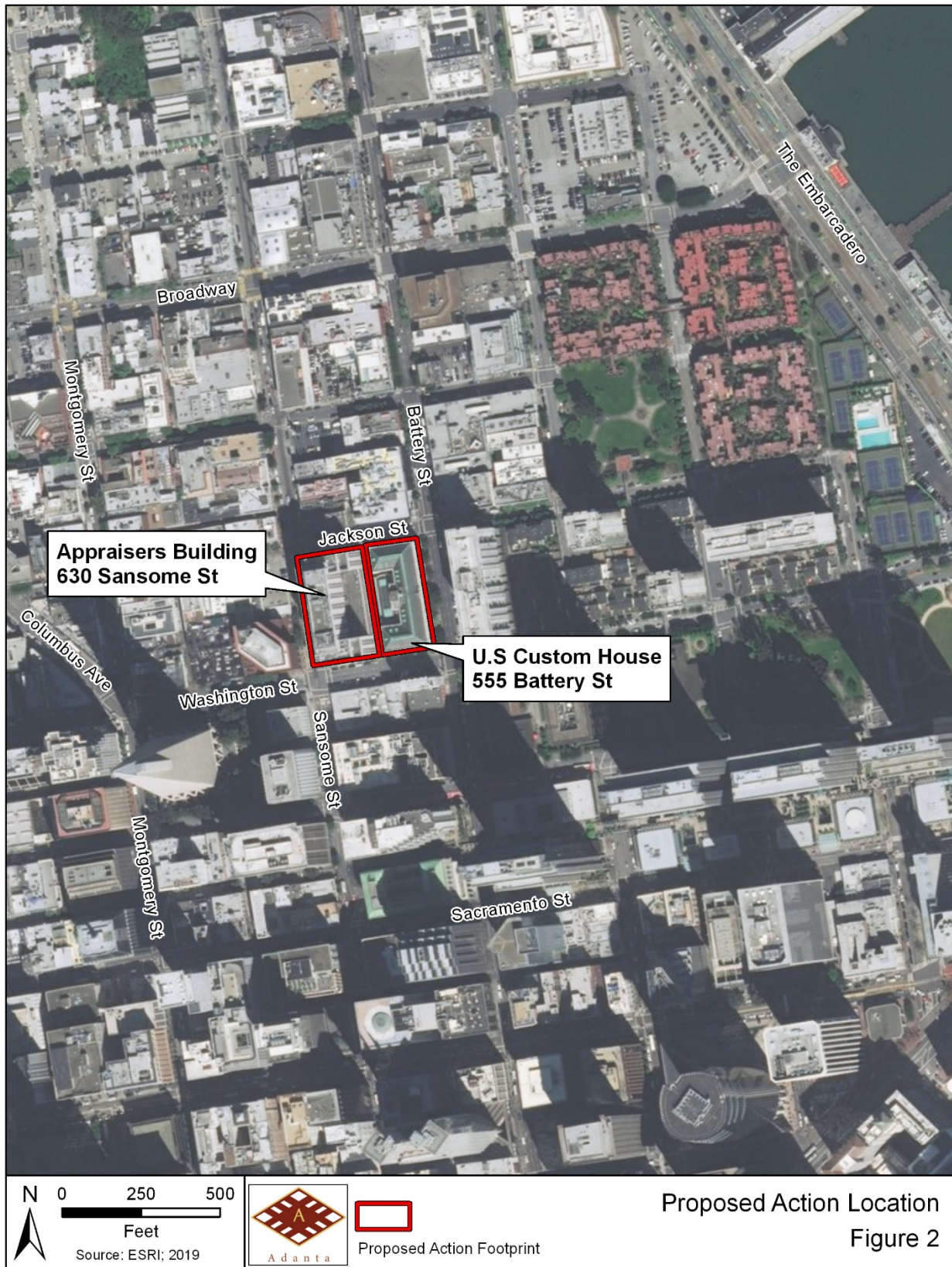
GSA proposes to conduct limited scope repair and alteration work to the Appraisers Building and United States (U.S.) Custom House to repair, modify or replace certain building improvements and systems. The limited scope repair and alteration work will improve certain building systems to current building code and safety standards.

The Appraisers Building and U.S. Custom House are adjacent buildings located within the financial district in Downtown San Francisco. The regional location and vicinity maps presented in Figure 1, Regional Location Map, and Figure 2, Proposed Action Location, show the locations of the Proposed Action.

GSA intends to maintain the historical elements of the buildings (except for a replacement with new curtain wall for the Appraisers Building) to meet requirements while at the same time repairing, modifying, or replacing certain building improvements and systems to ensure the building improves its' current safety and serviceable condition standards. The footprint of the buildings will not be expanded, and construction is anticipated to begin in the fall of 2022.







### *Appraisers Building*

The Appraisers Building is a federal office building located at 630 Sansome Street on a 0.86-acre site in the central business district of San Francisco. The original structure was constructed in 1944 and is nineteen stories above-ground.



The steel and concrete Art Deco building is generally rectangular in shape, but steps back several times at upper levels to a “U” shape and then back to a rectangular shape with a terracotta exterior cladding. The building houses a changing population of Federal agencies. The Appraisers Building has approximately 985 staff with about 434,000 square feet of rentable space. This building is adjacent to the U.S. Custom House located at 555 Battery Street.

The Appraisers Building was repaired and partially renovated numerous times and recently underwent a full prospectus level renovation for tenant realignment and building upgrade, which was completed in 2012. In 1994, the Appraisers Building was listed on the National Register of Historic Places (NRHP). The NRHP is the official list of the Nation’s historic places worthy of preservation.

### *U.S. Custom House*

The U.S. Custom House is located at 555 Battery Street in Downtown San Francisco, adjacent to the Appraisers Building. The 0.86-acre site is located on the northern edge of the city’s Financial District, occupying one-half of the block bounded by Sansome, Jackson, Battery and Washington Streets. The subject block is shared with the Appraisers Building (discussed above) located at 630 Sansome Street.



The U.S. Custom House was constructed in 1911 and is composed of two interconnected structures. The U.S. Custom House is also on the NRHP (as of 1975). A five-story “U” shaped main building with attic partially surrounds and is joined to a two-story core building. The overall structure consists of a rectangular steel frame. The U.S. Custom House has approximately 480 staff and approximately 127,000 square feet of rentable space.

## **1.2 Purpose and Need of the Proposed Action**

The purpose of the Proposed Action is to improve certain systems of the Appraisers Building and U.S. Custom House up to current building code, safety standards and serviceable condition and to prolong their useful life. Both buildings contain certain building elements and building systems that, due to age, advancement in technologies, failure, or need for operational upgrades, must be addressed. Deficiencies include the following categories:

- Electrical
- Fire Protection
- Architectural Barriers Act Accessibility Standard (ABAAS) Compliance

- Curtain Walls
- Windows
- Roofing
- Overhang Canopy
- Elevators
- Exterior Cladding
- Sub-basement Water Intrusion
- Building Systems - Mechanical & Plumbing
- Window Washing System



Photo: Appraisers Building sub-basement water intrusion needing repair.

The Proposed Action is needed to provide safe conditions for visitors and tenants of the building. The buildings' systems will continue to deteriorate and could potentially pose unsafe conditions for staff and visitors unless they are repaired, modified or replaced.

### 1.3 Purpose and Scope of the EA

#### 1.3.1 Purpose of the EA

The primary purpose of this EA is to document and evaluate the environmental effects of the Proposed Action and the ability of the alternatives to meet the purpose and need identified above. An EA is a concise document that is prepared for an action where the significance of the social, economic, and environmental impacts are not clearly established or defined (23 CFR 771.115(c), 40 CFR 1508.9). An EA briefly (1) provides sufficient evidence and analysis for determining whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI); (2) aids an agency's compliance with NEPA when an EIS is not necessary; and (3) facilitates preparation of an EIS when one is necessary (40 CFR Part 1508.9).

In accordance with 40 CFR 1502.1, the EA is intended to provide GSA, the public, and decision makers a full and fair discussion of potential environmental effects from the Proposed Action and inform decision makers and the public of reasonable alternatives that could avoid or minimize adverse impacts or enhance the quality of the human environment. In addition to providing disclosure, the objective of the EA is to identify an alternative that satisfies the purpose and need of the Proposed Action and minimizes adverse environmental effects.

#### 1.3.2 Scope of the EA

This EA includes an analysis of potential environmental impacts associated with the Proposed Action (Action Alternative) and the No Action Alternative. Data presented in this EA are based on studies and investigations conducted as part of the planning and environmental review process. Studies and investigations conducted for the Proposed Action are detailed (as appropriate) throughout this document. Issues included for detailed analysis in this document were determined through the scoping process, which included notifying agencies and the public.

GSA published a Notice of Intent (NOI) to prepare an EA in the Federal Register on July 31, 2019. The NOI invited agencies and the public to submit comments regarding the scope of the EA. The 30-day

comment period on the NOI ended on August 31, 2019. The U.S. Environmental Protection Agency (USEPA), Region 9 acknowledged receipt via e-mail of the notification that an EA would be prepared. USEPA Region 9 had no comments at that time. No other public or agency comments were received.

Based on the Proposed Action and feedback received on the scope of the EA, this EA evaluates in detail the potential environmental effects of the Proposed Action with respect to the following environmental issue areas: cultural and historic resources; air quality and greenhouse gas emissions (GHG); noise and vibration; transportation and parking; solid and hazardous wastes/materials; biological resources; and safety and occupational health.

Other environmental issue areas are not analyzed in detail in the EA because there is no potential for the Proposed Action to result in environmental effects (or only negligible effects) associated with that particular issue. The introduction to Chapter 3 of this EA contains brief descriptions of these resource areas (e.g., hydrology and water resources; geology, soils and seismicity; land use; visual resources; and utilities) and discusses the reasons why the EA does not evaluate potential effects of the Proposed Action related to them in detail.

## 1.4 Document Organization

The EA has been prepared in accordance with NEPA, as amended (42 USC 4321 et seq.), as well as CEQ Regulations (40 CFR Parts 1500-1508) and GSA NEPA procedures (GSA 1999). Technical analysis applicable to the Proposed Action are summarized within individual environmental issue sections, and the detailed technical backup are included in the EA Appendices. This EA is organized in the following manner:

- **Summary:** Briefly summarizes the purpose and objectives of this EA and the purpose and need for the Proposed Action; describes the Proposed Action (Action Alternative) and the No Action Alternative; identifies proposed action impacts and avoidance, minimization, and mitigation measures for each alternative; and describes the coordination with the public and other agencies that has occurred or is planned for the Proposed Action.
- **Chapter 1, Purpose and Need:** Identifies the Proposed Action, states the purpose and need of the Proposed Action; discusses the intended uses of the EA, including the purpose, scope, and organization of the EA; summarizes coordination with public agencies and community stakeholders; and discusses the environmental review process.
- **Chapter 2, Proposed Action and Alternatives:** Describes the Proposed Action and No Action Alternative, as well as the anticipated permits and approvals required for the Proposed Action.
- **Chapter 3, Affected Environment; Environmental Consequences; and Avoidance, Minimization, and Mitigation Measures:** Constitutes the main body of the EA and contains environmental analysis of the Proposed Action and the No Action alternatives. For each environmental issue analyzed in detail, this chapter includes a discussion of the regulatory setting; the affected environment; environmental consequences; and if applicable, avoidance, minimization, and mitigation measures. This chapter also identifies the environmental issues that are not analyzed in detail and documents the reasons why they are not analyzed in detail. Additionally, Chapter 3 addresses cumulative effects and irreversible or irretrievable commitment of resources that would be involved in the Proposed Action.
- **Chapter 4, Public Involvement and Coordination:** Documents the coordination and consultation that GSA has completed with public agencies and the public regarding the Proposed Action.

- Chapter 5, List of Preparers and Contributors: Identifies the individuals who contributed to the preparation of the EA and associated technical analysis.
- Chapter 6, References: Presents the references used in preparation of the EA.

## 1.5 Public Involvement and Agency Coordination

Regulations from the CEQ (40 CFR part 1506.6) direct agencies to involve the public in preparing and implementing their NEPA procedures.

GSA will coordinate with local public agencies and community representatives and stakeholders during the environmental phases of the Proposed Action, including the City of San Francisco. GSA held one public scoping meeting on August 8, 2019 to facilitate discussions of the proposed limited scope repair and alteration work, and to solicit input from stakeholders. GSA will continue to have ongoing coordination with these agencies. Given the historic status of the two buildings, in accordance with Section 106 of the National Historic Preservation Act (NHPA), GSA will consult with the State Historic Preservation Office (SHPO).

## 1.6 Environmental Review Process

GSA initiated the NEPA process by publishing a NOI in the Federal Register on July 31, 2019, and published an NOI for two days in the *San Francisco Chronicle* July 30 and August 4, 2019 (See Appendix A – Public Notice and Consultation). The NOI described the Proposed Action and Alternatives, requested public comments during the public scoping process, and provided dates of a 30-day public comment period.

The NOI marks the first formal step in the EA preparation, as it serves as the official legal notice that the federal agency is commencing preparation of an EA. The GSA also mailed project notification postcards to stakeholders (residences, businesses, organizations, elected officials, and government agencies) within the immediate and adjacent project area to inform them of the Proposed Action and provide information on the scoping process and public meeting (see Appendix D - Distribution List).

The next step in the NEPA process was to conduct the scoping process for the EA. Scoping refers to the process by which federal lead agencies solicit input from the public and interested agencies and organizations on the nature and extent of environmental issues and potential impacts to be addressed in the EA, and the methods by which they will be evaluated. NEPA specifically requires the federal lead agency to consult with other federal agencies that have jurisdiction by law or special expertise on the Proposed Action (40 CFR 1501.7). Although scoping is discussed in the CEQ regulations largely in the context of EIS preparation and is not formally required for the preparation of EAs, it is the policy of GSA to conduct scoping for EAs to streamline the NEPA process (GSA 1999). The scoping meeting was held on August 8, 2019 at the Chinatown Branch Library, 1135 Powell Street, San Francisco, CA.

Following the scoping process, GSA prepared the Draft EA to inform the public of the Proposed Action and to allow the opportunity for public review and comment. Pursuant to 40 CFR 1506.6, lead agencies must provide public notice of the availability of the Draft EA to interested persons and agencies. A public meeting will be held during the public review period to provide the public with an additional opportunity to provide comments on the Draft EA. Notice of the public meeting was published in the *San Francisco Chronicle* and via social media avenues. Comments on the Draft EA may be submitted in writing or by electronic mail to GSA through the end of the review period at the address or email address below.

Mr. Osmahn Kadri  
Regional Environmental Quality Advisor/NEPA Project Manager  
U.S. General Services Administration  
50 United Nations Plaza, Room 3345 Mailbox 9  
San Francisco, CA 94102  
E-mail: [osmahn.kadri@gsa.gov](mailto:osmahn.kadri@gsa.gov)

Please submit all comments by March 2, 2020.

After comments are received from the public and reviewing agencies, GSA will respond to comments and prepare a Final EA. The Final EA will include and respond to substantive comments received on the Draft EA. The Notice of Availability (NOA) of the Final EA will be published in the Federal Register; a 30-day review of the Final EA will occur at that time. After completion of the 30-day Final EA review period, GSA will consider all available information on the environmental effects of the Proposed Action identified in the Final EA (including comments received and responses to them). If GSA determines that the Proposed Action would not significantly impact the environment, GSA will issue a FONSI. If it is determined that the Proposed Action is likely to have a significant effect on the environment, an EIS will be prepared. A NOA of the FONSI will be sent to the affected units of federal, state, and local government.

## 2. PROPOSED ACTION AND ALTERNATIVES

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As discussed in Chapter 1, Purpose and Need, GSA proposes limited scope repair and alteration work to the existing Appraisers Building and U.S. Custom House located in San Francisco, California. The purpose and need for the Proposed Action is documented in Chapter 1. This section of the EA describes the Action Alternative developed by GSA to satisfy the purpose and need, as well as a No Action Alternative for comparative baseline analysis.

### 2.1 Alternative Selection Criteria

NEPA's implementing regulations provide guidance on the consideration of alternatives to a federally proposed action and require rigorous exploration and objective evaluation of reasonable alternatives. Only those alternatives determined to be reasonable and meeting the purpose and need require detailed analysis. This EA has evaluated potential alternatives against the following selection criteria:

1. **Safety and Health.** A potential alternative must meet building codes for safety and health.
2. **Historical Qualities of the Building.** A potential alternative must maintain the historical qualities of the buildings as both buildings are listed on the NRHP.
3. **Long Term Solution to Recurring Maintenance Issues.** A potential alternative must provide a long-term solution to recurring maintenance issues as opposed to "band-aid" repairs.

Based on the reasonable alternative selection criteria, and the minimal amount of exterior repair and alteration required, GSA has identified one action alternative for implementing the Proposed Action. Most of the repair and alteration would occur to the interior of the two subject buildings; therefore, this EA carries one Action Alternative forward for evaluation because it would meet the purpose and need for the Proposed Action. In addition, this EA analyzes the No Action Alternative.

### 2.2 Alternatives Carried Forward for Analysis

#### 2.2.1 Action Alternative – Repair, Modification, or Replacement

The Action Alternative would consist of repair, modification, or replacement of certain building systems at both buildings. A substantial part of the limited repair and alteration work will occur to the interior of the building to bring certain building systems up to current building code and safety standards.

Table 2.1 below describes the proposed limited repair and alteration work for each building.



Photo: Appraisers Building example of curtain wall repairs needed.

**Table 2.1**  
**Description of Repair, Modification, or Replacement**

<b>Category</b>	<b>Description</b>
<b>APPRAISERS BUILDING</b>	
Curtain Walls	Replacement (with new) of curtain wall system facing the alleyway.
Alley Canopy	Refinish soffit, new drainage, new roofing and flashing.
Exterior Cladding	Power wash, re-seal and re-point as needed; remove and reset lower granite panels, new flashing.
Sub Basement	Cut slab, new perforated drain pipe, new floor drain and connect to existing system; new dedicated condensate drain and pipe for blowout and drainage.
Elevators	Modernize including associated electrical and mechanical work.
Roofing	Remove and replace built up roofing.
Window Washing Equipment	Remove existing system and replace with new (up to code and standards).
Double Hung Windows	Full rehabilitation including some mechanical operators – frames to remain.
Electrical	Replace a holding cell and toilet room electrical to be compliant with California Building Code.
Fire Protection	Replace juvenile holding cell sprinkler heads with institutional type, add additional sprinkler coverage as needed; seal all unprotected openings in electrical and telecom room; adjust door closure devices on all electrical/telecom room fire.
Emergency Lighting	New emergency lighting throughout Loft Area.
Fire Alarm	New fire alarm strobes and speakers in two rooms and Loft Area.
Mechanical Loft	Duct replacement and duct pressure testing and seal duct.
Plumbing	New vacuum pumps; hydronic pump replacement.
Mechanical	Main steam piping replacement; Core ductwork replacement; Bypass pipe and control valve addition.
Accessibility	ABAAS – door closers, drinking fountains, public counters, signage.
<b>U.S. CUSTOM HOUSE</b>	
Roofing	Repairs of various roofing types, slate, copper, built up, repair parapets and flashings.
Elevators	Modernization.
Windows	Repair windows – minor repairs to existing windows.
Electrical	New under-carpet pathway and associated architectural for two agencies; replace sub panels, main switchboard, IT raceway and closets; replace IT raceway behind drywall and surface mounted.
Fire Protection	Correct sprinkler deficiency in Attic level; seal all vertical penetrations in electrical closets; add deployable fire rated product 4 <sup>th</sup> and 5 <sup>th</sup> floors; New cross corridor double doors with magnetic hold open devices and associated architectural work.
Plumbing	Steam distribution piping upgrade.
Mechanical	General exhaust fan ductwork and gas radiator replacement.
Accessibility	ABAAS – door closers, drinking fountains, public counters, signage.



Under the Action Alternative, the GSA would not change the number of employees or types of activities that occur at the buildings or the building footprints; the Action Alternative only consists of building improvements.

### 2.2.1.1 Construction Schedule

Construction is anticipated to begin in the fall of 2022 and occur over a period of 2 years. The limited repair and alteration work would occur simultaneously on both buildings but not all the same components would be done at the same time. Construction work would be conducted during normal business hours as often as possible (i.e., Monday through Friday, 7:30 A.M. to 5:00 P.M.); however, some work may occur during other hours as needed and would likely occur within the interior portions of the structures. Tenants of the buildings would continue to work in the buildings during the repair work and may be relocated to other sections of the buildings as necessary for safety.



Photo: Appraisers Building example of curtain wall repairs needed.

The construction schedule during off hours will depend on the potential temporary impact to occupants and the neighboring community. The substantial part of the work would occur inside the buildings; however, in order to access the windows for removal, rehabilitation, and then reinstallation, sidewalks surrounding the perimeter of the building may be temporarily impacted. Pedestrian walkways below the building would be closed during construction of exterior improvements.

Public parking around the perimeter of both buildings is currently prohibited due to federal security procedures. Parking around the buildings is currently limited to government only vehicles and is strictly controlled except for one small portion of the U.S. Custom House for bicycle and motorcycle parking. It is anticipated that the majority of the staging area to be used during construction would be within the alleyway that is on federal property between the buildings and is not currently accessible to the public. It is anticipated that the construction staging areas might temporarily affect limited parking and sidewalks surrounding the Appraisers Building and U.S. Custom House.



Photo: Government only parking around the perimeter of the U.S. Custom House.

GSA intends to maintain historical elements of the building to meet legal requirements while at the same time repairing, modifying, or replacing certain building improvements and systems to ensure the building is up to current safety and serviceable condition standards. The footprint of the buildings will not be expanded.

### 2.2.1.2 Best Management Practices

This section presents an overview of the best management practices (BMPs) that are incorporated into the Proposed Action. BMPs are existing policies, practices, and measures that would be implemented to reduce the environmental impacts of the Proposed Action. Although BMPs mitigate potential impacts by

avoiding, minimizing, or reducing/eliminating impacts, BMPs are distinguished from potential mitigation measures because BMPs are (1) existing requirements for the Proposed Action; (2) ongoing, regularly occurring practices; or (3) not unique to this Proposed Action. In other words, the BMPs identified in this document are inherently part of the Proposed Action and are not potential mitigation measures proposed as a function of the NEPA environmental review process for the Proposed Action. Table 2.2, Best Management Practices, includes an initial list of BMPs.

**Table 2.2**  
**Best Management Practices**

<b>BMP</b>	<b>Description</b>	<b>Impacts Reduced/Avoided</b>
Cultural and Historic Resources	Implementation of the Proposed Action would result in an overall beneficial effect to the buildings. GSA would implement the Proposed Action in accordance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties. The Standards would direct the manner in which the historic buildings are altered, in order to ensure that historic integrity would be retained and to ensure that the activities would be below the threshold of an adverse effect. GSA is coordinating with SHPO requesting that SHPO concur with GSA’s determination of No Historic Properties Affected for the Proposed Action	Historic Resources
Air Quality and Greenhouse Gas (GHG) Emissions Reduction Measures	The Proposed Action would comply with applicable regulatory requirements and emissions best management practices of the Bay Area Air Quality Management District. Examples include utilizing vehicles that meet the newest vehicle emission standards, eliminating vehicle idling, using ultra-low sulfur diesel, utilizing battery-powered or natural gas tools when available, and registering and maintaining all fleet vehicles with applicable California construction fleet equipment standards.	Air Quality and GHG Emissions
Noise and Vibration Control Measures	<p>The construction contractor would comply with the San Francisco Noise Ordinance (Police Code Article 29) and implement the following construction BMPs, as applicable, to reduce noise and vibration effects during construction:</p> <ul style="list-style-type: none"> <li>• Properly outfit and maintain construction equipment with manufacturer recommended noise reduction devices to minimize construction-generated noise.</li> <li>• Operate diesel equipment with closed engine doors and equip with factory recommended mufflers.</li> <li>• Prohibit unnecessary idling of internal combustion engines (e.g., in excess of 5 minutes).</li> </ul>	Noise

BMP	Description	Impacts Reduced/Avoided
	<ul style="list-style-type: none"> <li>• Locate material stockpiles and mobile equipment staging, parking, and maintenance areas as far as practicable from noise sensitive receptors.</li> <li>• Limit use of noise-producing signals, including horns, whistles, alarms, and bells, for safety warning purposes only.</li> <li>• Receive and resolve noise complaints (i.e., this is the responsibility and under the authority of the on-site construction supervisor).</li> <li>• Use designated truck routes designed to minimize impacts on residential areas and sensitive receptors for vehicles used to haul materials or traveling to and from the site shall use designated truck routes.</li> </ul>	
Transportation and Parking	<p>The Proposed Action’s impacts to transportation and parking would be limited to the duration of construction. Delivery and removal trips would be periodic and may be scheduled outside of the traditional peak commuting periods. Although impacts to transportation and parking would be less than significant, the following provide further measures to minimize potential impacts:</p> <ul style="list-style-type: none"> <li>• Develop a transportation management plan to minimize the effects of recurring worker commuting trips on the street network and parking facilities. To the extent feasible, the plan should incentivize construction workers to use Muni and BART services for access.</li> <li>• Process appropriate construction traffic control permits with the City of San Francisco to minimize construction impacts to traffic and transit services.</li> </ul>	Transportation and Parking
Hazardous Materials and Wastes Management Plan	<p>The construction contractor would implement a Hazardous Materials and Wastes Management Plan to ensure appropriate procedures are in place to address handling, storage, and disposal of hazardous materials and wastes during construction.</p>	Public Health and Safety (Hazardous Waste)

<b>BMP</b>	<b>Description</b>	<b>Impacts Reduced/Avoided</b>
	<p>The Proposed Action construction contractor shall hire a qualified independent contractor to remove and dispose any asbestos containing material and LBP in the appropriate repair areas of the Appraisers Building and the U.S. Custom House. The same firm shall perform environmental monitoring during the abatement work in accordance with the USEPA, and other applicable environmental regulations. All waste disposal manifests shall be turned over to GSA upon completion of the repairs.</p>	
<p>Biological Resources</p>	<p>In the event a peregrine falcon or any other protected species is discovered nesting on any part of the subject buildings, the contractor should contact the building manager. Should exterior work such as window replacement or roofing repairs be required within 500 feet (horizontal or vertical) of an active raptor or special-status species nest, or within 300 feet of any other protected species nest, the contractor shall cease work until the nest has been abandoned. Alternatively, the contractor should contact the USFWS San Francisco field office to establish a reduced buffer zone around the species to allow work to continue.</p>	<p>Impacts to nesting birds including raptors</p>
<p>Health and Safety Plan</p>	<p>The construction contractor would implement a Health and Safety Plan to ensure appropriate safety measures are implemented during construction.</p> <p>The Health and Safety Plan shall address personal protective equipment (PPE) and decontamination requirements while handling and disposing of hazardous materials, as well as proper disposal of investigation-derived waste. In addition, if there are sub-contractors, they shall follow the requirements of the Health and Safety Plan.</p>	<p>Public Health and Safety</p>
<p>Compliance with regulatory and industry geotechnical standards</p>	<p>The Proposed Action would comply with applicable regulatory and industry geotechnical standards, including International Building Code/California Building Code seismic parameters into the project design.</p>	<p>Geologic Resources (seismic issues)</p>

### **2.2.2 No Action Alternative**

Under the No Action Alternative, the proposed limited scope repair and alteration work would not be implemented, and the existing buildings would remain in their current condition. The No Action Alternative would not meet the purpose and need for the Proposed Action; however, the No Action Alternative is carried forward for analysis in this EA to satisfy federal requirements for analyzing “no action” under NEPA (40 CFR 1502.14(d)). The No Action Alternative will be used to analyze the consequences of not undertaking the Proposed Action, not simply conclude no impact, and will serve to establish a baseline for comparison with impacts from the Action Alternative.

