Changes to the EA

The following pages provide a summary record of all proposed text amendments to the Draft EA. These amendments serve as clarifications, amplifications, and minor updates on the content of the Draft EA. The amendments serve to clarify and strengthen the content of the Draft EA, but do not introduce significant new information.

Changes in text are signified by strikeouts (~~strikeouts~~) where text is removed and by underlined font (underline font) where text is added. Other minor clarifications and corrections to typographical errors are also shown as corrected in this format, including corrections not based on responses to comments.

Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes ☒ No ☐	***Hazardous Materials*** Sites known to contain hazardous soils or groundwater conditions in San Francisco are governed by San Francisco Health Code Article 22A, also known as the Maher Ordinance, which is administered by the San Francisco Department of Public Health (SFDPH). The site is currently located in a mapped Maher Area. AllWest Environmental (AllWest) conducted a Phase I Environmental Site Assessment (ESA) at the project site in February 2019 and several follow-up Phase II ESAs and indoor air quality assessments from June 2019 to July 2020. The Phase I ESA, Phase II ESAs, and indoor air quality assessments are included as Attachment B and are summarized in detail below. ***Hazardous Conditions On-site*** There is an ~~open~~ active Voluntary Cleanup case (Department of Toxic Substances Control [DTSC] case ~~2020-~~#60003063 2020), an inactive DTSC Voluntary Cleanup case #60003000 2022), ~~on the project site~~ and an~~the~~ open SFDPH Site Mitigation Program ~~has a~~ case ~~open~~ related to the development of 2550 Irving Street (SMED No. on the project site 2043). The Phase I ESA revealed evidence of ~~two~~ recognized environmental conditions (RECs) in connection with the project site: the site was previously occupied by two gasoline service stations and a dry cleaner. Additionally, a former dry cleaner was located upgradient from the project site. In 2019 and 2020, AllWest prepared several Phase II ESAs (non-American Society for Testing and Materials [ASTM] compliant) at the project site. Reportedly, the concentrations of total petroleum hydrocarbons within the motor oil range (TPH-mo) in soil exceeded Tier 1 Environmental Screening Levels (ESLs) for residential land use odor/nuisance and

		concentrations of tetrachloroethylene (PCE) (a volatile organic compound [VOC]) and TPH within the gasoline range (TPH-g) detected in soil vapor exceeded commercial/industrial Tier 1 ESLs for soil vapor (San Francisco Bay Regional Water Quality Control Board [RWQCB] 2019). Additionally, in 2019 and 2020, AllWest conducted several indoor air quality assessments, in which PCE concentrations were detected above respective commercial/industrial ESLs for indoor air (Attachment B). In 2021, Path Forward Partners, Inc. prepared a Final Response Plan for the proposed affordable housing project at the project site. The purpose was to mitigate the public health and safety hazards that were determined in the above investigations and achieve the Response Action Objective (RAO) for the project site, intended to "minimize or eliminate exposures between future building occupants and VOCs present in site soil gas." Path Forward Partners, Inc. proposed three alternatives including no action, soil excavation, and vapor mitigation, and determined that "Alternative 3 – Vapor Intrusion Mitigation System, Land Use Covenant, and Operations and Maintenance" was the appropriate course of action because it "would achieve RAOs, be protective of human health and the environment, and have a much lower impact on the adjacent community as compared to Alternative 2 [soil excavation] while being a cost-effective remedy." According to the Final Response Plan, the Vapor Intrusion Mitigation System (VIMS) would include a "sub-slab wind-assisted passive venting system", and sub-slab sections would include a gravel layer, gas-collection piping, dilution-air, soil gas probes, vapor-barrier membrane, and upgradeability (meaning the system would have the ability to replace "any wind-driven turbine with a continuously running mechanical fan, if ever necessary"). VIMS implementation, including inspections, repairs, and confirmation sampling, would be under the oversight of the owner, general contractor, VIMS design engineer, and regulatory agency. A letter from DTSC dated September 2, 2021, indicates that the Response Plan was approved for implementation (Attachment B). Additionally, Path Forward Partners, Inc. stated that a Land Use Covenant (LUC) would be prepared for the site, which would include, at least, prohibiting "residential or commercial (including daycare) occupancy without engineering controls (i.e., VIMS in place, confirmed operating as designed)," performing "annual LUC inspections of

