San Francisco Planning

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

# FINAL MITIGATED NEGATIVE DECLARATION

| | |
|---|---|
| *PMND Date:* | May 26, 2021, amended on July 8, 2021 (amendments to the PMND include deletions, shown as ~~strikethrough~~, and additions, shown as double underline) |
| *Case No.:* | 2015-012577ENV |
| *Project Title:* | 1200 Van Ness Avenue |
| *Zoning:* | RC-4 (Residential-Commercial, High Density) Use District<br>Van Ness Special Use District<br>Van Ness Automotive Special Use District<br>130-V Height and Bulk District |
| *Block/Lot:* | 0691/003 and 0691/005 |
| *Lot Size:* | 37,830 square feet |
| *Project Sponsor:* | Jim Abrams, J. Abrams Law, P.C. – (415) 999-4402<br>jabrams@jabramslaw.com |
| *Lead Agency:* | San Francisco Planning Department |
| *Staff Contact:* | Jeanie Poling – (628) 652-7559<br>Jeanie.poling@sfgov.org |

## Project Description

The proposed project would result in the demolition of an existing building complex (that contains a 192-space public parking garage, retail, and health service uses) and the construction of a new 13-story building containing health service, residential, and retail uses, and a 275-space below-grade accessory parking garage. Vehicular access to the parking garage would be provided from Post Street, and vehicles would exit the parking garage via Hemlock Street. The attached initial study contains a comprehensive project description, including figures, and an anticipated list of required project approvals.

## Finding

This project could not have a significant effect on the environment. This finding is based upon the criteria of the Guidelines of the State Secretary for Resources, sections 15064 (Determining the Significance of the Environmental Effects Caused by a Project), 15065 (Mandatory Findings of Significance), and 15070 (Decision to Prepare a Negative or Mitigated Negative Declaration), and the following reasons as documented in the initial study for the project, which is attached. Mitigation measures are included in this project to avoid potentially significant effects. See Section F, Mitigation Measures and Improvement Measures, p. 158.

In the independent judgment of the planning department, there is no substantial evidence that the project could have a significant effect on the environment.

Devyani Jain

Lisa Gibson
Environmental Review Officer

July 8, 2021
Date of Issuance of Final Mitigated Negative Declaration

cc: Jim Abrams, J. Abrams Law, P.C.
Supervisor Aaron Peskin, District 3
Mary Woods, Current Planning Division
Project Distribution

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## List of Tables

## List of Abbreviations and Acronyms

| | |
|---|---|
| µg/m$^3$ | micrograms per cubic meter |
| ABAG | Association of Bay Area Governments |
| AC Transit | Alameda-Contra Costa County Transit District |
| ADRP | archeological data recovery plan |
| air basin | San Francisco Bay Area Air Basin |
| air district | Bay Area Air Quality Management District |
| APIP | archeological public interpretation plan |
| ARPP | archeological resource preservation plan |
| ARR | archeological resources report |
| ATP | archeological testing plan |
| BART | Bay Area Rapid Transit |
| bgs | below ground surface |
| BMPs | best management practices |
| BRT | Bus Rapid Transit |
| CalEEMod | California Emissions Estimator Model |
| California Register | California Register of Historical Resources |
| CARB | California Air Resources Board |
| CCR | California Code of Regulations |
| CEQA | California Environmental Quality Act |
| CNEL | Community Noise Equivalent Level |
| CO | carbon monoxide |
| dB | decibels |
| dBA | A-weighted decibels |
| DPM | diesel particulate matter |
| EPA | United States Environmental Protection Agency |
| ERO | Environmental Review Officer |
| FAR | floor area ratio |
| FHWA | Federal Highway Administration |
| FTA | Federal Transit Administration |
| GHG | greenhouse gas |
| gsf | gross square feet |

| | |
|---|---|
| HEPA | High Efficiency Particulate Air |
| hp | horsepower |
| HVAC | heating, ventilation, and air conditioning |
| I-280 | Interstate 280 |
| I-80 | Interstate 80 |
| in/sec | inches per second |
| lbs/day | pounds per day |
| $L_{eq}$ | equivalent continuous noise level |
| $L_{max}$ | maximum instantaneous noise level |
| mgd | million gallons per day |
| MLD | Most Likely Descendant |
| mph | miles per hour |
| MRZ4 | Mineral Resource Zone 4 |
| MUA | make-up air |
| NCD | Neighborhood Commercial District |
| $NO_2$ | nitrogen dioxide |
| $NO_X$ | nitrogen oxides |
| NPDES | National Pollutant Discharge Elimination System |
| NWIC | Northwest Information Center |
| PDA | Priority Development Area |
| PM | particulate matter |
| $PM_{10}$ | particulate matter less than 10 microns in size |
| $PM_{2.5}$ | particulate matter less than 2.5 microns in size |
| Ppm | parts per million |
| PPV | peak particle velocity |
| QACL | qualified archeological consultants list |
| regional board | Regional Water Quality Control Board |
| ROG | reactive organic gases |
| SamTrans | San Mateo County Transit District |
| SF Guidelines | Transportation Impact Analysis Guidelines for Environmental Review |
| SFMTA | San Francisco Municipal Transportation Agency |
| SFPUC | San Francisco Public Utilities Commission |

| | |
|---|---|
| $SO_2$ | sulfur dioxide |
| SUD | Special Use District |
| TACs | toxic air contaminants |
| TAZ | transportation analysis zone |
| TNC | transportation network company |
| US 101 | US Highway 101 |
| VDECS | Verified Diesel Emission Control Strategy |
| VMT | vehicle miles traveled |
| VRV | variable refrigerant volume |

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# INITIAL STUDY

## 1200 Van Ness Avenue
## Planning Department Case No. 2015-012577ENV

## A. Proposed Project

### Project Location and Site Characteristics

The 37,830-square-foot (approximately 0.87-acre) rectangular project site is located on the east side of Van Ness Avenue, within the Downtown/Civic Center neighborhood. The project site is located within a portion of the block bounded by Hemlock Street to the north, Polk Street to the east, Post Street to the south, and Van Ness Avenue to the west (Assessor's Block 0691 Lots 005 and 003). The approximately 29,580-square-foot[1] Lot 5 occupies frontage on Van Ness Avenue and Post and Hemlock streets. The approximately 8,250-square-foot Lot 3 occupies frontage on Post and Hemlock streets. (see **Figure 1, Project Vicinity Map; Figure 2, Aerial Photograph of the Project Site and Surrounding Land Uses;** and **Figure 3, Existing Site Plan**, pp. 3, 4, and 5, respectively).

The project site slopes upward from southeast to northwest from approximately 125 feet to 155 feet above mean sea level. The site also slopes upward generally from the south to north with a grade change of approximately 10 feet from Post Street to Hemlock Street. The site is currently built with a five-story (up to 53-foot-tall) approximately 190,650-square-foot building complex that covers the entirety of both lots and extends to the property lines on all street frontages. Because of the sloped condition of the site, the five-story building has the appearance of four stories from Van Ness Avenue. Lot 5 contains a five-story, approximately 116,810-square-foot reinforced concrete portion of the building complex originally constructed in 1911, with property addresses at 1200 Van Ness Avenue and 1160-1180 Post Street. Lot 3 includes one five-story approximately 41,230-square-foot portion of the building complex that was constructed as an annex to the 1200 Van Ness Avenue building in 1947, with a property address of 1130-1150 Post Street. Currently, the building includes approximately 53,450 square feet of health service uses (5,200 square feet of which is currently occupied by an existing tenant), located above 46,220 square feet of retail space (13,995 square feet of which is currently occupied by two existing tenants) and a 74,950-square-foot above-ground public parking garage with 192 parking spaces that occupies the majority of the 1160-1180 Post Street portion of the building complex. A total of approximately 60 employees are currently employed at the project site.

Vehicular access to the project site currently consists of a single curb cut east of the 1166 Post Street building lobby, providing two-lane access (i.e., for entry and exit) to the parking garage. Hemlock Street provides a secondary vehicular exit; however, according to the project sponsor, operation of the exit is currently suspended, and the exit has been closed with a rolled-down gate since 2013 due to persistent on-site security issues. A total of four street trees are currently located along the Van Ness Avenue frontage.

[1] All square footages are approximate and rounded to the nearest tenth.

## Proposed Project Characteristics

The proposed project would result in the demolition of the existing building complex on the project site and the construction of a new, 13-story (approximately 130-foot-tall, excluding approximately 16-foot-tall rooftop appurtenances) building containing health service, residential, and retail uses as well as a below-grade parking garage. Proposed building characteristics; open space and landscaping; and site access, parking and loading are described below. **Figure 4, Proposed Site Plan,** p. 6 depicts the overall proposed site plan and **Figures 5 through 12**, pp. 7 through 14 depict the garage through roof level plans. **Figures 13 through 16**, pp. 15 through 18 depict the proposed building elevations and **Figure 17, Proposed Building Section**, p. 19 depicts a typical building section. **Table 1, Proposed Project Details,** provides a summary of the proposed project, compared to existing conditions.

### Table 1: Proposed Project Details

| Use | Existing | Proposed | Net Change |
|---|---|---|---|
| Health service (gsf) | 53,450 | 106,700 | 53,250 |
| Residential (gsf) | -- | 130,170 | 130,170 |
| Retail (gsf) | 46,220 | 24,520 | (21,700) |
| Restaurant (gsf) | -- | 4,340 | 4,340 |
| Parking garage (gsf) | 74,950 | 137,580 | 62,630 |
| Total floor area (gsf) | 190,650 | 438,180 | 247,530 |
| Building stories | 5 | 13 | 8 |
| Building height (with rooftop appurtenances) (ft) | 53 | 130<br>(146) | 77 |
| Below-grade floor levels | 0 | 4 | 4 |
| Residential open space (gsf) | -- | 10,470 | 10,470 |
| **DWELLING UNITS** | | | |
| Number of dwelling units | -- | 107 | 107 |
| One-bedroom | -- | 59 | 59 |
| Two-bedroom | -- | 48 | 48 |
| **VEHICLE AND BICYCLE PARKING** | | | |
| Number of vehicle parking spaces | 192 | 275 | 83 |
| Car share spaces | -- | 5 | 5 |
| Number of off-street loading spaces | -- | 4 | 4 |
| Number of on-street loading spaces[1] | 5 | 17 | 12 |
| Bicycle parking (class 1) | -- | 127 | 127 |
| Bicycle parking (class 2) | -- | 26 | 26 |

Source: Woods Bagot, 1200 Van Ness Project Application Updates, February 21 and October 28, 2020, and J. Abrams Law, P.C., 1200 Van Ness Avenue Gross Square Footage Area Table, July 8, 2020.

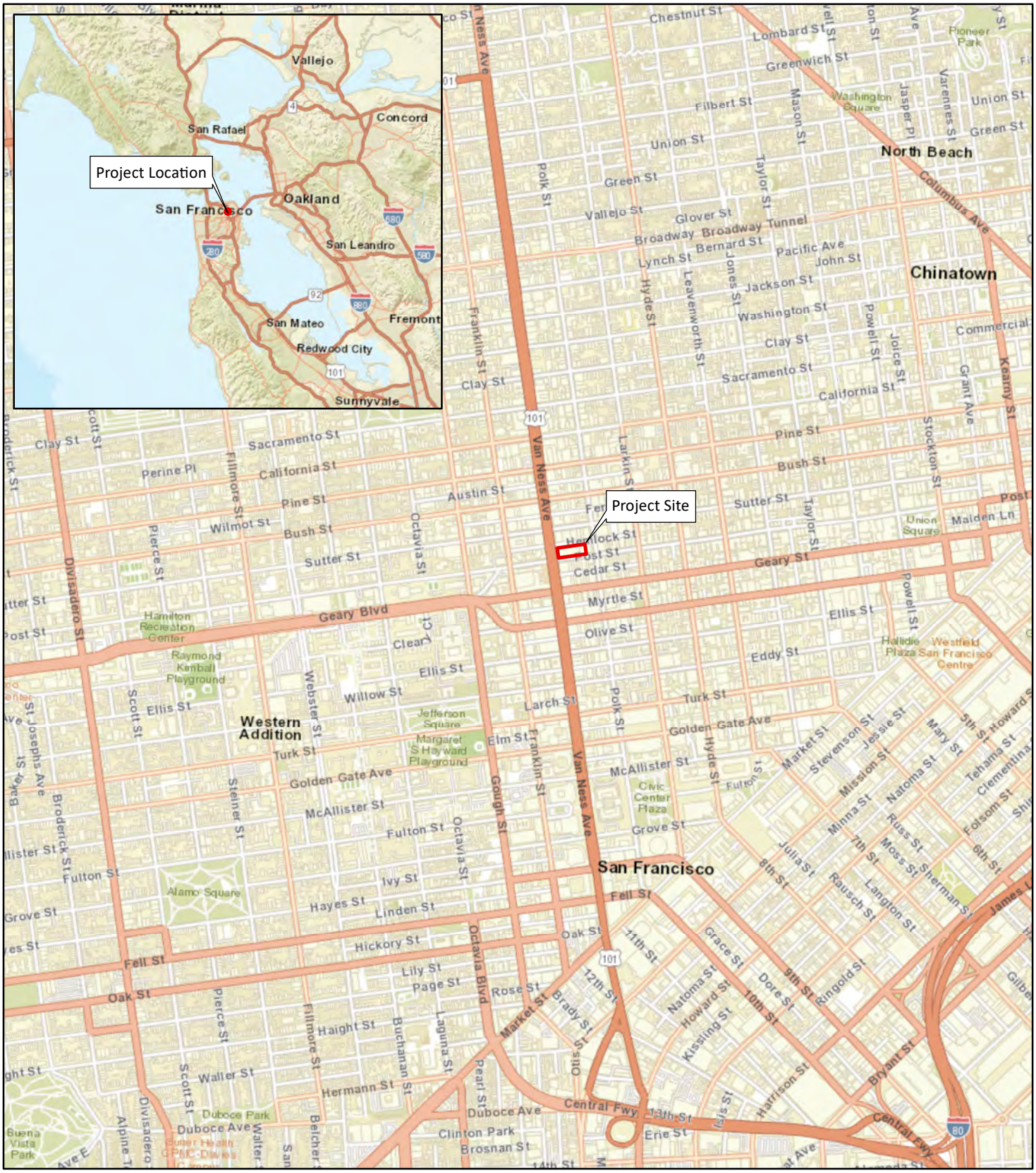
Note: All numbers around rounded to the nearest tenth.

[1] Three existing passenger loading spaces (61 feet) are located on Post Street and two commercial loading spaces (49 feet) are located on Hemlock Street. Street network changes to be implemented as part of the project would provide a total of four commercial loading spaces (83 feet) and two passenger loading zones containing seven spaces (158 feet) on Post Street; four commercial loading spaces (80 feet) on Hemlock Street; and two passenger loading spaces (53 feet) on Van Ness Avenue.

gsf = gross square feet

ft = feet

in = inches




LEGEND

Project Site

**FIGURE 1**

N

0 750 1500

FEET

SOURCE: ESRI World Street Map (2020).

*1200 Van Ness Avenue Project*

Project Vicinity Map


**FIGURE 2**

N

0 150 300
FEET

Project Boundary

*1200 Van Ness Avenue Project*

Aerial Photograph of the Project Site and Surrounding Land Uses

SOURCES: Google Earth, 3/26/18; LSA, 2020

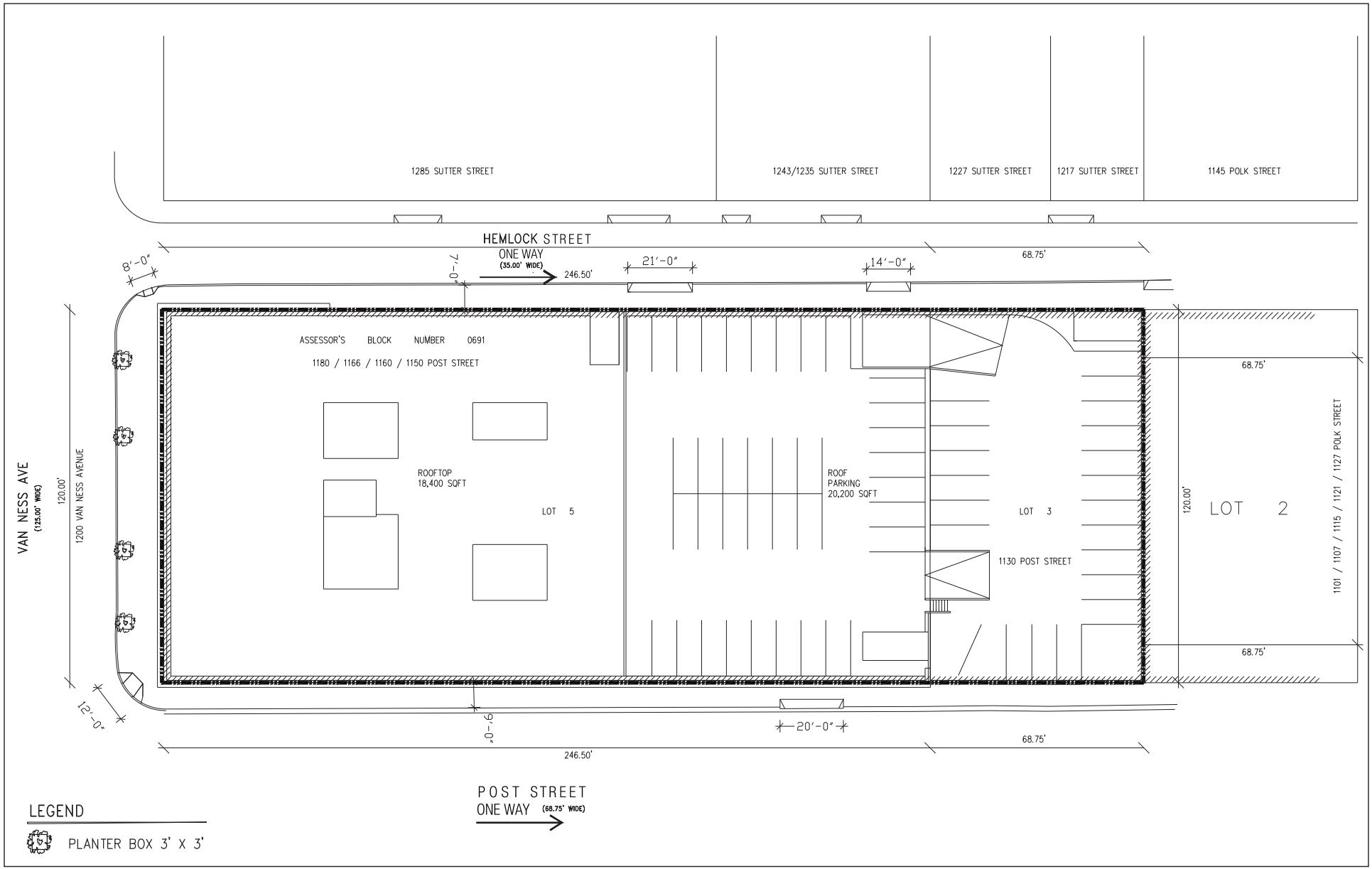



**FIGURE 3**

N

NOT TO SCALE

Project Boundary

SOURCE: Woods Bagot, 2021

*1200 Van Ness Avenue Project*
Existing Site Plan

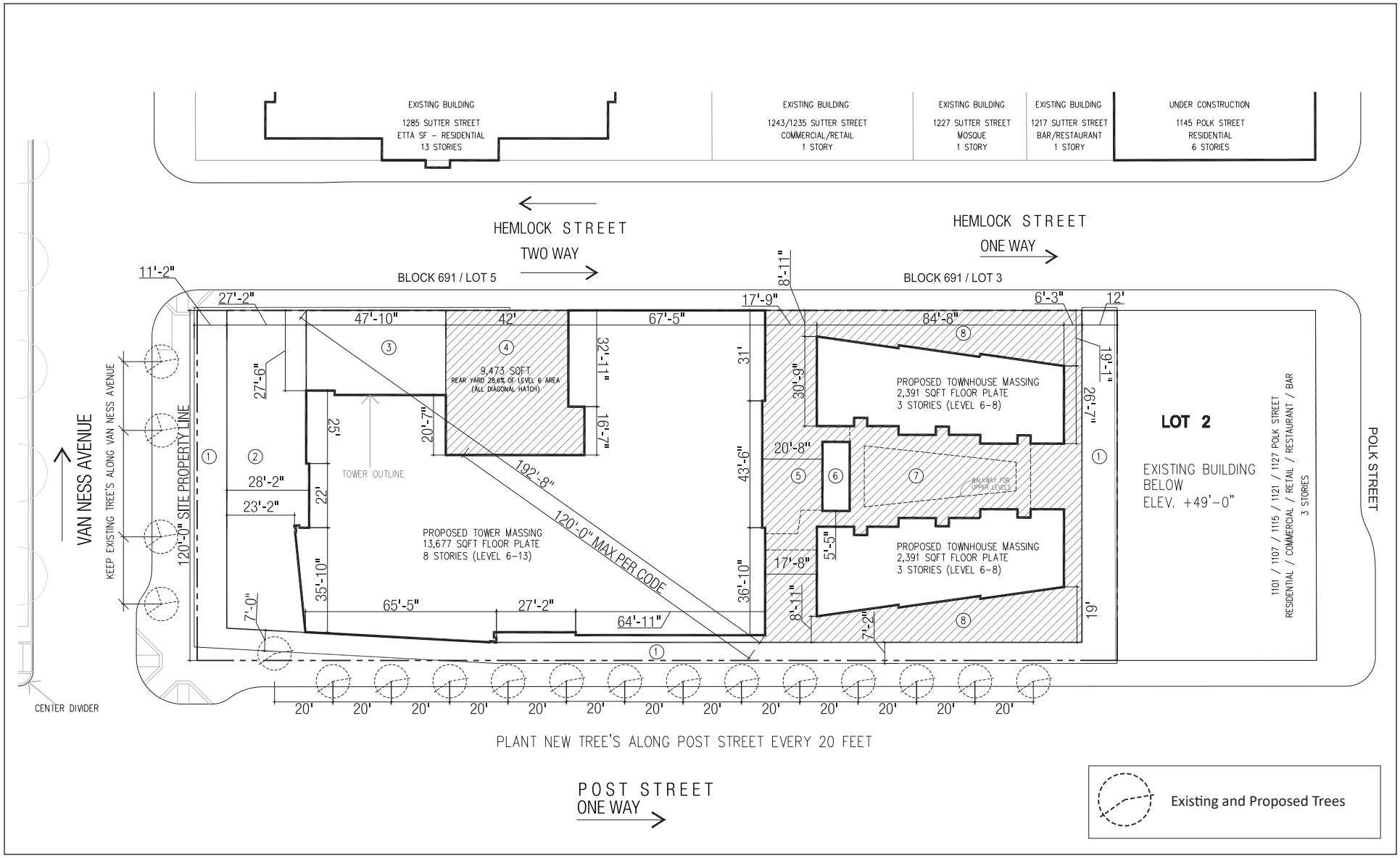



**FIGURE 4**

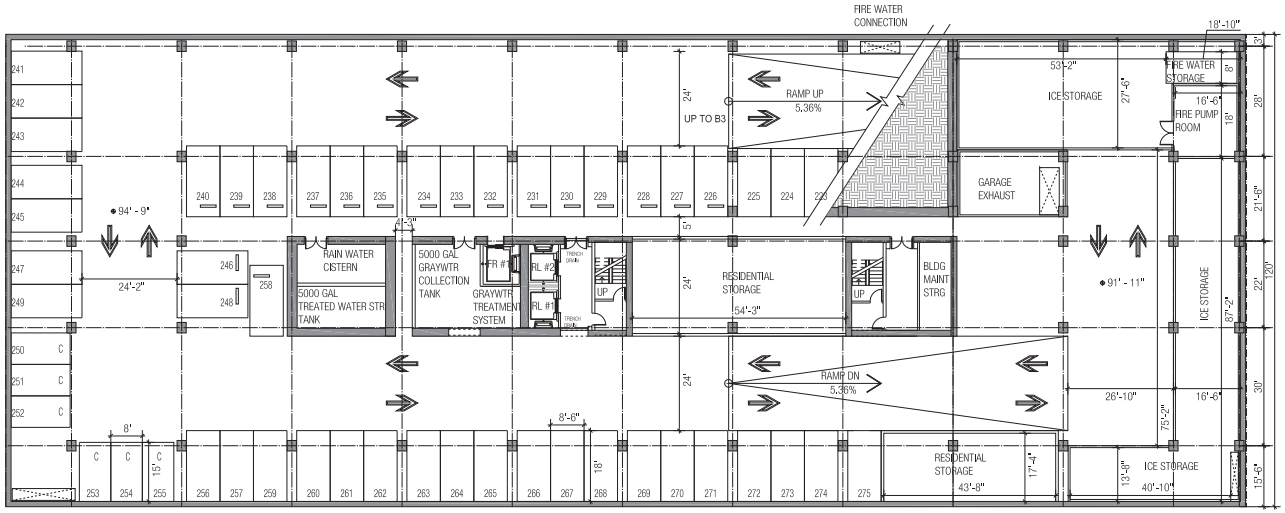
NOT TO SCALE

SOURCE: WOODS BAGOT, 8/19/2020

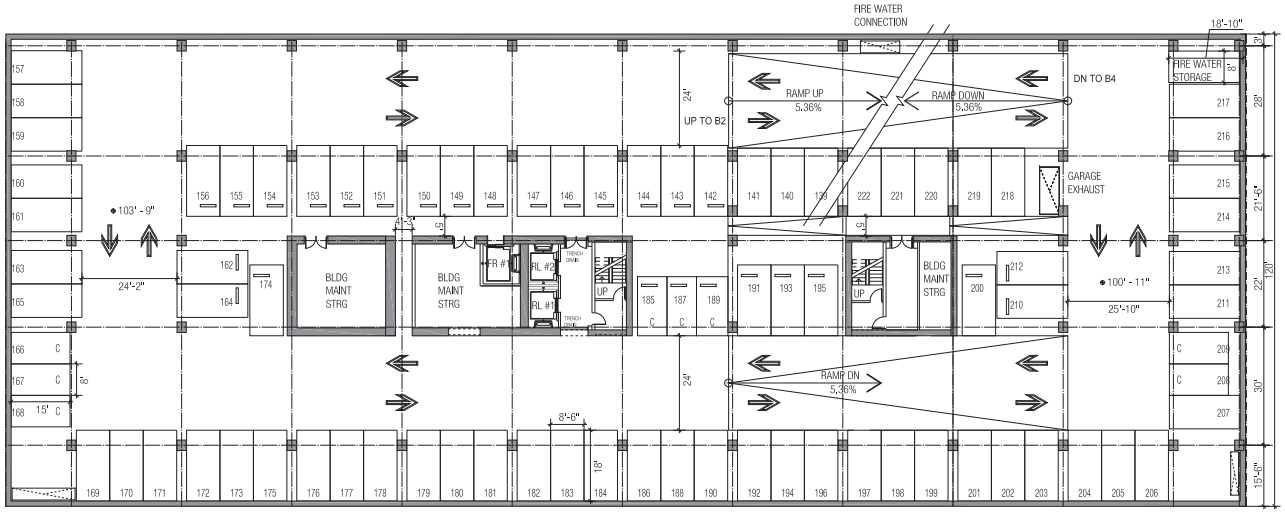
*1200 Van Ness Avenue Project*
Proposed Site Plan

LEGEND

CS - CAR SHARE
EV ADA - ELECTRIC VEHICLE (ACCESSIBLE)
EV - ELECTRIC VEHICLE
AS - ACCESSIBLE SPACE
AS VAN - ACCESSIBLE SPACE FOR VAN
CP - COMPACT PARKING
RP - REGULAR PARKING




FLOOR PLAN LEVEL B4




FLOOR PLAN LEVEL B3

**FIGURE 5**

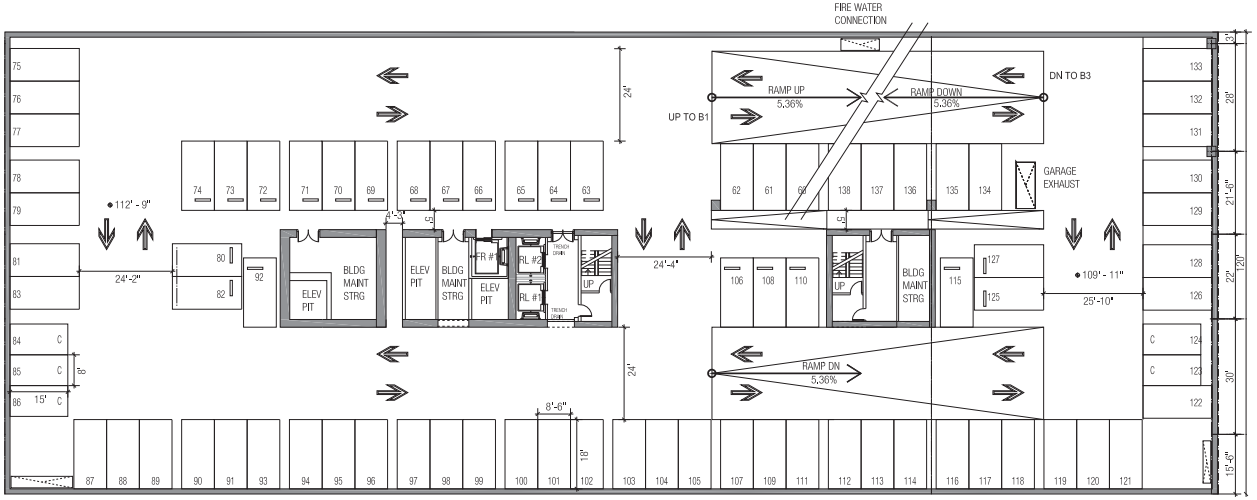
NOT TO SCALE

SOURCE: WOODS BAGOT, 8/19/2020

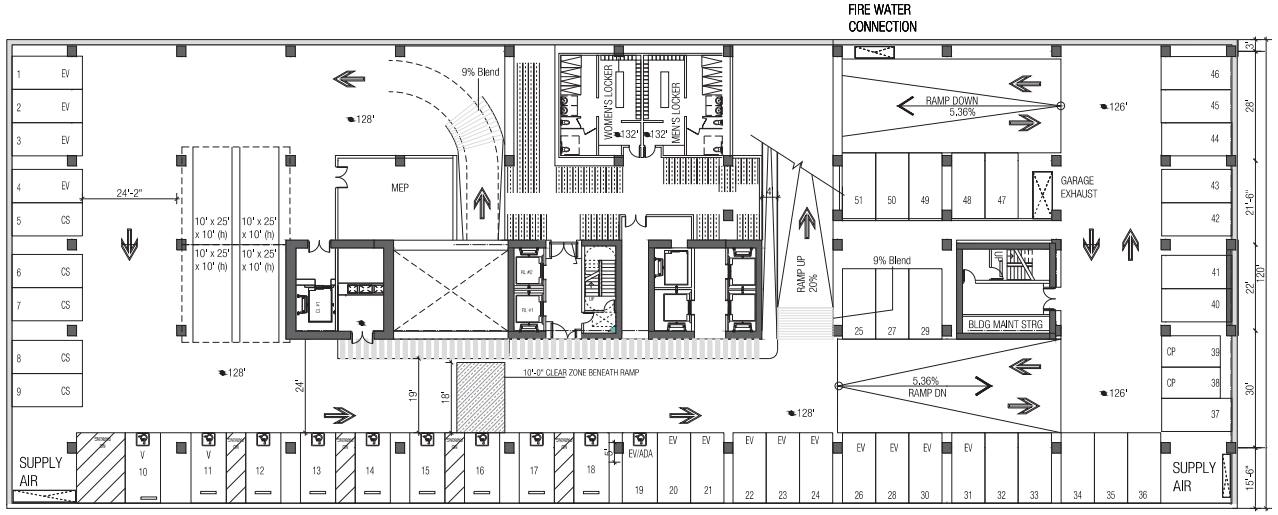
*1200 Van Ness Avenue Project*
Proposed Floor Plans - Levels B4 and B3

LEGEND

CS - CAR SHARE
EV ADA - ELECTRIC VEHICLE (ACCESSIBLE)
EV - ELECTRIC VEHICLE
AS - ACCESSIBLE SPACE
AS VAN - ACCESSIBLE SPACE FOR VAN
CP - COMPACT PARKING
RP - REGULAR PARKING