### **2.3 Permits and Approvals Needed**

Permits and approvals that would be obtained for the Proposed Action are listed below:

- Street Space and Building Permits issued by the City of San Francisco

### **3. AFFECTED ENVIRONMENT; ENVIRONMENTAL CONSEQUENCES; AND AVOIDANCE MINIMIZATION, AND/OR MITIGATION MEASURES**

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This chapter presents a description of the environmental resources, existing conditions, and an analysis of the potential environmental consequences of the Proposed Action (the Action Alternative) and the No Action Alternative.

All environmental resources were initially considered in this EA. In compliance with NEPA, CEQ, and GSA NEPA guidance, the following discussion of the affected environment and environmental consequences focuses only on those environmental resources considered potentially subject to impact: cultural and historic resources; air quality and greenhouse gas emissions; noise and vibration; transportation and parking; solid and hazardous wastes/materials; biological resources; and safety and occupational health.

Conversely, potential impacts to land use, hydrology and water resources; geology, soils and seismicity; land use; visual resources; and utilities were not analyzed in detail in this EA because negligible or no potential impacts would occur, as explained in the following paragraphs.

#### **Hydrology and Water Resources**

The Alternative Action would include limited repairs to the interior of the building and limited exterior repairs such as roofing and windows. The Proposed Action would not result in potential impacts related to drainage alteration, increased runoff volumes or velocities, storm drain capacity, and related hazards such as hydromodification and flooding. Implementation of the Proposed Action would not result in an increase of impervious surface area or corresponding increase in post-development runoff volumes and velocities, since the Proposed Action would not remove and replace existing surfaces, nor would it alter on-site drainage conditions.

The Proposed Action is subject to numerous regulatory requirements related to hydrology and water quality, including the federal Clean Water Act. Pursuant to GSA guidelines, implementation of Clean Water Act requirements also reflects the associated standards of the local permitting agency, the City of San Francisco. No short-term or operational long-term water quality impacts would occur as a result of the Proposed Action, based on conformance with applicable regulatory requirements and implementation of appropriate water quality BMPs during construction. No changes to the existing storm drain facilities in the vicinity of the Proposed Action are anticipated.

The Proposed Action is not located within the floodplain (City and County of San Francisco 2015). The Proposed Action includes limited repairs none of which would be expected to impact floodplain functions. Hydrology and water resources are not considered to be an issue for this Proposed Action and has therefore been eliminated from detailed study.

#### **Geology, Soils and Seismicity**

All work will be conducted within the existing footprint. No excavation is proposed. Ground disturbing activities would not be conducted as part of the Proposed Action. No impacts associated with the loss of geologic resources, including soil, soil erosion, or sedimentation are anticipated.

The subject site is underlain at depth by artificial fill, and is located within a seismically active area, with a history of destructive earthquakes. The vicinity of the subject site is susceptible to strong ground

motion and potentially liquefaction. No seismic or non-seismic impacts would occur as a result of the Proposed Action, based on compliance with applicable regulatory and industry geotechnical standards, including International Building Code and California Building Code seismic parameters. As such, geological impacts are not considered to be an issue for this Proposed Action and has therefore been eliminated from detailed study.

### **Land Use**

The Proposed Action is located in Downtown San Francisco, California within the Financial District, a 294-acre, dense and highly-urbanized environment. The Financial District is home to the City's financial institutions, law and real estate firms, and insurance companies. Recently coined "FiDi," it includes some of San Francisco's tallest buildings, including the Transamerica Pyramid and 555 California. Its main thoroughfare, Montgomery Street, is sometimes called "Wall Street of the West." (City and County of San Francisco 2019). The site is zoned as a C-2 Community Business and is adjacent to zoning districts that range from C-D-O Downtown-Office and RC-4 Residential-Commercial, High Density (San Francisco 2019). C-2 Districts serve several functions, and allow for a wider variety of goods and services to Residential areas of the City, both in outlying sections and in closer-in, more densely built communities.

Much of the land surrounding the Proposed Action is occupied by other buildings devoted to business and some residential apartment/condominium buildings. The Proposed Action consists of limited scope repairs, the majority of which will be to the interior of the buildings. There will be no change to the building footprint or operations and would not result in incompatibilities with existing or projected land uses around the Proposed Action. As such, impacts to land use is not considered to be an issue for this Proposed Action and has therefore been eliminated from detailed study.

### **Visual Resources**

NEPA provides general direction on the analysis of visual impacts by establishing that the federal government use all practicable means to ensure all Americans safe, healthful, productive, aesthetically and culturally pleasing surroundings (42 USC 4331[b][2]). Thus, a visual analysis should determine if and how a project's visual appearance would potentially substantially affect the public's view of the area, especially when those views are associated with important scenic, recreational, historic, and cultural resource values. The Proposed Action involves two historic buildings which are further discussed in section 3.1 regarding the potential historical impacts. The Appraisers Building and U.S. Custom House are historically conserved as required by its location in a historic view corridor. There may be short-term impacts to the visual setting due to construction-related activity. Visually, the building will be consistent with historical architecture and the limited repairs will not change access to surrounding views. As such, impacts to visual resources is not considered to be an issue for this Proposed Action and has therefore been eliminated from detailed study.

### **Utilities**

The Appraisers Building and the U.S. Custom House are supplied with normal utility electrical power by Pacific Gas & Electric. The Proposed Action includes limited electrical upgrades and elevator electrical repairs to the Appraisers Building and more electrical repairs to the U.S. Custom House to include elevator electrical upgrades, flooring, electrical capacity, and IT upgrades. Short-term and localized service disruptions could occur during repairs at the Appraisers Building and U.S. Custom House; however, any impacts would be temporary and likely avoided with proper planning.



Many of the proposed repairs are to improve building energy performance (e.g., replace curtain wall of Appraisers Building, plumbing repairs, mechanical equipment repairs, etc.). Design and construction of the proposed repair of the curtain wall would be consistent with prevailing energy conservation and efficiency requirements identified in GSA's Public Building Service (PBS) 100 (GSA 2017). Following repairs, the Proposed Action would not result in increased energy consumption over existing conditions. Since most of the repairs would be designed in compliance with the applicable energy regulations, energy efficiency is not considered to be an issue for this proposal and has therefore been eliminated from detailed study.

No utility conflicts are proposed that would impact a change in the level of service to other consumers in the area. No long-term increase in utility demand is anticipated. As such, impacts to utilities is not considered to be an issue for this Proposed Action and has therefore been eliminated from detailed study.

**The following environmental resource areas were analyzed in detail:**

### **3.1 Cultural and Historic Resources**

This discussion of cultural resources includes prehistoric and historic archaeological sites; historic buildings, structures, and districts; and physical entities and human-made or natural features important to a culture, a subculture, or a community for traditional, religious, or other reasons. Cultural resources can be divided into three major categories consisting of archaeological resources, architectural resources, and traditional cultural properties. These are described below:

- Archaeological resources (prehistoric and historic) are locations where human activity measurably altered the earth or left deposits of physical remains.
- Architectural resources include standing buildings, structures, landscapes, and other built-environment resources of historic or aesthetic significance.
- Traditional cultural properties may include archaeological resources, structures, neighborhoods, prominent topographic features, habitat, plants, animals, and minerals that American Indians or other groups consider essential for the preservation of traditional culture.

#### **3.1.1 Regulatory Setting**

Cultural resources are governed by federal laws and regulations, including the NHPA, Archeological and Historic Preservation Act, American Indian Religious Freedom Act, Archaeological Resources Protection Act of 1979, and the Native American Graves Protection and Repatriation Act (NAGPRA) of 1990. Sections 106 and 110 of the NHPA primarily define federal agencies' responsibility for protecting historic properties. Section 106 requires federal agencies to consider the effects of their undertakings on historic properties. Section 110 of the NHPA requires federal agencies to establish—in conjunction with the Secretary of the Interior—historic preservation programs for the identification, evaluation, and protection of historic properties. Cultural resources also may be covered by state, local, and territorial laws.

#### **3.1.2 Affected Environment**

Cultural resources listed in the NRHP or eligible for listing in the NRHP are "historic properties" as defined by the NHPA. The list was established under the NHPA and is administered by the National Park

Service on behalf of the Secretary of the Interior. The NRHP includes properties on public and private land. Properties can be determined eligible for listing in the NRHP by the Secretary of the Interior or by a federal agency official with concurrence from the applicable SHPO. A NRHP-eligible property has the same protections as a property listed in the NRHP. Historical properties include both archaeological and architectural resources.

The area of potential effect (APE) for cultural resources is the geographic area or areas within which an undertaking (project, activity, program or practice) may cause changes in the character or use of any historic properties present. The APE is influenced by the scale and nature of the undertaking and may be different for various kinds of effects caused by the undertaking. For the Proposed Action, GSA determined that the APE corresponds to the building footprints (see Figure 2). GSA is coordinating with the SHPO on the extent of the APE.

### 3.1.2.1 Prehistory - Archaeological Resources

No archaeological surveys have been done for archaeological resources within the APE (J. Lehman 2019). Any ground-disturbing activities within the APE could trigger further study to determine the potential for archaeological resources.

### 3.1.2.2 Historic Setting

In 1874, the first Appraisers and Immigration Building, a four-story brick warehouse structure designed by Alfred B. Mullet, Supervising Architect of the United States Treasury, was built on the site of the current Appraisers Building for the inspection of goods. Custom Houses have occupied the eastern end of this block since 1855, when the first of two Custom houses was built. The largest of the two, begun in 1906, still occupies the eastern portion of the block. During the late 1800s, the Port of San Francisco was still the largest port on the West Coast and the primary transfer point for international and domestic shipping. In 1939, when construction of the Appraisers Building was begun, freight and most goods were still shipped by sea, although truck transportation had become an increasingly important means of domestic transport.

### Architectural Resources – Appraisers Building

The Appraisers Building has been associated with events that have made a significant contribution to the broad patterns of American history. The building housed immigration and Custom agencies of the Federal government since its completion in 1944, and still retains associations with these functions of the government. Although substantially altered in 1985-88, the building embodies distinctive architectural characteristics spanning two significant periods in American architecture, the Depression and World War II, and is the work of an important American architect, Gilbert Stanley Underwood (GSA 2012, GSA 2019a).



Photo: Sansome Street façade, detail of entrance. Credit: Page & Turnbull (GSA 2012).

The Appraisers Building was listed on the National Register of Historic Places on August 13, 2013 (GSA 2019a). The design of the Appraisers Building included a one-story high base, creating a strong horizontally oriented division at the ground floor, with vertically-oriented bands of alternating windows

with spandrels above that emphasize the height of the building. The building is organized around a central elevator core, containing six passenger elevators that open into public elevator lobbies at all but the service floors. On the ground floor, the elevator lobby is located on axis with the entrance, and this entrance axis is oriented perpendicular to the main leg of the C-shaped, first-floor corridor. Stair wells are located at the intersections of the legs of the C-shaped corridors. This spatial organization, with slight variations due to the building's setbacks, is continued throughout the upper floors of the building. On the lower four floors, offices were located around the perimeter on the north, south and west; warehouse spaces were located on the east in the "glass shed" above the loading dock; and service rooms were located in the basement and loft floors and in interstitial spaces between the original warehouse space and the public corridors. On the upper floors, offices, laboratories and assorted work rooms are located around the entire perimeter of the floor plates (GSA 2012, 2019a).

Loading and receiving docks occupy almost the entire length of the First Floor base and are surmounted by a long metal canopy and a four-story high, glass and metal screen wall (aka, the "curtain wall") that enclose all of the building's original warehouse space. This screen wall is composed of steel awning windows alternating with metal panels, similar to the other windows and transoms of the building. The original ceramic exterior cladding was substantially altered in 1985-88 with the installation of new cladding overall and new windows at the First Floor. The new cladding, a combination of matte-finished and polished bands of granite at the base and pre-cast concrete panels above, is a loose adaptation of the original elevation treatment (GSA 2019a).

The vertical window bays culminate in pre-cast blocks with fretwork designs, cast and installed in 1985-1988 to resemble the original ceramic grilles, some of which pierced the parapet walls and penthouses. Some of the original entrance details include the wide, planar, gray granite surround with polished black granite jambs, surmounted by an eagle carved by Lombard & Ludwig, architectural sculptors. The transoms and the original exterior doors, and the interior doors of the original vestibule were removed and replaced with a new plane of doors in the same plane as the original. Original vestibule material remains as exterior material: salmon-colored terrazzo with brass division strips; travertine wall cladding and marble baseboards; and two wall mounted building directories (GSA 2019a).

Significant historic interior features of the building include the first floor lobby, ornamented with patterned, salmon-colored terrazzo flooring; Montana travertine wall cladding; bronze elevator doors with fretwork details; and additional decorative bronze elements. The finishes of the elevator lobbies on the upper floors are more modest and include terrazzo flooring and cream-colored ceramic tile. The corridors also have terrazzo flooring, though with painted plaster walls and ceilings. The Custom Court on the Fourth Floor, with its book-matched walnut paneling and built-in furnishings, remains essentially intact except for changes in lighting (GSA 2019a).



Photo: Appraisers Building Lobby. Credit: Page & Turnbull (GSA 2012).

### Architectural Resources – U.S. Custom House

The 1906-1911 San Francisco Custom House is an important civic landmark which symbolizes the Federal government's responsibility for the regulation of foreign trade and the collection of revenue. In 1905, a national competition for the design of a new custom house in San Francisco resulted in the selection of a submission by the architectural firm of Eames and Young. Ground was broken for the construction of the San Francisco Custom House on January 28, 1906 and excavations were completed before the earthquake and fire of April 18-21 of that year. The City's business and financial district was almost completely destroyed by the fire, with the exception of a few buildings such as the Appraisers Building where the Custom records were stored during construction of this building. Construction resumed almost immediately after the fire, however labor and material shortages delayed completion until 1911. The building still houses custom offices, in addition to a post office and other assorted Federal offices (GSA 2019b). The U.S. Custom House Building was listed on the NRHP on January 29, 1975 (GSA 2019b).

The Custom House is a six-story building, including a full-height attic. The primary elevation, on Battery Street, is 265 feet long and the secondary elevations, on Jackson and Washington Streets, are 117 feet long. The main block of the building is U-shaped in plan, rising 95 feet to the mansard roof. This U-shaped office block surrounds a two-story pavilion, the Custom Hall and Post Office, which fronts on the alley. The pavilion, set off from the main portion of the building by light courts, is linked to the U-shaped office block by anterooms on three sides; this allows the Custom Hall to be naturally illuminated from two sides. The style of the building is Beaux Arts (GSA 2012, 2019b).



Photo: U.S. Custom House Roof. Credit: GSA c.2000 (GSA 2008).

The street fronts, clad in ashlar granite from Raymond, California, are bilaterally symmetrical and divided horizontally into a Classical, three-part composition. Granite entablatures and carving mark the primary and secondary entrances. Although similar to the Jackson and Washington Street entrances, the Battery Street entrance is distinguished as the main entrance by a figural grouping above the cornice. The Custom Hall and Post Office pavilion and the walls of the five-story portion surrounding the pavilion are clad in white, enameled brick. Both roofs are clad in slate and standing seam, copper sheet metal (GSA 2019b).

The main entrance sequence, typical of Beaux Arts interiors, passes through a relatively dark, marble-clad lobby and rises up the divided main staircases to the brightly-illuminated Custom Hall, located at the rear of the building. The Custom Hall interior, similar to the exterior, is treated like a pavilion: the walls and the ceiling are finished with an ornamental structural system executed in plaster and incorporating painted murals on canvas. The original chandeliers and skylights have been removed and replaced with artificial lighting panels. The two T-shaped, double-loaded corridors on the first floor, which serve the offices, intersect the main lobby near the staircases. The first floor corridors and the corridors on the upper floors are similar in treatment. The offices are also similar in finish treatments, except for the District Director's Office which is a suite of rooms distinguished by a higher level of detailing and more costly materials (GSA 2019b).



Photo: U.S. Custom House Hall. Credit: Page & Turnbull (GSA 2008).

### 3.1.3 Environmental Consequences

The proposed significance criteria includes irretrievable or irreversible damage to a prehistoric or historic site that is listed or is eligible for listing on the NRHP; the action results in changes to the characteristics of an historic property that qualified it for the NRHP; or an historic resource that has been identified as important to Native Americans, as outlined in the American Indian Religious Freedom Act; Executive Order 13007, Indian Sacred Sites, and other regulations or disturbs human remains, including those interred outside of formal cemeteries.

The analysis of potential impacts to cultural resources considers both direct and indirect impacts. Direct impacts may be the result of physically altering, damaging, or destroying all or part of a resource, altering characteristics of the surrounding environment that contribute to the importance of the resource, introducing visual, atmospheric, or audible elements that are out of character for the period the resource represents (thereby altering the setting), or neglecting the resource to the extent that it deteriorates or is destroyed. Indirect impacts are those that may result from a change in activity levels or other occurrence that was a byproduct of a proposed action, such as the effect of increased vehicular or pedestrian traffic near the resource.

#### 3.1.3.1 Proposed Action

Because no ground disturbing activities would occur as part of the Proposed Action, no impacts to any potential archaeological resources would occur.

Under the Proposed Action, the GSA would implement the proposed repairs, modifications, and replacements as presented in Table 2.1. These proposed activities would improve the condition of both buildings and be done in a manner to preserve the architectural integrity of both buildings. The proposed direct impacts to both buildings would not permanently alter, damage, destroy, or alter the characteristics of the buildings. No indirect impacts would occur.

Implementation of the Proposed Action would result in an overall beneficial effect to the buildings. GSA would implement the Proposed Action in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The Standards would direct the manner in which the historic

buildings are altered, in order to ensure that historic integrity would be retained and to ensure that the activities would be below the threshold of an adverse effect.

GSA is coordinating with SHPO requesting that SHPO concur with GSA's determination of No Historic Properties Affected for the Proposed Action. Therefore, implementation of the Proposed Action would result in beneficial impacts to cultural resources.

### **3.1.3.2 No Action Alternative**

Under the No Action Alternative, there would be no change to existing conditions; historic materials would deteriorate. No repair to historic materials would occur (window repair and restoration, etc.). Notwithstanding GSA's best efforts to safeguard the building, implementation of the No Action Alternative would result in the deterioration of historic fabric and decay of the buildings over the long-term. Therefore, existing features on both buildings would continue to degrade, diminishing the architectural elements of both buildings and resulting in adverse impacts to cultural resources.

### **3.1.4 Avoidance, Minimization and/or Mitigation Measures**

The Proposed Action would be implemented in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties as codified in 36 CFR 68.

## **3.2 Air Quality and Greenhouse Gas Emissions**

Under the Clean Air Act (CAA) and subsequent regulations, the USEPA has divided the country into geographical regions known as Air Quality Control Regions (AQCRs) to evaluate compliance with national ambient air quality standards (NAAQS). The Proposed Action is located in the City of San Francisco, which is located in the San Francisco Bay Area AQCR. The region of influence for air quality is considered to be the San Francisco Bay Area AQCR.

GHGs are chemical compounds in the Earth's atmosphere that trap heat in the atmosphere, thus regulating the Earth's temperature. Gases exhibiting greenhouse properties come from natural and human sources. Water, vapor, carbon dioxide, methane, and nitrous oxide are examples of GHGs that have natural and manmade sources, while other gases such as those used for aerosols are exclusively manmade. This subchapter evaluates potential environmental effects related to air quality and GHG emissions as a result of the Proposed Action.

### **3.2.1 Regulatory Setting**

Construction activities at the Appraisers Building and U.S. Custom House are regulated by USEPA, the California Air Resources Board (CARB), and the Bay Area Air Quality Management District (BAAQMD). The BAAQMD is the local air quality district with the ability to issue permits, prohibit activity emissions and set local standards. BAAQMD is one of the most regulated air quality districts in the nation. Applicable emissions regulations for the Proposed Action include those that regulate emission of criteria pollutants and toxic air contaminants (TACs).

Odors are not addressed because the Proposed Action would not result in new sources of smells/odors generally considered nauseating (e.g., landfills, sewage treatment plants, etc.)

**3.2.1.1 Clean Air Act (CAA), Criteria Pollutants, and General Conformity Rule**

The CAA of 1970, 42 USC Section 7401 et seq. amended in 1977 and 1990, is the primary federal statute governing air pollution. One purpose of the CAA is to establish NAAQS and classify areas as to their attainment status relative to NAAQS. Attainment is the achievement of ambient concentrations below specified levels determined to be protective of human health by the USEPA. In addition, the CAA has a purpose to develop schedules and strategies to meet the NAAQS; and to regulate emissions of criteria pollutants and air toxics to protect public health and welfare. Under the CAA, individual states can adopt additional ambient air quality standards, provided they are at least as stringent as the Federal standards, which the CARB has set for the State of California. The six criteria pollutants for the NAAQS are: particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>2</sub>), lead (Pb), and ozone (O<sub>3</sub>). SO<sub>2</sub> and NO<sub>2</sub> are often referred to as SO<sub>x</sub> and NO<sub>x</sub> in emissions models to represent various oxide states of those pollutants.

The General Conformity Rule (40 CFR 51.850-.860 and 40 CFR 93.150-.160) requires any federal agency responsible for an action in a nonattainment area or maintenance area to determine that action conforms to the appropriate State Implementation Plan or that the action is exempt from the General Conformity Rule requirements. The attainment status and NAAQS for all criteria pollutants that are both federal and California listed are provided in Table 3.1.

**3.2.1.2 Toxic Air Contaminants (TACs)**

TACs refer to a category of air pollutants regulated in the BAAQMD that may pose an acute risk to human health. Federal regulations regulate a shorter list of air pollutants that may pose a risk to human health known as hazardous air pollutants (HAPs). Most HAPs are TACs, but not all TACs are HAPs. TACs have a more localized impact than criteria pollutants. Stationary sources of TACs are regulated directly through emissions standards and permits such as emission requirements for construction equipment and limits on the Volatile Organic Compound (VOC) content of paint (BAAQMD 2017c). TACs are represented in the emissions estimates as part of PM<sub>10</sub>, PM<sub>2.5</sub>, and VOC emissions in the calculations.

