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BY E-MAIL AND US MAIL

May 1, 2026

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RE: 11-15 Marina Boulevard (Marina Safeway) AB 2011 Application [Project #: 2025-011405PRJ].

Dear Director Phillips, President Campbell, Vice-President Moore, Honorable Commissioners and Mr. Horn:

I am writing on behalf of Marina Community Association ("MCA"), Cow Hollow Association ("CHA"), Golden Gate Valley Neighborhood Association ("GGVNA"), and Marina-Cow Hollow Neighbors and Merchants ("MCHNM"), all nonprofit organizations for the public benefit; and Neighborhoods United SF ("NUSF"), an alliance of community organizations. These long-established organizations are deeply concerned with the specific, adverse impacts of this project on our neighborhoods.

NUSF hereby objects to the Notice of Conditional Project Eligibility for AB 2011 ("AB 2011 Notice") issued by the City Planning Department staff on March 11 2026 for a project ("Project") proposed by Marina Property Owner, LLC, and Align Real Estate ("Align") at 11-15 Marina Blvd, San Francisco ("Project Site"). As discussed below, the Project does not qualify for streamlining under the newly adopted AB 2011 (Gov. Code section 65912.100, et seq.) or SB 330. While the Project may or may not be allowed to proceed, without AB 2011, it may not be exempted from review under the California Environmental Quality Act ("CEQA"), and public hearings are required before the City Planning Commission and Board of Supervisors because the

Project flagrantly violates applicable objective height, density and setback requirements. CEQA review is necessary to analyze and mitigate the Project's impacts and to propose feasible mitigation measures and alternatives. Public hearings are Constitutionally required to allow the affected community to have a voice in a Project that will impact the neighborhood and the entire City for decades to come.

I. Project Description.

Align proposes to construct an approximately 800-unit mixed use residential project on the Project Site, which is currently occupied by a Safeway grocery store constructed in 1959. The Project consists of two towers, one 20-stories and one 25-stories that would yield just under a million square feet, including 721,120 square feet of housing, 63,220 square feet for the replacement grocery store, and 161,020 square feet for the subterranean garage.

The Project Site is currently zoned for a maximum of 40-feet in height and 4-stories. The Project vastly exceeds existing, objective zoning limits. Align seeks to skirt zoning requirements by invoking the State Density Bonus Law, (Gov. Code section 65915), and seeks to avoid review under the California Environmental Quality Act ("CEQA") by invoking the recently enacted AB 2011. Without AB 2011, project review would be required under CEQA since the Density Bonus Law ("DBL") does not exempt the Project from CEQA review. The court of appeal has held that the City must comply both with CEQA and the DBL. (*Wollmer v City of Berkeley* (2011) 193 Cal.App.4th 1329, 1349.) Also, without reliance on AB 2011, the Project would be required to go through normal review and appeals before the City Planning Commission since the Project is wildly inconsistent with applicable height, setback and density requirements.

II. AB 2011

AB 2011 creates a streamlined "ministerial" approval process for certain residential projects proposed on commercial properties. Since the AB 2011 process is "ministerial," CEQA review is not required, and public hearings are not allowed.

However, AB 2011 contains several very important exceptions. The Legislature excluded from AB 2011 any projects that will have significant listed environmental impacts. In creating these exceptions, the Legislature made clear that AB 2011 was only intended to be used for run-of-the-mill residential projects without significant listed environmental impacts. AB 2011 expressly provides that streamlining is not allowed under the law if unless the project "satisfies the requirements specified in subparagraphs (B) to (K), inclusive, of paragraph (6) of subdivision (a) of Section 65913.4." Section 65913.5(a)(6) (SB 35), identifies categories of projects that are not subject to CEQA streamlining, if the project site is in the coastal zone, on prime farmland, wetlands, very high fire hazard severity zone, hazardous waste site listed pursuant to Section 65962.5 (the "Cortese List"), within an earthquake fault zone, with a flood hazard zone, habitat for special status species, lands under conservation easement. As discussed below, the Project fails to meet several requirements of Section 65913.4(a)(6).

A. The Project is not Subject to AB 2011 Because the Project Site is a Hazardous Material Site Listed on the Cortese List.

The Align Project is not entitled to streamlining under AB 2011 because it is a contaminated site on the State's Cortese List. The Project Site is contaminated with toxic chemicals far above residential screening levels due to over 60-years of industrial use.

A project is not entitled to streamlining under AB 2011 if the project site, is "A hazardous waste site that is listed pursuant to Section 65962.5 …" unless certain exceptions apply. (Gov. Code section 65913.4(a)(6)(E).)_The applicant also cannot use SB 330 streamlining of the Project site is so listed. (Gov. Code section 65941.1.)

Government Code section 65962.5 is commonly known as the "Cortese List." The Cortese List is the State's list of contaminated sites, which is required to be updated annually. (Gov. Code § 65962.5) The Cortese list is a list of sites that have, or have had, contaminated soil, water, air, vapor intrusion, negative health impacts on the public safety and/or impact local governments. The name came from the Legislator who authored the legislation that was enacted in 1985. Therefore, the Cortese list references the various federal and state agencies that report on and sometimes enforce environmental standards, such as those listed under CEQA. (See, California EPA, Cortese List Background and History, https://calepa.ca.gov/sitecleanup/corteselist/background/).

The Cortese List, is composed of five lists compiled by various state agencies, (Gov. Code § 65962.5(a)): (1) All hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code; (2) All land designated as hazardous waste property or border zone property pursuant to Article 11 (commencing with Section 25220) of Chapter 6.5 of Division 20 of the Health and Safety Code; (3) All information received by the Department of Toxic Substances Control pursuant to Section 25242 of the Health and Safety Code on hazardous waste disposals on public land; (4) All sites listed pursuant to Section 25356 of the Health and Safety Code; (5) All sites included in the Abandoned Site Assessment Program.

The largest portion of the Cortese List is the GeoTracker database, compiled with the State Water Board. 15 Marina Boulevard is listed on GeoTracker and is therefore on the Cortese List. The Project Sites' Geotracker listing is attached hereto as Exhibit A. Since the Project Site is on the Cortese List, the Project may not be streamlined under AB 2011 and is not subject to SB 330.

The Project Site has a long history of heavy industrial use. The Project Site overlies an area that was previously part of San Francisco Bay's Gashouse Cove before the filling of the northwest portion of the Site began in the latter half of the 1800s. The Site was used for industrial purposes beginning in about 1893 by Phelps Manufacturing Company, which made screws, cables, and rail car components using coal-fired furnaces and boilers. In about 1900, the Site was cleared, and a steam electric plant was constructed, which appears on the 1905 Sanborn Fire Insurance Map. The steam electric plant was operated until 1942. During the course of operations, Pacific Gas and Electric Company first leased and later acquired the plant. In 1956, the former plant was dismantled, and the Site was redeveloped into a grocery store that continues to operate. The Project Site included three above-ground storage tanks ("ASTs"), including one massive AST containing over 1.2 million gallons of petroleum products. (See Exhibit B, Illustrated Site Chronology)

The Water Board found an "exceedance of the Commercial/Industrial Direct Exposure Soil Environmental Screening Level (ESL) is in a 5.5-foot depth sample at SWB-06B… Multiple VOCs [volatile organic compounds] as well as TPHg were detected in soil vapor samples above their laboratory reporting limit. Chloroform and tetrachloroethene (PCE) were detected in soil vapor samples at concentrations exceeding the RWQCB commercial/industrial ESLs of 18 micrograms per cubic meter (µg/m3) and 67 µg/m3, respectively." (SFRWQCB Letter p. 9 (Nov. 27, 2024) (Exhibit C).) Chloroform and PCE are chemicals known to cause cancer in humans. It is important to note that these tests found toxic and cancer-causing chemicals above commercial-industrial levels. Residential levels are far lower and more health protective.

The GeoTracker website contains a recent report by the Langan firm dated Feb. 20, 2026. That report states that six out of 32 soil samples "contained concentrations of TPHd [total petroleum hydrocarbons diesel] exceeding the Commercial/Industrial ESLs [environmental screening levels]." (Langan p. 2 (Feb. 20, 2026) (Exhibit D)). Langan recommended 14 additional test borings to further delineate the extent and nature of the contamination.

The Water Board issued a "closure" letter on November 27, 2024. However, the closure expressly stated that it was issued only for commercial-industrial uses, and that any change of use would require further evaluation. This is because much higher levels of contamination are allowed at commercial-industrial sites, where adult workers are exposed for at most 8-hours per day, whereas must more stringent cleanup levels are required for residential uses, where sensitive populations such as infants and elderly people may be exposed up to 24-hours per day. The Water Board letter states:

> While the information provided indicates the subject site is satisfactorily cleaned up to standards consistent with intended commercial/industrial land use, we may reconsider these findings should land use change, the configuration of site features change, or new information be discovered regarding previously undetected contamination. (RWQCB Letter, p. 1, (Nov. 27, 2024) (Exhibit C).

Since the proposed streamlined Project would change use from commercial-industrial to residential, the closure letter is no longer valid. Also, the more recent report from Langan identified significant toxic contamination that constitutes "new information."

Finally, despite the Water Board's commercial-industrial closure letter, the Project Site remains on the Cortese List. (Exhibit A). While there is a process to have a site removed from the Cortese List, that has not occurred.

The court of appeal has held that Cortese List sites may not be exempted from CEQA review even if they are listed as "closed." As the Court of Appeal has stated, "We agree that the Legislature intended that projects on these [Cortese List] sites should not be categorically exempt from CEQA because they may be more likely to involve significant effects on the environment." (*Parker Shattuck Neighbors v. Berkeley City Council,* 222 Cal. App. 4th 768, 781 (2013); *McQueen v. Mid-Peninsula Board*, 202 Cal.App.3d 1136, 1149, ("the known existence of…..hazardous wastes on property to be acquired is an unusual circumstance threatening the environment" and the project may not be exempted from CEQA review); *Association for a Cleaner Environment v. Yosemite Comm. College*, 110 Cal.App.4th 629 (2004) (presence of

hazardous materials makes CEQA exemption improper).) The CEQA statute states: "No project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code [Cortese List] shall be exempted from this division pursuant to subdivision (a)[categorical exemptions]." (Pub. Res. Code § 21084(c).) While AB 2011 is a statutory exemption, not a categorical exemption, it has expressly imported the Cortese List exception via referent to Government Code section 65913.4(a)(6), so the same legal requirements and rationale applies.

In short, since the Project Site is on the Cortese List, it is not subject to streamlining under AB 2011.

B. The Applicant Failed to Disclose the Project Site's Presence on the Cortese List.

The Applicant and Agency failed to disclose that the Project Site is on the Cortese list. The Applicant's AB 2011 application states falsely that the Project Site is not on the Cortese List. The City Planning Department's AB 2011 Preliminary Approval also falsely states that the Project Site is not on the Cortese List.

CEQA requires the lead agency to disclose the existence of a site on the Cortese List at the time the Project is first proposed and considered by the agency, and the Government Code requires project applications for any development to submit a hazardous waste statement to the lead agency identifying the project site's presence on the Cortese List. PRC § 21092.6(a) ("lead agency shall consult the lists compiled pursuant to Section 65962.5 of the Government Code to determine whether the project and any alternatives are located on a site which is included on any list…The lead agency shall specify the list and include the information in the statement required pursuant to subdivision (f) of Section 65962.5 of the Government Code, in the notice required pursuant to Section 21080.4, a negative declaration, and a draft environmental impact report"); Gov. Code § 65962.5 (applicant for any development project shall consult the lists of sites affected by hazardous wastes and submit a signed statement indicating whether the project and any alternatives are located on affected site before agency can accept application as complete).

In this case, Align failed to provide the hazardous waste statement to the City in their Project application, and the City failed to make known to the public that the site was on the Cortese List. The Applicant and City may argue that the fact that the Project Site was "closed" to commercial-industrial standards renders the Cortese Listing ineffective. Such an argument is contrary to the plain language of the statute. There is no CEQA provision or case law that distinguishes between sites on the Cortese List for which remediation has been performed and those for which it has not. Quite the opposite. Guidelines section 15300.2(e) broadly applies to projects "located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code." 14 CCR §15300.2(e) (emphasis added). Under the Guidelines, it is the mere fact of a site's inclusion on the Cortese List – not the status of remediation efforts –that governs the preclusion of a categorical exemption under CEQA. "The statute's plain meaning controls the court's interpretation." (*Green v. State of California* (2007) 42 Cal.4th 254, 260.) Here, CEQA's plain language states that if a project site is located on the Cortese List, then it may not be exempted from CEQA. It does not state, "unless the project is listed as closed." There are good reasons for the broad language. The fact that a site is listed on the Cortese List means that at some time there was significant contamination on the property. The CEQA drafters may well have

believed that the fact of historical contamination should at least trigger an Initial Study to determine if any residual contamination remains above levels appropriate for the new project. This is precisely the case here, where the site was allegedly cleaned up to commercial standards, but not residential.

C. The Project is not Subject to AB 2011 Because it is Not Consistent with "Objective Standards."

To qualify for streamlining under AB 2011, a project must be consistent with "objective zoning standards." (Gov. Code section 65912.113 (f).) The Project violates the objective height standards set forth in the zoning code of 4-stories and 40-feet. It also violates objective setback and density standards applicable to the site. The Project also violates the objective shadow standards set forth in Proposition M, codified in the San Francisco zoning code at Section 295 of the San Francisco Planning Code. Shadow analysis is an objective science. The attached shadow map shows that the Project will cast significant shadows over the adjacent park at Fort Mason. (Exhibit E). Since the Project fails to comply with objective zoning standards, it is not subject to streamlining under AB 2011.

D. The Project is not Subject to AB 2011 Because it is in a Flood Zone.

A project is not subject to AB 2011 if it is "Within a special flood hazard area subject to inundation by the 1 percent annual chance flood (100-year flood) as determined by the Federal Emergency Management Agency in any official maps published by the Federal Emergency Management Agency." (Gov. Code section 65913.4(a)(6)(G).) The site is within a known "vulnerability zone" bounded by the historic shoreline within Marina Blvd, Bay St, Laguna St, and Fillmore St.. The Marina has been subject to frequent flooding (much more than once every 100 years) The San Francisco Department of Public Works issued a report in 2022 documenting flooding problems in the immediate area. (Exhibit F). The site is completely within San Francisco's Tsunami Evacuation and Inundation Zones Map. There is actually a street sign on the west side of Buchanan at North Point that says: "Leaving Tsunami Evacuation Zone." (https://sfgov.maps.arcgis.com/apps/instant/basic/index.html?appid=05ed171c2be8403fb7368be2284bf2ff.)

The Project Site is also in a liquefaction zone and a tsunami evacuation zone. While AB 2011 does not expressly exclude tsunami and liquefaction zones, when the combined risk of contamination, plus liquefaction, plus tsunami, plus groundwater interaction exists, this raises unusual circumstances showing that this Project will have highly significant environmental risks that the Legislature intended to exclude from streamlining under AB 2011.

E. The Project May not be Subject to AB 2011 Because it Requires the Destruction of a Historic Resource.

AB 2011 streamlining is not allowed if "The development would require the demolition of a historic structure that was placed on a national, state, or local historic register." (Gov. Code section 65912.121(h)(3). The Marina Safeway is a potential historic building. It was one of the first modern Safeway stores, designed by master architect William Wurster, and was prototype for stores that followed. The Project requires destruction of this historic building. The project is not

subject to AB 2011 or SB 330 and therefore a standard Historic Resource Evaluation would be required under CEQA.

F. Inadequate Sewer Infrastructure.

The Project Site lacks adequate sewer infrastructure. The Department of Public Works has documented serious overflows of the combined sewer systems that serves the area. (Exhibit F). The sewer system is already overflowing raw sewage into people's homes, creating a significant public health and safety risk. Adding another 800 residential units will only exacerbate this public health risk. This is precisely the type of impact on public services that should be analyzed and mitigated through CEQA review.

G. Tribal Consultation is Required.

The AB 2011 Application wrongly states that tribal consultation is not required. This is incorrect. Government Code section 65912.111(h) requires tribal "consultation as described by Section 21080.3.1 of the Public Resources Code," for development on any "vacant site." Vacant site is defined in San Francisco as:

1. Any undeveloped parcel containing no existing buildings;
2. Any parcel that contains only a surface parking lot and no existing buildings, except buildings that are accessory to a surface parking lot use, such as a guard station or kiosk, whether or not said surface parking lot was established with the benefit of a permit; or
3. Any parcel over 15,000 square feet in size that contains a surface parking lot use, structures that are accessory to a surface parking lot use, such as those supporting General Advertising Signs, and a building that does not exceed 800 square feet in building area.

(Planning Director's Bulletin No. 9).

The Project includes two sites: 11 Marina Blvd, and 15 Marina Blvd. While 15 Marina Blvd. is not vacant (it has the Safeway Store), 11 Marina Blvd. is a vacant site and is subject to tribal consultation. 11 Marina contains only a parking lot and no existing buildings. While the Applicant seeks to merge the two sites, they are currently not merged and the 11 Marina site is subject to tribal consultation.

III. AB 2011 IS UNCONSTITUTIONAL.

A. AB 2011 Unconstitutionally Grants Non-Delegable Zoning Authority to Private Parties.

Municipalities cannot lawfully delegate their legislative or police power to others. (*Kugler v. Yocum* (1968) 69 Cal.2d 371, 375.) "An unconstitutional delegation of authority occurs when a legislative body (1) leaves the resolution of fundamental policy issues to others or, (2) fails to provide adequate direction for the implementation of that policy." (*Carson Mobilehome Park*

Owners' Assn. v. City of Carson (1983) 35 Cal.3d 184, 190.) The City's approval of the Project unconstitutionally delegates the City's police powers by allowing rezoning and general plan overrides through Density Bonus Law determinations without meaningful City discretion, in violation of constitutional non-delegation principles (see *Kugler v. Yocum, supra*).

Approval of the Project with the added density and waivers of development standards requested by Align pursuant to the Density Bonus Law unlawfully delegates the City's police powers to a private entity because it delegates to Align the power to rezone the Project parcel, to amend numerous general plan and zoning policies that apply to the Project parcel, or to obtain a variance from applicable general plan and municipal development code requirements. The City's general plan establishes the City's fundamental policies governing land use development. "Because of its broad scope, long-range perspective, and primacy over subsidiary land-use decisions, the general plan has been aptly described as the constitution for all future developments within the city or county." (*Denham, LLC v. City of Richmond* (2019) 41 Cal.App.5th 340, 344 [internal quotes omitted].) The State Planning and Zoning Law requires "uniformity" of zoning rules within zoning districts, stating: "All such [zoning] regulations shall be uniform for each class or kind of building or use of land throughout each zone, but the regulation in one type of zone may differ from those in other types of zones." (Government Code, § 65852; *Neighbors in Support of Appropriate Land Use v. County of Tuolumne* (2007) 157 Cal.App.4th 997, 1008.) The State Planning and Zoning Law also requires vertical consistency between local agencies general plans, zoning ordinances, and land use permits. (Government Code § 65860(c) ["County or city zoning ordinances shall be consistent with the general plan of the county or city"]; see *DeVita v. County of Napa* (1995) 9 Cal.4th 763, 772 ["A general plan is a "'constitution' for future development' [citation omitted] located at the top of 'the hierarchy of local government law regulating land use'"].) The Density Bonus Law forces the City to violate these fundamental requirements of zoning and general plan consistency, in violation of state law and the Constitution.

Both state and City planning law provide a process for landowners to obtain a "variance" from the "uniformity" of zoning limits that, while appropriate for the zone district in general, would impose undue hardship due to unique characteristics of a specific parcel. Government Code section 65906 governs the grant of zoning variances by municipalities and prohibits local agencies from granting "special privileges" to individual landowners. The City's zoning limits height to 40-feet or four-stories. The 25-story Project is wildly out of scale with the neighborhood, clearly violates the City General Plan's density and building scale policies, and clearly violates the City's development code standards that apply to the zone district.

For the City to approve this gross land use aberration based on the requirements of the Density Bonus Law would unconstitutionally delegate the City's police powers to the applicant. By authorizing a private business entity to waive an unlimited number of development standards, such approval delegates to a private party the power to rezone the project parcel, to amend numerous general plan policies that apply to the project parcel, or to obtain a variance from applicable general plan and development code requirements. The power to rezone, to amend the general plan, or to grant a variance are core police powers of the City that require the exercise of discretion to determine whether granting such relief is in the public interest. Neither the state legislature nor the City, nor both acting in concert, have the legal authority to delegate the resolution of such fundamental policy issues to others. Even if they could, the delegation in this

case fails to provide adequate direction for the implementation of those policies. (See e.g., *Bayside Timber Co. v. Board of Supervisors* (1971) 20 Cal.App.3d 1).

B. AB 2011 Denies the Public Constitutional Due Process Rights.

AB 2011 unconstitutionally infringes on the due process rights of nearby property owners. Absent SB 2011, a mixed-use project of this size requires that the City consider whether to issue a discretionary use permit and whether to grant variances. It is well-settled that nearby property owners who may suffer deprivation of substantial property rights have a procedural due process right to notice and opportunity to be heard before approval of such a use permit. (*Horn v. County of Ventura* (1979) 24 Cal.3d 605, 612.) This right attaches to discretionary, adjudicatory decisions, which include the City's decision to issue a use permit. (Ibid.) When a local zoning official, by oversight or legal error combined with the operation of AB 2011, causes an otherwise ineligible project to be deemed consistent with AB 2011's eligibility criteria as a matter of law, neighboring property owners who may suffer deprivation of substantial property interests would be deprived of their due process right to notice and opportunity to be heard before issuance of a discretionary use permit.

The Legislature and City cannot deprive its citizens of constitutional due process rights. (*Selinger v. City Council* (1989) 216 Cal.App.3d 259, 274 (*Selinger*.) In *Selinger*, the applicant for a subdivision map contended that the agency inaction caused the permit to be approved by the passage of time and agency inaction pursuant to the automatic approval provision of the Permit Streamlining Act (PSA). *Selinger* held the PSA's automatic approval provision unconstitutional because it leads to approval of development applications without providing notice and a hearing to affected landowners. AB 2011 similarly deprives the public of any constitutionally required due process hearing.

CONCLUSION

As discussed above, the Project does not qualify for streamlining under either AB 2011 or SB 330. Therefore, review is required under CEQA. Also, public notice and hearings are required before the Planning Commission.

Sincerely,

Richard Toshiyuki Drury
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CC:
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EXHIBIT A

STATE WATER RESOURCES CONTROL BOARD
GEOTRACKER

CASE SUMMARY

REPORT DATE | HAZARDOUS MATERIAL INCIDENT REPORT FILED WITH OES?

I. REPORTED BY -
UNKNOWN

CREATED BY
UNKNOWN

III. SITE LOCATION

FACILITY NAME
SF Marina Safeway

FACILITY ID

FACILITY ADDRESS
15 Marina Boulevard
San Francisco, CA 94123
SAN FRANCISCO COUNTY

ORIENTATION OF SITE TO STREET

CROSS STREET

V. SUBSTANCES RELEASED / CONTAMINANT(S) OF CONCERN

CRUDE OIL
TOTAL PETROLEUM HYDROCARBONS (TPH)

VI. DISCOVERY/ABATEMENT

DATE DISCHARGE BEGAN

DATE DISCOVERED | HOW DISCOVERED | DESCRIPTION

DATE STOPPED | STOP METHOD | DESCRIPTION

VII. SOURCE/CAUSE

SOURCE OF DISCHARGE

CAUSE OF DISCHARGE

DISCHARGE DESCRIPTION

VIII. CASE TYPE

CASE TYPE

IX. REMEDIAL ACTION

NO REMEDIAL ACTIONS ENTERED

X. GENERAL COMMENTS

This property is a former steam electric power plant that operated between about 1900 and 1942. Crude oil was the fuel for energy generation. During investigations around the edge of the property in 2017, some petroleum contamination was discovered in soil. During spring 2023, an investigation of soil, soil gas and groundwater was performed.

XI. CERTIFICATION

I HEREBY CERTIFY THAT THE INFORMATION REPORTED HEREIN IS TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE.