FLOOR PLAN LEVEL B2




FLOOR PLAN LEVEL B1

**FIGURE 6**

NOT TO SCALE

SOURCES: WOODS BAGOT, 8/19/20; 4/20/2021

*1200 Van Ness Avenue Project*
Proposed Floor Plans - Levels B2 and B1

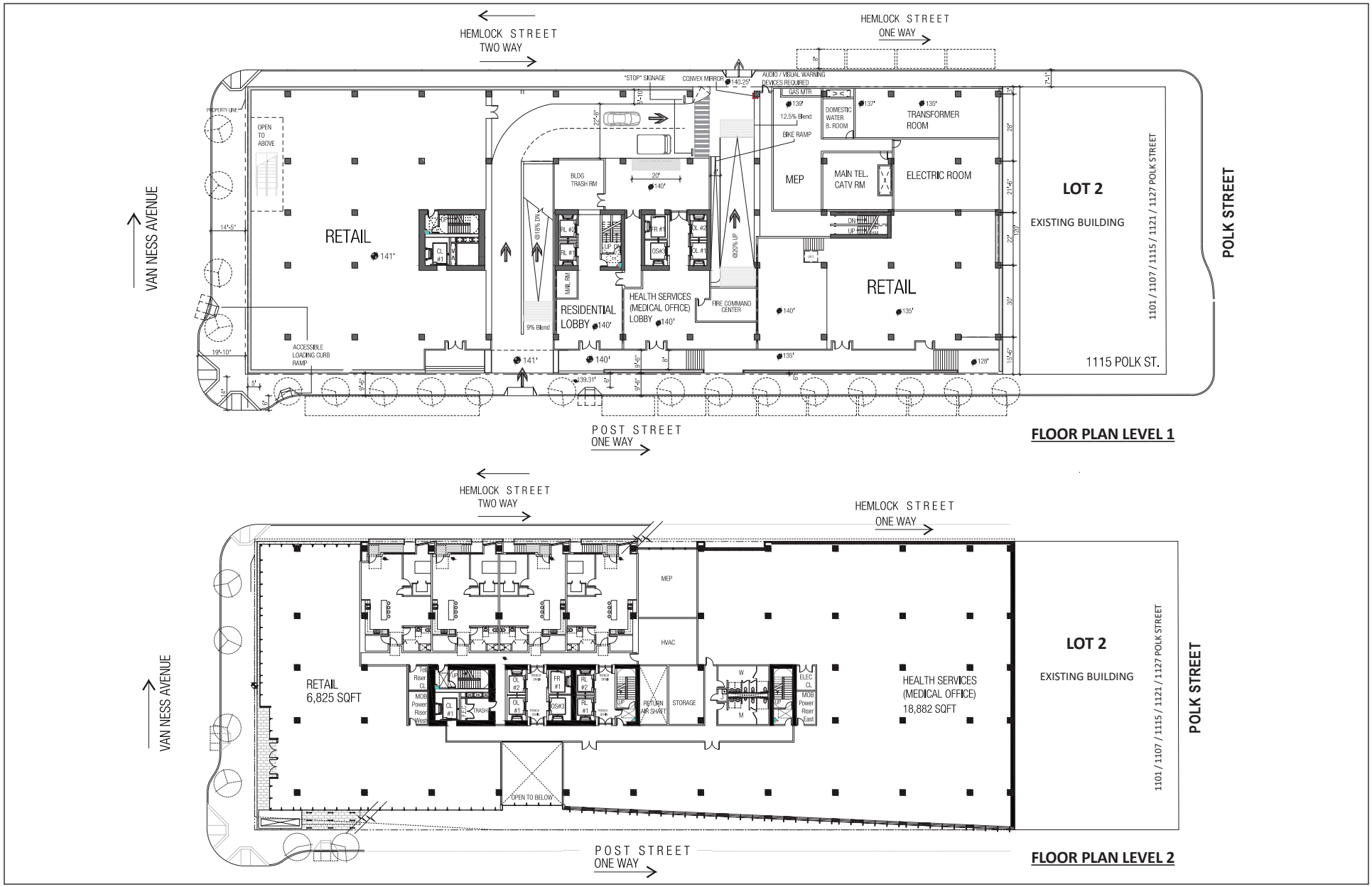



**FIGURE 7**

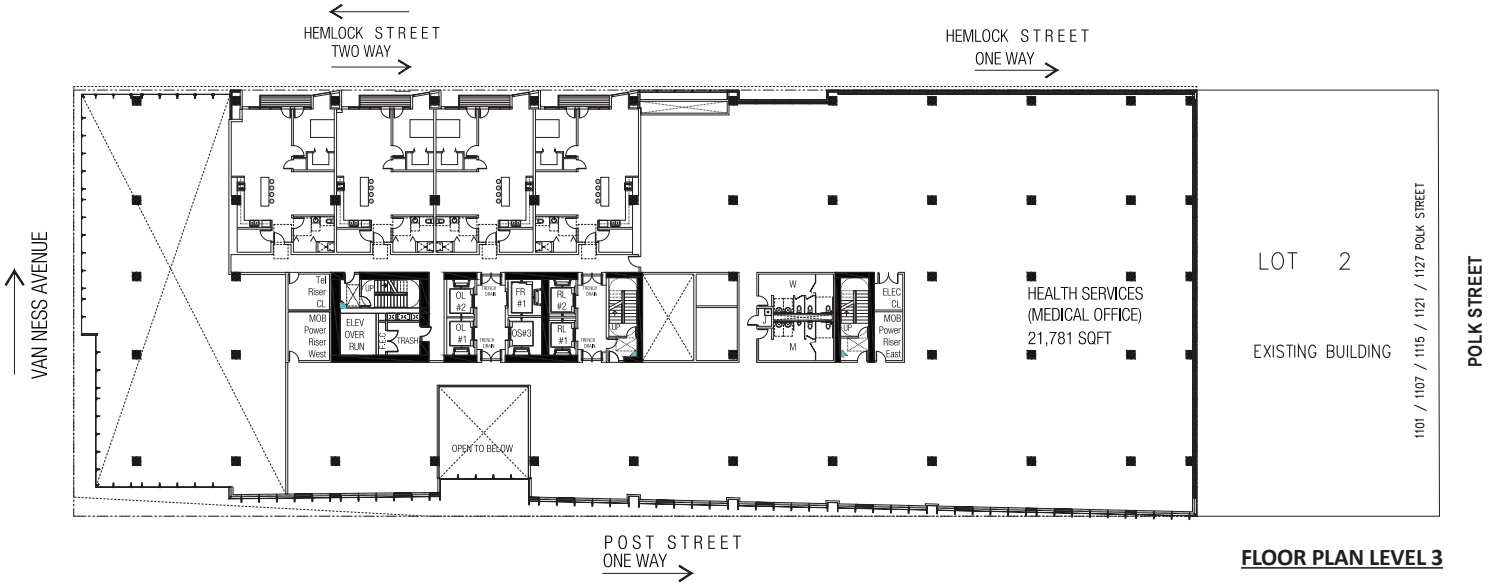
NOT TO SCALE

Existing and Proposed Trees

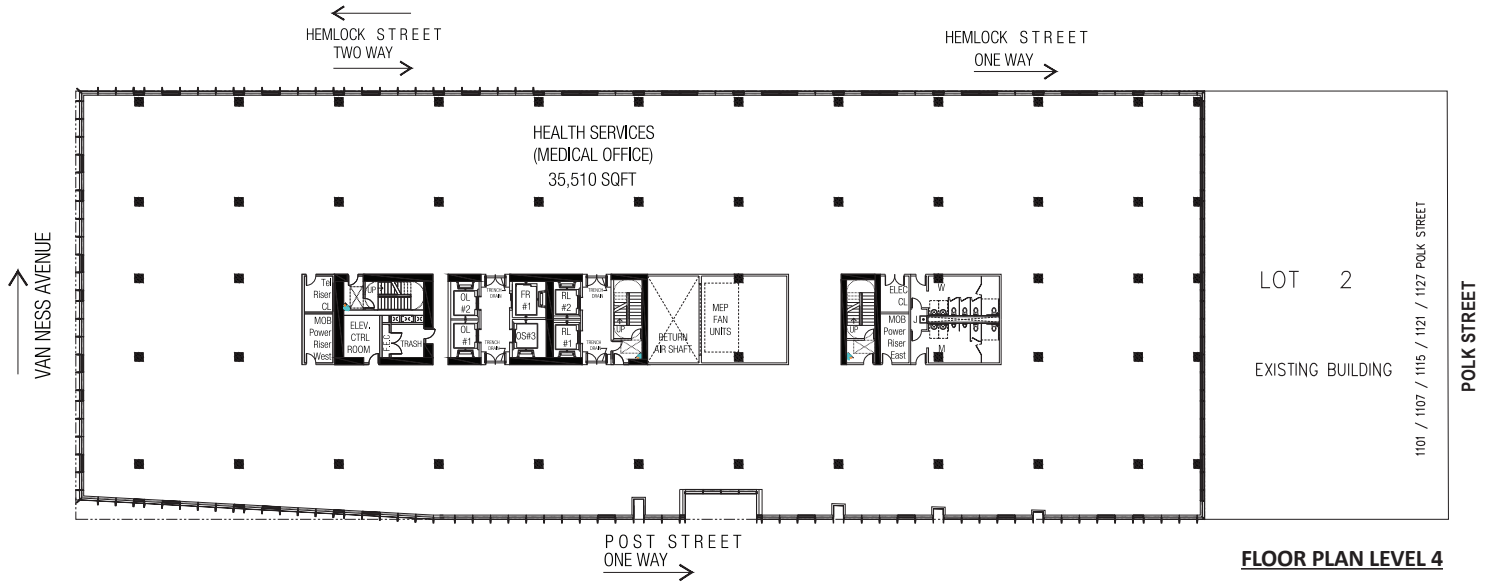
SOURCE: WOODS BAGOT, 8/19/2020; 4/20/21

*1200 Van Ness Avenue Project*

Proposed Floor Plans - Levels 1 and 2




**FLOOR PLAN LEVEL 3**




**FLOOR PLAN LEVEL 4**

**FIGURE 8**

NOT TO SCALE

SOURCE: WOODS BAGOT, 8/19/2020

*1200 Van Ness Avenue Project*

Proposed Floor Plans - Levels 3 and 4

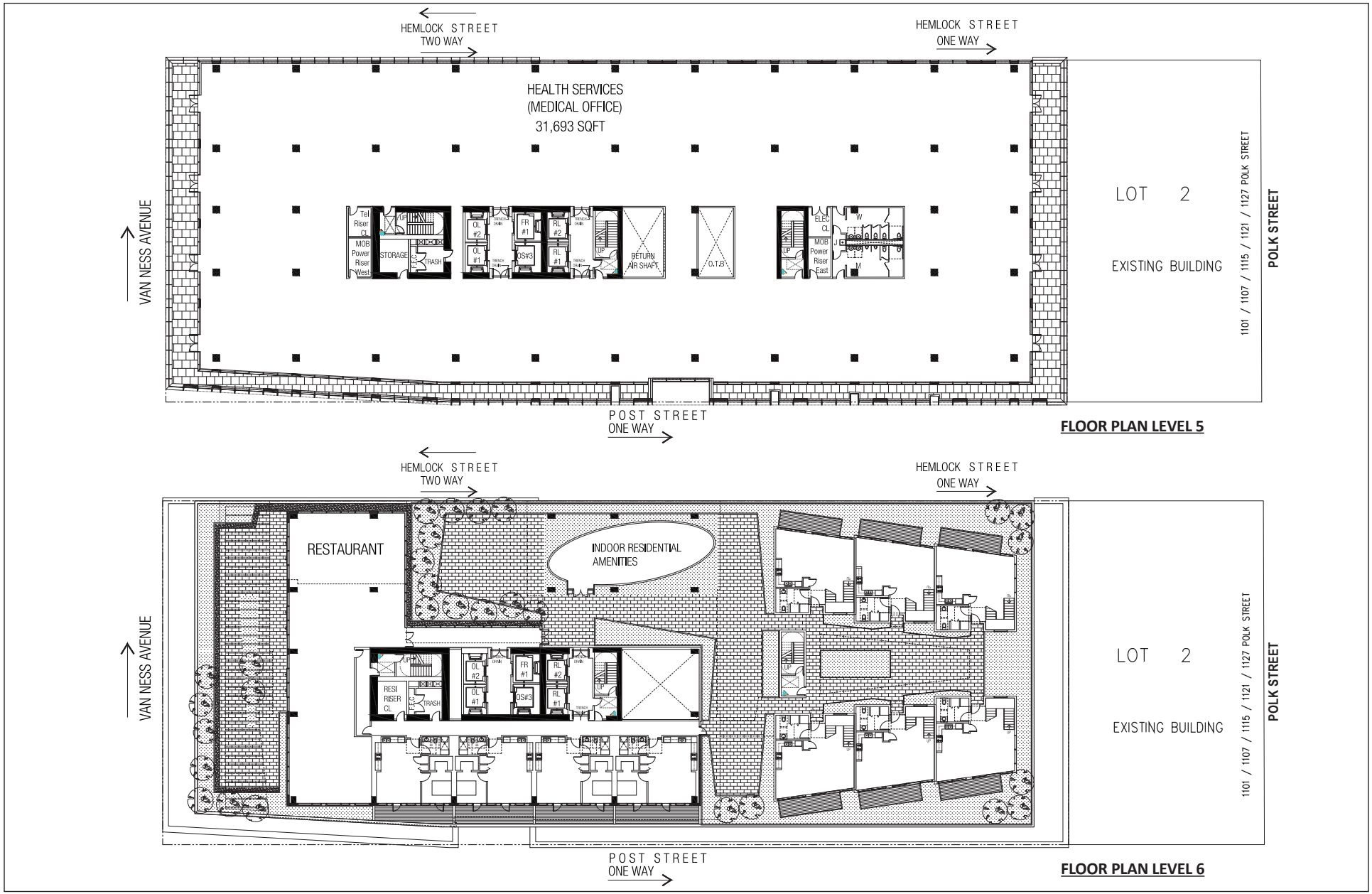



**FIGURE 9**

NOT TO SCALE

Landscaping

SOURCE: WOODS BAGOT, 8/19/2020

*1200 Van Ness Avenue Project*
Proposed Floor Plans - Levels 5 and 6


**FIGURE 10**

N

NOT TO SCALE

Landscaping

SOURCE: WOODS BAGOT, 8/19/2020

*1200 Van Ness Avenue Project*

Proposed Floor Plans - Levels 7 and 8


**FIGURE 11**

NOT TO SCALE

SOURCE: WOODS BAGOT, 8/19/2020

*1200 Van Ness Avenue Project*

Proposed Floor Plans - Levels 9 through 13

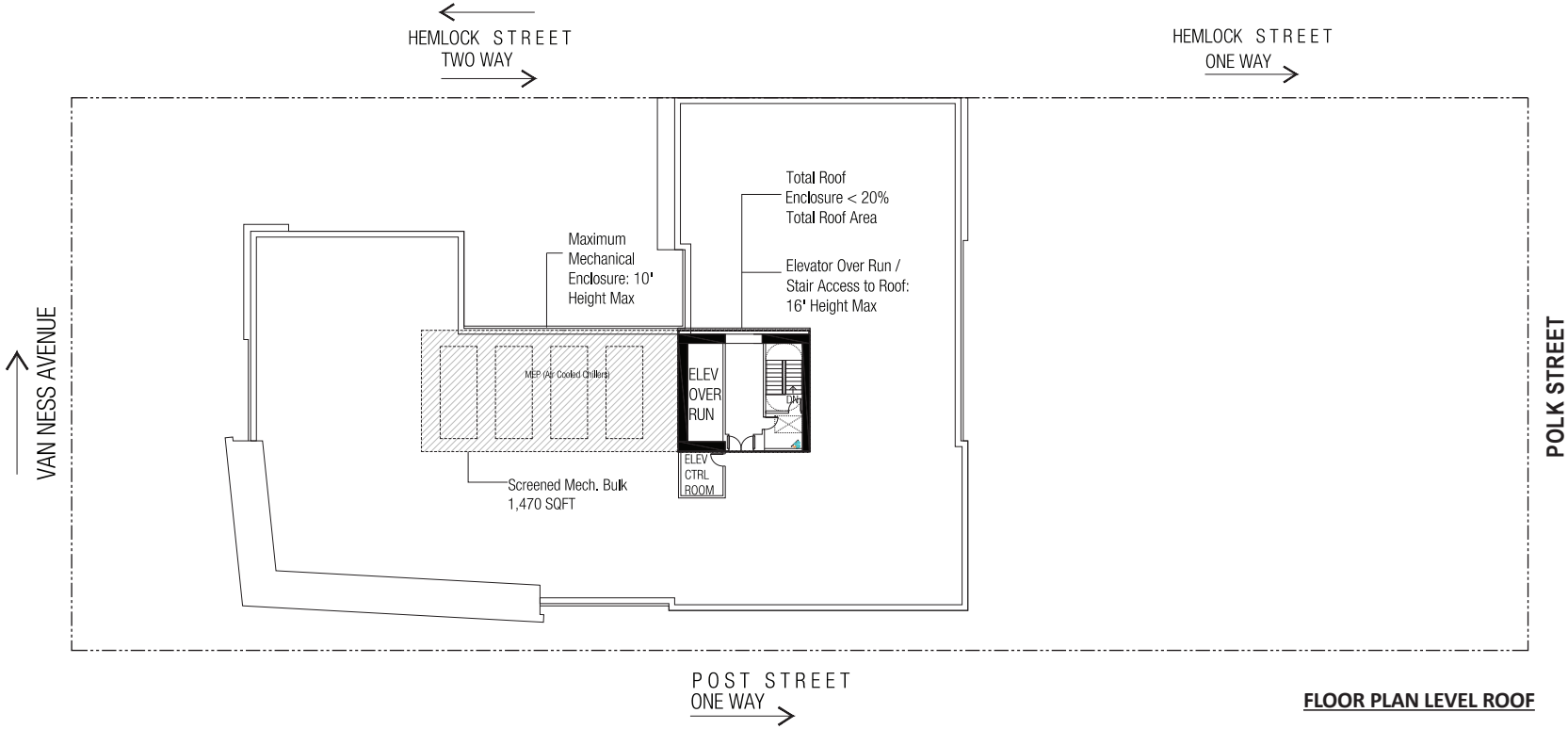



**FIGURE 12**

NOT TO SCALE

SOURCE: WOODS BAGOT, 8/19/2020

*1200 Van Ness Avenue Project*
Proposed Roof Plan

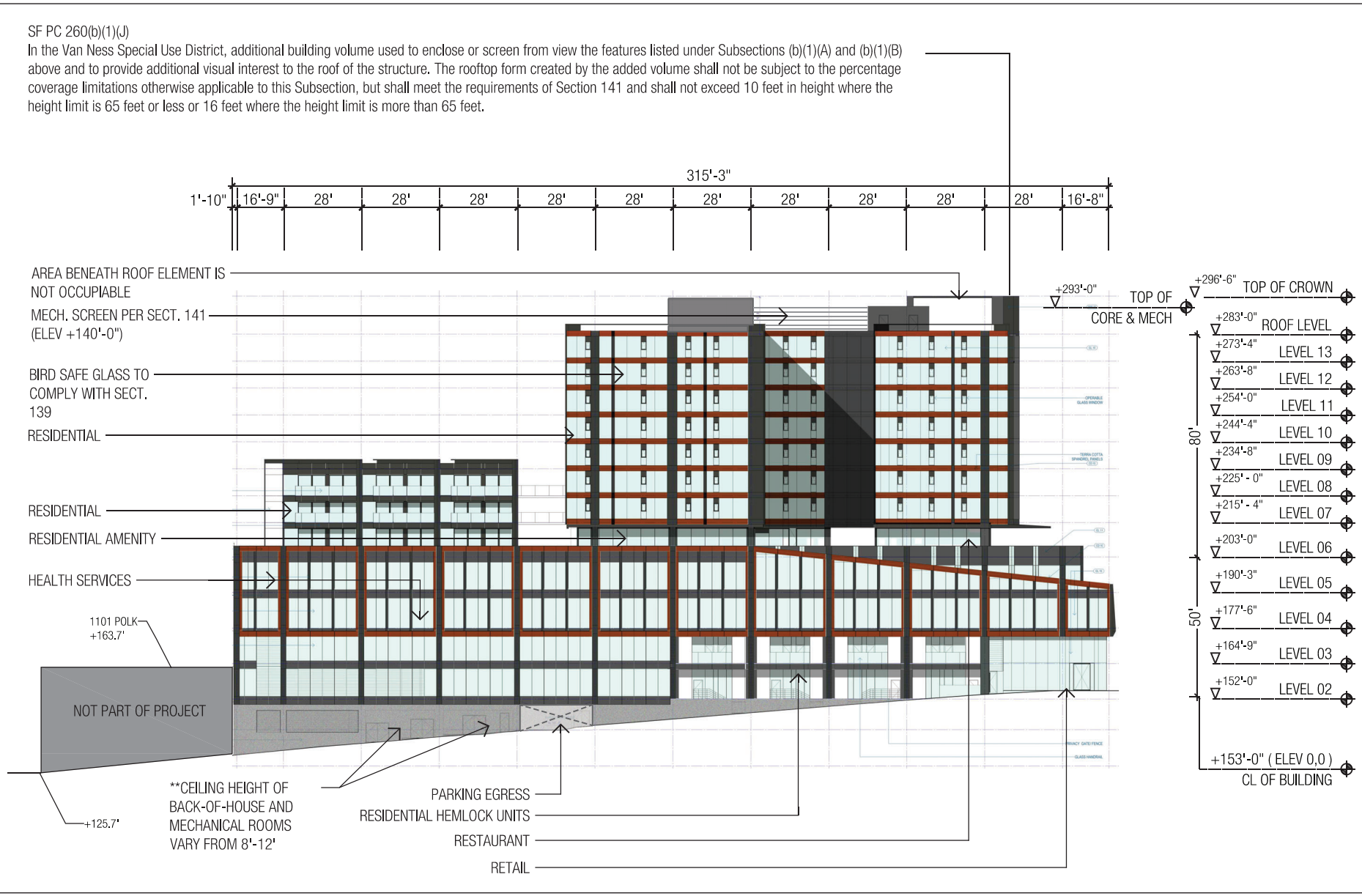



**FIGURE 13**

NOT TO SCALE

SOURCE: WOODS BAGOT, 2021

*1200 Van Ness Avenue Project*
Proposed North (Hemlock Street) Building Elevation

SF PC 260(b)(1)(J)
In the Van Ness Special Use District, additional building volume used to enclose or screen from view the features listed under Subsections (b)(1)(A) and (b)(1)(B) above and to provide additional visual interest to the roof of the structure. The rooftop form created by the added volume shall not be subject to the percentage coverage limitations otherwise applicable to this Subsection, but shall meet the requirements of Section 141 and shall not exceed 10 feet in height where the height limit is 65 feet or less or 16 feet where the height limit is more than 65 feet.

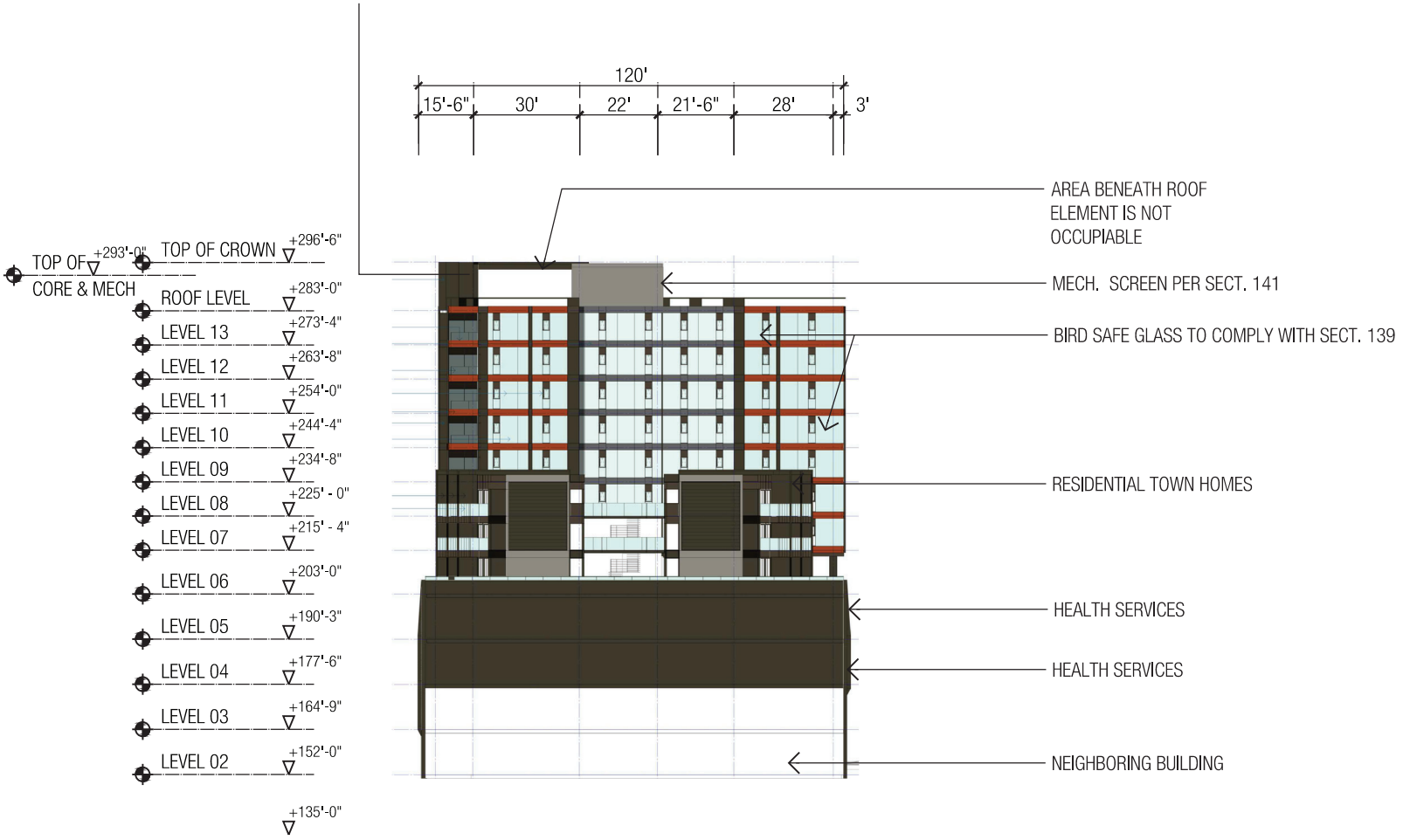



**FIGURE 14**

NOT TO SCALE

SOURCE: WOODS BAGOT, 2021

*1200 Van Ness Avenue Project*
Proposed East (Polk Street) Building Elevation

SF PC 260(b)(1)(J)
In the Van Ness Special Use District, additional building volume used to enclose or screen from view the features listed under Subsections (b)(1)(A) and (b)(1)(B) above and to provide additional visual interest to the roof of the structure. The rooftop form created by the added volume shall not be subject to the percentage coverage limitations otherwise applicable to this Subsection, but shall meet the requirements of Section 141 and shall not exceed 10 feet in height where the height limit is 65 feet or less or 16 feet where the height limit is more than 65 feet.

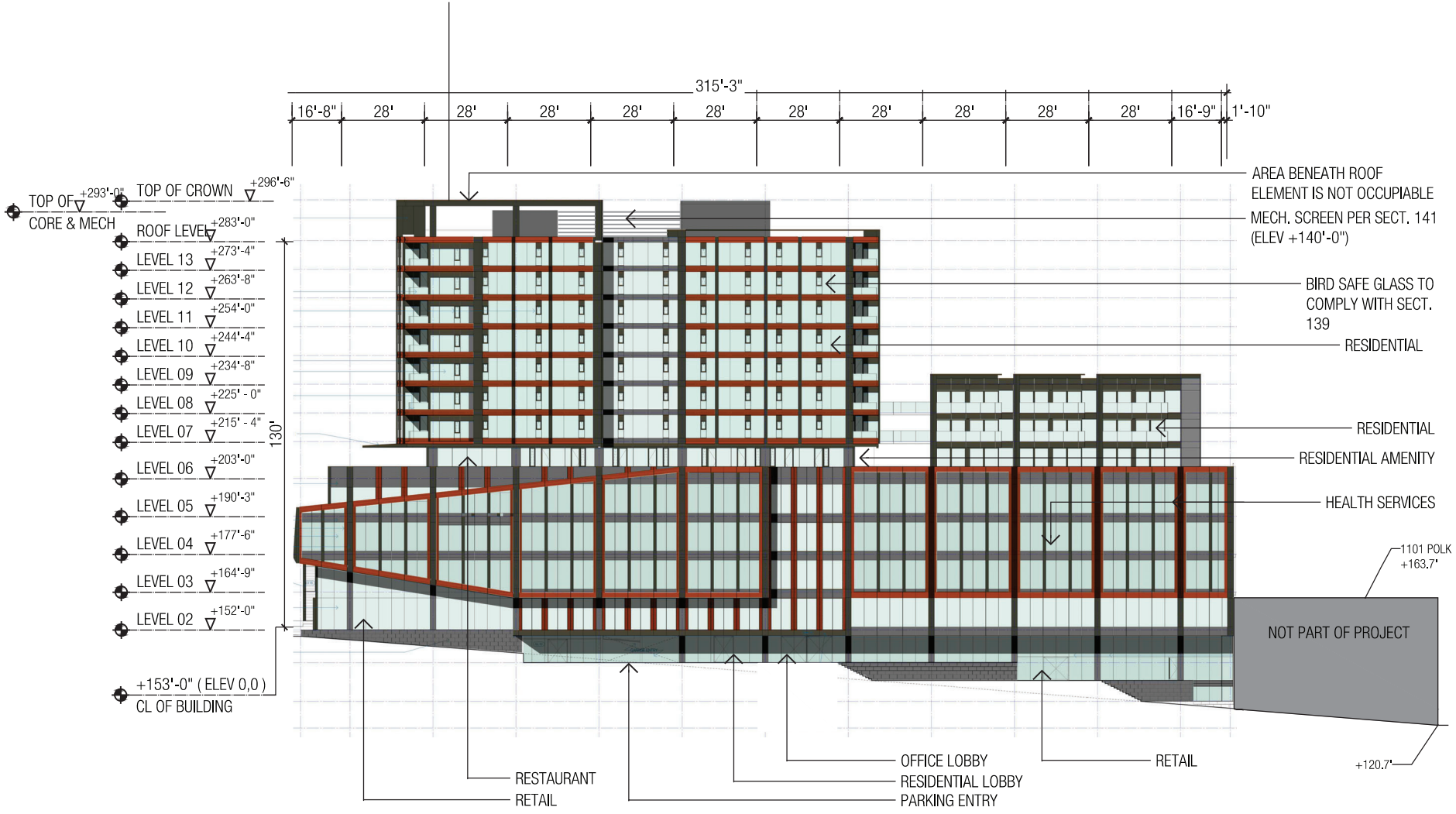



**FIGURE 15**

NOT TO SCALE

SOURCE: WOODS BAGOT, 2021

*1200 Van Ness Avenue Project*
Proposed South (Post Street) Building Elevation

SF PC 260(b)(1)(J)
In the Van Ness Special Use District, additional building volume used to enclose or screen from view the features listed under Subsections (b)(1)(A) and (b)(1)(B) above and to provide additional visual interest to the roof of the structure. The rooftop form created by the added volume shall not be subject to the percentage coverage limitations otherwise applicable to this Subsection, but shall meet the requirements of Section 141 and shall not exceed 10 feet in height where the height limit is 65 feet or less or 16 feet where the height limit is more than 65 feet.

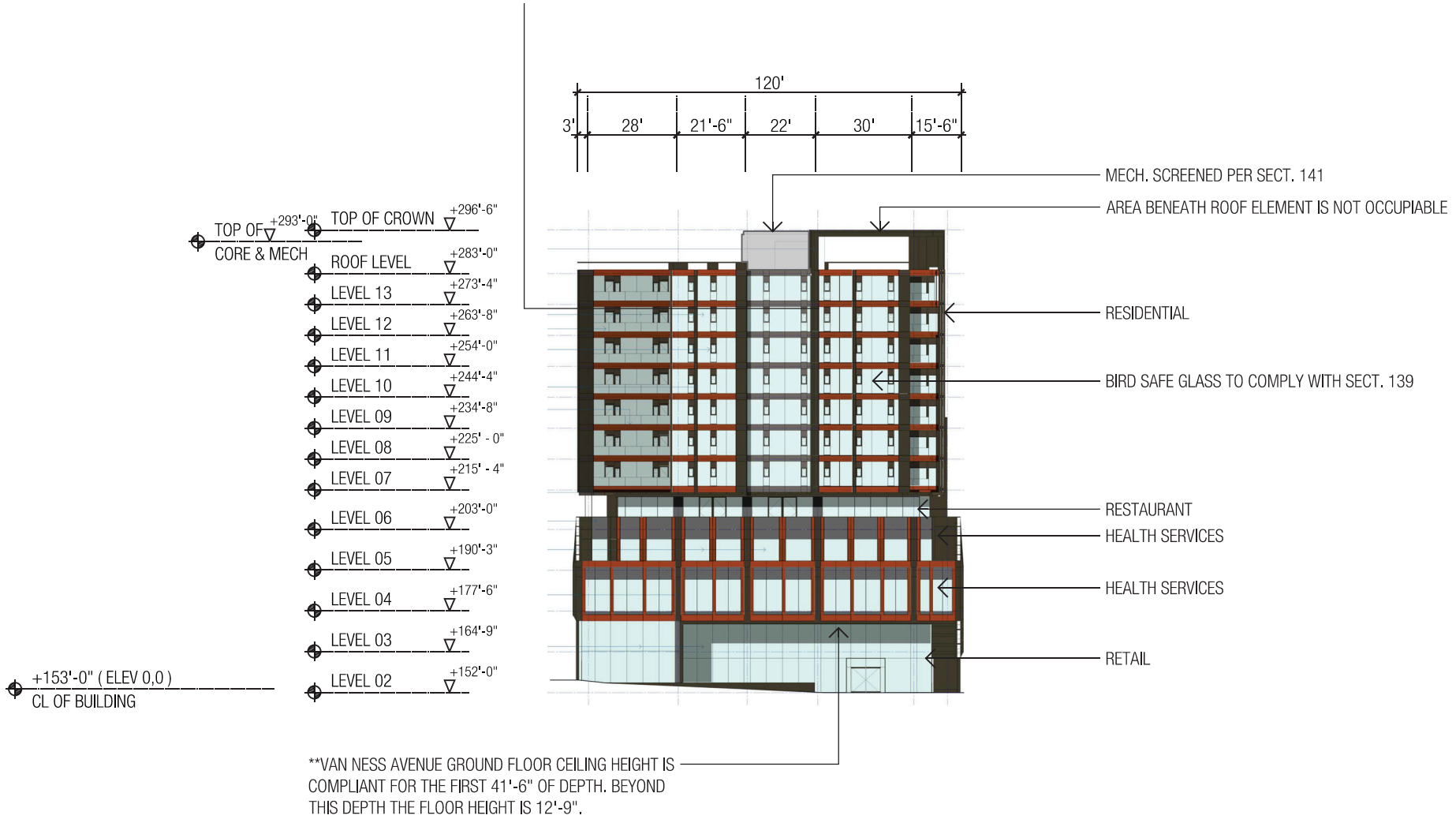



**FIGURE 16**

NOT TO SCALE

SOURCE: WOODS BAGOT, 2021

*1200 Van Ness Avenue Project*
Proposed West (Van Ness Avenue) Building Elevation

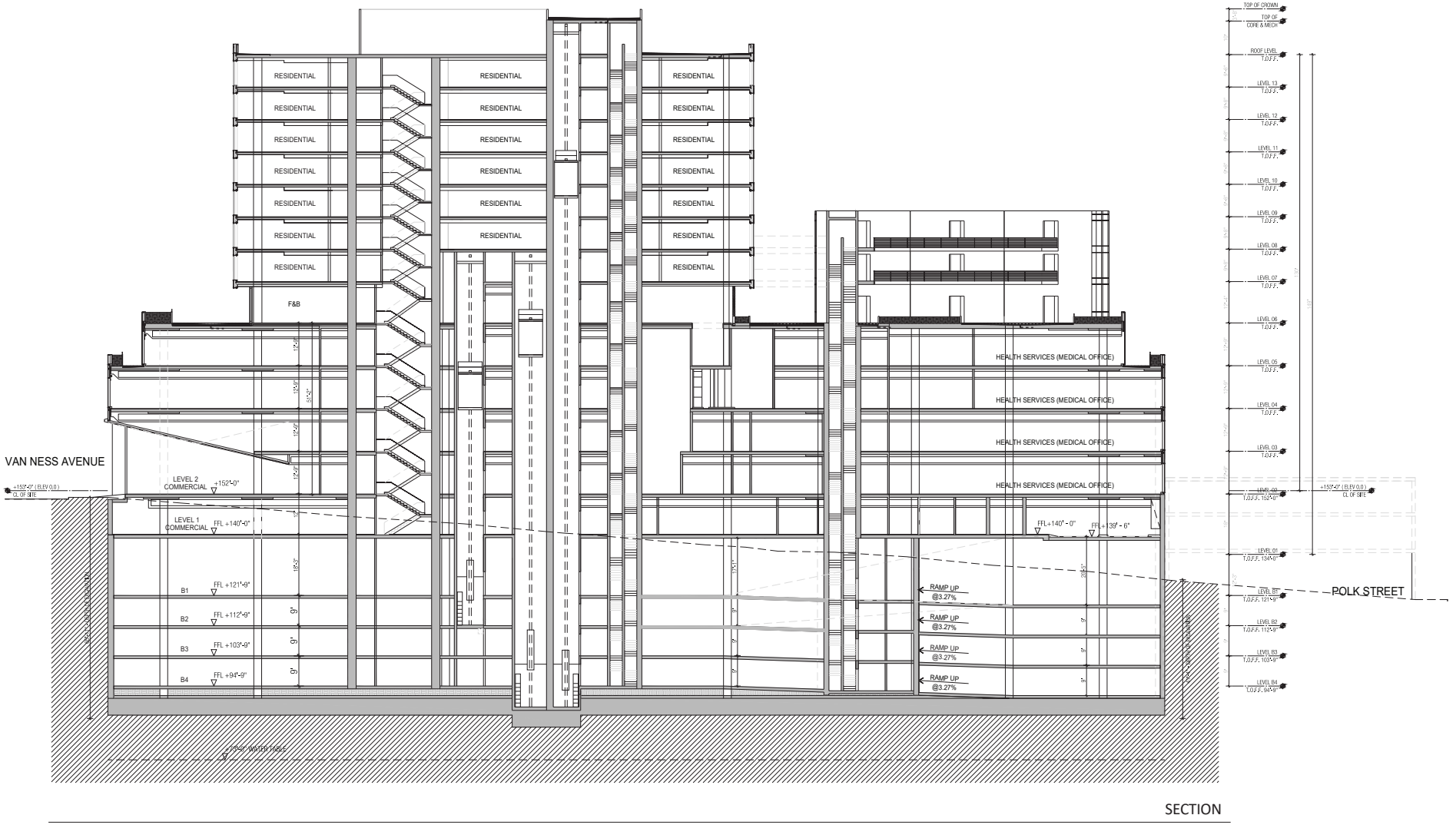



**FIGURE 17**

NOT TO SCALE

SOURCE: WOODS BAGOT, 8/19/2020

*1200 Van Ness Avenue Project*
Proposed Building Section

The proposed building would consist of a five-story above-ground podium that would be built to the property lines along the Van Ness Avenue and Post and Hemlock street frontages. Due to the sloped site topography, both the first and second floors of the five-story podium would be located at ground (street) level. (The first floor would front Post and Hemlock streets, while the second floor would front Van Ness Avenue.) An eight-story residential tower and two three-story townhome-style structures would extend above the top of the fifth level podium.

The health service space would be primarily located throughout the second through fifth floors, with an approximately 1,432-gross-square-foot (gsf) lobby and elevator space on the first floor. Approximately 16,912 gsf of retail space would be located on the first floor (i.e., ground level of Post Street), and 7,392 gsf of retail space would be located on the second floor (i.e., ground level of Van Ness Avenue). The restaurant space and residential amenities would be located at the fifth level podium roof/first floor of the residential tower (sixth floor of the building). The tower would be stepped back between approximately 33 and 38 feet from the Van Ness Avenue street frontage and above the western portion of the fifth level podium. Residential open space and the townhomes would occupy the eastern portion of the podium.

A total of 59 one-bedroom units and 48 two-bedroom units would be distributed throughout the building, with the majority located within the residential tower and townhome structures. The second and third floors of the tower (levels seven and eight) would each include four one-bedroom units. The residential tower beginning on the sixth floor of the building would include between 10 and 18 one- and two-bedroom units on each floor. The one-bedroom units would range in size from approximately 540 to 859 square feet, the two-bedroom units would range from 946 to 1,185 square feet, and the townhouse units would be about 1,600 square feet in size.

The proposed project would include two emergency generators that would be fully enclosed within level 1 of the proposed building and would include exhaust silencers.

**OPEN SPACE AND LANDSCAPING**

Useable residential open space would consist of both private and common open space. Private open space would consist of patios and decks for certain residential units and common open space would consist of a garden space on the sixth-floor podium level. Common open space would be available to building residents only. Additionally, the proposed project would include approximately 1,000 square feet of indoor residential amenity space on the sixth-floor podium level.

Landscaping on the project site would consist of the installation of 14 street trees along the Post Street frontage. The existing four street trees along Van Ness Avenue would be retained, and therefore a total of 18 street trees would surround the project site. The project would comply with public works code requirements regarding street tree plantings and/or payment of in-lieu fee amounts where street tree planting is determined to be infeasible, such as along Hemlock Street where street tree plantings would obstruct sidewalk pathways, conflicting with city accessibility standards.

**ACCESS, PARKING, AND LOADING**

The primary entrances for the health service and residential uses would be on Post Street (except for the dwelling units directly and independently accessible from Hemlock Street). The discrete retail spaces would be accessed from Van Ness Avenue and Post Street.

The proposed project would include a four-level, below-grade parking garage (depth of approximately 68 feet, 5 inches feet below the Van Ness Avenue grade and 44 feet below the Polk Street grade) containing a total of 275 parking spaces. Each level would contain between 53 and 84 parking spaces (see Figures 5 and 6, pp. 7 and 8). Of the 275 parking spaces, 217 would be accessory to the health service uses and the remaining 53 would be for residents. Five of the 275 parking spaces would be car share spaces as required by the planning code. A total of 127 class 1 bicycle parking spaces and 26 class 2 bicycle parking spaces would be provided, as required by the planning code.[2] Four service vehicle-sized spaces would be located within the first basement level for freight loading.