**Table 3.1 Ambient Air Quality Standards and Designations**

Pollutant	Averaging Time	California		National Standards[a]		
		Standards [b, c]	Attainment Status [d]	Primary [c, e]	Secondary [c, f]	Attainment Status [g]
Ozone (O <sub>3</sub> )	1-hour	0.09 parts per million (ppm) (180 µg/m <sup>3</sup> )	N (Serious)	- [h]	Same as Primary Standard	- [h]
	8-hour	0.070 ppm (137 µg/m <sup>3</sup> )	-	0.075 ppm (147 µg/m <sup>3</sup> )		N
Carbon Monoxide	1-hour	20 ppm (23 mg/m <sup>3</sup> )	A	35 ppm (40 mg/m <sup>3</sup> )	-	U/A
	8-hour	9 ppm (10 mg/m <sup>3</sup> )		9 ppm (10 mg/m <sup>3</sup> )		
Nitrogen Dioxide (NO <sub>2</sub> )	Annual Arithmetic Mean	0.030 ppm (57 µg/m <sup>3</sup> )	-	35 ppm (40 mg/m <sup>3</sup> )	Same as Primary Standard	U/A
	1-hour	0.18 ppm (339 µg/m <sup>3</sup> )	A	0.053 ppm (100 µg/m <sup>3</sup> )		-
Sulfur Dioxide (SO <sub>2</sub> )	Annual Arithmetic Mean	-	-	0.030 ppm (80 µg/m <sup>3</sup> )	-	A
	24-hour	0.04 ppm	A	0.14 ppm		

Pollutant	Averaging Time	California		National Standards[a]		
		Standards [b, c]	Attainment Status [d]	Primary [c, e]	Secondary [c, f]	Attainment Status [g]
		(105 µg/m <sup>3</sup> )		(365 µg/m <sup>3</sup> )		
	3-hour	-	-	-	0.5 ppm (1300 µg/m <sup>3</sup> )	
	1-hour	0.25 ppm (655 µg/m <sup>3</sup> )	A	-	-	-
Respirable Particulate Matter (PM <sub>10</sub> )	Annual Arithmetic Mean	20 µg/m <sup>3</sup>	N	- [h]	Same as Primary Standard	U
	24-hour	50 µg/m <sup>3</sup>		150 µg/m <sup>3</sup>		
Fine Particulate Matter (PM <sub>2.5</sub> )	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	N	- [h]	Same as Primary Standard	N [i]
	24-hour	-	-	150 µg/m <sup>3</sup>		
Lead [i]	30-day Average	1.5 µg/m <sup>3</sup>	A	-	-	-
	Calendar Quarter	-	-	1.5 µg/m <sup>3</sup>	Same as Primary Standard	-

[a] National standards are not to be exceeded more than once a year.  
 [b] California standards for ozone, CO (except Lake Tahoe), SO<sub>2</sub> (1- and 24-hour), NO<sub>2</sub>, PM, and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded.  
 [c] Concentration expressed in units in which it was first promulgated.  
 [d] Unclassified (U): a pollutant is designated unclassified if the data are incomplete and do not support a designation of attainment or nonattainment. Attainment (A): a pollutant is designated attainment if the state standard for that pollutant was not violated at any site in the area during a 3-year period. Nonattainment (N): a pollutant is designated nonattainment if there was at least one violation of a state standard for that pollutant in the area.  
 [e] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect public health.  
 [f] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.  
 [g] Nonattainment (N): any area that does not meet (or that contributes to ambient air quality in a nearby area that does not meet) the national primary or secondary ambient air quality standard for the pollutant. Attainment (A): any area that meets the national primary or secondary ambient air quality standard for the pollutant.  
 [h] The 1-hour ozone NAAQS was revoked on June 15, 2005 and the annual PM<sub>10</sub> NAAQS was revoked in 2006.  
 [i] CARB has identified lead and vinyl chloride as toxic air contaminants with no threshold of exposure for adverse health effects determined.  
 [j] USEPA lowered the 24-hour PM<sub>2.5</sub> standard from 65 µg/m<sup>3</sup> to 35 µg/m<sup>3</sup> in 2006.  
 Source: BAAQMD 2017b.

### 3.2.1.3 Regulation of Greenhouse Gases (GHG) under the CAA

GHGs are generated by both naturally occurring and man-made activities such as normal atmospheric activity, vehicle use, building heating and cooling, electricity generation, and other sources of combustion. Naturally occurring greenhouse gases include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrogen dioxide (N<sub>2</sub>O). Man-made gases in addition to CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O include hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>). Atmospheric concentrations of both the natural and man-made gases have been rising over the last few centuries due to the industrial revolution (NOAA 2019).

In June 2019 the CEQ issued draft guidance for Consideration of GHG Emissions in NEPA Analysis. This guidance is a replacement for the prior Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change on National



Environmental Policy Act Reviews which was withdrawn in April 2017. The June 2019 draft guidance recommends Agencies provide a quantitative estimate of GHG when resources are reasonably available, and that the Agency may compare the quantitative estimates to local, regional, national or sector wide GHG emissions to evaluate for significance.

### 3.2.2 Affected Environment

The Appraisers Building and U.S. Custom House are in the San Francisco Bay Area Air Basin (SFBAAB). The climate of the SFBAAB is characterized by complex terrain and is dominated by the strength and location of a semi-permanent, subtropical high-pressure cell. In the summer, the cell results in stable meteorological conditions and a steady northwesterly wind flow. In the winter, the cell weakens and shifts southward resulting in wind flow offshore. The moderate winds and weak inversions result in a low air pollution potential from atmospheric conditions (BAAQMD 2017c).

The SFBAAB is in National nonattainment for the criteria pollutants O<sub>3</sub>, and PM<sub>2.5</sub> and California PM<sub>10</sub>, also stated in Table 3.1. Levels of O<sub>3</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> vary daily in the SFBAAB. Air quality monitoring stations across the Bay Area managed by BAAQMD record air quality. The BAAQMD calculates the days of exceedance of National and California Standards by year. The past three years are summarized in Table 3.2 (BAAQMD 2018).

**Table 3.2 2018 Bay Area Summary of Days Over National & California Air Quality Standards**

Standard	Number of Days Over Standard 2016	Number of Days Over Standard 2017	Number of Days Over Standard 2018
California O <sub>3</sub> 1-hour	6	6	2
California O <sub>3</sub> 8-hr	15	6	3
National O <sub>3</sub>	15	6	3
California PM <sub>10</sub>	0	6	6
National PM <sub>10</sub>	0	0	1
National PM <sub>2.5</sub>	0	18	18

Source: BAAQMD 2018.

Additionally, BAAQMD has quantified the local GHG emissions. The newest published GHG inventory for the BAAQMD is presented in Table 3.3 (BAAQMD 2015).

**Table 3.3 Bay Area GHG Emissions 2011 Inventory by Sector San Francisco County**

Sector	2011 Emissions (Million Metric Tons CO <sub>2</sub> -Equivalent per Year)
Industrial/Commercial	1.2
Residential Fuel	0.9
Electricity/Co-Generation	0.5
Off-Road Equipment	0.2
Transportation	3.0
Agriculture/Farming	0.0
Total	5.4

Source: BAAQMD 2015.

Sensitive receptors for air quality impacts are those persons that are the most sensitive to pollution effects, such as the very young, elderly, or people with respiratory and other related illnesses. The Appraisers Building and U.S. Custom House function as government buildings and may host

compromised individuals. Also, the buildings are located in the financial district of San Francisco which has many mixed uses including residential apartments, parks, day cares, and medical offices within a few blocks. Therefore, many nearby sensitive receptors may be present. However, the area has been urbanized since the early 1900's.

The Appraiser Building and U.S. Custom House may have asbestos containing material in the elements that are intended to be renovated. See section 3.5, Solid and Hazardous Wastes/Materials for more details.

### **3.2.3 Environmental Consequences**

The proposed significance criteria is based on the standards that apply to SFBAAB. Because the SFBAAB is in Federal nonattainment for O<sub>3</sub> and PM<sub>2.5</sub>, a General Conformity Rule applicability analysis is necessary. The General Conformity Rule sets applicability requirements for projects subject to the Rule through establishment of *de minimis* levels for annual criteria emissions applicable to the air basin. The thresholds for significance evaluated in this analysis are called *de minimis* thresholds, which are 50 tons per year for VOCs, and 100 tons per year individually of NO<sub>x</sub> or PM<sub>2.5</sub>. O<sub>3</sub> does not directly have a threshold because O<sub>3</sub> is not directly emitted, instead O<sub>3</sub> is generated in the atmosphere as a chemical reaction. The precursors to O<sub>3</sub> are VOCs and NO<sub>x</sub>. PM<sub>10</sub> is also evaluated against a 100 ton per year threshold due to SFAAB's California designation as nonattainment. The BAAQMD also sets a guidance threshold for daily emissions for proposed actions for criteria pollutants.

For GHG, while not stated in the 2019 draft CEQ guidance, the threshold for significance for the Proposed Action will likely use the reporting requirement from USEPA's Greenhouse Gas Reporting Program of 25,000 metric tons of carbon dioxide equivalents per year as the de facto threshold. BAAQMD recommends an operational related threshold of 10,000 metric tons of CO<sub>2</sub>-Equivalents (CO<sub>2</sub>-E), where all GHG are converted to the equivalent of that gas's greenhouse potential in units of CO<sub>2</sub> (BAAQMD 2017c).

#### **3.2.3.1 Proposed Action**

Emissions from the Proposed Action would consist of short-term emissions during the construction phase. During construction, short-term degradation of air quality may occur due to the operation of diesel, gasoline, and propane powered construction equipment. Dust may be generated during periods of selective building repairs (PM<sub>10</sub> and PM<sub>2.5</sub>) and renovation activities. Use of heavy trucks would increase in the immediate surrounding area for delivery of supplies and removal of debris.

The Proposed Action does not include any changes to the operation of the buildings from the standpoint of changes in air emissions. The repairs may include modifications to the buildings' heating, cooling, and exhaust systems; however, no increases in combustion units (i.e. furnaces or emergency generators) size or number are anticipated. Therefore, for the purposed of the Air Quality analysis, no change to operational emissions are estimated.

Estimated pollutant emissions resulting from the proposed construction were modeled using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 software, a modeling platform recommended by the CARB and accepted by the BAAQMD. CalEEMod is a land use emissions computer model, purpose built for California. It uses widely accepted methodologies for estimated emissions and includes vetted default values for use in the model when project specific information is not available. The construction time periods and estimates for the use and number of construction equipment are

based on information developed during the GSA's planning phase of this project. The actual construction time periods, equipment and crews utilized will be subject to the contractor selected to complete the work and local constraints. CalEEMod was run with conservative estimates to ensure emissions estimated would reflect a multitude of work scenarios on the Appraisers Building and U.S. Custom House and not underestimate the yearly potential emissions. A complete listing of the model results is available in Appendix C.

Table 3.4 summarizes the estimated average annual criteria pollutant emissions during construction activities for the Proposed Action (over a 24-month construction duration period) and the *de minimis* thresholds and BAAQMD guidance threshold used for analysis. Table 3.5 summarizes the estimated average annual GHG pollutant emissions during the construction activity. Construction in 2022 and 2024 are estimated as partial year construction. For the purpose of modeling, most demolition was modeled to be completed in 2022 and 2023; however, actual construction schedules could modify that. Model results indicate emissions well below thresholds of significance. Therefore, even if activities occur in different years than modeled, the Proposed Action would not impact air quality.

During construction there will be localized increased emissions of TACs such as diesel particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) and increased CO from heavy equipment, cranes, and trucks used to deliver supplies and remove debris. Sensitive receptors may experience a small adverse effect if they are present along the immediate vicinity of the work zone for an extended period. Otherwise, emissions will remain similar to the baseline urban environment.

Asbestos containing material will be abated prior to repair activities in accordance with state and Federal laws which will minimize the release of asbestos fibers. Asbestos containing material, including friable asbestos (material that may be loose and readily enter the air) and non-friable asbestos (material that requires grinding or sanding to be released) will be assessed by a professional and qualified firm prior to the development of mitigation plans. Therefore, there is no anticipated significant impact from asbestos remediation.

### **3.2.3.2 No Action Alternative**

Under the No Action Alternative, there would be no change to existing conditions. Therefore, implementation of the No Action Alternative would not impact air quality.

### **3.2.4 Avoidance, Minimization and/or Mitigation Measures**

No significant air quality impacts of GHG emissions from implementation of the Proposed Action are anticipated; therefore, no avoidance, minimization, or mitigation measures are required. However, BAAQMD recommends the inclusion of management measures to demonstrate further efforts to minimize air pollutant emissions (BAAQMD 2017c).

The following are air quality management measures/basic construction mitigation measures recommended by BAAQMD for all proposed projects:

- The GSA's construction contractor would implement the following basic construction measures during construction:
  - All haul trucks transporting loose material off-site shall be covered.

- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

**Table 3.4 Estimated Criteria Pollutant Emissions Resulting from the Proposed Action**

Construction Activity	Average Annual Emissions									
	ROG/VOC [a]		NO <sub>x</sub> [a]		PM <sub>10</sub>		PM <sub>2.5</sub> [b]		CO	SO <sub>x</sub>
	lbs/day [c]	tpy	lbs/day	tpy	lbs/day	tpy	lbs/day	tpy	tpy	tpy
2022 Total Emissions	2	0.1	24	1.2	6	0.3	1	0.04	0.9	<0.01
2023 Total Emissions	38	5.7	15	2.3	3	0.4	1	0.14	2.4	<0.01
2024 Total Emissions	2	0.1	14	0.7	2	0.1	1	0.03	0.8	<0.01
<i>de minimis</i> Threshold (Per Year)	-	50	-	100	-	N/A	-	100	N/A	N/A
Construction Emissions Exceed <i>de minimis</i> Threshold?	-	No	-	No	-	N/A	-	No	N/A	N/A
BAAQMD guideline – construction	54	-	54	-	82	-	82	-	None	None
Construction Emissions Exceed BAAQMD guideline?	No	-	No	-	No	-	No	-	No	No

Notes: Numbers rounded to nearest one-tenth except for PM<sub>2.5</sub>, which is rounded to nearest hundredth. If the value is less than 0.01, <0.01 is used in the table. N/A = not applicable; tpy = tons per year; lbs/day = pound per day.  
 [a] ROG = Reactive Organic Gas. NO<sub>x</sub> and VOC/ROG are precursors to O<sub>3</sub>. Emissions are calculated using CalEEMod, utilizing overall unmitigated construction (model output 2.1) for construction. See Appendix C.  
 [b] For conservative assessment purposes, PM<sub>2.5</sub> emissions utilize CalEEMod partitioning of PM emissions.  
 [c] Pounds per day calculated by converting tons per year to pounds per year, then dividing by conservative days worked per year of 2022 = 100 days, 2023 = 300 days, 2024 = 100 days.  
 Source: CalEEMod model results for unmitigated construction. See Appendix C for model outputs.

**Table 3.5 Estimated GHG Emissions Resulting from the Proposed Action**

Construction Activity	Emissions (MT/Year)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	Total CO <sub>2</sub> -E
2022 Total Emissions	234	<1	<1	235
2023 Total Emissions	517	<1	<1	519
2024 Total Emissions	156	<1	<1	157
Screening Reference Level (National)	-	-	-	25,000
Screening Reference Level (BAAQMD)	-	-	-	10,000
Construction Emissions Exceed Screening Levels?	-	-	-	No
Percentage of San Francisco County GHG Emissions for Industrial/Commercial (1.2 million MT CO <sub>2</sub> -E)	-	-	-	0.01%

Notes: Number rounded to nearest 1 MT. If the value calculated by the model is under 1 MT, <1 is utilized. N/A = Not applicable; MT = Metric tons [a] CO<sub>2</sub> equivalents. All CH<sub>4</sub> and N<sub>2</sub>O emissions converted to their equivalent GHG impacts to CO<sub>2</sub> and added to CO<sub>2</sub> emissions.  
 Source: CalEEMod model results. See Appendix C for model outputs.

### **3.3 Noise and Vibration**

Noise is defined as unwanted or annoying sound that interferes with or disrupts normal human activities. Although continuous and extended exposure to high noise levels (e.g., through occupational exposure) can cause hearing loss, the principal human response to noise is annoyance. The response of different individuals to similar noise events is diverse and is influenced by the type of noise, perceived importance of the noise, its appropriateness in the setting, time of day, type of activity during which the noise occurs, and sensitivity of the individual.

#### **3.3.1. Regulatory Setting**

##### **3.3.1.1 Noise**

Federal agencies must comply with applicable federal, state, interstate, and local noise control regulations in accordance with The Noise Control Act of 1972 (Public Law 92-574). Noise levels in San Francisco, including the Proposed Action site, are guided by policies and standards set by the City of San Francisco in the San Francisco Police Code Article 29. The City's Noise Ordinance establishes maximum permissible sound levels at specific times of the day for both operational and construction noise. For the Proposed Action, no changes to the existing operations are proposed and only construction activities are evaluated in this EA. Section 2907 of the San Francisco Police Code Noise Ordinance limits construction noise to an average sound level of 80 dBA (A-weighted decibels) Leq (equivalent continuous sound level) at 100 feet from the affected property line during the 12-hour period from 7:00 A.M. to 8:00 P.M. (City and County of San Francisco 2014). Construction activities are prohibited between the hours of 8:00 P.M. and 7:00 A.M. and on Sundays and legal holidays, except in the case of emergency or if a permit has been obtained from the Department of Building Inspection or the Department of Public Works.

##### **3.3.1.2 Vibration**

Vibration effects are guided by findings of the Transportation and Construction Vibration Guidance Manual (California Department of Transportation [Caltrans] 2013), which provides direction for addressing ground vibration issues from construction and operational vibration sources. Vibration associated with construction activities are evaluated in this EA.

#### **3.3.2. Affected Environment**

The physical characteristics of noise include its level, frequency, and duration. Noise is measured in decibels (dB) with zero dB being the least perceptible sound to more than 130 dB, the level at which noise becomes a health hazard. Because the human ear is more sensitive to certain ranges of the sound spectrum, the A-weighted scale has been developed to more accurately reflect what the human ear perceives. These measurements are adjusted into units known as A-weighted decibels and is expressed in units of dBA.

##### **3.3.2.1 Sensitive Noise Receptors**

Sensitive noise receptors can be defined as children, the elderly, people with illnesses, or others who are especially sensitive to the effects of noise. Hospitals, schools, day care and convalescent facilities, and residential areas are examples of facilities or areas that may house or attract sensitive receptors. This EA has identified the following potentially sensitive noise receptors within 100 feet of the Proposed Action: Breakthrough Collaborative, a college preparatory school serving underprivileged

communities, is located at 545 Sansome Street, approximately 100 feet from the nearest corner of the Appraisers Building at Sansome and Washington Streets.

**3.3.2.2 Construction Noise**

Noises can fluctuate over time. For example, mobile sources of noise such as a large delivery truck emanating noise levels which are perceived to increase and decrease as the truck approaches, arrives, then departs. The receptor generally experiences the loudest noises when the vehicle arrives. Once the vehicle departs the noise gradually fades away to imperceptible levels. Because of the variation, one of the most common noise metrics for environmental noise is calculated using an average noise level called equivalent noise levels (Leq). Noise level calculations for construction equipment uses an average period of one hour and assumes that noise levels and fluctuations created in any one hour of a workday is more or less the same as any other hour for the same type of equipment. Typical construction assumes standard construction and demolition practices. Construction-related equivalent noise emissions (listed in Table 3.6) can range from 70 to 82 dBA when measured 50 feet from the respective piece of equipment.

**Table 3.6 Typical Construction Related Noise Emissions**

Equipment Description	Actual Measured $L_{max}$ at 50 feet (dBA)	Equivalent Noise Level Leq at 50 feet (dBA)
Flat Bed Truck	74	70
Welder/Torch	74	70
Dump Truck	76	73
Backhoe	78	74
Compressor (air)	78	74
Crane (mobile)	81	73
Generator	81	78
Warning Horn	83	70
Pneumatic Tools	85	82
Jackhammer	88-90	82
<i>Source:</i> Derived from Federal Highway Administration Construction Noise Handbook (FHWA 2006)		

The subject properties are located in a densely developed urban center in the Financial District of San Francisco. The ambient noise levels in the vicinity of the Proposed Action is similar to the noise levels in many similar densely developed urban centers. Downtown city noise levels can range from 75 to 80 dBA and sometimes as high as 90 dBA when situated next to a freeway. There are no freeways near the proposed area, so ambient noise levels would be closer to the lower range of 75 dBA (USEPA 1974). Occupants of buildings commonly experience vibration from numerous sources including motor vehicles, aircraft, street repair (such as jackhammer, backhoes, etc.) and other construction activities.

### **3.3.3. Environmental Consequences**

The proposed significance criteria relating to noise is the San Francisco Noise Ordinance construction noise threshold of 80 dBA. The proposed significance criteria relating to human perception of vibration annoyance ranges as severely perceptible of 2.0 peak particle velocity (PPV) (in/sec) from transient sources such as blasting, to 0.4 PPV (in/sec) for continuous/frequent intermittent sources such as impact pile drivers or vibratory compaction equipment (Caltrans 2013).

#### **3.3.3.1 Proposed Action**

Under the Proposed Action, most construction would be confined to repairs inside the buildings with the exception of repairs such as the curtain wall, roofing, and window repair. The loudest outdoor construction equipment required for installing the curtain wall would be a mobile crane operating between the buildings in the alleyway. The nearest known sensitive noise receptor is located at 545 Sansome Street, approximately 100 feet from the corner of the Appraisers Building but approximately 200 feet from the alley where the crane would be working on the curtain wall. Temporary noise levels due to crane operations would be 73 dBA Leq at 50 feet but would decrease with distance at an attenuation of 6 dB per doubling of distance to levels (estimated 61 dBA Leq at 200 feet from the source) below City of San Francisco noise level limits of 80 dBA Leq. Noise levels would therefore dissipate to nearly imperceptible levels (above ambient levels) at the outside of the building at 545 Sansome Street which houses the Breakthrough Collaborative. Within the building, noise would be further reduced. With windows closed, noise levels would decrease by as much as 25 dBA (FICAN 1997). Other outdoor construction activities including roofing and window repair would not entail the use of heavy construction machinery such as blasting or pile drivers and would remain in compliance with the San Francisco Noise Ordinance construction noise threshold of 80 dBA and vibration thresholds. Occupants of the subject property are likely to perceive short-term, intermittent periods of surficial vibration from construction activities. Although tenants of the buildings would continue to work in the buildings during the repair work, they may be relocated to other sections of the buildings as necessary for safety, including noise and vibration. However, there would be no heavy construction equipment proposed that would generate ground vibration impacts. Therefore, impacts due to noise would be less than significant.

#### **3.3.3.2 No Action Alternative**

Under the No Action Alternative, there would be no change to existing conditions. Therefore, implementation of the No Action Alternative would not generate new noise impacts.

### **3.3.4. Avoidance, Minimization and/or Mitigation Measures**

Although noise levels would be less than significant, noise minimizing measures could be employed. Typical noise best management practices to minimize noise from construction equipment such as the proposed crane for installing the curtain wall, would be as follows.

- Properly outfit and maintain construction equipment with manufacturer recommended noise reduction devices to minimize construction-generated noise.
- Operate diesel equipment with closed engine doors and equip with factory recommended mufflers.
- Prohibit unnecessary idling of internal combustion engines (e.g., in excess of 5 minutes).



- Locate material stockpiles and mobile equipment staging, parking, and maintenance areas as far as practicable from noise sensitive receptors.
- Limit use of noise-producing signals, including horns, whistles, alarms, and bells, for safety warning purposes only.
- Receive and resolve noise complaints (i.e., this is the responsibility and under the authority of the on-site construction supervisor).
- Use designated truck routes designed to minimize impacts on residential areas and sensitive receptors for vehicles used to haul materials or traveling to and from the site shall use designated truck routes.

### **3.4 Transportation and Parking**

Transportation refers to the movement of people and goods on a multi-modal transportation network, consisting of roads, transit services, bicycle lanes, and other transportation facilities. Roads are commonly classified based on the intended function of the roadway in terms of land use access, travel distance and speed, and connections to other roadways. Interstate highways and other freeways are designed to maximize travel distance and speed while providing minimal or no access to fronting land uses. By contrast, local roads provide direct access to all adjacent property while have substantially lower speeds than freeways or arterial highways. Transit facilities consist of local and regional bus services and both light rail and heavy rail transit.

#### **3.4.1. Regulatory Setting**

The project is a federal action whose impacts to transportation and parking are subject to NEPA and are therefore considered in this EA. NEPA review of recurring traffic-related effects is typically done using procedures described in the Highway Capacity Manual (Transportation Research Board 2016). Highway Capacity Manual procedures involve the calculation of Level of Service (LOS), which is a rating of performance of transportation facilities (i.e., roadways, intersections, freeway segments, etc.) on a scale of A through F. LOS is primarily concerned with effects on vehicular traffic and is not widely used on other modes of travel, such as transit. The Proposed Action is located in the City and County of San Francisco, which has eliminated LOS as a metric for determining traffic effects as part of California Environmental Quality Act (CEQA) environmental review and replaced with Vehicles Miles Traveled (VMT), in accordance with California Senate Bill 743 (SB 743). Although CEQA does not apply to this Proposed Action because it is a federal action, the discussion of environmental consequences in the paragraphs that follow considers impacts to vehicular traffic, parking, and VMT in accordance with SB 743.