XII. REGULATORY USE ONLY

LOCAL AGENCY CASE NUMBER | REGIONAL BOARD CASE NUMBER

LOCAL AGENCY

UNKNOWN
REGIONAL BOARD
UNKNOWN

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EXHIBIT B

Marina Safeway – 11 and 15 Marina Boulevard, San Francisco, Ca
Site Chronology

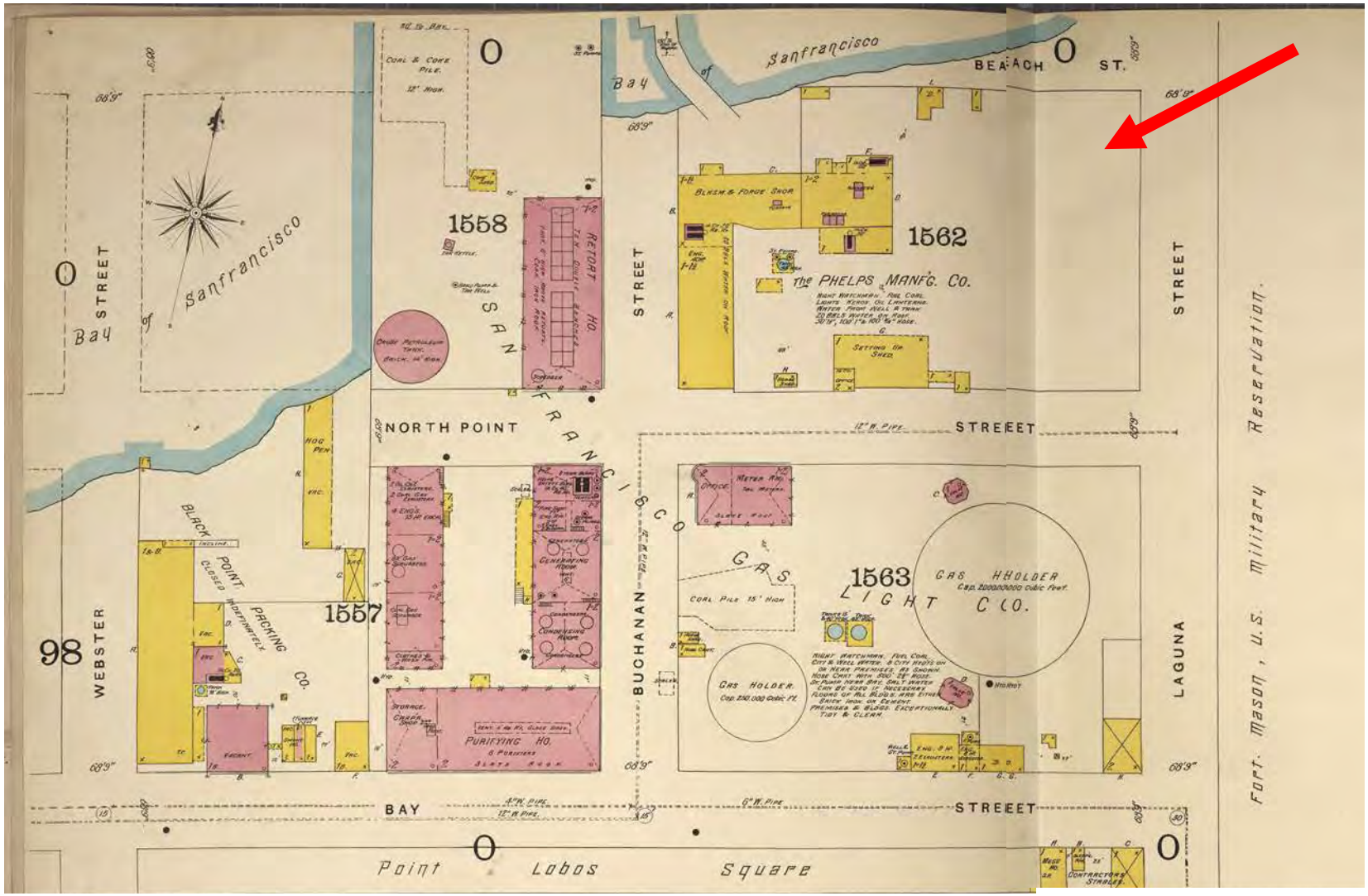

Figure 1: 1893 Sanborn Fire Insurance Map. Detail Vol 4 Sheets 123b Left and Right. Ilustrates Phelps Manufacturing Co. Blacksmith Forge and Shops. Source: SFPL FIMO.

Marina Safeway – 11 and 15 Marina Boulevard, San Francisco, Ca
Site Chronology

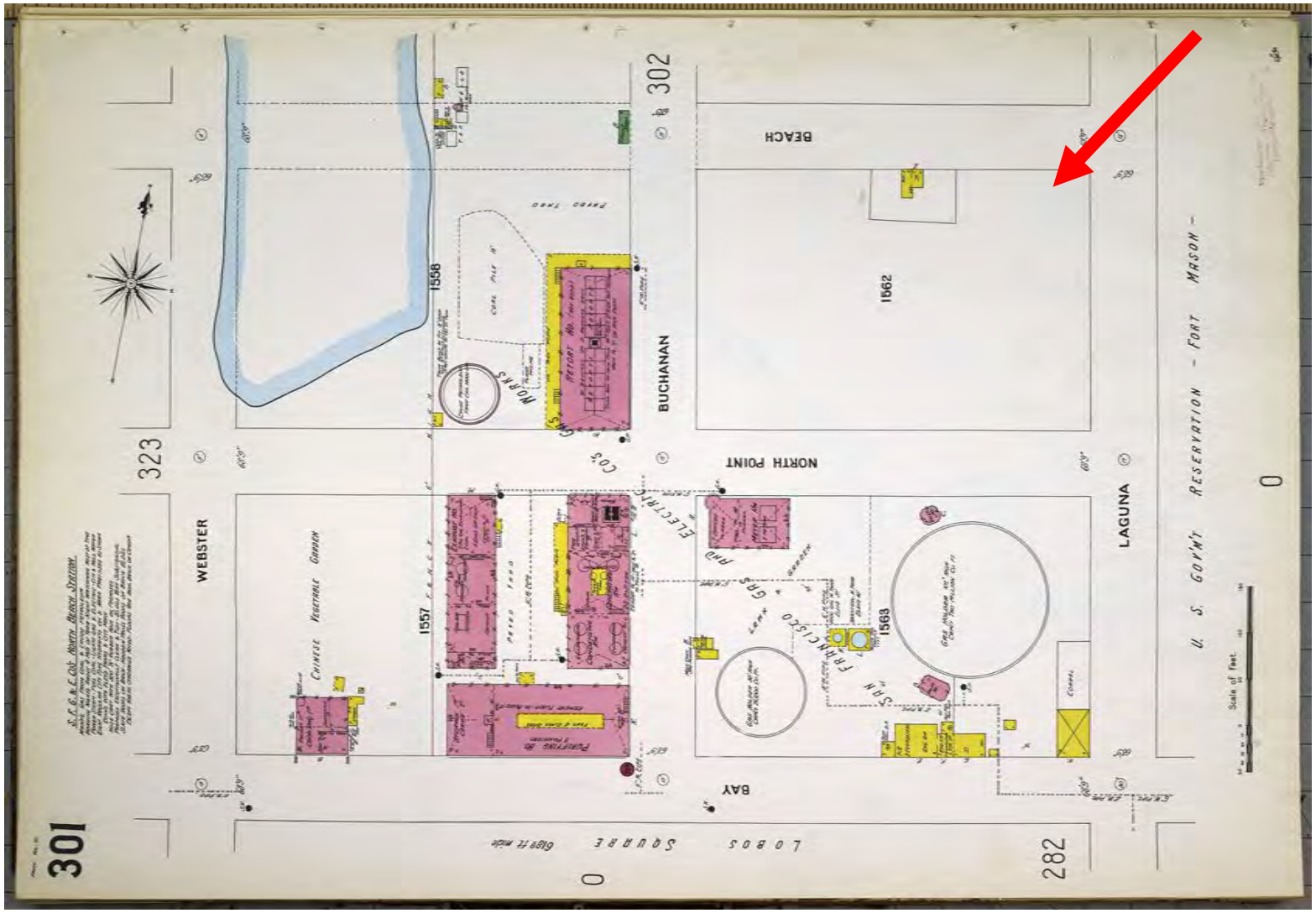

Figure 2: 1899 Sanborn Fire Insurance Map. Detail Vol 3 Sheet 301. Shows primarily vacant land except small dwelling. Blacksmith operation has been removed. Source: SFPL FIMO.

Marina Safeway – 11 and 15 Marina Boulevard, San Francisco, Ca
Site Chronology

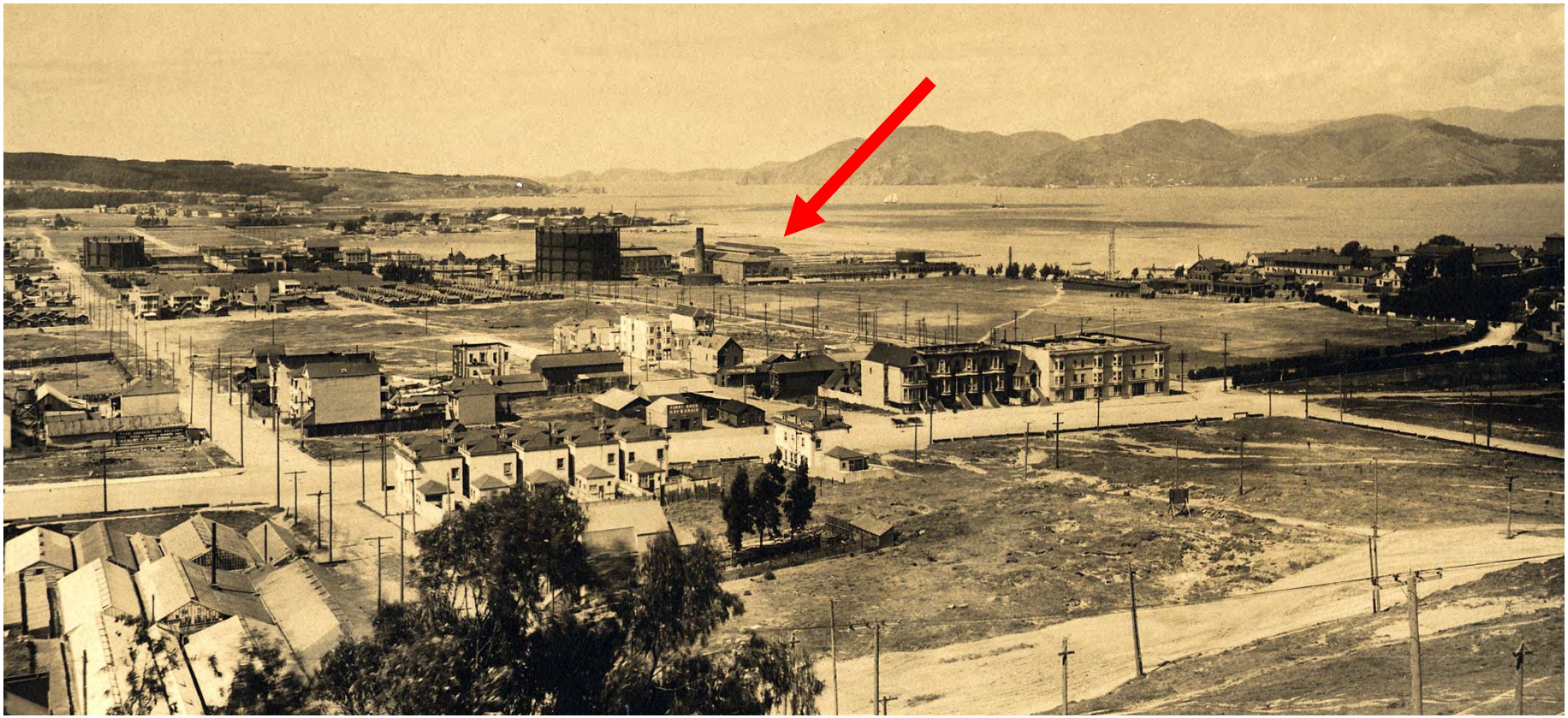

Figure 3: Detail of 1890 view from Russian Hill showing newly constructed buildings and oil tanks at site. Source: SFPL History Center AAB-9207.

Marina Safeway – 11 and 15 Marina Boulevard, San Francisco, Ca
Site Chronology

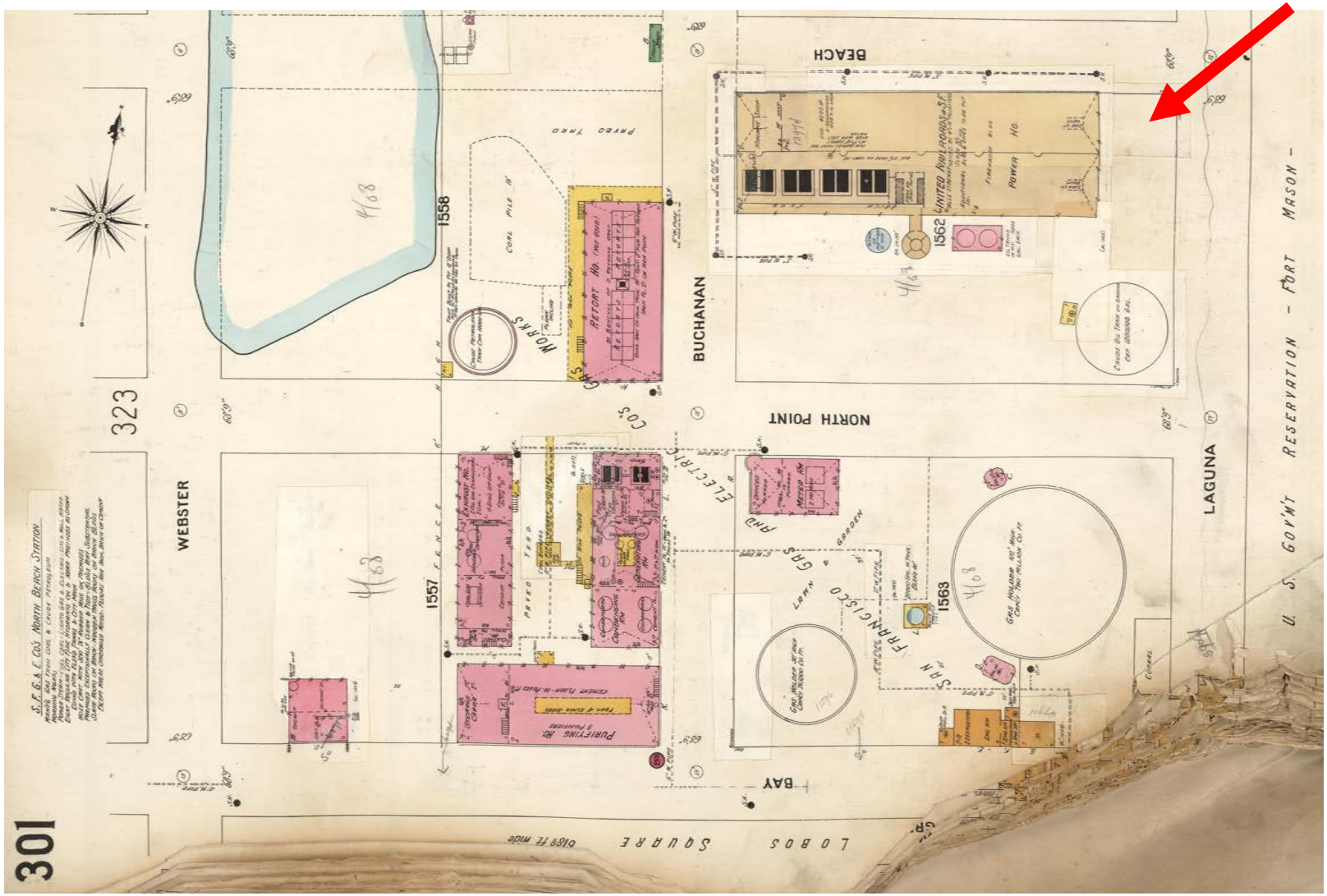

Figure 4: 1905 Sanborn Fire Insurance Map. Detail Vol 3 Sheet 301. Illustrates multiple oil tanks on 11 Marina Blvd parcel. Source: David Rumsey Maps.

Marina Safeway – 11 and 15 Marina Boulevard, San Francisco, Ca
Site Chronology

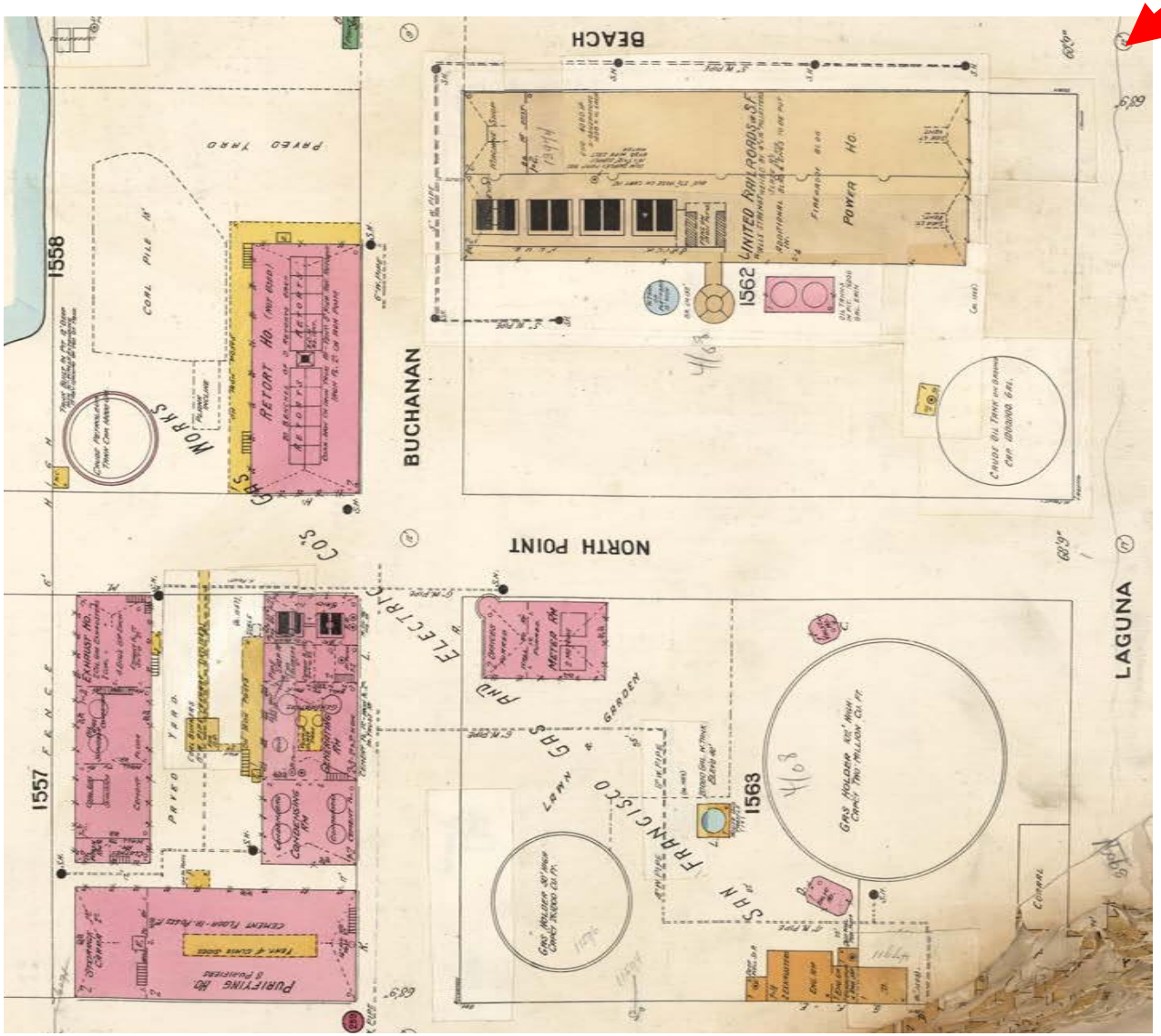

Figure 5: Detail 1905 Sanborn Fire Insurance Map. Detail Vol 3 Sheet 301. Source: David Rumsey Maps.

Marina Safeway – 11 and 15 Marina Boulevard, San Francisco, Ca
Site Chronology

Figure 6: Circa 1906-07. Just after 1906 Earthquake. Rebuilding of large tank to north of site. Temporary tent camps visible in what is now Moscone Park and at Fort Mason. Source: SFPL History Center AAB-9347.

Marina Safeway – 11 and 15 Marina Boulevard, San Francisco, Ca
Site Chronology

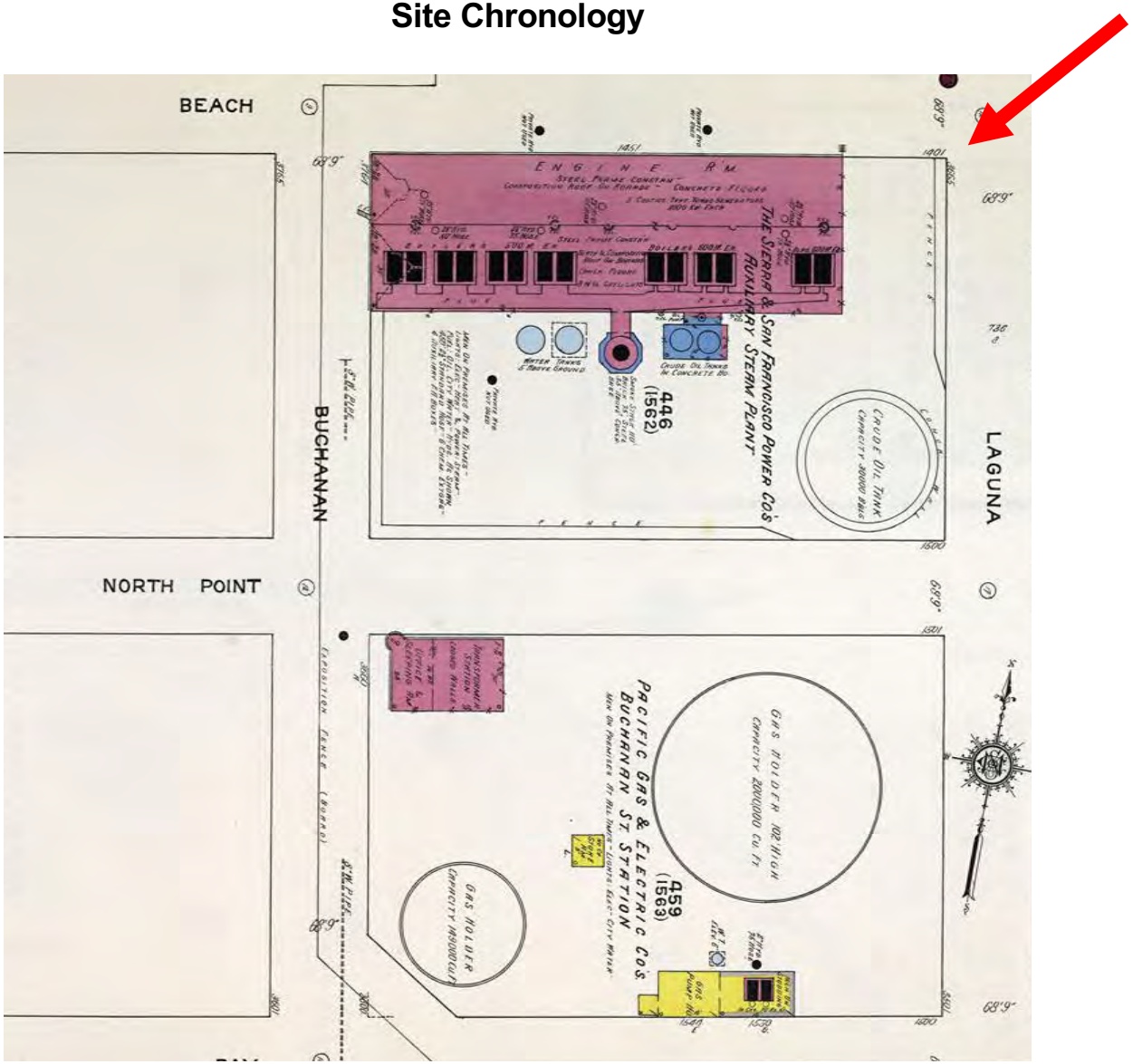

Figure 7: 1913 Sanborn Fire Insurance Map. Detail Vol 3 Sheet 245. Continues to show multiple oil tanks on the site. Source: SFPL FIMO