Vehicular access into the parking garage is proposed to be provided from Post Street, and would consist of a two-lane, one-way driveway generally at the center of the site. The eastern lane would lead to the subsurface parking garage via a downward parking ramp, and the western lane would be dedicated to passenger drop-off and pick-up. All vehicles would exit via a single-lane, exit-only driveway on Hemlock Street. (see Figure 4, p. 6). In addition, the proposed project would include the following transportation-related public right-of-way improvements:

- Hemlock Street west of the proposed garage exit (i.e., between Van Ness Avenue and the garage exit) would be converted to a two-way street, adding a westbound direction, while Hemlock Street between the proposed garage exit and Polk Street would remain one-way eastbound.
- On-street parking on the south side of Hemlock Street between Van Ness Avenue and the project garage exit would be removed.
- At the approach of eastbound Hemlock Street to Polk Street, left turns onto Polk Street would be prohibited.

Additional public right-of-way improvements, including loading, sidewalks, and signage, are further described in Section E.5, Transportation. The project sponsor would also prepare and implement a loading operations plan, as outlined below, which would address the operational and physical aspects of residential and commercial tenant loading, deliveries, and access, as well as wayfinding signage.

***Loading Operations Plan.*** A loading operations plan would be prepared and submitted as part of the application for the first temporary certificate of occupancy, and would consist of the following:

- A schematic diagram of the location of the on-site and on-street freight and passenger loading facilities serving the project site. The schematic diagram will include information regarding hours of operation, restricted hours, number of spaces, and meter information.
- A plan to make the schematic diagram available for residents, retail, restaurant and health service tenants, and drivers of loading vehicles serving the site.

[2] Class 1 bicycle parking spaces are spaces in secure, weather-protected facilities conveniently accessible from ground level intended for use as long-term, overnight, and work-day bicycle storage. Class 2 bicycle parking spaces are spaces located in a publicly accessible, highly visible location intended for transient or short-term use. The planning code sets forth standards for dimensions, location, and type of class 1 and class 2 bicycle parking required.

- A memorialized procedure to notify retail, restaurant, and health service tenants of on-site loading access restrictions for trucks larger than 23 feet in length.

- Evidence of installation and maintenance of inter-building wayfinding signage for pedestrians and bicyclists to access building ingresses and egresses, as well as the building's class 1 bicycle parking facilities (i.e., any class 1 bicycle parking facilities required by the planning code or the project's transportation demand management plan).

- A plan to coordinate and schedule deliveries with retail, restaurant, and health service tenants, to the extent feasible.

- A plan to coordinate with postal, package, and other delivery services to identify protocols for on-site deliveries, if required, and on-street loading spaces available for deliveries.

- A memorialized procedure to notify residential tenants of move-in/move-out procedures and of restricted truck access to on-site loading spaces for move-in/move-out and large deliveries (e.g., furniture, equipment).

- For residential move-in/move-out activities that involve loading vehicles larger than 23 feet in length, a written process by which building management or the delivery company personnel will obtain a reserved curbside permit for Hemlock Street or Post Street on-street commercial loading spaces from the SFMTA in advance. To the extent feasible, these activities will be scheduled on weekends and weekdays during non-peak hours (e.g., between a.m. and p.m. peak traffic periods[3] or after 7 p.m.)

#### DEMOLITION AND CONSTRUCTION

Construction of the proposed project would occur over an approximately 25-month period and would consist of the following partially overlapping phases: (1) demolition; (2) excavation and shoring; (3) foundation and below-grade construction; (4) base building installation; (5) exterior finishing; and (6) interior finishing. The proposed project would be constructed on a reinforced concrete mat under the shear walls and adjacent columns, spread footings under the gravity columns, and a continuous footing under the basement walls. No impact or vibratory pile driving techniques would be used. The proposed project would require excavation of approximately 79,000 cubic yards of soils to a depth of approximately 68 feet, 5 inches below Van Ness Avenue and 44 feet below Polk Street to accommodate the four-level below-grade parking garage, foundations, and elevator pits. Most construction would occur during daytime hours, but some nighttime construction may occur. During the construction phase, nighttime construction work may include the following activities:

- 10 consecutive days of overnight work for exterior skin erection and utility trench work;
- 15 nonconsecutive early mornings (before 7 a.m.) for delivery of oversize equipment; and
- Two mat pours, likely five to seven days apart, which would be approximately 20 hours in duration.

## Project Approvals

The proposed project is anticipated to require the following approvals:

[3] The a.m. peak traffic period is generally between 7 a.m. and 9 a.m. and the p.m. peak period is generally between 4:30 and 6:30 p.m.

**PLANNING COMMISSION**

- Conditional use authorization for:
  - Retail sales and service uses on the second floor or above in the RC-4 district (section 209.3 of the planning code)
  - Non-residential use size at 6,000 square feet or larger in the RC district (section 209.3 of the planning code)
  - Non-residential to residential ratio in the Van Ness Special Use District (SUD) (section 243 of the planning code)
  - Review of buildings greater than 50 feet in height in the RC district and the Van Ness SUD (sections 253 and 253.2 of the planning code)
  - Bulk limit exceptions for both the diagonal and horizontal dimensional measurements (section 271 of the planning code)
  - Planned unit development (PUD), including PUD modifications for:
    - Rear yard (section 134 of the planning code)
    - Ground floor ceiling height less than 14 feet as measured from grade due to sloped nature of the site (section 145.1 of the planning code)
    - Off-street freight loading technical standards for loading space dimensions and vertical clearance due to sloped nature of site (section 154 of the planning code)
    - Common open space technical standards (section 135 of the planning code)
    - Dwelling unit exposure standards for 13 dwelling units (section 140 of the planning code)
    - Floor area ratio (sections 124 and 243(c)(1) of the planning code)

**SAN FRANCISCO PLANNING DEPARTMENT**

- Health care services master plan consistency determination (section 342 of the planning code)

**SAN FRANCISCO DEPARTMENT OF BUILDING INSPECTION**

- Approval of a demolition permit
- Approval of a new construction permit

**SAN FRANCISCO DEPARTMENT OF PUBLIC HEALTH**

- Approval of site mitigation plan and final project report or no further action letter in compliance with San Francisco Health Code article 22A (Maher Ordinance)

- Construction dust control plan in compliance with health code article 22B (Construction Dust Control Ordinance)

**SAN FRANCISCO DEPARTMENT OF PUBLIC WORKS**

- Approval of erosion and sediment control plan (section 146.7 of the public works code)
- Approval of street improvement permits
- Approval of street tree permit
- Approval of nighttime construction permit (section 2908 of the police code)

**SAN FRANCISCO MUNICIPAL TRANSPORTATION AGENCY**

- Approval of the Hemlock Street change to two way west of the building exit
- Approval of left turn restriction from Hemlock Street to Polk Street
- Approval of changes to existing curb striping
- Construction-related approvals, as applicable

**SAN FRANCISCO PUBLIC UTILITIES COMMISSION**

- Approval of discharge permit for construction-period dewatering and discharge to the combined sewer system

**CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS)**

- Approval of encroachment permit(s) and possible transportation management plan for construction-related temporary parking and travel lane closures on Van Ness Avenue

**ACTIONS BY OTHER GOVERNMENT AGENCIES**

Approval of any necessary air quality permits for installation, operation, and testing (e.g., Authority to Construct/Permit to Operate) of individual air pollutant sources, such as the proposed emergency backup generators and any necessary boilers (Bay Area Air Quality Management District)

### Approval Action

Approval of the conditional use authorization for a planned unit development by the planning commission would constitute the Approval Action for the proposed project. The Approval Action date establishes the start of the 30-day period for the appeal of the final mitigated negative declaration to the board of supervisors pursuant to section 31.04(h) of the San Francisco Administrative Code.

## B. Project Setting

The topography in the immediate vicinity is similar to that of the project site, generally sloping upward from southeast to northwest. The project site is located along the Van Ness Avenue corridor and is within the immediate vicinity of the California Pacific Medical Center complex and the Van Ness Medical Use Subdistrict. Land uses in the surrounding area include a mixture of healthcare, commercial, hotel,

residential, and retail including shopping and restaurants. Within the block occupied by the project site is a three-story mixed-use building located immediately east of the property line with residential uses above ground floor retail (1107-1127 Polk Street).

Land uses within the immediate vicinity of the project site include an 11-story, approximately 130-foot-tall mixed-use residential building (1285 Sutter Street); an under-construction six-story, approximately 64-foot-tall residential building (1131 Polk Street); a single-story religious institutional building (1227 Sutter Street); a three-story, approximately 50-foot-tall institutional building (1142 Van Ness Avenue); a single-story, approximately 20-foot-tall retail building (1161 Post Street); one- to three-story, approximately 45-foot-tall residential buildings (1115-1151 Post Street); and a 17-story, approximately 190-foot-tall mixed-use building containing retail, healthcare, and residential uses (1 Daniel Burnham Court), as shown in Figure 2, p. 4. The project site is located approximately seven blocks northeast of Jefferson Square Park and approximately nine blocks southeast of Lafayette Park.

Regional access to the site is provided by Interstate 80 (I-80), US Highway 101 (US 101), and I-280. Van Ness Avenue is designated as US 101 in the vicinity of the project site, and I-80 and I-280 are located approximately 1.15 and 1.55 miles southeast of the project site, respectively. Local transit service is provided by San Francisco Municipal Railway (Muni) lines, which provide access to regional transit operators (e.g., Bay Area Rapid Transit [BART], AC Transit). A total of 30 transit stops are located within 0.25 miles of the project site, 10 of which are located along Van Ness Avenue. In addition, the project site is adjacent to the Van Ness Bus Rapid Transit (BRT) route, which is currently under construction and will include dedicated transit-only lanes, enhanced traffic signal optimization for north-south bus travel, improved bus boarding features, safety enhancements for pedestrians, and sheltered platforms. The Civic Center BART station is located approximately 0.8 miles southeast of the project site.

The project site is within the RC-4 (Residential-Commercial, High Density) Zoning District, the Van Ness Special Use District (SUD), the Van Ness Automotive SUD, the Van Ness Avenue Area Plan, and a 130-V height and bulk district. The RC-4 district also encompasses most of the properties in the immediate vicinity of the project site, while properties along Polk Street are located in the Polk Street Neighborhood Commercial District (Polk Street NCD) and some properties west of Van Ness Avenue are located in the NC-3 (Neighborhood Commercial, Moderate Scale) district.

## Cumulative Setting

CEQA Guidelines section 15310(b)(1) provides two methods for cumulative impact analysis: the "list-based approach" and the "projections-based approach." The list-based approach uses a list of projects producing closely related impacts that could combine with those of a proposed project to evaluate whether the project would contribute to significant cumulative impacts. The projections-based approach uses projections contained in a general plan or related planning document to evaluate the potential for cumulative impacts. This project-specific analysis employs both the list-based and projections-based approaches, depending on which approach best suits the resource topic being analyzed.

Cumulative development in the project vicinity (within an approximately 0.25-mile radius of the project site) is provided in **Table 2, Cumulative Projects in the Vicinity of the Project Site**, p. 26**,** and shown in **Figure 18, Cumulative Projects Map**, p. 27. These projects are either projects for which the planning department has a project application on file or projects that have been entitled but have not yet begun construction. As shown, these projects include new residential, mixed-use, and automotive service/retail projects.

## Table 2: Cumulative Projects in the Vicinity of the Project Site

| Address | Planning Department Case No. | Project Description |
|---|---|---|
| 1433 Bush Street | 2015-009279PRJ | Construction of a new 10 story (115-foot-tall) mixed-use building with 32 dwelling units, 2 parking spaces, and a ground floor commercial space to be used for an automotive rental use. |
| 1567 California Street | 2018-011249PRJ | The proposed project would demolish the existing commercial building constructed in 1900, and construct an eight-story over partial basement (lower ground level), approximately 80-foot-tall (88-foot-tall with penthouse), 106,733-gross-square-foot mixed-use building including 9,823 gross square-feet of ground floor commercial and 100 dwelling units. |
| 1142 Van Ness Avenue | 2019-012970PRJ (analyzed in addendum to 2008.0586E) | The proposed project would convert 50,221 square feet of an existing inactive private community facility to post-secondary educational institution use. |
| 888 Post Street | 2019-023636PRJ | The proposed project is a change of use for an existing three-story vacant commercial building to social service/institutional use with 76 shelter beds and on-site support services including a donation center and job training facility. |
| 1033 Polk Street | 2014.0914E | The proposed project would demolish the existing building and construct an eight-story (85-foot-tall), mixed-use residential building with ground-floor retail space and residential uses above. |
| 1333 Gough Street and 1481 Post Street | 2005.0679E | The proposed project includes construction of a 23-story (398-foot-tall), 231-unit residential tower addition to an existing 14-story residential building. The proposed project includes consolidation of all residential parking for both buildings in a new below-ground parking structure for 354 vehicles. |
| 1525 Pine Street | 2015-009955ENV | The proposed project includes demolition of an existing one-story restaurant; construction of a new eight-story (83-foot-tall) mixed-use commercial and residential building with two commercial spaces at ground floor. |
| 955 Post Street | 2015-015950ENV | The proposed project would demolish an existing two-story office/auto repair building and construct a new eight-story (80-foot-tall) building containing 69 dwelling units over 7,700 square feet of ground-floor retail, and below-grade parking for 55 vehicles. |
| 921 O'Farrell Street | 2018-014727ENV | The proposed project would demolish an existing two-story commercial building and construct a 14-story (approximately 130-foot-tall) residential building with ground floor commercial use. |
| 1101-1123 Sutter Street | 2019-022850ENV | The project site contains a three-story auto repair/garage at 1101 Sutter and a mortuary at 1123 Sutter. The auto repair building would be renovated. The mortuary would be demolished or reconstructed into a 14-story (150-foot-tall) building. The buildings would contain 217 residences, ground-floor commercial, a childcare center, and 59 vehicle parking spaces. |

Source: SF Development Pipeline Map, http://developmentmap.sfplanning.org/, July 15, 2020. Updated February 4, 2021.


LEGEND

1. 1433 Bush Street
2. 1567 California Street
3. 1142 Van Ness Avenue
4. 888 Post Street
5. 1033 Polk Street
6. 1333 Gough Street/1481 Post Street
7. 1525 Pine Street
8. 955 Post Street
9. 921 O'Farrell Street
10. 1101-1123 Sutter Street

N

0 250 500
FEET

SOURCE: ESRI World Street Map (2020).

FIGURE 18

*1200 Van Ness Avenue Project*

Cumulative Projects Map

## C. Compatibility with Zoning and Plans

| | Applicable | Not Applicable |
|---|---|---|
| Discuss any variances, special authorizations, or changes proposed to the planning code or zoning map, if applicable. | ☒ | ☐ |
| Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable. | ☒ | ☐ |
| Discuss any approvals and/or permits from city departments other than the planning department or the Department of Building Inspection, or from regional, state, or federal agencies. | ☒ | ☐ |

This section discusses potential inconsistencies of the proposed project with applicable local and regional plans and policies. Inconsistencies with existing plans and policies do not, in and of themselves, indicate a significant physical environmental effect. To the extent that adverse physical environmental impacts may result from such inconsistencies, these impacts are analyzed in this initial study under the specific environmental topic sections below in Section E, Evaluation of Environmental Effects.

The proposed project would intensify land uses on an urban infill site and, to the extent that there are conflicts between the proposed project and applicable plans, policies, and regulations, those conflicts would be considered by city decision-makers when they decide whether to approve, modify, or disapprove the proposed project.

### San Francisco Planning Code and Zoning Maps

The planning code, which incorporates by reference the city's zoning maps, governs permitted uses, densities, and the configuration of buildings within San Francisco. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless: (1) the proposed project complies with the planning code, (2) an allowable exception or variance is granted, or (3) legislative amendments to the planning code are included and adopted as part of the proposed project.

#### ALLOWABLE USES

The project site is located in the RC-4 (Residential-Commercial, High Density) zoning district. According to planning code section 209.3, the RC-4 zoning district is intended to protect, conserve, and enhance areas characterized by structures combining residential uses with neighborhood-serving commercial uses. The predominant residential uses are preserved, while provision is made for supporting commercial uses, usually in or below the ground story, that meet the frequent needs of nearby residents without generating excessive vehicular traffic. The compact, walkable, transit-oriented, and mixed-use nature of these districts is recognized by no off-street parking requirements. The emphasis in the RC-4 district is to provide a mixture of high-density dwellings with supporting commercial uses.

The project site is also located within the Van Ness SUD, which was created in order to implement the objectives and policies of the Van Ness Avenue Area Plan, including: (1) creation of a mix of residential and commercial uses on the boulevard, (2) preservation and enhancement of the pedestrian environment, (3) encouragement of the retention and appropriate alteration of architecturally and historically significant and contributory buildings, (4) conservation of the existing housing stock, and (5) enhancement of the visual and urban design quality of the street.

The proposed project would be consistent with the RC-4 zoning district and Van Ness SUD, as health service, residential, retail, and restaurant uses are either permitted or conditionally permitted within these districts. The proposed project includes requests for a conditional use authorization to reduce the Van Ness SUD residential to non-residential use ratio from 3:1 to about 1.05:1; allow non-residential use size at 6,000 square feet or greater; allow retail sales and services use on second floor and above; review of buildings greater than 50 feet tall; and allow bulk limit exceptions for both the diagonal and horizontal dimensional measurements. The project would require approval of a conditional use authorization for a planned unit development with modifications to rear yard, common open space, dwelling unit exposure, ground floor ceiling height, and dimensional and vertical clearance standards for off-street freight loading requirements. These modifications, including the applicable planning code sections, are described in detail in Section A, Project Approvals.

**HEIGHT AND BULK**

The project site is located within the 130-V height and bulk district. This height and bulk district allows for buildings up to 130 feet in height, with an additional 16 feet for rooftop appurtenances such as elevator penthouses (a total height of 146 feet). In the RC-4 district and the Van Ness SUD, planning code sections 253 and 253.2 require conditional use authorization for any new building exceeding 50 feet in height, and the planning commission may require a setback of up to 20 feet at a height of 50 feet or above for all or portions of a building if it determines that this requirement is necessary in order to maintain the continuity of the prevailing street wall height established by the existing buildings along Van Ness Avenue within two blocks of the proposed building. All buildings in this district are subject to the bulk restrictions in section 270(a) of the planning code. The proposed project would result in the construction of a new, 13-story (approximately 130-foot-tall, excluding approximately 16-foot-tall rooftop appurtenances) building. The project includes a conditional use authorization request under planning code section 303 for bulk limit exceptions for both the diagonal and horizontal dimensional measurements to achieve an architecturally desirable design of the residential tower while also reasonably maximizing residential density. The environmental effects of the project's proposed height and bulk are evaluated in Section E, Evaluation of Environmental Effects.

**FLOOR AREA RATIO**

Floor area ratio (FAR) is a measure of building intensity based on the ratio between the total floor area to be built on a site and the size of that site. In the RC-4 District, a 4.8:1 FAR is allowed for non-residential uses, and the Van Ness SUD allows for a basic FAR of 7.0:1 for a building in the 130-foot height district. The proposed project would have a basic FAR of 7.6:1 and would require a planned unit development exception under planning code section 304.

**SETBACKS**

Pursuant to planning code section 209.3, the proposed project is not required to provide street level front or side setbacks. A rear yard setback equivalent to 25 percent of the lot depth, but in no case less than 15 feet, would be required at the first building level with dwelling units. The proposed project would not provide street level setbacks along the Van Ness Avenue or Hemlock Street frontages, but would provide a setback along the Post Street frontage that would range from approximately 8 feet to 9 feet to accommodate a wider path of accessible pedestrian travel and provide for more robust public use of the Post Street frontage. As the project includes dwelling units at the street level on Hemlock Street, a rear yard setback starting at street level would be required absent a planned unit development modification. The proposed project would not provide a rear yard setback and therefore would require a planned unit development exception

under planning code section 304. Additionally, the proposed project would comply with the Van Ness SUD upper-level setback requirements by providing a minimum setback of approximately 28 feet at the podium level along the Van Ness Avenue frontage. As discussed above, the planning commission may require a setback of up to 20 feet at a height of 50 feet or above for all or portions of a building in order to maintain the continuity of the prevailing street wall height established by the existing buildings along Van Ness Avenue within two blocks of the proposed building (planning code section 253.2). Upper level setbacks on Post and Hemlock streets would range between 15 feet, 11 inches and 50 feet, 1 inch at the podium level.

**OPEN SPACE REQUIREMENTS**

The proposed project would provide a total of approximately 4,397 square feet of private open space and 6,075 square feet of common useable open space. Private open space would consist of private patios and decks for 42 dwelling units. The common useable open space would consist of an outdoor patio and garden space on the sixth floor podium level. The common useable open space would not comply with the standards of planning code section 135, and therefore the proposed project would require a planned unit development exception under planning code section 304.

**PARKING AND LOADING REQUIREMENTS**

According to section 151.1 of the planning code there is no minimum requirement for off-street parking in the RC-4 district. Maximum off-street parking is limited to 0.5 parking spaces per dwelling unit or up to 0.75 parking space per dwelling unit with conditional use authorization, one space for every 300 occupied square feet of health service space, one space for every 500 occupied square feet up to 20,000 square feet of retail space, and one space for every 200 occupied square feet of eating and drinking space. The proposed project would include a total of 53 residential parking spaces, 217 for health service use, and five car share spaces pursuant to planning code section 166 (car share spaces do not count as accessory parking spaces).

According to section 152 of the planning code, retail sales and services uses over 100,000 occupied square feet in size must provide a minimum of three off-street loading spaces, plus an additional space for each additional 80,000 square feet of occupied floor area. The proposed project would provide four on-site commercial loading spaces within the first below-grade garage level (three for the retail uses totaling approximately 124,000 square feet of occupied floor area and one for residential uses totaling just over 100,000 square feet in occupied floor area). The planning code requires the first off-street loading space to have a minimum width of 10 feet, length of 25 feet, and vertical clearance of 12 feet; the remaining spaces are required to have a minimum length of 35 feet, width of 12 feet, and vertical clearance of 14 feet. Due to site constraints, the four basement-level loading spaces would have a width of 10 feet, length of 25 feet, and vertical clearance of 10 feet. The proposed project requires a PUD exception from the dimensional and vertical clearance standards for these loading spaces. In addition, yellow (commercial) loading zones would be provided along both Post and Hemlock streets, each of which would provide four loading spaces.

Per planning code section 155.2, 127 class 1 and 26 class 2 bicycle facilities would be required for the proposed project. The proposed project includes 127 class 1 spaces, which would be within 100 feet of a lobby door pursuant to planning code section 155.1(B)(1)(A), and 26 class 2 bicycle facilities. Therefore, the proposed project would comply with the planning code requirements for parking and loading.

#### STREET TREES

The project site does not contain any on-site trees or landscaping, but four existing street trees are present along the Van Ness Avenue frontage. Planning code section 138.1(c)(1) requires that the project sponsor plant and maintain street trees as set forth in article 16, sections 805(a) and (d) and 806(d) of the public works code. The proposed project would comply with section 138.1(c)(1) by providing 14 new street trees along the Post Street frontage, in addition to retaining the four existing trees. The sponsor would also pay an in-lieu fee for less than the required street tree plantings on Hemlock Street in order to accommodate a sufficiently wide path of accessible pedestrian travel on the Hemlock Street sidewalk, as requested by the Streetscape Design Advisory Team.

### Plans and Policies

#### SAN FRANCISCO GENERAL PLAN

The general plan establishes objectives and policies to guide land use decisions related to the physical development of San Francisco. It is comprised of 10 elements, each of which addresses a particular topic that applies citywide: air quality; arts; commerce and industry; community facilities; community safety; environmental protection; housing; recreation and open space; transportation; and urban design. Any conflict between the proposed project and policies that relate to physical environmental issues are discussed in Section E, Evaluation of Environmental Effects. The compatibility of the proposed project with general plan policies that do not relate to physical environmental issues will be considered by decision-makers as part of their decision whether to approve or disapprove the proposed project. The project consists of the demolition of the existing building on the project site and the construction of a mixed-use building containing health service, residential, retail, and restaurant uses; it would not introduce incompatible land uses to the neighborhood. The project would not otherwise conflict with any general plan policies or objectives. Thus, the project would not be inconsistent with the San Francisco General Plan.

#### PRIORITY POLICIES

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added section 101.1 to the planning code and established eight priority policies. These policies, and the topics in Section E, Evaluation of Environmental Effects, that address the environmental issues associated with these policies, are: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character; (3) preservation and enhancement of affordable housing (Section E.2(b), Population and Housing, regarding housing supply and displacement issues); (4) discouragement of commuter automobiles (Sections E.5(a) and E.5(b), Transportation and Circulation); (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; (6) maximization of earthquake preparedness (Sections E.15(a) through E.15(d), Geology and Soils); (7) preservation of landmark and historic buildings (Section E.3(a), Cultural Resources); and (8) protection of open space (Section E.9, Wind; Section E.10, Shadow; Section E.13, Public Services; and Section E.11(a), Recreation). Prior to issuing a permit for any project that requires an initial study under CEQA, and prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action that requires a finding of consistency with the general plan, the city is required to find that the proposed project or legislation would be consistent with the priority policies.

As noted above, the compatibility of the proposed project with general plan objectives and policies that do not relate to physical environmental issues will be considered by decision-makers as part of their decision

whether to approve or disapprove the proposed project. Any potential conflicts identified as part of that process would not alter the physical environmental effects of the proposed project.

**HEALTH CARE SERVICES MASTER PLAN**

Pursuant to planning code section 342, any change of use to a medical use that would occupy 10,000 gsf of floor area, or any expansion of an existing medical use that would add at least 5,000 gsf of floor area is required to file a Consistency Determination Application with the planning department. The proposed project would increase the existing health service square footage on the project site from 53,450 to 106,700 square feet. The proposed project would locate new health service and residential uses along the Van Ness Avenue corridor, which has been determined to be a suitable location for health services based on its location in the center of the city and proximity to high-quality public transit options and bicycle and pedestrian routes. In addition, the proposed project would include ground-level residential uses along Hemlock Street. The planning department, after consultation with the health department, would issue an initial consistency determination. If the planning department receives written objections setting forth substantive arguments within 15 days after issuance of the consistency determination, the consistency determination and objection would be heard by the health commission, which would make a consistency recommendation to the planning commission. The planning commission would then consider the consistency determination at the same time it hears the other project approvals. Any potential inconsistency identified as part of that process would not alter the physical environmental effects of the proposed project.

**REGIONAL PLANS AND POLICIES**

The four principal regional planning agencies and their overarching policies and plans (noted in parentheses) that guide planning in the nine-county Bay Area include the Bay Area Air Quality Management District (2017 Bay Area Clean Air Plan), the Metropolitan Transportation Commission (Plan Bay Area 2040),[4] the San Francisco Regional Water Quality Control Board (San Francisco Basin Plan), and the San Francisco Bay Conservation and Development Commission (San Francisco Bay Plan). Due to the location, size, and nature of the proposed project, the proposed project is not anticipated to be inconsistent with regional plans and policies.

## D. Summary of Environmental Effects

The proposed project could potentially affect the environmental factor(s) checked below. The following pages present a more detailed checklist and discussion of each environmental factor.

| | | |
|---|---|---|
| ☐ Land Use/Planning | ☐ Greenhouse Gas Emissions | ☐ Hydrology/Water Quality |
| ☐ Aesthetics | ☐ Wind | ☐ Hazards & Hazardous Materials |
| ☐ Population and Housing | ☐ Shadow | ☐ Mineral Resources |
| ☒ Cultural Resources | ☐ Recreation | ☐ Energy |
| ☒ Tribal Cultural Resources | ☐ Utilities/Service Systems | ☐ Agriculture and Forestry Resources |
| ☐ Transportation and Circulation | ☐ Public Services | ☐ Wildfire |
| ☒ Noise | ☐ Biological Resources | ☐ Mandatory Findings of Significance |
| ☒ Air Quality | ☒ Geology/Soils | |

[4] Plan Bay Area 2040 is currently in the process of being updated. Plan Bay Area 2050 is anticipated to be final in fall 2021.

## E. Evaluation of Environmental Effects

This initial study examines the proposed project to identify potential effects on the environment. For each item on the initial study checklist, the evaluation has considered the impacts of the proposed project both individually and cumulatively, except for regional air quality and greenhouse gases, which are considered on a cumulative basis due to the cumulative nature of the impact.

All items on the initial study checklist that have been checked "Less-than-Significant Impact with Mitigation Incorporated," "Less-than-Significant Impact," "No Impact," or "Not Applicable," indicate that, upon evaluation, staff has determined that the proposed project could not have a significant adverse environmental effect relating to that issue. A discussion is included for those issues checked "Less-than-Significant Impact with Mitigation Incorporated" and "Less-than-Significant Impact" and for most items checked "No Impact" or "Not Applicable." For all of the items checked "No Impact" or "Not Applicable" without discussion, the conclusions regarding potential significant adverse environmental effects are based upon field observation, staff experience, and expertise on similar projects, and/or standard reference material available within the planning department, such as the department's Transportation Impact Analysis Guidelines for Environmental Review, or the California Natural Diversity Database and maps, published by the California Department of Fish and Wildlife.

### Public Resources Code Section 21099

#### AESTHETICS AND PARKING

In accordance with California Public Resources Code section 21099, Modernization of Transportation Analysis for Transit Oriented Projects, aesthetics and parking shall not be considered in determining if a project has the potential to result in significant environmental effects, provided the project meets all of the following three criteria:

1. The project is in a transit priority area; and
2. The project is on an infill site; and
3. The project is residential, mixed-use residential, or an employment center.

The proposed project meets the above criteria; therefore, this initial study does not consider aesthetics and the adequacy of parking in determining the significance of project impacts under CEQA.[5]

Public resources code section 21099(e) states that a lead agency maintains the authority to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers, and that aesthetics impacts as addressed by the revised public resources code do not include impacts on historical or cultural resources. Thus, there is no change in the planning department's methodology related to design and historic review.

The planning department recognizes that the public and decision-makers nonetheless may be interested in information pertaining to the aesthetic effects of a proposed project and may desire that such information

[5] San Francisco Planning Department, *Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis,* September 16, 2020. This document (and all documents cited in this initial study unless otherwise noted) is available for review on the San Francisco Property Information Map, which can be accessed at http://sfplanninggis.org/PIM/?. Individual files can be viewed by clicking on the Planning Applications link, clicking on the "More Details" link under the project's environmental case number (2015-012577ENV), and clicking on the "Related Documents" link.

be provided as part of the environmental review process. Therefore, some of the information that would have otherwise been provided in an aesthetics section of an initial study (such as project drawings) is included in the project description. However, this information is provided solely for informational purposes and is not used to determine the significance of environmental impacts of the project pursuant to CEQA.

## Near-Term Baseline Analysis

CEQA Guidelines section 15125 states that the environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The environmental setting typically includes the existing physical conditions on the project site and vicinity, including projects that are under construction. The environmental analysis then presents existing and existing-plus-project scenarios to identify environmental impacts that would occur from implementation of a proposed project. However, where it is certain that near-term improvements would be implemented prior to a project's construction or operation, such analysis could be misleading to decision-makers and the public.

For this initial study, it is necessary to evaluate the environmental impacts of the proposed project against a near-term baseline that is different from the current existing conditions because two transportation infrastructure projects (the Van Ness Improvement Project/Van Ness BRT Project and Geary Boulevard Improvement Project) are either under construction or approved, funded and expected to be under construction or completed by the time the proposed project is operational. These projects and how they are included in the environmental analysis are further described below.

The Van Ness Improvement Project/Van Ness BRT Project is currently under construction adjacent to the project site on Van Ness Avenue and will be completed in 2022. As part of that project, two travel lanes will be provided on Van Ness Avenue in each direction, separated by median transit-only lanes. A bulbout into Van Ness Avenue will be provided at Post Street, and new sidewalk curb ramps will be provided at Post Street and at Hemlock Street. The curb lane between the bulbout at Post Street and Hemlock Street will be used for on-street parking or other curbside use. The proposed project was designed considering the final configuration of the Van Ness Improvement/Van Ness BRT Project.

The ongoing Geary Boulevard Improvement Project includes upgrades such as transit-only lanes, stop changes, new traffic signal infrastructure optimization, transit station enhancements, and new pedestrian and bus bulbs along Geary Boulevard, which is located one block south of the site. The segment between Market and Stanyan streets is currently being implemented as the phase 1 effort and is expected to be completed in 2021, while the detailed design for the segment of Geary Boulevard between Stanyan Street and 34th Avenue is currently on hold. The analysis considers the configuration of the Geary Boulevard Improvement Project phase 1 effort from Market to Stanyan streets, given that these improvements are underway.

The above projects will result in implementation of transportation network changes that are assumed to occur in the near-term baseline condition in order to evaluate the impact of the proposed project's operations under these conditions.

## Cumulative Analysis

CEQA Guidelines section 15355 states that the cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects. CEQA Guidelines section 15130(b)(1) provides for

two approaches to cumulative impacts analysis: list-based and projections-based. For a list-based approach, a list of probable future projects producing related impacts is prepared. For a projections-based approach, a summary of projects contained in an adopted local, regional, or statewide plan that describes or evaluates conditions contributing to the cumulative effect is used.

The discussion of cumulative impacts should reflect the severity of impact and their likelihood of occurrence, but the discussion need not provide as great of detail as is provided for effects attributable to the project alone. The discussion of cumulative impacts should be guided by the standards of practicality and reasonableness and should focus on the cumulative impacts to which the identified other projects contribute, rather than the attributes of other projects which do not contribute to the cumulative impact (CEQA Guidelines, section 15130[b]).

In this initial study, cumulative impacts are analyzed for each environmental topic and the proposed project's contribution to a cumulative impact, if any, is discussed. The cumulative impact analysis in this initial study may employ a list-based approach or a projections approach, depending on which approach best suits the individual resource topic being analyzed. As described above under Cumulative Setting, cumulative projects within a 0.25-mile radius of the project site are represented in Table 2, p. 26 and shown in Figure 18, p. 27. These projects may be considered in determining environmental effects that are more localized. A projections-based analysis would consider county-wide or regional growth and is typically based on growth projections developed by the Association of Bay Area Governments (ABAG) and refined by planning department staff. The cumulative analysis defines the cumulative context appropriate for analysis of each specific environmental topic.

## 1. Land Use and Planning

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project: | | | | | |
| a) Physically divide an established community? | ☐ | ☐ | ☒ | ☐ | ☐ |
| b) Cause a significant physical environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | ☐ | ☐ | ☒ | ☐ | ☐ |

**Impact LU-1: The proposed project would not physically divide an established community. (Less than Significant)**

The division of an established community typically involves the construction of a physical barrier to neighborhood access, such as a new freeway, or the removal of a means of access, such as a bridge or a roadway. Implementation of the proposed project would not result in the construction of a physical barrier to neighborhood access or the removal of an existing means of access; it would result in the construction of a new 13-story, 130-foot-tall building (with an additional approximately 13 feet, 8 inches for rooftop mechanical equipment) within established lot boundaries. The proposed project would not alter the established street grid or permanently close any streets or sidewalks. Hemlock Street west of the proposed

garage exit (i.e., between Van Ness Avenue and the garage exit) would be converted to a two-way street, adding a westbound direction, while Hemlock Street between the proposed garage exit and Polk Street would remain one-way eastbound. Additionally, left turns off of Hemlock Street to Polk Street would be prohibited. However, these circulation improvements are intended to improve circulation, allowing vehicles exiting the site to access either Van Ness Avenue or Polk Street, and would not remove an existing means of access. Although portions of the sidewalks and streets adjacent to the project site could be closed for periods of time during project construction, these closures would be temporary and only occur during construction. Therefore, the proposed project would result in a less-than-significant impact related to physically dividing an established community and no mitigation would be required.

**Impact LU-2: The proposed project would not cause a significant physical environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. (Less than Significant)**

Land use impacts could be considered significant if the proposed project would conflict with any plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact. The determination as to whether a conflict with a land use plan, policy, or regulation is significant under CEQA is based on whether that conflict would result in a significant physical environmental impact. The proposed project would not obviously conflict with any applicable land use plan, policy, or regulation such that an adverse physical change would result (see Section C, Compatibility with Zoning and Plans).

Applicable land use plans that regulate development on the project site include the San Francisco General Plan and the San Francisco Planning Code. As discussed in section C, Compatibility with Zoning and Plans, the proposed project would conform to the RC-4 zoning district and Van Ness SUD that allows for health service, residential, and commercial development as proposed by the project.

The physical environmental effects of the proposed project related to various resource topics are analyzed in this initial study. For these reasons, the impact of the proposed project with respect to any conflict with land use plans, policies, and regulations adopted for the purpose of mitigating an environmental effect would be less than significant and no mitigation would be required.

**Impact C-LU-1: The proposed project, in combination with cumulative projects, would not result in a cumulative impact related to land use. (Less than Significant)**

The cumulative context for land use effects are typically localized, within the immediate vicinity of the project site, or at the neighborhood level. Cumulative development in the project vicinity (within a 0.25-mile radius of the project site) includes the projects identified in Table 2, p. 26. The cumulative development projects in Table 2 consist of new residential, mixed-use, institutional, and automotive service/retail projects.

Upon completion of the project, the proposed project would not physically divide an established community, and therefore would have no potential to combine with cumulative projects to result in a significant physical environmental impact related to dividing an established community. During construction, the project may require temporary sidewalk and street closures as could other cumulative construction activity in the project vicinity. Because all sidewalk and street closures are required to maintain pedestrian access through the surrounding areas and because any access detours or restrictions would be

temporary in nature, any cumulative impacts related to physically dividing an established community would be less than significant.