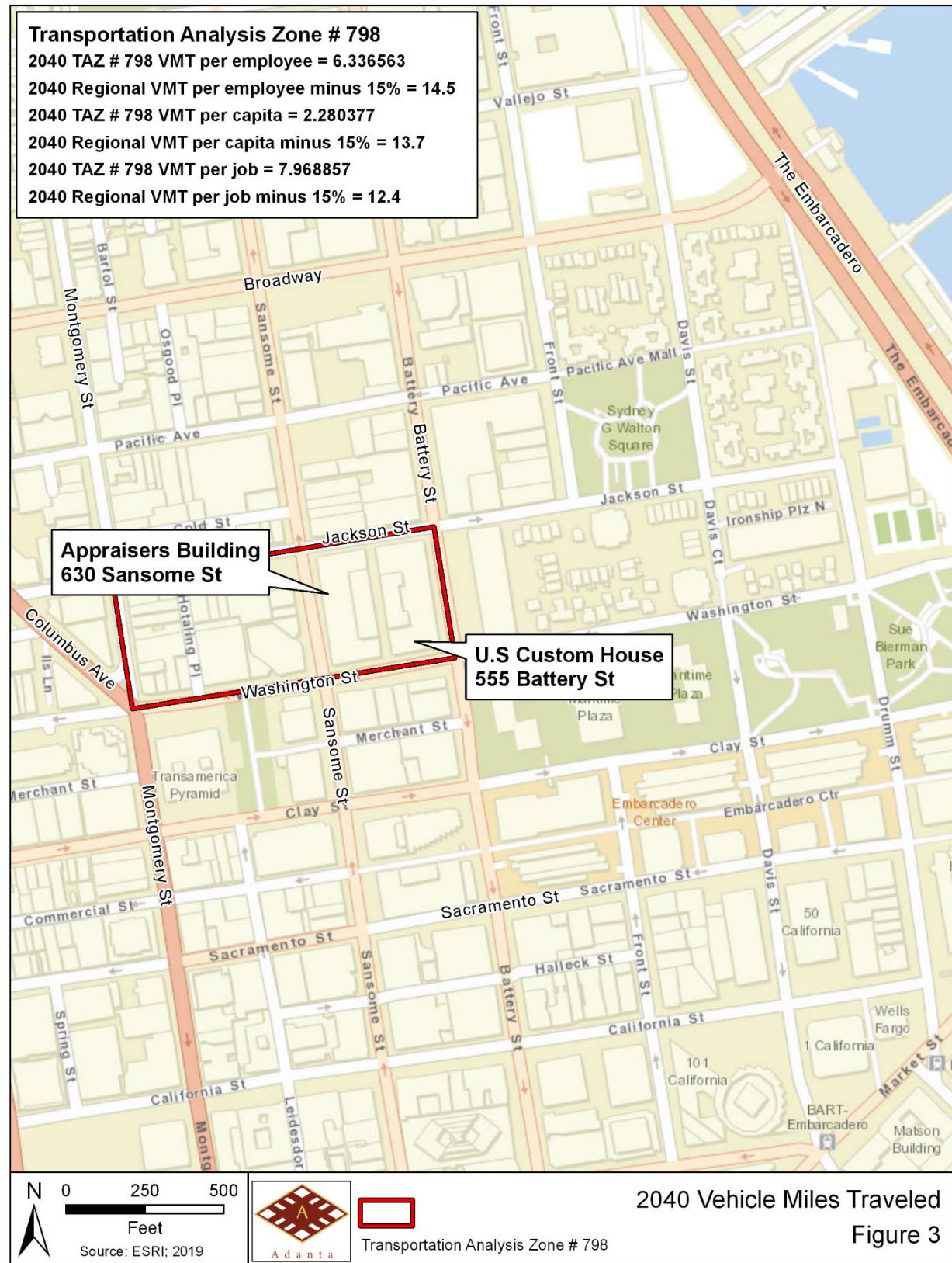
#### **3.4.2. Affected Environment**

The Proposed Action is located in the Financial District of San Francisco, a dense and highly-urbanized environment. The existing transportation network accommodates a variety of modes for access, including pedestrians, passenger cars, transit vehicles, and bicyclists. The San Francisco Municipal Transit System (Muni) operates various transit facilities, including buses, light rail, historic streetcars, and cable cars. In the project area, Muni provides local transit services via routes 41, 10, 12, and 30X. Regional heavy rail service is provided by Bay Area Rapid Transit (BART) via the Embarcadero Station, which is located approximately 0.5 miles from the Proposed Action. The Embarcadero Station serves the following BART lines:

- Red Line (Richmond – Millbrae)
- Yellow Line (Antioch – San Francisco Airport/Millbrae)
- Blue Line (Dublin/Pleasanton – Daly City)
- Green Line (Warm Springs/South Fremont – Daly City)

Transit services are coordinated, and transit operators use advanced technology to track vehicles and convey to transit riders the time of the next vehicle at each stop. Access to the vicinity of the Proposed Action for passenger vehicles, buses, trucks, and other vehicles is provided by a network of surface streets. Vehicle parking facilities include on-street metered spaces and off-street surface lots and parking structures. The closest off-street facility is the 635 Sansome Street surface lot, which includes 10 spaces, and is operated by California Parking. Other nearby parking facilities include the 768 Sansome Street lot, the 439 Washington Street lot, and the 475 Sansome Street garage. Public parking around the perimeter of the Proposed Action sites is prohibited due to security reasons. Parking around the buildings are limited to government vehicles except an approximately ¼ block section in the southeast corner of the U.S. Custom House which has limited parking for bicycles and motorbikes.

Figure 3 presents regional and localized VMT data per employee, capita, and job.



### **3.4.3. Environmental Consequences**

The proposed significance criteria is based on VMT levels that are 15 percent or more below regional averages.

#### **3.4.3.1 Proposed Action**

The Proposed Action would result in a temporary increase in traffic, transit, and parking demand for the duration of construction. Since both GSA buildings would remain in operation during construction, the incremental increase in transportation and parking demand would be in addition to those that occur under existing conditions. Construction-related activities would involve the delivery of construction materials and equipment, construction worker commuting, the removal of construction debris, and the removal of construction equipment after construction concludes. It is anticipated that delivery and removal activities would be periodic and would not recur regularly through the duration of construction. Construction worker travel would recur on a daily basis and is expected to coincide with peak commuting periods.

Delivery and removal activities would involve truck trips traveling to and from the staging area. Construction worker trips are more flexible with respect to mode of travel and may involve transit and/or passenger vehicles. To the extent that workers drive to the Proposed Action, their vehicles would contribute toward traffic congestion and would increase parking demand. If workers use transit, there would be no net increase in vehicular traffic or parking demand. Although no specific data is available about construction worker travel modes, the relatively low VMT for the area encompassing the Proposed Action suggests that commuting in this area is well served by public transit.

As described in the Technical Advisory on Evaluating Transportation Impacts in CEQA (California Office of Planning and Research 2018), VMT levels that are 15 percent or more below regional averages suggest a less than significant impact to transportation under CEQA. As shown in Figure 3, projected 2040 VMT per capita, VMT per employee, and VMT per job are all substantially below the threshold in the Technical Advisory.

These results suggest that the transportation network provides sufficient travel mode choices (especially public transit) to accommodate local and regional travel to and from the Proposed Action without necessitating a large number of lengthy passenger vehicle trips.

The Proposed Action's impacts to transportation and parking would be limited to the duration of construction. Delivery and removal trips would be periodic and may be scheduled outside of the traditional peak commuting periods. While worker trips would recur during the peak commuting periods, some of these trips would likely involve local and regional transit services, thus limiting effects on traffic and parking. With the implementation of the avoidance, minimization, and/or mitigation measures described below, the impact to transportation and parking would be less than significant.

#### **3.4.3.2 No Action Alternative**

Under the No Action Alternative, there would be no change to existing conditions. Therefore, implementation of the No Action Alternative would not impact transportation and parking.

#### **3.4.4. Avoidance, Minimization and/or Mitigation Measures**

Although impacts to transportation and parking would be less than significant, the following measures would minimize potential impacts:

- Develop a transportation management plan to minimize the effects of recurring worker commuting trips on the street network and parking facilities. To the extent feasible, the plan should incentivize construction workers to use Muni and BART services for access.
- Process appropriate construction traffic control permits with the City of San Francisco to minimize any construction impacts to traffic and transit services.

### **3.5 Solid and Hazardous Wastes/Materials**

Hazardous wastes are defined by the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments, as: “a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may (A) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (B) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed.” Certain types of hazardous wastes are subject to special management provisions intended to ease the management burden and facilitate the recycling of such materials. These are called universal wastes and their associated regulatory requirements are specified in 40 CFR part 273. Four types of waste are currently covered under the universal wastes regulations: hazardous waste batteries, hazardous waste pesticides that are either recalled or collected in waste pesticide collection programs, hazardous waste thermostats, and hazardous waste lamps, such as fluorescent light bulbs.

Special hazards are those substances that might pose a risk to human health and are addressed separately from other hazardous substances. Special hazards include asbestos-containing material (ACM), polychlorinated biphenyls (PCBs), and lead-based paint (LBP). USEPA is given authority to regulate special hazard substances by the Toxic Substances Control Act (TSCA). Asbestos is also regulated by USEPA under the CAA, and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

#### **3.5.1 Regulatory Setting**

The primary federal laws regulating hazardous waste/materials are RCRA and CERCLA. The purpose of CERCLA, often referred to as Superfund, is to clean up contaminated sites so that public health and welfare are not compromised. RCRA provides for “cradle to grave” regulation of hazardous waste. Other federal laws include:

- Community Environmental Response Facilitation Act (CERFA) of 1992
- Clean Air Act
- Safe Drinking Water Act
- Occupational Safety & Health Act (OSH Act)
- Atomic Energy Act
- Toxic Substances Control Act (TSCA)
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

In addition to the acts listed above, Executive Order 12088, *Federal Compliance with Pollution Control*, mandates that necessary actions be taken to prevent and control environmental pollution when federal activities or federal facilities are involved.

Worker health and safety and public safety are key issues when dealing with hazardous materials that may affect human health and the environment. Proper disposal of hazardous materials is vital if such materials are encountered during project construction.

### **3.5.2 Affected Environment**

The Proposed Action involves limited scope repairs and alterations and does not involve a site acquisition, new construction, lease construction, construction of additions, or real property disposal. As such and in accordance with GSA's NEPA guidance, a Phase I environmental site assessment was not conducted (GSA 1999).

A search was conducted of the State of California Department of Toxic Substances Control EnviroStor online database. EnviroStor is an online database search and geographic information system (GIS) tool for identifying sites that have known contamination or sites where there may be reasons to investigate further. It also identifies facilities that are authorized to treat, store, dispose or transfer hazardous waste. A search on EnviroStor reflects that the Appraisers Building and U.S. Custom House are not listed in the database and sites of environmental investigation are not within distances that would be affected by the limited repairs of the Proposed Action (EnviroStor 2019).

A search was also conducted of the State of California Regional Water Quality Control Board GeoTracker online database. GeoTracker is a database and GIS that provides online access to environmental data. It tracks regulatory data about leaking underground storage tanks, Department of Defense, Spills-Leaks-Investigations-Cleanups, and landfill sites. A search of the Proposed Action sites indicates that an 8,000-gallon underground storage tank is located at the Appraisers Building, 630 Sansome Street and that a closure report and no further action letter was completed in 2006 (CA State Water Resources Control Board 2019). Due to the limited scope repairs and alterations and the local hazardous site information, no significant hazards to the public or the environment related to known contaminations are anticipated to occur.

No other areas of concern or active cases are identified within 0.25-mile of the Proposed Action site in the GeoTracker or EnviroStor databases; as such, no significant hazards to the public or the environment related to known contaminations are anticipated to occur.

A search of USEPA Cleanup sites online indicates that there is a U.S. Custom Service Lab in the Appraisers Building but it does not qualify for the National Priorities List (NPL) of sites of national priority among known releases or threatened releases of hazardous substances, pollutants, or contaminants based on existing information (USEPA 2019).

### **3.5.3 Environmental Consequences**

The proposed significance criteria for solid and hazardous wastes/materials are as follows: Using HMs that are highly toxic or have a potential to cause severe environmental damage (e.g., extremely hazardous substances as listed in SARA Title III); or generating HW types or quantities or solid waste quantities that could not be accommodated by the current management systems; or disturbing a

contamination site that would pose a potential for environmental or health impacts or result in new/additional remediation measures.

### **3.5.3.1. Proposed Action**

Construction of the Proposed Action may require the use of hazardous materials (e.g., fuels, lubricants, solvents, elevator hydraulic fluid that may contain polychlorinated biphenyls, etc.), which would require proper storage, handling, use and disposal; however, no routine transport, use, or disposal of hazardous materials would occur. The construction contractor would implement a Hazardous Materials and Wastes Management Plan to ensure appropriate procedures are in place to address handling, storage, and disposal of hazardous materials and wastes during construction. The Proposed Action would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

An asbestos survey was conducted at the Appraisers Building in 2002 to identify potential ACM. Samples were taken at various locations throughout the building such as acoustical tiles, ceiling tiles and plaster, pipe fitting insulation on various systems, transite panels, etc. The majority of areas sampled were identified as being in good condition and were not considered to pose a threat. The ACMs are managed in place in accordance with current regulations. The report noted that prior to renovation or demolition to identified areas, those materials should be abated. The Proposed Action may encounter ACM at the Appraisers Building. While an asbestos survey is not available for the U.S. Custom House, the repair contractor will assume that appropriate areas may contain ACM.

A lead survey was performed in the U.S. Custom House in March 2005 (as referenced in the GSA Lead Operations and Maintenance Plan) and identified some areas containing LBP. As a result, a Lead Operations & Maintenance Plan was developed to control LBP and lead-containing materials located at the building. The Operations and Maintenance Plan provides procedures and guidelines that, when used during facility cleaning, maintenance, renovation, and general operations, will minimize exposure to airborne lead and minimize the release of lead into the environment.

Non-hazardous solid waste would be generated during construction of the Proposed Action, creating a negligible, short-term, impact. Minimization of solid waste disposal would be achieved through construction and demolition debris recycling. The construction contractor would divert recyclable material from the municipal solid waste facilities to the maximum extent practical. Following construction, no solid waste would be generated in association with the Proposed Action, as no new waste-generating uses are proposed.

Therefore, implementation of the Proposed Action would result in no significant impact from solid and hazardous wastes/materials.

### **3.5.3.2 No Action Alternative**

Under the No Action Alternative, the proposed limited scope repairs and alterations would not be implemented, the existing buildings would remain in their current condition, and no temporary construction activities would occur. Consequently, no associated impacts would occur. There would be no adverse impacts related to environmental solid and hazardous wastes/materials.

### 3.5.4 Avoidance, Minimization, and/or Mitigation Measures

Although impacts related to solid and hazardous wastes/materials would be less than significant, the following provide further measures to minimize potential impacts:

- The construction contractor would implement a Hazardous Materials and Wastes Management Plan to ensure appropriate procedures are in place to address handling, storage, and disposal of hazardous materials and wastes during construction.
- The Proposed Action construction contractor shall hire a qualified independent contractor to remove and dispose any asbestos containing material and LBP in the appropriate repair areas of the Appraisers Building and the U.S. Custom House. The same firm shall perform environmental monitoring during the abatement work in accordance with the USEPA, and other applicable environmental regulations. All waste disposal manifests shall be turned over to GSA upon completion of the repairs.

### 3.6 Biological Resources

Biological resources include living, native, or naturalized plant and animal species and the habitats within which they occur. Plant associations are referred to generally as vegetation, and animal species are referred to generally as wildlife. Habitat can be defined as the resources and conditions present in an area that support a plant or animal.

#### 3.6.1 Regulatory Setting

The Proposed Action is subject to federal and state laws to prevent significant impacts to biological resources. These laws include but are not limited to the Endangered Species Act (ESA); the Fish and Wildlife Coordination Act; the Bald and Golden Eagle Protection Act (BGEPA); and the Migratory Bird Treaty Act (MBTA). Birds, both migratory and most native-resident bird species, are protected under the MBTA, and their conservation by federal agencies is mandated by Executive Order 13186, *Responsibilities of Federal Agencies to Protect Migratory Birds*. Under the MBTA it is unlawful by any means or in any manner, to pursue, hunt, take, capture, kill, attempt to take, capture, or kill, [or] possess migratory birds or their nests or eggs at any time, unless permitted by regulation.

#### 3.6.2 Affected Environment

The Proposed Action is developed and surrounded by urban development. The area surrounding the Proposed Action does not contain native habitat that would support any federally listed endangered species. There are street trees and other ornamental landscaping that could provide habitat for migratory birds protected under the MBTA. On occasion, peregrine falcon (*falco peregrinus*) individuals have been known to use ledges on tall buildings as perches when hunting urban pigeons (*columba livia domestica*), a known food source for this species. On rarer occasions, they will use these ledges for nesting. The peregrine falcon has been delisted from the ESA and the California Fish and Game Code but is protected under the MBTA managed by the U.S. Fish and Wildlife Service (USFWS).

#### 3.6.3 Environmental Consequences

The proposed significance criteria for biological resources include the following: the permanent loss or degradation of designated rare/sensitive plant species or introduction or increased prevalence of undesirable non-native species; Long-term loss or impairment of a substantial portion of local habitat



(species dependent); Significant decline in Migratory Bird Treaty Act population or direct mortality or take; Direct mortality or other unpermitted take of threatened & endangered species; Jeopardize the continued existence of a species or result in an overall decrease in population diversity, abundance, or fitness; or Degradation of habitat quality or diminish species health.

### **3.6.3.1 Proposed Action**

The Proposed Action would primarily include maintenance and repairs to the interior the buildings, and thus would have no impact on any state or federally protected species. Repairs to the exterior of the building would include items such as repairing windows, replacing the curtain wall, and repairing the roof. The only protected species with any likelihood of being encountered on the exterior walls or roof of the subject buildings would be birds including raptors such as the peregrine falcon. There have been no recorded observations of the falcon nesting or perching on either building. Avoidance and minimization measures have been provided in section 3.6.4 below, ensuring that peregrine falcon or other migratory bird species are not directly or indirectly impacted by construction of the Proposed Action. The Proposed Action is not anticipated to result in significant impacts to biological resources.

### **3.6.3.2 No Action Alternative**

Under the No Action Alternative, the proposed limited scope repairs and alterations would not be implemented, the existing buildings would remain in their current condition, and no temporary construction activities would occur. Consequently, no associated impacts would occur. There would be no adverse impacts related to biological resources.

### **3.6.4 Avoidance, Minimization and/or Mitigation Measures**

Although impacts to biological resources are anticipated to be less than significant, in the event a peregrine falcon or any other protected species is discovered nesting on any part of the subject buildings, the contractor should contact the building manager and the nest would be avoided. In compliance with the MBTA, should exterior work such as window replacement or roofing repairs be required within 500 feet (horizontal or vertical) of an active raptor or special-status species nest, or within 300 feet of any other protected species nest, the contractor shall cease work until the nest has been abandoned. Alternatively, the contractor should contact the USFWS San Francisco field office to establish a reduced buffer zone around the species to allow work to continue.

## **3.7 Safety and Occupational Health**

The discussion of health and safety includes consideration for any activities, occurrences, or operations that have the potential to affect the safety, well-being, or health of members of the public, or workers associated with the Proposed Action. A safe environment is one in which there is no, or optimally reduced, potential for death, serious bodily injury or illness, or property damage. The primary goal is to identify and prevent potential accidents or impacts on the public. Public health and safety within this EA discusses information pertaining to community emergency services, construction activities, operations, and environmental health and safety risks to children. Community emergency services are organizations which ensure public safety and health by addressing different emergencies. The three main emergency service functions include police, fire and rescue service, and emergency medical service (EMS).

Environmental health and safety risks to children are defined as those that are attributable to products or substances a child is likely to come into contact with or ingest, such as air, food, water, soil, and products that children use or to which they are exposed.

### **3.7.1. Regulatory Setting**

The Occupational Safety and Health Administration (OSHA) is a federal agency that was founded alongside the OSH Act of 1970. The OSH Act seeks to protect the rights of workers and to offer long-term solutions for regulating workplace hazards. Worker health and safety and public safety are key issues when dealing with construction projects that may affect human health and safety.

Pursuant to Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks*, federal agencies are directed, as appropriate and consistent with the agency's mission, to make it a high priority to identify and assess environmental health risks and safety risks that may disproportionately affect children.

### **3.7.2. Affected Environment**

As discussed above, the area surrounding the Proposed Action is a highly-urbanized area within Downtown San Francisco. The nearest school, Breakthrough Collaborative, a college preparatory school serving underprivileged communities, is located at 545 Sansome Street, approximately 100 feet from the Proposed Action area. In addition, more than one thousand residences and business addresses can be found within a two-block radius.

### **3.7.3. Environmental Consequences**

The proposed significance criteria for safety and occupational health is to prevent serious bodily injury or illness, or property damage. For public health and safety during construction and renovation activities is generally associated with construction traffic, as well as the safety of personnel within or adjacent to the construction zones.

#### **3.7.3.1. Proposed Action**

The age of the subject buildings suggests that there is a potential to encounter hazardous building materials such as LBP coatings and ACM in gaskets, pipe wraps, wiring insulation, roofing material, caulking/joint compound, or other materials. Thus, it is reasonable to assume workers may encounter materials of potential concern in the course of disassembly and demolition.

Federal, state, and local laws and regulations govern handling of building materials that have LBP. OSHA Lead Construction Standards establish a maximum safe exposure level for the following types of construction work where lead exposure may occur: demolition or salvage of structures where lead or materials containing lead are present, removal or encapsulation of materials containing lead, and new construction, alteration, repair, or renovation of structures or materials containing lead. Intact paint on metal may be sent to a salvage or recycling operation. Scrap metal may be sent to a recycler as long as the loose, flaking paint is first removed or stabilized.

Asbestos is regulated both as a hazardous air pollutant under CAA regulations and as a potential worker safety hazard under the authority of the California Department of Occupational Safety and Health Administration (Cal/OSHA). These regulations prohibit emissions of asbestos from asbestos-related manufacturing, demolition, or construction activities; require medical examinations and monitoring of

employees engaged in activities that could disturb buildings with ACM; specify precautions and safe work practices that must be followed to minimize the potential for release of asbestos fibers; and require notice to federal and local government agencies before beginning renovation or demolition that could disturb ACMs. The agencies with primary responsibility for asbestos safety are the BAAQMD, Cal/OSHA, OSHA, and USEPA. To ensure public and worker safety, a California Certified Asbestos Consultant and California Department of Public Health-certified lead inspector/assessor, project monitor, and project designer would conduct an inspection for asbestos and lead paint and would ensure OSHA required personal protective equipment (PPE) is worn to avoid worker contact (e.g., inhalation, injection, ingestion, etc.)

As noted above, the closest school to the Proposed Action site is located approximately 100 feet away. Areas with mid- to high-rise multi-family residences are similarly close to the site. At this distance, there is the potential for environmental health and safety risks to children from localized construction impacts, but analysis in other sections of the EA indicate that temporary noise and air quality emissions associated with construction would not be substantial at nearby sensitive receptors such as schools and residences.

Furthermore, the Proposed Action site would have limited repairs outside and would be fenced and under security during construction, so that the likelihood of children entering the site and encountering safety risks is low. No adverse impacts related to environmental health and safety risks to children are anticipated to occur. Moreover, no long-term sources of environmental health and safety risks would be associated with the Proposed Action. Therefore, implementation of Proposed Action would not result in significant impacts to Safety and Occupational Health.

### **3.7.3.2. No Action Alternative**

Under the No Action Alternative, the proposed limited scope repairs and alterations would not be implemented. The existing buildings would remain in their current condition of disrepair. Consequently, the buildings' systems will continue to deteriorate and could potentially pose unsafe conditions for staff and visitors unless they are repaired, modified or replaced. Therefore, the No Action Alternative could lead to adverse impacts related to environmental health and safety.

### **3.7.4. Avoidance, Minimization, and/or Mitigation Measures**

Although no substantial adverse impacts related to environmental health and safety risks to children are anticipated, a Health and Safety Plan will be developed to address construction/renovation related activities, handling, storing, and disposing of hazardous wastes/materials, as well as environmental (ACM/LBP) activities as discussed in section 3.5. Subcontractors hired for any part of the repairs and alterations will follow the Health and Safety Plan as well.

## **3.8 Irreversible and Irretrievable Commitment of Resources**

NEPA requires the identification of any irreversible and irretrievable commitment of resources that would be involved in the implementation of a proposed action. Irreversible and irretrievable resource commitments are related to the use of nonrenewable resources (e.g., fossil fuels) and the impacts that the uses of these resources could have on future generations. Irreversible impacts primarily result from the use or destruction of a specific resource (e.g., energy and minerals) that cannot be replaced within a reasonable timeframe. Irretrievable resource commitments involve the loss in value of an affected

resource that cannot be restored as a result of a proposed action (e.g., extinction of a threatened or endangered species, disturbance of a cultural site).

Limited repairs and renovations associated with the Proposed Action would require consumption of materials typically associated with exterior and interior construction (e.g., concrete, wiring, piping, insulation, windows). Recycled materials would be used to the extent practicable, and the amount of these materials used would not significantly decrease the availability of the resources. Small amounts of nonrenewable resources would be used; however, these amounts would not be appreciable and would not affect the availability of these resources. The Proposed Action would also require consumption of fuels including some that would be nonrenewable resources (e.g., petroleum-based fossil fuel products for vehicles) during the construction phases of the Proposed Action. The Proposed Action would not significantly decrease the availability of mineral or petroleum resources or the availability of such resources in the region or the nation.

### 3.9 Cumulative Impacts

This chapter 1) defines cumulative impacts, 2) defines the cumulative effects region, 3) describes past, present, and reasonably foreseeable future actions relevant to cumulative impacts, and 4) analyzes the incremental interaction the Proposed Action may have with other actions and the potential cumulative impacts resulting from these interactions.

The following approach to cumulative impact analysis follows the objectives of NEPA, CEQ regulations, and CEQ guidance. 40 CFR Section 1508.7 defines *cumulative impacts*.

#### 3.9.1 Definition of Cumulative Impacts

Cumulative effects are the combined impacts on the environment that result from the incremental effect of a proposed action when added to past, present, and reasonably foreseeable future actions within the immediate vicinity of the project area (40 CFR 1508.7). Cumulative impacts can result from individually minor, but collectively substantial impacts taking place over a period of time. Cumulative impacts on resources in a project area may result from the impacts of a proposed action together with other past, present, and reasonably foreseeable projects, such as residential, commercial, industrial, and other development. These land use activities may result in cumulative effects on a variety of natural resources, such as species and their habitats, water resources, and air quality. They also can contribute to cumulative impacts on the urban environment, such as changes in community character, traffic patterns, noise, housing availability, and employment.