Marina Safeway – 11 and 15 Marina Boulevard, San Francisco, Ca
Site Chronology

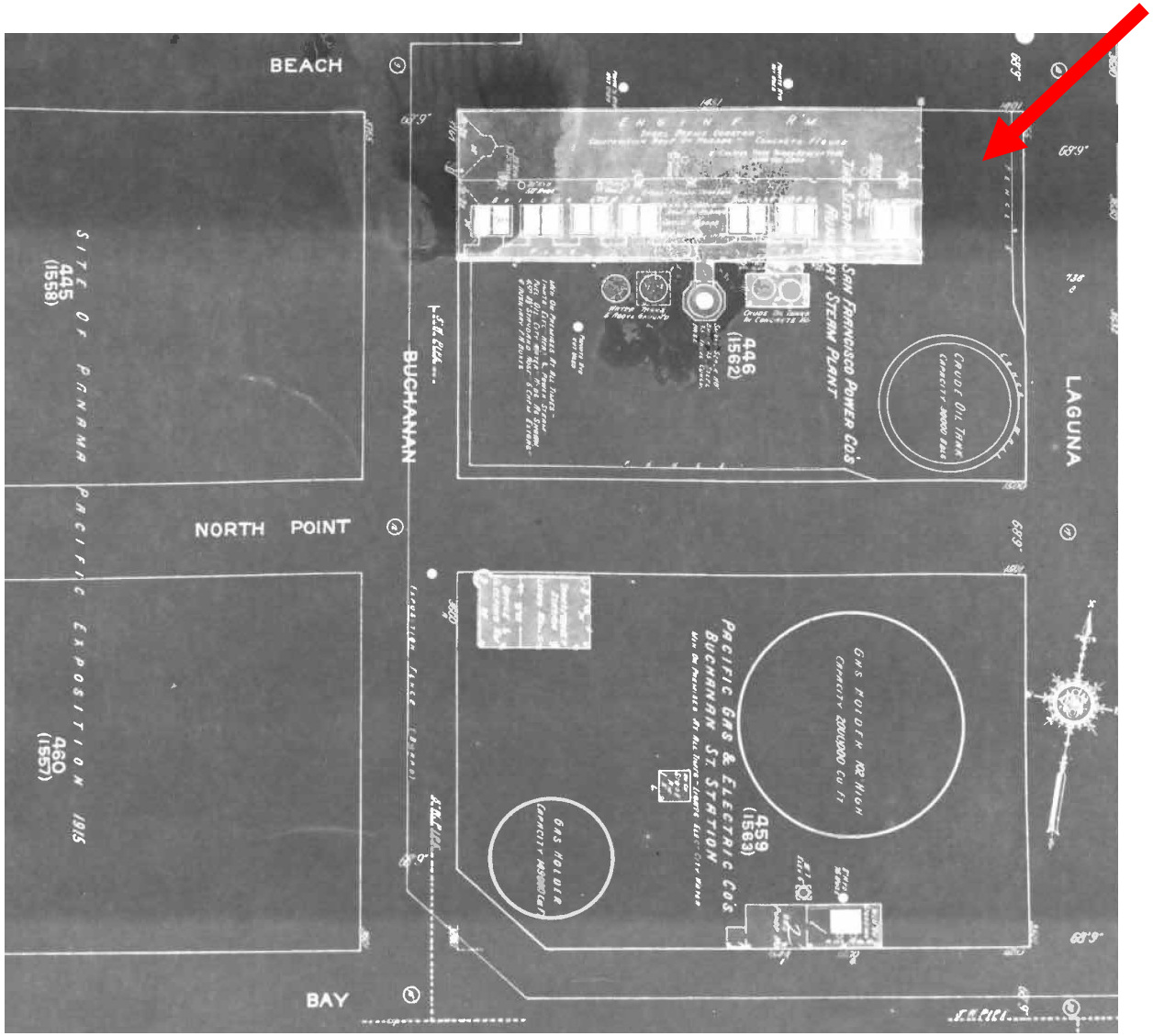

Figure 8: 1919 Sanborn Fire Insurance Map. Detail Vol 3 Sheet 245.
Source: San Francisco Planning Department.

Marina Safeway – 11 and 15 Marina Boulevard, San Francisco, Ca
Site Chronology

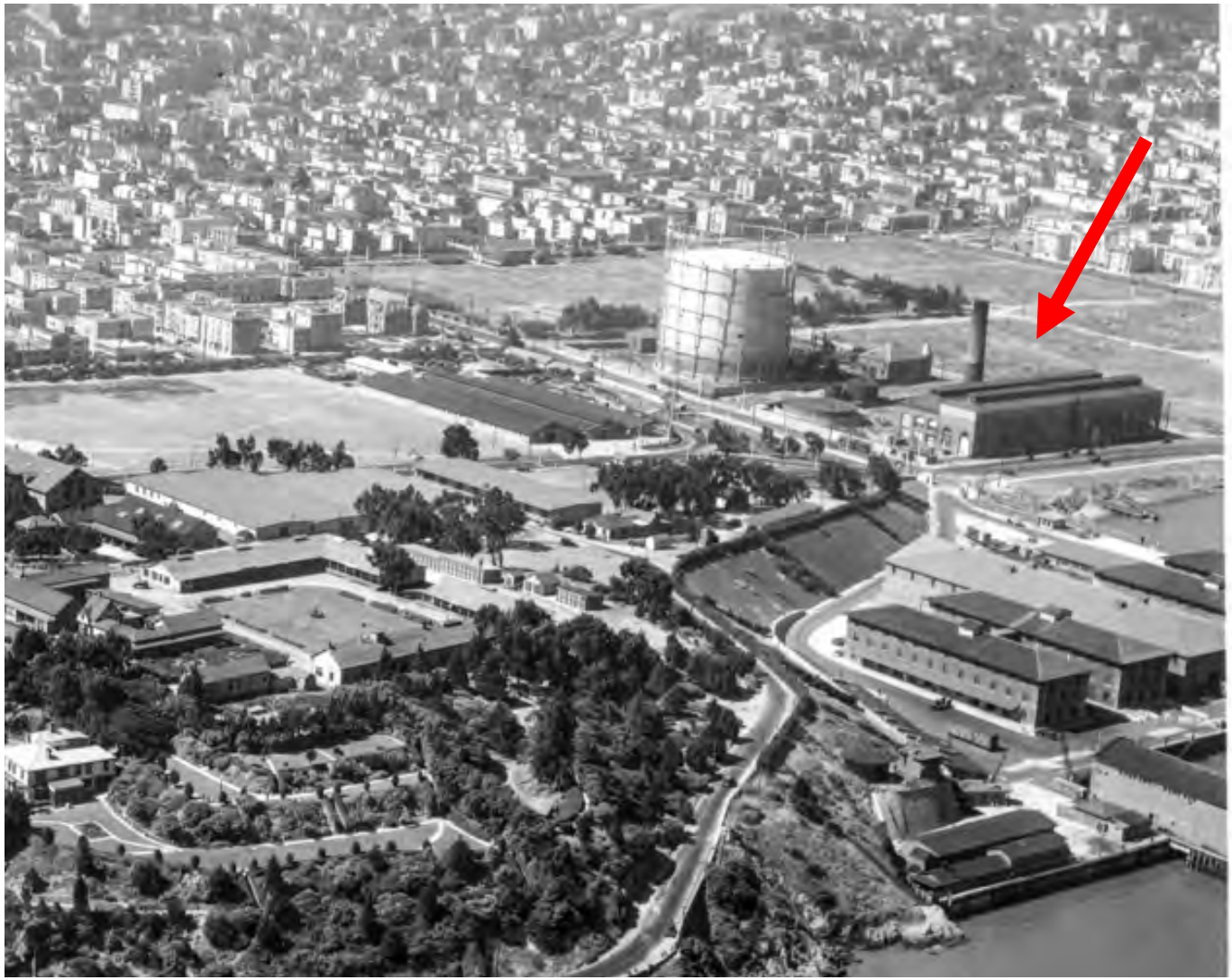

Figure 9: July 12, 1927. Aerial Map, detail. Illustrates tank on site. Source: OpenSFHistory.org.

Marina Safeway – 11 and 15 Marina Boulevard, San Francisco, Ca
Site Chronology

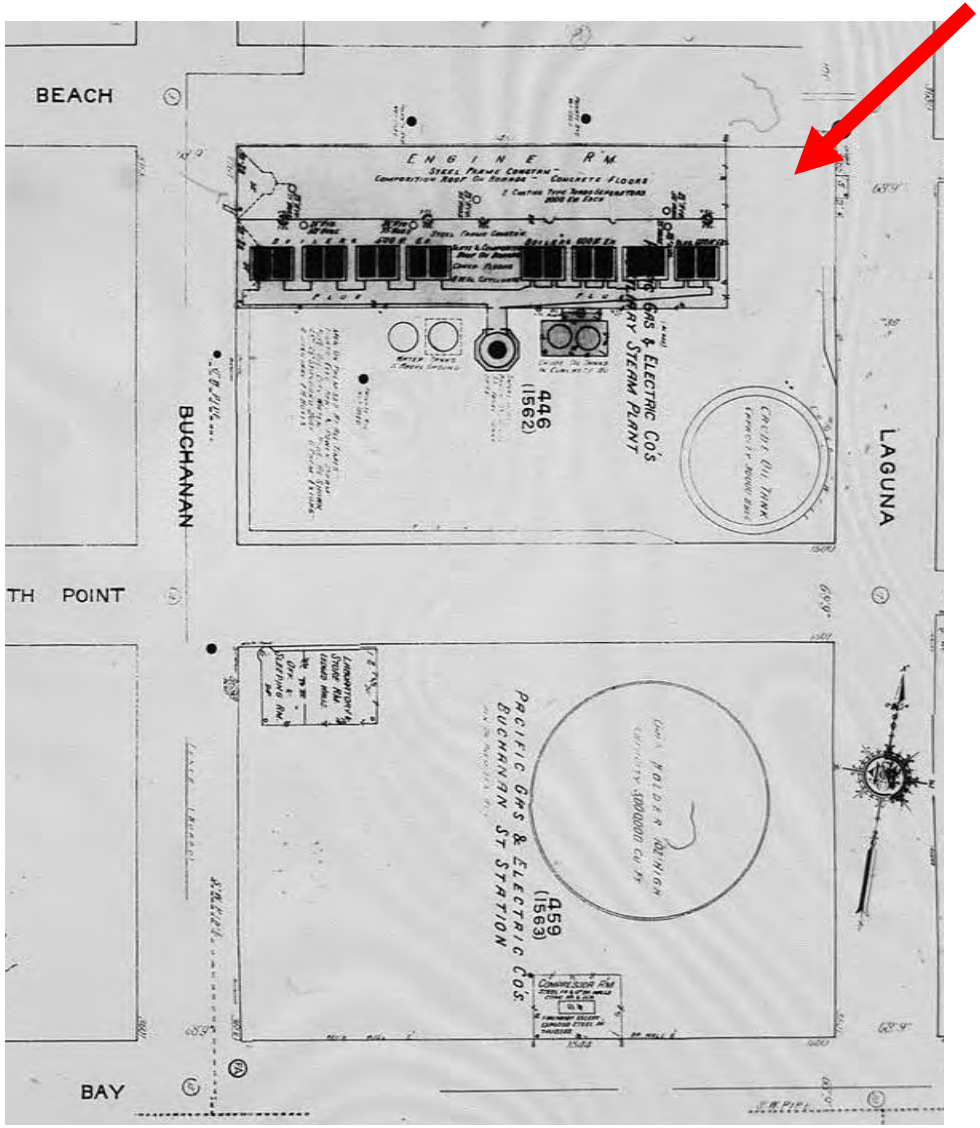

Figure 10: 1929 Sanborn Fire Insurance Map. Detail Vol 3 Sheet 245. Continues to show multiple oil tanks on the site. Source: SFPL FIMO

Marina Safeway – 11 and 15 Marina Boulevard, San Francisco, Ca
Site Chronology

Figure 11: May 27, 1929, Detail view looking southeast. Source: SFPL History Center AAB-9432.

Marina Safeway – 11 and 15 Marina Boulevard, San Francisco, Ca
Site Chronology

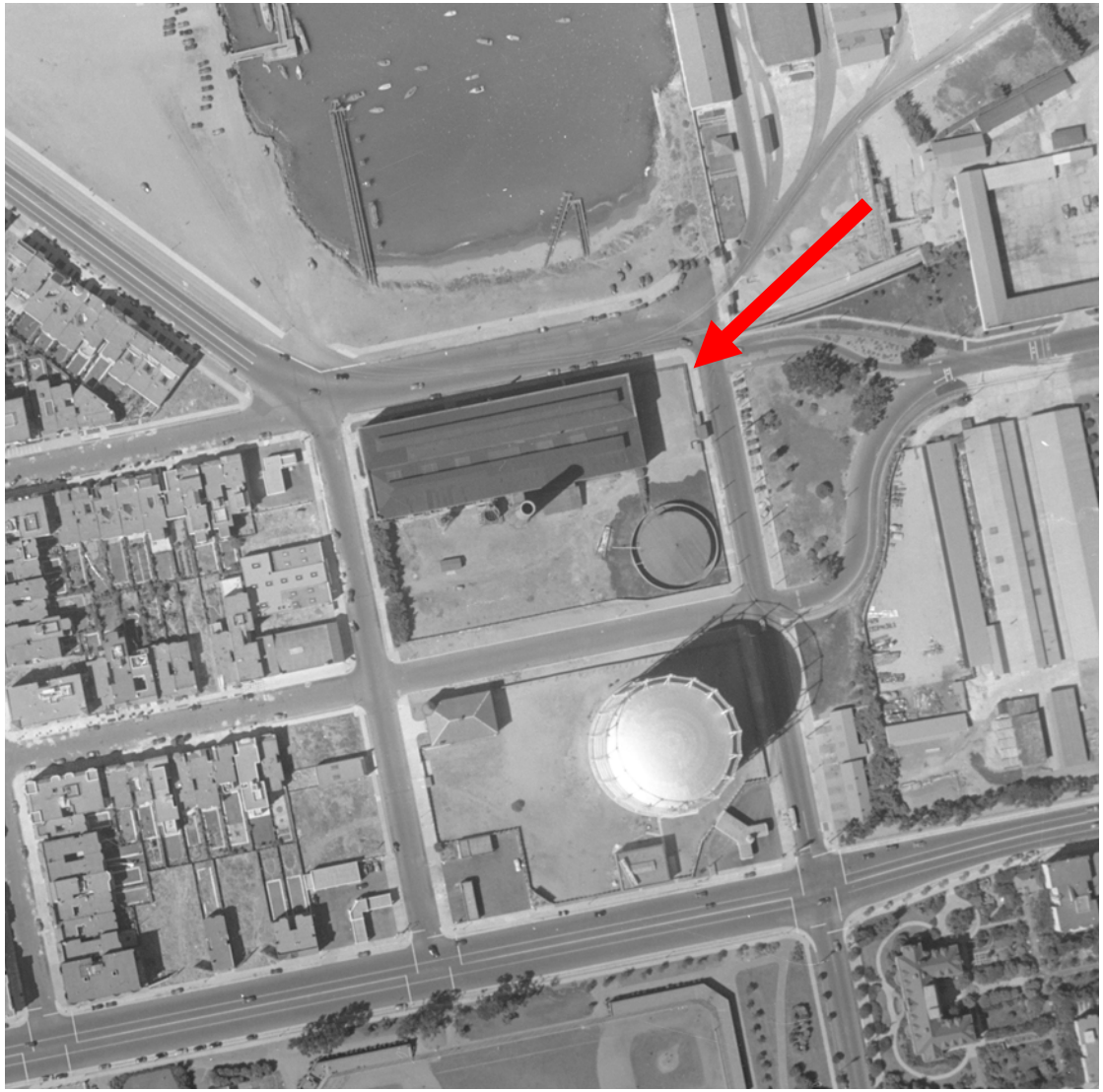

Figure 12: 1938 Aerial Photograph Harrison Ryker, Continues to show multiple oil tanks on the site. Source: David Rumsey Maps.

Marina Safeway – 11 and 15 Marina Boulevard, San Francisco, Ca
Site Chronology

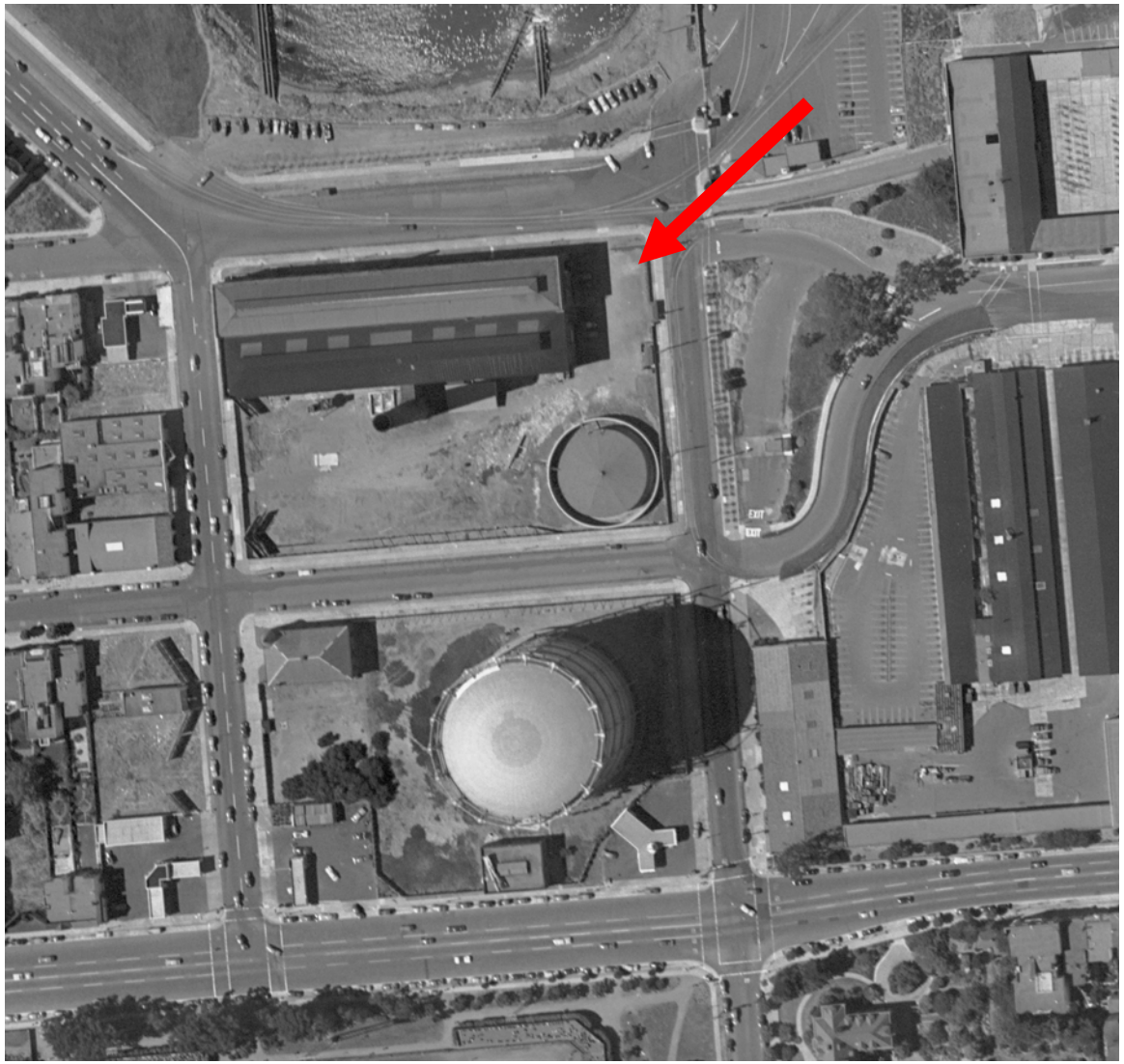

Figure 13: 1948 Aerial Photograph Harrison Ryker, Continues to show multiple oil tanks on the site. Source: David Rumsey Maps.

Marina Safeway – 11 and 15 Marina Boulevard, San Francisco, Ca
Site Chronology

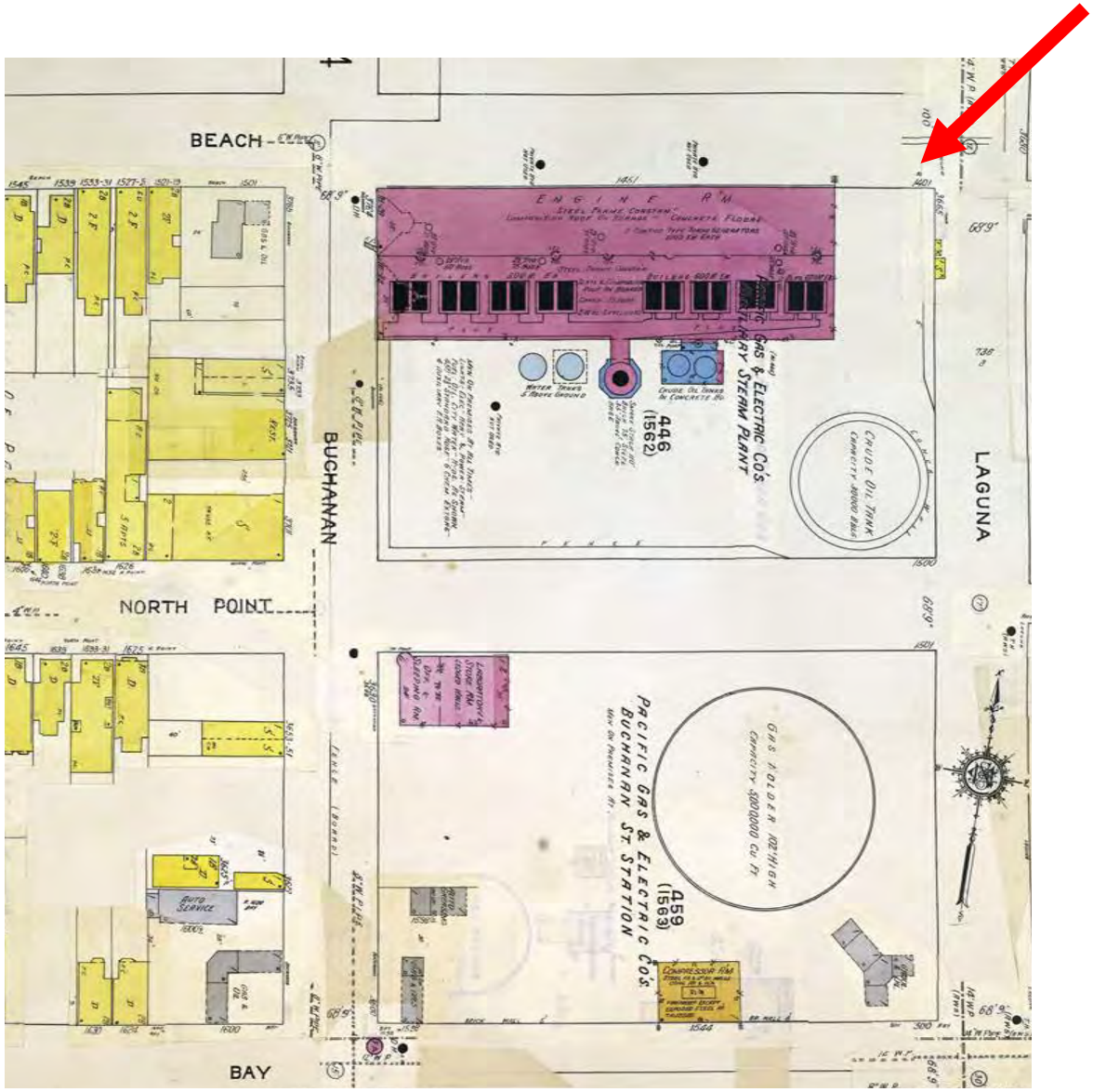

Figure 14: 1950 Sanborn Fire Insurance Map. Detail Vol 3 Sheet 245. Continues to show multiple oil tanks on the site. Source: SFPL FIMO.