All cumulative projects are required to conform with the planning code, including its zoning maps, and required to be generally consistent with the general plan. Therefore, the proposed project in combination with cumulative development projects would not result in a significant cumulative impact related to a conflict with a land use plan, policy, or regulation adopted for the purpose of mitigating an environmental impact, and cumulative impacts would be less than significant. No mitigation would be required.

## 2. Population and Housing

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project: | | | | | |
| a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | ☐ | ☐ | ☒ | ☐ | ☐ |
| b) Displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing? | ☐ | ☐ | ☐ | ☒ | ☐ |

### Impact PH-1: The proposed project would not directly or indirectly induce substantial population growth in an area. (Less than Significant)

The proposed project would be considered growth inducing if its implementation would result in substantial unplanned population increases and/or new development that might not occur if the project were not approved and implemented. The proposed project would include the construction of a mixed-use building containing approximately 106,700 gsf of health service use, 107 dwelling units, 24,520 gsf of retail uses, and 4,340 gsf of restaurant uses. The project site is in an urbanized area and would not be expected to substantially alter existing development patterns in the Downtown/Civic Center neighborhood in which it is located, or in San Francisco as a whole. Furthermore, the project site is in an established urban neighborhood and would not require, or create new demand for, the extension of municipal infrastructure.

According to the U.S. Census Bureau's most recent American Community Survey (based on 2018 data) San Francisco's population is 881,549 with 673,488 employees and 406,399 housing units.[6] Census Tract 120.00, which includes the project site and immediate vicinity, has a population of 3,993 and a total of 2,888 housing units.[7]

[6] U.S. Census Bureau, San Francisco County, California, Families and Living Arrangements, Households, 2014-2018. Available online at: https://www.census.gov/quickfacts/sanfranciscocountycalifornia, accessed September 30, 2020.

[7] United States Census Bureau, Explore Census Data, https://data.census.gov/cedsci/, accessed November 2020.

ABAG prepares projections of employment and housing growth for the Bay Area. The latest projections were prepared as part of Plan Bay Area 2040, which is the current long-range Regional Transportation Plan and Sustainable Communities Strategy adopted by the Metropolitan Transportation Commission and ABAG in March 2018.[8] Plan Bay Area identifies an increasing percentage of Bay Area growth that is expected to occur as infill development in areas with access to transit. To facilitate this growth, Plan Bay Area 2040 focuses growth and development in nearly 200 Priority Development Areas (PDAs). These existing neighborhoods are served by public transit and have been identified as appropriate for additional, compact development. The project site is located within the Downtown/Van Ness/Northeast Neighborhoods PDA. The growth projections prepared by ABAG for Plan Bay Area 2040 for San Francisco County anticipate that by 2040 San Francisco will have a population of 1,169,485 persons and 872,510 employees.[9] Additionally, the housing element of the San Francisco General Plan projects a population of 1,085,700 by 2040.[10]

Based on the average size in the City and County of San Francisco of 2.36 people per household,[11] the addition of 107 residential units, as the project proposes, would increase the citywide population by approximately 253 residents.[12] This would represent a residential population increase of approximately 6.3 percent over the existing census tract population, and approximately 0.03 percent citywide. The proposed project's 107 residential units would represent a fraction of the expected increase in citywide households and population, as projected in Plan Bay Area 2040 and the housing element. Therefore, the proposed project would not induce population growth but rather accommodate the need for housing within the city.

Based on their respective sizes, the proposed health service space (approximately 106,700 gsf) would employ a total of approximately 305 staff,[13] the proposed retail space (24,520 gsf) would employ a total of approximately 70 staff, and the new restaurant space (4,340 gsf) would employ a total of approximately 12 staff, for an approximate total of 387 staff at the project site. Even if all 387 new employees associated with the proposed project were conservatively assumed to be new to San Francisco, the project-related employment growth would represent considerably less than 1 percent of the city's estimated employment growth through 2040. For these reasons, implementation of the proposed project would not induce substantial growth or concentration of employment that would cause a substantial adverse physical change to the environment. In light of the above, additional residents and employees associated with the proposed project would have a less-than-significant impact related to population growth, both directly and indirectly and no mitigation would be required. The physical environmental effects of the project's anticipated increase in population (both residents and employees) are analyzed in the environmental topic sections of this initial study.

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8 Plan Bay Area 2040 is currently in the process of being updated. Plan Bay Area 2050 is anticipated to be final in fall 2021.

9 Metropolitan Transportation Commission and Association of Bay Area Government, Plan Bay Area 2040: Projections 2040: Forecasts for Population, Household and Employment for the Nine County San Francisco Bay Area Region. November 2018. This document is available online at: http://projections.planbayarea.org/, accessed October 1, 2020.

10 San Francisco Planning Department, *2014 Housing Element, San Francisco General Plan*, adopted April 27, 2015, http://www.sfplanning.org/ftp/General_Plan/2014HousingElement-AllParts_ADOPTED_web.pdf, accessed November 2020.

11 U.S. Census Bureau, San Francisco County, California, Families and Living Arrangements, Households, 2014-2018. Available online at: https://www.census.gov/quickfacts/sanfranciscocountycalifornia, accessed September 30, 2020.

12 107 residential units x 2.36 people per household = 253 new residents, rounded up.

13 San Francisco Planning Department, Citywide Division, Information & Analysis Group, November 7, 2019. The estimated number of employees is based on the city's Standard Operating Procedures which assumes an average of 1 employee per 350 square feet of health service space (106,700 gsf of health service use / 350 = 305 employees), and 1 employee per 350 square feet of retail and restaurant (24,520 gsf of retail / 350 = 70 employees; 4,340 gsf of restaurant / 350 = 12 employees).

**Impact PH-2: The proposed project would not displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing. (No Impact)**

As the project site does not currently contain any residential uses, the proposed project would not displace any residents or housing units. Therefore, the proposed project would have no direct impact related to the displacement of housing units or people and would not necessitate the construction of replacement housing. It is also noted that the planning department, with assistance from ALH Urban & Regional Economics, has completed extensive analysis of gentrification and displacement in the city to determine whether individual projects, including market rate housing projects, contribute to gentrification and displacement and whether either of these phenomena directly or indirectly result in physical environmental effects. The planning department has not found empirical evidence supporting the position that market rate housing development leads to residential or commercial displacement that results in secondary physical effects on the environment. No impact would occur and no mitigation would be required.

**Impact C-PH-1: The proposed project, in combination with cumulative projects, would not induce substantial population growth or displace substantial numbers of people or housing units. (Less than Significant)**

The cumulative context for the topic of population and housing is the City and County of San Francisco. The proposed project would provide housing units and commercial space that would result in increases in population (households and jobs). As discussed above, ABAG projects that by 2040 San Francisco will have a population of 1,169,485 and 872,510 employees. According to 2019 census information (based on 2018 data) San Francisco's population is 881,549 with 673,488 employees. As of the first quarter of 2020, approximately 70,800 net new housing units are in the development pipeline, i.e., are either under construction, have building permits approved or filed, or applications filed, including remaining phases of major multi-phased projects.[14] Conservatively assuming that every housing unit in the pipeline is developed and at 100 percent occupancy (no vacancies), the pipeline (which includes the proposed project) would accommodate an additional 70,800 households, or an increased population of approximately 167,088 people.[15] The pipeline also includes projects with land uses that would result in an estimated 75,448 new employees.[16] As shown in **Table 3, Citywide Development Pipeline Compared to ABAG 2040 Projections**, p. 40, cumulative household and employment growth is below the ABAG projections for planned growth in San Francisco. Therefore, the proposed project in combination with citywide development would not result in significant cumulative environmental effects associated with inducing unplanned population growth. Also, because the project would not displace any housing units, the project would not have the potential to contribute to cumulative impacts associated with the displacement of a substantial number of people or housing, necessitating the construction of replacement housing elsewhere. For this reason, cumulative population and housing impacts would be less than significant and no mitigation would be required.

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14 Data SF. SF Development Pipeline 2020 Q1. Available online at: https://data.sfgov.org/Housing-and-Buildings/SF-Development-Pipeline-2020-Q1/5s89-azqa. Accessed August 25, 2020.

15 Population is estimated based the total number of housing units in the pipeline multiplied by the citywide average persons per household from the U.S. Census for San Francisco County, currently 2.36 persons per household.

16 Data SF. SF Development Pipeline 2020 Q1. Available online at: https://data.sfgov.org/Housing-and-Buildings/SF-Development-Pipeline-2020-Q1/5s89-azqa. Accessed August 25, 2020.

**Table 3: Citywide Development Pipeline Compared to ABAG 2040 Projections**

| Data Source | Population/Residents | Employees |
|---|---|---|
| 2020 Q1 Development Pipeline | 167,088 | 75,448 |
| 2019 Census | 881,549 | 673,488 |
| **Cumulative Total** | **1,048,637** | **748,936** |
| ABAG 2040 Projections | 1,169,485 | 872,510 |
| Pipeline Development within ABAG 2040 Projection? (Y/N) | **Y** | **Y** |

Source: Data SF. SF Development Pipeline 2020 Q1. Available online at: https://data.sfgov.org/Housing-and-Buildings/SF-Development-Pipeline-2020-Q1/5s89-azqa, accessed August 25, 2020.

## 3. Cultural Resources

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project: | | | | | |
| a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5, including those resources listed in article 10 or article 11 of the San Francisco Planning Code? | ☐ | ☒ | ☐ | ☐ | ☐ |
| b) Cause a substantial adverse change in the significance of an archeological resource pursuant to §15064.5? | ☐ | ☒ | ☐ | ☐ | ☐ |
| c) Disturb any human remains, including those interred outside of formal cemeteries? | ☐ | ☒ | ☐ | ☐ | ☐ |

**Impact CR-1: The proposed project would not cause a substantial adverse change in the significance of an on-site historical resource as defined in CEQA Guidelines section 15064.5, including those resources listed in article 10 or 11 of the San Francisco Planning Code. (Less than Significant)**

Historical resources are those properties that meet the definitions in section 21084.1 of the CEQA statute and section 15064.5 of the CEQA Guidelines. Historical resources include properties listed in, or formally determined eligible for listing in, the California Register of Historical Resources (California register) or in an adopted local historic register. Historical resources also include resources identified as significant in a historical resource survey meeting certain criteria. Additionally, properties that are not listed but are otherwise determined to be historically significant, based on substantial evidence, would also be considered historical resources. The significance of a historical resource is materially impaired when a project "demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance."

In evaluating whether the proposed project would cause a substantial adverse change in the significance of a historical resource, the planning department must first determine whether the existing building on the project site is a historical resource. A property may be considered a historical resource if it meets any of the California register criteria related to (1) events, (2) persons, (3) architecture, or (4) information potential that make it eligible for listing in the California register, or if it is considered a contributor to a potential historic district.

The existing building on the project site was constructed in 1911 as an automobile showroom for the H.O. Harrison Company. As originally designed and constructed, the building featured rectangular show windows on the ground floor; a projecting awning over the Van Ness Avenue entry; double-height, multi-light, rectangular windows on the upper stories; and restrained neoclassical ornamentation that consisted of profiled window surrounds and a simple cornice. However, the building was extensively modified in the late 1980s, resulting in the application of new Neoclassical features such as faux rustication at the base, horizontal bandcourses, and keystones. The primary commercial entry was also shifted from the center of the Van Ness Avenue frontage to the corner of Van Ness Avenue and Post Street. As the proposed project would involve demolition of a property over 45 years old, a *historic resource evaluation*[17] was prepared and reviewed by the planning department in a subsequent *historic resource evaluation response*.[18] Based on the information provided in the evaluation, the department finds that the subject property does not appear to be eligible for inclusion on the California register as an individual resource or as a contributor to a historic district. This conclusion is based on the following information, which is summarized from the *historic resource evaluation* and *historic resource evaluation response*.

The construction of the original 1911 building represented a shift in both of the geographic locus and the architectural design of automobile showrooms in San Francisco, and therefore appears potentially significant under Criterion 1 (Events). However, due to the dramatic alterations to the building occurring in the late 1980s, the existing building no longer retains integrity of design, workmanship, or materials and therefore does not appear eligible for listing in the California register. Furthermore, although Henry O. Harrison, who commissioned the construction of the building, was a successful business person, there is no evidence that he was a particularly important figure in local, regional, or national history, nor is there evidence that he stood out in a particularly notable way from other business people or similarly successful colleagues in the field of automobile sales. Therefore, the property is not eligible for listing in the California register under Criterion 2 (Persons).

Regarding potential architectural significance, although the original Beaux-Arts design of the 1911 building may have possessed some merit, and original architects MacDonald & Applegarth are recognized masters responsible for several identified historic resources, an insufficient amount of the original design exists for staff to make an informed determination on its architectural significance. In addition, the current design resulting from the late 1980s alterations is not a good example of either Neoclassical or Postmodern design, does not represent an artistic accomplishment in its own right, and is not the work of a recognized master. Therefore, the property is not eligible for listing in the California register under Criterion 3 (Architecture). Finally, based upon a review of information in the department's records, the subject property is also not significant under Criterion 4 (Information Potential), which is typically associated with rare construction

[17] LSA, *Historic Resource Evaluation, 1200 Van Ness Avenue,* July 2017.
[18] San Francisco Planning Department, *Historic Resource Evaluation Response.* Case No. 2015-012577ENV, June 9, 2020.

types when involving the built environment. The subject property is not an example of a rare construction type and would therefore not be eligible for listing in the California register under Criterion 4.

The area surrounding the project site was evaluated previously in the Van Ness Auto Row Support Structures survey.[19] The surrounding area does not appear to contain a significant concentration of thematically or aesthetically unified buildings that would constitute a historic district. Therefore, the property is not eligible for listing in the California register as a contributor to a historic district.

In light of the above, the property is not eligible for listing in the California register either individually or as a contributor to a potential historic district. Planning department staff has thus determined the property at 1200 Van Ness Avenue is not a historical resource as defined by CEQA. Therefore, the demolition of the existing structure at 1200 Van Ness Avenue would have a less-than-significant impact on historic resources and no mitigation would be required.

**Impact CR-2: Construction of the proposed project could result in physical damage that would materially impair the adjacent historic resource. (Less than Significant with Mitigation)**

As discussed further in Section E.6, Noise, the 1101-1127 Polk Street building, which is a three-story building containing residential and retail uses located immediately adjacent to the eastern border of the project site, is categorized as a historic resource. The proposed project would use vibration-generating equipment during construction activities, including a shoring drill rig for foundation installation immediately adjacent to the 1101-1127 Polk Street building. As discussed further is Section E.6, Noise, shoring drill rigs generate approximately 0.995 PPV of groundborne vibration when measured within 5 feet. As a result, vibration at the nearest building from construction equipment would exceed the Caltrans damage criteria of 0.25 in/sec PPV for building damage to historic and older buildings for continuous/frequent intermittent sources. Any damage to the 1101-1127 Polk Street building that materially impairs this historic resource would be a significant impact.

**MITIGATION MEASURE**

To reduce this impact to a less-than-significant level, Mitigation Measure M-NO-2, Protection of Adjacent Building and Vibration Monitoring During Construction, has been identified and agreed to by the project sponsor. This measure is presented in Section E.6, Noise, under Impact NO-2, and would require the project sponsor to retain the services of a qualified historic preservation professional to undertake a pre-construction survey of the 1101-1127 Polk Street building and to prepare a project-specific vibration management and monitoring plan for review and approval by the Environmental Review Officer (ERO) or the ERO's designee to ensure that construction-period damage to adjacent historic structures would be avoided, substantially reduced, or repaired.

***Significance after Mitigation.*** Mitigation Measure M-NO-2 includes preparation and implementation of a pre-construction survey and a vibration management and monitoring plan. With implementation of Mitigation Measure M-NO-2, the proposed project's impact related to potential damage to adjacent historic resources would be less than significant.

[19] San Francisco Planning Department, *Van Ness Auto Row Support Structures, A Survey of Automobile-Related Buildings along the Van Ness Avenue Corridor*, February 2010.

**Impact CR-3: The proposed project could cause a substantial adverse change in the significance of an archeological resource. (Less than Significant with Mitigation)**

This section discusses archeological resources, both as historical resources, according to CEQA Guidelines section 15064.5, as well as unique archeological resources, as defined in section 21083.2(g). Determining the potential for encountering archeological resources includes relevant factors such as the location, depth, and amount of excavation proposed as well as any recorded information on known resources in the area.

Construction of the proposed project would require excavation of the project site to a depth of approximately 68 feet, 5 inches below the Van Ness Avenue grade and 44 feet below the Polk Street grade and removal of approximately 79,000 cubic yards of soil for construction of the below-grade garage and foundation work.

To determine the potential for the proposed project to affect archeological resources, the planning department conducted a *preliminary archeological review* of the project site.[20] Based on the results of the department's *preliminary archeological review*, discoveries of significant archeological resources are possible in the project area. Although no known CEQA-related significant archeological resources have been recorded within project area, geotechnical analysis and archival research show that there is a low potential for encountering buried prehistoric resources and moderate potential for encountering deposits associated with the 19th century development within the project site. The *preliminary archeological review* concurs with the *archeological research design and treatment plan*[21] prepared for the proposed project, which suggests that late 19th century deposits associated with Jewish residents of San Francisco and more deeply buried prehistoric deposits may have survived on portions of the property. If buried deposits were encountered, they would have high research potential, and represent a potentially significant CEQA resource.

Therefore, the proposed project has the potential to disturb significant archeological resources given the depth of excavation to approximately 44 to 69 feet bgs. Such an impact would be considered significant. To reduce impacts on significant archeological resources, Mitigation Measure M-CR-3, Archeological Testing, has been identified. This mitigation measure would require the project sponsor to retain the services of an archeologist from the department's qualified archeological consultants list to develop and implement an archeological testing plan. The project sponsor has agreed to implement Mitigation Measure M-CR-3, and with implementation of this measure, the proposed project's impact would be less than significant.

**MITIGATION MEASURE**

**Mitigation Measure M-CR-3** **Archeological Testing.** Based on the reasonable potential that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effects from the proposed project on buried or submerged historical resources and on human remains and associated or unassociated funerary objects. The project sponsor shall retain the services of an archeological consultant from the rotational qualified archeological consultants list (QACL) maintained by the planning department archeologist. After the first project approval action or as directed by the Environmental Review Officer (ERO),

[20] San Francisco Planning Department, *Environmental Planning Preliminary Archaeological Review for 1200 Van Ness Avenue*, September 23, 2020.
[21] Anthropological Studies Center, *1200 Van Ness Avenue, San Francisco, Archaeological Research Design and Treatment Plan*, April 2017.

the project sponsor shall contact the department archeologist to obtain the names and contact information for the next three archeological consultants on the QACL.

The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the ERO. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines section 15064.5 (a)(c).

**Archeological Testing Program.** The purpose of the archeological testing program will be to determine to the extent possible the presence or absence of archeological resources and to identify and to evaluate whether any archeological resource encountered on the site constitutes a historical resource under CEQA.

The archeological testing program shall be conducted in accordance with the approved archeological testing plan (ATP). The archeological consultant and the ERO shall consult on the scope of the ATP, which shall be approved by the ERO prior to any project-related soils disturbing activities commencing. The ATP shall be submitted first and directly to the ERO for review and comment and shall be considered a draft subject to revision until final approval by the ERO. The archeologist shall implement the approved testing as specified in the approved ATP prior to and/or during construction.

The ATP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, lay out what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. The ATP shall also identify the testing method to be used, the depth or horizontal extent of testing, the locations recommended for testing, and the archeological monitoring requirements for construction soil disturbance as warranted.

**Discovery Treatment Determination.** At the completion of the archeological testing program, the archeological consultant shall submit a

written summary of the findings to the ERO. The findings memo shall describe and identify each resource and provide an initial assessment of the integrity and significance of encountered archeological deposits

If the ERO in consultation with the archeological consultant determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, the ERO, in consultation with the project sponsor, shall determine whether preservation of the resource in place is feasible. If so, the proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource and the archeological consultant shall prepare an archeological resource preservation plan (ARPP), which shall be implemented by the project sponsor during construction. The consultant shall submit a draft ARPP to the planning department for review and approval.

If preservation in place is not feasible, a data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible. The ERO in consultation with the archeological consultant shall also determine if additional treatment is warranted, which may include additional testing and/or construction monitoring.

**Consultation with Descendant Communities.** On discovery of an archeological site with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group an appropriate representative of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to offer recommendations to the ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site.

**Archeological Data Recovery Program**. An archeological data recovery program shall be conducted in accordance with an archeological data recovery plan (ADRP) if all three of the following conditions apply: (1) a resource has the potential to be significant, (2) preservation-in-place is not feasible, and (3) the ERO determines that an archeological data recovery program is warranted. The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archeological consultant shall submit a draft ADRP to the ERO.

The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would

address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.

The scope of the ADRP shall include the following elements:

- **Field Methods and Procedures:** Descriptions of proposed field strategies, procedures, and operations.
- **Cataloguing and Laboratory Analysis:** Description of selected cataloguing system and artifact analysis procedures.
- **Discard and Deaccession Policy:** Description of and rationale for field and post-field discard and deaccession policies.
- **Security Measures:** Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities.
- **Final Report:** Description of proposed report format and distribution of results.
- **Curation:** Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

**Human Remains and Funerary Objects.** The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and federal laws. This shall include immediate notification of the ERO and the Medical Examiner of the City and County of San Francisco and, in the event of the Medical Examiner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission, who shall appoint a Most Likely Descendant (MLD). The MLD will complete his or her inspection of the remains and make recommendations or preferences for treatment within 48 hours of being granted access to the site (Public Resources Code section 5097.98). The ERO also shall be notified immediately upon the discovery of human remains.

The project sponsor and ERO shall make all reasonable efforts to develop a Burial Agreement ("Agreement") with the MLD, as expeditiously as possible, for the treatment and disposition, with appropriate dignity, of human remains and associated or unassociated funerary objects (as detailed in CEQA Guidelines section 15064.5(d)). The Agreement shall take into

consideration the appropriate excavation, removal, recordation, scientific analysis, custodianship, curation, and final disposition of the human remains and funerary objects. If the MLD agrees to scientific analyses of the remains and/or associated or unassociated funerary objects, the archeological consultant shall retain possession of the remains and funerary objects until completion of any such analyses, after which the remains and funerary objects shall be reinterred or curated as specified in the Agreement.

Nothing in existing state regulations or in this mitigation measure compels the project sponsor and the ERO to accept treatment recommendations of an MLD. However, if the ERO, project sponsor and MLD are unable to reach an Agreement on scientific treatment of the remains and funerary objects, the ERO, with cooperation of the project sponsor, shall ensure that the remains and/or mortuary materials are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity, in a location not subject to further or future subsurface disturbance.

Treatment of historic-period human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activity, additionally, shall follow protocols laid out in the project's archeological treatment documents, and in any related agreement established between the project sponsor, Medical Examiner and the ERO.

**Archeological Public Interpretation Plan.** The project archeological consultant shall submit an archeological public interpretation plan (APIP) if a significant archeological resource is discovered during a project. If the resource to be interpreted is a tribal cultural resource, the APIP shall be prepared in consultation with and developed with the participation of Ohlone tribal representatives. The APIP shall describe the interpretive product(s), locations or distribution of interpretive materials or displays, the proposed content and materials, the producers or artists of the displays or installation, and a long-term maintenance program. The APIP shall be sent to the ERO for review and approval. The APIP shall be implemented prior to occupancy of the project.

**Archeological Resources Report.** Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the testing and any monitoring undertaken pursuant to this measure to the ERO. The archeological consultant shall submit a draft archeological resources report (ARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describe the archeological, historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken, and if applicable, discuss curation arrangements. Formal site recordation forms (CA DPR 523 series) shall be attached to the ARR as an appendix.

Once approved by the ERO, copies of the ARR shall be distributed as follows: California Archeological Site Survey Northwest Information Center (NWIC) shall receive one copy and the ERO shall receive a copy of the transmittal of the ARR to the NWIC. The environmental planning division of the planning department shall receive one bound hard copy of the ARR. Digital files that shall be submitted to the environmental division include an unlocked, searchable PDF version of the ARR, GIS shapefiles of the site and feature locations, any formal site recordation forms (CA DPR 523 series), and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. The PDF ARR, GIS files, recordation forms, and/or nomination documentation should be submitted via USB or other stable storage device. If a descendant group was consulted during archeological treatment, a PDF of the ARR shall be provided to the representative of the descendant group.

**Curation**. If archeological data recovery is undertaken, materials and samples of future research value from significant archeological resources shall be permanently curated at a facility approved by the ERO.

***Significance after Mitigation.*** Under this measure, an archeological consultant would implement a project-specific archeological testing plan. In the event that significant archeological resources are discovered, preservation in place of the resource or implementation of a data recovery and/or a public interpretation program is required. Therefore, the significant information that the archeological resource(s) provides would either be preserved or documented. With implementation of Mitigation Measure M-CR-3, the impact on prehistoric or historical archeological resources from project construction would be less than significant.

**Impact CR-4: The project could disturb human remains, including those interred outside of formal cemeteries. (Less than Significant with Mitigation)**

There are no known human remains, including those interred outside of formal cemeteries, located in the immediate vicinity of the project site. However, human remains may be present in prehistoric archeological deposits, and also may potentially be found in isolation. In the event that human remains are encountered during construction, any inadvertent damage to human remains would be considered a significant impact.

**MITIGATION MEASURE**

To reduce this impact to a less-than-significant level, Mitigation Measure M-CR-3, Archeological Testing, has been identified and agreed to by the project sponsor. This measure is presented above under Impact CR-3 and requires the project sponsor to notify the Medical Examiner of the City and County of San Francisco when human remains are discovered, and if the remains are determined to be Native American, solicit the most likely descendants' recommendations and adhere to appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition protocols for the treatment of human remains.

***Significance after Mitigation.*** Mitigation Measure M-CR-3 includes required procedures for the treatment of human remains. With implementation of Mitigation Measure M-CR-3, the proposed project's impact related to potential disturbance of human remains would be less than significant.

**Impact C-CR-1: The proposed project, in combination with cumulative projects, would not result in cumulative impacts on cultural resources. (Less than Significant)**

As discussed above, the building complex on the project site does not retain sufficient integrity to be eligible for listing in the California register, and therefore is not historically significant. Thus, redevelopment of the project site would not result in the direct loss or change to a historic structure. The project site is not within a historic district, conservation district, or thematic district. Similarly, cumulative projects located nearby, listed in Table 2, p. 26 and shown in Figure 18, p. 27, are also not located within a historic district. Therefore, the proposed project would not combine with cumulative projects to result in significant impacts to historic architectural resources or adjacent historic districts and this impact would be less than significant and no mitigation would be required. Additionally, vibration impacts are highly localized and unlikely to combine with those of nearby projects. Therefore, given that there are no other cumulative projects directly adjacent to the proposed project, the proposed project would not have the potential to combine with nearby projects to result in cumulative vibration impacts on historic resources.

Impacts to archeological resources and human remains are generally site-specific and limited to the project's construction area. As shown in Figure 18, the closest cumulative projects are the 1142 Van Ness Avenue and 1033 Polk Street projects, located within the block immediately south of the project site, at a distance of approximately 60 feet and 170 feet from the site, respectively. The 1142 Van Ness Avenue project does not propose excavation and the 1033 Polk Street project is sufficiently far enough away from the proposed project such that cumulative archeological and human remain impacts are unlikely. Therefore, cumulative impacts to archeological resources and human remains would be less than significant and no mitigation would be required.

## 4. Tribal Cultural Resources

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project: | | | | | |
| a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: | | | | | |
| i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | ☐ | ☒ | ☐ | ☐ | ☐ |

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | ☐ | ☒ | ☐ | ☐ | ☐ |

**Impact TC-1: The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code section 21074. (Less than Significant with Mitigation)**

CEQA section 21074.2 requires the CEQA lead agency to consider the effects of a project on tribal cultural resources. As defined in section 21074, tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are listed, or determined to be eligible for listing, on the national, state, or local register of historic resources.

Pursuant to CEQA section 21080.3.1(d), on September 25, 2020, the planning department contacted Native American individuals and organizations for the San Francisco area, providing a description of the project and requesting comments on the identification, presence, and significance of tribal cultural resources in the project vicinity. During the comment period, no Native American tribal representatives contacted the planning department to request consultation. On this basis, there are no known tribal cultural resources on the project site.

As discussed in Impact CR-3 in Section E.3, Cultural Resources, the project site has low sensitivity for prehistoric resources. In San Francisco, based on tribal consultation undertaken by the City and County of San Francisco in 2015, prehistoric archeological resources are considered also to be potential tribal cultural resources. Impact CR-3 determines that the proposed project's excavation could result in a significant impact to prehistoric archeological resources should any be encountered. Therefore, the proposed project also has the potential to encounter tribal cultural resources during soil disturbing activities. Any inadvertent damage to tribal cultural resources would be considered a significant impact. **Mitigation Measure M-TC-1, Tribal Cultural Resources Archeological Resource Preservation Plan and/or Interpretive Program** has been identified to reduce impacts to tribal cultural resources encountered during construction activities to less-than-significant levels. The project sponsor has agreed to implement Mitigation Measure M-TC-1, below.

**MITIGATION MEASURE**

**Mitigation Measure M-TC-1 Tribal Cultural Resources Archeological Resource Preservation Plan and/or Interpretive Program.**

**Preservation in Place.** In the event of the discovery of an archeological resource of Native American origin, the Environmental Review Officer (ERO),

the project sponsor, and the tribal representative, shall consult to determine whether preservation in place would be feasible and effective. If it is determined that preservation-in-place of the tribal cultural resource would be both feasible and effective, then the archeological consultant shall prepare an archeological resource preservation plan (ARPP), which shall be implemented by the project sponsor during construction. The consultant shall submit a draft ARPP to the planning department for review and approval.

**Interpretive Program.** If the ERO, in consultation with the affiliated Native American tribal representatives and the project sponsor, determines that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option, the project sponsor shall implement an interpretive program of the tribal cultural resource in consultation with affiliated tribal representatives. A tribal cultural resources interpretation plan produced in consultation with the ERO and affiliated tribal representatives, at a minimum, and approved by the ERO would be required to guide the interpretive program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, artifacts displays and interpretation, and educational panels or other informational displays.

***Significance after Mitigation.*** Mitigation Measure M-TC-1 would require either preservation-in-place of the tribal cultural resources if determined effective and feasible, or the project sponsor would coordinate with the affiliated Native American tribal representatives to prepare and implement an interpretive program regarding the tribal cultural resource. Therefore, with implementation of Mitigation Measure M-TC-1, impacts to tribal cultural resources would be reduced to less than significant.

**Impact C-TC-1: The proposed project, in combination with cumulative projects, would not result in cumulative impacts on tribal cultural resources. (Less than Significant)**

As discussed above in Impact C-CR-1, impacts of the proposed project would be unlikely to combine with impacts of cumulative projects to result in cumulative impacts to prehistoric archeological resources, which are also tribal cultural resources. Therefore, cumulative impacts to tribal cultural resources would also be less than significant.

## 5. Transportation and Circulation

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project: | | | | | |
| a) Involve construction that would require a substantially extended duration or intensive activity, the effects of which would create potentially hazardous conditions for people walking, bicycling, or driving, or public transit operations; or interfere with emergency access or accessibility for people walking or bicycling; or substantially delay public transit? | ☐ | ☐ | ☒ | ☐ | ☐ |
| b) Create potentially hazardous conditions for people walking, bicycling, or driving or public transit operations? | ☐ | ☐ | ☒ | ☐ | ☐ |
| c) Interfere with accessibility of people walking or bicycling to and from the project site, and adjoining areas, or result in inadequate emergency access? | ☐ | ☐ | ☒ | ☐ | ☐ |
| d) Substantially delay public transit? | ☐ | ☐ | ☒ | ☐ | ☐ |
| e) Cause substantial additional vehicle miles traveled or substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow travel lanes) or by adding new roadways to the network? | ☐ | ☐ | ☒ | ☐ | ☐ |
| f) Result in a loading deficit, the secondary effects of which would create potentially hazardous conditions for people walking, bicycling, or driving; or substantially delay public transit? | ☐ | ☐ | ☒ | ☐ | ☐ |
| g) Result in a substantial vehicular parking deficit, the secondary effects of which would create potentially hazardous conditions for people walking, bicycling, or driving; or interfere with accessibility for people walking or bicycling or inadequate access for emergency vehicles; or substantially delay public transit? | ☐ | ☐ | ☒ | ☐ | ☐ |

Consistent with Senate Bill 743, parking impacts of the proposed project shall not be considered significant impacts on the environment, as the proposed project is on an infill site, located in a transit priority area, and is a mixed-use residential project (as discussed above in Section D, Summary of Environmental Effects).[22]

[22] San Francisco Planning Department, *Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis,* September 16, 2020. This document (and all documents cited in this initial study unless otherwise noted) is available for review on the San Francisco Property Information Map, which can be accessed at http://sfplanninggis.org/PIM/?. Individual files can be viewed by clicking on the Planning Applications link, clicking on the "More Details" link under the project's environmental case number (2015-012577ENV), and clicking on the "Related Documents" link.

Additionally, the project site is located within the map-based screening area for vehicle miles traveled (VMT) (i.e., greater than 15 percent below the regional average) which indicates that the project would not result in a substantial parking deficit, and thus would not result in secondary effects related to potentially hazardous conditions or interfere with accessibility for people walking or bicycling, or inadequate access for emergency vehicles, or substantial delay to transit. For these reasons, it was determined that the proposed project would result in less than significant project-level and cumulative impacts associated with vehicular parking and a more detailed parking analysis is not required. Therefore, no further analysis of parking is provided.

This transportation analysis was prepared in accordance with the planning department's 2019 Transportation Impact Analysis Guidelines for Environmental Review (SF Guidelines)[23] and examines the transportation-related impacts of the proposed project's construction activities, and the proposed project's operational impacts on transportation hazards, accessibility, public transit, VMT, and loading. Supporting information is provided in the *travel demand memorandum* prepared for the proposed project.[24]

**SETTING (NEAR-TERM BASELINE)**

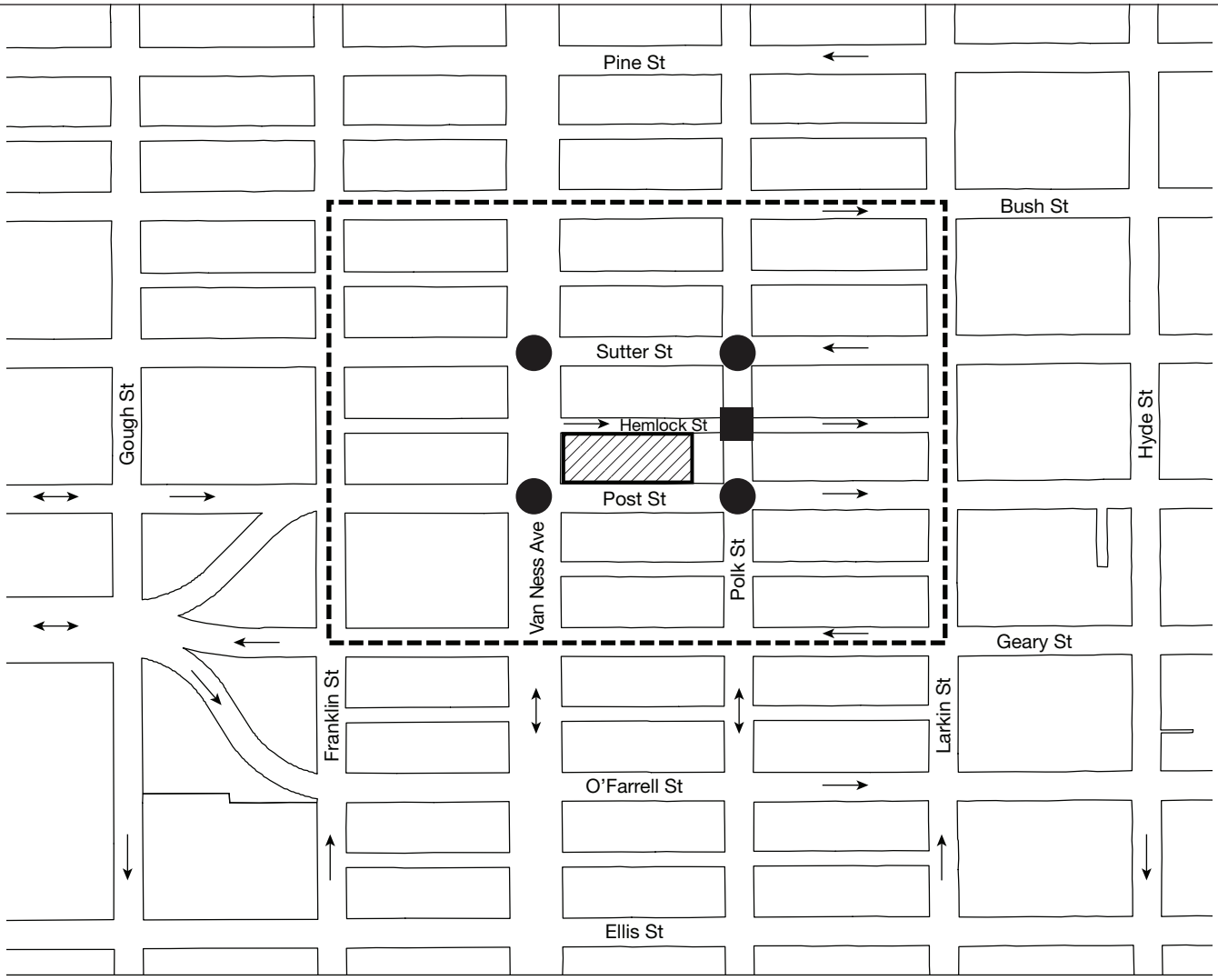
The project site is located within a developed city block bounded by Hemlock Street to the north, Polk Street to the east, Post Street to the south, and Van Ness Avenue to the west. The project site has frontages on Van Ness Avenue, Post Street and Hemlock Street. See **Figure 19, Transportation Study Area**, p. 54. Vehicular access to the existing parking garage and off-street loading facilities on the project site is provided via a driveway on Post Street and two driveways on Hemlock Street. Pedestrian access to the existing building is from Van Ness Avenue and Post Street.