The CEQ and USEPA have published guidance addressing implementation of cumulative impact analyses—*Guidance on the Consideration of Past Actions in Cumulative Effects Analysis* (CEQ 2005) and *Consideration of Cumulative Impacts in USEPA Review of NEPA Documents* (USEPA 1999). CEQ guidance entitled *Considering Cumulative Impacts Under NEPA* (1997) states that cumulative impact analyses should:

*“...determine the magnitude and significance of the environmental consequences of the proposed action in the context of the cumulative impacts of other past, present, and future actions...identify significant cumulative impacts...[and]...focus on truly meaningful impacts.”*

Cumulative impacts are most likely to arise when a relationship or synergism exists between a proposed action and other actions expected to occur in a similar location and/or during a similar time period.

Actions overlapping with or in close proximity to the proposed action have more potential for a relationship than those more geographically separated. Similarly, relatively concurrent actions would tend to offer a higher potential for cumulative impacts.

### **3.9.2 Cumulative Effects Region**

The scope of the cumulative impacts analysis involves both the geographic extent of the effects and the time frame in which the effects could occur. For this EA, the study area delimits the geographic extent of the cumulative impacts analysis. For cultural resources, the area corresponds to the downtown area. For air quality, the cumulative study area is the San Francisco Bay Air Basin. For noise, the cumulative study area is limited to the areas immediately adjacent to the proposed site, because noise attenuates with distance and only has the potential to combine with other noise sources in the immediate vicinity. The cumulative traffic study area includes roadway segments and intersections that are likely to be affected by the Proposed Action.

The time frame for cumulative impacts centers on the anticipated timing of the Proposed Action and extends from January 2018 to December 2023.

### **3.9.3 Past Approximately, Present, and Reasonably Foreseeable Actions**

The Proposed Action is located in the Financial District of Downtown San Francisco, a densely developed, highly active, major metropolitan area. For the purposes of comparison to the Proposed Action, a search of the City and County of San Francisco Planning website was conducted to find recent permit applications (including internal and external building permit applications and street space permit applications). More than 800 permits within a two-block radius of the subject property were applied for or approved between 2018 and present (Appendix B – Cumulative Projects). As shown in the project list in Appendix B, the majority of the projects are building alterations or repairs (similar to the Proposed Action). The projects represent a mix of reasonably foreseeable public and private development projects within the cumulative effects region and are for actions beginning in January 2018 and extending for several years.

### **3.9.4 Cumulative Impact Analysis**

#### **3.9.4.1 Cultural and Historic Resources**

Implementation of the Proposed Action would be in accordance with the outcome of the on-going Section 106 consultation with the SHPO. The GSA would implement all required measures to reduce the potentially adverse impacts of the Proposed Action on the historic buildings and retain their historic characteristics. Given the history and cultural significance of the cumulative effects region, many of the identified cumulative projects are anticipated to have the potential to affect historic resources and as such, would be required to comply with Section 106 of the NHPA. If cumulative projects are within or near historically significant buildings or archaeological resources, constructing such projects may damage or alter those resources so that they no longer convey significance. However, each project would undergo project-specific Section 106 consultation, as appropriate. The Section 106 process outcome for each project is anticipated to minimize potential effects to historic resources. Therefore, implementation of the Proposed Action when combined with past, present, and reasonably foreseeable future projects, would not result in a significant adverse effect to cultural resources.

### **3.9.4.2 Air Quality and Greenhouse Gas Emissions**

As presented in section 3.2 and Table 3.4, implementation of the Proposed Action would produce short-term construction emissions that would be below applicable *de minimis* levels. While the Proposed Action would contribute to GHG emissions, as shown in Table 3.5, the proposed GHG emissions would not, either individually or cumulatively, result in considerable, significant GHG emissions to the environment. Implementation of the identified cumulative projects would result in short-term construction emissions and a long-term increase in vehicle-related and GHG emissions associated with the anticipated increase in downtown workers and residents resulting from some of the identified cumulative projects. Through active planning documents such as the “Spare the Air Cool the Climate”, the BAAQMD and stakeholders have developed and are implementing a blueprint for clean air and climate protection in the Bay Area (BAAQMD 2017). Thus, as presented in their 2017 report, even with the implementation of the Proposed Action and cumulative projects, the BAAQMD is anticipated to continue to progress in improving air quality throughout the San Francisco Bay Area (BAAQMD 2017). Therefore, implementation of the Proposed Action in conjunction with the cumulative projects would result in less than significant short-term, intermittent increases in emissions within the region during construction activities.

### **3.9.4.3 Noise and Vibration**

Implementation of the Proposed Action would generate temporary and intermittent construction-related noise that would generally be audible in the immediate vicinity of the construction activities (within one block). However, due to the urban (and associated overall noisy) nature of the Proposed Action site and surroundings, noise from construction activity would be masked by the general noise environment with increasing distance from the project area. The identified cumulative projects would also generate construction- and vehicle-related noise; noise levels that would also be characteristic of a vibrant downtown environment. The Proposed Action and identified cumulative projects would comply with City of San Francisco noise policies and standards. Standard construction BMPs would be implemented to further reduce noise and vibration effects during construction. Therefore, implementation of the Proposed Action when combined with past, present, and reasonably foreseeable future projects, would not result in significant cumulative impacts to the noise environment.

### **3.9.4.4 Transportation and Parking**

Implementation of the Proposed Action would result in a temporary increase in traffic, transit, and parking demand for the duration of construction. The contribution of the Proposed Action to transportation impacts would be negligible when considered in the context of the overall existing and future downtown transportation levels because the Proposed Action is of limited scope and the majority of the Proposed Action would be limited to federal property. The identified cumulative projects are anticipated to contribute to transportation impacts to include increased traffic volumes, increased congestion on some downtown roadways, and temporary impacts to parking (i.e., loss of parking spaces). Potential impacts associated with temporary detours or diversion of traffic would be minimized through implementation of a transportation management plan, which would provide additional measures to reduce construction-related traffic impacts. To the extent that construction periods overlap, there is a potential for cumulative traffic impacts from multiple project detours and lane reductions occurring simultaneously, potentially resulting in deterioration of traffic operations on study area roadways.

The potential for cumulative traffic impacts would be minimized through planning and design in coordination with the City of San Francisco. Furthermore, the Proposed Action and cumulative projects (with a transportation element) would obtain and implement appropriate construction traffic control permits with the City of San Francisco to schedule and minimize construction impacts to traffic and transit services. Therefore, implementation of the Proposed Action when combined with past, present, and reasonably foreseeable future projects, would not result in significant cumulative impacts to transportation.

#### **3.9.4.5 Solid and Hazardous Wastes/Materials**

Implementation of the Proposed Action would not result in significant impact from solid and hazardous wastes or materials. When combined with other construction projects identified in the Proposed Action area there is a potential increase of risk of solid and hazardous waste or materials being handled improperly or illegally; however, each project would be required to comply with the applicable regulations or face potential criminal liability. Since the projects identified within the Proposed Action area are associated with building permits applied through the City of San Francisco, it is assumed that permits will be issued only after the construction has been inspected throughout the construction process. This regulatory oversight of the building process would ensure compliance with applicable local, state and federal regulations. Therefore, implementation of the Proposed Action when combined with past, present, and reasonably foreseeable future projects, is not likely to result in significant cumulative impacts from solids and hazardous waste or materials.

#### **3.9.4.6 Biological Resources**

Implementation of the Proposed Action is not likely to result in an adverse effect to peregrine falcons or other protected bird species with implementation of the MBTA. When combined with other construction projects identified in the Proposed Action area there is a potential increase of risk of an adverse impact to migratory birds or other protected biological resources; however, all projects identified within the Proposed Action area are located in a highly developed, urban setting, with virtually no remaining native habitat. Therefore, implementation of the Proposed Action when combined with past, present, and reasonably foreseeable future projects, would not result in significant cumulative impacts to biological resources.

#### **3.9.4.7 Safety and Occupational Health**

Implementation of the Proposed Action is not anticipated to result in adverse impacts related to environmental health and safety risks. When combined with other construction projects identified in the Proposed Action area there is a potential increase of risk to health and safety. Since the projects identified within the region of influence are associated with building permits applied through the City of San Francisco, it is assumed that permits will be issued only after the construction has been inspected throughout the construction process. It is anticipated each of these projects would comply with City of San Francisco building codes as well as OSHA standards to reduce such risks. Therefore, implementation of the Proposed Action when combined with past, present, and reasonably foreseeable future projects, would not result in significant cumulative impacts to safety and occupational health.

### **3.9.5 Avoidance, Minimization, and/or Mitigation Measures**

Because no substantial adverse cumulative impacts would result from implementation of the Proposed Action in conjunction with the identified cumulative projects, no avoidance, minimization, or mitigation measures are proposed beyond those presented in Table 2.2. The measures in Table 2.2 would be implemented as part of the Proposed Action to further reduce potential impacts to cultural and historic resources, air quality and greenhouse gas emissions, noise and vibration, transportation and parking, solid and hazardous wastes/materials, biological resources, safety and occupational health from implementation of the Proposed Action.



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## 4. PUBLIC INVOLVEMENT AND COORDINATION

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This chapter summarizes the results of GSA's effort to coordinate with public agencies and community stakeholders as part of the NEPA process.

### 4.1 Public Scoping Process

GSA published a NOI to prepare an EA in the Federal Register on July 31, 2019. The NOI invited agencies and the public to submit comments regarding the scope of the EA. The comment period on the NOI ended on August 31, 2019. A public scoping meeting was held on August 8, 2019, at the Chinatown Branch Library, 1135 Powell St., within walking distance of the Proposed Action (.5 miles). Postcards were mailed to over 500 residences and businesses within a 2-block radius of the Proposed Action, including regulatory agencies and local city officials (see Appendix D - Distribution List). There were six government and contractor representatives available to the public at the public scoping meeting. Three people from the public attended the meeting, none of whom provided written comments.

During the public scoping period, the USEPA, Region 9 acknowledged receipt via e-mail of the notification that an EA will be prepared and they had no comments at that time. No additional written comments were received.

### 4.2 Consultation and Coordination with Public Agencies

Communication with various agencies was initiated in 2019 and included notification regarding the public scoping meeting held on August 8, 2019. Agencies included, in part, the California Office of Historic Preservation; Historical Resources Commission; San Francisco Museum and Historical Society; San Francisco Architectural Heritage; Landmarks Preservation Board Buildings and Grounds; California Native American Heritage Commission; California Department of Fish and Wildlife; U.S. Fish and Wildlife Service; Bay Area Air Quality Management District; USEPA, Region 9; San Francisco Department of Public Health – Environmental Health; San Francisco Board of Supervisors; Office of the Mayor - City of San Francisco; Bureau of Architecture; and Numerous San Francisco Departments (Fire Department, Department of Building Inspection, Public Works, Division of Engineering Services, Planning Commission, Planning Department-Transportation, Police Department).

### 4.3 Public Participation

In addition to the public scoping process and publishing the NOI in the Federal Register the GSA, GSA also provides information on the Proposed Action on their website for the Appraisers Building at <https://www.gsa.gov/about-us/regions/welcome-to-the-pacific-rim-region-9/buildings-and-facilities/california/us-appraisers-building> and for the U.S. Custom House at <https://www.gsa.gov/about-us/regions/welcome-to-the-pacific-rim-region-9/buildings-and-facilities/california/us-custom-house-san-francisco> (the Draft EA is located under the "Current Projects" section).

GSA will continue to work with the community, stakeholders, and local agencies to ensure they remain involved and informed throughout the environmental review process.

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## 5. LIST OF PREPARERS

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This EA was prepared under the direction of GSA by the Adanta and Scout Environmental team. Members of the professional staff include:

### GSA

Osmahn Kadri, GSA Regional Environmental Quality Advisor/NEPA Project Manager, Portfolio Management Division

Tony Liu, GSA Asset Manager

Jaime Stephan, Building Manager, GSA Public Building Service, Pacific Rim, Region 9

Jane Lehman, GSA Regional Historic Preservation Officer

### Adanta

Terry Powers, Project Director and GIS lead

Joe Schwennessen, Resource Area Analyst

Phil Rosenberg, Resource Area Analyst

### Scout Environmental, Inc.

Melanie Hernandez, JD, CEP, NEPA Project Manager

Ryan Pingree, AICP, CEP, Deputy NEPA Project Manager

Jim Campe, Resource Area Analyst

Julie Werner, PE, Air Quality

Scott Barker, PE, AICP, Transportation and Parking

Roxanne Beasley, Technical Editor

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## APPENDIX A

## PUBLIC NOTICE AND CONSULTATION

The following Notice of Intent (NOI) was published in the Federal Register on July 30, 2019 and the subsequent page reflects the NOI that was published in the San Francisco Chronicle on July 30 and August 4, 2019. No written public comments were received.

 <b>36926</b>	<b>Federal Register</b> / Vol. 84, No. 146 / Tuesday, July 30, 2019 / Notices	
<p>acid formula, trade secrets, including know-how for its AHRO; (2) customer contracts for North America; (3) key Houghton employees that are responsible for the commercial and technical aspects of the AHRO business; and (4) adjacent products including fire resistant hydraulic fluids.</p> <p>To remedy harm in the market for SCRO, which includes sheet cold rolling oil, TPRO, and pickle oil. Quaker will divest to Total: (1) Houghton's formulations, trade secrets and intellectual property, including know-how for sheet cold rolling oils, TPRO, and pickle oil; (2) customer contracts for North America; (3) key Houghton employees that are responsible for the commercial and technical aspects of the SCRO business; and (4) SCRO and TPRO cleaners.</p> <p>By direction of the Commission. <b>April J. Tabor,</b> <i>Acting Secretary.</i> [FR Doc. 2019-16152 Filed 7-29-19; 8:45 am] BILLING CODE 6750-01-P</p>	<p>Environmental Quality Advisor/NEPA Project Manager, General Services Administration, Pacific Rim Region, at 415-522-3617 or email <a href="mailto:osmahn.kadri@gsa.gov">osmahn.kadri@gsa.gov</a>.</p> <p><b>SUPPLEMENTARY INFORMATION:</b></p> <p><b>Background</b></p> <p>GSA intends to prepare an EA to analyze the potential impacts resulting from proposed renovations associated with the Appraisers Building and U.S. Customs House Renovations Project.</p> <p>The Project is located at 630 Sansome Street (Appraisers Building) and 555 Battery Street (U.S. Customs House), San Francisco, California. The Project is proposed in order to bring these buildings up to current building code, safety standards and serviceable condition and to prolong their useful life.</p> <p>The Appraisers Building is a Class-B office building on a .86-acre site in the central business district of San Francisco. The original structure was constructed in 1944, and is nineteen stories above-ground, which includes the penthouse, loft, two levels of mechanical space, and three tiered-roof levels. This building is adjacent to the U.S. Customs House.</p> <p>The U.S. Customs House is on a .86-acre site located on the northern edge of the city's financial district, occupying one-half of the block bounded by Sansome, Jackson, Battery and Washington Streets. The Class B structure was constructed in 1911 and is composed of two interconnected structures.</p> <p><b>Alternatives Under Consideration</b></p> <p>The EA will consider one Action Alternative (the Proposed Action) and the No Action Alternative. The Action Alternative would consist of modernization work to repair, modify or replace certain building improvements and systems. The buildings would not be expanded in size and there would be no change in personnel staffing levels at each building. Construction is likely to impact parking access and traffic flow during construction.</p> <p>Under the No Action Alternative, modernization enhancements to the existing buildings would not occur.</p> <p><b>Scoping Process</b></p> <p>Scoping will be accomplished through public notifications in the <i>San Francisco Chronicle</i>, social media announcements, and direct mail correspondence to appropriate federal, state, and local agencies; surrounding property owners; and private organizations and citizens who have</p>	<p>previously expressed or are known to have an interest in the Project.</p> <p>The primary purpose of the scoping process is for the public to assist GSA in determining the scope and content of the environmental analysis.</p> <p>Dated: July 24, 2019. <b>Jared Bradley,</b> <i>Director, Portfolio Management Division, Pacific Rim Region, Public Buildings Service.</i> [FR Doc. 2019-16133 Filed 7-29-19; 8:45 am] BILLING CODE 6820-YF-P</p>
<p><b>GENERAL SERVICES ADMINISTRATION</b> [Notice-PBS-2019-08; Docket No. 2019-0002; Sequence No. 20]</p> <p><b>Notice of Intent To Prepare an Environmental Assessment for the Appraisers Building and U.S. Customs House, San Francisco, CA</b></p> <p><b>AGENCY:</b> Public Buildings Service (PBS), General Services Administration (GSA). <b>ACTION:</b> Notice.</p> <p><b>SUMMARY:</b> Pursuant to the requirements of the National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality Regulations, and the GSA PBS NEPA Desk Guide, GSA is issuing this notice to advise the public that an Environmental Assessment (EA) will be prepared for the Appraisers Building and U.S. Customs House Modernization Project, San Francisco, CA (Project).</p> <p><b>DATES:</b> Agencies and the public are encouraged to provide written comments regarding the scope of the EA. Comments must be received by August 26, 2019.</p> <p><b>ADDRESSES:</b> Please submit written comments by either of the following methods:</p> <ul style="list-style-type: none"><li>• <i>Email:</i> <a href="mailto:osmahn.kadri@gsa.gov">osmahn.kadri@gsa.gov</a>.</li><li>• <i>Postal Mail/Commercial Delivery:</i> ATTN: Mr. Osmahn Kadri, 50 United Nations Plaza, Room 3345, Mailbox 9, San Francisco, CA 94102.</li></ul> <p><b>FOR FURTHER INFORMATION CONTACT:</b> Mr. Osmahn A. Kadri, Regional</p>	<p><b>DEPARTMENT OF DEFENSE</b></p> <p><b>GENERAL SERVICES ADMINISTRATION</b></p> <p><b>NATIONAL AERONAUTICS AND SPACE ADMINISTRATION</b> [OMB Control No. 9000-0083; Docket No. 2019-0003; Sequence No. 3]</p> <p><b>Submission for OMB Review; Qualification Requirements</b></p> <p><b>AGENCY:</b> Department of Defense (DOD), General Services Administration (GSA), and National Aeronautics and Space Administration (NASA). <b>ACTION:</b> Notice.</p> <p><b>SUMMARY:</b> Under the provisions of the Paperwork Reduction Act, the Regulatory Secretariat Division will be submitting to the Office of Management and Budget (OMB) a request to review and approve a revision and renewal of a previously approved information collection requirement concerning qualification requirements.</p> <p><b>DATES:</b> Submit comments on or before August 29, 2019.</p> <p><b>ADDRESSES:</b> Submit comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Office of Information and Regulatory Affairs of OMB, Attention: Desk Officer for GSA, Room 10236, NEOB, Washington, DC 20503. Additionally submit a copy to GSA by any of the following methods:</p> <ul style="list-style-type: none"><li>• <i>Federal eRulemaking Portal:</i> This website provides the ability to type short comments directly into the comment field or attach a file for lengthier comments. Go to <a href="http://www.regulations.gov">http://www.regulations.gov</a> and follow the instructions on the site.</li><li>• <i>Mail:</i> General Services Administration, Regulatory Secretariat Division (MVCB), 1800 F Street NW, Washington, DC 20405. ATTN: Ms. Mandell/IC 9000-0083, Qualification Requirements.</li></ul> <p><i>Instructions:</i> All items submitted must cite Information Collection 9000-</p>	

**NOTICE OF INTENT TO PREPARE AN ENVIRONMENTAL ASSESSMENT FOR THE  
GENERAL SERVICES ADMINISTRATION (GSA) APPRAISERS BUILDING AND U.S.  
CUSTOM HOUSE MODERNIZATION PROJECT, SAN FRANCISCO, CA**

Pursuant to the requirements of the National Environmental Policy Act (NEPA) of 1969, the Council on Environmental Quality Regulations, and the GSA Public Building Service (PBS) NEPA Desk Guide, GSA is issuing this notice to advise the public that an Environmental Assessment (EA) will be prepared for the Appraisers Building and U.S. Custom House Modernization Project, San Francisco, CA. The EA will analyze the potential environmental impacts resulting from proposed renovations associated with the Appraisers Building (630 Sansome Street) and U.S. Custom House (555 Battery Street). The proposed action would consist of modernization work to repair, modify or replace certain building improvements and systems. The proposed action is necessary to bring these buildings up to current building code, safety standards, and serviceable condition, as well as to prolong their useful life.

Agencies and the public are encouraged to provide written comments regarding the scope of the EA. Comments must be received by August 31, 2019.

Please submit written comments by either of the following methods: Email: [osmahn.kadri@gsa.gov](mailto:osmahn.kadri@gsa.gov) or Postal Mail: ATTN: Mr. Osmahn Kadri, 50 United Nations Plaza, Room 3345, Mailbox 9, San Francisco, CA, 94102.

GSA will also be accepting comments on the proposed action at a public meeting to be held at the Chinatown Library, 1135 Powell Street, San Francisco, CA 94108, on August 8, 2019 between 4:00-7:00pm.

## APPENDIX B CUMULATIVE PROJECTS

The following is a list of building permits within a two-block radius of the Proposed Action.

\*=involves street space permits.

Location (San Francisco)	# Bldg Permits from Jan. 2018 to Present	Range of Activities
10 Nottingham PL	1	Building - Miscellaneous Street Space*
459 Broadway	1	Internal building alterations, additions or repairs
443 Broadway	1	Building - Miscellaneous Street Space*
407 Broadway	2	Internal building alterations, additions or repairs
534 Pacific Av	1	Building - OTC Alterations Permit Reroof
381 Broadway	1	Internal building alterations, additions or repairs
909 Montgomery	14	Internal building alterations additions or repairs
371 Broadway	3	2 Street Space, 1 Internal*
99 Osgood Pl	1	Internal building alterations, additions or repairs
930 Montgomery St	1	Internal building alterations, additions or repairs
41 Osgood Pl	1	Internal building alterations, additions or repairs
920 Montgomery St	3	1 Street Space, Internal*
450 Pacific Avenue	1	Internal building alterations, additions or repairs
50 Osgood Pl	1	Internal building alterations, additions or repairs
400 Pacific Av	3	2 Street Space, 1 Internal*
255 Broadway	7	Internal building alterations, additions or repairs
832 Sansome St	1	Internal building alterations, additions or repairs
838 Sansome St	1	Internal building alterations, additions or repairs
394 Pacific Av	8	Internal building alterations, additions or repairs
735 Battery	1	Internal building alterations, additions or repairs
717 Battery St	5	Internal building alterations, additions or repairs
750 Battery St	4	Internal building alterations, additions or repairs
747 Front Street	1	Internal building alterations, additions or repairs
288 Pacific Ave	5	1 Street Space, 4 Internal*
712 Battery St	3	1 Street Space, 2 Internal*
288 Pacific Ave	6	Internal building alterations, additions or repairs
733 Front St	5	Internal building alterations, additions or repairs
75 Broadway	15	5 Street Space, 10 Internal*
170 Columbus Av	16	Internal building alterations, additions or repairs
535 Pacific Av	1	Internal building alterations, additions or repairs
916 Kearny St	3	Internal building alterations, additions or repairs
900 Kearny St	14	2 Street Space, 12 Internal*

<b>Location (San Francisco)</b>	<b># Bldg Permits from Jan. 2018 to Present</b>	<b>Range of Activities</b>
809 Montgomery St	7	3 Street Space, 4 Internal*
801 Montgomery St	4	1 Street Space, 3 Internal*
850 Montgomery St	2	1 Street Space, 1 Internal*
477 Pacific Ave	1	Internal building alterations, additions or repairs
435 Pacific Ave	1	Internal building alterations, additions or repairs
755 Sansome St	13	Internal building alterations, additions or repairs
56 Gold St	1	Internal building alterations, additions or repairs
731 Sansome St	3	Internal building alterations, additions or repairs
478 Jackson St	4	Internal building alterations, additions or repairs
468 Jackson St	7	Internal building alterations, additions or repairs
468 Jackson St	10	8 Internal, 2 External awnings and store front door replacement
432 Jackson St	3	Internal building alterations, additions or repairs
414 Jackson St	1	Internal building alterations, additions or repairs
408 & 406 Jackson St	2	Internal building alterations, additions or repairs
402 Jackson St	2	1 Internal, 1 External removal of roll down gate
350 Jackson St	2	1 Street Space, 1 Internal*
633 Battery St	4	1 Street Space, 3 Internal*
600 Battery St	2	Internal building alterations, additions or repairs
220 & 244 Jackson St	7	1 Street Space, 6 Internal*
200 Jackson St	4	1 Street Space, 3 Internal*
848-838 Kearny St	8	1 Street Space, 7 Internal*
55 Columbus Av	1	1 Street Space, 7 Internal*
501, 503, 505, 513, 509 Jackson St	3	Internal building alterations, additions or repairs
499 Jackson St	1	Internal building alterations, additions or repairs
730 Montgomery St.	7	Internal building alterations, additions or repairs
710 Montgomery St	2	1 Street Space, 1 Internal*
584 Washington St 25 Hotaling Place	3	1 Street Space Washington, 2 Internal Hotaling PL*
415 Jackson St	2	Internal building alterations, additions or repairs
619 Sansome St	3	1 Street Space, 2 Internal*
528,550 Washington St	13	1 Street Space, 12 Internal*
500 Washington St	6	1 Street Space, 5 Internal*
550 Battery St	6	Internal building alterations, additions or repairs
405 Davis Ct	22	5 Street Space, 17 Internal*
750 Kearny St	10	1 Sidewalk Improvement, 9 Internal