Marina Safeway – 11 and 15 Marina Boulevard, San Francisco, Ca
Site Chronology

Figure 15: Aerial March 31, 1953, Looking North. Shows oil tank at 11 Marina Blvd parcel. Source: SFPL History Center AAC-2195.

Marina Safeway – 11 and 15 Marina Boulevard, San Francisco, Ca
Site Chronology

Figure 16: Aerial 1954, Looking North. Shows oil tank at 11 Marina Blvd parcel. Source: GGNRA. Park Archives, GOGA 2316-77-C0380

Marina Safeway – 11 and 15 Marina Boulevard, San Francisco, Ca
Site Chronology

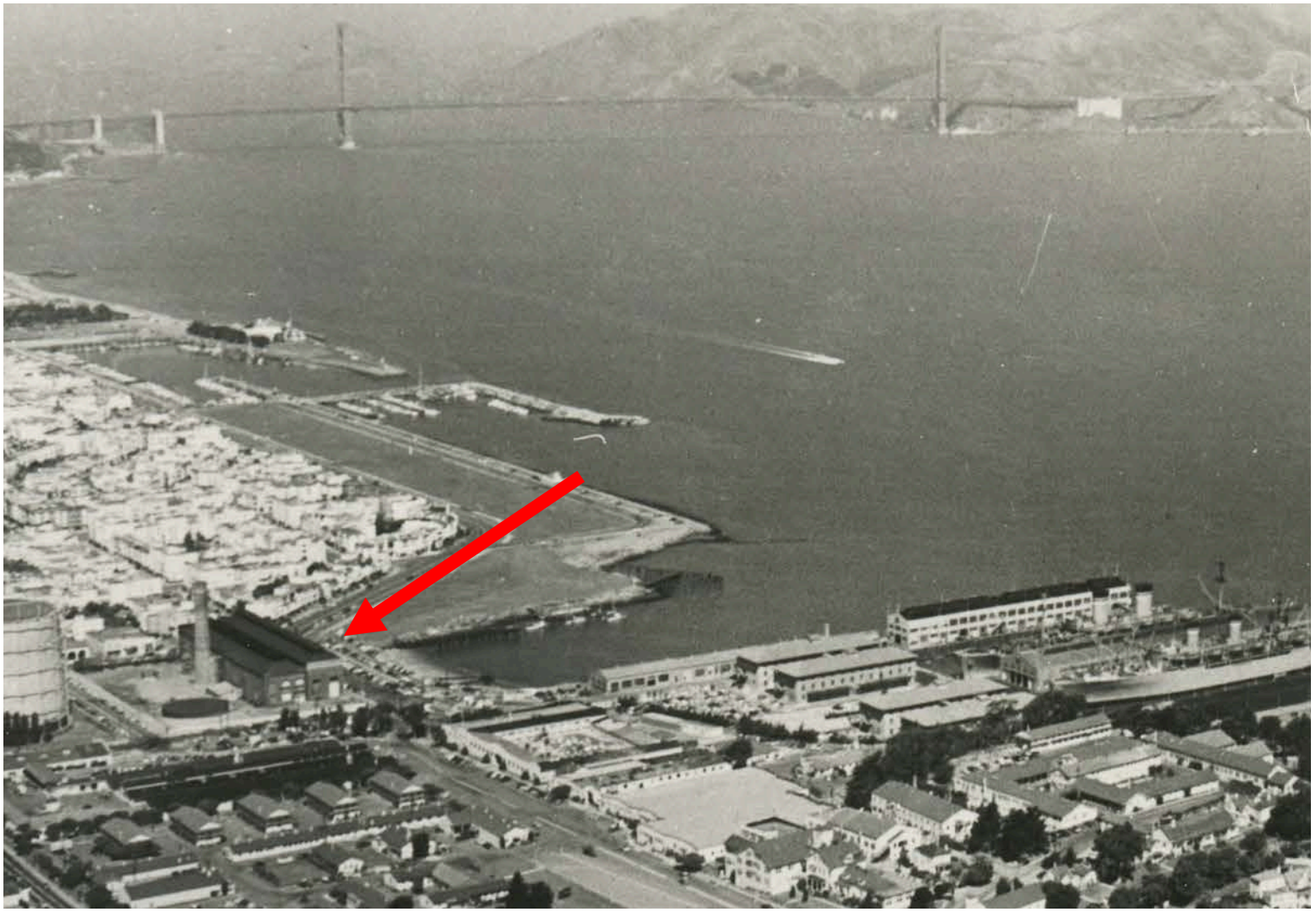

Figure 17: Detail, Aerial 1954, Looking North, Shows tank present on site.
Source: GGNRA. Park Archives, GOGA 38794-22

Marina Safeway – 11 and 15 Marina Boulevard, San Francisco, Ca
Site Chronology

Figure 18: June 25, 1959 Completed Safeway and parking. Source: SFPL History Center

Marina Safeway – 11 and 15 Marina Boulevard, San Francisco, Ca
Site Chronology

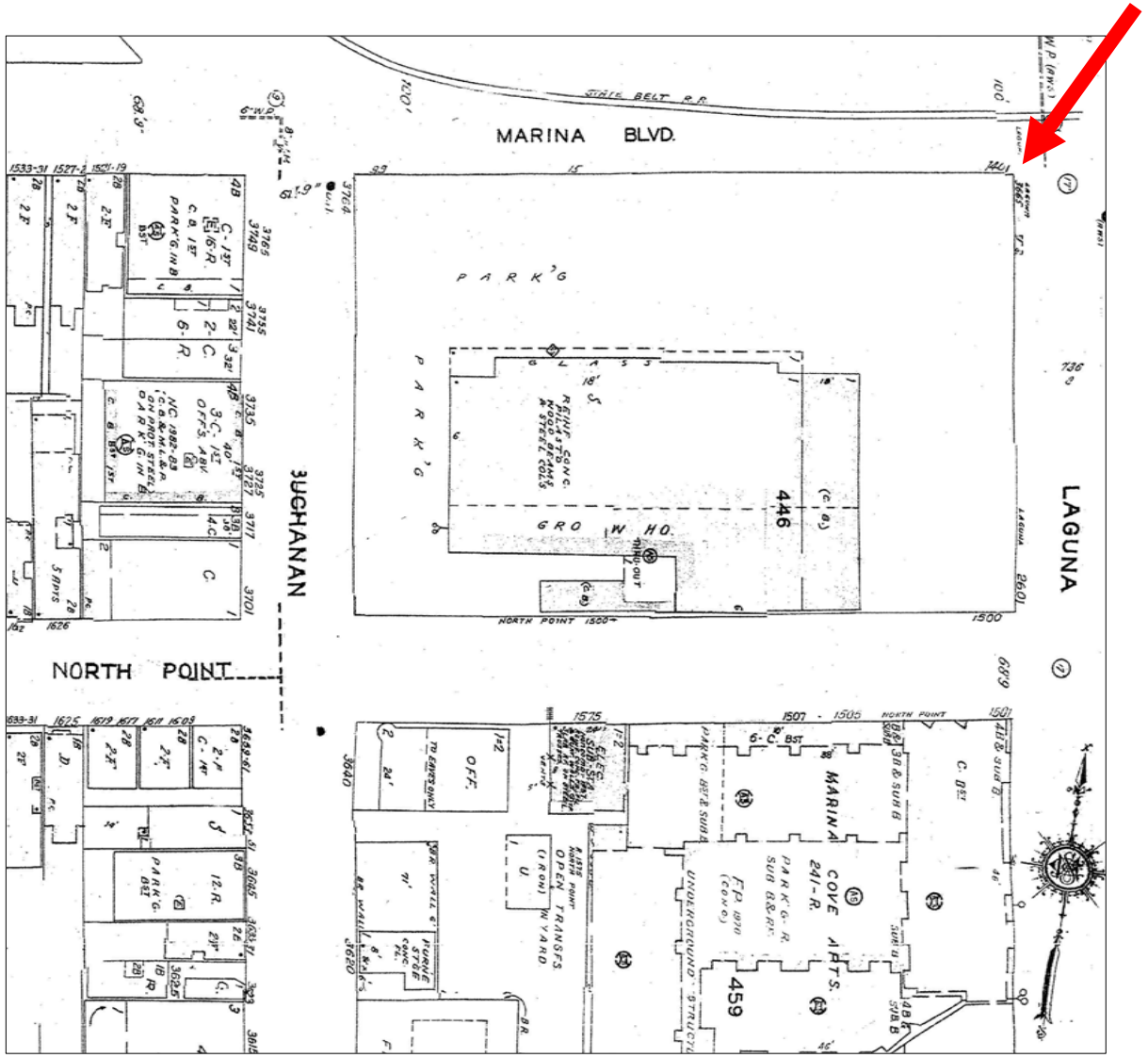

Figure 19: 1990 Sanborn Fire Insurance Map. Detail Vol 3 Sheet 245. Ilustrates Marina Safeway building and parking on the site. Source: San Francisco Planning Department.

EXHIBIT C

San Francisco Bay Regional Water Quality Control Board

November 27, 2024
GeoTracker ID: T10000017511

Pacific Gas and Electric Company (PG&E)
Environmental Remediation Department
Attn: Brenda McConathy
300 Lakeside Drive
Oakland, CA 94612-3534
Email: Brenda.McConathy@pge.com

Albertsons
Attn: Dean Frederickson
250 E Parkcenter Blvd
Boise, ID 83706
Email: Dean.Frederickson@albertsons.com

Subject: No Further Action, San Francisco Marina Safeway, 15 Marina Boulevard, San Francisco, San Francisco County

Dear Brenda McConathy and Dean Frederickson:

This letter confirms the completion of site investigation for the pollutant releases at the subject site. The attached Case Closure Summary describes our case-closure rationale.

Based upon the available information, including the current land use, and with the provision that the information provided to this agency was accurate and representative of site conditions, no further action (NFA) related to the pollutant releases at the subject site is required at this time.

Basis and Assumptions

This NFA status applies only to releases of petroleum hydrocarbons associated with historical site use (storage of crude oil for steam electric power plant). While the information provided indicates the subject site is satisfactorily cleaned up to standards consistent with intended commercial/industrial land use, we may reconsider these findings should land use change, the configuration of site features change, or new information be discovered regarding previously undetected contamination.

This NFA assumes that shallow groundwater beneath the site is not suitable for drinking water or other potential uses, such as landscape and garden irrigation, and will not be used without further assessment and mitigation of potential risks.

Land Use Controls/Covenants

This NFA status does not require a land use controls/covenant or deed restriction to secure the conditions and requirements presented below.

Conditions and Requirements

To ensure protection of public health, safety, or the environment, and to be consistent with the land and groundwater use assumptions above, the following conditions/requirements apply:

- San Francisco Department of Public Health Notification – Maher Ordinance: the Site is within the expanded Maher zone and subject to requirements of the City and County of San Francisco Maher Ordinance. This requires site assessment if more than 50 cubic yards of soil will be disturbed during construction. The objective of Maher investigation and mitigation tasks is to ensure that hazardous materials encountered during excavation or present at properties, if any, are properly managed.

- Regional Water Board Notification – Land/Groundwater Use Change: The Regional Water Board must be notified of any proposed changes in future land use or groundwater use at the site. Formal Regional Water Board concurrence may be required.

- Site Management Plan: On August 28, 2024, the Regional Water Board concurred with the August 14, 2024, Site Management Plan (SMP) prepared for the subject site. The Site Management Plan shall be followed for future site work that involves the handling of soil or otherwise involves subsurface disturbance or repairs. The plan describes the environmental conditions (i.e. contamination left-in-place) and required procedures and notifications should contaminated soil or buried features (e.g., pipes) be encountered during any subsurface activities. If there are any questions, please contact the Regional Water Board.

Closing

The Regional Water Board may require a separate cost recovery agreement for regulatory oversight with the future landowner to evaluate conditions or to review any proposed change in land use, site configuration, or groundwater use.

If you have any questions, please contact Jacob T. Henry of my staff at 510.622.2408 or via email at jacob.henry@waterboards.ca.gov.

Sincerely,

Eileen M. White, P.E.
Executive Officer

Attachment:
Case Closure Summary

Copy:
Gina Withy, PG&E contract project manager, gina.withy@arcadis.com
Jane Anderson, Albertsons, jane.anderson@albertsons.com

CASE CLOSURE SUMMARY

I. AGENCY INFORMATION

Preparation Date: November 27, 2024

Agency Name: San Francisco Bay Regional Water Quality Control Board	Address: 1515 Clay Street, Suite 1400
City/State/Zip: Oakland, CA 94612	Phone: 510-622-2300
Responsible Staff Person: Jacob T. Henry, P.G.	Title: Engineering Geologist

II. SITE INFORMATION

Site Facility Name: San Francisco Marina Safeway		
Site Facility Address: 15 Marina Boulevard, San Francisco CA 94123		
Regional Water Board Case No.: GeoTracker ID T10000017511	Local Case No.: Not applicable	Priority: Not applicable
Responsible Parties (include addresses and phone numbers)		
Former Owner/Operator: Pacific Gas and Electric Company, 300 Lakeside Drive, Oakland, CA 94612. Attn: Brenda McConathy, Brenda.McConathy@pge.com, 916-201-8571		
Property Owner: Albertsons, 250 E Parkcenter Boulevard, Boise, ID 83706. Attn: Dean Frederickson, Dean.Frederickson@albertsons.com, 208-571-1486		

Above-Ground Tank No.	Size in Gallons	Contents	Closed In—Place/Removed?	Date
1	16,000	Crude oil	Removed	By 1956
2	16,000	Crude oil	Removed	By 1956
3	1,260,000 (30,000 barrels)	Crude oil	Removed	By 1956

III. RELEASE AND SITE CHARACTERIZATION INFORMATION

Cause and Type of Release: Unknown. Potential releases during operation or during dismantling of the former steam electric plant with three above ground storage tanks containing petroleum crude oil.	
Site characterization complete?	Date Approved by Oversight Agency:

Yes	January 2, 2024	
Monitoring wells installed? No	Number: Not applicable	Proper screened interval? Not applicable
Highest GW Depth Below Ground Surface: 11.1 feet	Lowest Depth: 17 feet bgs	Flow Direction: North, towards San Francisco Bay
Most Sensitive Current Use: Commercial (grocery store)		
Most Sensitive Potential Use: Residential and Probability of Use: Low. Property is zoned commercial		
Are drinking water wells affected? No	Aquifer Name: Marina	
Is surface water affected? No	Nearest surface water name: San Francisco Bay	
Offsite Beneficial Use Impacts (Addresses/Locations): Not applicable		
Report(s) on file? Yes	Where is report(s) filed? GeoTracker ID T10000017511	

Treatment and Disposal of Affected Material

Material	Amount (Include Units)	Action (Treatment or Disposal w/Destination)	Date
Remediation was neither required nor performed.			

Maximum Documented Pollutant Concentrations For Key Constituents

POLLUTANT	Soil (mg/kg)	Water (µg/L)	Soil Vapor (µg/m^3)
Benzene	ND	ND	1.4
Ethylbenzene	ND	ND	4.0
Naphthalene	26	ND	4.8
Benzo[a]pyrene	77	n/a	n/a
Petroleum-Gasoline	ND	66	18
Petroleum-Diesel	2,500	450	n/a
Petroleum-Motor Oil	5,600	2,000*	n/a

Petroleum Hydrocarbon Oxidation Products (HOPs)**	n/a	28 to 918	n/a

Comments:
n/a – not applicable or not analyzed
ND – non-detect
* – This result likely indicates that contaminated soil was mixed in the sample during the process of collecting groundwater from a soil boring. Therefore, the concentration is biased high.
** – HOPs concentration range was estimated per the 2019 ESL User's Guide (see section 4.5.3) for both TPHd and TPHmo. Then, the results for TPHd and TPHmo were added together to provide broader representation of the HOPs present. Additionally, reporting or detection limits for non-detect results were halved and included in the HOPs calculation.

IV. CLOSURE

Does completed corrective action protect existing beneficial uses per the Regional Board Basin Plan? Not applicable. Existing beneficial uses are protected.

Does completed corrective action protect potential beneficial uses per the Regional Board Basin Plan? Not applicable. Potential beneficial uses are protected.

Does corrective action protect public health for current land use? Not applicable. There are no unacceptable public health risks for the current land use

Risk Management Measures, Conditions and Requirements:

This NFA status does not require a land use controls/covenant or deed restriction to secure the conditions and requirements presented below. However, given the presence of residual petroleum-related pollutants in soil and groundwater, to ensure protection of public health, safety, or the environment, and to be consistent with the land and groundwater use assumptions in the related "No Further Action" letter the following conditions/requirements apply:

- San Francisco Department of Public Health Notification – Maher Ordinance: the Site is within the expanded Maher zone and subject to requirements of the City and County of San Francisco Maher Ordinance. This requires site assessment if more than 50 cubic yards of soil will be disturbed during construction. The objective of Maher investigation and mitigation tasks is to ensure that hazardous materials encountered during excavation or present at properties, if any, are properly managed.

- Regional Water Board Notification – Land/Groundwater Use Change: The Regional Water Board must be notified of any proposed changes in future land use or groundwater use at the site. Formal Regional Water Board concurrence may be required.

• Site Management Plan: On August 28, 2024, the Regional Water Board concurred with the August 14, 2024, Site Management Plan (SMP) prepared for the subject site. The Site Management Plan shall be followed for future site work that involves the handling of soil or otherwise involves subsurface disturbance or repairs. The plan describes the environmental conditions (i.e., contamination left-in-place) and required procedures and notifications should contaminated soil or buried features (e.g., pipes) be encountered during any subsurface activities. If there are any questions, please contact the Regional Water Board.		
Monitoring Wells Decommissioned: Not applicable	Number Decommissioned: Not applicable	Number Retained: Not applicable
List Enforcement Actions Taken: Water Code Section 13267 Order dated April 12, 2022		
List Enforcement Actions Rescinded: Not applicable		

V. ADDITIONAL COMMENTS, DATA, ETC.

This case meets the criteria in the Regional Water Board's 2009 Assessment Tool for Closure of Low-Threat Chlorinated Solvent Sites (Low-Threat Assessment Tool) as described in Attachment 1 (closure rationale).

VI. TECHNICAL REPORTS, CORRESPONDENCE, ETC., THAT THIS CLOSURE RECOMMENDATION WAS BASED UPON

Report	Issuance Date
Site Characterization Investigation Work Plan (includes Site History Report in Appendix A)	10/28/2022
Report on Site Characterization Investigation Report	11/03/2023
Results of Indoor Air Sampling	5/17/2024
Site Management Plan	8/14/2024

This document and the related NO FURTHER ACTION LETTER shall be retained by the lead agency as part of the official site file.

Attachments:

- Attachment 1 Rationale for Closure
- Figure 1 Project Locus
- Figure 2 Investigation Locations
- Figure 3 Soil Analytical Results
- Figure 4 Groundwater Analytical Results

Attachment 1 to the Case Closure Summary: Rationale for Closure
San Francisco Marina Safeway
15 Marina Boulevard
San Francisco

Site Description

The San Francisco Marina Safeway (Site) occupies the property bound by Marina Boulevard, Laguna Street, North Point Street, and Buchanan Street and partially overlies an area that was previously part of San Francisco Bay's Gashouse Cove before the filling of the northwest portion of the Site began in the latter half of the 1800s. The Site was used for industrial purposes beginning in about 1893 by Phelps Manufacturing Company, which made screws, cables, and rail car components using coal-fired furnaces and boilers. In about 1900, the Site was cleared, and a steam electric plant was constructed. The steam electric plant was operated until 1942. During the course of operations, Pacific Gas and Electric Company first leased and later acquired the plant. In 1956, the former plant was dismantled, and the Site was redeveloped into a grocery store that continues to operate.

This case meets the criteria in the San Franciso Bay Regional Water Quality Control Board's (Regional Water Board's) 2009 Assessment Tool for Closure of Low-Threat Chlorinated Solvent Sites (Low-Threat Assessment Tool) as described herein.

Criterion 1a (Pollutant sources are identified and evaluated)

The primary sources—three above ground storage tanks (AST) containing petroleum crude oil—were removed by 1956. The chemicals of potential concern (COPCs) are petroleum hydrocarbons, primarily total petroleum hydrocarbons (TPH) in the motor oil range (TPHmo; C24-C36) and some TPH as diesel (TPHd; C10-C24). The primary contaminated media are soil and to a lesser extent groundwater. Soil vapor is not significantly impacted. The COPCs are consistent with the former steam electric plant operations, which were powered using crude oil.

Criterion 1b (The site is adequately characterized)

The nature, distribution, and extent of contamination in subsurface media (soil, soil vapor, and groundwater) have been adequately characterized. The distribution and magnitude of detected COPCs is consistent with the past use. Since no significant soil vapor impacts were encountered, a summary of the soil and groundwater impacts is presented below.

- Soil – There are two areas of petroleum-contaminated soil at the Site. The first area is around the former 1,260,000-gallon AST in the southeastern portion of the Site (borings SWB-01, SWB-02, SWB-03, and former location TG-28). TPHmo-contaminated soil is present at depths of approximately 5 feet below ground surface. The second area is in the northwestern portion of the Site, near the former boiler and engine rooms with TPHmo at similar depths along with

some TPHd-contaminated soil at boring location SWB-06B. The only exceedance of the Commercial/Industrial Direct Exposure Soil Environmental Screening Level (ESL) is in a 5.5-foot depth sample at SWB-06B.

- Groundwater – Groundwater contamination is limited to the area near the former 1,260,000-gallon AST, at borings SWB-01 and SWB-03. The TPHd and TPHmo results with and without silica gel cleanup (SGC) were reviewed along with the chromatograms. The detections of TPHd and TPHmo after SGC at these borings indicate that the materials detected are hydrocarbons. This result likely indicates that contaminated soil was mixed in the sample during the process of collecting groundwater from a soil boring. Therefore, the concentration is biased high. The TPHd concentrations were detected up to 450 μg/L, which is below the TPHd Aquatic Habitat ESL of 640 ug/L, the most relevant exposure pathway. Review of the chromatograms for TPHd and TPHmo after SGC indicate that petroleum hydrocarbon oxidation products (HOPs) are present. The HOPs concentration range was estimated per the 2019 ESL User's Guide (see section 4.5.3) for both TPHd and TPHmo. Then, the results for TPHd and TPHmo were added together to provide broader representation of the HOPs present. Additionally, reporting or detection limits for non-detect results were halved and included in the HOPs calculation. The estimated concentration at SWB-03 is 918 μg/L, which is approximately twice the HOPs Aquatic Habitat ESL of 510 μg/L. However, the presence of HOPs is an indication biodegradation is occurring. Coupled with no threat of a release to the Bay means there is no to very low risk.

Criterion 1c (Exposure pathways, receptors, and potential risks, threats, and other environmental concerns are identified and assessed)

Based on available soil vapor data, residual COPCs do not present a significant soil vapor intrusion risk. The relevant exposure pathways for soil are direct contact for commercial workers and construction/maintenance workers for situations where there is subsurface work. The relevant exposure pathway for groundwater is potential discharge to the Bay (aquatic habitat). Although groundwater concentrations are above the Aquatic Habitat ESLs, the contamination is isolated and not migrating to the Bay where exposure could occur. Drinking water exposures are unlikely given that there is supplied municipal drinking water and that shallow groundwater conditions in the area meets the beneficial use exception criteria in State Water Resources Control Board Resolution No. 88-63 and Regional Water Board Resolution No. 89-39 as described in the Regional Water Board July 14, 2023, letter.

Criterion 2a (Pollutant sources are remediated to the extent feasible)

The residual COPC concentration strengths are low, such that source remediation is not warranted.

Criterion 2b (Unacceptable risks to human health, ecological health, and sensitive receptors, considering current and future land and water uses, are mitigated)

There are no unacceptable risks to human or ecological (i.e., aquatic habitat) receptors considering the current and reasonably foreseeable future land and water uses. Though there are exceedances of the appropriate soil and groundwater ESLs, the exceedances are isolated and exposure is unlikely to occur. Moreover, the concentrations likely will decline over time due to biodegradation, which will improve water quality.