As discussed in Section D, Summary of Environmental Effects, the Van Ness Improvement Project/Van Ness BRT project is currently under construction adjacent to the project site on Van Ness Avenue and will be completed in 2022. As part of that project, two travel lanes will be provided on Van Ness Avenue in each direction, separated by median transit-only lanes. Also, as part of the Van Ness Improvement Project, a bulbout into Van Ness Avenue will be provided at Post Street, and new sidewalk curb ramps will be provided at Post Street and at Hemlock Street. The curb lane between the bulbout at Post Street and Hemlock Street will be used for on-street parking or other curbside use. The proposed project was designed considering the final configuration of the Van Ness Improvement/Van Ness BRT project.

***Walking Conditions.*** Adjacent to the project site, sidewalks widths are 16 feet wide on Van Ness Avenue, 9 feet wide on Post Street, and 7 feet wide on Hemlock Street.

[23] The guidelines were updated in 2019. The updated guidelines include revised guidance on travel demand and updated trip generation rates. The updated guidelines are available here: http://default.sfplanning.org/publications_reports/TIA_Guidelines.pdf.

[24] LCW Consulting, *Technical Memorandum – 1200 Van Ness Avenue Project CEQA Analysis – Project Travel Demand*, May 6, 2021.




PROJECT SITE

TRANSPORTATION STUDY AREA

SIGNALIZED STUDY INTERSECTION

UNSIGNALIZED STUDY INTERSECTION

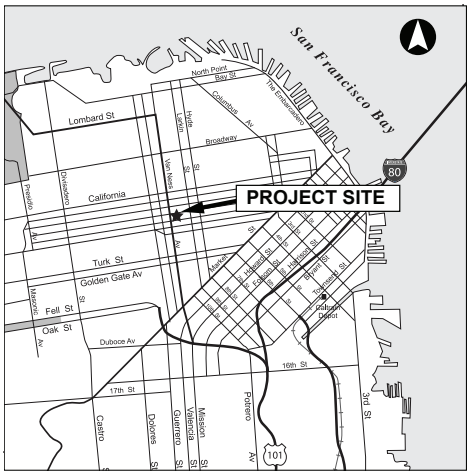



**FIGURE 19**

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0 200 400

FEET

SOURCE: LCW Consulting, 2021

*1200 Van Ness Avenue Project*
Transportation Study Area

Under the Better Streets Plan, Van Ness Avenue is classified as a commercial throughway and Post Street is classified as a downtown residential street; both street types call for a minimum sidewalk width of 12 feet and recommended sidewalk width of 15 feet. Hemlock Street is classified as an alley with a minimum sidewalk width of 6 feet and recommended width of 9 feet. Thus, the existing sidewalk widths on Van Ness Avenue and Hemlock Street currently meet the minimum sidewalk widths described in the Better Streets Plan, while the sidewalk on Post Street does not. Pedestrian crosswalks and ADA-accessible curb ramps are provided at the signalized intersections of Van Ness Avenue at Post Street and at Polk Street. Pedestrian signals, including countdown signals, are provided at the signalized intersection of Polk Street/Post Street. At the signalized intersection of Van Ness Avenue/Post Street, there are no pedestrian crossing signals for the pedestrian crossing across Van Ness Avenue, while pedestrian crossing signals are provided for the crossing across Post Street. As part of the Van Ness Improvement Project/Van Ness BRT project, accessible pedestrian signals with crossing time countdowns will be provided at all signalized intersections on the Van Ness Avenue corridor.[25]

Van Ness Avenue, Post Street, and Polk Street are designated as Vision Zero Corridors and are in the Vision Zero High Injury Network. The City and County of San Francisco adopted Vision Zero in 2014. Vision Zero is a road safety policy with the goal of eliminating traffic deaths in San Francisco by 2024. Implemented and ongoing Vision Zero projects in the vicinity of the project site include the Van Ness Improvement Project and SFMTA Vision Zero citywide project to adjust traffic signals, including at the intersection of Van Ness Avenue/Post Street in 2015.

***Bicycling Conditions.*** Bicycle facilities are typically classified as class I, class II, class III, or class IV facilities.[26] In the vicinity of the project site, class II and class IV bicycle lanes are provided on Polk Street (northbound and southbound); Polk Street between Pine and McAllister streets and Grove and Market streets contains a bicycle lane that is buffered from vehicle traffic and considered a class IV bikeway. Class III signed bicycle routes are provided on Sutter (westbound) and Post (eastbound) streets. Adjacent to the project site there are two bicycle racks on Post Street. The nearest public bike share stations to the project site are located on Fern Street at Polk Street, on Myrtle at Polk Street, and on Hyde Street at Post Street. Combined, these three stations have a capacity for up to 46 bicycles.

***Public Transit Conditions.*** The project vicinity is served by public transit.[27] The project site can be accessed by a number of Muni bus routes including: the 2 Clement, 3 Jackson, 19 Polk, 31 Balboa, 38 Geary, 38R Geary Rapid, 47 Van Ness, 49 Van Ness/Mission and the California Cable Car, all of which run within a 0.25-mile radius of the project site. In addition to Muni service, the following regional transit services operate within San Francisco and are accessible from the project site via Muni or other ways of travel: Bay Area Rapid Transit (BART), Golden Gate Transit, Alameda-Contra Costa County Transit District (AC Transit), Caltrain, and San Mateo County Transit District (SamTrans). The BART stations most easily accessible to the project site are the Civic Center and the Powell Street stations, both located approximately 1 mile south of the project.

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25 Van Ness Avenue BRT Project, Addendum to Environmental Impact Report, March 2016. Available online at https://www.sfcta.org/sites/default/files/2019-02/VanNessBRT%20Addendum%202016.03.02_Final_Signed.pdf

26 Class I bikeways are bike paths with exclusive rights-of-way for use by people bicycling or people walking. Class II bikeways are striped within the paved areas of roadways and established for the preferential use of people bicycling in separated bicycle lanes. Separated bicycle lanes provide a striped, marked, and signed lane that is buffered from vehicular traffic. These facilities, which are located on roadways, reserve 4 to 5 feet of space for bicycle traffic exclusively. Class III bikeways are signed bicycle routes that allow people bicycling to share travel lanes with vehicles and may include shared-lane markings such as "sharrows" that allow bicyclists to share the roadway with vehicles. A class IV bikeway is an exclusive bicycle facility that is separated from vehicular traffic by a buffer zone (also referred to as a cycle track). The separation from vehicular traffic could be by grade separations, flexible posts, inflexible physical barriers, or on-street vehicular parking.

27 Transit services presented herein reflect conditions prior to the onset of transit service changes resulting from the COVID-19 pandemic.

The Golden Gate Transit bus routes that service the project site include routes 10, 54, 70, 93, 101 and 101X, with stops on Van Ness Avenue. Golden Gate Transit also operates ferry service between the North Bay and San Francisco, connecting Larkspur and Sausalito with the Ferry Building during the morning and evening commute periods. The Ferry Building is approximately two miles east of the project site. AC Transit operates out of the Salesforce Transit Center, located approximately two miles east of the project site. The nearest Caltrain station is the Fourth/King station, which is located approximately two miles southeast of the project site. SamTrans routes serving downtown San Francisco do not make local stops within 0.25 miles of the project site; however, SamTrans service operating along Mission Street can be accessed via Muni 19 Polk, 47 Van Ness, and 49 Van Ness/Mission routes.

***Loading Conditions.*** On-street commercial loading spaces (yellow zones or metered spaces) are reserved for use by vehicles with San Francisco commercial permit stickers or similar commercial trucks, while passenger loading/unloading zones (i.e., white zones) provide a place to load and unload passengers for adjacent businesses and residences. There are two on-street commercial metered loading spaces adjacent to the project site on Hemlock Street. In addition, there are three general metered parking spaces on Post Street adjacent to the project site that are used as passenger loading spaces between 8 a.m. and 4:30 p.m., Mondays through Fridays. These combined general parking/passenger loading spaces on Post Street serve the existing health service uses at the project site.

**PROJECT TRAVEL DEMAND**

As described in Section A, Proposed Project, the proposed project would include 107 residential units, 106,700 gsf of health service uses, 24,520 gsf of commercial retail uses, and 4,340 gsf of restaurant uses. As summarized in Table 1, p. 2, the proposed project includes 275 vehicle parking spaces, five car share spaces, four off-street loading spaces, five on-street loading spaces (an increase of two compared to existing conditions), 127 class 1 bicycle parking spaces, and 26 class 2 bicycle parking spaces.

Estimated weekday daily and p.m. peak hour *project person*[28] trip generation (**Table 4, Project Daily and P.M. Peak Hour Trip Generation by Way of Travel**, p. 57) was performed pursuant to methodologies outlined in the San Francisco Guidelines. The p.m. peak hour vehicle trip generation includes a credit or subtraction of existing vehicle trips that are generated from the existing 192-space parking garage on the project site. The detailed methodology and results for the travel demand is included in the travel demand memorandum.[29]

The proposed project is expected to generate approximately 9,183 daily and 833 p.m. peak hour person trips. During the p.m. peak hour the proposed project is expected to generate approximately 243 net-new vehicle trips, including trips made by taxis and transportation network company (TNC) vehicles (e.g. Uber and Lyft).

[28] A person trip is a trip made by one person by any means of transportation (vehicle, transit, walking, bicycling, etc.).
[29] LCW Consulting, *Technical Memorandum – 1200 Van Ness Avenue Project CEQA Analysis – Project Travel Demand*, May 6, 2021.

## Table 4: Project Daily and P.M. Peak Hour Trip Generation by Way of Travel

| Analysis Period | | Person Trips by Way of Travel | | | | | | Vehicle Trips [1] |
|---|---|---|---|---|---|---|---|---|
| | | Auto | Taxi/TNC | Transit | Walk | Bicycle | Total | |
| **DAILY** | | | | | | | | |
| All Land Uses | | 2,933 | 529 | 1,919 | 3,536 | 266 | 9,183 | 3,070 |
| | | 32% | 6% | 21% | 38% | 3% | 100% | |
| **P.M. PEAK HOUR** | | | | | | | | |
| Residential | 155 bedrooms | 24 | 2 | 12 | 21 | 3 | 62 | 19 |
| Health service | 106,700 gsf | 122 | 36 | 102 | 56 | 9 | 325 | 162 |
| Retail | 24,520 gsf | 86 | 4 | 39 | 191 | 9 | 329 | 67 |
| Restaurant | 4,340 gsf | 30 | 2 | 14 | 68 | 3 | 117 | 24 |
| | Total | 262 | 44 | 167 | 336 | 24 | 833 | 272 |
| | | 32% | 5% | 20% | 40% | 3% | 100% | |
| | | | | | | | Credit for Existing Uses | -29 |
| | | | | | | | Net-New P.M. Peak Hour Vehicle Trips | 243 |

Source: SF Guidelines, LCW Consulting, 2021
Note: Existing vehicle trips based on vehicle counts into and out of the existing garage conducted on September 26, 2017.
[1] Transportation network company (TNC) vehicles (e.g., Uber, Lyft) and taxi trips are included in vehicle trips and automobile person trips. Taxi/TNC vehicle trips were doubled to account for separate vehicle trips both to and from the project site.

The person and vehicle trips were distributed to various points of trip origin or destination, inbound and outbound, for each of the project's specific proposed land uses. Specifically, the trip origins and destinations were allocated to the eight San Francisco neighborhoods and the East Bay, North Bay, and South Bay as shown below in **Table 5, Project Vehicle and Transit Person Trip Generation By Place of Origin or Destination – Weekday P.M. Peak Hour**, p. 58. A summary of the inbound and outbound vehicle trips and transit person trips for the p.m. peak hour by place of origin or destination is also provided in Table 5.

The p.m. peak hour project vehicle trips were then assigned to the roadway network based on projected paths of travel to and from the entry and exit driveways, on-site and on-street loading facilities, as well as the proposed changes to Hemlock Street operations. Hemlock Street west of the proposed garage exit (i.e., between Van Ness Avenue and the garage exit) would be converted to two-way, while Hemlock Street between the garage exit and Polk Street would remain one-way eastbound. As a result, the vehicle assignment assumes that vehicles exiting the project site onto Hemlock Street would be able to turn left to access Van Ness Avenue northbound or turn right to access southbound Polk Street (i.e., left turns onto Polk Street would be prohibited).

The proposed project includes a request for on-street passenger loading zones adjacent to the project site on Van Ness Avenue and on Post Street for the proposed residential, retail, restaurant, and health service uses. In addition, the proposed project would have a ground floor interior passenger loading area and a below-grade garage that would be accessed via driveways on Post and Hemlock streets. Under the proposed project, drivers would enter the on-site passenger loading area and garage from Post Street and exit onto Hemlock Street.

**Table 5: Project Vehicle and Transit Person Trip Generation By Place of Origin or Destination – Weekday P.M. Peak Hour**

| Place of Trip Origin or Destination | Vehicle Trips [1] | | | Transit Person Trips | | |
|---|---|---|---|---|---|---|
| | In | Out | Total | In | Out | Total |
| **SAN FRANCISCO NEIGHBORHOODS** | | | | | | |
| Downtown/North Beach | 12 | 7 | 19 | 23 | 44 | 67 |
| South of Market | 3 | 4 | 7 | 1 | 2 | 3 |
| Marina/Western Market | 16 | 22 | 38 | 5 | 26 | 31 |
| Mission/Potrero Hill | 7 | 19 | 26 | 2 | 5 | 7 |
| Outer Mission/Hills | 6 | 7 | 13 | 1 | 11 | 12 |
| Bayshore | 1 | 1 | 2 | 0 | 0 | 0 |
| Richmond | 6 | 11 | 17 | 0 | 9 | 9 |
| Sunset | 7 | 19 | 26 | 4 | 4 | 8 |
| Treasure Island | 0 | 0 | 0 | 0 | 0 | 0 |
| **OTHER BAY AREA** | | | | | | |
| South Bay | 12 | 35 | 47 | 1 | 1 | 2 |
| East Bay | 14 | 16 | 30 | 2 | 25 | 27 |
| North Bay | 5 | 13 | 18 | 0 | 1 | 1 |
| **Total** | **89** | **154** | **243** | **39** | **128** | **167** |

Source: SF Guidelines, LCW Consulting, 2021
Note: Due to rounding, numbers may not add up to 100 percent
[1] Vehicle trips reflect net-new vehicle trips, and include all vehicles, including taxis and TNC vehicles (e.g., Uber, Lyft). Of the 89 inbound vehicle trips, 36 would be taxi/TNC vehicle trips, and of the 154 outbound vehicles trips, 36 would be taxi/TNC vehicle trips).

Under existing plus project conditions, study intersections that would experience the largest increases in traffic volumes due to project-generated vehicle trips would be Van Ness Avenue/Post Street and Polk Street/Post Street as they provide access to the project's parking garage and on-site passenger loading zones, and to and from the on-street passenger loading zones. A figure presenting the vehicle trip assignment is included in the travel demand memorandum.[30]

As shown in **Table 6, Project Daily Trucks and Service Vehicles and Loading Space Demand by Land Use**, p. 59, the proposed project would generate a total of 47 delivery and service vehicle trips per day, which corresponds to a demand for three loading spaces during the peak hour of loading activities (generally between 10 a.m. and 11 a.m.).

The proposed project passenger loading space demand by land use is presented on **Table 7, Proposed Project P.M. Peak Hour Loading Space Demand by Land Use**, p. 59. The proposed project would result in a p.m. peak hour passenger loading space demand of two spaces during the peak 15 minutes of the p.m. peak hour.

[30] LCW Consulting, *Technical Memorandum – 1200 Van Ness Avenue Project CEQA Analysis – Project Travel Demand*, May 6, 2021.

## Table 6: Project Daily Trucks and Service Vehicles and Loading Space Demand by Land Use

| Land Use | Daily Delivery and Service Vehicles | Average Hour Delivery/Service Vehicle Loading Space Demand[1] | Peak Hour Delivery/Service Vehicle Loading Space Demand [1] |
|---|---|---|---|
| Residential | 4 | 0.18 | 0.23 |
| Health service | 22 | 1.04 | 1.30 |
| Retail | 5 | 0.25 | 0.31 |
| Restaurant | 16 | 0.72 | 0.90 |
| **Total** | **47** | **2.19** | **2.74** |
| **Delivery/Service Vehicle Loading Space Demand[2]** | | **2** | **3** |

Source: SF Guidelines, LCW Consulting, 2021

[1] Freight loading demand is presented as the number of delivery and service vehicle loading spaces per time period. The peak period of freight loading demand typically occurs between 10 a.m. and 1 p.m. and does not coincide with the weekday a.m. and p.m. peak periods.

[2] During the weekday peak period of loading demand, the average freight loading space demand would be slightly more than two spaces during the average hour of loading demand and slightly less than three spaces during the peak hour of loading demand and is rounded to two spaces during the average hour, and three spaces during the peak hour.

## Table 7: Proposed Project P.M. Peak Hour Passenger Loading Space Demand by Land Use

| Land Use | P.M. Peak Hour Average Loading Space Demand[1] | P.M. Peak Hour Peak 15-Minute Loading Space Demand |
|---|---|---|
| Residential | 0.07 | 0.15 |
| Health service | 0.38 | 0.77 |
| Retail | 0.29 | 0.57 |
| Restaurant | 0.10 | 0.20 |
| **Total** | **0.84** | **1.69** |
| **Passenger Loading Space Demand[2]** | **1** | **2** |

Source: SF Guidelines, LCW Consulting, 2021

[1] Passenger loading demand is presented as the passenger loading trips estimated to occur during the peak period. The peak period of demand occurs during the extended weekday p.m. peak period of 3 p.m. to 7 p.m.

[2] During the weekday p.m. peak period, the average passenger loading space demand would be less than one space on average and less than two spaces during the peak 15-minute loading period, and is rounded up to one space on average, and two spaces during the peak 15-minutes during the p.m. peak hour.

### EXISTING PLUS PROJECT IMPACT ASSESSMENT

**Impact TR-1: Construction of the proposed project would not require a substantially extended duration or intense activity and the secondary effects would not create potentially hazardous conditions for people walking, bicycling, or driving; or interfere with accessibility for people walking or bicycling; or substantially delay public transit. (Less than Significant)**

The SF Guidelines set forth screening criteria for types of construction activities that typically would not result in significant construction-related transportation effects based on project site context[31] and construction duration and magnitude. The project's construction is not expected to require substantial extended duration or intense activity, as described below.

The project would be constructed in six phases over an approximately two-year period. During the construction period, the number of construction trucks traveling to and from the site would vary depending on the phase and the type of construction activity. During the construction period, there would be a flow of construction-related trucks to and from the project site, which could result in temporary lower capacities of local streets due to the slower movement and larger turning radii of trucks. The peak number of construction trucks would occur during the excavation and shoring phase, with an average of 28 trucks per day and peak of 97 trucks per day, with truck activity likely concentrated during the morning and midday periods. Construction activities would also generate construction worker trips to and from the project site and temporary demand for vehicle parking and public transit.

Proposed project construction staging would occur on site and within the sidewalks adjacent to the project site. Changes to the transportation circulation network in the project area related to construction activities (e.g., travel lane or sidewalk closures) would be temporary and of limited duration. On-street parking adjacent to the project site on Van Ness Avenue, Hemlock Street, and Post Street would be temporarily removed for the duration of construction. Access into the construction site would primarily be from Post Street, with Van Ness Avenue and Hemlock Street also providing access to the construction site. Some periodic vehicular lane closures would be required (e.g., during deliveries of large pieces of construction equipment, erection/dismantling of tower cranes, and work involving oversized construction materials). The construction contractor has indicated that travel lane closures would be required on Post Street for up to three consecutive days, for a cumulative total of 26 days over the course of project construction. A temporary travel lane closure would also be required on northbound Van Ness Avenue adjacent to the project site for two separate concrete pours and intermittent utility work. To the extent possible, travel lane closures would be conducted on weekends when activity associated with people walking, transit, and vehicular traffic adjacent to the site is lower. Emergency access and public transit access on all streets and stops adjacent to the site would be maintained throughout construction.

The sidewalks adjacent to the project site on Hemlock Street would be closed, and pedestrians would be directed to use the sidewalk on the north side of Hemlock Street. On Van Ness Avenue and Post Street, the sidewalks adjacent to the project site would also need to be closed; however, covered pedestrian walkways would be provided in the adjacent parking lane.

Construction activities in San Francisco that have the potential to affect the transportation network are subject to the San Francisco Municipal Transportation Agency Regulations for Working in San Francisco Streets, also known as the "blue book," as well as the public works code and public works department

[31] "Site context" in relation to construction transportation analysis refers to how people travel to and around the project area and how that may be affected by construction activities. Site context is further defined in the Appendix N of the 2019 guidelines (see Attachment A of Appendix N) available at: https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines. Accessed December 16, 2020.

orders.[32] The blue book establishes rules for working safely and causing the least possible interference with people walking, bicycling, taking transit and/or transit operations, as well as people driving.

Per the SFMTA blue book, construction activities that affect travel lanes on Post Street are restricted between 7 a.m. and 9 a.m. and between 3 p.m. and 7 p.m. every day. Construction activities affecting Van Ness Avenue are also subject to Caltrans encroachment permits. The project sponsor would coordinate with Caltrans and acquire such encroachment permits as needed.

If project construction activities are not able to comply with the blue book, the contractor must apply for a special traffic permit from the SFMTA. SFMTA staff would specify conditions in the special traffic permit for safe travel in and around the project site. Examples of the types of work addressed through special traffic permits include sidewalk, alley, and street closures, temporary relocation of transit stops and/or routes, and closing or detouring a bicycle route. Additionally, all traffic control implemented as part of any special traffic permit conditions would be required to conform to the California Manual of Uniform Traffic Control Devices.[33] With respect to public works' policy, a safe and accessible path of travel must be provided for all people walking, including those with disabilities, around construction sites.[34] To that end, the public works code includes requirements related to excavation in the public right-of-way and may require the development and implementation of a contractor parking plan. In addition to these, the contractor would be responsible for complying with all city, state and federal codes, rules and regulations.

Overall, construction activities would be temporary and phased, would not involve a substantially intense activity, and would be conducted in accordance with city requirements. Therefore, construction of the proposed project would not create potentially hazardous conditions for people walking, bicycling, driving or riding transit, interfere with emergency access, or interfere with accessibility for people walking, bicycling, or substantially delay transit, and construction transportation impacts would be less than significant and no mitigation would be required.

**Impact TR-2: Operation of the proposed project would not create potentially hazardous conditions for people walking, bicycling, driving or public transit operations. (Less than Significant)**

The project proposes the following transportation changes to the public right-of-way,[35] none of which would cause potentially hazardous conditions:

***Van Ness Avenue***

- On the Van Ness Avenue project curb frontage, the project would provide a 53-foot-long passenger loading space and a 20-foot-long red zone at the approach to Hemlock Street.

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32 San Francisco Municipal Transportation Agency, *City and County of San Francisco Regulations for Working in San Francisco Streets*, January 2012, *https://www.sfmta.com/reports/construction-regulations-blue-book,* accessed November 2020.

33 California Department of Transportation, *2014 California Manual of Uniform Traffic Control Devices Rev 5*, March 2020, *https://dot.ca.gov/programs/safety-programs/camutcd*, accessed November 2020.

34 San Francisco Public Works, *Guidelines for the Placement of Barricades at Construction Sites (ORDER NO. 167,840)*, 2008, http://sfpublicworks.org/sites/default/files/Guidelines_for_Placement_of_Barricades_0.pdf, accessed November 2020.

35 The project sponsor is proposing these changes after consultation with various city agencies, including the planning department, SFMTA, and public works.

- On Van Ness Avenue/Post Street, the project would construct a 6-foot-wide sidewalk bulbout onto Post Street. This bulbout would be compatible with the planned Van Ness Improvement Project bulbout onto Van Ness Avenue at this intersection.

***Post Street***

- The project would relocate an existing driveway and reconfigure on-street parking from 11 general parking spaces and three combined passenger loading/metered parking spaces to a commercial loading zone (83 feet) and two passenger loading zones (158 feet). The driveway curb cut would be 13 feet, 7 inches wide, inclusive of the transition slopes on either side of the driveway.

- The project's new building would be set back 6 inches from the existing Post Street sidewalk to provide a 9.5-foot-wide sidewalk. In addition, the project would provide 14 bicycle racks (26 class 2 bicycle parking spaces) on the Post Street sidewalk.

***Hemlock Street***

- The project would convert the existing one-way segment of Hemlock Street west of the project driveway (i.e., the garage exit) to a two-way street, install a stop sign at the new westbound approach to Van Ness Avenue, and prohibit left turns from eastbound Hemlock Street onto Polk Street.

- The project would remove one of the two existing driveways and relocate a driveway (i.e., the garage exit located about 140 feet east of Van Ness Avenue) to about 200 feet east of Van Ness Avenue. The driveway curb cut would be 13 feet, 7 inches wide, inclusive of the transition slopes on either side of the driveway.

- The project would remove on-street parking and parking meters on the south side of Hemlock Street between Van Ness Avenue and the project driveway and convert four general parking spaces east of this project driveway to commercial metered spaces. Adjacent to the project site, one accessible (blue) space, three short-term (green) metered parking spaces, two commercial metered loading spaces, and eight general metered parking spaces would be removed. The nearest accessible parking space is located on the west side of Polk Street immediately south of Hemlock Street (about 80 feet east of the project site).

- The sidewalk width of 7 feet, 1 inch for the project frontage along Hemlock Street would remain clear of poles, trees or street furniture.

The design of these changes would be consistent with *Better Streets Plan* guidelines. The street network changes would be required to undergo review by the SFMTA Transportation Advisory Committee, which includes representatives from Public Works, the SFMTA, the San Francisco Fire Department, the San Francisco Planning Department, the San Francisco Police Department, the Port of San Francisco, and the San Francisco Department of Public Health.

***Walking and Bicycling.*** Pedestrian access to the residential and health service building lobbies would be on Post Street, and access to the ground floor retail would be on Van Ness Avenue and Post Street. In addition, four residential units would be accessible from Hemlock Street. During the p.m. peak hour, the project would add 503 trips by walking (including walk-only and walk-to-transit trips), and these trips would be primarily on Van Ness Avenue and Post Street. The additional trips by walking would be accommodated in

the sidewalks and crosswalks at intersections without creating overcrowded conditions that could lead to potentially hazardous conditions.

The project's street network changes would enhance the environment and safety for people walking adjacent to the project site on Post Street. On Post Street, between Van Ness Avenue and the eastern border of the project site, the proposed building would be set back 6 inches from the existing sidewalk to effectively provide a 9.5-foot-wide sidewalk adjacent to the project site on Post Street with a clear pedestrian throughway of six feet. On Hemlock Street, parking meters, street signs and poles would be removed from the sidewalk adjacent to the project site to provide a wider *effective walkway width*[36] for people walking. As Hemlock Street is an alley with access to garages and on-site loading for buildings north of the project site, the sidewalk adjacent to site would primarily be used to access the four residential units on site directly accessible from Hemlock Street. These changes on Post and Hemlock streets along the project frontage would increase the effective walkway width for people walking and improve walking conditions compared to existing conditions.

The single-lane driveway exit onto Hemlock Street would have an audible and/or visual warning systems for people walking or bicycling on Hemlock Street as project vehicles exit onto Hemlock Street. During the p.m. peak hour there would be about 106 project-generated vehicles exiting onto Hemlock Street. The proposed project would not substantially increase the number of people walking on Hemlock Street and the driveway would not create potentially hazardous conditions for people walking or bicycling due to the low existing volumes of vehicles and people walking and bicycling, and the low vehicle travel speeds as vehicles exit the project driveway. In addition, the project driveway would be designed to provide adequate sight distances for drivers and people walking and bicycling.

Bicycle access to the site would be via Hemlock Street and the garage ramp. A 4-foot-wide dedicated bicycle ramp would be provided for inbound and outbound bicycle travel (adjacent to and separated from the vehicle exit ramp), thereby providing safe access for bicyclists to and from the on-site bicycle parking within the garage.

At the signalized intersection of Van Ness Avenue/Post Street, the proposed corner bulbout into Post Street would shorten the pedestrian crossing distance across Post Street and would increase the visibility of pedestrians to drivers by placing crossing pedestrians into the turning drivers' line of sight farther in advance. The corner bulbout would also reduce the likelihood of a pedestrian collision by shortening pedestrians' exposure to vehicle traffic and lessen the chance of drivers failing to yield to pedestrians in a crosswalk.

At the unsignalized intersection of Polk Street/Hemlock Street vehicles would be subject to a right-turn-only regulation, which would improve safety at this intersection by reducing the number and types of conflict points (i.e., the number and locations where the travel paths of two different vehicles, bicyclists, or people walking may cross).[37] During the weekday p.m. peak hour there would be about 79 vehicles turning right, including 68 project-generated trips. The project would increase the number of vehicle trips across the crosswalk and bicycle lane at this unsignalized intersection where eastbound Hemlock Street is stop sign controlled. The increase in vehicles is not expected to create a potentially hazardous condition because the

[36] The effective sidewalk width represents the width of sidewalk available for travel after taking into account street furniture and sides of buildings.

[37] More conflict points represent an increase in risk exposure, and therefore, minimizing the number of conflict points enhances safety.

single eastbound travel lane on Hemlock Street would have sufficient capacity to accommodate the expected volume of vehicles, right-turning vehicle movements are a safer movement than vehicles crossing through perpendicular vehicle and bicycle traffic, and the merge of eastbound Hemlock Street vehicles with southbound ~~Post~~ Polk Street traffic flow would take place after a full stop and would occur at a slow travel speed. The proposed conversion of the segment of Hemlock Street to two-way west of the building exit would distribute project-generated trips to two streets (i.e., to northbound Van Ness Avenue and to southbound Polk Street) and reduce the number of vehicles crossing the bicycle lane on Polk Street than if the existing one-way eastbound configuration of Hemlock Street were to be maintained.

At the unsignalized intersection of Van Ness Avenue/Hemlock Street, conversion of one-way Hemlock Street to two-way would introduce a new vehicular movement across the crosswalk (i.e., a right-turn-only movement onto northbound Van Ness Avenue). Adjacent to the project site, the curb at the approach to Hemlock Street would be daylighted[38] for a distance of 20 feet, which would provide sight distance for drivers exiting Hemlock Street to see other vehicles and people walking or bicycling on Van Ness Avenue. During the p.m. peak hour there would be about 49 vehicles turning right onto northbound Van Ness Avenue, including 38 project-generated trips, and for the reasons stated above, these project-related vehicle turning movements would not create potentially hazardous conditions for people walking or bicycling.

To access the project driveway to the on-site loading area and project garage on Post Street, vehicles would turn left from eastbound Post Street across the sidewalk into the single lane driveway, similar to existing conditions. However, vehicles would only be entering the garage and passenger loading area (and not entering and exiting as under existing conditions). During the p.m. peak hour there would be about 49 vehicles per hour entering the garage/loading area. Both the lane accessing the on-site passenger loading area and the ramp to the below-grade garage levels have adequate queuing distance on site to accommodate vehicles queued to access either location without the queue backing into the Post Street sidewalk.

For the reasons described above, the proposed project would not create potentially hazardous conditions for people walking or bicycling.

***Driving and Public Transit Operations.*** On Hemlock Street, the conversion of the street west of the project driveway from one-way to two-way would be implemented consistent with SFMTA and California Manual of Uniform Traffic Control Devices standards. Hemlock Street is a low-volume local access street, and the proposed project would not create potentially hazardous conditions for people driving. The removal of on-street parking on Hemlock Street west of the project driveway would provide adequate sightlines between non-project vehicles on Hemlock Street and project vehicles exiting the project garage/on-site passenger loading area.

On Post Street, the project would continue to include one driveway for access into the garage and this driveway would also be used for the on-site passenger loading area for the health service uses. Thus, the project would not change the adjacent travel lanes or transit operations for the 2 Clement and 3 Jackson bus routes, or the existing bus stop on the south side of Post Street east of Van Ness Avenue. None of the other project features would create traffic hazards (e.g., sharp curves or dangerous intersections), or increase the number or severity of conflicts between vehicles and other ways people travel.

[38] Daylighting is the removal of vehicular parking near intersections and crosswalks to improve the sightline distance and visibility for people.

For the reasons described above, the proposed project would not create potentially hazardous conditions for people driving or transit operations.

Based on the above, the proposed project would not create potentially hazardous conditions for people walking, bicycling, driving, or riding public transit. Impacts would be less than significant and no mitigation would be required.

**Impact TR-3: Operation of the project would not interfere with accessibility of people walking or bicycling to and from the project site, and adjoining areas, or result in inadequate emergency access. (Less than Significant)**

As discussed above, the proposed project would generate 9,183 daily and 833 p.m. peak hour person trips. During the p.m. peak hour the proposed project would generate 243 net-new vehicle trips (including 72 trips by taxi/TNC vehicles) and would add 167 transit trips, 336 walk trips, and 24 trips by bicycling and other ways of travel. The proposed project does not involve substantial changes to the street network that would interfere with walking or bicycling to and from the project site and adjoining areas, or result in inadequate emergency access.

***Walking and Bicycling.*** Existing pedestrian activity in the project vicinity is concentrated on Polk Street and Van Ness Avenue, while bicyclists travel within the Polk Street bicycle lanes and share the travel lanes with vehicles on Post Street (Post Street is a class III bicycle facility). Pedestrian access to the project site would continue to occur primarily from Post Street and Van Ness Avenue; pedestrian travel on Hemlock Street would be primarily associated with the four proposed residential units fronting on Hemlock Street.

In addition, the design of the project's driveways would be able to accommodate the anticipated number of vehicle trips without blocking access to a substantial number of people walking within the sidewalks or people bicycling in the shared lane on Post Street. Further, the project would include several changes to the public right-of-way that would lessen impacts. For example, the proposed changes to the Hemlock Street sidewalk along the project frontage would widen the effective walkway width by removing the parking meters and poles. On Post Street the proposed building would be set back 6 inches from the existing sidewalk to provide a 9.5-foot-wide sidewalk and the project would add a bulbout onto Post Street at Van Ness Avenue, which would enhance the walking network adjacent to the project site.

For the reasons above, the proposed project would not interfere with accessibility of people walking or bicycling.

***Emergency Access.*** Current emergency vehicle access to the project site is via Van Ness Avenue and Post Street. Under existing plus project conditions emergency access routes to the proposed project site would remain unchanged compared with existing conditions. Conversion of Hemlock Street between Van Ness Avenue and the project driveway from one-way to two-way by removing on-street parking would not substantially affect vehicular access to the project site and the proposed project would not introduce any other design features or street network changes that would change or adversely affect emergency vehicle travel adjacent to the project site. The proposed project would add vehicles to nearby streets; however, the increase in the number of vehicles would not be substantial compared to existing traffic volumes and would not hinder the movements of emergency vehicles in the project vicinity. Therefore, the proposed project would not result in inadequate emergency access.

Based on the information above, the proposed project's operations would not interfere with accessibility of people walking or bicycling to and from the project site, and to and from adjoining areas, or result in inadequate emergency access. Project accessibility impacts would therefore be less than significant and no mitigation would be required.

**Impact TR-4: Operation of the proposed project would not substantially delay public transit. (Less than Significant)**

The project site is located near many major local and regional transit routes. North-south service is provided via the 19 Polk bus route on Polk Street and the 47 Van Ness and 49 Van Ness/Mission bus routes on Van Ness Avenue. In addition, Golden Gate Transit service on Van Ness Avenue provides regional connections, including the 4C, 24C, 30, 54C, 70, 101 and 101X routes with service to Marin county, Sonoma county and Richmond/East Bay. The Muni 2 Clement and 3 Jackson routes on the Sutter (westbound) and Post (eastbound) streets, and the 38 Geary and 38 Geary Rapid on Geary Street/Boulevard and O'Farrell Street provide east-west service.

The SF Guidelines set forth a screening criterion for projects that would typically not result in significant public transit delay effects. The proposed project would generate 243 net-new vehicle trips during the p.m. peak hour (89 inbound and 154 outbound), which is less than the screening criterion of 300 peak hour vehicles. Therefore, the project meets the screening criterion and transit delay impacts are less than significant.[39]

For informational purposes, the proposed project's vehicle trips to and from the project garage would be distributed between Post Street (inbound) and Hemlock Street (outbound), and outbound vehicles would be distributed to Van Ness Avenue and Polk Street. On Post Street the 2 Clement and 3 Jackson routes travel within the transit-only lane on the south side of the street (i.e., not adjacent to the project site), and therefore driveway operations would not conflict with these bus routes. In addition, the proposed project would not relocate any existing transit amenities or service.

In summary, the proposed project would not add a substantial number of new peak hour vehicle trips to roadways with transit service. Thus, the proposed project's impact on transit service delay would be less than significant and no mitigation would be required.