Location (San Francisco)	# Bldg Permits from Jan. 2018 to Present	Range of Activities
611 & 655 Montgomery St	36	Internal building alterations, additions or repairs
700 & 710 Kearny St	2	Street Space*
660 & 680 Clay St	2	Street Space*
680 Clay St	4	Internal building alterations, additions or repairs
706 Kearny St	1	Internal building alterations, additions or repairs
708 Kearny St	2	Internal building alterations, additions or repairs
704 Kearny St	1	Awnings
700, 704, 706, 708, 710 Kearny St - 678, 680 Clay St	1	Removal of Signs and Awnings for painting
659 Merchant St	1	Internal building alterations additions or repairs
660, 662, 668, 670 Clay St	1	Removal of Signs and Awnings for painting
670 Clay St	1	Internal building alterations, additions or repairs
668 Clay St	2	Complaint
660 & 670 Clay St	1	Internal building alterations, additions or repairs
640 Clay St	3	Internal building alterations, additions or repairs
601 Montgomery St	10	Internal building alterations, additions or repairs
600 Montgomery St	46	7 Street Space, 39 Internal*
545 Sansome St	1	Internal building alterations, additions or repairs
505 Sansome St	31	Internal building alterations, additions or repairs
423 Washington	3	2 Street Space, 1 Internal*
500 Sansome St	4	Internal building alterations, additions or repairs
424 Clay St	5	Internal building alterations, additions or repairs
444 Battery St	3	Internal building alterations, additions or repairs
1 Maritime PZ , 300 Clay St CA	131	7 Street Space, 124 Internal*
250 Clay St	3	1 Street Space, 2 Internal*
689 Clay St	1	Reroofing
688 Clay St	1	Internal building alterations, additions or repairs
657 Clay St	2	Internal building alterations, additions or repairs
655 Commercial St	1	Internal building alterations, additions or repairs
555 Montgomery St	19	Internal building alterations, additions or repairs
626 Kearny St	1	Internal building alterations, additions or repairs
683 Commercial St	4	Internal building alterations, additions or repairs
660 Sacramento St	1	Internal building alterations, additions or repairs
653 Commercial St	3	Internal building alterations, additions or repairs
637 & 640 Sacramento St	8	2 Street Space, 6 Internal*

Location (San Francisco)	# Bldg Permits from Jan. 2018 to Present	Range of Activities
505 Montgomery St	9	Internal building alterations, additions or repairs
550 Montgomery St	1	Internal building alterations, additions or repairs
565 Clay St	1	Exterior Finish Improvements
559 Clay St	4	2 Street Space, 2 Internal*
475 Sansome St	10	Internal building alterations, additions or repairs
475 Sansome St	15	Internal building alterations, additions or repairs
520 Montgomery St	1	Street Space*
565 Commercial St	2	Internal building alterations, additions or repairs
215 & 217 Leidesdorff St	6	Internal building alterations, additions or repairs
565 Commercial St	3	Internal building alterations, additions or repairs
558 Sacramento St	2	Internal building alterations, additions or repairs
529 Commercial St	7	4 Street Space, 3 Internal*
415 Sansome St	1	Reroofing
405 Sansome St	2	Internal building alterations, additions or repairs
500 Sacramento St	1	1 Street Space & Sidewalk Repair*
450 Sansome St	10	Internal building alterations, additions or repairs
333 Battery St	7	Internal building alterations, additions or repairs
301 Battery St	21	Internal building alterations, additions or repairs
1 Embarcadero Center	111	9 Street Space, 102 Internal*
2 Embarcadero Center	40	Internal building alterations, additions or repairs
Source: <a href="https://sfplanning.org/resource/permits-my-neighborhood">https://sfplanning.org/resource/permits-my-neighborhood</a>		

## **APPENDIX C**

# **RECORD OF NON-APPLICABILITY AND AIR QUALITY CALCULATIONS**

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### **DRAFT**

#### **RECORD OF NON-APPLICABILITY (RONA) FOR CLEAN AIR ACT (CAA) CONFORMITY**

#### **PROPOSED GENERAL SERVICES ADMINISTRATION (GSA) APPRAISERS BUILDING AND U.S. CUSTOM HOUSE LIMITED SCOPE REPAIR & ALTERATION PROJECT SAN FRANCISCO, CALIFORNIA San Francisco Bay Area Air Basin**

### **INTRODUCTION**

The U.S. Environmental Protection Agency (USEPA) published *Determining Conformity of General Federal Actions to State or Federal Implementation Plans; Final Rule* in the 30 November 1993, Federal Register (40 Code of Federal Regulations [CFR] Parts 6, 51, and 93). This publication provides implementing guidance to document CAA Conformity Determination requirements.

Federal regulations state that no department, agency, or instrumentality of the Federal Government shall engage in, support in any way or provide financial assistance for, license to permit, or approve any activity that does not conform to an applicable implementation plan. It is the responsibility of the Federal agency to determine whether a Federal action conforms to the applicable implementation plan, before the action is taken (40 CFR Part 1, Section 51.850[a]).

The general conformity rule applies to federal actions proposed within areas which are designated as either nonattainment or maintenance areas for a National Ambient Air Quality Standard (NAAQS) for any of the criteria pollutants. Former nonattainment areas that have attained a NAAQS are designated as maintenance areas. Emissions of pollutants for which an area is in attainment are exempt from conformity analyses.

The project would occur within the San Francisco Bay Area Air Basin (SFBAAB). The Appraisers Building and U.S. Custom House, located within the SFBAAB, is in nonattainment for ozone 8-hour ozone (O<sub>3</sub>), suspended particulate matter less than or equal to 10 microns in diameter (PM<sub>10</sub>), and fine particulate matter less than or equal to 2.5 microns in diameter (PM<sub>2.5</sub>).

The annual *de minimis* levels for this region are 50 tons of volatile organic compounds (VOCs), 100 tons of oxides of nitrogen (NO<sub>x</sub>) (as the precursors to O<sub>3</sub>) and 100 tons each of PM<sub>10</sub>, and PM<sub>2.5</sub>, as listed in Table C.1. Federal actions may be exempt from conformity determinations if they do not exceed designated *de minimis* levels (40 CFR Part 1, Section 51.853[b]).

**Table C.1 Conformity *de minimis* Levels for Criteria Pollutants  
 in the SFBAAB**

Criteria Pollutant	<i>De minimis</i> Level (tons/year)
Volatile Organic Compounds (VOC)	50
Oxides of Nitrogen (NO <sub>x</sub> )	100
Suspended Particulate Matter (PM <sub>10</sub> ) (California Ambient Air Quality Standard Only)	100
Fine Particulate Matter (PM <sub>2.5</sub> )	100

**PROPOSED ACTION**

Action Proponent: GSA

Location: Appraisers Building, 630 Sansome Street, and U.S. Custom House, 555 Battery Street, San Francisco, California

Proposed Action Name: Proposed Limited Scope Repair & Alteration Project

Proposed Action & Emissions Summary: Under the Proposed Action, the GSA proposes to conduct limited repairs and improvements to the Appraisers Building and U.S. Custom House to repair, modify or replace certain building improvements and systems. The repairs will include improvements such as electrical, fire protection, curtain walls, windows, roofing, overhang canopy, elevators, exterior cladding, building systems – mechanical & plumbing, and window washing systems.

Repairs and alterations are anticipated to begin in 2022 and continue for approximately 24 months. The majority of repairs will be conducted indoors. Construction materials would be staged within the project footprint.

Sources of emission include temporary construction-related emissions from heavy duty trucks used for project delivery, off-road emissions from some fuel powered power tools, forklifts and a crane, and from vehicle use for construction crew. No changes to operation emissions from baseline are anticipated.

Table C.2 presents a summary of the emissions associated with limited scope repairs and alterations under the Proposed Action. As shown in Table C.2, emissions from the Proposed Action would be well below *de minimis* thresholds and would not trigger a formal Conformity Determination under the CAA General Conformity Rule.

**Table C.2 Project Emissions**

Emission Source	Emissions (tons/year)			
	VOCs	NO <sub>x</sub>	PM <sub>2.5</sub>	PM <sub>10</sub>
Proposed Action – Repairs and Alterations (maximum year 2022-2024)	5.7	2.3	0.14	0.14
Conformity <i>de minimis</i> Thresholds	50	100	100	100
Exceeds Conformity <i>de minimis</i> Thresholds?	No	No	No	No

*Note:* SFAAB is nonattainment for the PM<sub>10</sub> California Ambient Air Quality Standard but is shown here for completeness.

Affected Air Basin: San Francisco Bay Area Air Basin

Date RONA Prepared: September 10, 2019

RONA Prepared By: Julie Werner, PE, Scout Environmental

**PROPOSED ACTION EXEMPTION(S)**

The Proposed Action is located within a nonattainment; therefore, the Proposed Action is subject to the General Conformity Rule requirements. Because project emissions would be below *de minimis* thresholds, the project has demonstrated conformity with the requirements of the General Conformity Rule, and a formal conformity determination is not required.

There would be no significant direct or indirect impacts to air quality under this Proposed Action. Therefore, the GSA concludes that formal Conformity Determination procedures are not required, resulting in this RONA.

**RONA APPROVAL**

To the best of my knowledge, the information presented in this RONA is correct and accurate, and I concur in the finding that implementation of the Proposed Action does not require a formal CAA Conformity Determination.

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Osmahn Kadri  
NEPA Project Manager  
GSA

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Date

Appraisers Building & U.S. Custom House Limited Scope Repair and Alteration Project - San Francisco County, Annual

**Appraisers Building & U.S. Custom House Limited Scope Repair and Alteration Project  
San Francisco County, Annual**

**1.0 Project Characteristics**

**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Government Office Building	434.00	1000sqft	0.86	434,000.00	0
Government Office Building	127.00	1000sqft	0.86	127,000.00	0

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Urban	<b>Wind Speed (m/s)</b>	4.6	<b>Precipitation Freq (Days)</b>	64
<b>Climate Zone</b>	5			<b>Operational Year</b>	2024
<b>Utility Company</b>					
<b>CO2 Intensity (lb/MWhr)</b>	0	<b>CH4 Intensity (lb/MWhr)</b>	0	<b>N2O Intensity (lb/MWhr)</b>	0

**1.3 User Entered Comments & Non-Default Data**

## Appraisers Building &amp; U.S. Custom House Limited Scope Repair and Alteration Project - San Francisco County, Annual

Project Characteristics - Start date of construction is estimated based on the information provided by GSA of a "fall 2022" start. October 3rd is the first business day after the start of the 2023 government fiscal year.

Land Use - Appraisers Building is a multistory building on 0.86 acre lot per GSA. U.S. Custom House is also a multistory building on a 0.86 acre lot per GSA.

Construction Phase - Number of days of demolition, construction and renovations, and architectural coating are estimates for the purposes of the NEPA analysis. The actual project schedule will be determined by a construction contractor.

Off-road Equipment - Demolition will be indoors and on roof. Assumption is no dozers would be required. Assume a higher number of industrial saws for demolition portions.

Grading - No grading.

Off-road Equipment - Assume no grading activity.

Off-road Equipment - Assume no grading.

Off-road Equipment - Higher number of cranes and forklifts due to multiple buildings under renovation. Fewer welders assumed.

Off-road Equipment - No paving.

Off-road Equipment -

Demolition - Assume approximately 10% of interior space renovated (99,000 sf) plus 30,000 SF per roof = 159,000 SF estimated for purposes of modeling.

Trips and VMT - No site preparation, grading, or paving. Assuming 1/4 of CALEE default of 180 for construction to a crew of 45 and 27 vendor trips as not all work will happen simultaneously.

Vehicle Trips - No change from baseline emissions.

Area Coating - No change in baseline operations.

Consumer Products - No change in baseline emissions.

Energy Use - Model does not include changes to operational emissions.

Landscape Equipment - No change to baseline equipment assumed.

Water And Wastewater - Model does not include changes to operational emissions.

Solid Waste - Model does not include changes to operational emissions.

Area Mitigation -

Architectural Coating - Reduce interior and exterior areas to be painted to 10% interior and 50% exterior.

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	ConstArea_Nonresidential_Exterior	280,500.00	140,000.00
tblArchitecturalCoating	ConstArea_Nonresidential_Interior	841,500.00	84,000.00
tblAreaCoating	ReapplicationRatePercent	10	0

## Appraisers Building &amp; U.S. Custom House Limited Scope Repair and Alteration Project - San Francisco County, Annual

tblConstructionPhase	PhaseEndDate	9/11/2023	12/18/2023
tblConstructionPhase	PhaseEndDate	8/14/2023	5/20/2024
tblConstructionPhase	PhaseEndDate	10/28/2022	2/17/2023
tblConstructionPhase	PhaseEndDate	11/7/2022	11/1/2022
tblConstructionPhase	PhaseEndDate	8/28/2023	8/14/2023
tblConstructionPhase	PhaseEndDate	11/1/2022	10/28/2022
tblEnergyUse	LightingElect	3.58	0.00
tblEnergyUse	NT24E	4.80	0.00
tblEnergyUse	NT24NG	1.01	0.00
tblEnergyUse	T24E	4.10	0.00
tblEnergyUse	T24NG	18.32	0.00
tblLandUse	LotAcreage	9.96	0.86
tblLandUse	LotAcreage	2.92	0.86
tblSolidWaste	SolidWasteGenerationRate	521.73	0.00
tblTripsAndVMT	VendorTripNumber	92.00	27.00
tblTripsAndVMT	WorkerTripNumber	8.00	0.00
tblTripsAndVMT	WorkerTripNumber	8.00	0.00
tblTripsAndVMT	WorkerTripNumber	180.00	90.00
tblTripsAndVMT	WorkerTripNumber	13.00	0.00
tblVehicleTrips	WD_TR	68.93	0.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AnaerobicandFacultativeLagoonsPercent	2.21	0.00
tblWater	ElectricityIntensityFactorForWastewaterTreatment	1,911.00	0.00
tblWater	ElectricityIntensityFactorToDistribute	1,272.00	0.00
tblWater	ElectricityIntensityFactorToSupply	2,117.00	0.00
tblWater	ElectricityIntensityFactorToTreat	111.00	0.00
tblWater	IndoorWaterUseRate	111,448,083.77	0.00



## Appraisers Building &amp; U.S. Custom House Limited Scope Repair and Alteration Project - San Francisco County, Annual

tblWater	OutdoorWaterUseRate	68,306,890.05	0.00
tblWater	SepticTankPercent	10.33	0.00

## 2.0 Emissions Summary

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Appraisers Building & U.S. Custom House Limited Scope Repair and Alteration Project - San Francisco County, Annual

**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					
2022	0.1029	1.1938	0.8897	2.4600e-003	0.3054	0.0399	0.3453	0.0502	0.0377	0.0878	0.0000	234.4823	234.4823	0.0448	0.0000	235.6025
2023	5.7278	2.3027	2.3743	5.7700e-003	0.2840	0.0831	0.3671	0.0593	0.0799	0.1392	0.0000	517.7536	517.7536	0.0742	0.0000	519.6078
2024	0.0857	0.6846	0.7539	1.7800e-003	0.0448	0.0232	0.0680	0.0121	0.0224	0.0345	0.0000	156.4929	156.4929	0.0205	0.0000	157.0063
<b>Maximum</b>	<b>5.7278</b>	<b>2.3027</b>	<b>2.3743</b>	<b>5.7700e-003</b>	<b>0.3054</b>	<b>0.0831</b>	<b>0.3671</b>	<b>0.0593</b>	<b>0.0799</b>	<b>0.1392</b>	<b>0.0000</b>	<b>517.7536</b>	<b>517.7536</b>	<b>0.0742</b>	<b>0.0000</b>	<b>519.6078</b>

**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					
2022	0.1029	1.1938	0.8897	2.4600e-003	0.3054	0.0399	0.3453	0.0502	0.0377	0.0878	0.0000	234.4822	234.4822	0.0448	0.0000	235.6023
2023	5.7278	2.3027	2.3743	5.7700e-003	0.2840	0.0831	0.3671	0.0593	0.0799	0.1392	0.0000	517.7532	517.7532	0.0742	0.0000	519.6074
2024	0.0857	0.6846	0.7539	1.7800e-003	0.0448	0.0232	0.0680	0.0121	0.0224	0.0345	0.0000	156.4928	156.4928	0.0205	0.0000	157.0062
<b>Maximum</b>	<b>5.7278</b>	<b>2.3027</b>	<b>2.3743</b>	<b>5.7700e-003</b>	<b>0.3054</b>	<b>0.0831</b>	<b>0.3671</b>	<b>0.0593</b>	<b>0.0799</b>	<b>0.1392</b>	<b>0.0000</b>	<b>517.7532</b>	<b>517.7532</b>	<b>0.0742</b>	<b>0.0000</b>	<b>519.6074</b>

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	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	10-3-2022	1-2-2023	1.3134	1.3134
2	1-3-2023	4-2-2023	0.9153	0.9153
3	4-3-2023	7-2-2023	0.5215	0.5215
4	7-3-2023	10-2-2023	2.2510	2.2510
5	10-3-2023	1-2-2024	4.3220	4.3220
6	1-3-2024	4-2-2024	0.4967	0.4967
7	4-3-2024	7-2-2024	0.2608	0.2608
		Highest	4.3220	4.3220

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**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	2.1915	5.0000e-005	5.1500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	0.0100	0.0100	3.0000e-005	0.0000	0.0107
Energy	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
Mobile	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
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>2.1915</b>	<b>5.0000e-005</b>	<b>5.1500e-003</b>	<b>0.0000</b>	<b>0.0000</b>	<b>2.0000e-005</b>	<b>2.0000e-005</b>	<b>0.0000</b>	<b>2.0000e-005</b>	<b>2.0000e-005</b>	<b>0.0000</b>	<b>0.0100</b>	<b>0.0100</b>	<b>3.0000e-005</b>	<b>0.0000</b>	<b>0.0107</b>

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**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	2.1915	5.0000e-005	5.1500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	0.0100	0.0100	3.0000e-005	0.0000	0.0107
Energy	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
Mobile	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
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>2.1915</b>	<b>5.0000e-005</b>	<b>5.1500e-003</b>	<b>0.0000</b>	<b>0.0000</b>	<b>2.0000e-005</b>	<b>2.0000e-005</b>	<b>0.0000</b>	<b>2.0000e-005</b>	<b>2.0000e-005</b>	<b>0.0000</b>	<b>0.0100</b>	<b>0.0100</b>	<b>3.0000e-005</b>	<b>0.0000</b>	<b>0.0107</b>

	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
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**

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Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	10/3/2022	2/17/2023	5	20	Partial removal of select building systems as required.
2	Site Preparation	Site Preparation	10/29/2022	10/28/2022	5	2	Assume no site preparation (mowing, removing vegetation).
3	Grading	Grading	11/2/2022	11/1/2022	5	4	Assume no grading.
4	Building Construction	Building Construction	11/8/2022	5/20/2024	5	200	Construction and repair of one or more building systems during the project.
5	Paving	Paving	8/15/2023	8/14/2023	5	10	Assume no hot mix asphalt paving.
6	Architectural Coating	Architectural Coating	8/29/2023	12/18/2023	5	10	Includes roofing renovations coating repair.

**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: 84,000; Non-Residential Outdoor: 140,000; Striped Parking Area: 0 (Architectural Coating – sqft)**

**OffRoad Equipment**

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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**

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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	723.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	3	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	90.00	27.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	5	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	36.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

**3.1 Mitigation Measures Construction**

**3.2 Demolition - 2022**

**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					0.2754	0.0000	0.2754	0.0417	0.0000	0.0417	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0549	0.5402	0.4537	7.8000e-004		0.0272	0.0272		0.0254	0.0254	0.0000	68.5025	68.5025	0.0175	0.0000	68.9389
<b>Total</b>	<b>0.0549</b>	<b>0.5402</b>	<b>0.4537</b>	<b>7.8000e-004</b>	<b>0.2754</b>	<b>0.0272</b>	<b>0.3026</b>	<b>0.0417</b>	<b>0.0254</b>	<b>0.0671</b>	<b>0.0000</b>	<b>68.5025</b>	<b>68.5025</b>	<b>0.0175</b>	<b>0.0000</b>	<b>68.9389</b>



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**3.2 Demolition - 2022**

**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	8.4800e-003	0.3490	0.1275	9.4000e-004	9.4300e-003	9.5000e-004	0.0104	2.8900e-003	9.1000e-004	3.8000e-003	0.0000	101.1903	101.1903	0.0190	0.0000	101.6654
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	1.1300e-003	6.9000e-004	8.1900e-003	3.0000e-005	3.3400e-003	2.0000e-005	3.3600e-003	8.9000e-004	2.0000e-005	9.1000e-004	0.0000	2.9460	2.9460	6.0000e-005	0.0000	2.9475
<b>Total</b>	<b>9.6100e-003</b>	<b>0.3497</b>	<b>0.1357</b>	<b>9.7000e-004</b>	<b>0.0128</b>	<b>9.7000e-004</b>	<b>0.0137</b>	<b>3.7800e-003</b>	<b>9.3000e-004</b>	<b>4.7100e-003</b>	<b>0.0000</b>	<b>104.1363</b>	<b>104.1363</b>	<b>0.0191</b>	<b>0.0000</b>	<b>104.6129</b>

**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					0.2754	0.0000	0.2754	0.0417	0.0000	0.0417	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0549	0.5402	0.4537	7.8000e-004		0.0272	0.0272		0.0254	0.0254	0.0000	68.5024	68.5024	0.0175	0.0000	68.9388
<b>Total</b>	<b>0.0549</b>	<b>0.5402</b>	<b>0.4537</b>	<b>7.8000e-004</b>	<b>0.2754</b>	<b>0.0272</b>	<b>0.3026</b>	<b>0.0417</b>	<b>0.0254</b>	<b>0.0671</b>	<b>0.0000</b>	<b>68.5024</b>	<b>68.5024</b>	<b>0.0175</b>	<b>0.0000</b>	<b>68.9388</b>

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**3.2 Demolition - 2022**

**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	8.4800e-003	0.3490	0.1275	9.4000e-004	9.4300e-003	9.5000e-004	0.0104	2.8900e-003	9.1000e-004	3.8000e-003	0.0000	101.1903	101.1903	0.0190	0.0000	101.6654
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	1.1300e-003	6.9000e-004	8.1900e-003	3.0000e-005	3.3400e-003	2.0000e-005	3.3600e-003	8.9000e-004	2.0000e-005	9.1000e-004	0.0000	2.9460	2.9460	6.0000e-005	0.0000	2.9475
<b>Total</b>	<b>9.6100e-003</b>	<b>0.3497</b>	<b>0.1357</b>	<b>9.7000e-004</b>	<b>0.0128</b>	<b>9.7000e-004</b>	<b>0.0137</b>	<b>3.7800e-003</b>	<b>9.3000e-004</b>	<b>4.7100e-003</b>	<b>0.0000</b>	<b>104.1363</b>	<b>104.1363</b>	<b>0.0191</b>	<b>0.0000</b>	<b>104.6129</b>

**3.2 Demolition - 2023**

**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					0.1483	0.0000	0.1483	0.0225	0.0000	0.0225	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0258	0.2506	0.2355	4.2000e-004		0.0118	0.0118		0.0111	0.0111	0.0000	36.9015	36.9015	9.3600e-003	0.0000	37.1354
<b>Total</b>	<b>0.0258</b>	<b>0.2506</b>	<b>0.2355</b>	<b>4.2000e-004</b>	<b>0.1483</b>	<b>0.0118</b>	<b>0.1601</b>	<b>0.0225</b>	<b>0.0111</b>	<b>0.0335</b>	<b>0.0000</b>	<b>36.9015</b>	<b>36.9015</b>	<b>9.3600e-003</b>	<b>0.0000</b>	<b>37.1354</b>

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**3.2 Demolition - 2023**

**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	3.4600e-003	0.1419	0.0687	4.8000e-004	7.1800e-003	2.8000e-004	7.4700e-003	2.0700e-003	2.7000e-004	2.3400e-003	0.0000	52.6448	52.6448	0.0102	0.0000	52.9002
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	5.8000e-004	3.4000e-004	4.1200e-003	2.0000e-005	1.8000e-003	1.0000e-005	1.8100e-003	4.8000e-004	1.0000e-005	4.9000e-004	0.0000	1.5251	1.5251	3.0000e-005	0.0000	1.5258
<b>Total</b>	<b>4.0400e-003</b>	<b>0.1423</b>	<b>0.0728</b>	<b>5.0000e-004</b>	<b>8.9800e-003</b>	<b>2.9000e-004</b>	<b>9.2800e-003</b>	<b>2.5500e-003</b>	<b>2.8000e-004</b>	<b>2.8300e-003</b>	<b>0.0000</b>	<b>54.1699</b>	<b>54.1699</b>	<b>0.0103</b>	<b>0.0000</b>	<b>54.4260</b>

**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					0.1483	0.0000	0.1483	0.0225	0.0000	0.0225	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0258	0.2506	0.2355	4.2000e-004		0.0118	0.0118		0.0111	0.0111	0.0000	36.9014	36.9014	9.3600e-003	0.0000	37.1353
<b>Total</b>	<b>0.0258</b>	<b>0.2506</b>	<b>0.2355</b>	<b>4.2000e-004</b>	<b>0.1483</b>	<b>0.0118</b>	<b>0.1601</b>	<b>0.0225</b>	<b>0.0111</b>	<b>0.0335</b>	<b>0.0000</b>	<b>36.9014</b>	<b>36.9014</b>	<b>9.3600e-003</b>	<b>0.0000</b>	<b>37.1353</b>