Sea level rise (SLR) and groundwater rise (GWR) are not a concern for this site given the low residual mass in soil and groundwater. However, a more in-depth assessment of SLR and GWR was completed to be consistent with standard practices employed by the Regional Water Board.

The Regional Water Board relied on two documents to assess potential risks due to SLR: State Agency Sea Level Rise Action Plan for California (February 2024) (Action Plan) and State of California Sea Level Rise Guidance (June 2024) (SLR Guidance). The Action Plan advocates for the assessment of five potential sea level rise scenarios (low, intermediate-low, intermediate, intermediate-high, and high), which are dependent on the nearest tide gauge and a range of years up to 2150. Application of the SLR Guidance should account for variability in the prediction models and ensure resiliency of existing infrastructure (including remedial), buildings, and remaining contamination. Regional Water Board staff evaluated the potential adverse effects from an intermediate, intermediate-high, and high SLR scenario using the San Francisco tide gauge. This assessment included the potential for flooding and erosion due to SLR that could expose the residual contamination and the increased potential for contaminant dissolution, mobilization, and soil vapor generation due to GWR rise.

Based on the recommendation in the Action Plan and the SLR Guidance, along with publicly available sea level rise interactive models from Our Coast Our Future (OCOF) and Adapting To Rising Tides (ART), Regional Water Board staff conducted the assessment to determine if SLR and GWR would present an unacceptable risk to human health or the environment. Based on the assessment and the continued attenuation of remaining impacts, it is reasonable to assume remaining impacts will continue to present a low risk as per the Low-Threat Assessment Tool if SLR reaches 6.5 feet by 2100.

Below are the key findings from the assessment:

Intermediate to High SLR of 0.8 to 1.3 Feet by 2050: The OCOF and ART models were set to the closest available SLR scenarios that represent a SLR of 0.8 feet, 1.0 feet, and 1.3 feet. Both models show no flooding will occur at the Site. The OCOF model also accounts for potential GWR and even with a SLR of 1.6 feet (closest to 1.3 feet predicted), groundwater would be expected at approximately similar levels currently measured (7 to 11 feet deep) at the Site.

Intermediate to High SLR of 3.1 to 6.5 Feet by 2100: The OCOF and ART models were set to the closest available SLR scenarios that represent a SLR of 3.1 feet, 4.8 feet, and 6.5 feet. Both models show no flooding will occur at the Site. The OCOF model also accounts for potential GWR and even with a SLR of 6.6 feet (closest to 6.5 feet predicted), groundwater would be expected at a depth of less than 1 foot to over 16 feet at the Site.

Criterion 2c (Unacceptable threats to groundwater and surface water resources, considering existing and potential beneficial uses, are mitigated)

There are no significant threats to groundwater or surface water resources (see Criteria 1c and 2b).

Criterion 3a (Groundwater plumes are decreasing)

The groundwater plume is limited in areal extent and predominantly consists of HOPs, which are an indicator of the breakdown of petroleum hydrocarbons. Water quality is expected to improve over time.

Criterion 3b (Cleanup standards can be met within a reasonable timeframe)

No cleanup is required. See also Criteria 2a, 2b, and 3b.

Criterion 3c (Risk management measures are appropriate, documented, and do not require future Water Board oversight)

This NFA status does not require a land use controls/covenant or deed restriction to secure the conditions and requirements presented below. However, given the presence of residual petroleum-related pollutants in soil and groundwater, to ensure protection of public health, safety, or the environment, and to be consistent with the land and groundwater use assumptions in the related “No Further Action” letter the following conditions/requirements apply:

- San Francisco Department of Public Health Notification – Maher Ordinance: the Site is within the expanded Maher zone and subject to requirements of the City and County of San Francisco Maher Ordinance. This requires site assessment if more than 50 cubic yards of soil will be disturbed during construction. The objective of Maher investigation and mitigation tasks is to ensure that hazardous materials encountered during excavation or present at properties, if any, are properly managed.

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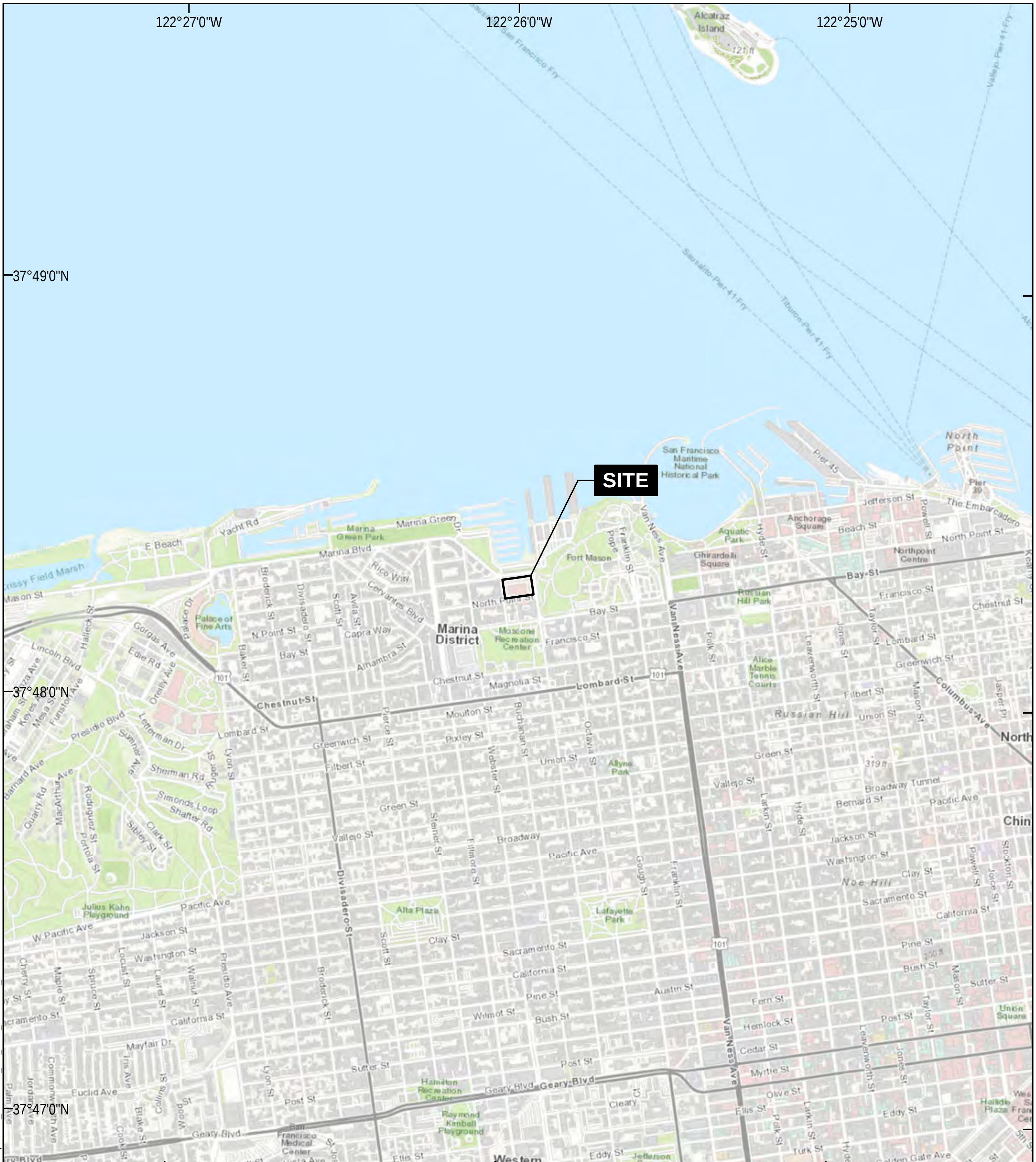


MAP SOURCE: ESRI
SITE COORDINATES: 37°48'17"N, 122°25'58"W

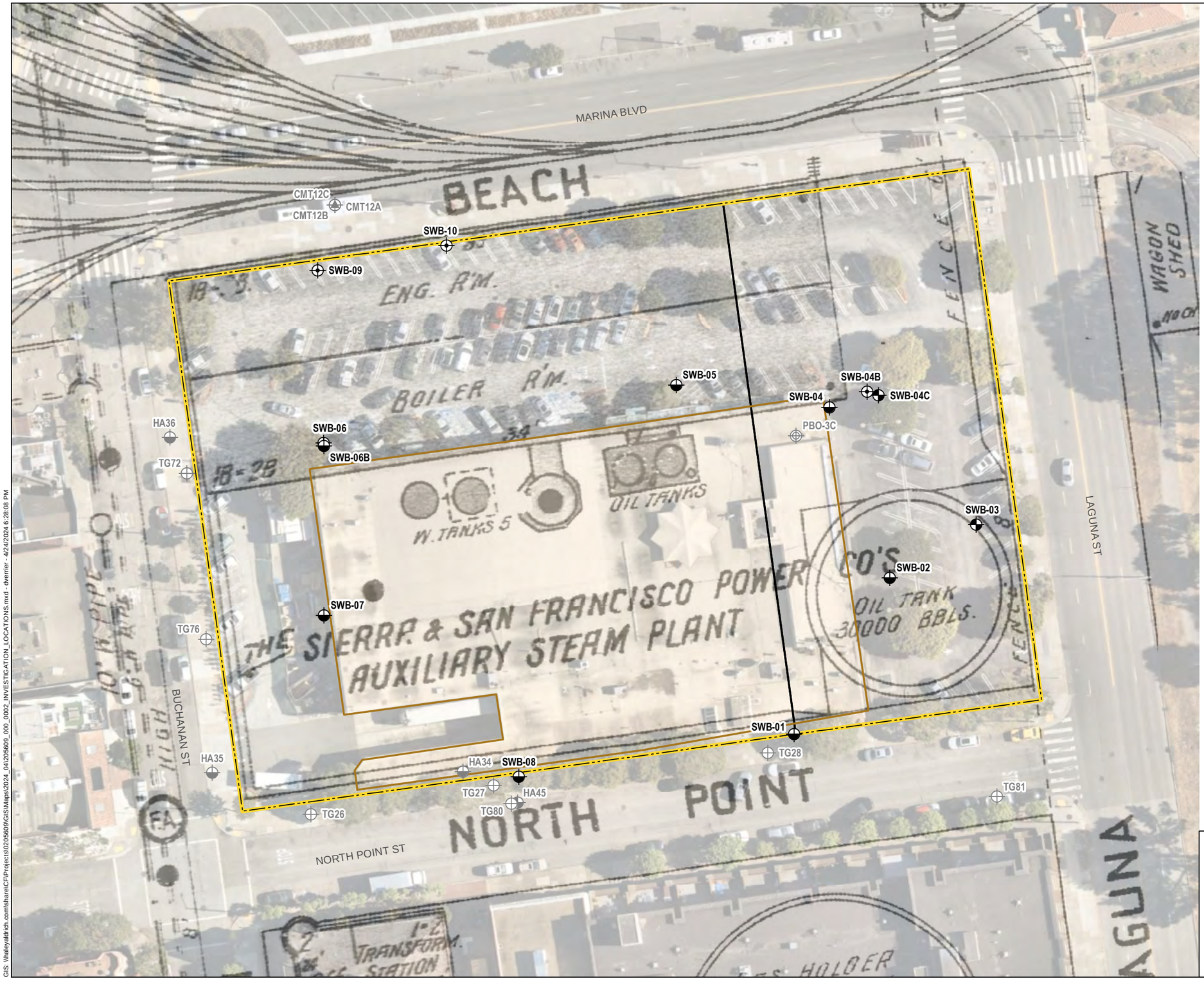
PACIFIC GAS AND ELECTRIC COMPANY (PG&E)
15 MARINA BOULEVARD
SAN FRANCISCO, CALIFORNIA

PROJECT LOCUS

APPROXIMATE SCALE: 1 IN = 2000 FT
AUGUST 2024

FIGURE 1

GIS: \\haleyaldrich.com\share\CF\Projects\0205609\GIS\Maps\2024_04\205609_000_0001_PROJECT_LOCUS.mxd - dverrier - 4/24/2024 6:27:04 PM



LEGEND

- SOIL BORING AND GRAB GROUNDWATER
- SOIL BORING
- SOIL BORING, GRAB GROUNDWATER, AND/OR SOIL VAPOR PROBE

PREVIOUS EXPLORATION

- SOIL BORING
- SOIL BORING AND SOIL VAPOR PROBE
- MONITORING WELL
- TARGOST
- GEOTECH SOIL BORING
- EXISTING BUILDING FOOTPRINT
- SITE BOUNDARY
- PARCEL BOUNDARY

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.

2. A REVIEW OF PREVIOUS INVESTIGATION LOCATION DATA INDICATED THAT THE ACTUAL LOCATIONS OF TG80 AND HA45 DID NOT MATCH THE LOCATIONS PRESENTED IN PREVIOUS REPORTS. THE LOCATION DATA FOR TG80 AND HA45 HAS BEEN UPDATED BASED ON THE MOST CURRENT AVAILABLE GPS SURVEY.

3. ASSESSOR PARCEL DATA SOURCE: SAN FRANCISCO COUNTY

4. PREVIOUS EXPLORATION DATA SOURCE: HALEY & ALDRICH

5. PREVIOUS GEOTECH SOIL BORING DATA SOURCE: "GEOTECHNICAL INVESTIGATION, PROPOSED REMODEL OF SAFEWAY STORE #711" PREPARED BY HAZRA CONSULTING ENGINEERS AND SCIENTISTS, 21 MARCH 1995

6. BASE MAP SOURCE: "1915 CERTIFIED SANBORN MAP" PREPARED BY THE SANBORN LIBARY LLC, 30 DECEMBER 2013

7. AERIAL IMAGERY SOURCE: NEARMAP, 18 MAY 2022

N

0 50 100
SCALE IN FEET

HALEY ALDRICH

PACIFIC GAS AND ELECTRIC COMPANY (PG&E)
15 MARINA BOULEVARD
SAN FRANCISCO, CALIFORNIA

INVESTIGATION LOCATIONS

AUGUST 2024

FIGURE 2

G:\S:\haleyaldrich.com\share\CF\Projects\0205609\GIS\Maps\2024_04\205609_000_0002_INVESTIGATION_LOCATIONS.mxd - dverrier - 4/24/2024 6:28:08 PM

SWB-09
04/18/2023

DEPTH(FT)	1.2	5.0	7.1
BENZENE	<0.0044 J	<0.0043 J	<0.0043 J
NAPHTHALENE	<0.0049	2.6	<0.29
TPH-DRO	2.6 J	160 J	160 J
TPH-GRO	<0.44 J	<0.43 J	<0.43 J
TPH-MO	15	770	1,000

SWB-10
04/24/2023

DEPTH(FT)	1.3	5.0
BENZENE	<0.0046	<0.0041
NAPHTHALENE	0.013	0.56
TPH-DRO	8.5	540
TPH-GRO	<0.46	<0.41
TPH-MO	51	1,300

SWB-05
04/26/2023

DEPTH(FT)	1.0	5.0	9.5
BENZENE	<0.0045	<0.0042	<0.0035
NAPHTHALENE	0.038 J	0.13	0.13
TPH-DRO	18 J	43 J	64 J
TPH-GRO	<0.45	<0.42	<0.35
TPH-MO	98	230	390

SWB-04
04/27/2023

DEPTH(FT)	1.0	5.0
BENZENE	<0.0039	<0.0036
NAPHTHALENE	0.0048	0.034
TPH-DRO	3.6 J	8.0 J
TPH-GRO	<0.39	<0.36
TPH-MO	22	52

SWB-04C
05/03/2023

DEPTH(FT)	10.0	13.0
BENZENE	<0.0045	<0.0040
NAPHTHALENE	<0.0046	<0.0049
TPH-DRO	<0.97	<0.98
TPH-GRO	<0.45	<0.40
TPH-MO	<4.9	<4.9

SWB-06B
04/19/2023

DEPTH(FT)	1.5	5.0	5.5
BENZENE	<0.0046 J	<0.0041 J	<0.52 J
NAPHTHALENE	<0.0049	14	**26**
TPH-DRO	<0.99	350 J	**2,500 J**
TPH-GRO	<0.46 J	<0.41 J	<10 J
TPH-MO	<4.9	1,100 J	5,600 J

SWB-03
04/21/2023

DEPTH(FT)	1.3	5.0	10.4	15.0
BENZENE	<0.0040	<0.0041	<0.0036	<0.0037
NAPHTHALENE	0.94	<0.072	<0.049	<0.0048
TPH-DRO	30	150	20	<0.99
TPH-GRO	<0.40	<0.41	<0.36	<0.37
TPH-MO	100	1,500	120	<5.0

SWB-07
04/20/2023

DEPTH(FT)	1.3	5.0	10.0
BENZENE	<0.0044 J	<0.0040	<0.0044
NAPHTHALENE	0.0072	<0.0047	<0.0048
TPH-DRO	4.2	1.2	<1.0
TPH-GRO	<0.44	<0.40	<0.44
TPH-MO	42	13	<5.0

SWB-08
05/02/2023

DEPTH(FT)	2.0
BENZENE	<0.0046
NAPHTHALENE	0.86
TPH-DRO	330 J
TPH-GRO	<0.46
TPH-MO	1,100

SWB-01
04/28/2023

DEPTH(FT)	1.3	5.0	7.0	11.0	15.0
BENZENE	<0.0039	<0.0042	<0.0041	<0.0043	<0.0040
NAPHTHALENE	0.050	0.089	<0.50	<0.24	<0.0047
TPH-DRO	14 J	32 J	290 J	150 J	<0.98
TPH-GRO	<0.39	<0.42	<0.41	<0.43	<0.40
TPH-MO	44	78	1,600	890	<4.9

SWB-02
04/25/2023

DEPTH(FT)	1.0	5.0	8.0	13.7
BENZENE	<0.0044	<0.0046	<0.0040	<0.0035
NAPHTHALENE	<0.29	1.2	<0.070	<0.0049
TPH-DRO	140	230	150	3.9
TPH-GRO	<0.44	<0.46	<0.40	<0.35
TPH-MO	640	1,200	1,200	25

LEGEND

- SOIL BORING AND GRAB GROUNDWATER
- SOIL BORING
- SOIL BORING, GRAB GROUNDWATER, AND/OR SOIL VAPOR PROBE

PREVIOUS EXPLORATION

- SOIL BORING
- SOIL BORING AND SOIL VAPOR PROBE
- MONITORING WELL
- TARGOST
- GEOTECH SOIL BORING
- EXISTING BUILDING FOOTPRINT
- SITE BOUNDARY
- PARCEL BOUNDARY

NOTES
1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. CONCENTRATIONS SHOWN ARE IN MILLIGRAMS PER KILOGRAM (mg/kg).
3. CONCENTRATIONS IN **BOLD TEXT** ARE ABOVE THE SCREENING LEVEL.
4. DEFINITIONS:
TPH-DRO = TOTAL PETROLEUM HYDROCARBONS, DIESEL RANGE
TPH-GRO = TOTAL PETROLEUM HYDROCARBONS, GASOLINE RANGE
TPH-MO = TOTAL PETROLEUM HYDROCARBONS, MOTOR OIL, SILICA GEL CLEANUP
FT = FEET
J = ESTIMATED VALUE
5. A REVIEW OF PREVIOUS INVESTIGATION LOCATION DATA INDICATED THAT THE ACTUAL LOCATIONS OF TG80 AND HA45 DID NOT MATCH THE LOCATIONS PRESENTED IN PREVIOUS REPORTS. THE LOCATION DATA FOR TG80 AND HA45 HAS BEEN UPDATED BASED ON THE MOST CURRENT AVAILABLE GPS SURVEY.
6. ASSESSOR PARCEL DATA SOURCE: SAN FRANCISCO COUNTY
7. PREVIOUS EXPLORATION DATA SOURCE: HALEY & ALDRICH
8. PREVIOUS GEOTECH SOIL BORING DATA SOURCE: "GEOTECHNICAL INVESTIGATION, PROPOSED REMODEL OF SAFEWAY STORE #711" PREPARED BY HAZRA CONSULTING ENGINEERS AND SCIENTISTS, 21 MARCH 1995
9. BASE MAP SOURCE: "1915 CERTIFIED SANBORN MAP" PREPARED BY THE SANBORN LIBARY LLC, 30 DECEMBER 2013
10. AERIAL IMAGERY SOURCE: NEARMAP, 18 MAY 2022

0 50 100
SCALE IN FEET

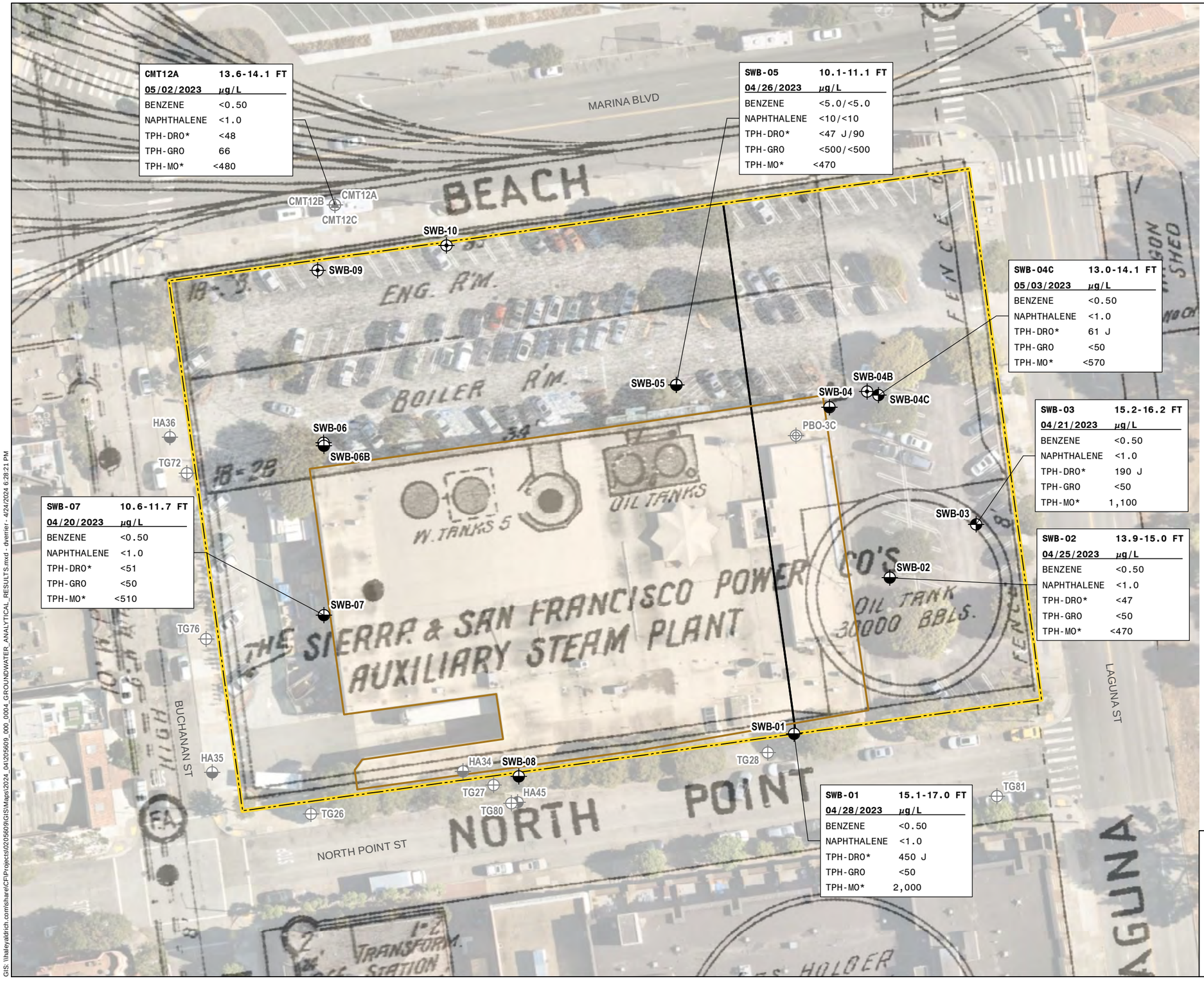
PACIFIC GAS AND ELECTRIC COMPANY (PG&E)
15 MARINA BOULEVARD
SAN FRANCISCO, CALIFORNIA