**Impact TR-5: Operation of the proposed project would not cause substantial additional VMT. (Less than Significant)**

Vehicle miles traveled per person (or per capita) is a measurement of the amount and distance that a resident, an employee, or a visitor drives, accounting for the number of passengers within a vehicle. In general, higher VMT areas are associated with more air pollution, including greenhouse gas emissions and energy use, than lower VMT areas. Many interdependent factors affect the amount and distance a person might drive. In particular, the built environment affects how many places a person can access within a given distance, time, and cost, using different ways of travels (e.g., private vehicle, public transit, bicycling, walking, etc.). Typically, low-density development located at great distances from other land uses and in areas with few options for ways of travel provides less access than a location with high density, mix of land

[39] SF Planning Department, Transportation Impact Analysis (TIA) Guidelines. Available at: http://default.sfplanning.org/publications_reports/TIA_Guidelines.pdf. Appendix I of the TIA Guidelines describes the transit delay screening criteria.

uses, and numerous ways of travel. Therefore, low-density development typically generates more VMT compared to a similarly sized development located in urban areas, such as the project site.

Given these travel behavior factors, on average, persons living or working in San Francisco result in lower amounts of VMT per person than persons living or working elsewhere in the nine-county San Francisco Bay Area region. In addition, on average, persons living or working in some areas of San Francisco result in lower amounts of VMT per person than persons living or working elsewhere in San Francisco. The city displays different amounts of VMT per capita geographically through transportation analysis zones (TAZs).

The San Francisco County Transportation Authority uses the San Francisco chained activity modeling process to estimate VMT by private automobiles and taxis for different TAZs. The transportation authority calibrates travel behavior in the model based on observed behavior from the California Household Travel Survey 2010-2012, census data regarding automobile ownership rates and county-to-county worker flows, and observed vehicle counts and transit boardings. The model uses a synthetic population, which is a set of individual actors that represents the Bay Area's actual population, who make simulated travel decisions for a complete day.

The model estimates daily VMT for residential, office, and retail land use types. For residential and office uses, the transportation authority uses tour-based analysis. A tour-based analysis examines the entire chain of trips over the course of a day, not just trips to and from a site. For retail uses, the transportation authority uses trip-based analysis. A trip-based analysis counts VMT from individual trips to and from a site (as opposed to entire chain of trips). A trip-based approach, as opposed to a tour-based approach, is necessary for retail sites because a tour is likely to consist of trips stopping in multiple locations, and the summarizing of tour VMT to each location would over-estimate VMT.

The SF Guidelines set forth screening criteria for types of projects that would typically not result in significant vehicle miles traveled impacts. The project site is an area where existing vehicle miles traveled per capita is more than 15 percent below the existing regional per capita and per employee average, as shown in **Table 8, Existing Vehicle Miles Traveled Per Capita**. The project meets this locational screening criterion and therefore the project would have a less-than-significant vehicle miles traveled impact. [40]

### Table 8: Existing Vehicle Miles Traveled per Capita

| Land Use | Bay Area Regional Average | Bay Area Regional Average Minus 15% (Threshold) | TAZ 319 |
|---|---|---|---|
| Households (Residential) | 17.2 | 14.6 | 2.6 |
| Employment (Office or Health service) | 19.1 | 16.2 | 7.2 |
| Visitors (Retail) | 14.9 | 12.6 | 7.4 |

Source: SF Planning Department; LCW Consulting, 2021

Table 8 presents the existing average daily VMT per capita for residents and employees for the nine-county San Francisco Bay Area and for TAZ 319, the zone in which the project site is located. TAZ 319 is bounded by

[40] San Francisco Planning Department, *Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis*, September 16, 2020.

Sutter Street to the north, Leavenworth Street to the east, Post Street to the south and Van Ness Avenue to the west.

The project also meets the SF Guidelines proximity to transit stations screening criterion. The project site is within one-half mile of an existing major transit stop or an existing stop along a high-quality transit corridor and the project meets other characteristic requirements. This screening criterion also indicates that the proposed project's uses would not cause substantial additional VMT.

The proposed project would also include public right-of-way changes such as reconfigured on-street vehicular parking, closures and/or relocation of driveways, and new and/or expanded on-street commercial and passenger loading zones adjacent to the project site. These improvements are considered minor transportation projects that would not substantially induce automobile travel.

In addition, the project would be subject to planning code section 169, Transportation Demand Management program and would implement a number of measures designed to reduce VMT from the project's residents, employees, and visitors.[41]

For the reasons described above, the proposed project impacts related to VMT and induced automobile travel would be less than significant and no mitigation would be required.

**Impact TR-6: Operation of the proposed project would not result in a loading deficit. (Less than Significant)**

The proposed project would include both off-street and on-street commercial vehicle loading facilities and passenger loading facilities, as described below. In addition, as further described in Section A, Proposed Project, the proposed project would include a loading operations plan with provisions to manage loading activities, including: off-street and on-street commercial and passenger loading activities, provisions for management of large truck access and trash/recycling/compost collection operations, and provisions for accommodating residential move-in and move-out operations. The intent of the loading operations plan is to reduce potential conflicts between passenger and freight loading activities and people walking and bicycling, transit operations, and other vehicles, and to maximize reliance on on-site facilities to accommodate freight and passenger loading demand.

***Commercial Loading.*** The proposed project includes four on-site commercial loading spaces within the first below-grade garage level to serve the project uses. Each space would be 10 feet wide, 25 feet in length, and would have a vertical clearance of 10 feet.[42] In addition, the project would provide a maximum vertical clearance on the garage ramp of 10 feet. The proposed size of the loading spaces and the maximum vertical clearance on the garage ramp would restrict the size of trucks and service vehicles using the on-site loading spaces to vehicles less than 10 feet in height and 25 feet in length. Vans and small U Haul-type moving trucks

[41] San Francisco Planning Department, *Transportation Demand Management (TDM) Program, Supplemental Application for a TDM Plan, Project Application* Case Number 2015-012577PRJ.

[42] The commercial loading spaces would not meet the planning code minimum dimension for loading spaces and the sponsor is seeking a PUD modification to this requirement. The first of the four spaces is required to be a minimum of 10 feet wide, a minimum length of 25 feet, and a minimum vertical clearance, including entry and exit, of 12 feet, and the remaining spaces a minimum of 12 feet wide, 35 feet in length, and a vertical clearance of 14 feet.

are typically 8.5 feet in height and 23 to 25 feet in length and would be able to access the on-site loading spaces.

The project would remove two existing commercial metered loading spaces adjacent to the project site on Hemlock Street; however, the project would also provide an 80-foot-long commercial loading zone on Hemlock Street (for up to four vehicles) to the east of the proposed project garage exit driveway. In addition, the project would provide an 83-foot-long zone on Post Street (for up to four vehicles) for a total of eight on-street commercial loading spaces adjacent to the project site on Post and Hemlock streets (a net increase of six on-street commercial loading spaces). These loading spaces would be adjacent to the retail and restaurant uses on Post Street and the exit driveway and building access on Hemlock Street, and within convenient distance (i.e., within 250 feet) of the commercial retail uses on Van Ness Avenue. Residential move-in and move-out operations that would not fit within the on-site loading spaces would occur on Hemlock Street at the commercial loading spaces. The SFMTA has indicated that the four commercial loading spaces on Hemlock Street east of the garage exit would be limited to trucks with at least six wheels.

The proposed project's peak hour commercial vehicle loading demand of three loading spaces (one for the retail/restaurant uses, and two for the residential and health service uses) would be adequately accommodated by the four on-site and eight on-street commercial loading spaces. Therefore, the proposed project is not expected to create a loading deficit, and project impacts related to commercial loading would be less than significant and no mitigation would be required.

***Passenger Loading.*** Adjacent to the project site, the proposed project would include a new 52-foot-long passenger loading zone (two vehicles) on Van Ness Avenue, and two new passenger loading zones totaling about 160 feet in length (one 73 feet and one 86 feet) on Post Street (seven vehicles) for a total of nine on-street passenger loading spaces adjacent to the project site. In addition, the internal on-site passenger loading area for the health service use would accommodate one vehicle at a time.

During the weekday p.m. peak hour, the proposed project would generate a demand for two passenger loading spaces at the project site during the peak 15 minutes of demand (one for the health service uses, and one for the retail/restaurant and residential uses). This passenger loading demand would be adequately accommodated by the proposed passenger loading zones on Post Street and on Van Ness Avenue, as well as the internal loading area for the health service use.
Therefore, the proposed project is not expected to create a passenger loading deficit and the impact of the proposed project related to passenger loading would be less than significant and no mitigation would be required.

**CUMULATIVE IMPACT ASSESSMENT**

The cumulative transportation impact assessment includes relevant nearby cumulative development projects, in addition to those included in the near-term existing scenario. Cumulative projects within 0.25 miles of the project site that are included in the cumulative analysis include: 1433 Bush Street, 1567 California Street, 1142 Van Ness Avenue, 888 Post Street, 1033 Polk Street, 1333 Gough Street/1481 Post Street, 1525 Pine Street, 955 Post Street, 921 O'Farrell Street, and 1101-1123 Sutter Street. These projects are described in Table 2, p. 26, and shown in Figure 18, p. 27.

**Impact C-TR-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative construction-related transportation impacts (Less than Significant)**

Construction of the project could overlap with construction of the 10 cumulative development projects listed above that have been entitled or are currently under review; however, the timing of construction of most of these development projects is not known, and except for the two projects discussed below, most cumulative development projects are not located in the immediate vicinity of the project site.

In the immediate vicinity of the project site, construction activities associated with the approved conversion of 1142 Van Ness Avenue (across from the project site on Post Street) from an inactive private community facility to Academy of Art University educational use and the new 19-unit residential building at 1033 Polk Street (at Cedar Street, between Geary and Post streets) could have overlapping schedules and use the same roadways to access the project site (e.g., Van Ness Avenue, Post Street). The 1142 Van Ness Avenue conversion of use would not result in substantial construction activities that would be of extended duration, based on the limited amount of construction currently planned for the exterior and interior spaces.[43] The 1033 Polk Street building would include renovation of the existing building on the site and new construction above the existing building. Construction activities of these cumulative projects in the immediate project vicinity would be limited to about 14-16 months and would therefore not be of extended duration.[44]

Given the limited number of nearby projects that could be undergoing construction concurrently with the proposed project, and given compliance with SFMTA blue book regulations concerning construction activities within the public right of way, construction activities associated with cumulative projects combined with that of the proposed project would not result in cumulative construction-related transportation impacts. Thus, no significant cumulative construction-related transportation impacts would occur, and this impact would be less than significant. No mitigation would be required.

**Impact C-TR-2: The proposed project, in combination with cumulative projects, would not create potentially hazardous conditions for people walking, bicycling, driving or public transit operations. (Less than Significant)**

The future land use developments anticipated under cumulative conditions are not anticipated to result in substantial changes to traffic circulation that could lead to potentially hazardous conditions for people walking, bicycling, driving, or riding transit. Under cumulative conditions, trips by people walking, bicycling or driving on the surrounding street network would increase due to the proposed project, other development projects identified above, and growth elsewhere in the city and region. This would generally be expected to lead to an increase in the potential for conflicts between people driving and people walking, bicycling, and public transit operations. However, a general increase in cumulative travel by all modes, in and of itself would not be considered a potentially hazardous condition.

Cumulative projects, including the proposed project, will require designs consistent with city policies and design standards, including the Better Streets Plan, and therefore would not create potentially hazardous conditions. Further, the Van Ness Improvement Project and the recent Polk Street Improvement Project are expected to reduce conflicts along those streets, which are designated in the Vision Zero High Injury

[43] San Francisco Planning Department, Academy of Art University Project EIR Addendum, October 9, 2019. Case No. 2008.0586E
[44] San Francisco Planning Department, 1033 Polk Street, August 29, 2014. Case No, 2014.0914E.

Network. Thus, no significant cumulative impacts related to potentially hazardous conditions would occur and this impact would be less than significant. No mitigation would be required.

**Impact C-TR-3: The proposed project, in combination with cumulative projects, would not significantly interfere with accessibility. (Less than Significant)**

Cumulative projects and citywide growth would contribute to increasing the number of people walking, bicycling, driving, or riding transit on streets surrounding the project site under cumulative conditions. Cumulative development and transportation projects, such as the Van Ness Improvement Project, would enhance the transportation network and would promote accessibility for people walking and bicycling within and through the study area by conforming to the requirements of the Better Streets Plan, Transit First Policy, and Vision Zero, and by adhering to planning principles that emphasize providing convenient connections and safe routes for people walking and bicycling.

None of the known cumulative projects would include features that would affect vehicular circulation in the project vicinity and would not impede emergency access. Emergency vehicles would be able to access the transit-only lanes on Van Ness Avenue and Geary Street/Geary Boulevard. As a result, cumulative projects would not create impediments to accessibility or circulation for people walking or bicycling or create conditions inadequate for emergency access.

As a result, no significant cumulative impacts related to accessibility would occur and this impact would be less than significant. No mitigation would be required.

**Impact C-TR-4: The proposed project, in combination with cumulative projects, would not substantially delay public transit. (Less than Significant)**

During the p.m. peak hour the project would add 243 net-new vehicle trips and 167 transit trips. Of the 10 cumulative development projects listed above, eight are residential buildings with ground floor retail. The other two projects are reuses of existing buildings (888 Post Street with 30,000 gsf and 1142 Van Ness Avenue with 50,000 gsf). None of the known cumulative projects would substantially affect vehicular circulation or increase p.m. peak hour vehicle or transit trips in the project vicinity as to result in substantial transit delay.

Further, two transportation network projects currently under construction would improve cumulative transit conditions in the project vicinity: the Van Ness Improvement Project/Van Ness BRT and the Geary Boulevard Improvement Project, both of which are described above in Section D, Summary of Environmental Effects, under “Near Term Baseline Analysis,” p. 34.

As a result, no significant cumulative transit impacts would occur and this impact would be less than significant. No mitigation would be required.

**Impact C-TR-5: The proposed project, in combination with cumulative projects, would not cause substantial additional VMT or substantially induce automobile travel. (Less than Significant)**

VMT by its nature is largely a cumulative impact. As described above, the project would meet the project-level screening criteria and therefore would not result in significant VMT impacts. Furthermore, under

cumulative conditions, the project site is an area where projected year 2040 VMT per capita and per employee is more than 15 percent below the future regional per capita and per employee average:

- For the residential uses, the projected 2040 average daily VMT per capita is 2.4, which is 85 percent below the 2040 projected regional average daily VMT per capita of 16.1.
- For the office uses (which most closely represents health service uses), the projected 2040 average daily VMT per employee is 6.6, which is 61 percent below the 2040 projected regional average daily VMT per employee of 17.1.
- For the retail uses, the projected 2040 average daily VMT per retail employee is 7.4, which is 49 percent below the 2040 projected regional average daily VMT per retail employee of 14.6.

Thus, no significant cumulative VMT impacts would occur and this impact would be less than significant. No mitigation would be required.

**Impact C-TR-6: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts to loading. (Less than Significant)**

Under cumulative conditions, loading activities for the cumulative development projects would occur in the vicinity of their respective sites and would not combine with the proposed project's loading demand. As discussed in Impact TR-6, the proposed project would provide on-site and on-street commercial and passenger loading facilities adjacent to the project site, including four commercial loading spaces and two passenger loading zones (accommodating about seven vehicles) on Post Street and four commercial loading spaces on Hemlock Street (a net increase of two commercial loading spaces on Hemlock Street after considering removal of two existing commercial loading spaces). The proposed project's estimated peak loading demand would be adequately accommodated by the proposed on-site and on-street commercial and passenger loading spaces. The 1142 Van Ness Avenue project located across the street from the project site on Post Street is a building reuse project, and on-site and on-street loading activities would occur similar to those for the previous use as a private community facility. In addition, the proposed project's on-street loading spaces would be available to accommodate any temporary excess loading demand associated with nearby existing and proposed uses, such as the 1142 Van Ness Avenue project.

No other cumulative development projects have been identified that would contribute to either commercial vehicle or passenger loading demand on the project block and result in loading deficits. Thus, no significant cumulative loading impacts would occur and this impact would be less than significant. No mitigation would be required.

## 6. Noise

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project: | | | | | |
| a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | ☐ | ☒ | ☐ | ☐ | ☐ |
| b) Generate excessive groundborne vibration or groundborne noise levels? | ☐ | ☒ | ☐ | ☐ | ☐ |
| c) For a project located within the vicinity of a private airstrip or an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels? | ☐ | ☐ | ☐ | ☐ | ☒ |

The following analysis relies on the technical noise and vibration evaluation[45] prepared for the proposed project. The technical noise and vibration evaluation provides a detailed overview of noise and vibration considerations and defines acoustical terms. A summary of acoustical terms that are applicable to the noise analysis are provided in **Table 9, Definition of Acoustical Terms**, p. 74. In accordance with the requirements of CEQA, the noise analysis evaluates the project's noise sources to determine the impact of the proposed project on the existing ambient noise environment. Results from the site measurements were used to provide baseline noise conditions at nearby sensitive receptors and within the project site vicinity. For the purpose of this analysis, potential noise-sensitive receptors were determined by reviewing current aerial mapping. The proposed project would not include sources of vibration during operations. Therefore, no operational vibration assessment is required. The project site is not within the vicinity of a private airstrip or within 2 miles of a public airport or public use airport, therefore, Topic 6(c) is not applicable.

### ENVIRONMENTAL SETTING

The ambient noise environment in the City and County of San Francisco is affected by a variety of noise sources, including auto traffic on arterial streets. The following section describes the existing noise environment and identifies the primary noise sources in the vicinity of the project site.

***Noise-Sensitive Receptors.*** Certain land uses are considered more sensitive to noise than others. Examples of these include residential areas, educational facilities, religious institutions, hospitals, childcare facilities, senior housing, hotels, and motels. Existing uses within the immediate vicinity of the project site include commercial, office, medical office, religious institutions, and residential land uses; therefore, the project site and surrounding area contains land uses that are sensitive to noise.

[45] LSA, 1200 Van Ness Project (Case File No. 2015-012577ENV) - Technical Noise and Vibration Evaluation, May 2021.

## Table 9: Definitions of Acoustical Terms

| Term | Definitions |
|---|---|
| Decibel, dB | A unit of level that denotes the ratio between two quantities proportional to power, the number of decibels is 10 times the logarithm (to the base 10) of this ratio. |
| Frequency, Hz | Of a function periodic in time, the number of times that the quantity repeats itself in one second (i.e., number of cycles per second). |
| A-Weighted Sound Level, dBA | The sound level obtained by use of A-weighting. The A-weighting filter deemphasizes the very low and very high frequency components of the sound in a manner similar to the frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise. All sound levels in this assessment are A-weighted, unless reported otherwise. |
| $L_{01}$, $L_{10}$, $L_{50}$, $L_{90}$ | The fast A-weighted noise levels equaled or exceeded by a fluctuating sound level for 1 percent, 10 percent, 50 percent, and 90 percent of a stated time period. |
| Equivalent Continuous Noise Level, $L_{eq}$ | The level of a steady sound that, in a stated time period and at a stated location, has the same A-weighted sound energy as the time varying sound. |
| Community Noise Equivalent Level, CNEL | The 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 5 dB to sound levels occurring in the evening from 7 p.m. to 10 p.m. and after the addition of 10 dB to sound levels occurring in the night between 10 p.m. and 7 a.m. |
| Day/Night Noise Level, $L_{dn}$ | The 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 10 dB to sound levels occurring in the night between 10 p.m. and 7 a.m. |
| $L_{max}$, $L_{min}$ | The maximum and minimum A-weighted sound levels measured on a sound level meter, during a designated time interval, using fast time averaging |
| Ambient Noise Level | The all-encompassing noise associated with a given environment at a specified time, usually a composite of sound from many sources at many directions, near and far; no particular sound is dominant. |
| Intrusive | The noise that intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends upon its amplitude, duration, frequency, and time of occurrence and tonal or informational content, as well as the prevailing ambient noise level. |

Source: Harris, Cyril M. *Handbook of Acoustical Measurements and Noise Control* (1991).

Specifically, noise-sensitive land uses within the immediate vicinity of the project site include a three-story building containing residential and retail uses (1101-1127 Polk Street), an 11-story mixed-use residential building (1285 Sutter Street), one- to three-story residential buildings (1115-1151 Post Street), and a mixed-use building containing retail, healthcare, and residential uses (1 Daniel Burnham Court). **Figure 20: Noise- and Vibration-Sensitive Land Uses Within 1,000 Feet of the Project Site**, p. 75, identifies noise-sensitive land uses within 1,000 feet of the project site. In addition to the noise-sensitive land uses shown in Figure 20, there are several religious institutions located nearby.


**FIGURE 20**

*1200 Van Ness Avenue Project*

Noise- and Vibration-Sensitive Land Uses Within 1,000 Feet of the Project Site

SOURCES: GOOGLE EARTH, 3/26/18; LSA, 2020.

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***Ambient Noise Levels.*** To assess existing noise levels, noise monitoring was conducted as part of the *technical noise and vibration evaluation* to establish the existing ambient noise environment around the project site.[46] Three short-term (15-minute) and five long-term (24-hour) noise measurements were conducted near the project site from October 1, 2020, to October 2, 2020.[47] Short-term measurement 1 (ST-1), ST-2, long-term measurement 2 (LT-2), and LT-3 are located near existing residential receptors and ST-3 and LT-5 are located at existing medical uses. LT-1 and LT-4 are located at the project site boundary to indicate ambient noise levels on the project site. Noise measurement data collected during the noise monitoring are summarized in **Table 10, Ambient Noise Monitoring Results**, p. 78. As shown in Table 10, the short-term noise measurements indicate that ambient noise in the project site vicinity ranges from approximately 61.0 dBA to 68.0 dBA $L_{eq}$ and 57.6 dBA to 63.7 dBA $L_{90}$. The long-term measurements resulted in daily noise levels of 57.5 dBA to 68.7 dBA CNEL and 55.0 dBA to 61.0 dBA $L_{90}$.[48] Vehicle traffic on surrounding roadways, including Van Ness Avenue, Post Street, and Polk Street, and construction on Van Ness Avenue[49] were reported as the primary noise sources. Noise measurement sheets are provided in the *technical noise and vibration evaluation* and noise measurement locations are shown in **Figure 21: Noise Monitoring Locations**, p. 79.

**Impact NO-1: Construction activities associated with the proposed project could result in a significant temporary increase in ambient noise levels in the project vicinity in excess of established standards. (Less than Significant with Mitigation)**

Construction noise is regulated by the City of San Francisco Municipal Code (article 29, sections 2907 and 2908 of the police code). Section 2907 of the police code requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA at a distance of 100 feet from the source. Impact tools are not be subject to the equipment noise limit provided that impact tools and equipment shall have intake and exhaust mufflers recommended by the manufacturers and are approved by the Director of Public Works or the Director of Building Inspection as best accomplishing maximum noise attenuation. Pavement breakers and jackhammers shall also be equipped with acoustically attenuating shields or shrouds recommended by the manufacturers and approved by the Director of Public Works or the Director of Building Inspection as best accomplishing maximum noise attenuation.

Section 2908 of the police code prohibits construction work between 8 p.m. and 7 a.m., if noise would exceed the ambient noise level by 5 dBA at the project property line, unless a special permit is authorized by the Director of Public Works or the Director of Building Inspection. The proposed project is required to comply with section 2907 and 2908 of the city's noise ordinance.

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46 LSA, 1200 Van Ness Project (Case File No. 2015-012577ENV) - Technical Noise and Vibration Evaluation, May 2021.

47 Noise monitoring occurred during the COVID-19 pandemic, which may result in lower than pre-pandemic ambient noise levels from reduced traffic or construction noise but reflects the best information available under current conditions. A lower ambient noise level would result in a conservative (worst-case) evaluation of the proposed project's potential noise impact as there would be a greater potential for increasing ambient noise levels.

48 These measurements do not include results from the LT-2 location. LT-2 was tampered with during the measurement time period; therefore LT-2 only represents a two-hour period.

49 Construction activities occurring on Van Ness Avenue are associated with the Van Ness Bus Rapid Transit (BRT) Project. Existing ambient noise levels reflect Van Ness BRT Project construction activity; however, construction activity is common in the urban environment. Therefore, the Van Ness BRT Project's effect on noise measurements does not unreasonably overstate baseline noise levels.

## Table 10: Ambient Noise Monitoring Results, dBA

| Location Number | Location Description | Start Time | $L_{eq}$/ CNEL [1] | $L_{max}$ [2] | $L_{min}$ [3] | $L_{90}/L_{90}$ Adjusted [4] | Primary Noise Sources |
|---|---|---|---|---|---|---|---|
| ST-1 | South of 1285 Sutter, immediately north of the project site | 11:55 a.m. | 61.0/ 66.6 | 78.5 | 54.3 | 57.4/ 57.6 | General ambient, construction on Van Ness, traffic on Van Ness |
| ST-2 | Immediately south of the project site, in front of the Mandorin | 12:32 p.m. | 64.3/ 69.6 | 86.0 | 54.8 | 58.1/ 60.0 | Traffic on Post and Van Ness, construction on Van Ness |
| ST-3 | In front of Cal-Pac Medical Center, southwest of the project site | 12:15 p.m. | 68.0/ 71.4 | 88.2 | 58.0 | 62.0/ 63.7 | Traffic on Van Ness, construction on Van Ness |
| LT-1 | Northside of existing building rooftop, just east of 1285 Sutter | 10 a.m. | 65.5 | 63.4 | 55.5 | 56.5 | Construction to building at Hemlock and Post, traffic on Van Ness, construction on Van Ness |
| LT-2 | Southeast corner of Hemlock and Polk | 10 a.m. | 60.8 | 72.8 | 69.9 | 61.5 | Traffic on Polk, busses, passing people |
| LT-3 | Southeast corner of existing building rooftop, across from 1116 Post Street | 10 a.m. | 64.6 | 64.6 | 55.3 | 55.0 | Traffic on Polk and Post |
| LT-4 | Southeast corner of existing building rooftop, across from 1142 Van Ness | 10 a.m. | 57.5 | 65.4 | 58.1 | 60.0 | Distant HVAC noise, traffic and construction on Van Ness |
| LT-5 | Pool deck at the Burnham Court Residences, west of project site | 11 a.m. | 68.7 | 67.2 | 56.8 | 61.0 | Traffic on Van Ness, construction on Van Ness |

Source: LSA (October 2020).

[1] $L_{eq}$ represents the average of the sound energy occurring over the measurement time period for the short-term noise measurements. CNEL is the time varying noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly $L_{eq}$ for noises occurring from 7 p.m. to 10 p.m. (defined as relaxation hours) and 10 dBA weighting factor applied to noise occurring from 10 p.m. to 7 a.m. (defined as sleeping hours).

[2] $L_{max}$ is the highest sound level measured during the measurement time period.

[3] $L_{min}$ is the lowest sound level measured during the measurement time period.

[4] $L_{90}$ is the fast A-weighted noise level equaled or exceeded by a fluctuating sound level for 90-percent of a stated time period. Adjusted L90 is the measured $L_{90}$ adjusted based on results from the nearest long-term measurement.

[5] LT-2 was tampered with during the measurement time period; therefore LT-2 represents a two-hour period.


SOURCES: GOOGLE EARTH, 3/26/18; LSA, 2020.

**FIGURE 21**

*1200 Van Ness Avenue Project*
Noise Monitoring Locations

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In addition to the construction noise regulations promulgated in the city's noise ordinance (sections 2907 and 2908), a criterion of 10 dB above the ambient noise level is also used by the planning department to assess substantial temporary ambient noise level increases from construction. A 10 dB increase in ambient noise levels corresponds to a perceived doubling of loudness. This criterion applies at the property lines of the nearest sensitive receivers.

In addition, the planning department supplements the construction noise analysis with guidance provided in the Construction Noise Assessment of the Federal Transportation Administration (FTA) Transit Noise and Vibration Assessment Manual.[50] Specifically, the planning department uses the general assessment daytime residential noise limit of 90 dBA at residential receptors as developed by FTA. This assessment results in a reasonable worst-case scenario because it is based on the assumption that the two noisiest pieces of equipment will operate simultaneously.

Lastly, the planning department also evaluates whether nighttime construction activities have the potential to result in substantial sleep disturbance, with sleep disturbance defined as nighttime construction activities that result in interior residential noise levels of 45 dBA (assuming windows closed).

If any of the above three quantitative criteria are exceeded (10 dB increase in ambient noise levels, 90 dBA at noise-sensitive receptors, or sleep disturbance), the planning department evaluates the temporal frequency, duration, and intensity of the exceedance when determining whether construction noise could result in a substantial temporary increase in ambient noise levels.

***Daytime Construction Noise Evaluation.*** Project construction would result in short-term noise impacts on the nearby sensitive receptors. Maximum construction noise would be short-term, generally intermittent depending on the construction phase, and variable depending on receiver distance from the active construction zone. The level and types of noise impacts that would occur during construction are described below.

Consistent with the FTA's Construction Noise Assessment, this analysis determines the $L_{eq}$ for the two noisiest pieces of equipment expected to be used in each phase of construction. Then, this analysis sums the levels for each phase of construction using decibel addition.

**Table 11, Construction Equipment Noise Emission Levels,** p. 82, lists the noise levels associated with the project construction equipment based on a distance of 50 feet between the equipment and a noise receptor, obtained from the FTA Transit Noise and Vibration Assessment Manual.

For purposes of this analysis, the closest sensitive receptor includes the 11-story mixed-use residential building (1285 Sutter Street), which is located approximately 30 feet from the project site border and approximately 100 feet from the center of the project site.[51] The one- to three-story residential buildings (1115-1151 Post Street), are located approximately 135 feet from the center of the project site, the three-story building containing residential and retail uses (1101-1127 Polk Street) is located approximately

[50] Federal Transit Administration, 2018. *Transit Noise and Vibration Assessment Manual*. (September).

[51] Although 1101-1127 Polk Street is immediately adjacent to the project site, 1285 Sutter Street is located closer to the center of the project site, and is therefore considered the nearest noise-sensitive receptor to the site. A mosque is also located at 1227 Sutter Street, approximately the same distance from the project site as 1285 Sutter Street. Therefore, noise levels reported for the closest sensitive receptor at 1285 Sutter Street represent noise levels expected at the mosque.

**Table 11: Construction Equipment Noise Levels, $L_{max}$**

| Equipment | Typical Noise Level 50 feet from Source, dBA |
|---|---|
| Air Compressor | 80 |
| Backhoe | 80 |
| Concrete Mixer | 85 |
| Concrete Pump | 82 |
| Crane, Derrick | 88 |
| Generator | 85 |
| Grader | 85 |
| Loader | 80 |
| Paver | 85 |
| Pump | 77 |
| Rail Saw | 90 |
| Saw | 76 |
| Truck | 84 |

Source: Transit Noise and Vibration Impact Assessment Manual (Federal Transit Administration, September 2018).

160 feet from the center of the project site, and the mixed-use building containing retail, healthcare, and residential uses (1 Daniel Burnham Court) is located approximately 280 feet from the center of the project site.

Construction of the proposed project would include the following phases: (1) demolition; (2) excavation and shoring; (3) foundation and below-grade construction; (4) base building installation; (5) exterior finishing; and (6) interior finishing. Construction of the proposed project is anticipated to occur over the course of approximately 25 months. The anticipated construction equipment list was provided by the project sponsor.

**Table 12, Project Construction Noise Levels**, p. 83, identifies the noise levels per phase of construction based on the two noisiest pieces of equipment expected to be used in each phase of construction at the nearest sensitive receptor located from the center of the project site, consistent with the methodology outlined in the FTA Transit Noise and Vibration Assessment Manual. As identified above, the nearest receptor is the residential building at 1285 Sutter Street, located 30 feet from the project property line.

As indicated in Table 12 above, the noisiest construction phase would be demolition, which would result in noise levels of 79 dBA $L_{eq}$ at the closest noise-sensitive receptor. Demolition is expected to last approximately 1.5 months. Noise levels during excavation and shoring and foundation and below grade-construction would be slightly lower at 77 dBA $L_{eq}$ at the closest noise-sensitive receptor. These two construction phases are expected to last approximately 9 months. Base building installation would also have slightly lower noise levels of 75 dBA $L_{eq}$ at the closest noise-sensitive receptor and would occur for approximately 16 months. Exterior finishing and interior finishing would have a noise level of 76 dBA $L_{eq}$ and 74 dBA $L_{eq}$ at the closest noise-sensitive receptor, respectively, and would each occur for approximately 3 months.

## Table 12: Project Construction Noise Levels

| Construction Phase | Equipment | Reference Noise Level ($L_{max}$) at 50 feet | $L_{eq}$ at 50 feet | $L_{eq}$ at Nearest Receptor[1] | Construction Noise Greater than 10 dBA Above Ambient? | FTA Daytime Noise Criteria of 90 dBA Exceeded? |
|---|---|---|---|---|---|---|
| Demolition | Concrete Saw | 90 | 85 | 79 | Yes | No |
| | Excavator | 85 | | | | |
| Excavation and Shoring | Excavator | 85 | 83 | 77 | Yes | No |
| | Shoring Pile Rig | 85 | | | | |
| Foundation and Below-Grade Construction | Tractor/Loader/ Backhoe (2) | 85 | 83 | 77 | Yes | No |
| Base Building Installation | Concrete Pump | 82 | 81 | 75 | Yes | No |
| | Crane | 88 | | | | |
| Exterior Finishing | Crane | 88 | 82 | 76 | Yes | No |
| | Forklift | 85 | | | | |
| Interior Finishing | Air Compressor | 80 | 80 | 74 | Yes | No |
| | Aerial Lift | 85 | | | | |

Source: LSA (November 2020).
Note: For construction equipment noise levels not included in the Transit Noise and Vibration Assessment Manual (FTA 2018), noise levels were obtained from the Roadway Construction Noise Model (FHWA 2006).
[1] The nearest receptor is located approximately 30 feet from the property line and approximately 100 feet from the center of the project site.

As shown in Table 10, p. 78, existing ambient noise levels at the project site range from 55.0 dBA to 63.7 dBA $L_{90}$. Short-term noise measurement (ST-1) determined that noise levels at the mixed-use residential building (1285 Sutter Street) are approximately 57.6 dBA $L_{90}$. Therefore, noise-sensitive receptors would be potentially exposed to noise levels between 16 and 21 dBA above the ambient noise level (57.6 dBA $L_{90}$) for the entire 25-month duration of construction. It is noted that noise levels would fluctuate throughout the day depending upon the specific equipment being used at any one time. Overall, construction noise levels would be approximately 74 dBA to 79 dBA $L_{eq}$ at the nearest sensitive receptor (1285 Sutter Street) and would not exceed the FTA's construction noise criteria of 90 dBA at noise-sensitive receptors. However, given that noise during project construction has the potential to exceed ambient noise levels by up to 21 dBA during all construction phases and throughout the entire 25-month construction duration, daytime construction noise impacts are considered significant. Mitigation Measure M-NO-1: Construction Noise Control, below, has been identified and agreed to by the project sponsor.

***Nighttime Construction Noise Evaluation.*** Most construction would occur during daytime hours, but some nighttime construction may occur during the total 25-month construction phase. Nighttime construction work may include the following activities:

- 10 consecutive days of overnight work for exterior skin erection and utility trench work;
- 15 nonconsecutive early mornings (before 7 a.m.) for delivery of oversize equipment; and
- Two mat pours, likely 5 to 7 days apart, which would be approximately 20 hours in duration.

As identified in Table 12, p. 83, project construction noise levels during the foundation and below-grade construction, base building installation, and exterior finishing phases would result in noise levels up to 77 dBA $L_{eq}$ at the nearest noise-sensitive receptors. These construction phases would include the exterior skin erection, utility trench work, delivery of oversize equipment, and mat pour construction activities that may occur during nighttime hours. Accounting for an outdoor-to-indoor (with windows closed) attenuation of 25 dB from standard building materials nighttime construction noise associated with the proposed project would result in interior noise levels of approximately 52 dBA $L_{eq}$ (77 – 25 = 52 dBA). This nighttime construction has the potential to exceed the generally accepted interior noise level of 45 dBA. Given that nighttime construction noise could result in sleep disturbance for a prolonged period of time, specifically for 10 consecutive nights and 17 nonconsecutive nights or early mornings, nighttime construction noise impacts are considered significant. **Mitigation Measure M-NO-1: Construction Noise Control**, below, has been identified and agreed to by the project sponsor.

**MITIGATION MEASURE**

**Mitigation Measure M-NO-1** **Construction Noise Control**. Prior to issuance of any demolition or building permit, the project sponsor shall submit a project-specific construction noise control plan to the Environmental Review Officer (ERO) or the ERO's designee for approval. The construction noise control plan shall be prepared by a qualified acoustical engineer, with input from the construction contractor, and include measures to reduce construction noise so as avoid a potential noise impact on nearby sensitive users. The construction noise control plan shall identify noise control measures to meet a performance target of construction activities not resulting in the following: 10 dBA above the ambient noise level at noise-sensitive receptors and nighttime sleep disturbance, defined as interior noise levels at residential uses exceeding 45 dBA during nighttime hours. The project sponsor shall ensure that requirements of the construction noise control plan are included in contract specifications. The plan shall include specific measures to reduce nighttime construction noise. The plan shall also include measures for notifying the public of construction activities, complaint procedures, and a plan for monitoring construction noise levels in the event complaints are received. The construction noise control plan shall include measures to reduce construction noise levels, including, but not limited to the following measures, as feasible:

- Use construction equipment that is in good working order, and inspect mufflers for proper functionality;
- Select "quiet" construction methods and equipment (e.g., improved mufflers, use of intake silencers, engine enclosures);
- Use construction equipment with lower noise emission ratings whenever possible, particularly for air compressors;
- Prohibit the idling of inactive construction equipment for more than five minutes;

- Locate stationary noise sources (such as compressors) as far from nearby noise-sensitive receptors as possible, muffle such noise sources, and construct barriers around such sources and/or the construction site.