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**3.4 Grading - 2022**

**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	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
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**3.5 Building Construction - 2022**

**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	0.0322	0.2438	0.2482	4.3000e-004		0.0115	0.0115		0.0111	0.0111	0.0000	35.4075	35.4075	6.1700e-003	0.0000	35.5617
<b>Total</b>	<b>0.0322</b>	<b>0.2438</b>	<b>0.2482</b>	<b>4.3000e-004</b>		<b>0.0115</b>	<b>0.0115</b>		<b>0.0111</b>	<b>0.0111</b>	<b>0.0000</b>	<b>35.4075</b>	<b>35.4075</b>	<b>6.1700e-003</b>	<b>0.0000</b>	<b>35.5617</b>



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**3.5 Building Construction - 2022**

**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	1.5000e-003	0.0572	0.0181	1.4000e-004	3.4400e-003	1.2000e-004	3.5600e-003	9.9000e-004	1.1000e-004	1.1100e-003	0.0000	14.1987	14.1987	1.8800e-003	0.0000	14.2458
Worker	4.7100e-003	2.8800e-003	0.0340	1.4000e-004	0.0139	1.0000e-004	0.0140	3.6900e-003	1.0000e-004	3.7800e-003	0.0000	12.2374	12.2374	2.4000e-004	0.0000	12.2433
<b>Total</b>	<b>6.2100e-003</b>	<b>0.0600</b>	<b>0.0521</b>	<b>2.8000e-004</b>	<b>0.0173</b>	<b>2.2000e-004</b>	<b>0.0175</b>	<b>4.6800e-003</b>	<b>2.1000e-004</b>	<b>4.8900e-003</b>	<b>0.0000</b>	<b>26.4360</b>	<b>26.4360</b>	<b>2.1200e-003</b>	<b>0.0000</b>	<b>26.4890</b>

**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	0.0322	0.2438	0.2482	4.3000e-004		0.0115	0.0115		0.0111	0.0111	0.0000	35.4075	35.4075	6.1700e-003	0.0000	35.5616
<b>Total</b>	<b>0.0322</b>	<b>0.2438</b>	<b>0.2482</b>	<b>4.3000e-004</b>		<b>0.0115</b>	<b>0.0115</b>		<b>0.0111</b>	<b>0.0111</b>	<b>0.0000</b>	<b>35.4075</b>	<b>35.4075</b>	<b>6.1700e-003</b>	<b>0.0000</b>	<b>35.5616</b>

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**3.5 Building Construction - 2022**

**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	1.5000e-003	0.0572	0.0181	1.4000e-004	3.4400e-003	1.2000e-004	3.5600e-003	9.9000e-004	1.1000e-004	1.1100e-003	0.0000	14.1987	14.1987	1.8800e-003	0.0000	14.2458
Worker	4.7100e-003	2.8800e-003	0.0340	1.4000e-004	0.0139	1.0000e-004	0.0140	3.6900e-003	1.0000e-004	3.7800e-003	0.0000	12.2374	12.2374	2.4000e-004	0.0000	12.2433
<b>Total</b>	<b>6.2100e-003</b>	<b>0.0600</b>	<b>0.0521</b>	<b>2.8000e-004</b>	<b>0.0173</b>	<b>2.2000e-004</b>	<b>0.0175</b>	<b>4.6800e-003</b>	<b>2.1000e-004</b>	<b>4.8900e-003</b>	<b>0.0000</b>	<b>26.4360</b>	<b>26.4360</b>	<b>2.1200e-003</b>	<b>0.0000</b>	<b>26.4890</b>

**3.5 Building Construction - 2023**

**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	0.1980	1.5224	1.6394	2.8700e-003		0.0669	0.0669		0.0646	0.0646	0.0000	236.0789	236.0789	0.0401	0.0000	237.0811
<b>Total</b>	<b>0.1980</b>	<b>1.5224</b>	<b>1.6394</b>	<b>2.8700e-003</b>		<b>0.0669</b>	<b>0.0669</b>		<b>0.0646</b>	<b>0.0646</b>	<b>0.0000</b>	<b>236.0789</b>	<b>236.0789</b>	<b>0.0401</b>	<b>0.0000</b>	<b>237.0811</b>

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**3.5 Building Construction - 2023**

**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	8.1000e-003	0.3158	0.1164	8.9000e-004	0.0229	4.5000e-004	0.0234	6.6300e-003	4.3000e-004	7.0600e-003	0.0000	92.3059	92.3059	0.0123	0.0000	92.6126
Worker	0.0297	0.0174	0.2117	8.7000e-004	0.0925	6.8000e-004	0.0931	0.0246	6.3000e-004	0.0252	0.0000	78.4314	78.4314	1.4200e-003	0.0000	78.4670
<b>Total</b>	<b>0.0378</b>	<b>0.3332</b>	<b>0.3280</b>	<b>1.7600e-003</b>	<b>0.1154</b>	<b>1.1300e-003</b>	<b>0.1165</b>	<b>0.0312</b>	<b>1.0600e-003</b>	<b>0.0323</b>	<b>0.0000</b>	<b>170.7372</b>	<b>170.7372</b>	<b>0.0137</b>	<b>0.0000</b>	<b>171.0796</b>

**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	0.1980	1.5224	1.6394	2.8700e-003		0.0669	0.0669		0.0646	0.0646	0.0000	236.0786	236.0786	0.0401	0.0000	237.0808
<b>Total</b>	<b>0.1980</b>	<b>1.5224</b>	<b>1.6394</b>	<b>2.8700e-003</b>		<b>0.0669</b>	<b>0.0669</b>		<b>0.0646</b>	<b>0.0646</b>	<b>0.0000</b>	<b>236.0786</b>	<b>236.0786</b>	<b>0.0401</b>	<b>0.0000</b>	<b>237.0808</b>

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**3.5 Building Construction - 2023**

**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	8.1000e-003	0.3158	0.1164	8.9000e-004	0.0229	4.5000e-004	0.0234	6.6300e-003	4.3000e-004	7.0600e-003	0.0000	92.3059	92.3059	0.0123	0.0000	92.6126
Worker	0.0297	0.0174	0.2117	8.7000e-004	0.0925	6.8000e-004	0.0931	0.0246	6.3000e-004	0.0252	0.0000	78.4314	78.4314	1.4200e-003	0.0000	78.4670
<b>Total</b>	<b>0.0378</b>	<b>0.3332</b>	<b>0.3280</b>	<b>1.7600e-003</b>	<b>0.1154</b>	<b>1.1300e-003</b>	<b>0.1165</b>	<b>0.0312</b>	<b>1.0600e-003</b>	<b>0.0323</b>	<b>0.0000</b>	<b>170.7372</b>	<b>170.7372</b>	<b>0.0137</b>	<b>0.0000</b>	<b>171.0796</b>

**3.5 Building Construction - 2024**

**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	0.0717	0.5587	0.6321	1.1100e-003		0.0228	0.0228		0.0220	0.0220	0.0000	91.7137	91.7137	0.0153	0.0000	92.0955
<b>Total</b>	<b>0.0717</b>	<b>0.5587</b>	<b>0.6321</b>	<b>1.1100e-003</b>		<b>0.0228</b>	<b>0.0228</b>		<b>0.0220</b>	<b>0.0220</b>	<b>0.0000</b>	<b>91.7137</b>	<b>91.7137</b>	<b>0.0153</b>	<b>0.0000</b>	<b>92.0955</b>

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**3.5 Building Construction - 2024**

**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	3.0100e-003	0.1197	0.0447	3.4000e-004	8.9100e-003	1.7000e-004	9.0800e-003	2.5800e-003	1.6000e-004	2.7400e-003	0.0000	35.5246	35.5246	4.7600e-003	0.0000	35.6436
Worker	0.0110	6.1600e-003	0.0771	3.2000e-004	0.0359	2.6000e-004	0.0362	9.5500e-003	2.4000e-004	9.7900e-003	0.0000	29.2546	29.2546	5.0000e-004	0.0000	29.2672
<b>Total</b>	<b>0.0140</b>	<b>0.1258</b>	<b>0.1218</b>	<b>6.6000e-004</b>	<b>0.0448</b>	<b>4.3000e-004</b>	<b>0.0453</b>	<b>0.0121</b>	<b>4.0000e-004</b>	<b>0.0125</b>	<b>0.0000</b>	<b>64.7792</b>	<b>64.7792</b>	<b>5.2600e-003</b>	<b>0.0000</b>	<b>64.9108</b>

**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	0.0717	0.5587	0.6321	1.1100e-003		0.0228	0.0228		0.0220	0.0220	0.0000	91.7136	91.7136	0.0153	0.0000	92.0954
<b>Total</b>	<b>0.0717</b>	<b>0.5587</b>	<b>0.6321</b>	<b>1.1100e-003</b>		<b>0.0228</b>	<b>0.0228</b>		<b>0.0220</b>	<b>0.0220</b>	<b>0.0000</b>	<b>91.7136</b>	<b>91.7136</b>	<b>0.0153</b>	<b>0.0000</b>	<b>92.0954</b>





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**3.6 Paving - 2023**

**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	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
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**3.7 Architectural Coating - 2023**

**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	5.4508					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.6700e-003	0.0521	0.0724	1.2000e-004		2.8300e-003	2.8300e-003		2.8300e-003	2.8300e-003	0.0000	10.2130	10.2130	6.1000e-004	0.0000	10.2283
<b>Total</b>	<b>5.4584</b>	<b>0.0521</b>	<b>0.0724</b>	<b>1.2000e-004</b>		<b>2.8300e-003</b>	<b>2.8300e-003</b>		<b>2.8300e-003</b>	<b>2.8300e-003</b>	<b>0.0000</b>	<b>10.2130</b>	<b>10.2130</b>	<b>6.1000e-004</b>	<b>0.0000</b>	<b>10.2283</b>



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**3.7 Architectural Coating - 2023**

**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	3.6600e-003	2.1400e-003	0.0261	1.1000e-004	0.0114	8.0000e-005	0.0115	3.0300e-003	8.0000e-005	3.1000e-003	0.0000	9.6531	9.6531	1.8000e-004	0.0000	9.6575
<b>Total</b>	<b>3.6600e-003</b>	<b>2.1400e-003</b>	<b>0.0261</b>	<b>1.1000e-004</b>	<b>0.0114</b>	<b>8.0000e-005</b>	<b>0.0115</b>	<b>3.0300e-003</b>	<b>8.0000e-005</b>	<b>3.1000e-003</b>	<b>0.0000</b>	<b>9.6531</b>	<b>9.6531</b>	<b>1.8000e-004</b>	<b>0.0000</b>	<b>9.6575</b>

**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	5.4508					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.6700e-003	0.0521	0.0724	1.2000e-004		2.8300e-003	2.8300e-003		2.8300e-003	2.8300e-003	0.0000	10.2130	10.2130	6.1000e-004	0.0000	10.2283
<b>Total</b>	<b>5.4584</b>	<b>0.0521</b>	<b>0.0724</b>	<b>1.2000e-004</b>		<b>2.8300e-003</b>	<b>2.8300e-003</b>		<b>2.8300e-003</b>	<b>2.8300e-003</b>	<b>0.0000</b>	<b>10.2130</b>	<b>10.2130</b>	<b>6.1000e-004</b>	<b>0.0000</b>	<b>10.2283</b>

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**3.7 Architectural Coating - 2023**

**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	3.6600e-003	2.1400e-003	0.0261	1.1000e-004	0.0114	8.0000e-005	0.0115	3.0300e-003	8.0000e-005	3.1000e-003	0.0000	9.6531	9.6531	1.8000e-004	0.0000	9.6575
<b>Total</b>	<b>3.6600e-003</b>	<b>2.1400e-003</b>	<b>0.0261</b>	<b>1.1000e-004</b>	<b>0.0114</b>	<b>8.0000e-005</b>	<b>0.0115</b>	<b>3.0300e-003</b>	<b>8.0000e-005</b>	<b>3.1000e-003</b>	<b>0.0000</b>	<b>9.6531</b>	<b>9.6531</b>	<b>1.8000e-004</b>	<b>0.0000</b>	<b>9.6575</b>

**4.0 Operational Detail - Mobile**

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**4.1 Mitigation Measures Mobile**

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	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	0.0000	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
Unmitigated	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

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Government Office Building	0.00	0.00	0.00		
Government Office Building	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	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
Government Office Building	9.50	7.30	7.30	33.00	62.00	5.00	50	34	16
Government Office Building	9.50	7.30	7.30	33.00	62.00	5.00	50	34	16

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Government Office Building	0.604697	0.038136	0.192426	0.089922	0.013708	0.005077	0.031210	0.009257	0.004288	0.003553	0.006262	0.000945	0.000519





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**5.3 Energy by Land Use - Electricity**

**Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Government Office Building	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Government Office Building	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**6.0 Area Detail**

**6.1 Mitigation Measures Area**

Appraisers Building & U.S. Custom House Limited Scope Repair and Alteration Project - San Francisco County, Annual

Use Low VOC Paint - Non-Residential Interior

	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	2.1915	5.0000e-005	5.1500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	0.0100	0.0100	3.0000e-005	0.0000	0.0107
Unmitigated	2.1915	5.0000e-005	5.1500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	0.0100	0.0100	3.0000e-005	0.0000	0.0107

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	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	2.1910					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	4.8000e-004	5.0000e-005	5.1500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	0.0100	0.0100	3.0000e-005	0.0000	0.0107
<b>Total</b>	<b>2.1915</b>	<b>5.0000e-005</b>	<b>5.1500e-003</b>	<b>0.0000</b>		<b>2.0000e-005</b>	<b>2.0000e-005</b>		<b>2.0000e-005</b>	<b>2.0000e-005</b>	<b>0.0000</b>	<b>0.0100</b>	<b>0.0100</b>	<b>3.0000e-005</b>	<b>0.0000</b>	<b>0.0107</b>

Appraisers Building & U.S. Custom House Limited Scope Repair and Alteration Project - San Francisco County, Annual

**6.2 Area by SubCategory**

**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	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	2.1910					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	4.8000e-004	5.0000e-005	5.1500e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	0.0100	0.0100	3.0000e-005	0.0000	0.0107
<b>Total</b>	<b>2.1915</b>	<b>5.0000e-005</b>	<b>5.1500e-003</b>	<b>0.0000</b>		<b>2.0000e-005</b>	<b>2.0000e-005</b>		<b>2.0000e-005</b>	<b>2.0000e-005</b>	<b>0.0000</b>	<b>0.0100</b>	<b>0.0100</b>	<b>3.0000e-005</b>	<b>0.0000</b>	<b>0.0107</b>

**7.0 Water Detail**

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**7.1 Mitigation Measures Water**



Appraisers Building & U.S. Custom House Limited Scope Repair and Alteration Project - San Francisco County, Annual

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

**7.2 Water by Land Use**

**Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Government Office Building	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

Appraisers Building & U.S. Custom House Limited Scope Repair and Alteration Project - San Francisco County, Annual

**7.2 Water by Land Use**

**Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Government Office Building	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

**Category/Year**

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

Appraisers Building & U.S. Custom House Limited Scope Repair and Alteration Project - San Francisco County, Annual

**8.2 Waste by Land Use**

**Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Government Office Building	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Government Office Building	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**9.0 Operational Offroad**

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Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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Appraisers Building & U.S. Custom House Limited Scope Repair and Alteration Project - San Francisco County, Annual

**10.0 Stationary Equipment**

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**Fire Pumps and Emergency Generators**

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

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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## APPENDIX D DISTRIBUTION LIST

GSA mailed project notification postcards (below) to over 500 stakeholders (residences, businesses, organizations, elected officials, and government agencies) within the immediate and adjacent project area to inform them of the Proposed Action and public scoping meeting held on August 8, 2019. See subsequent distribution list.


**General Services Administration (GSA)**  
**Public Scoping Meeting for the Appraisers Building and U.S. Customs House**  
**Environmental Assessment (EA)**  
**SAVE THE DATE**  
**Thursday, August 8, 2019, 4:00 p.m. to 7:00 p.m.**  
**Chinatown/Him Mark Lai Library, 1135 Powell Street, San Francisco, CA 94108**

**Proposed Action:** Repair, modify, or replace certain building improvements for the Appraisers Building and U.S. Customs House.


GSA is hosting a Public Scoping Meeting to discuss the EA being prepared for the Appraisers Building (630 Sansome Street) and the U.S. Customs House (555 Battery Street). GSA intends to prepare this EA to analyze the potential impacts resulting from proposed renovations associated with the GSA buildings. The project is proposed in order to bring these buildings up to current code, safety standards, and serviceable condition and to prolong their useful life. **The public is encouraged to attend and submit comments by August 31, 2019 to the following:**



Mr. Osmahn Kadri  
50 United Nations Plaza  
Room 3345, Mailbox 9  
San Francisco, CA 94102  
Or e-mail: [osmahn.kadri@gsa.gov](mailto:osmahn.kadri@gsa.gov)



Appraisers Building



U.S. Customs House

FEDERAL, STATE, LOCAL AGENCIES									
No.	AFFILIATION	TITLE	FIRST NAME	LAST NAME	COMPANY	ADDRESS1	CITY	ST	ZIP
1	City				SFDPH Environmental Health	1390 Market St, Ste 210	San Francisco	CA	94102-5403
2					SF Board of Supervisors	1 Dr Carlton B Goodlett Pl, Rm 244	San Francisco	CA	94102-4604
3	Elected Official	Office of the Mayor	London	Breed	City of San Francisco	1 Dr Carlton B Goodlett Pl, Rm 200	San Francisco	CA	94102-4604
4	Regulator		Charlie	Huang	CA Dept. of Fish & Wildlife	1700 K St, Ste 250	Sacramento	CA	95814-4016
5	Business				Bureau of Architecture	30 Van Ness Ave, #4100	San Francisco	CA	94102
6	City	Deputy Chief of Operations			San Francisco Fire Dept.	698 2nd St	San Francisco	CA	94107-2015
7	City	Director			SF Dept. of Building Inspection	1660 Mission St	San Francisco	CA	94103-2414
8	City		Carole	Ruwart	SF Dept. of Public Works	30 Van Ness Ave, Ste 5100	San Francisco	CA	94102-6029
9	City				SF Division of General Engineering Services	30 Van Ness Ave, Fl 5	San Francisco	CA	94102-6020
10	City		Beverly	Mills	SF Planning Commission	1660 Mission St	San Francisco	CA	94103-2414
11	City				SF Planning Dept.-Transportation	1650 Mission St, Ste 400	San Francisco	CA	94103-2480
12	City				SF Police Dept.	850 Bryant St	San Francisco	CA	94103-4603
13	Community				SF Bicycle Coalition	1720 Market St	San Francisco	CA	94102
14	Community Group	Executive Secretary	Larry	Myers	CA Native American Heritage Commission	915 Capital Mall, Rm 364	Sacramento	CA	95814-4801
15	Community Org.				Historical Resources Commission	PO Box 942896	Sacramento	CA	94296-0001
16	Community Org.				San Francisco Museum and Historical Society	PO Box 420470	San Francisco	CA	94142-0470
17	Community Org.	Executive Director	Charles Edwin	Chase	SF Architectural Heritage	2007 Franklin St	San Francisco	CA	94109-2909
18	Government				State Clearinghouse	PO Box 3044	Sacramento	CA	95813-3044
19	Interested Party		Bob	Jacobvitz	American Institute of Architects SF Chapter	130 Sutter St	San Francisco	CA	94104-4003
20	Regulator	State Historic Preservation Officer	Julianne	Polanco	California Office of Historic Preservation (OHP)	1725 23rd Street, Suite 100	Sacramento	CA	95816
21	Interested Party		Cathryn	Carroll	DPW: Bureau of Architecture	30 Van Ness Ave, Ste 4100	San Francisco	CA	94102-6034
22	Regulator		Henry	Hilken	Bay Area Air Quality Management District	939 Ellis St	San Francisco	CA	94109-7714
23	Regulator		Vincent	Marsh	Landmarks Preservation Board Buildings and Grounds	1660 Mission St, Fl 5	San Francisco	CA	94103-2414
24	Regulator		Dan	Welsh	USFWS	2800 Cottage Way, Ste W2605	Sacramento	CA	95825-1888
25	Transportation	Director of Planning			SF MUNI Planning Division	1 S Van Ness Ave, Fl 3	San Francisco	CA	94103-5415
26	Regulator	NEPA Reviewer	Zac	Appleton	U.S. Environmental Protection Agency, Region 9	75 Hawthorne Street, TIP-2	San Francisco	CA	94105

RESIDENCES WITHIN TWO-BLOCK RADIUS					
No.	Salutation	Address	City	St	Zip
1	Property Management (Sondor, Inc.) - REQUESTED TO POST FOR ALL RESIDENTS	500 BATTERY STREET	SAN FRANCISCO	CA	94111
2	San Francisco Community Land Trust - Columbus United Cooperative - REQUESTED TO POST FOR ALL RESIDENTS AT 53 COLUMBUS AVE	44 PAGE STREET, SUITE #401	SAN FRANCISCO	CA	94111
3	PROPERTY MANAGEMENT - REQUESTED TO POST FOR ALL 53 COLUMBUS AVE RESIDENTS	53 COLUMBUS AVENUE	SAN FRANCISCO	CA	94111
4	CURRENT RESIDENT	25 HOTALING PL UNIT A	SAN FRANCISCO	CA	94111
5	CURRENT RESIDENT	25 HOTALING PL UNIT B	SAN FRANCISCO	CA	94111
6	CURRENT RESIDENT	25 HOTALING PL UNIT C	SAN FRANCISCO	CA	94111
7	CURRENT RESIDENT	25 HOTALING PL UNIT D	SAN FRANCISCO	CA	94111
8	CURRENT RESIDENT	25 HOTALING PL UNIT E	SAN FRANCISCO	CA	94111
9	CURRENT RESIDENT	25 HOTALING PL UNIT F	SAN FRANCISCO	CA	94111
10	CURRENT RESIDENT	25 HOTALING PL UNIT G	SAN FRANCISCO	CA	94111
11	CURRENT RESIDENT	25 HOTALING PL UNIT H	SAN FRANCISCO	CA	94111
12	CURRENT RESIDENT	25 HOTALING PL UNIT I	SAN FRANCISCO	CA	94111
13	CURRENT RESIDENT	350 JACKSON ST APT 201	SAN FRANCISCO	CA	94111
14	CURRENT RESIDENT	350 JACKSON ST APT 202	SAN FRANCISCO	CA	94111
15	CURRENT RESIDENT	350 JACKSON ST APT 301	SAN FRANCISCO	CA	94111
16	CURRENT RESIDENT	350 JACKSON ST APT 302	SAN FRANCISCO	CA	94111
17	CURRENT RESIDENT	350 JACKSON ST APT 303	SAN FRANCISCO	CA	94111
18	CURRENT RESIDENT	350 JACKSON ST APT 401	SAN FRANCISCO	CA	94111
19	CURRENT RESIDENT	350 JACKSON ST APT 402	SAN FRANCISCO	CA	94111
20	CURRENT RESIDENT	350 JACKSON ST APT 501	SAN FRANCISCO	CA	94111
21	CURRENT RESIDENT	350 JACKSON ST APT 501	SAN FRANCISCO	CA	94111
22	CURRENT RESIDENT	340 PACIFIC AVE	SAN FRANCISCO	CA	94111
23	CURRENT RESIDENT	288 PACIFIC AVE UNIT 201	SAN FRANCISCO	CA	94111
24	CURRENT RESIDENT	288 PACIFIC AVE UNIT 202	SAN FRANCISCO	CA	94111
25	CURRENT RESIDENT	288 PACIFIC AVE UNIT 203	SAN FRANCISCO	CA	94111
26	CURRENT RESIDENT	288 PACIFIC AVE UNIT 204	SAN FRANCISCO	CA	94111
27	CURRENT RESIDENT	288 PACIFIC AVE UNIT 205	SAN FRANCISCO	CA	94111
28	CURRENT RESIDENT	288 PACIFIC AVE UNIT 206	SAN FRANCISCO	CA	94111
29	CURRENT RESIDENT	288 PACIFIC AVE UNIT 207	SAN FRANCISCO	CA	94111
30	CURRENT RESIDENT	288 PACIFIC AVE UNIT 208	SAN FRANCISCO	CA	94111
31	CURRENT RESIDENT	288 PACIFIC AVE UNIT 301	SAN FRANCISCO	CA	94111
32	CURRENT RESIDENT	288 PACIFIC AVE UNIT 302	SAN FRANCISCO	CA	94111
33	CURRENT RESIDENT	288 PACIFIC AVE UNIT 303	SAN FRANCISCO	CA	94111
34	CURRENT RESIDENT	288 PACIFIC AVE UNIT 304	SAN FRANCISCO	CA	94111
35	CURRENT RESIDENT	288 PACIFIC AVE UNIT 305	SAN FRANCISCO	CA	94111
36	CURRENT RESIDENT	288 PACIFIC AVE UNIT 306	SAN FRANCISCO	CA	94111
37	CURRENT RESIDENT	288 PACIFIC AVE UNIT 307	SAN FRANCISCO	CA	94111
38	CURRENT RESIDENT	288 PACIFIC AVE UNIT 308	SAN FRANCISCO	CA	94111
39	CURRENT RESIDENT	288 PACIFIC AVE UNIT 401	SAN FRANCISCO	CA	94111
40	CURRENT RESIDENT	288 PACIFIC AVE UNIT 402	SAN FRANCISCO	CA	94111
41	CURRENT RESIDENT	288 PACIFIC AVE UNIT 403	SAN FRANCISCO	CA	94111
42	CURRENT RESIDENT	288 PACIFIC AVE UNIT 404	SAN FRANCISCO	CA	94111
43	CURRENT RESIDENT	288 PACIFIC AVE UNIT 405	SAN FRANCISCO	CA	94111
44	CURRENT RESIDENT	288 PACIFIC AVE UNIT 501	SAN FRANCISCO	CA	94111
45	CURRENT RESIDENT	288 PACIFIC AVE UNIT 502	SAN FRANCISCO	CA	94111
46	CURRENT RESIDENT	288 PACIFIC AVE UNIT 503	SAN FRANCISCO	CA	94111
47	CURRENT RESIDENT	288 PACIFIC AVE UNIT 504	SAN FRANCISCO	CA	94111
48	CURRENT RESIDENT	288 PACIFIC AVE UNIT 505	SAN FRANCISCO	CA	94111
49	CURRENT RESIDENT	288 PACIFIC AVE UNIT 601	SAN FRANCISCO	CA	94111
50	CURRENT RESIDENT	288 PACIFIC AVE UNIT 602	SAN FRANCISCO	CA	94111
51	CURRENT RESIDENT	288 PACIFIC AVE UNIT 603	SAN FRANCISCO	CA	94111
52	CURRENT RESIDENT	288 PACIFIC AVE UNIT 604	SAN FRANCISCO	CA	94111
53	CURRENT RESIDENT	288 PACIFIC AVE UNIT 701	SAN FRANCISCO	CA	94111
54	CURRENT RESIDENT	288 PACIFIC AVE UNIT 702	SAN FRANCISCO	CA	94111
55	CURRENT RESIDENT	288 PACIFIC AVE UNIT 703	SAN FRANCISCO	CA	94111
56	CURRENT RESIDENT	288 PACIFIC AVE PH A	SAN FRANCISCO	CA	94111
57	CURRENT RESIDENT	733 FRONT ST UNIT 201	SAN FRANCISCO	CA	94111
58	CURRENT RESIDENT	733 FRONT ST UNIT 202	SAN FRANCISCO	CA	94111
59	CURRENT RESIDENT	733 FRONT ST UNIT 203	SAN FRANCISCO	CA	94111
60	CURRENT RESIDENT	733 FRONT ST UNIT 204	SAN FRANCISCO	CA	94111
61	CURRENT RESIDENT	733 FRONT ST UNIT 205	SAN FRANCISCO	CA	94111