SOIL ANALYTICAL RESULTS

AUGUST 2024

FIGURE 3

GIS: \\haleyaldrich.com\share\CP\Projects\0205609\GIS\Maps\2024_04\205609_000_0003_SOIL_ANALYTICAL_RESULTS.mxd - dverrier - 4/24/2024 6:28:12 PM



LEGEND

- SOIL BORING AND GRAB GROUNDWATER
- SOIL BORING
- SOIL BORING, GRAB GROUNDWATER, AND/OR SOIL VAPOR PROBE

PREVIOUS EXPLORATION

- SOIL BORING
- SOIL BORING AND SOIL VAPOR PROBE
- MONITORING WELL
- TARGOST
- GEOTECH SOIL BORING
- EXISTING BUILDING FOOTPRINT
- SITE BOUNDARY
- PARCEL BOUNDARY

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. CONCENTRATIONS IN **BOLD TEXT** ARE ABOVE THE SCREENING LEVEL.
3. DEFINITIONS:
TPH-DRO* = TOTAL PETROLEUM HYDROCARBONS, DIESEL RANGE, SILICA GEL CLEANUP
TPH-GRO = TOTAL PETROLEUM HYDROCARBONS, GASOLINE RANGE
TPH-MO* = TOTAL PETROLEUM HYDROCARBONS, MOTOR OIL, SILICA GEL CLEANUP
J = ESTIMATED VALUE
µG/L = MICROGRAMS PER LITER
/ = PRIMARY/DUPLICATE RESULT
4. ASSESSOR PARCEL DATA SOURCE: SAN FRANCISCO COUNTY
5. PREVIOUS EXPLORATION DATA SOURCE: HALEY & ALDRICH
6. A REVIEW OF PREVIOUS INVESTIGATION LOCATION DATA INDICATED THAT THE ACTUAL LOCATIONS OF TG80 AND HA45 DID NOT MATCH THE LOCATIONS PRESENTED IN PREVIOUS REPORTS. THE LOCATION DATA FOR TG80 AND HA45 HAS BEEN UPDATED BASED ON THE MOST CURRENT AVAILABLE GPS SURVEY.
7. PREVIOUS GEOTECH SOIL BORING DATA SOURCE: "GEOTECHNICAL INVESTIGATION, PROPOSED REMODEL OF SAFEWAY STORE #711" PREPARED BY HAZRA CONSULTING ENGINEERS AND SCIENTISTS, 21 MARCH 1995
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9. AERIAL IMAGERY SOURCE: NEARMAP, 18 MAY 2022

0 50 100
SCALE IN FEET

HALEY ALDRICH

PACIFIC GAS AND ELECTRIC COMPANY (PG&E)
15 MARINA BOULEVARD
SAN FRANCISCO, CALIFORNIA

GROUNDWATER ANALYTICAL RESULTS

AUGUST 2024

FIGURE 4

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EXHIBIT D

20 February 2026

Mr. Ryan Casey, PE
Administrative Engineer
San Francisco Department of Public Health
49 South Van Ness Avenue, Suite 600
San Francisco, California 94103

SUBJECT: Phase II Work Plan
11 - 15 Marian Boulevard
San Francisco, California
EHB-SAM Case Number 2361
Langan Project No. 731786102

Dear Mr. Casey,

On behalf of Marina Property Owner, LLC (client), Langan CA, Inc. (Langan) is pleased to present this *Phase II Work Plan* (Work Plan) to perform soil sampling for the proposed new mixed-use development at 11-15 Marina Boulevard, San Francisco, California (site; Figure 1). This Work Plan was prepared to characterize site conditions to satisfy the requirements of the San Francisco Department of Public Health (SFDPH) Environmental Health Branch, Site Assessment and Mitigation Program (EHB-SAM), as part of Maher Ordinance compliance, which requires Subsurface Sampling and Analysis.

Project Description

The site is located at 11-15 Marina Boulevard and is bound by Marina Boulevard to the north, Laguna Street to the east, North Point Street to the south, and Buchanan Street to the west (Figure 1). The site can be accessed from Buchanan Street, Marina Boulevard, or Laguna Street. The site is approximately 2.62-acres and is improved with an approximately 40,212-square-foot (sqft), single-story retail building. The building is located on the southern portion of the site, and the remainder of the site is improved with asphalt-paved parking and vegetation. Langan understands the proposed development includes the demolition of the existing structure and the construction of a multi-story mixed-use building which will include sub-surface parking, a ground-label grocery store, and a residential tower. Excavation depth for the sub-surface parking will be approximately 20 feet below the ground surface (bgs).

Based on previously conducted investigations at the site, soil to approximately 10 feet bgs has been identified as artificial fill based on the presence of anthropogenic material and debris. Soils generally consist of poorly graded sand, with pockets of clayey sand or silty sand to depths of 17 feet bgs. Refusal had been encountered at approximately seven to eight feet bgs at multiple drilling locations due to the presence of a flat concrete surface which is believed to be a former building slab. Groundwater has been encountered at 10 to 15 feet bgs.

Site Background

The site formerly operated as a steam electric power plant which operated from the 1900s through the 1950s and utilized crude oil for fuel. In April 2022, the Regional Water Quality Control Board (RWQCB) issued a letter requesting a subsurface investigation be conducted. Haley & Aldrich (H&A) conducted a subsurface investigation between April and August 2023 which included the collection of 32 soil, seven groundwater, and six soil vapor samples. Soil samples were analyzed for total petroleum hydrocarbons (TPH) as gasoline (TPHg), diesel (TPHd) and motor oil (TPHmo), benzene, toluene, ethylbenzene, and xylene (BTEX), and polycyclic aromatic hydrocarbons (PAHs). Groundwater was analyzed for TPHg, petroleum hydrocarbons and BTEX. Soil vapor samples were analyzed for TPHg, TPHd, TPHmo, and volatile organic compounds (VOCs).

Based on the updated 2025 RWQCB Environmental Screening Levels (ESLs) six of the soil samples contained concentrations of TPHd exceeding the Commercial/Industrial ESLs. None of the TPHmo detections exceeded 2019 or 2025 RWQCB Commercial/Industrial ESLs. Additionally, six PAHs were detected at concentrations exceeding 2019 and 2025 RWQCB ESLs in eight soil samples. TPHd was detected in groundwater samples exceeding the respective RWQCB ESL for Saltwater Ecotox Aquatic Habitat. Multiple VOCs as well as TPHg were detected in soil vapor samples above their laboratory reporting limit. Chloroform and tetrachloroethene (PCE) were detected in soil vapor samples at concentrations exceeding the RWQCB commercial/industrial ESLs of 18 micrograms per cubic meter (µg/m^3) and 67 µg/m^3, respectively.

H&A prepared a SMP for the site, on behalf of PG&E, to provide guidelines for any subsurface activities that may disturb soil and/or groundwater. The SMP provides mitigation measures for managing potentially impacted soil and groundwater at the site. The RWQCB granted case closure in a letter dated 27 November 2024 (Appendix B). The closure letter states that based on the previous subsurface investigations performed; no further action was required related to potential release of petroleum hydrocarbons associated with the historical PG&E use of the site. However, the RWQCB requires notification regarding any proposed changes in future land use or groundwater use at the site and that the August 2024 SMP is to be followed for future work involving the handling of soil or subsurface disturbance.

Based on the presence of PCE and chloroform in soil vapor at concentrations exceeding RWQCB ESLs, EKI Environmental & Water, Inc. (EKI) conducted indoor and ambient air sampling at the subject property to assess whether vapor intrusion is occurring. Seven indoor air samples and two ambient air samples were collected over an eight-hour period consistent with the commercial use of the property. EKI concluded that although PCE and chloroform are present in soil vapor at concentrations exceeding indoor air RWQCB ESLs, vapor intrusion does not appear to be occurring at the subject property.

Based on the recently conducted investigations at the site and the established SMP, Langan proposes the advancement of fourteen exploratory borings for the characterization of soil quality at the site to adequately characterize site soils per Article 22A and off-site disposal options. Additional groundwater sampling will not be performed during this investigation, however, given the anticipated depth of excavation for site redevelopment, groundwater dewatering and

potential treatment prior to discharge may be required. Also, based on the previous results of the soil vapor sampling collected at the site, no additional soil vapor sampling is included.

Field Investigation

Prior to commencing field work, we will prepare a health and safety plan for the drilling and sampling activities, contact Underground Service Alert (USA), and retain a private utility locator to conduct underground utility clearances at the boring locations. A drilling permit will be obtained from the SFDPH prior to commencing work. The objective of our sampling will be to evaluate potential for contaminated soil at the site, if any, by analyzing samples collected from fourteen borings to a maximum depth of 20 feet below ground surface (bgs) at the locations shown on Figure 2.

Soil Sampling

Fourteen exploratory borings will be advanced to 20 feet bgs using direct push methods on the existing pavement outside of the current building footprint. Soil samples will be collected from each of the borings at approximate depths of 1.5, 3.0, 5.0, 7.0, 10.0, 12.5, 15.0, and 20.0 feet bgs.

Laboratory Analytical Testing

Soil samples will be collected and analyzed for a combination of some or all of the chemical parameters discussed below at McCampbell. Samples proposed for initial analysis and samples proposed to be held pending potential future analysis are presented in Table 1. The chemical analytical schedule was chosen to satisfy Article 22A requirements and waste profiling scenarios generally accepted by landfills. The Maher Ordinance requires that samples be analyzed for a combination of some or all of the following:

- TPH-d, and TPHmo by United States Environmental Protection Agency (EPA) Method 8015.
- TPHg and VOCs by EPA Method 8260D (EnCore® samplers [EPA Method 5035]).
- Semi-volatile organic carbons (SVOCs) including PNAs and PAHs by EPA Method 8270C.
- Polychlorinated biphenyls (PCBs) by EPA Method 8082.
- California Assessment Manual (CAM) 17 metals by EPA Method 6020.
- Total cyanides by Standard Method SM 4500-CN.
- pH by EPA Method 9045D.
- Percent moisture.
- Asbestos by CARB Method 435; and
- Sulfides by Method SM4500 SD.

Each sample tube, made of stainless steel, will be sealed with Teflon and plastic caps, labeled, and placed on ice in a cooler for delivery to the State of California certified analytical laboratory under chain of custody procedures. For samples being analyzed for VOCs and TPHg, soil samples will be collected as independent, discrete samples, in accordance with USEPA Method 5035 using a 5-gram Encore sampling device. Samples will be sealed using the Encore sampler and a zip lock bag. Sample containers will be closed as soon as they are filled, chilled immediately to 4°C before being wrapped in bubble wrap, and processed for shipment to the laboratory.

If metal concentrations exceed the Total Threshold Limit Concentrations (TTLC) or if total metals exceed the soluble threshold limit concentration (STLC) by 10 times, samples will be analyzed by the California waste extraction test (WET) method to evaluate if the results exceed the California Class I hazardous waste criteria. If a soluble metal result exceeds the STLC, the sample will be analyzed by Toxicity Characteristic Leaching Procedure (TCLP), to evaluate if results exceed the Resource Conservation and Recovery Act (RCRA) or Federal hazardous waste criteria.

Data Evaluation and Reporting

After the conclusion of the sampling and analysis, Langan will prepare an Environmental Site Characterization (ESC) report describing investigation procedures and subsurface conditions and include laboratory results, boring logs, and tables illustrating the data collected. The ESC will outline our opinion regarding the presence of hazardous materials beneath the site, and constituents detected in soil that may impact future site users. The ESC will present recommended measures to mitigate potential risks to the environment and to protect construction workers, nearby residents, workers, and/or pedestrians from potential exposure to hazardous substances and underground structures that may be encountered during soil excavation and grading activities. The ESC will be sent to the SFDPH for review and approval prior to the start of any redevelopment activities.

If you have any questions, please call.

Sincerely,
Langan CA, Inc.

Dulce M Rodriguez Rivera, EIT
Senior Staff Engineer

Peter J. Cusack
Associate Principal

cc: Julian Marsh - Marina Property Owner, LLC

Attachments: Table 1 – Proposed Sample and Analysis Plan
Figure 1 – Site Location Map
Figure 2 - Site Plan with Proposed Boring Locations

TABLE

Table 1
Sampling and Analysis Plan
11-15 Marina Boulevard
San Francisco, California

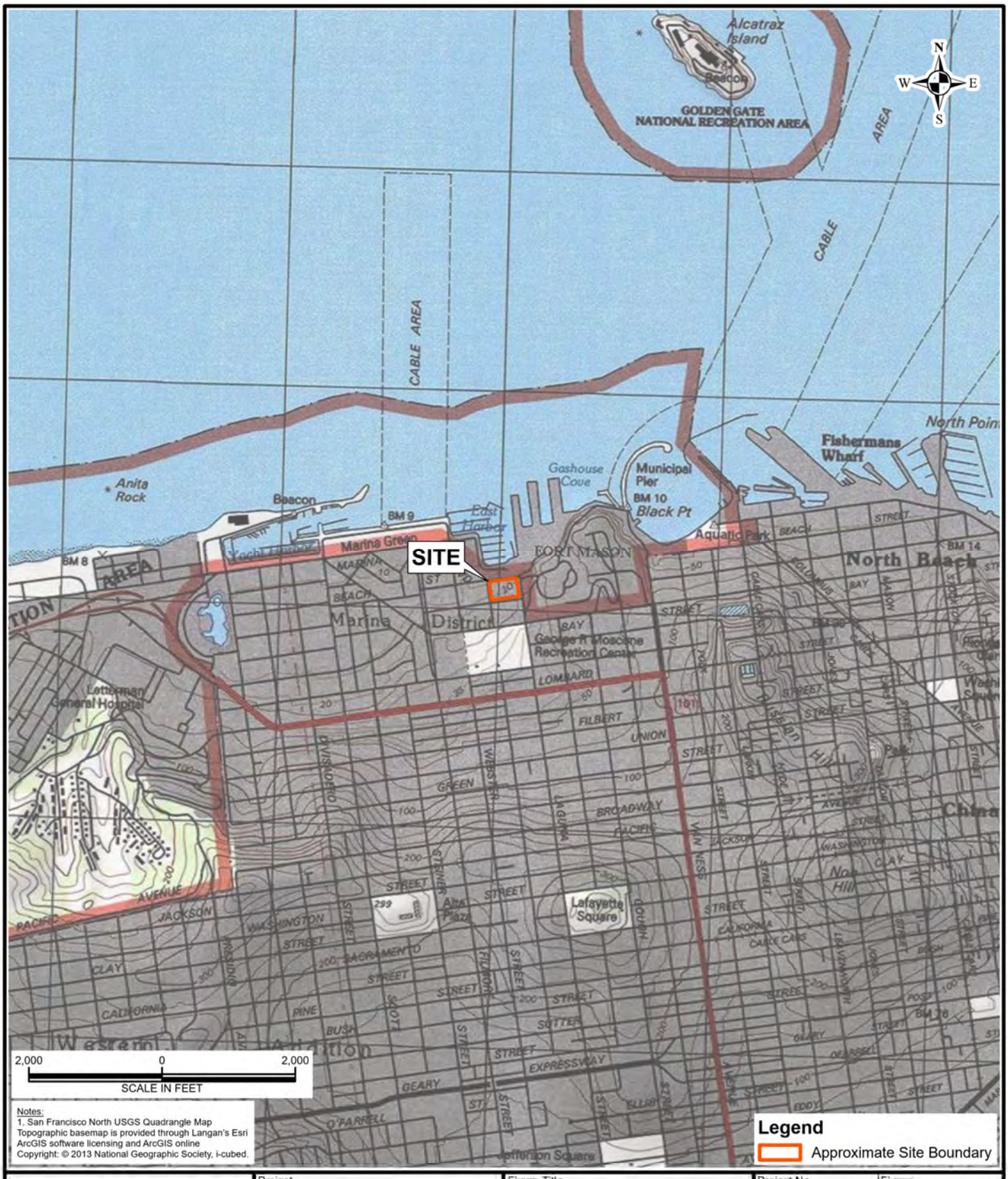
Sample ID	Depth (feet bgs)	Soil										
		TPH g,d,mo by EPA 8015M	VOCs by EPA 8260B	SVOCs by EPA 8270C	PCBs by EPA 8082	CAM 17 Metals by EPA 6020	Sulfides	Total Cyanide	pH	Asbestos by EPA CARB 435	Percent Moisture	HOLD
EB-1	1.5	X	X	X	X	X					X	
	3.0											X
	5.0	X	X	X	X	X	X	X	X		X	
	7.0	X				X					X	
	10.0											X
	12.5	X				X				X	X	
	15.0											X
	20.0											X
EB-2	1.5	X	X	X	X	X					X	
	3.0											X
	5.0	X				X						
	7.0										X	X
	10.0	X	X	X	X	X					X	
	12.5											X
	15.0	X				X				X	X	
	20.0											X
EB-3	1.5	X	X	X	X	X					X	
	3.0	X	X	X	X	X					X	
	5.0											X
	7.0	X				X					X	
	10.0											X
	12.5											X
	15.0											X
	20.0	X				X					X	
EB-4	1.5	X	X	X	X	X					X	
	3.0											X
	5.0	X				X					X	
	7.0											X
	10.0	X	X	X	X	X				X	X	
	12.5											X
	15.0	X				X					X	
	20.0											X
EB-5	1.5	X				X					X	
	3.0											X
	5.0	X				X					X	
	7.0											X
	10.0	X				X					X	
	12.5	X				X					X	
	15.0											X
	20.0											X
EB-6	1.5	X				X					X	
	3.0	X				X					X	
	5.0											X
	7.0											X
	10.0	X				X					X	
	12.5											X
	15.0	X				X					X	
	20.0											X
EB-7	1.5	X	X	X	X	X					X	
	3.0	X				X	X	X	X	X	X	
	5.0											X
	7.0	X				X					X	
	10.0											X
	12.5	X	X	X	X	X					X	
	15.0											X
	20.0											X
EB-8	1.5	X				X					X	
	3.0											X
	5.0	X	X	X	X	X					X	
	7.0	X				X					X	
	10.0											X
	12.5											X
	15.0											X
	20.0	X	X	X	X	X				X	X	
EB-9	1.5	X				X					X	
	3.0	X	X	X	X	X					X	
	5.0											X
	7.0											X
	10.0											X
	12.5	X				X					X	
	15.0	X	X	X	X	X				X	X	
	20.0											X
EB-10	1.5	X	X	X	X	X					X	
	3.0											X
	5.0	X	X	X	X	X					X	
	7.0	X				X					X	
	10.0	X				X					X	
	12.5											X
	15.0											X
	20.0											X

Table 1
Sampling and Analysis Plan
11-15 Marina Boulevard
San Francisco, California

EB-11	1.5	X	X	X	X	X					X	
	3.0	X				X					X	
	5.0	X				X					X	
	7.0											X
	10.0	X	X	X	X	X					X	
	12.5											X
	15.0											X
	20.0											X
EB-12	1.5	X	X	X	X	X					X	
	3.0											X
	5.0	X				X					X	
	7.0											X
	10.0											X
	12.5	X	X	X	X	X					X	
	15.0	X				X					X	
	20.0											X
EB-13	1.5	X				X					X	
	3.0	X	X	X	X	X					X	
	5.0	X				X					X	
	7.0	X	X	X	X	X	X	X	X	X	X	
	10.0											X
	12.5											X
	15.0											X
	20.0											X
EB-14	1.5	X	X	X	X	X					X	
	3.0											X
	5.0	X				X					X	
	7.0											X
	10.0	X	X	X	X	X					X	
	12.5	X				X					X	
	15.0											X
	20.0											X

Notes:
bgs - below ground surface
TPHg - Total Petroleum Hydrocarbons as Gasoline, EPA Method 8015M
TPHd - Total Petroleum Hydrocarbons as Diesel, EPA Method 8015M
TPHmo - Total Petroleum Hydrocarbons as Motor Oil, EPA Method 8015M
EPA - Environmental Protection Agency
VOCs - Volatile Organic Compounds, EPA Method 8260B
SVOCs - Semi-volatile Organic Compounds, EPA Method 8270C
PCBs - Polychlorinated Biphenyls, EPA Method 8082
CAM 17 - California Assessment Manual Metals
Asbestos by California Air Resource Board (CARB) 435 Method

FIGURES



LANGAN

Langan CA, Inc.

135 Main Street, Suite 1500
San Francisco, CA 94105

T: 415.955.5200 F: 415.955.5201
www.langan.com

Project	15 MARINA BOULEVARD SAN FRANCISCO SAN FRANCISCO COUNTY, CALIFORNIA
Figure Title	SITE LOCATION MAP
Project No.	731786102
Date	2/10/2026
Scale	1" = 2,000 feet
Drawn By	GS
Figure	1

Path: \\langan.com\data\SFO\data1\731786102\Project Data\ArcGIS\APRX\731786102\731786102.aprx

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Project
15 MARINA BOULEVARD
SAN FRANCISCO
SAN FRANCISCO COUNTY CALIFORNIA

Figure Title
SITE MAP WITH PROPOSED SOIL BORING LOCATIONS

Project No.	731786102
Date	2/10/2026
Scale	1" = 80 feet
Drawn By	GS

Figure 2

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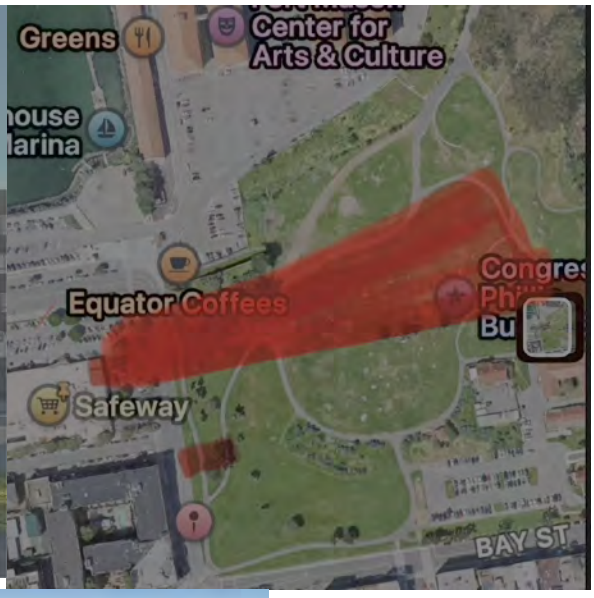
Path: \\langan.com\data\SFO\data1\731786102\Project Data\ArcGIS\APRX\731786102\731786102.aprx

EXHIBIT E

The shadow cast by a 4-story building, left. Imagine the shadow once expanded by 7.5x, right. An AI generated image of shadow is below.



Conclusion: This development denies everyone else the opportunity to enjoy sunny shared public space.

EXHIBIT F

Search

Uploaded by **friendsofmissioncree** 56 views

Marina Green Flooding Analysis by DPW engineers

AI-enhanced description

The document discusses the flooding at Marina Green, caused by the closure of the Pierce outfall, which was based on misleading information. It emphasizes the need for better oversight by public works

Read more

Study Suggests Lyrics Have Gotten Simpler Over Time

San Francisco's Sewer System

- Combined Sewer Discharges (CSD's)
- Treatment/Disposal (Effluent & Decant)
- Collection/Conveyance (Storage)

2

Collection System Facilities Defined:

- Gravity Conveyance
  - Catchbasins

– Catchbasins
– Side Sewers
– Manholes/Structures
– Main Sewers
– Tunnels
– Roadway Surface

- Transport/Storage Box Structures
- Discharge Structures/Outfalls
- Force Mains
- Pump Stations





3

AD

CSD and Treatment Facilities Defined:

Treatment Facilities

Southeast Plant

North Point Facilities

Oceanside Plant



Outfalls

Northeast Bay Outfall

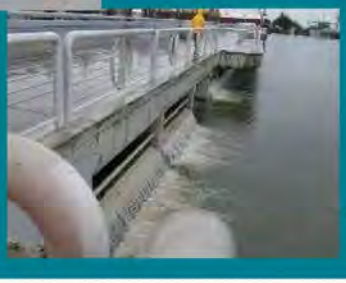
Southeast Bay Outfall

Southwest Ocean Outfall

Islais Creek Outfall

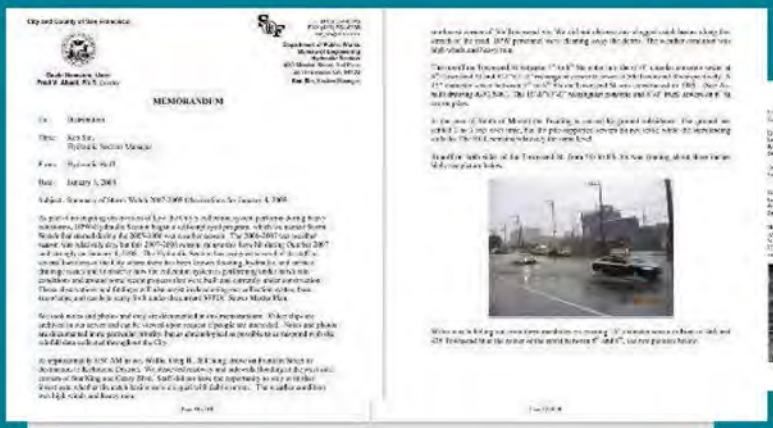
Division Street Outfall

Other Outfalls including formerly Pierce Street Outfall



4

Marina Green Area was never an issue.