- Avoid placing stationary noise-generating equipment (e.g., generators, compressors) within noise-sensitive buffer areas (as determined by the acoustical engineer) immediately adjacent to noise-sensitive receptors.

- Enclose or shield stationary noise sources from neighboring noise-sensitive receptors with noise barriers to the extent feasible. To further reduce noise, locate stationary equipment in pit areas or excavated areas, if feasible; and

- Install temporary barriers, barrier-backed sound curtains and/or acoustical panels around working powered impact equipment and, if necessary, around the project site perimeter. When temporary barrier units are joined together, the mating surfaces shall be flush with each other. Gaps between barrier units, and between the bottom edge of the barrier panels and the ground, shall be closed with material that completely closes the gaps, and dense enough to attenuate noise.

The construction noise control plan shall include the following measures for notifying the public of construction activities, complaint procedures and monitoring of construction noise levels:

- Designation of an on-site construction noise manager for the project;

- A sign posted on-site describing noise complaint procedures and a complaint hotline number that shall always be answered during construction;

- A procedure for notifying the planning department of any noise complaints within one week of receiving a complaint;

- A list of measures for responding to and tracking complaints pertaining to construction noise. Such measures may include the evaluation and implementation of additional noise controls at sensitive receptors (residences, hospitals, convalescent homes, schools, churches, hotels and motels, and sensitive wildlife habitat); and

- Conduct noise monitoring (measurements) at the beginning of major construction phases (e.g., demolition, grading, excavation) to determine the effectiveness of noise attenuation measures and, if necessary, implement additional noise control measures.

***Significance after Mitigation.*** Mitigation Measure M-NO-1 would reduce the daytime and nighttime construction noise levels at nearby noise-sensitive receptors. A reduction in construction noise levels would

be achieved by locating stationary noise-producing equipment as far away from noise-sensitive receptors as possible. In addition, Mitigation Measure M-NO-1 would require the project sponsor and their construction contractors to use noise attenuation barriers and/or blankets and utilize blockades from construction trailers as much as possible, and all equipment would be attenuated with mufflers as much as possible. Construction noise may at times exceed 10 dBA above the ambient or interior noise levels of 45 dBA at residential uses during nighttime hours even with mitigation. However, this mitigation measure would substantially reduce the intensity of construction noise and the temporal frequency and duration of construction noise that exceed 10 dBA above the ambient noise levels, or interior noise levels of 45 dBA at residential uses during nighttime hours. Furthermore, construction noise levels would be temporary and would not persist upon completion of construction activities. Individual pieces of construction equipment (apart from impact equipment) would also be required to comply with the noise limits in article 29 of the police code. Thus, with required adherence to the construction noise limits in article 29 of the police code and implementation of Mitigation Measure M-NO-1, construction noise impacts would be less than significant.

**Impact NO-2: Construction of the proposed project could generate excessive groundborne noise or vibration levels. (Less than Significant with Mitigation)**

Groundborne vibration from construction activities can produce detectable vibration at nearby buildings, infrastructure, and sensitive receptors. The main concerns associated with construction-generated vibration include sleep disturbance, building damage, and interference with vibration-sensitive instruments or machinery, such as that used in research laboratories or hospitals. The potential for construction activities to generate vibration affecting each of these receptor types are discussed below, following the discussion of vibration levels that may be generated during construction.

Potential vibration-related impacts to structures, equipment, utilities, or people from construction are generally limited to the use of impact equipment such as pile drivers (impact and vibratory), hoe rams, and vibratory compactors.

Vibration intensity is expressed as peak particle velocity (PPV), the maximum speed at which the ground moves while it temporarily shakes. Because ground-shaking speeds are very slow, PPV is measured in inches per second. This environmental analysis of construction vibration considers whether construction activities would result in building or utility damage or sleep disturbance to sensitive receptors. The closest building potentially containing vibration-sensitive equipment is the mixed-use building at 1 Daniel Burnham Court, which contains retail, healthcare, and residential uses located approximately 130 feet from the project site. At a distance of 130 feet, construction of the proposed project would not generate vibration that would affect vibration-sensitive equipment should such equipment be present at the 1 Daniel Burnham Court building. Therefore, no further assessment of impacts to vibration-sensitive equipment is provided below. Impacts to vibration-sensitive equipment would be less than significant.

**DAMAGE TO STRUCTURES**

A structure's susceptibility to vibration-induced damage depends upon its age, condition, distance from the vibration source, material, and the vibration level. Vibration impacts to structures are usually significant if construction vibration could potentially result in damage or, in the case of a historic resource, materially impair the resource pursuant to CEQA Guidelines section 15064.5.

The California Department of Transportation (Caltrans) Transportation and Construction Vibration Guidance Manual[52] sets vibration guidelines for potential damage to structures, as shown in **Table 13**, **Vibration Guidelines for Potential Damage to Structures**. The Caltrans guidelines indicate that a vibration level up to 0.25 in/sec in PPV is considered safe for buildings classified as "historic and some old buildings" from continuous/frequent intermittent sources.

### Table 13: Vibration Guidelines for Potential Damage to Structures

| Structure Type and Condition | Maximum Peak Particle Velocity (PPV, in/sec) | |
|---|---|---|
| | Transient Sources | Continuous/Frequent Intermittent Sources |
| Extremely fragile historic buildings | 0.12 | 0.008 |
| Fragile buildings | 0.20 | 0.10 |
| Historic and some old buildings | 0.50 | 0.25 |
| Older residential structures | 0.50 | 0.30 |
| New residential structures | 1.0 | 0.50 |
| Modern/industrial commercial buildings | 2.0 | 0.50 |

Source: California Department of Transportation, 2020. Transportation and Construction Vibration Guidance Manual, Table 19. April.
Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

**Table 14, Construction Equipment Levels at Various Distances,** shows the PPV values at various distances. The greatest levels of vibration are anticipated to occur during use of the shoring drill rig for building foundation work.

### Table 14: Construction Equipment Levels at Various Distances

| Equipment[1] | PPV at Various Distances[2] | | | | | | |
|---|---|---|---|---|---|---|---|
| | 5 feet | 10 feet | 15 feet | 25 feet | 50 feet | 75 feet | 100 feet |
| Caisson Drilling | **0.995** | **0.352** | 0.191 | 0.0890 | 0.031 | 0.017 | 0.011 |
| Loaded Trucks | **0.850** | **0.300** | 0.164 | 0.076 | 0.027 | 0.016 | 0.010 |

Source: Transit Noise and Vibration Impact Assessment Manual, Federal Transit Administration, September 2018

1 Groundborne vibration levels vary based upon the substrate that underlies the site (soil, bedrock, etc.).

2 Calculated using the following formula: PPV equip = PPVref x (25/D)1.5. The value of 1.5 is based upon competent soils: most sands, sandy clays, silty clays, gravel, silts, weathered rock. (can dig with shovel) (Source California Department of Transportation, Transportation and Construction Vibration Guidance Manual, April 2020).

The closest structure to the project site is the three-story building containing residential and retail uses (1101-1127 Polk Street), which is located adjacent to the eastern border of the project site and is categorized as a historic resource. Therefore, this analysis assumes that since the proposed new building would be located immediately adjacent to the 1101-1127 Polk Street building, the shoring drill rig would operate

52 California Department of Transportation (Caltrans), 2020. *Transportation and Construction Vibration Guidance Manual*. April. Website: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf (accessed June 2020). https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf

adjacent to the building. As shown in Table 14 above, shoring drill rigs generate approximately 0.995 PPV of groundborne vibration when measured within 5 feet, based on the Transit Noise and Vibration Impact Assessment Manual. As a result, this vibration at the nearest building from construction equipment would exceed the Caltrans damage criteria of 0.25 in/sec PPV for building damage to historic and older buildings for continuous/frequent intermittent sources, resulting in a significant impact.[53] Therefore, **Mitigation Measure M-NO-2: Protection of Adjacent Building and Vibration Monitoring During Construction**, below, would be required to reduce vibration impacts at the 1101-1127 Polk Street building.

**MITIGATION MEASURE**

**Mitigation Measure M-NO-2** **Protection of Adjacent Building and Vibration Monitoring During Construction**. Prior to issuance of any demolition or building permit, the project sponsor shall submit a project-specific pre-construction survey of the building at 1101-1127 Polk Street (Assessor's Block 0691, Lot 002) and a vibration management and monitoring plan to the Environmental Review Officer (ERO) or the ERO's designee for approval. The plan shall identify all feasible means to avoid damage to the building at 1101-1127 Polk Street. The project sponsor shall ensure that the following requirements of the pre-construction survey and the vibration management and monitoring plan are included in contract specifications, as necessary.

*Pre-construction Survey*. Prior to the start of any ground-disturbing activity, the project sponsor shall engage a qualified historic preservation professional to undertake a pre-construction survey of the 1101-1127 Polk Street building. The pre-construction survey shall include descriptions and photographs of the 1101-1127 Polk Street building including all facades, roofs, and details of the character-defining features that could be damaged during construction, and shall document existing damage, such as cracks and loose or damaged features (as allowed by the property owner). The report shall also include pre-construction drawings that record the pre-construction condition of the building and identify cracks and other features to be monitored during construction. The preconstruction survey shall be submitted to the ERO for review and approval prior to the start of vibration-generating construction activity.

*Vibration Management and Monitoring Plan*. The project sponsor shall undertake a vibration management and monitoring plan to avoid or reduce project-related construction vibration damage to the 1101-1127 Polk Street building and to ensure that any such damage is documented and repaired. Prior to issuance of any demolition or building permit, the project sponsor shall submit the plan to the ERO for review and approval. The plan shall include, at a minimum, the following components:

[53] None of the adjacent buildings would be considered fragile or extremely fragile and therefore these building damage criteria are not applicable to this project.

- *Maximum Vibration Level*. Based on the anticipated construction and condition of the 1101-1127 Polk Street building, a qualified acoustical/vibration consultant in coordination with a qualified historic preservation professional shall establish a maximum vibration level that shall not be exceeded at the 1101-1127 Polk Street building based on existing conditions, character-defining features, soil conditions, and anticipated construction practices. (The common standard for historic buildings is a peak particle velocity of 0.25 inch per second.)

- *Vibration-generating Equipment.* The plan shall identify all vibration-generating equipment to be used during each phase of construction (site preparation, clearing, demolition, excavation, shoring, foundation installation, and building construction).

- *Alternative Construction Equipment and Techniques.* The plan shall identify potential alternative equipment and techniques that could be implemented if construction vibration levels are observed in excess of the established standard.

- *Buffer Distances.* Based on vibration levels and site constraints, the plan shall identify whether buffer distances should be maintained between the operation of vibration-generating construction equipment and the 1101-1127 Polk Street building to avoid damage, to the extent possible.

- *Vibration Monitoring.* The plan shall identify the method and equipment for vibration monitoring to ensure that vibration levels do not exceed the established standards identified in the plan.

    - Should construction vibration levels be observed in excess of the standards established in the plan, the contractor(s) shall halt construction and put alternative construction techniques identified in the plan into practice, to the extent feasible.

    - The historic preservation professional shall inspect the 1101-1127 Polk Street building (as allowed by the property owner) in the event that construction activities exceed vibration levels identified in the plan.

    - The historic preservation professional shall submit monthly reports to the ERO during vibration-inducing activity periods that identify and summarize any vibration level exceedances and describe the actions taken to reduce vibration.

    - If vibration has damaged the 1101-1127 Polk Street building, the historic preservation professional shall immediately notify the ERO and prepare a damage report documenting the features of the building that have been damaged.

- Following incorporation of the alternative construction techniques and/or planning department review of the damage report, vibration monitoring shall recommence to ensure that vibration levels at the 1101-1127 Polk Street building are not exceeded.

- *Periodic Inspections.* The plan shall identify the intervals and parties responsible for periodic inspections. The historic preservation professional shall conduct regular periodic inspections of the 1101-1127 Polk Street building during vibration-generating construction activity on the project site. The plan will specify how often inspections shall occur.

- *Repair Damage.* The plan shall identify provisions to be followed should damage to the 1101-1127 Polk Street building occur due to construction-related vibration. The plan shall state that the building shall be remediated to its pre-construction condition (as allowed by the property owner) at the conclusion of vibration-generating activities on the site.

*Vibration Monitoring Results Report.* After construction is complete, the historic preservation professional shall submit to the ERO a final vibration monitoring report. The report shall include, at a minimum, collected monitoring records, a building condition summary, descriptions of all instances of vibration level exceedance, identification of damage incurred due to vibration, and corrective actions taken to restore any damage caused by construction-related vibration. The ERO shall review and approve the vibration monitoring results report.

***Significance after Mitigation.*** Mitigation Measure M-NO-2 would require submittal and approval of a project-specific pre-construction survey and a vibration management and monitoring plan to identify all feasible means to avoid damage to the potentially affected building at 1101-1127 Polk Street, which is a potential historic resource. With implementation of Mitigation Measure M-NO-2, impacts from construction vibration to adjacent buildings would be reduced to less than significant.

**DAMAGE TO UTILITIES**

Underground utilities are generally considered to be less susceptible to damage than surface structures because vibration under the ground surface is lower than at the ground surface, due to the dampening effects of the substrate. The American Association of State Highway and Transportation Officials notes that at least one utility has established a standard maximum vibration of 4.0 in/sec PPV for buried utilities, noting that underground or restrained concrete structures can withstand vibration of 10.0 in/sec PPV before threshold cracks appear.[54] As such, damage to utilities is not expected as a result of the proposed project and impacts would be less than significant and no mitigation would be required.

[54] California Department of Transportation. *Transportation and Construction Vibration Guidance Manual*. September 2013. Table 20. Available: http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf.

**SLEEP DISTURBANCE**

Ground-borne vibration and noise can also disturb people. People are generally more sensitive to vibration during nighttime hours when sleeping than during daytime waking hours. Nighttime construction work associated with the proposed project may include the following activities: exterior skin erection and utility trench work; delivery of oversize equipment; and mat pours. These activities would not include the use of vibratory equipment; therefore, nighttime construction would not result in vibration-related sleep disturbance as no vibration generating equipment would be used during nighttime construction and impacts would be less than significant and no mitigation would be required.

As documented above, the proposed project's construction activities that require use of vibratory equipment could result in damage to the adjacent building at 1101-1127 Polk Street, which is also a historic resource. This would be a significant impact; however, with implementation of Mitigation Measure M-NO-2, vibration impacts would be reduced to less than significant. In addition, the proposed project would not have the potential to result in interference with vibration-sensitive equipment, utility damage or sleep disturbance. For these reasons, construction vibration impacts would be less than significant with mitigation.

**Impact NO-3: Operation of the proposed project would not result in a substantial permanent increase in ambient noise levels in the project vicinity in excess of applicable standards. (Less than Significant)**

**TRAFFIC NOISE**

Traffic noise levels in the project site vicinity were assessed using the Federal Highway Administration (FHWA) highway traffic noise prediction model (FHWA RD-77-108). This model uses a typical vehicle mix for urban/suburban areas in California and requires parameters, including traffic volumes, vehicle speed, and roadway geometry, to compute typical equivalent noise levels during daytime, evening, and nighttime hours. The resultant noise levels are weighted and summed over 24-hour periods to determine the CNEL values. Traffic volumes for existing without and with the proposed project and traffic noise levels at 50 feet from the centerline of the outermost travel lane for each roadway segment in the project vicinity are shown in **Table 15, Calculated Traffic Noise Levels Without and With Proposed Project**, p. 92. These noise levels represent the worst-case scenario, which assumes that no shielding is provided between traffic and the location where the noise contours are drawn. The *technical noise and vibration evaluation*[55, 56] provides the specific assumptions used in developing these noise levels and model printouts.

[55] LSA, 1200 Van Ness Project (Case File No. 2015-012577ENV) - Technical Noise and Vibration Evaluation, May 2021.

[56] The original application materials submitted by the project sponsor assumed development of approximately 133,214 gsf of residential use, 115,898 gsf of health service use, 21,112 gsf of retail/commercial use, and 4,615 gsf of restaurant use. Since preparation of the noise analysis, the proposed square footages were refined to 130,170 gsf of residential use, 106,700 gsf of health services, 24,520 gsf of retail/commercial uses, and 4,340 gsf of restaurant use, as identified in Table 1, resulting in 90 average daily vehicle trips less than the previous analysis. While the traffic noise analysis is based on the previously proposed square footages, the difference would have a negligible effect on the analysis outcome for traffic noise levels, which remain conservative. Therefore, no change to the analysis was necessary as a result of the minor revisions to the proposed square footages.

## Table 15: Calculated Traffic Noise Levels Without and With Proposed Project

| Roadway Segment | Without Project ADT | CNEL (dBA) 50 feet from Centerline of Outermost Lane | With Project ADT | CNEL (dBA) 50 feet from Centerline of Outermost Lane | Increase from Baseline Conditions |
|---|---|---|---|---|---|
| Van Ness Avenue north of Sutter Street | 17,720 | 61.0 | 18,230 | 61.1 | 0.1 |
| Van Ness Avenue south of Sutter Street | 16,490 | 61.4 | 17,000 | 61.5 | 0.1 |
| Sutter Street east of Van Ness Avenue | 6,330 | 58.2 | 6,470 | 58.3 | 0.1 |
| Sutter Street west of Van Ness Avenue | 5,960 | 57.9 | 6,100 | 58.0 | 0.1 |
| Hemlock Street east of Van Ness Avenue | 110 | 41.8 | 500 | 48.4 | 6.6 |
| Van Ness Avenue north of Post Street | 18,670 | 61.9 | 18,770 | 62.0 | 0.1 |
| Van Ness Avenue south of Post Street | 19,360 | 62.1 | 19,600 | 62.1 | 0.0 |
| Post Street east of Van Ness Avenue | 5,800 | 57.8 | 6,580 | 58.3 | 0.5 |
| Post Street west of Van Ness Avenue | 5,670 | 57.7 | 6,310 | 58.1 | 0.4 |
| Sutter Street east of Polk Street | 7,860 | 59.1 | 8,000 | 59.2 | 0.1 |
| Sutter Street west of Polk Street | 6,990 | 58.6 | 7,130 | 58.7 | 0.1 |
| Polk Street south of Hemlock Street | 5,770 | 58.3 | 6,510 | 58.9 | 0.6 |
| Hemlock Street west of Polk Street | 110 | 41.8 | 850 | 50.7 | 8.9 |
| Polk Street north of Post Street | 5,670 | 58.3 | 6,410 | 58.8 | 0.5 |
| Polk Street south of Post Street | 5,830 | 58.4 | 6,730 | 59.0 | 0.6 |
| Post Street east of Polk Street | 5,960 | 57.9 | 6,150 | 58.0 | 0.1 |
| Post Street west of Polk Street | 5,880 | 57.8 | 6,230 | 58.1 | 0.3 |

Source: Compiled by LSA (November 2020).
Note: Average daily trips were calculated using the intersection turning volumes provided in the Transportation Impact Analysis (LCW Consulting 2021).
ADT = average daily traffic
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibels

As shown in Table 15, the roadway segments that would experience the greatest increase in traffic noise levels with the proposed project would be Hemlock Street west of Polk Street (8.9 dBA increase) and Hemlock Street east of Van Ness Avenue (6.6 dBA increase).[57] This calculated noise level increase would exceed the 3.0 dBA increase considered to be perceptible by the human ear in an outdoor environment; however the resulting calculated noise level along Hemlock Street west of Polk Street would be 50.7 dBA CNEL and the resulting calculated noise level along Hemlock Street east of Van Ness Avenue would be 48.4 dBA CNEL. The measured ambient noise levels include noise from all noise sources in the project vicinity.

These calculated noise levels are lower than the measured ambient noise levels along Hemlock Street (ST-2 and LT-2). As shown in Table 10, p. 78, existing ambient noise levels along Hemlock Street are 69.6 dBA CNEL (ST-2) and 60.8 dBA CNEL (LT-1). Therefore, because the calculated project-related traffic noise increase along Hemlock Street is more than 10 dBA lower than measured ambient noise levels, the project's traffic-

[57] Noise levels along all other roadway segments analyzed would be less than one and therefore not perceptible.

generated noise is not anticipated to increase ambient noise levels. Therefore, permanent noise increases due to project-related traffic would be less than significant and no mitigation would be required.

**NOISE-GENERATING USES**

Section 2909 of the noise ordinance regulates noise from mechanical equipment and other similar sources. This would include all equipment, such as electrical equipment (transformers) as well as mechanical equipment that is installed on commercial/industrial and residential properties. Section 2909 states in subsection (b) that mechanical equipment operating on commercial or industrial property must not produce a noise level more than 8 dBA above the ambient noise level at the property plane. Section 2909 also states in subsection (d) that no fixed (permanent) noise source (as defined by the noise ordinance) may cause the noise level inside any sleeping or living room in a dwelling unit on residential property to exceed 45 dBA between 10 p.m. and 7 a.m. or 55 dBA between 7 a.m. and 10 p.m. when windows are open, except where building ventilation is achieved through mechanical systems that allow windows to remain closed. As recommended by the public health department, emergency generators are also evaluated consistent with section 2909(d) and a criterion of 75 dBA at the property plane.

Stationary noise sources associated with the proposed project include mechanical equipment (i.e., electrical generation facilities and heating, ventilation, and air conditioning [HVAC] systems), two emergency generators, occasional truck delivery loading/unloading activities, and typical motor vehicle/parking area activities. Stationary source noise impacts are discussed below.

***Mechanical Equipment Noise.*** The proposed project would include rooftop mechanical features, including air cooled chillers, make-up air (MUA) units, boilers, rooftop fans, and variable refrigerant volume (VRV) condensing units, which would be enclosed within an up to 10-foot-tall screen centered on the roof. The proposed project would also include emergency generators, exhaust fans, ice storage tanks, PG&E transformer rooms, and HVAC air handling units; however, this equipment would be located within level 1 and levels B1 through B4 of the proposed parking garage. Locating this equipment within the building interior would ensure that this equipment is shielded sufficiently such that noise associated with this equipment would not be audible outside of the building. Therefore, the proposed rooftop mechanical equipment would be the primary source of mechanical equipment noise.

Based on reference noise measurements, rooftop mechanical-related noise was assumed to be 75 dBA $L_{max}$ at a distance of 3 feet from the equipment.[58] This reference noise measurement of 75 dBA $L_{max}$ would be representative of noise produced by the mechanical equipment proposed as part of the project.

As noted above, section 2909 of the Noise Ordinance states in subsection (b) that mechanical equipment operating on commercial or industrial property must not produce a noise level more than 8 dBA above the ambient noise level at the property plane. The rooftop mechanical equipment would be located approximately 45 feet from the project site boundary at Post Street. As noise spreads from a source, it loses energy so that the farther away the noise receiver is from the noise source, the lower the perceived noise level. Noise levels from a single-point source, such as a single piece of equipment operating at ground level, attenuates at a rate of 6.0 dB for each doubling of distance (between the single-point source of noise and the noise-sensitive receptor of concern). Therefore, based on a reduction in noise of 6.0 dBA per doubling of distance, at 45 feet, mechanical noise would be approximately 51 dBA $L_{max}$ at the property plane. In addition,

[58] Trane, Sound Data and Application Guide for the New and Quieter Air-Cooled Series R Chiller, 2002.

as noted above, the mechanical features would be enclosed with a 10-foot-tall screen centered on the roof. LSA calculated the attenuation provided by the wall and determined that the screen would reduce noise levels by a minimum of 5 dBA. Therefore, mechanical noise would be approximately 46 dBA $L_{max}$ at the property plane. As noted in Table 10, p. 78, above, noise levels in the project vicinity range from approximately 55.0 dBA to 63.7 dBA $L_{90}$. Therefore, mechanical noise would not produce a noise level of 8 dBA above the ambient noise level at the property plane.

Section 2909 of the noise ordinance also states in subsection (d) that no fixed (permanent) noise source (as defined by the Noise Ordinance) may cause the noise level inside any sleeping or living room in a dwelling unit on residential property to exceed 45 dBA between 10 p.m. and 7 a.m. or 55 dBA between 7 a.m. and 10 p.m. when windows are open, except where building ventilation is achieved through mechanical systems that allow windows to remain closed. The closest sensitive receptors to mechanical equipment would be at the 11-story mixed-use residential building (1285 Sutter Street),[59] which would be located approximately 90 feet from the rooftop mechanical equipment.

Therefore, based on a reduction in noise of 6.0 dBA per doubling of distance, at 90 feet, sensitive receptors within the mixed-use residential building (1285 Sutter Street) would be exposed to a noise level of 45 dBA $L_{max}$ generated by mechanical equipment. In addition, as noted above, the mechanical features would be enclosed within a 10-foot-tall screen centered on the roof, which would reduce noise levels by approximately 5 dBA. Therefore, the sensitive receptors within the mixed-use residential building (1285 Sutter Street) would be exposed to a noise level of 40 dBA $L_{max}$ generated by mechanical equipment. As noted in Table 10, p. 78, ST-1 determined that noise levels at the mixed-use residential building (1285 Sutter Street) are approximately 60.1 dBA $L_{eq}$, 66.0 dBA CNEL, 78.5 dBA $L_{max}$, 54.3 dBA $L_{min}$, and 57.6 dBA $L_{90}$, with the primary noise sources being reported as vehicle traffic on Van Ness Avenue and construction activity on Van Ness Avenue. Therefore, because noise from the building mechanical systems would be more than 10 dBA lower than existing ambient noise levels, mechanical noise would not produce a noise level above the ambient noise level at the nearest residential property boundary and would not cause the noise level inside any sleeping or living room in a dwelling unit on residential property to exceed 45 dBA between 10 p.m. and 7 a.m. or 55 dBA between 7 a.m. and 10 p.m. when windows are open.

Therefore, mechanical noise associated with the proposed project would not cause a noticeable increase in existing noise levels on nearby sensitive receptors and this impact would be less than significant and no mitigation would be required.

***Emergency Generators.*** The proposed project would include two emergency generators; however, this equipment would be fully enclosed within level 1 of the proposed building and would include exhaust silencers. Locating the emergency generators within the building interior would ensure that the emergency generators are shielded sufficiently such that noise associated with this equipment would not be audible outside of the building. Therefore, because the proposed emergency generators would be shielded from surrounding land uses and would include exhaust silencers, the proposed emergency generators would be consistent with section 2909(d) and would be below the criterion of 75 dBA at the property plane.

[59] Although 1101-1127 Polk Street is adjacent to the project site, 1285 Sutter Street is located closer to the mechanical equipment.

***Truck Delivery and Loading/Unloading Activity and Parking Lot Noise.*** Based on noise monitoring data collected by LSA for various outdoor noise sources, parking activities, such as people conversing or doors slamming, would generate noise levels of approximately 60 dBA to 70 dBA $L_{max}$ at 50 feet, while delivery truck loading and unloading activities would result in maximum noise levels up to 80 dBA $L_{max}$ at 50 feet.[60] Therefore, of the on-site stationary noise sources during operation of the project, noise generated by delivery truck activity would generate the highest maximum noise levels. There are generally two types of loading that would occur on the site: small deliveries like parcels and packages or moving trucks, and large deliveries such as major retail items or supplies for the health service uses. The former are typically made via passenger car, van, or single-unit truck and would not be considered substantial noise sources from the proposed project. Large delivery activities are potential sporadic point sources of noise that could affect noise-sensitive receptors in the project site vicinity.

The proposed project would include a four-level, below-grade parking garage. Loading spaces would be located on the B1 level of the parking garage. Locating the loading spaces within the parking garage would ensure that the loading activities are shielded sufficiently such that loading activity noise would not be audible outside of the building. Off-street loading facilities on the project site are currently provided via a driveway on Post Street and two driveways on Hemlock Street. As the proposed project would provide loading spaces within the parking garage, shielded from adjacent land uses, loading activity noise would not result in a noise level above existing conditions. The *technical noise and vibration evaluation* also determined that the project's proposed on-street commercial and passenger loading activities would not be considered substantial noise sources from the proposed project.

In addition, collection of garbage is limited by noise ordinance section 2904 to a sound level of 75 dBA at 50 feet (this limit does not apply to crushing, impacting, dropping, or moving garbage on the truck, but only to the truck's mechanical processing system). Under the proposed project, garbage would be kept in the Building Trash Room and Residential Trash Room and the trash collection loading zone would be located along Post Street. Garbage collection would be required to comply with the city's noise ordinance and therefore would not be more disruptive than under existing conditions.

Therefore, truck delivery and loading/unloading activity and parking lot noise associated with the proposed project would not cause a noticeable increase in existing noise levels on nearby sensitive receptors and this impact would be less than significant and no mitigation would be required.

**Impact C-NO-1: The proposed project, in combination with cumulative projects, could result in significant cumulative noise or vibration impacts. (Less than Significant with Mitigation)**

As shown in Table 2, p. 26, and depicted in Figure 18, p. 27, there are currently 10 cumulative development projects within an approximately 0.25-mile radius of the project site. Some or all of these projects may be under construction at the same time as the proposed project, and each would also add new sources of noise to the area once completed. For the purposes of the cumulative noise analysis, the nearest cumulative projects to the project site are the 1142 Van Ness Avenue and 1033 Polk Street projects, located approximately 60 feet and 170 feet south of the project site, respectively.

As described in Impact NO-2, the proposed project's construction activities would result in vibration impacts on the adjacent building at 1101-1127 Polk Street, which could cause building damage. This

[60] LSA. 2016. *Operational Noise Impact Analysis, Richmond Wholesale Meat Distribution Center, City of Richmond, California.* May.

building is also a historic resource. However with implementation of Mitigation Measure M-NO-2, this impact would be less than significant. In addition, the project would not result in vibration-related utility damage or sleep disturbance. Vibration impacts are highly localized and unlikely to combine with those of nearby projects. Therefore, given that there are no other cumulative projects directly adjacent to the proposed project, the proposed project would not have the potential to combine with nearby projects to result in cumulative vibration impacts. The remainder of this analysis addresses cumulative noise impacts.

**CONSTRUCTION NOISE**

Of the cumulative projects within 0.25 miles of the project site (refer to Table 2, p. 26, and Figure 18, p. 27), the closest are the 1142 Van Ness Avenue and 1033 Polk Street projects, located approximately 60 feet and 170 feet south of the project site, respectively. The 1142 Van Ness Avenue project would include some exterior work but would not include any building expansion. As such, construction activities associated with the proposed project, when combined with the 1142 Van Ness Avenue project, would not result in a cumulative construction noise impact. Construction activities associated with the 1033 Polk Street project could result in noise levels that could combine with the proposed project to result in a cumulative construction noise impact. All other cumulative project sites are separated from the proposed project by an extended distance. All other cumulative projects would have multiple existing buildings between them, and the project site that would provide shielding of their construction to limit the noise which combines with the project construction noise if they were to be constructed simultaneously. Also, construction at all the cumulative project sites would be subject to the same noise regulations as the proposed project, such as limiting construction hours and equipment noise levels. However, given the potential for the 1033 Polk Street project to be under construction simultaneously as the proposed project, cumulative construction noise could be substantial both in the increase in noise levels in the area and the duration that sensitive receptors experience construction noise. Therefore, the proposed project, in combination with the 1033 Polk Street project, would result in a significant construction noise impact. The proposed project would result in construction noise levels that are at least 16 dBA above ambient noise levels for the entire construction duration, and at times the project's construction noise would be approximately 21 dBA above the ambient. However, construction noise levels would fluctuate throughout the day depending upon the specific equipment being used at any one time. Therefore, the proposed project would contribute considerably to this significant cumulative impact.

**MITIGATION MEASURE**

Implement **Mitigation Measure M-NO-1: Construction Noise Control**, which addresses the project's contribution to cumulative construction noise.

***Significance after Mitigation.*** As discussed in Impact NOI-1, Mitigation Measure M-NO-1 would reduce construction noise levels at nearby noise-sensitive receptors. Although construction noise may at times exceed 10 dBA above the ambient noise level, or interior noise levels of 45 dBA at residential uses during nighttime hours, this mitigation measure would substantially reduce the intensity of construction noise and the temporal frequency and duration of construction noise that exceed 10 dBA above the ambient noise levels, or interior noise levels of 45 dBA at residential uses during nighttime hours. Furthermore, construction noise levels would be temporary and would not persist upon completion of construction activities. Individual pieces of construction equipment would also be required to comply with the noise limits in article 29 of the police code. Thus, with implementation of Mitigation Measure M-NO-1, the proposed project's contribution to cumulative construction noise impacts would be less than significant.

**OPERATIONAL NOISE**

The context for cumulative noise impacts are localized and generally confined to within 900 feet or less of the noise-generating activities on a project site.

As described above, the roadway segments that would experience the greatest increase in traffic noise levels with the proposed project would be Hemlock Street west of Polk Street (8.9 dBA increase) and Hemlock Street east of Van Ness Avenue (6.6 dBA increase). However, the resulting calculated noise level is more than 10 dBA lower than the monitored ambient noise levels. Therefore, the proposed project would not increase ambient noise levels. Because the calculated noise levels are more than 10 dBA lower than existing monitored noise levels, the proposed project in combination with cumulative projects would not result in a significant cumulative traffic noise impact and this impact would be less than significant.

In addition, stationary noise sources associated with the development at the proposed project, combined with stationary noise sources from other cumulative projects, could cause local noise level increases. Similar new fixed noise sources could be required for the cumulative projects near the project site, such as the 1142 Van Ness Avenue and 1033 Polk Street projects, located approximately 60 feet and 170 feet south of the project site, respectively. The proposed project's mechanical equipment and mechanical equipment from cumulative projects would be fairly localized, would attenuate with distance, and would be required to comply with the noise limits in the San Francisco Police Code that limit noise levels at the property plane and at residential interiors. Therefore, mechanical noise from the proposed project combined with that from cumulative projects would not combine to cause a significant cumulative noise impact.

Cumulative on-street loading noise would be confined to the block on which loading activities occur. None of the cumulative projects are located on the same block or have frontage on the same streets as the proposed project. Therefore, noise from the project's on-street loading activities would not combine with that of cumulative projects to result in a cumulative noise impact.

For the reasons described above, cumulative operational noise impacts would be less than significant and no mitigation measures would be required.

## 7. Air Quality

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project: | | | | | |
| a) Conflict with or obstruct implementation of the applicable air quality plan? | ☐ | ☐ | ☒ | ☐ | ☐ |
| b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard? | ☐ | ☐ | ☒ | ☐ | ☐ |

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| c) Expose sensitive receptors to substantial pollutant concentrations? | ☐ | ☒ | ☐ | ☐ | ☐ |
| d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | ☐ | ☐ | ☒ | ☐ | ☐ |

**SETTING**

***Overview.*** The Bay Area Air Quality Management District (or air district) is the regional agency with jurisdiction over the nine-county San Francisco Bay Area Air Basin (air basin), which includes San Francisco, Alameda, Contra Costa, Marin, San Mateo, Santa Clara, and Napa counties and portions of Sonoma and Solano counties. The air district is responsible for attaining and maintaining air quality in the air basin within federal and state air quality standards, as established by the federal Clean Air Act and the California Clean Air Act, respectively. Specifically, the air district has the responsibility to monitor ambient air pollutant levels throughout the air basin and to develop and implement strategies to attain the applicable federal and state standards. The federal and state Clean Air Acts require plans to be developed for areas that do not meet air quality standards, generally. The most recent air quality plan, the 2017 clean air plan, was adopted by the air district on April 19, 2017. The clean air plan updates the most recent Bay Area ozone plan, the 2010 clean air plan, in accordance with the requirements of the state Clean Air Act, to implement all feasible measures to reduce ozone; provide a control strategy to reduce ozone, particulate matter, air toxics, and greenhouse gases in a single, integrated plan; and establish emission control measures to be adopted or implemented. The clean air plan contains the following primary goals:

- Protect air quality and health at the regional and local scale: Attain all state and national air quality standards, and eliminate disparities among Bay Area communities in cancer health risk from toxic air contaminants; and

- Protect the climate: Reduce Bay Area greenhouse gas emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

The clean air plan represents the most current applicable air quality plan for the air basin. Consistency with this plan is the basis for determining whether the proposed project would conflict with or obstruct implementation of air quality plans.

***Criteria Air Pollutants.*** In accordance with the state and federal Clean Air Acts, air pollutant standards are identified for the following six criteria air pollutants: ozone, carbon monoxide (CO), particulate matter (PM), nitrogen dioxide ($NO_2$), sulfur dioxide ($SO_2$), and lead. These air pollutants are termed criteria air pollutants because they are regulated by developing specific public health- and welfare-based criteria as the basis for setting permissible levels. In general, the air basin experiences low concentrations of most pollutants when

compared to federal or state standards. The air basin is designated as either in attainment[61] or unclassified for most criteria pollutants with the exception of ozone, $PM_{2.5}$, and $PM_{10}$, for which these pollutants are designated as non-attainment for either the state or federal standards. By its very nature, regional air pollution is largely a cumulative impact in that no single project is sufficient in size to, by itself, result in non-attainment of air quality standards. Instead, a project's individual emissions contribute to existing cumulative air quality impacts. If a project's contribution to cumulative air quality impacts is considerable, then the project's impact on air quality would be considered significant.[62]

Land use projects may contribute to regional criteria air pollutants during the construction and operational phases of a project. **Table 16, Criteria Air Pollutant Significance Thresholds,** identifies air quality significance thresholds followed by a discussion of each threshold. Projects that would result in criteria air pollutant emissions below these significance thresholds would not result in a cumulatively considerable net increase of non-attainment criteria air pollutants within the air basin.