		building ground-floor slab, and VIMS, with LUC inspection reports submitted for DTSC approval," and "conducting prudential, voluntary 5-year reviews, to be submitted for DTSC approval." In conjunction with the LUC, both a California Land Use and Revitalization Act (CLRRA)-compliant Operations and Management (O&M) Plan and a VIMS O&M Plan would be implemented at the site. Given the project site's location in a mapped Maher Area, the development would be required to comply with the requirements of the Maher Ordinance. Path Forward Partners, Inc. stated that, "It is expected that the SFDPH, who oversees activities related to the Maher Ordinance, will indicate that the Site characterization and mitigation process conducted by TNDC [Tenderloin Neighborhood Development Corporation] and TPCU [The Police Credit Union] under DTSC oversight will effectively meet the requirements of the Maher Ordinance." Additionally, "TNDC has volunteered to prepare a Site Management Plan [SMP]," which is to be comprised of "response action implementation procedures, including dust and vapor control, and monitoring measures during construction activities." In addition, the project site SMP would include procedures to ensure construction worker safety and manage soil contamination, in the event it is encountered during construction. A copy of the Final Response Plan is included in Attachment B. The most recent EnviroStor website document available online for the project site release cases is a community update newsletter dated June 6, 2022, which states that the available data indicates distribution of PCE is most concentrated in the Irving Street right-of-way, the September 2021 and March 2022 sampling results indicate that the six northern residences are safe to occupy (including for sensitive populations such as children and the elderly), and DTSC approved the Response Plan for the ~~proposed affordable housing development~~project in September 2021, which would require installation of a vapor mitigation system underneath the proposed development to prevent PCE in soil vapor from entering the indoor air. The community update newsletter also indicates that the "proposed housing development is not responsible for remediating off-site PCE contamination; such liability is the responsibility of other Responsible Parties.". A review of SWRCB GeoTracker and DTSC

		EnviroStor open release sites within 2,000 feet of the project site was conducted on ~~December 14, 2021~~ July 27, 2022. There are no open SWRCB GeoTracker release cases present within 2,000 feet of the project site, however ~~and~~ there ~~is one~~ are two DTSC EnviroStor open release cases within 2,000 feet of the project site: a site at 1300 26th Avenue and 2495 Irving Street, and the former Albrite Cleaners site at 2511 Irving Street. There is an open release case (Site code: 60003141) located south of the project site at 2511 Irving Street, across Irving Street ("Site"). The open release case is reportedly a former dry cleaning facility (former Albrite Cleaners) with PCE impacts onsite. The most recent document available online at the EnviroStor website is a community update newsletter dated June 6, 2022, which ~~states that the available data indicates distribution of PCE is most concentrated in the Irving Street right-of way.~~ DTSC met with the property owner and consultant on May 20, 2022 to define the next phase of investigation for this property. It also indicates that an investigation report with April 2022 sampling data is expected to be posted on Envirostor by July 2022. ~~It further states that the DTSC conducted indoor air sampling of PCE from March 2, 2022 to March 4, 2022 at six residences north of the Site and determined that the residences are safe to occupy, including for sensitive populations, without mitigation.~~ An Imminent and Substantial Endangerment Determination and Order and Remedial Action Order for 2511 Irving Street (Former Albrite Cleaners) dated October 29, 2021 states that three Subsurface Investigations were conducted in July 2019, May 2020, and August 2020 at the 2525 Irving Street property, directly ~~south~~ west of the ~~site~~former drycleaner and along Irving Street to the north. The measured levels of PCE detected in these investigations exceed the "human health screening levels for soil gas defined by the San Francisco Bay RWQCB and DTSC by two orders of magnitude and pose a potential unacceptable health risk in soil vapor for residential land use." This subsurface investigation information was included in the reports completed and summarized above for the ~~Site~~ project site. **Mitigation Measures** **HAZ-1: Regulatory Agency Involvement – DTSC and SFDPH Site Assessment and Mitigation (SAM).** Because there are two ~~is an open~~ Voluntary Cleanup cases (DTSC cases ~~2020~~ #60003063 ~~2020~~ and #60003000) on the project site and the SFDPH Site Mitigation Program has a