## RESIDENCES WITHIN TWO-BLOCK RADIUS

No.	Salutation	Address	City	St	Zip
127	CURRENT RESIDENT	39 IRONSHIP PLZ	SAN FRANCISCO	CA	94111
128	CURRENT RESIDENT	57 IRONSHIP PLZ	SAN FRANCISCO	CA	94111
129	CURRENT RESIDENT	55 IRONSHIP PLZ	SAN FRANCISCO	CA	94111
130	CURRENT RESIDENT	53 IRONSHIP PLZ	SAN FRANCISCO	CA	94111
131	CURRENT RESIDENT	51 IRONSHIP PLZ	SAN FRANCISCO	CA	94111
132	CURRENT RESIDENT	49 IRONSHIP PLZ	SAN FRANCISCO	CA	94111
133	CURRENT RESIDENT	47 IRONSHIP PLZ	SAN FRANCISCO	CA	94111
134	CURRENT RESIDENT	45 IRONSHIP PLZ	SAN FRANCISCO	CA	94111
135	CURRENT RESIDENT	43 IRONSHIP PLZ	SAN FRANCISCO	CA	94111
136	CURRENT RESIDENT	41 IRONSHIP PLZ	SAN FRANCISCO	CA	94111
137	CURRENT RESIDENT	40 IRONSHIP PLZ	SAN FRANCISCO	CA	94111
138	CURRENT RESIDENT	58 IRONSHIP PLZ	SAN FRANCISCO	CA	94111
139	CURRENT RESIDENT	56 IRONSHIP PLZ	SAN FRANCISCO	CA	94111
140	CURRENT RESIDENT	54 IRONSHIP PLZ	SAN FRANCISCO	CA	94111
141	CURRENT RESIDENT	52 IRONSHIP PLZ	SAN FRANCISCO	CA	94111
142	CURRENT RESIDENT	50 IRONSHIP PLZ	SAN FRANCISCO	CA	94111
143	CURRENT RESIDENT	48 IRONSHIP PLZ	SAN FRANCISCO	CA	94111
144	CURRENT RESIDENT	46 IRONSHIP PLZ	SAN FRANCISCO	CA	94111
145	CURRENT RESIDENT	44 IRONSHIP PLZ	SAN FRANCISCO	CA	94111
146	CURRENT RESIDENT	42 IRONSHIP PLZ	SAN FRANCISCO	CA	94111
147	CURRENT RESIDENT	722 MONTGOMERY ST UNIT 201	SAN FRANCISCO	CA	94111
148	CURRENT RESIDENT	722 MONTGOMERY ST UNIT 202	SAN FRANCISCO	CA	94111
149	CURRENT RESIDENT	722 MONTGOMERY ST UNIT 203	SAN FRANCISCO	CA	94111
150	CURRENT RESIDENT	722 MONTGOMERY ST UNIT 204	SAN FRANCISCO	CA	94111
151	CURRENT RESIDENT	722 MONTGOMERY ST UNIT 205	SAN FRANCISCO	CA	94111
152	CURRENT RESIDENT	722 MONTGOMERY ST UNIT 206	SAN FRANCISCO	CA	94111
153	CURRENT RESIDENT	722 MONTGOMERY ST UNIT 301	SAN FRANCISCO	CA	94111
154	CURRENT RESIDENT	722 MONTGOMERY ST UNIT 302	SAN FRANCISCO	CA	94111
155	CURRENT RESIDENT	722 MONTGOMERY ST UNIT 303	SAN FRANCISCO	CA	94111
156	CURRENT RESIDENT	722 MONTGOMERY ST UNIT 304	SAN FRANCISCO	CA	94111
157	CURRENT RESIDENT	722 MONTGOMERY ST UNIT 305	SAN FRANCISCO	CA	94111
158	CURRENT RESIDENT	722 MONTGOMERY ST UNIT 306	SAN FRANCISCO	CA	94111
159	CURRENT RESIDENT	845 MONTGOMERY ST UNIT A	SAN FRANCISCO	CA	94133
160	CURRENT RESIDENT	845 MONTGOMERY ST UNIT B	SAN FRANCISCO	CA	94133
161	CURRENT RESIDENT	845 MONTGOMERY ST UNIT C	SAN FRANCISCO	CA	94133
162	CURRENT RESIDENT	845 MONTGOMERY ST UNIT D	SAN FRANCISCO	CA	94133
163	CURRENT RESIDENT	845 MONTGOMERY ST UNIT E	SAN FRANCISCO	CA	94133
164	CURRENT RESIDENT	845 MONTGOMERY ST UNIT F	SAN FRANCISCO	CA	94133
165	CURRENT RESIDENT	845 MONTGOMERY ST UNIT G	SAN FRANCISCO	CA	94133
166	CURRENT RESIDENT	845 MONTGOMERY ST UNIT H	SAN FRANCISCO	CA	94133
167	CURRENT RESIDENT	845 MONTGOMERY ST UNIT I	SAN FRANCISCO	CA	94133
168	CURRENT RESIDENT	845 MONTGOMERY ST UNIT PH1	SAN FRANCISCO	CA	94133
169	CURRENT RESIDENT	845 MONTGOMERY ST UNIT PH2	SAN FRANCISCO	CA	94133
170	CURRENT RESIDENT	845 MONTGOMERY ST UNIT PH3	SAN FRANCISCO	CA	94133
171	CURRENT RESIDENT	845 MONTGOMERY ST UNIT PH4	SAN FRANCISCO	CA	94133

BUSINESSES WITHIN A TWO-BLOCK RADIUS

No.	SALUTATION	ADDRESS	CITY	ST	ZIP
1	USL Property Management, Inc.- REQUESTED TO POST FOR ALL 601 MONTGOMERY STREET TENANTS	Property Management (Sondor, Inc.) - R	SAN FRANCISCO	CA	94111
2	Alambic Investment Management LP- REQUESTED TO POST FOR ALL 655 MONTGOMERY STREET TENANTS	San Francisco Community Land Trust - C	SAN FRANCISCO	CA	94111
3	(Transamerica Building) Transamerica Corp.- REQUESTED TO POST FOR ALL TRANSAMERICA BUILDING (600 MONTGOMERY STREET) TENANTS	PROPERTY MANAGEMENT - REQUES	SAN FRANCISCO	CA	94111
4	Starboard Commercial Real Estate - REQUESTED TO POST FOR ALL 850 MONTGOMERY STREET TENANTS	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94104
5	Property Management - REQUESTED TO POST FOR ALL 850 MONTGOMERY STREET	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94104
6	Building Manager's Office - REQUESTED TO POST FOR ALL 630 SANSOME STREET TENANTS	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
7	Anne Hill, Regional Property Manager. The Bentley Reserve - REQUESTED TO POST FOR ALL 301	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
8	CBRE - Property Management - REQUESTED TO POST FOR ALL 275 BATTERY STREET AND 755	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94105
9	PROPERTY MANAGEMENT - REQUESTED TO POST FOR ALL 275 BATTERY STREET TENANTS	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
10	PROPERTY MANAGEMENT - REQUESTED TO POST FOR ALL 755 SANSOME STREET TENANTS	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
11	Boston Properties-San Francisco. REQUESTED TO POST FOR ALL 1 AND 2 EMBARCADERO CENTER TENANTS	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
12	WM Properties - REQUESTED TO POST FOR ALL 423 WASHINGTON STREET TENANTS	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
13	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
14	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
15	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
16	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
17	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
18	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
19	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
20	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
21	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
22	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
23	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
24	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
25	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
26	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
27	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
28	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
29	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
30	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
31	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
32	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
33	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
34	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
35	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
36	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
37	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
38	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
39	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
40	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
41	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
42	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
43	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
44	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
45	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
46	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
47	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
48	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
49	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
50	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
51	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
52	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
53	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
54	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
55	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
56	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
57	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
58	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
59	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
60	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
61	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
62	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94133
63	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94133
64	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94133
65	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94133
66	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94133
67	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94133
68	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94133
69	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94133
70	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94133
71	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94133
72	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94133
73	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94133
74	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
75	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
76	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111
77	CURRENT OCCUPANT	850 MONTGOMERY STREET	SAN FRANCISCO	CA	94111





BUSINESSES WITHIN A TWO-BLOCK RADIUS

No.	SALUTATION	ADDRESS	CITY	ST	ZIP
245	CURRENT OCCUPANT	430 PACIFIC AVE	SAN FRANCISCO	CA	94133
246	CURRENT OCCUPANT	437 PACIFIC AVE	SAN FRANCISCO	CA	94133
247	CURRENT OCCUPANT	435 PACIFIC AVE FL 4	SAN FRANCISCO	CA	94133
248	CURRENT OCCUPANT	435 PACIFIC AVE FL 3	SAN FRANCISCO	CA	94133
249	CURRENT OCCUPANT	435 PACIFIC AVE STE 350	SAN FRANCISCO	CA	94133
250	CURRENT OCCUPANT	435 PACIFIC AVE STE 200	SAN FRANCISCO	CA	94133
251	CURRENT OCCUPANT	435 PACIFIC AVE STE 250	SAN FRANCISCO	CA	94133
252	CURRENT OCCUPANT	410 PACIFIC AVE	SAN FRANCISCO	CA	94133
253	CURRENT OCCUPANT	727 SANSOME ST	SAN FRANCISCO	CA	94111
254	CURRENT OCCUPANT	727 SANSOME ST FL 2	SAN FRANCISCO	CA	94111
255	CURRENT OCCUPANT	727 SANSOME ST FL 3	SAN FRANCISCO	CA	94111
256	CURRENT OCCUPANT	731 SANSOME ST STE 100	SAN FRANCISCO	CA	94111
257	CURRENT OCCUPANT	731 SANSOME ST FL 5	SAN FRANCISCO	CA	94111
258	CURRENT OCCUPANT	731 SANSOME ST FL 4	SAN FRANCISCO	CA	94111
259	CURRENT OCCUPANT	731 SANSOME ST FL 2	SAN FRANCISCO	CA	94111
260	CURRENT OCCUPANT	712 SANSOME ST	SAN FRANCISCO	CA	94111
261	CURRENT OCCUPANT	712 SANSOME ST FL 2	SAN FRANCISCO	CA	94111
262	CURRENT OCCUPANT	710 SANSOME ST	SAN FRANCISCO	CA	94111
263	CURRENT OCCUPANT	425 PACIFIC AVE	SAN FRANCISCO	CA	94133
264	CURRENT OCCUPANT	400 PACIFIC AVE FL GRND	SAN FRANCISCO	CA	94133
265	CURRENT OCCUPANT	400 PACIFIC AVE STE 2WEST	SAN FRANCISCO	CA	94133
266	CURRENT OCCUPANT	400 PACIFIC AVE STE 2EAST	SAN FRANCISCO	CA	94133
267	CURRENT OCCUPANT	400 PACIFIC AVE STE 3WEST	SAN FRANCISCO	CA	94133
268	CURRENT OCCUPANT	400 PACIFIC AVE STE 3EAST	SAN FRANCISCO	CA	94133
269	CURRENT OCCUPANT	811 SANSOME ST	SAN FRANCISCO	CA	94111
270	CURRENT OCCUPANT	821 SANSOME ST	SAN FRANCISCO	CA	94111
271	CURRENT OCCUPANT	825 SANSOME ST	SAN FRANCISCO	CA	94111
272	CURRENT OCCUPANT	768 SANSOME ST	SAN FRANCISCO	CA	94111
273	CURRENT OCCUPANT	832 SANSOME ST FL 4	SAN FRANCISCO	CA	94111
274	CURRENT OCCUPANT	832 SANSOME ST FL 3	SAN FRANCISCO	CA	94111
275	CURRENT OCCUPANT	832 SANSOME ST FL 2	SAN FRANCISCO	CA	94111
276	CURRENT OCCUPANT	832 SANSOME ST FL 1	SAN FRANCISCO	CA	94111
277	CURRENT OCCUPANT	832 SANSOME ST FL LL	SAN FRANCISCO	CA	94111
278	CURRENT OCCUPANT	394 PACIFIC AVE FL 1	SAN FRANCISCO	CA	94111
279	CURRENT OCCUPANT	394 PACIFIC AVE FL 5	SAN FRANCISCO	CA	94111
280	CURRENT OCCUPANT	394 PACIFIC AVE FL 2	SAN FRANCISCO	CA	94111
281	CURRENT OCCUPANT	325 PACIFIC AVE FL 1	SAN FRANCISCO	CA	94111
282	CURRENT OCCUPANT	325 PACIFIC AVE FL 2	SAN FRANCISCO	CA	94111
283	CURRENT OCCUPANT	325 PACIFIC AVE FL 3	SAN FRANCISCO	CA	94111
284	CURRENT OCCUPANT	840 SANSOME ST	SAN FRANCISCO	CA	94111
285	CURRENT OCCUPANT	838 SANSOME ST	SAN FRANCISCO	CA	94111
286	CURRENT OCCUPANT	619 SANSOME ST	SAN FRANCISCO	CA	94111
287	CURRENT OCCUPANT	621 SANSOME ST	SAN FRANCISCO	CA	94111
288	CURRENT OCCUPANT	368 JACKSON ST	SAN FRANCISCO	CA	94111
289	CURRENT OCCUPANT	330 JACKSON ST FL 2	SAN FRANCISCO	CA	94111
290	CURRENT OCCUPANT	326 JACKSON ST	SAN FRANCISCO	CA	94111
291	CURRENT OCCUPANT	320 JACKSON ST	SAN FRANCISCO	CA	94111
292	CURRENT OCCUPANT	321 PACIFIC AVE	SAN FRANCISCO	CA	94111
293	CURRENT OCCUPANT	315 PACIFIC AVE	SAN FRANCISCO	CA	94111
294	CURRENT OCCUPANT	603 BATTERY ST	SAN FRANCISCO	CA	94111
295	CURRENT OCCUPANT	605 BATTERY ST	SAN FRANCISCO	CA	94111
296	CURRENT OCCUPANT	615 BATTERY ST FL 6	SAN FRANCISCO	CA	94111
297	CURRENT OCCUPANT	633 BATTERY ST FL 4	SAN FRANCISCO	CA	94111
298	CURRENT OCCUPANT	633 BATTERY ST STE 103	SAN FRANCISCO	CA	94111
299	CURRENT OCCUPANT	633 BATTERY ST STE 100	SAN FRANCISCO	CA	94111
300	CURRENT OCCUPANT	633 BATTERY ST STE 110	SAN FRANCISCO	CA	94111
301	CURRENT OCCUPANT	633 BATTERY ST STE 117	SAN FRANCISCO	CA	94111
302	CURRENT OCCUPANT	633 BATTERY ST STE 118	SAN FRANCISCO	CA	94111
303	CURRENT OCCUPANT	633 BATTERY ST BSMT 88	SAN FRANCISCO	CA	94111
304	CURRENT OCCUPANT	645 BATTERY ST	SAN FRANCISCO	CA	94111
305	CURRENT OCCUPANT	318 PACIFIC AVE	SAN FRANCISCO	CA	94111
306	CURRENT OCCUPANT	310 PACIFIC AVE	SAN FRANCISCO	CA	94111
307	CURRENT OCCUPANT	316 PACIFIC AVE	SAN FRANCISCO	CA	94111
308	CURRENT OCCUPANT	701 BATTERY ST FL 1	SAN FRANCISCO	CA	94111
309	CURRENT OCCUPANT	701 BATTERY ST FL 3	SAN FRANCISCO	CA	94111
310	CURRENT OCCUPANT	701 BATTERY ST FL 2	SAN FRANCISCO	CA	94111
311	CURRENT OCCUPANT	298 PACIFIC AVE	SAN FRANCISCO	CA	94111
312	CURRENT OCCUPANT	724 BATTERY ST FL 2	SAN FRANCISCO	CA	94111
313	CURRENT OCCUPANT	724 BATTERY ST FL 1	SAN FRANCISCO	CA	94111
314	CURRENT OCCUPANT	724 BATTERY ST STE 110	SAN FRANCISCO	CA	94111
315	CURRENT OCCUPANT	292 BATTERY ST	SAN FRANCISCO	CA	94111
316	CURRENT OCCUPANT	432 CLAY ST	SAN FRANCISCO	CA	94111
317	CURRENT OCCUPANT	424 CLAY ST	SAN FRANCISCO	CA	94111
318	CURRENT OCCUPANT	408 MERCHANT ST	SAN FRANCISCO	CA	94111
319	CURRENT OCCUPANT	447 BATTERY ST STE 100	SAN FRANCISCO	CA	94111
320	CURRENT OCCUPANT	447 BATTERY ST STE 200	SAN FRANCISCO	CA	94111
321	CURRENT OCCUPANT	447 BATTERY ST STE 230	SAN FRANCISCO	CA	94111
322	CURRENT OCCUPANT	447 BATTERY ST STE 150	SAN FRANCISCO	CA	94111
323	CURRENT OCCUPANT	447 BATTERY ST STE 300	SAN FRANCISCO	CA	94111
324	CURRENT OCCUPANT	425 WASHINGTON ST STE 300	SAN FRANCISCO	CA	94111
325	CURRENT OCCUPANT	425 WASHINGTON ST STE 200	SAN FRANCISCO	CA	94111
326	CURRENT OCCUPANT	425 WASHINGTON ST STE 100	SAN FRANCISCO	CA	94111
327	CURRENT OCCUPANT	401 WASHINGTON ST	SAN FRANCISCO	CA	94111

BUSINESSES WITHIN A TWO-BLOCK RADIUS

No.	SALUTATION	ADDRESS	CITY	ST	ZIP
328	CURRENT OCCUPANT	425 BATTERY ST STE A	SAN FRANCISCO	CA	94111
329	CURRENT OCCUPANT	425 BATTERY ST STE C	SAN FRANCISCO	CA	94111
330	CURRENT OCCUPANT	425 BATTERY ST STE D	SAN FRANCISCO	CA	94111
331	CURRENT OCCUPANT	425 BATTERY ST STE E	SAN FRANCISCO	CA	94111
332	CURRENT OCCUPANT	444 BATTERY ST	SAN FRANCISCO	CA	94111
333	CURRENT OCCUPANT	500 BATTERY ST	SAN FRANCISCO	CA	94111
334	CURRENT OCCUPANT	555 FRONT ST	SAN FRANCISCO	CA	94111
335	CURRENT OCCUPANT	250 CLAY ST	SAN FRANCISCO	CA	94111
336	CURRENT OCCUPANT	555 BATTERY ST STE 121	SAN FRANCISCO	CA	94111
337	CURRENT OCCUPANT	555 BATTERY ST STE 125	SAN FRANCISCO	CA	94111
338	CURRENT OCCUPANT	555 BATTERY ST STE 504	SAN FRANCISCO	CA	94111
339	CURRENT OCCUPANT	570 BATTERY ST	SAN FRANCISCO	CA	94111
340	CURRENT OCCUPANT	556 BATTERY ST	SAN FRANCISCO	CA	94111
341	CURRENT OCCUPANT	215 JACKSON ST	SAN FRANCISCO	CA	94111
342	CURRENT OCCUPANT	244 JACKSON ST FL 1	SAN FRANCISCO	CA	94111
343	CURRENT OCCUPANT	244 JACKSON ST FL 4	SAN FRANCISCO	CA	94111
344	CURRENT OCCUPANT	244 JACKSON ST FL 3	SAN FRANCISCO	CA	94111
345	CURRENT OCCUPANT	244 JACKSON ST FL 2	SAN FRANCISCO	CA	94111
346	CURRENT OCCUPANT	209 JACKSON ST	SAN FRANCISCO	CA	94111
347	CURRENT OCCUPANT	205 JACKSON ST	SAN FRANCISCO	CA	94111
348	CURRENT OCCUPANT	600 BATTERY ST FL 1	SAN FRANCISCO	CA	94111
349	CURRENT OCCUPANT	600 BATTERY ST FL 2	SAN FRANCISCO	CA	94111
350	CURRENT OCCUPANT	600 BATTERY ST FL 3	SAN FRANCISCO	CA	94111
351	CURRENT OCCUPANT	220 JACKSON ST STE 310	SAN FRANCISCO	CA	94111
352	CURRENT OCCUPANT	220 JACKSON ST STE 300	SAN FRANCISCO	CA	94111
353	CURRENT OCCUPANT	220 JACKSON ST STE 200	SAN FRANCISCO	CA	94111
354	CURRENT OCCUPANT	201 JACKSON ST	SAN FRANCISCO	CA	94111
355	CURRENT OCCUPANT	200 JACKSON ST	SAN FRANCISCO	CA	94111
356	CURRENT OCCUPANT	607 FRONT ST	SAN FRANCISCO	CA	94111
357	CURRENT OCCUPANT	611 FRONT ST	SAN FRANCISCO	CA	94111
358	CURRENT OCCUPANT	615 FRONT ST	SAN FRANCISCO	CA	94111
359	CURRENT OCCUPANT	733 FRONT ST STE 110	SAN FRANCISCO	CA	94111
360	CURRENT OCCUPANT	733 FRONT ST STE C1A	SAN FRANCISCO	CA	94111
361	CURRENT OCCUPANT	733 FRONT ST STE C1	SAN FRANCISCO	CA	94111
362	CURRENT OCCUPANT	733 FRONT ST OFC	SAN FRANCISCO	CA	94111
363	CURRENT OCCUPANT	639 FRONT ST FL 1	SAN FRANCISCO	CA	94111
364	CURRENT OCCUPANT	639 FRONT ST FL 4	SAN FRANCISCO	CA	94111
365	CURRENT OCCUPANT	639 FRONT ST FL 3	SAN FRANCISCO	CA	94111
366	CURRENT OCCUPANT	639 FRONT ST FL 2	SAN FRANCISCO	CA	94111
367	CURRENT OCCUPANT	649 FRONT ST STE 344	SAN FRANCISCO	CA	94111
368	CURRENT OCCUPANT	649 FRONT ST FL 1	SAN FRANCISCO	CA	94111
369	CURRENT OCCUPANT	649 FRONT ST STE 300	SAN FRANCISCO	CA	94111
370	CURRENT OCCUPANT	649 FRONT ST STE 200	SAN FRANCISCO	CA	94111
371	CURRENT OCCUPANT	653 FRONT ST	SAN FRANCISCO	CA	94111
372	CURRENT OCCUPANT	151 JACKSON ST	SAN FRANCISCO	CA	94111
373	CURRENT OCCUPANT	145 JACKSON ST	SAN FRANCISCO	CA	94111
374	CURRENT OCCUPANT	4 MARITIME PLZ	SAN FRANCISCO	CA	94111
375	CURRENT OCCUPANT	430 DAVIS CT	SAN FRANCISCO	CA	94111
376	CURRENT OCCUPANT	460 DAVIS CT	SAN FRANCISCO	CA	94111
377	CURRENT OCCUPANT	735 BATTERY ST FL 1	SAN FRANCISCO	CA	94111
379	CURRENT OCCUPANT	735 BATTERY ST FL 2	SAN FRANCISCO	CA	94111
400	CURRENT OCCUPANT	735 BATTERY ST FL 3	SAN FRANCISCO	CA	94111
401	CURRENT OCCUPANT	190 PACIFIC AVE	SAN FRANCISCO	CA	94111