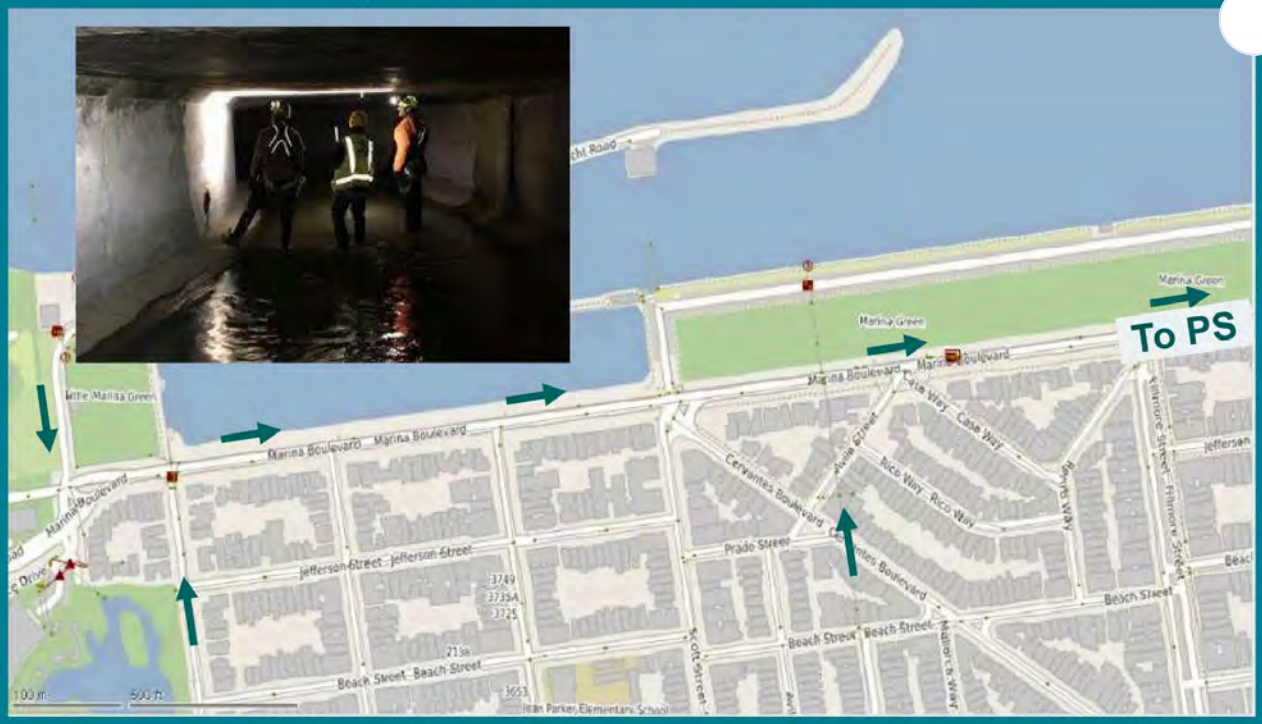

MEMORANDUM


STO

5

AD

Dry Weather Flow

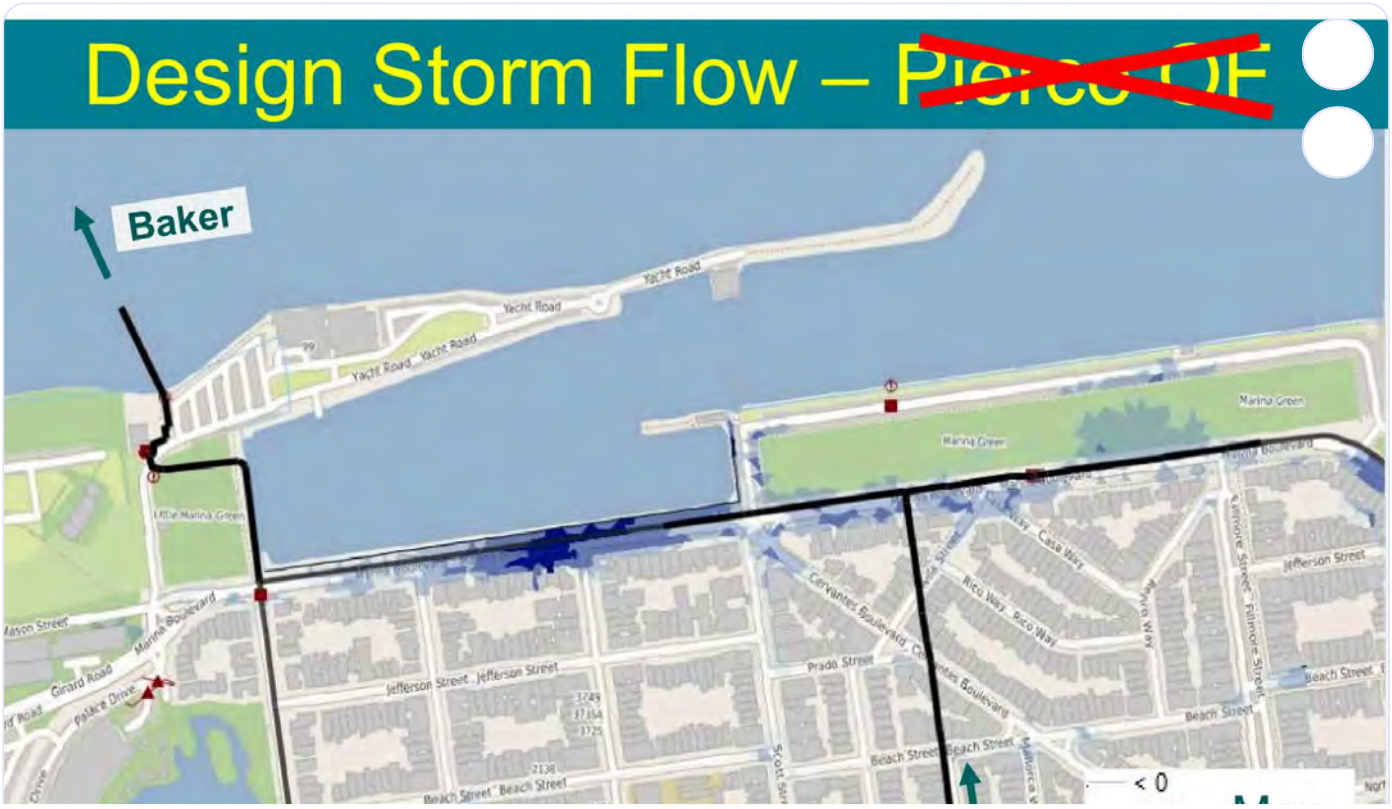


6

Design Storm Flow – Pierce OF


Marina Boulevard
Mason Street
Girard Road
Palace Drive
Jefferson Street
Prado Street
Beach Street
Scott Street
Avila Street
Capra Way
Rico Way
Cervantes Boulevard
Mallorca Way
Fillmore Street
North Point Street
Palace of Fine Arts
100 m
500 ft
< 0
>= 0
>= 40
>= 80
>= 120
>= 160
>= 200
Max. Flow (cfs)
7

AD


Design Storm Flow – Pierce OF
Baker
Yacht Road
Marina Green
Marina Boulevard
Mason Street
Girard Road
Palace Drive
Jefferson Street
Prado Street
Beach Street
Scott Street
Avila Street
Capra Way
Rico Way
Cervantes Boulevard
Mallorca Way
Fillmore Street
< 0

8

Marina Green Flooding

Conclusion and Recommendation:

The results of the H&H and Water Quality modeling performed indicate that closure of the Pierce CSD outfall will not affect the long-term average annual CSD frequency for the Northshore, will not increase the frequency or severity of flooding, and will have a net water quality benefit.

Excerpt from Assessment to Decommission Pierce CSD Memo - AECOM

Pierce Decommissioning: MC discussed the memo regarding recommendation for closure of Pierce where cracks were identified during annual inspection and led to the discussion on potential for closure of this outfall

a. Three different modeling analyses were done to evaluate the closure
- H&H model runs for typical year to evaluate the change in CSD events and volume for all six outfalls in North Shore basin. Results indicate that closure of Pierce outfall shifts flows to other outfalls with no net increase in North Shore basin.
- Receiving water quality model runs for done to assess the impact of flows shifted to other outfalls to the receiving water quality. Results indicate a total net positive benefit to the receiving water in North Shore.
- H&H model runs to evaluate the impact on flooding in LOS storm. Model results indicate marginal increase in HGL immediately at the outfall, and no change in surface flooding in the area.

b. The staff recommends closure of Pierce CSD
c. GN agreed with staff recommendation to decommission the CSD

Excerpt from Pierce CSD Decommissioning Meeting with WWE AGM Minutes

Project Needs

Summary

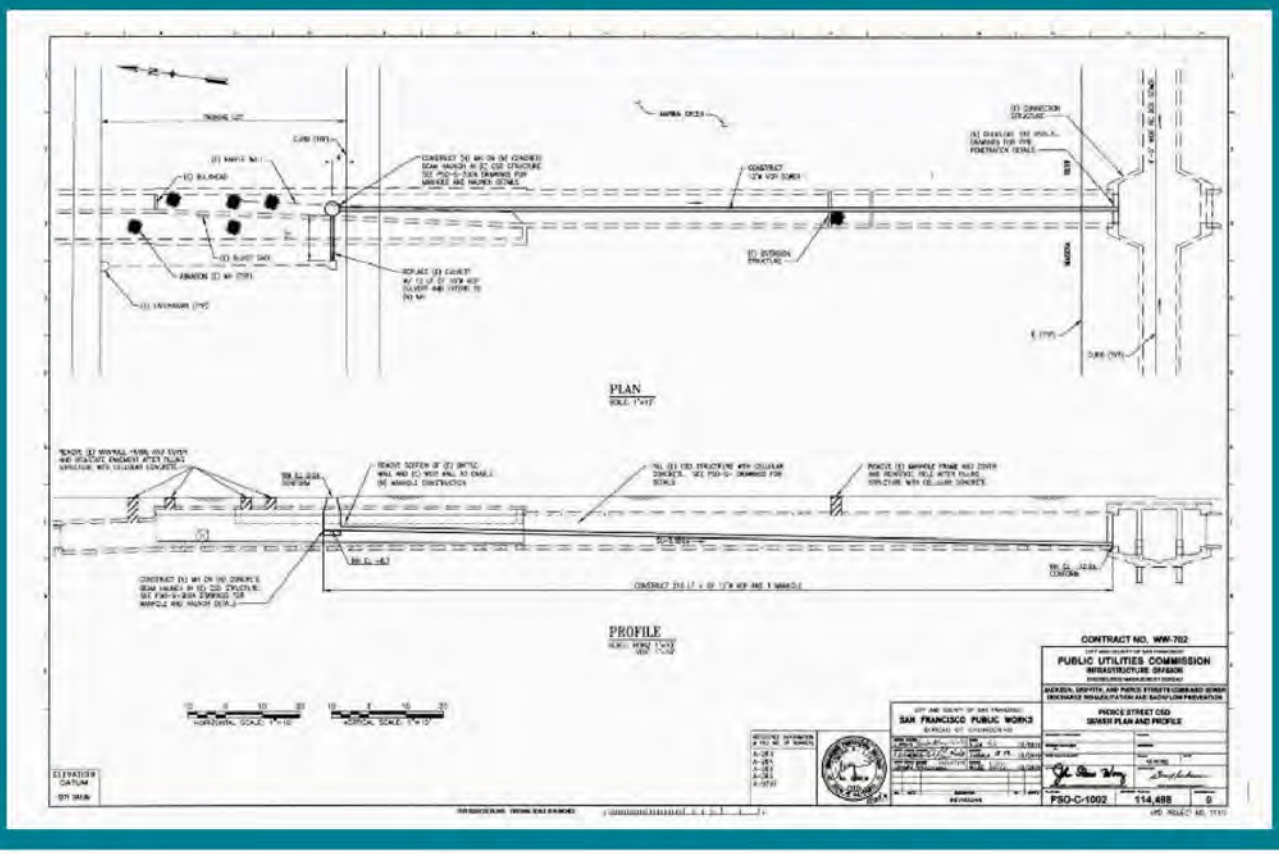
- Pierce St CSD structure is old and requires rehabilitation
- This CSD has the lowest weir elevation in the City without backflow prevention
- The CSD requires structural rehabilitation and backflow prevention, or decommissioning
- Pierce CSD Decommissioning was proposed by staff and was approved by WWE AGM (11/19/2018)
- Preferred concept (identified in alternatives analysis):
  - Decommission the CSD, fill with lightweight cellular concrete and abandon-in-place

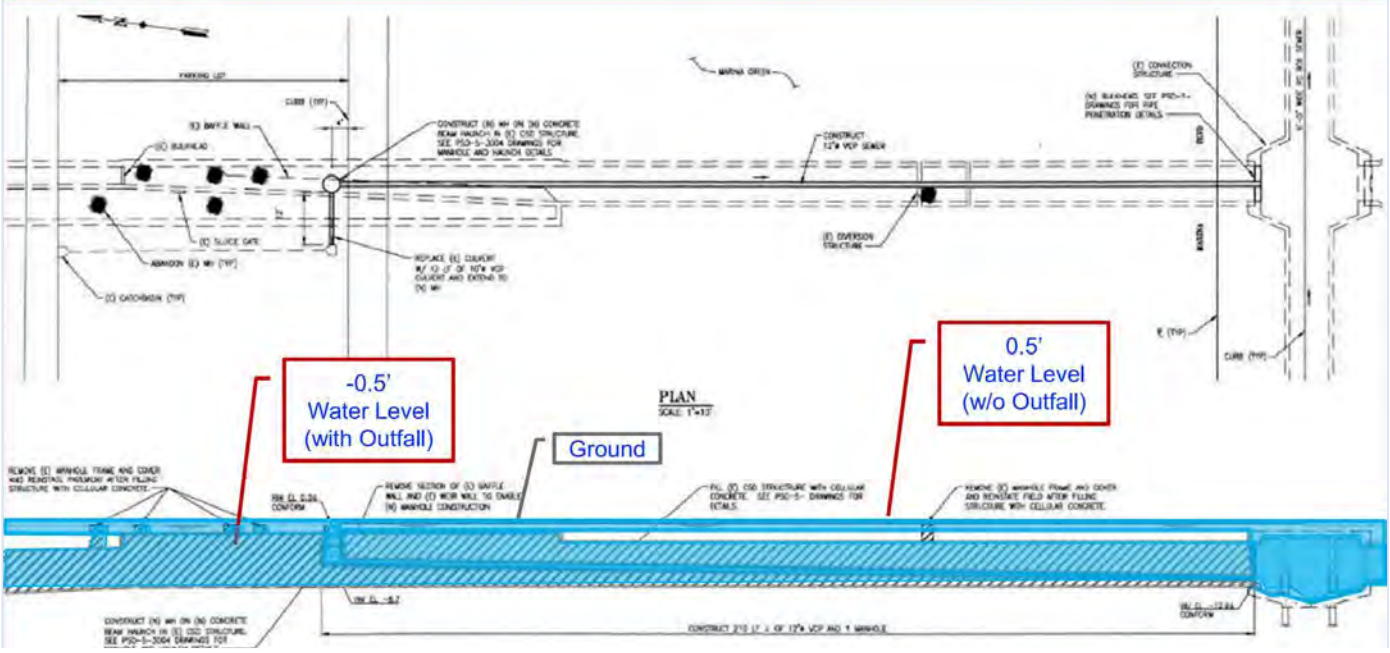
Excerpt from Pierce St CSD Decommissioning Project TSC Presentation

9

AD

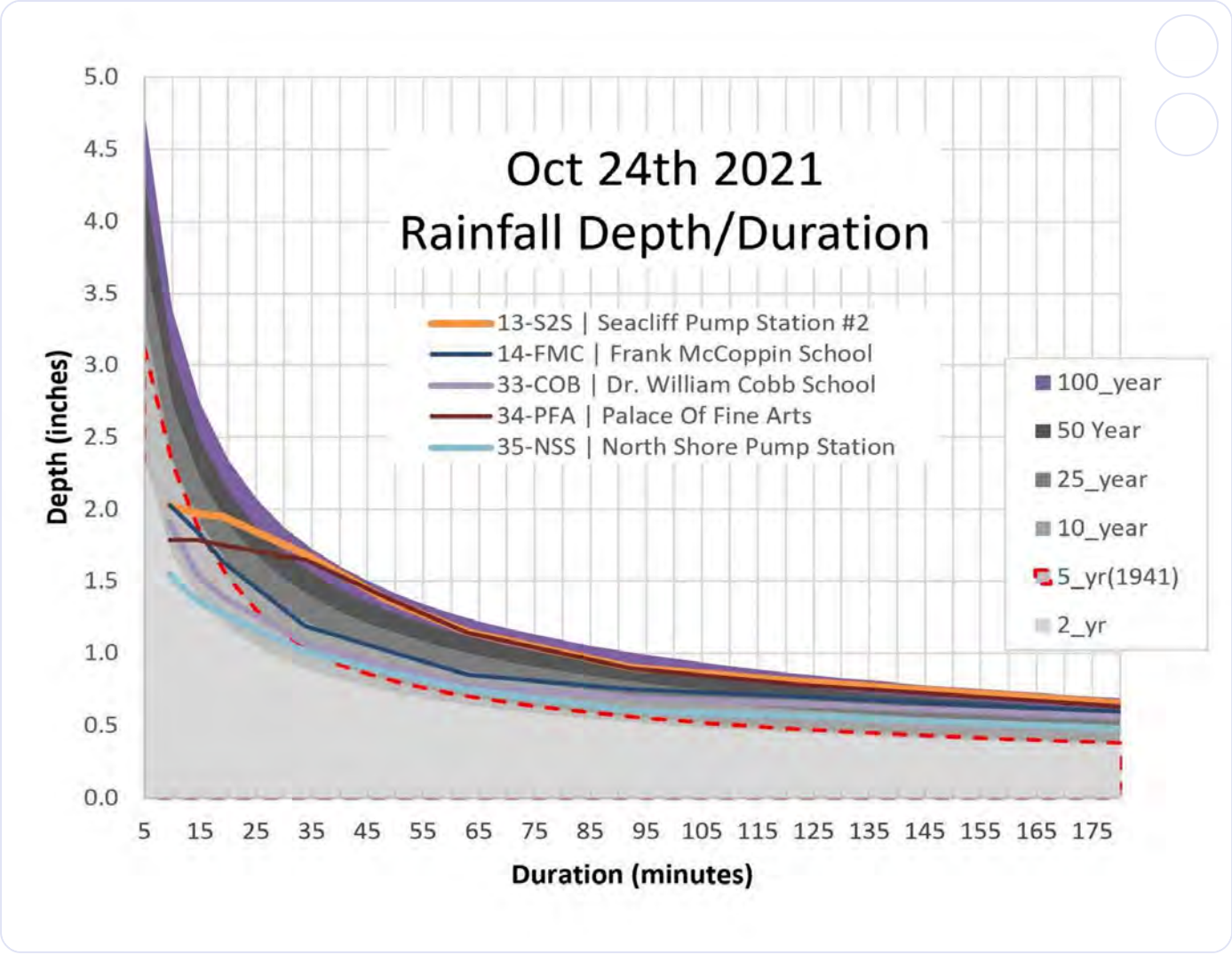
Marina Green Flooding

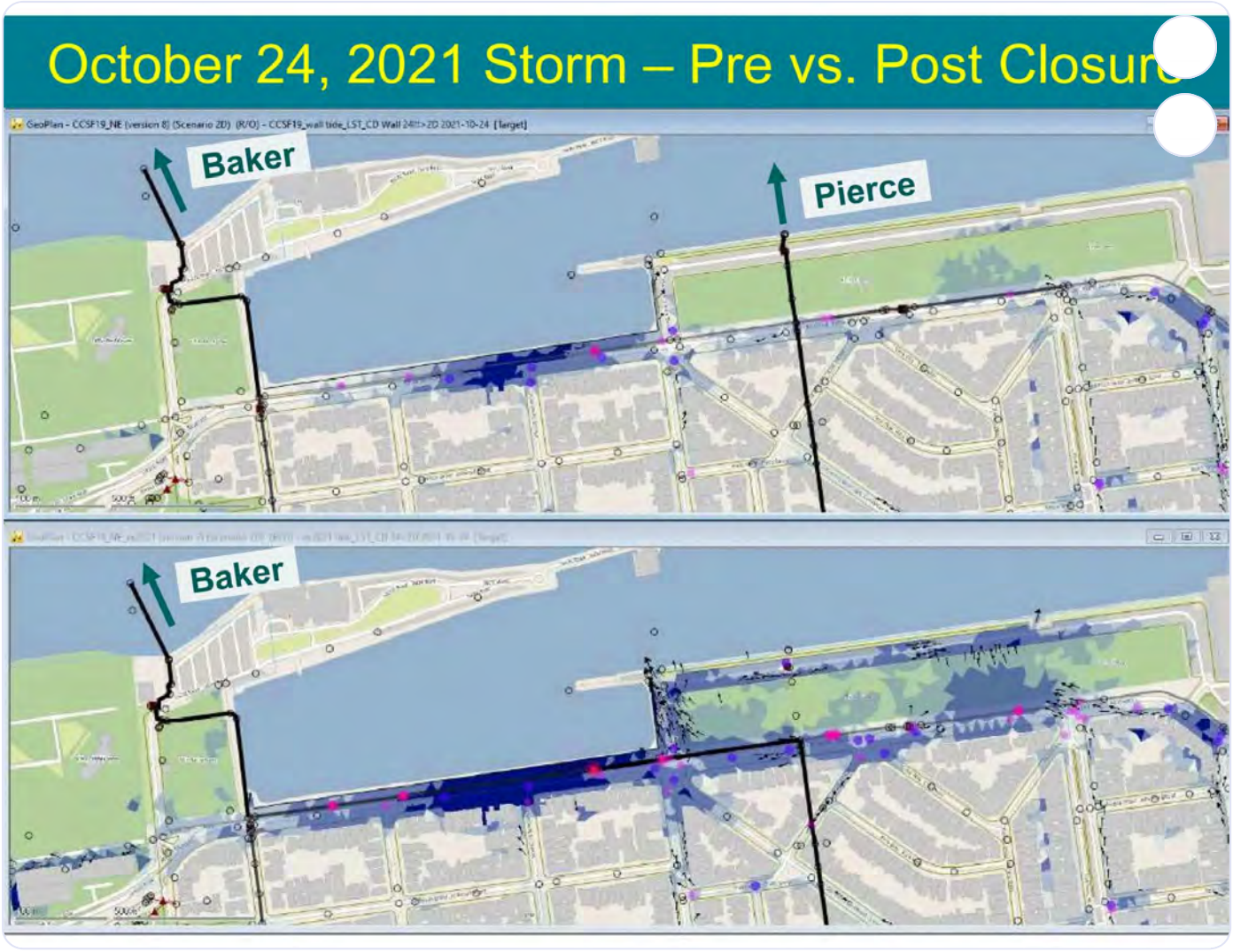




PROFILE

AD


Oct 24th 2021
Rainfall Depth/Duration
Depth (inches)
Duration (minutes)
5.0
4.5
4.0
3.5
3.0
2.5
2.0
1.5
1.0
0.5
0.0
5 15 25 35 45 55 65 75 85 95 105 115 125 135 145 155 165 175
13-S2S | Seacliff Pump Station #2
14-FMC | Frank McCoppin School
33-COB | Dr. William Cobb School
34-PFA | Palace Of Fine Arts
35-NSS | North Shore Pump Station
100_year
50 Year
25_year
10_year
5_yr(1941)
2_yr