		case open related to the development of 2550 Irving Street (SMED No. 2043), DTSC and SAM shall continue to be utilized for agency oversight of assessment and remediation within the project through completion of building demolition, subsurface grading/excavation, and construction of facilities. Additionally, the applicant shall notify both DTSC and SAM of the following: ▪ Current development plan and any modifications to the development plan ▪ Unexpected underground features ▪ All former environmental documents completed for the project site Upon notification of the information above, DTSC and SAM could require actions such as: development of subsurface investigation workplans; completion of soil, soil vapor, and/or groundwater subsurface investigations; installation of soil vapor or groundwater monitoring wells; soil excavation and offsite disposal; completion of human health risk assessments; and/or completion of remediation reports or case closure documents. The project applicant shall retain a qualified environmental consultant (Professional Geologist [PG] or Professional Engineer [PE]) to conduct additional assessment or remediation work as required by DTSC and SAM. If groundwater wells, soil vapor monitoring probes, or sub-slab vapor points are identified during demolition, subsurface demolition, or construction at the project site, they shall be abandoned/destroyed by a qualified environmental consultant under permit from the SFDPH. Demolition activities shall be documented in a letter report submitted to SFDPH, SAM, and DTSC within 60 days of the completion of abandonment activities. It should also be noted that DTSC may determine that RWQCB or SAM may be best suited to perform the lead agency duties for assessment and/or remediation at the project site. Should the lead agency be transferred to RWQCB or SAM, this and other mitigation measures shall still apply to these agencies. **HAZ-2: Vapor Mitigation System.** As approved by DTSC on September 2, 2021, the project applicant will implement the September 2, 2021 Final Response Plan prepared by Path Forward for the 2550 Irving Street Affordable Housing Project. The Final Response Plan includes implementation of a VIMS. As specified by DTSC, the project applicant and contractor shall incorporate a vapor barrier

		membrane during construction, the implementation of which would prevent the potential for soil gas VOCs from migrating to indoor air. DTSC will review and approve the VIMS design prior to construction. The project applicant and SFDPH will review the VIMS design prior to construction. **HAZ-3: Remediation.** The project applicant shall retain a qualified environmental consultant (PG or PE), to prepare a SMP prior to construction. The SMP, or equivalent document, shall be prepared to address onsite handling and management of impacted soils or other impacted wastes, and reduce hazards to construction workers and offsite receptors during construction. The plan must establish remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the site. These measures and practices may include, but are not limited to: ▪ Stockpile management including stormwater pollution prevention and the installation of Best Management Practices (BMPs) ▪ Proper disposal procedures of contaminated materials ▪ Monitoring and reporting ▪ A health and safety plan for contractors working at the site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection The health and safety plan shall also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction. DTSC will review and approve the SMP prior to demolition and grading (construction) activities. The project applicant and SFDPH will review the SMP prior to demolition and grading (construction) activities. If soil present within the construction envelope at the development site contains chemicals at concentrations exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), the project applicant shall retain a qualified environmental consultant (PG or PE) to conduct additional analytical testing and recommend soil disposal recommendations, or consider other remedial engineering controls, as necessary for the proposed development. The qualified environmental consultant shall utilize