October 24, 2021 Storm – Pre vs. Post Closure
Baker
Pierce
Baker

AD


Marina Green Flooding

- EHY provided the table. Wrong conclusions were drawn by PMC without our input

Exhibit A | Closure of Pierce CSD Outfall, June 2017 (SFPW)

Table 1: Peak Flood Conditions for Baseline and CSD Closure at Pierce Scenarios

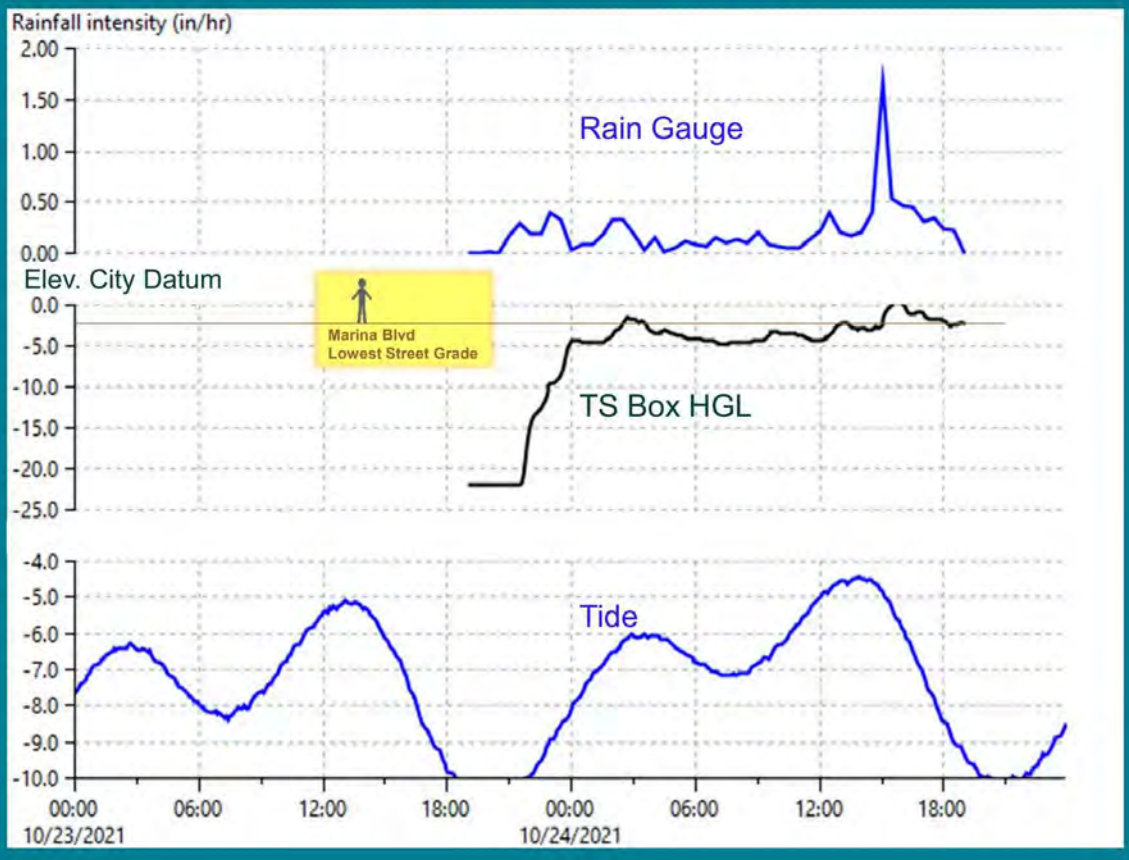
Design Storm	Flooding Sensitive Areas	Location	Peak Flood Depth, feet	
			Baseline	CSD Closure at Pierce
5-year 3-hour	Marina	Pierce St. & Marina Blvd	0.1	0.4
	North Beach	Jefferson St. & Taylor St.	-0.2	-0.1
	North Financial District	Jackson St. & Davis St.	2.1	2.0

3. H&H model runs were performed to evaluate the impact on flooding in LOS storm. Model results indicate marginal increase in HGL immediately at the outfall, and no change in surface flooding in the area.

These results were presented to AGM Wastewater Greg Norby on November 19, 2018, and minutes are provided in Exhibit C.

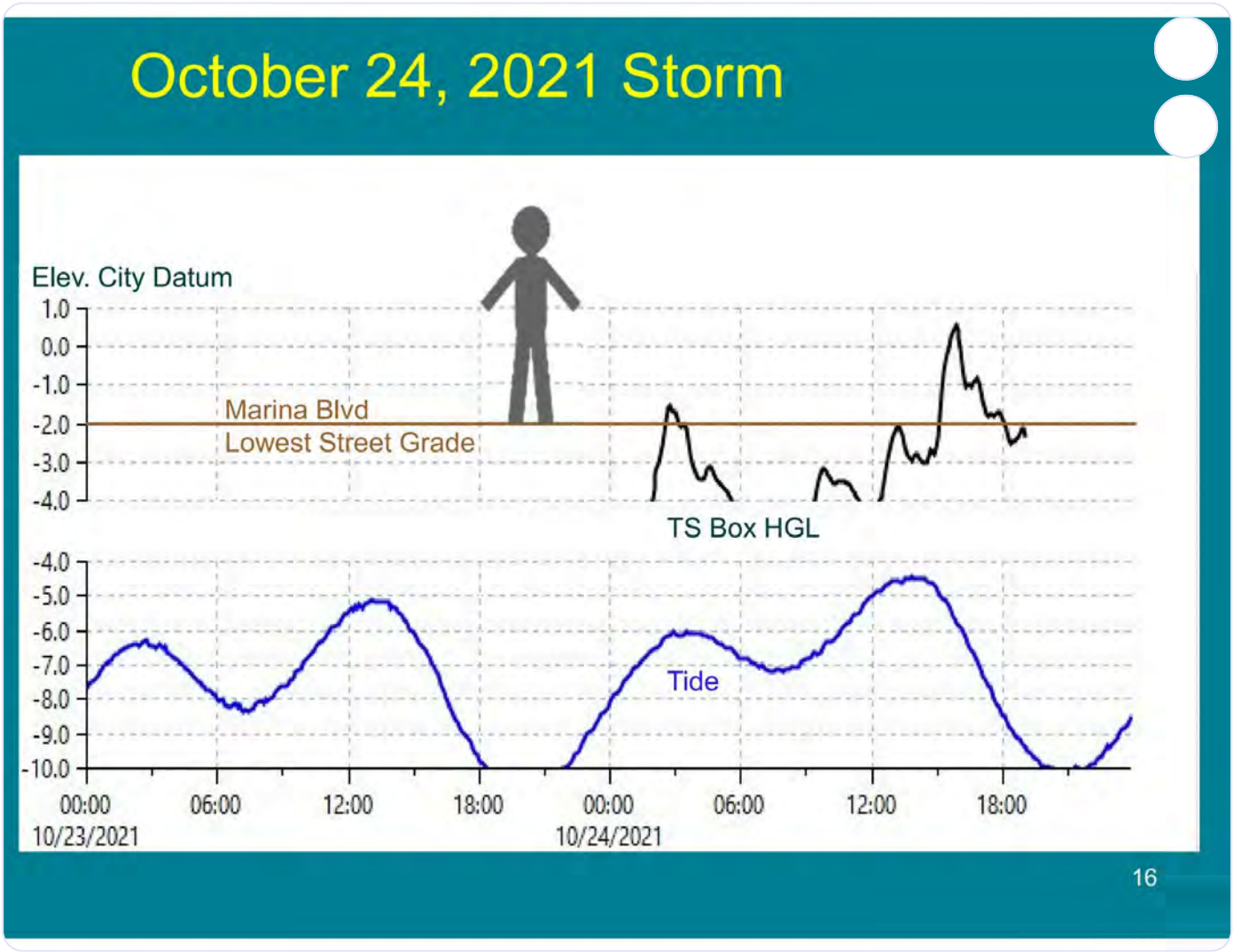
14

October 24, 2021 Storm

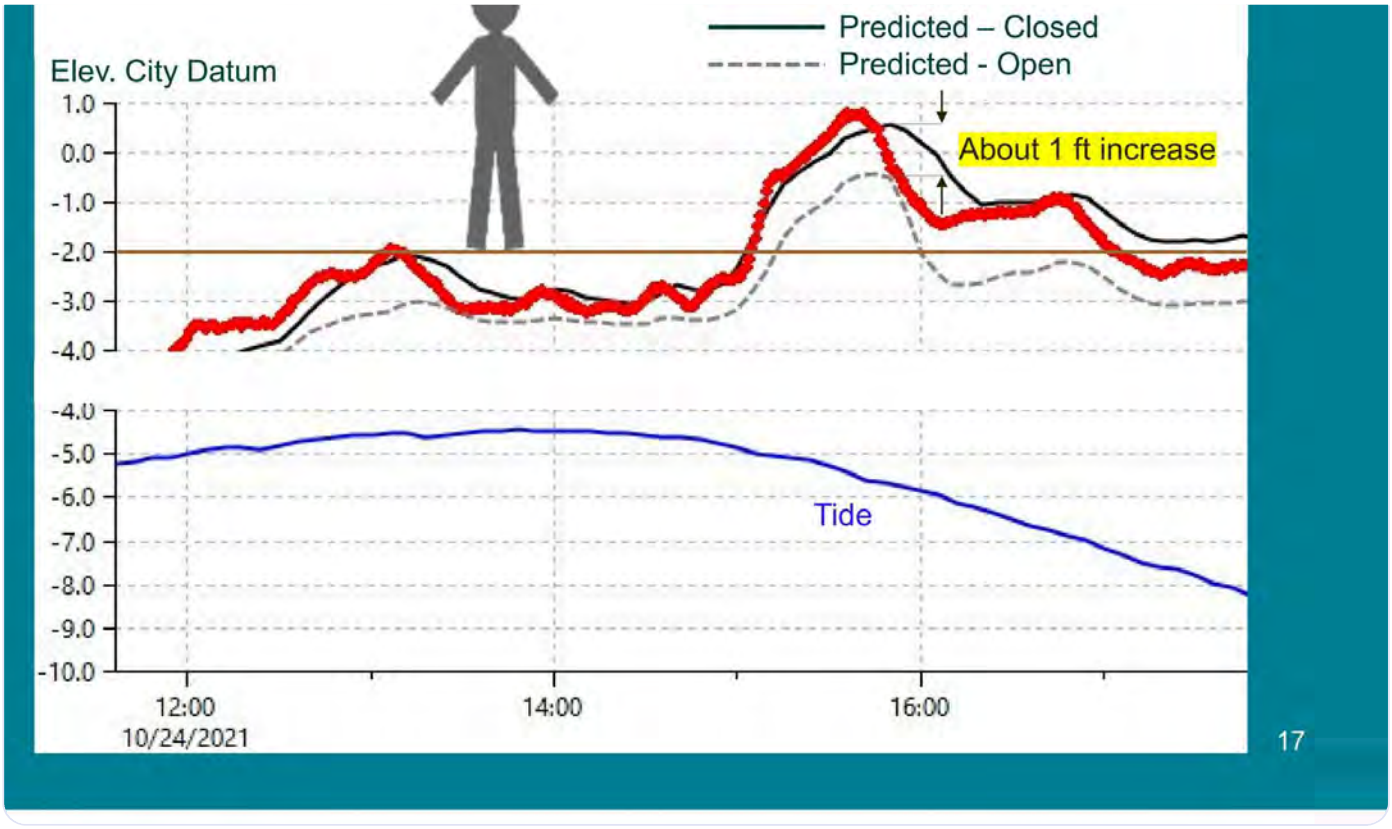


15

AD

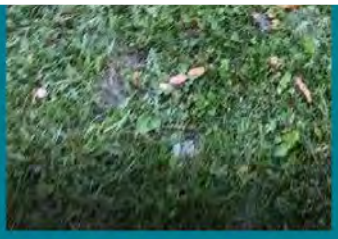

October 24, 2021 Storm
Elev. City Datum
1.0
0.0
-1.0
-2.0
-3.0
-4.0
Marina Blvd
Lowest Street Grade
TS Box HGL
-4.0
-5.0
-6.0
-7.0
-8.0
-9.0
-10.0
Tide
00:00
06:00
12:00
18:00
00:00
06:00
12:00
18:00
10/23/2021
10/24/2021
16


Pre vs Post Outfall Closure
TS Box HGL
Observed


Predicted – Closed
Predicted - Open
Elev. City Datum
About 1 ft increase
1.0
0.0
-1.0
-2.0
-3.0
-4.0
-4.0
-5.0
-6.0
-7.0
-8.0
-9.0
-10.0
Tide
12:00
10/24/2021
14:00
16:00
17

AD


October 24, 2021 - Marina Green Lawn



Grease chunk

Floatables

Baby wipes

S:\HYD\Storm_Watch\2021-2022\2021-10-24\observations\Marina_Green\photos_from_megans_phone\IMG_3650.MOV

18

October 24, 2021 - Marina Boulevard

Snaptik_7022774226767580422_madison.mp4

Snaptik_7022775583641799942_madison.mp4

Pictures Courtesy of City Staff and Tik Tok User

19

AD

Conclusions

- **Administrative decision to close the Pierce outfall based on misleading information provided to the SFPUC AGM led to intractable consequences, which is the new norm during high storm events.**
- The Pierce outfall closure not only caused the adjacent flood damage to the Marina Green area, but it has additional far-reaching impacts.
- Role of most City Engineers is constant vigilance and critical oversight to the public ROW (i.e., surface drainage flooding issues).
- Public Works Engineering must play a more assertive role in City's storm/wet weather issues as we have now demonstrated its impact to SFPUC/AECOM's "fatal flaw" concepts with Marina Green and other SSIP projects.
- Climate change will worsen rainfall and increase sea-level, both detrimental to our drainage service

20


Discussion
21

AD


Drainage System
Universal Engineering Practice
2021 July 19

Agenda

- Case-by-case Sewer Design Criteria for projects
- PUC is asking DPW to *ignore* Engineering Standards for drainage design
- Result will be increase in flooding of public right-of-way
- Numerous instances of *intimidation* of DPW Engineers from fulfilling their professional obligations
- DPW leadership is the only safeguard for flood resiliency

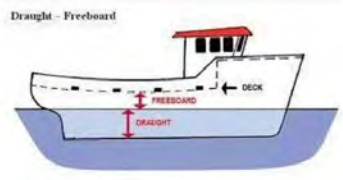
- Lessons from *Flint Water Crisis*

AD

Lessons from the Past

- Origin of a flood may not be obvious at the flood site itself
- Exceptions made in design, years before, far from the flood site, can cause unexpected flood damages
- City Engineers keep the City resilient to flooding by cohesively bringing all stakeholders together

Freeboard



AD

Hydraulic Design Standard

C. Hydraulic Considerations

The Subdivider shall select sewer sizes so that the hydraulic grade line shall, in general, be four feet below the pavement or ground surface, and at no point less than two feet.

The Subdivider shall use tidal elevation in hydraulic computations, where applicable, which is -3.5', Old City datum. Subdividers shall consult with the City and County Surveyor for conversion information to the newer CS-13 Datum.

The Subdivider shall address in large sewers hydraulic losses in bends where the velocity is seven feet per second or more.

75

Rainfall Return Periods

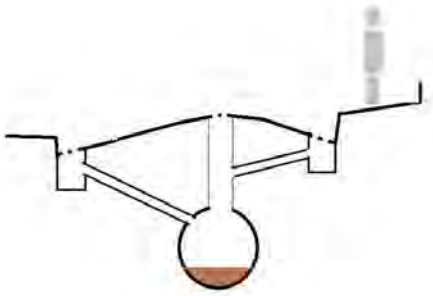
- Minor Storm
  - Sewer Service
    - 5-year 3-hour Rain
- Major Storm
  - FEMA Flood
    - 100-year 24-hours

RAIN INCHES

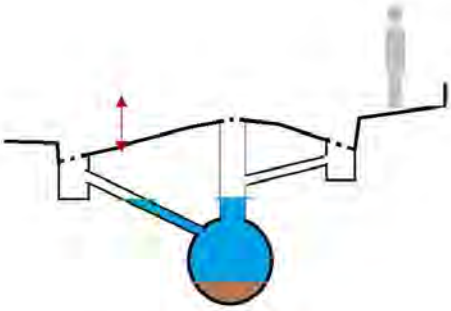
Duration	Average recurrence interval (years)				
	1	5	25	50	100
5-min	0.14	0.22	0.31	0.35	0.40
30-min	0.34	0.53	0.74	0.84	0.94
60-min	0.48	0.74	1.04	1.18	1.32
3-hr	0.84	1.27	1.78	2.01	2.26
6-hr	1.14	1.74	2.44	2.77	3.11
12-hr	1.49	2.33	3.33	3.82	4.32
24-hr	1.91	3.05	4.44	5.10	5.81

AD

R.O.W. cross-sections

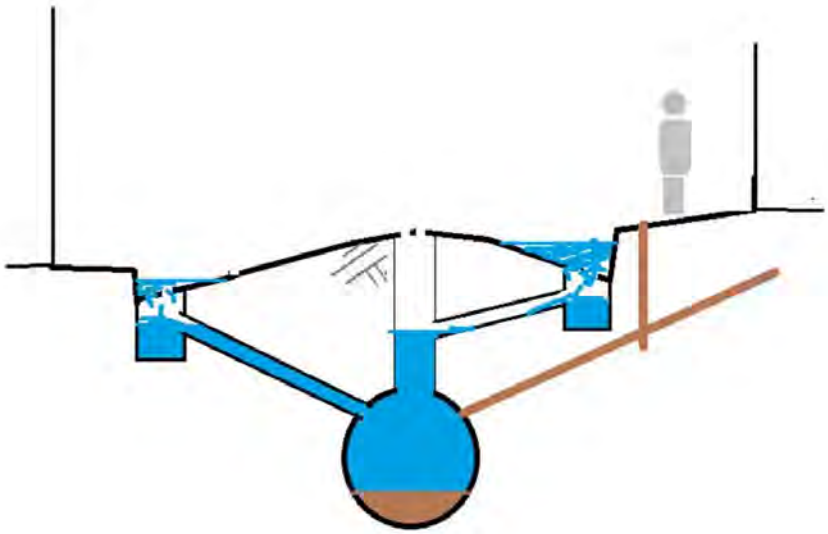


Sanitary Flow Only



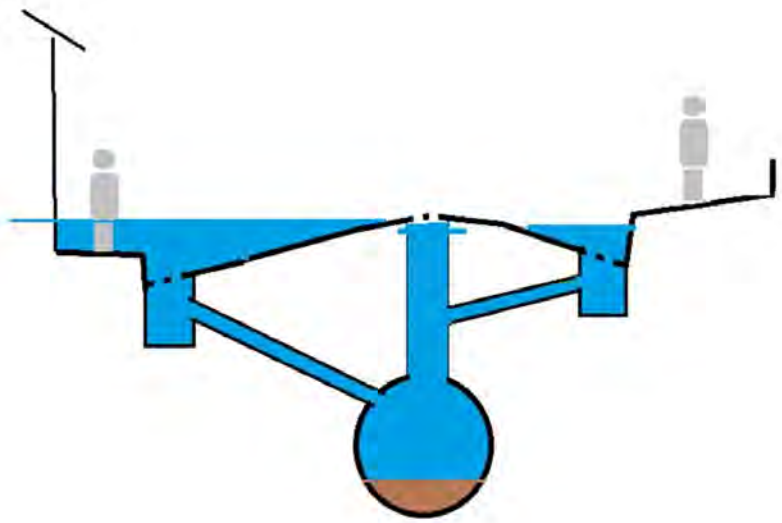
Combined Sewer during Rain

5-yr Design Storm



AD

Proposal
No-freeboard “Standard”



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Marina Green Flooding Analysis by DPW engineers

1. 1 Marina Green Flooding– October 24, 2021 Background and Consequences to Public Works Director and City Engineer Photo Courtesy of Scott Grindy SF Marina Harbor Master P U BLIC W ORK S
2. 2 San Francisco’s SewerSystem • Combined Sewer Discharges (CSD’s) • Treatment/Disposal (Effluent & Decant) • Collection/Conveyance (Storage)
3. 3 Collection System FacilitiesDefined: • Gravity Conveyance – Catchbasins – Side Sewers – Manholes/Structures – Main Sewers – Tunnels – Roadway Surface • Transport/Storage Box Structures • Discharge Structures/Outfalls • Force Mains • Pump Stations

4. 4 CSD and TreatmentFacilities Defined: Outfalls Treatment Facilities Northeast Bay Outfall Southeast Bay Outfall Southwest Ocean Outfall Southeast Plant Oceanside Plant North Point Facilities Islais Creek Outfall Division Street Outfall Other Outfalls including formerly Pierce Street Outfall
5. 5 Marina Green Areawas never an issue.
6. 6 Dry Weather Flow
7. 7 Design Storm Flow– Pierce OF Max. Flow (cfs)
8. 8 Design Storm Flow– Pierce OF Max. Flow (cfs)
9. 9 Marina Green Flooding Excerptfrom Assessment to Decommission Pierce CSD Memo - AECOM Excerpt from Pierce CSD Decommissioning Meeting with WWE AGM Minutes Excerpt from Pierce St CSD Decommissioning Project TSC Presentation
10. 10 Marina Green Flooding
11. Ground 0.5′ Water Level (w/o Outfall) -0.5′ WaterLevel (with Outfall)
12. 12
13. 13 October 24, 2021Storm – Pre vs. Post Closure
14. 14 Marina Green Flooding •EHY provided the table. Wrong conclusions were drawn by PMC without our input
15. 15 October 24, 2021Storm Marina Blvd Lowest Street Grade TS Box HGL Tide Rain Gauge Elev. City Datum
16. 16 October 24, 2021Storm Marina Blvd Lowest Street Grade Elev. City Datum TS Box HGL Tide
17. 17 Pre vs PostOutfall Closure About 1 ft increase Elev. City Datum TS Box HGL Observed Predicted – Closed Predicted - Open Tide
18. 18 October 24, 2021- Marina Green Lawn S:HYDStorm_Watch2021-20222021-10-24observationsMarina_Greenphotos_from_megans_phoneIMG_3650.MOV Grease chunk Floatables Baby wipes
19. 19 October 24, 2021- Marina Boulevard Snaptik_7022774226767580422_madison.mp4 Snaptik_7022775583641799942_madison.mp4 Pictures Courtesy of City Staff and Tik Tok User
20. 20 Conclusions • Administrative decisionto close the Pierce outfall based on misleading information provided to the SFPUC AGM led to intractable consequences, which is the new norm during high storm events. • The Pierce outfall closure not only caused the adjacent flood damage to the Marina Green area, but it has additional far-reaching impacts. • Role of most City Engineers is constant vigilance and critical oversight to the public ROW (i.e., surface drainage flooding issues). • Public Works Engineering must play a more assertive role in City's storm/wet weather issues as we have now demonstrated its impact to SFPUC/AECOM's "fatal flaw" concepts with Marina Green and other SSIP projects. • Climate change will worsen rainfall and increase sea-level, both detrimental to our drainage service
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24. Lessons from thePast •Origin of a flood may not be obvious at the flood site itself •Exceptions made in design, years before, far from the flood site, can cause unexpected

flood damages •City Engineers keep the City resilient to flooding by cohesively bringing all stakeholders together

25. Freeboard
26. Hydraulic Design Standard
27. Rainfall Return Periods •MinorStorm Sewer Service • 5-year 3-hour Rain •Major Storm FEMA Flood • 100-year 24-hours
28. R.O.W. cross-sections Sanitary FlowOnly Combined Sewer during Rain
29. 5-yr Design Storm
30. Proposal No-freeboard “Standard”

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