		the development site analytical results for waste characterization purposes prior to offsite transportation or disposal of potentially impacted soils or other impacted wastes. The qualified environmental consultant shall provide disposal recommendations and arrange for proper disposal of the waste soils or other impacted wastes (as necessary), and/or provide recommendations for remedial engineering controls, as appropriate for the proposed development. Remediation of impacted soils and/or implementation of remedial engineering controls may require additional delineation of impacts; additional analytical testing per landfill or recycling facility requirements; soil excavation; and offsite disposal or recycling. DTSC shall review and approve the development of site disposal recommendations prior to transportation of waste soils offsite, and review and approve remedial engineering controls, prior to construction. The project applicant and SFDPH shall review the disposal recommendations prior to transportation of waste soils offsite and review remedial engineering controls, prior to construction. ***Toxic Air Containments Off-site*** The BAAQMD has an online mapping tool that provides screening level risks and hazards for facilities permitted by the air district. The *Permitted Stationary Source Risks and Hazards Screening Tool* provides the chronic cancer risks (in millions), $PM_{2.5}$ concentration (micrograms per cubic meters [$\mu g/m^3$]), and hazard indices at each facility. Based on average daily traffic volume from the San Francisco Municipal Transportation Agency and using a one percent increase assumption, the 2021 daily traffic on Lincoln Way would be approximately 11,800 vehicles. Using CARB's screening recommendations, the roadway would not be considered a high-traffic urban roadway and the project site is over 500 feet from the roadway. Furthermore, the site is not located in an Air Pollutant Exposure Zone, so it is not in proximity to major air pollution sources, such as busy roadways. However, pursuant with the requirements of the 2019 California Energy Code (Title 24, Part 6), new high-rise residential (defined as four or more habitable stories) construction is required to install Minimum Efficiency Reporting Value (MERV) 13 or equivalent filters for heating and cooling ventilation systems (refer to Section 120.1(b)1.C). If there are potential impacts from Lincoln Way then the inclusion of filtration would lessen exposure.

		No permitted stationary sources were identified within 1,000 feet of the project's site boundary. A search of the SWRCB GeoTracker online database was conducted on December 21, 2021. The search identified five listed sites within a 2,000-foot radius. Of the five listed sites, there are three active DTSC Cleanup Sites, two of which include the project site and its ongoing cleanup efforts. A search of the DTSC EnviroStor online database was conducted on December 21, 2021. The search identified three listed sites within a 2,000-foot radius. Of the three listed sites, two are identified as the project site and its ongoing cleanup efforts. The third site is identified as the former location of Albrite cleaners and is a state response site. Therefore, future onsite receptors would not be exposed substantial concentrations of toxic air containments from off-site sources. **Source List: 60, Attachment B, Attachment E**

Energy Consumption	2	Project construction activities would also use building materials that would require energy use during the manufacturing and/or procurement of that material. However, this analysis reasonably assumes that manufacturers of building materials such as concrete, steel, lumber, or other building materials would employ energy conservation practices in the interest of minimizing the cost of doing business. Therefore, the consumption of energy required for the manufacturing and/or procurement of building and construction material is not within the scope of this analysis. Residential development on the project site would use energy produced in regional power plants using hydropower and natural gas, oil, coal, and nuclear fuels. On-site development would be required to meet current state and local standards regarding energy consumption, including Title 24 of the California Code of Regulations enforced by the DBI. Beyond compliance with the 2019 San Francisco Green Building Code and Title 24 requirements, the project would be required to achieve GreenPoint Rated status, or achieve a status of LEED Silver. To reach the applicable standards, the project would involve the application of green building measures. The project would also be required to comply with the City's All-Electric Ordinance, which prohibits natural gas infrastructure in new construction. Since the project would be required to adhere to 2019 California Green Building Standards, and would include energy reducing design features, the proposed action would not result in foreseeable energy inefficiencies and would not have a substantial adverse effect on energy consumption. **Source List: 44**