### Table 16: Criteria Air Pollutant Significance Thresholds

| Pollutant | Construction Thresholds | Operational Thresholds | |
|---|---|---|---|
| | Average Daily Emissions (lbs./day) | Average Daily Emissions (lbs./day) | Maximum Annual Emissions (tons/year) |
| ROG | 54 | 54 | 10 |
| $NO_x$ | 54 | 54 | 10 |
| $PM_{10}$ | 82 (exhaust) | 82 | 15 |
| $PM_{2.5}$ | 54 (exhaust) | 54 | 10 |
| Fugitive Dust | Construction Dust Ordinance or other Best Management Practices | Not Applicable | |

Source: California Environmental Quality Act Air Quality Guidelines, page 2-2 (Bay Area Air Quality Management District, May 2017).

***Ozone Precursors.*** As discussed previously, the air basin is currently designated as non-attainment for ozone and particulate matter. Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG) and oxides of nitrogen ($NO_x$). The potential for a project to result in a cumulatively considerable net increase in non-attainment criteria air pollutants are based on the state and federal Clean Air Acts emissions limits for stationary sources. To ensure that new stationary sources do not cause or contribute to a violation of an air quality standard, air district regulation 2, rule 2 requires that any new source that emits criteria air pollutants above a specified emissions limit must offset those emissions. For ozone precursors ROG and $NO_x$, the offset emissions level is an annual average of 10 tons per year (or 54 pounds [lbs.] per day).[63] These levels represent emissions below which new sources are not anticipated to result in a considerable net increase in non-attainment criteria air pollutants.

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61 "Attainment" status refers to those regions that are meeting federal and/or state standards for a specified criteria pollutant. "Non-attainment" refers to regions that do not meet federal and/or state standards for a specified criteria pollutant. "Unclassified" refers to regions where there is not enough data to determine the region's attainment status for a specified criteria air pollutant.

62 Bay Area Air Quality Management District, *California Environmental Quality Act Air Quality Guidelines,* May 2017, page 2-1.

63 Bay Area Air Quality Management District, Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance, October 2009, page 17.

Although this regulation applies to new or modified stationary sources, land use development projects emit ROG and $NO_x$ as a result of increases in vehicle trips, architectural coating, and construction activities. Therefore, the above thresholds can be applied to the construction and operational phases of land use projects and those projects that result in emissions below these thresholds would not be considered to contribute to non-attainment ozone impacts as a result of ROG and $NO_x$ emissions. Due to the temporary nature of construction activities, only the average daily thresholds are applicable to construction phase emissions.

***Particulate Matter ($PM_{10}$ and $PM_{2.5}$).***[64] The air district has not established an offset limit for $PM_{2.5}$. However, the emissions limit in the federal New Source Review for stationary sources in nonattainment areas is an appropriate significance threshold. For $PM_{10}$ and $PM_{2.5}$, the emissions limit under New Source Review is 15 tons per year (82 lbs. per day) and 10 tons per year (54 lbs. per day), respectively. These emissions limits represent levels below which a source is not expected to have an impact on air quality.[65] Similar to ozone precursor thresholds identified above, land use development projects typically result in particulate matter emissions as a result of increases in vehicle trips, space heating and natural gas combustion, landscape maintenance, and construction activities. Therefore, the above thresholds can be applied to the construction and operational phases of a land use project. Again, because construction activities are temporary in nature, only the average daily thresholds are applicable to construction-phase emissions.

***Fugitive Dust.*** Fugitive dust emissions are typically generated during construction phases. Studies have shown that the application of best management practices at construction sites significantly control fugitive dust[66] and individual measures have been shown to reduce fugitive dust by anywhere from 30 to 90 percent.[67] The air district has identified a number of best management practices to control fugitive dust emissions from construction activities.[68] The city's Construction Dust Control Ordinance (Ordinance No. 176-08, effective July 30, 2008) requires a number of measures to control fugitive dust and the best management practices employed in compliance with the city's Construction Dust Control Ordinance are an effective strategy for controlling construction-related fugitive dust.

***Other Criteria Pollutants.*** Regional concentrations of CO in the Bay Area have not exceeded the state standards in the past 11 years and $SO_2$ concentrations have never exceeded the standards. The primary source of CO emissions from development projects is vehicle traffic. Construction-related $SO_2$ emissions represent a negligible portion of the total basin-wide emissions and construction-related CO emissions represent less than 5 percent of the Bay Area total basin-wide CO emissions. As discussed previously, the Bay Area is in attainment for both CO and $SO_2$. Furthermore, the air district has demonstrated, based on modeling, that in order to exceed the California ambient air quality standard of 9.0 ppm (8-hour average) or 20.0 ppm (1-hour average) for CO, project traffic in addition to existing traffic would need to exceed 44,000 vehicles per hour at affected intersections (or 24,000 vehicles per hour where vertical and/or horizontal mixing is limited). As shown in Table 15, p. 92, in Section E.6. Noise, above, with the proposed project, Van Ness Avenue south of Post Street would experience total average daily vehicle trips of 19,600, which is

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64 $PM_{10}$ is often termed "coarse" particulate matter and is made of particulates that are 10 microns in diameter or smaller. $PM_{2.5}$, termed "fine" particulate matter, is composed of particles that are 2.5 microns or less in diameter.

65 Bay Area Air Quality Management District, Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance, October 2009, page 16.

66 Western Regional Air Partnership. *2006. WRAP Fugitive Dust Handbook.* September 7, 2006. This document is available online at http://www.wrapair.org/forums/dejf/fdh/content/FDHandbook_Rev_06.pdf, accessed February 16, 2012.

67 Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, May 2017, page D-47.

68 Ibid.

substantially below the traffic screening levels cited above. Therefore, given the Bay Area's attainment status and the limited CO and $SO_2$ emissions that could result from development projects, development projects would not result in a cumulatively considerable net increase in CO or $SO_2$ emissions, and quantitative analysis is not required.

**LOCAL HEALTH RISKS AND HAZARDS**

In addition to criteria air pollutants, individual projects may emit toxic air contaminants (TACs). TACs collectively refer to a diverse group of air pollutants that are capable of causing chronic (i.e., of long-duration) and acute (i.e., severe but short-term) adverse effects to human health, including carcinogenic effects. Human health effects of TACs include birth defects, neurological damage, cancer, and mortality. There are hundreds of different types of TACs with varying degrees of toxicity. Individual TACs vary greatly in the health risk they present; at a given level of exposure, one TAC may pose a hazard that is many times greater than another.

Unlike criteria air pollutants, TACs do not have ambient air quality standards but are regulated by the air district using a risk-based approach to determine which sources and pollutants to control as well as the degree of control. A health risk assessment is an analysis in which human health exposure to toxic substances is estimated and considered together with information regarding the toxic potency of the substances, to provide quantitative estimates of health risks.[69]

Air pollution does not affect every individual in the population in the same way, and some groups are more sensitive to adverse health effects than others. Land uses such as residences, schools, children's day care centers, hospitals, and nursing and convalescent homes are considered to be the most sensitive to poor air quality because the population groups associated with these uses have increased susceptibility to respiratory distress or, as in the case of residential receptors, their exposure time is greater than that for other land uses. Therefore, these groups are referred to as sensitive receptors. Exposure assessment guidance typically assumes that residences would be exposed to air pollution 24 hours per day, 7 days a week, for 30 years.[70] Therefore, assessments of air pollutant exposure to residents typically result in the greatest adverse health outcomes of all population groups.

Exposures to fine particulate matter ($PM_{2.5}$) are strongly associated with mortality, respiratory diseases, and lung development in children, and other endpoints such as hospitalization for cardiopulmonary disease.[71] In addition to $PM_{2.5}$, diesel particulate matter (DPM) is also of concern. The California Air Resources Board (California air board) identified diesel particulate matter as a toxic air contaminant in 1998, primarily based on evidence demonstrating cancer effects in humans.[72] The estimated cancer risk from exposure to diesel exhaust is much higher than the risk associated with any other TAC routinely measured in the region.

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69 In general, a health risk assessment is required if the air district concludes that projected emissions of a specific air toxic compound from a proposed new or modified source suggest a potential public health risk. The applicant is then subject to a health risk assessment for the source in question. Such an assessment generally evaluates chronic, long-term effects, estimating the increased risk of cancer as a result of exposure to one or more TACs.

70 California Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spot Program Risk Assessment Guidelines*, February, 2015. Pg. 4-44, 8-6

71 SFDPH, Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review, May 2008.

72 California Air Resources Board (ARB), Fact Sheet, "The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines," October 1998.

In an effort to identify areas of San Francisco most adversely affected by sources of TACs, San Francisco partnered with the air district to conduct a citywide health risk assessment based on an inventory and assessment of air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed the "Air Pollutant Exposure Zone," were identified based on health-protective criteria that consider estimated cancer risk, exposures to fine particulate matter, proximity to freeways, and locations with particularly vulnerable populations. At the time the project application was submitted, the project site was not located within the Air Pollutant Exposure Zone; however, the site is within the current 2020 Air Pollutant Exposure Zone map. Each of the Air Pollutant Exposure Zone criteria is discussed below.

***Excess Cancer Risk.*** The Air Pollutant Exposure Zone includes areas where modeled cancer risk exceeds 100 incidents per million persons exposed. This criterion is based on United States Environmental Protection Agency (EPA) guidance for conducting air toxic analyses and making risk management decisions at the facility and community-scale level.[73] As described by the air district, the EPA considers a cancer risk of 100 per million to be within the "acceptable" range of cancer risk. Furthermore, in the 1989 preamble to the benzene National Emissions Standards for Hazardous Air Pollutants rulemaking,[74] the EPA states that it "…strives to provide maximum feasible protection against risks to health from hazardous air pollutants by (1) protecting the greatest number of persons possible to an individual lifetime risk level no higher than approximately one in one million and (2) limiting to no higher than approximately one in ten thousand [100 in one million] the estimated risk that a person living near a plant would have if he or she were exposed to the maximum pollutant concentrations for 70 years." The 100 per one million excess cancer cases is also consistent with the ambient cancer risk in the most pristine portions of the Bay Area based on air district regional modeling.[75]

***Fine Particulate Matter.*** In April 2011, the EPA published Policy Assessment for the Particulate Matter Review of the National Ambient Air Quality Standards, "Particulate Matter Policy Assessment." In this document, USEPA staff conclude that the then-current federal annual $PM_{2.5}$ standard of 15 µg/m$^3$ should be revised to a level within the range of 13 to 11 µg/m$^3$, with evidence strongly supporting a standard within the range of 12 to 11 µg/m$^3$. In December 2012, the USEPA strengthened the annual $PM_{2.5}$ standard from 15 to 12 µg/m$^3$ and issued final area designations based on that standard. The USEPA published a new policy assessment in January 2020.[76] The policy assessment did not include recommendations to change the standards for particulate matter. Air Pollutant Exposure Zones for San Francisco are based on the health-protective $PM_{2.5}$ standard of 11 µg/m$^3$, as supported by the USEPA Policy Assessment for the Particulate Matter Review of the National Ambient Air Quality Standards, although lowered to 10 µg/m$^3$ to account for uncertainty in accurately predicting air pollutant concentrations using emissions modeling programs.

***Proximity to Freeways.*** According to the California Air Resources Board (air board), studies have shown an association between the proximity of sensitive land uses to freeways and a variety of respiratory symptoms,

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73 Bay Area Air Quality Management District, Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance, October 2009, page 67.

74 54 Federal Register 38044, September 14, 1989.

75 Bay Area Air Quality Management District, *Clean Air Plan,* May 2017, page D-43.

76 USEPA, Policy Assessment for the Review of the National Ambient Air Quality Standards for Particulate Matter, January 2020, https://www.epa.gov/sites/production/files/2020-01/documents/final_policy_assessment_for_the_review_of_the_pm_naaqs_01-2020.pdf, and https://www.epa.gov/pm-pollution/national-ambient-air-quality-standards-naaqs-pm, accessed November 9, 2020.

asthma exacerbations, and decreases in lung function in children. Siting sensitive uses in close proximity to freeways increases both exposure to air pollution and the potential for adverse health effects. As evidence shows that sensitive uses in an area within a 500-foot buffer of any freeway are at an increased health risk from air pollution,[77] parcels that are within 500 feet of freeways are included in the Air Pollutant Exposure Zone.

***Health Vulnerable Locations.*** Based on the air district's evaluation of health vulnerability in the Bay Area, those zip codes (94102, 94103, 94110, 94124, and 94130) in the worst quintile of Bay Area health vulnerability scores as a result of air pollution-related causes were afforded additional protection by lowering the standards for identifying parcels in the Air Pollutant Exposure Zone to: (1) an excess cancer risk greater than 90 per one million persons exposed, and/or (2) $PM_{2.5}$ concentrations in excess of 9 $\mu g/m^3$.[78]

The citywide health risk modeling is also referred to in the Enhanced Ventilation Required for Urban Infill Sensitive Use Developments or Health Code, article 38 (Ordinance No. 224-14, effective December 8, 2014) (article 38). The purpose of article 38 is to protect the public health and welfare by establishing an Air Pollutant Exposure Zone and imposing an enhanced ventilation requirement for all urban infill sensitive use development within the Air Pollutant Exposure Zone. As mentioned above, at the time the project application was submitted, the project site was not located within the Air Pollutant Exposure Zone; therefore, the proposed project is not subject to article 38. However, the project site is currently located within an Air Pollutant Exposure Zone. Projects within the Air Pollutant Exposure Zone require special consideration to determine whether the project's activities would add a substantial amount of emissions to areas already adversely affected by poor air quality.

**Impact AQ-1: The proposed project would not conflict with, or obstruct implementation of, the clean air plan. (Less than Significant)**

The most recently adopted air quality plan for the air basin is the air district's 2017 clean air plan. The clean air plan is a road map that demonstrates how the San Francisco Bay Area will achieve compliance with the state ozone standards as expeditiously as practicable and how the region will reduce the transport of ozone and ozone precursors to neighboring air basins. In determining consistency with the clean air plan, this analysis considers whether the project would: (1) support the primary goals of the clean air plan; (2) include applicable control measures from the clean air plan; and (3) avoid disrupting or hindering implementation of control measures identified in the clean air plan.

The primary goals of the clean air plan are to: (1) Protect air quality and health at the regional and local scale; (2) eliminate disparities among Bay Area communities in cancer health risk from toxic air contaminants; and (3) protect the climate by reducing greenhouse gas emissions. To meet the primary goals, the clean air plan recommends specific control measures and actions. These control measures are grouped into various categories and include stationary and area source measures, mobile source measures, transportation control measures, land use measures, and energy and climate measures. The clean air plan recognizes that to a great extent, community design dictates individual travel mode, and that a key long-term control strategy to reduce emissions of criteria pollutants, air toxics, and greenhouse gases from motor

[77] California Air Resources Board, *Air Quality and Land Use Handbook: A Community Health Perspective.* April 2005. Available online at: http://www.arb.ca.gov/ch/landuse.htm.

[78] San Francisco Planning Department and San Francisco Department of Public Health, *San Francisco Citywide Health Risk Assessment: Technical Support Documentation.* September 2020.

vehicles is to channel future Bay Area growth into vibrant urban communities where goods and services are close at hand, and people have a range of viable transportation options. To this end, the clean air plan includes 85 control measures aimed at reducing air pollution in the air basin.

The measures most applicable to the proposed project are transportation control measures and energy and climate control measures. The proposed project's impact with respect to greenhouse gases are discussed in Section E.8, Greenhouse Gas Emissions, which demonstrates that the proposed project would comply with the applicable provisions of the city's greenhouse gas reduction strategy.

The infill nature of the proposed project and high availability of viable transportation options would ensure that residents, employees, patients, and visitors could bicycle, walk, and ride transit to and from the project site instead of taking trips via private automobile. These features would ensure that the project would avoid substantial growth in automobile trips and VMT. Control measures that are identified in the clean air plan are implemented by the San Francisco General Plan and the planning code, for example, through the city's Transit First Policy, bicycle parking requirements, transportation demand management program requirements, and transit impact development fees. Compliance with these requirements would ensure the project includes relevant transportation control measures specified in the clean air plan. Therefore, the proposed project would include applicable control measures identified in the clean air plan to the meet the clean air plan's primary goals.

Examples of a project that could cause the disruption or delay of clean air plan control measures are projects that would preclude the extension of a transit line or bike path, or projects that propose excessive parking beyond parking requirements. The proposed project would consist of approximately 106,700 gsf of health service use, approximately 130,170 gsf of residential use (107 units), approximately 24,520 gsf of retail space, and 4,340 gsf of restaurant space within a dense, walkable urban area near a concentration of regional and local transit service. It would not preclude the extension of a transit line or a bike path or any other transit improvement and would not include an excessive amount of parking beyond what is required, and thus would not disrupt or hinder implementation of control measures identified in the clean air plan.

For the reasons described above, the proposed project would not interfere with implementation of the clean air plan, and because the proposed project would be consistent with the applicable air quality plan that demonstrates how the region will improve ambient air quality and achieve the state and federal ambient air quality standards, this impact would be less than significant and no mitigation would be required.

**Impact AQ-2: The proposed project's construction activities would generate fugitive dust and criteria air pollutants, but would not result in a cumulatively considerable net increase of non-attainment criteria air pollutants within the air basin. (Less than Significant)**

Construction activities (short-term) typically result in emissions of ozone precursors and fine particulate matter in the form of dust (fugitive dust) and exhaust (e.g., vehicle tailpipe emissions). Emissions of ozone precursors and fine particular matter are primarily a result of the combustion of fuel from on-road and off-road vehicles. However, ROGs are also emitted from activities that involve painting, other types of architectural coatings, or asphalt paving. The proposed project would occur over an approximately 25-month period and would consist of the following partially overlapping phases: (1) demolition; (2) excavation and shoring; (3) foundation and below-grade construction; (4) base building; (5) exterior finishing; and (6) interior finishing. During the project's approximately 25-month construction period, construction activities

would have the potential to result in emissions of ozone precursors and fine particulate matter, as discussed below.

***Fugitive Dust.*** Project-related demolition, excavation, grading, and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. Depending on exposure, adverse health effects can occur due to this particulate matter in general and also due to specific contaminants such as lead or asbestos that may be constituents of soil. Although there are federal standards for air pollutants and implementation of state and regional air quality control plans, air pollutants continue to have impacts on human health throughout the country. California has found that particulate matter exposure can cause health effects at lower levels than national standards. The current health burden of particulate matter demands that, where possible, public agencies take feasible available actions to reduce sources of particulate matter exposure. According to the California air board, reducing $PM_{2.5}$ concentrations to state and federal standards of 12 $\mu g/m^3$ in the San Francisco Bay Area would prevent between 200 and 1,300 premature deaths.[79]

In response, the San Francisco Board of Supervisors approved the Construction Dust Control Ordinance (Ordinance No. 176-08, effective July 30, 2008) with the intent of reducing the quantity of dust generated during site preparation, demolition and construction work in order to protect the health of the general public and of on-site workers, minimize public nuisance complaints, and to avoid orders to stop work by the Department of Building Inspection.

The Construction Dust Control Ordinance requires that all site preparation work, demolition, or other construction activities within San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures whether or not the activity requires a permit from the Department of Building Inspection. The Director of the Department of Building Inspection may waive this requirement for activities on sites less than 0.5 acres that are unlikely to result in any visible wind-blown dust.

For projects over 0.5 acre, such as the proposed project, the Dust Control Ordinance requires that the project sponsor submit a dust control plan for approval by the San Francisco Department of Public Health. The Department of Building Inspection will not issue a building permit without written notification from the Director of Public Health that the applicant has a site-specific dust control plan unless the director waives the requirement.

The site-specific dust control plan would require the project sponsor to: submit a map to the Director of Public Health showing all sensitive receptors within 1,000 feet of the site; wet down areas of soil at least three times per day; provide an analysis of wind direction and install upwind and downwind particulate dust monitors; record particulate monitoring results; hire an independent, third-party to conduct inspections and keep a record of those inspections; establish shut-down conditions based on wind, soil migration, etc.; establish a hotline for surrounding community members who may be potentially affected by project-related dust; limit the area subject to construction activities at any one time; install dust curtains and windbreaks on the property lines, as necessary; limit the amount of soil in hauling trucks to the size of the truck bed and securing with a tarpaulin; enforce a 15-mph speed limit for vehicles entering and exiting construction areas; sweep affected streets with water sweepers at the end of the day; install and utilize wheel washers to clean

[79] Air Resources Board, Methodology for Estimating Premature Deaths Associated with Long-term Exposure to Fine Airborne Particulate Matter in California, Staff Report, Table 4c, October 24, 2008.

truck tires; terminate construction activities when winds exceed 25 miles per hour; apply soil stabilizers to inactive areas; and sweep off adjacent streets to reduce particulate emissions. The project sponsor would be required to designate an individual to monitor compliance with these dust control requirements.

San Francisco Ordinance No. 175-91 restricts the use of potable water for soil compaction and dust control activities undertaken in conjunction with any construction or demolition project occurring within the boundaries of San Francisco, unless permission is obtained from the San Francisco Public Utilities Commission. Non-potable water must be used for soil compaction and dust control activities during project construction and demolition. The San Francisco Public Utilities Commission operates a recycled water truck-fill station at the Southeast Water Pollution Control Plant that provides recycled water for these activities at no charge.

Compliance with the regulations and procedures set forth by the Dust Control Ordinance would ensure that potential dust-related air quality impacts would be reduced to a less-than-significant level and no mitigation would be required.

***Construction Criteria Air Pollutants.*** As discussed above, construction activities would result in emissions of criteria air pollutants from the use of off- and on-road vehicles and equipment. A quantitative analysis of the proposed project's construction criteria air pollutant emissions was conducted to determine whether the project may exceed the criteria air pollutant significance thresholds shown in Table 16, p. 99. Construction-related criteria air pollutants generated by the proposed project were quantified using the California Emissions Estimator Model (CalEEMod) and provided within an Air Quality Criteria Pollutant Analysis.[80, 81] The model was developed, including default data (e.g., emission factors, meteorology, etc.), in collaboration with California regional air districts' staff. Default assumptions were used where project-specific information was unknown. The proposed project would use Tier 3 and Tier 4 construction equipment, which is included in CalEEMod. Construction of the proposed project would occur over an approximately 25-month period with approximately 514 working days. Emissions were converted from tons/year to lbs/day using the estimated construction duration of 514 working days. Additional assumptions, methodology for calculating criteria air pollutants, and detailed results by construction phase are provided in the Air Quality Criteria Air Pollutant Analysis. Construction-related emissions are presented in **Table 17, Average Daily Project Construction Emissions**.

### Table 17: Average Daily Project Construction Emissions

| Emissions/Threshold | Pollutant Emissions (Average Pounds per Day) | | | |
|---|---|---|---|---|
| | ROG | $NO_x$ | Exhaust $PM_{10}$ | Exhaust $PM_{2.5}$ |
| Average Daily Construction Emissions | 7.1 | 10.5 | 0.3 | 0.3 |
| Significance Threshold | 54.0 | 54.0 | 82.0 | 54.0 |

Source: Bay Area Air Quality Management District (2017); LSA (March 2021).

[80] LSA. 1200 Van Ness Project (Case File No. 2015-012577ENV) - Air Quality Criteria Pollutant Analysis. March 2021.

[81] The original application materials submitted by the project sponsor assumed development of approximately 133,214 gsf of residential use, 115,898 gsf of health service use, 21,112 gsf of retail/commercial use, and 4,615 gsf of restaurant use. Since preparation of the air quality analysis, the proposed square footages were refined to 130,170 gsf of residential use, 106,700 gsf of health services, 24,520 gsf of retail/commercial uses, and 4,340 gsf of restaurant use, as identified in Table 1, resulting in 90 average daily vehicle trips less than the previous analysis. While the air quality analysis is based on the previously proposed square footages, the difference would have a negligible effect on the analysis outcome for emission levels, which remain conservative. Therefore, no change to the analysis was necessary as a result of the minor revisions to the proposed square footages.

As shown in Table 17, project construction emissions would be below the threshold of significance for ROG, $NO_x$, $PM_{2.5}$, and $PM_{10}$ exhaust emissions. Therefore, the proposed project would not exceed any of the significance thresholds for criteria air pollutants, and would result in less-than-significant impact with respect to criteria air pollutant emissions during construction. No mitigation would be required.

**Impact AQ-3: During project operations, the proposed project would result in emissions of criteria air pollutants, but not at levels that would result in a cumulatively considerable net increase in non-attainment criteria air pollutants. (Less than Significant)**

The proposed project would generate criteria pollutant emissions associated with vehicle traffic (mobile sources), on-site area sources (i.e., natural gas combustion for space and water heating, and combustion of other fuels by building and grounds maintenance equipment), energy usage, and testing of two backup diesel generators (stationary sources). Operational-related criteria air pollutants generated by the proposed project were also quantified using CalEEMod and provided within an Air Quality Criteria Pollutant Analysis.[82], [83] Default assumptions were used where project-specific information was unknown. Refer to the Air Quality Criteria Air Pollutant Analysis for detailed assumptions, methodology and results.

The maximum daily and annual emissions associated with operation of the proposed project are shown in **Table 18, Summary of Operational Criteria Air Pollutant Emissions,** p. 108. Table 18 also includes the thresholds of significance for criteria for air pollutant impacts.

As shown in Table 18, the proposed project would not exceed any of the significance thresholds for criteria air pollutants. With respect to criteria air pollutants, this impact would be less than significant and no mitigation would be required.

**Impact AQ-4: The proposed project's construction and operational activities would generate toxic air contaminants, including diesel particulate matter, that would expose sensitive receptors to substantial pollutant concentrations. (Less than Significant with Mitigation)**

As discussed above, at the time the project application was submitted, the project site was not located within the Air Pollutant Exposure Zone; however, the proposed project is located within the 2020 Air Pollutant Exposure Zone. Sensitive land uses are located near the project site, including: a three-story building containing residential and retail uses (1101-1127 Polk Street), an 11-story mixed-use residential building (1285 Sutter Street), one- to three-story residential buildings (1115-1151 Post Street), and a mixed-use building containing retail, healthcare, and residential uses (1 Daniel Burnham Court).

[82] LSA. 1200 Van Ness Project (Case File No. 2015-012577ENV) - Air Quality Criteria Pollutant Analysis. March 2021.

[83] The original application materials submitted by the project sponsor assumed development of 133,214 gsf of residential use, 115,898 gsf of health services, 21,112 gsf of retail/commercial uses, and 4,615 gsf of restaurant uses. Since preparation of the analysis, the square footages were revised to 130,170 gsf of residential use, 106,700 gsf of health services, 24,520 gsf of retail/commercial uses, and 4,340 gsf of restaurant uses, resulting in 90 average daily vehicle trips less than the previous analysis. While the air quality analysis is based on the previously proposed square footages, the difference would have a negligible effect on the analysis outcome for air quality emissions. Therefore, no change to the analysis was necessary as a result of the minor revisions in square footages.

## Table 18: Summary of Operational Criteria Air Pollutant Emissions

| | ROG | NOx | $PM_{10}$ | $PM_{2.5}$ |
|---|---|---|---|---|
| **Pounds per Day** | | | | |
| Area Source Emissions | 7.0 | 0.8 | 0.1 | 0.1 |
| Energy Source Emissions | 0.1 | 0.8 | 0.1 | 0.1 |
| Mobile Source Emissions | 4.0 | 12.6 | 9.5 | 2.6 |
| Stationary Source Emissions | 0.7 | 3.1 | 0.1 | 0.1 |
| **Total Project Maximum Daily Emissions (lbs/day)** | **11.7** | **17.3** | **9.8** | **2.9** |
| Significance Threshold (lbs/day) | 54.0 | 54.0 | 82.0 | 54.0 |
| **Tons per Year** | | | | |
| Area Source Emissions | 1.2 | <0.1 | <0.1 | <0.1 |
| Energy Source Emissions | <0.1 | 0.2 | <0.1 | <0.1 |
| Mobile Source Emissions | 0.6 | 2.3 | 1.7 | 0.5 |
| Stationary Source Emissions | 0.1 | 0.6 | <0.1 | <0.1 |
| **Total Project Annual Emissions (tpy)** | **2.0** | **3.0** | **1.7** | **0.5** |
| Significance Threshold (tpy) | 10.0 | 10.0 | 15.0 | 10.0 |

Source: Bay Area Air Quality Management District (2017); LSA (December 2020).
lbs/day = pounds per day
tpy = tons per year

***Construction Emissions.*** With regards to construction emissions, off-road equipment (which includes construction-related equipment) is a large contributor to diesel particulate matter emissions in California.[84] According to the air board, off-road equipment, which includes construction equipment, was the third largest source of mobile particulate matter emissions in California in 2012, the latest year for which inventory data is available.[85]

Additionally, a number of federal and state regulations are requiring cleaner off-road equipment. Specifically, both the EPA and California air board have set emissions standards for new off-road equipment engines, ranging from Tier 1 to Tier 4. Tier 1 emission standards were phased in between 1996 and 2000 and Tier 4 Interim and Final emission standards for all new engines were phased in between 2008 and 2015. Although the full benefits of these regulations will not be realized for several years, the EPA estimates that by implementing the federal Tier 4 standards, $NO_x$ and PM emissions will be reduced by more than 90 percent.[86]

In addition, construction activities do not lend themselves to analysis of long-term health risks because of their temporary and variable nature. As explained in the air district's CEQA Air Quality Guidelines:

[84] Air Resources Board, Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements, p.1 and p. 13 (Figure 4), October 2010.
[85] Air Resources Board, 2017, 2012 Base Year Emissions, Off-Road Sources, Available: https://ww3.arb.ca.gov/ei/emissiondata.htm. Accessed February 3, 2021.
[86] US Environmental Protection Agency, "Clean Air Nonroad Diesel Rule: Fact Sheet," May 2004.

> "Due to the variable nature of construction activity, the generation of TAC emissions in most cases would be temporary, especially considering the short amount of time such equipment is typically within an influential distance that would result in the exposure of sensitive receptors to substantial concentrations. Concentrations of mobile-source diesel PM emissions are typically reduced by 70 percent at a distance of approximately 500 feet (ARB 2005). In addition, current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 40, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. This results in difficulties with producing accurate estimates of health risk."[87]

Therefore, project-level analyses of construction activities have a tendency to produce overestimated assessments of long-term health risks. However, as discussed above, additional construction activity may adversely affect populations that are already at a higher risk for adverse long-term health risks from existing sources of air pollution.

Construction activities would occur over the approximate 25-month construction period. Project construction activities would result in short-term emissions of diesel particulate matter and other TACs. The project site is located in an area that already experiences poor air quality and project construction activities would generate additional air pollution, affecting nearby sensitive receptors, resulting in a significant impact. However, implementation of Mitigation Measure M-AQ-4 would require the use of Tier 4 construction equipment which would reduce diesel particulate matter by 93 to 96 percent. Therefore, implementation of **Mitigation Measure M-AQ-4, Clean Off-road Construction Equipment**, would reduce the magnitude of this impact to a less-than-significant level.

**MITIGATION MEASURE**

**Mitigation Measure M-AQ-4** **Clean Off-Road Construction Equipment.** The project sponsor shall comply with the following:

**A. Engine Requirements**

1. All off-road equipment greater than 25 hp and operating for more than 20 total hours over the entire duration of construction activities shall have engines that meet or exceed either U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 4 Interim or Tier 4 Final off-road emission standards.

2. Where access to alternative sources of power are available, portable diesel engines (e.g., generators) shall be prohibited.

3. Diesel engines, whether for off-road or on-road equipment, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions). The contractor shall post legible and

[87] Bay Area Air Quality Management District, *CEQA Air Quality Guidelines,* May 2017, page 8-7.

visible signs in English, Spanish, and Chinese, in designated queuing areas and at the construction site to remind operators of the two minute idling limit.

4. The project sponsor shall instruct construction workers and equipment operators on the maintenance and tuning of construction equipment and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications.

**B. Waivers**

1. The planning department's environmental review officer or designee (ERO) may waive the alternative source of power requirement of Subsection (A)(2) if an alternative source of power is limited or infeasible at the project site. If the ERO grants the waiver, the contractor must submit documentation that the equipment used for on-site power generation meets the requirements of Subsection (A)(1).

2. The ERO may waive the equipment requirements of Subsection (A)(1) if: a particular piece of off-road equipment is technically not feasible; the equipment would not produce desired emissions reduction due to expected operating modes; or there is a compelling emergency need to use off-road equipment that is not Tier 4 compliant. If the ERO grants the waiver, the contractor must use the next cleanest piece of off-road equipment, according to the following, or another alternative that results in comparable reductions of diesel particulate matter.

| Off-Road Equipment Compliance Step-Down Schedule | | |
|---|---|---|
| **Compliance Alternative** | **Engine Emission Standard** | **Emissions Control** |
| 1 | Tier 2 | ARB Level 3 VDECS |
| 2 | Tier 2 | ARB Level 2 VDECS |
| 3 | Tier 2 | ARB Level 1 VDECS |
| 4 | Tier 2 | Alternative Fuel* |

**How to Use the Table:** If the ERO determines that the equipment requirements cannot be met, then the project sponsor would need to meet Compliance Alternative 1. If the ERO determines that the contractor cannot supply off-road equipment meeting Compliance Alternative 1, then the contractor must meet Compliance Alternative 2. If the ERO determines that the contractor cannot supply off-road equipment meeting Compliance Alternative 2, then the contractor must meet Compliance Alternative 3.
* Alternative fuels are not a VDECS.

**C. Construction Emissions Minimization Plan:** Before starting on-site construction activities, the contractor shall submit a construction emissions minimization plan (plan) to the ERO for review and approval.

The plan shall state, in reasonable detail, how the contractor will meet the requirements of section A.

1. The plan shall include estimates of the construction timeline by phase, with a description of each piece of off-road equipment required for every construction phase. The description may include (as reasonably available at the time of plan submission), but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For VDECS installed, the description may include: technology type, serial number, make, model, manufacturer, ARB verification number level, and installation date and hour meter reading on installation date. For off-road equipment using alternative fuels, the description shall also specify the type of alternative fuel being used.

2. The project sponsor shall ensure that all applicable requirements of the plan have been incorporated into the contract specifications. The plan shall include a certification statement that the project sponsor agrees to comply fully with the plan.

3. The project sponsor shall make the plan available to the public for review on site during working hours. The project sponsor shall post at the construction site a legible and visible sign summarizing the plan. The sign shall also state that the public may ask to inspect the plan for the project at any time during working hours and shall explain how to request to inspect the plan. The project sponsor shall post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way.

**D. Monitoring:** After start of construction activities, the contractor shall submit reports every six months to the ERO documenting compliance with the plan. After completion of construction activities and prior to receiving a final certificate of occupancy, the project sponsor shall submit to the ERO a final report summarizing construction activities, including the start and end dates and duration of each construction phase, and the specific information required in the plan.

***Significance after Mitigation.*** While emission reductions from limiting idling, educating workers, and properly maintaining equipment are difficult to quantify, other measures, specifically the requirement for equipment with Tier 4 compliant emissions, can reduce construction emissions by 93 to 96 percent

compared to equipment with engines meeting Tier 1 or Tier 2 emission standards.[88] Therefore, compliance with Mitigation Measure M-AQ-4 would reduce construction toxic air contaminant emissions impacts on nearby sensitive receptors to a less-than-significant level.

***Operational Emissions.*** The proposed project would generate new vehicle trips and also include two backup emergency generators, both of which are sources of toxic air contaminants.

***Vehicle Trips.*** Individual projects result in emissions of toxic air contaminants primarily as a result of an increase in vehicle trips. The air district considers roads with less than 10,000 vehicles per day to be "minor low-impact sources," stating that these sources "do not pose a significant health impact even in combination with other nearby sources. These determinations were made through extensive modeling, sources tests, and evaluation of their TAC emissions."[89] The proposed project's 3,503 average daily vehicle trips would be well below this level and would be distributed among the local roadway network, therefore an assessment of project-generated toxic air contaminants resulting from vehicle trips is not required and the proposed project would not generate a substantial amount of vehicle-generated toxic air contaminant emissions that could affect nearby sensitive receptors.

***On-Site Diesel Generators.*** The proposed project would also include two 1,490 brake-horsepower backup emergency diesel generators. One of the emergency generators would serve the health service uses and the other generator would serve the remaining proposed project uses. Emergency generators are regulated by the air district through their New Source Review (Regulation 2, Rule 5) permitting process. The project sponsor would be required to obtain applicable permits to operate an emergency generator from the air district. Although emergency generators are intended only to be used in periods of power outages, monthly testing of the generator would be required. The air district limits testing to no more than 50 hours per year. Additionally, as part of the permitting process, the air district would limit the excess cancer risk from any facility to no more than ten per one million population and requires any source that would result in an excess cancer risk greater than one per one million population to install best available control technology for toxics. The air district's best available control technology guideline for diesel backup engines greater than 1,000 brake-horsepower requires these engines to meet Tier 4 emissions standards.[90] Tier 4 emissions standards for generators of the size proposed reduce PM by 95 percent compared to Tier 1 emissions standards.[91] Compliance with the air district permitting process would ensure that the proposed project's backup emergency diesel generator emissions would not expose sensitive receptors to substantial air pollutant concentrations.

In summary, the proposed project would result in significant impacts related to emissions of construction-related toxic air contaminants that would expose sensitive receptors to substantial pollutant

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88 PM emissions benefits are estimated by comparing off-road PM emission standards for Tier 1 and Tier 2 with Tier 4 final emissions standards. Tier 1 PM emissions standards were established for equipment with 25- <50 horsepower and equipment with horsepower <175. Tier 1 emissions standards for these engines were compared against Tier 4 final emissions standards, resulting in a 96 percent reduction in PM. The United States Environmental Protection Agency established PM standards for engines with horsepower between 50-<175 as part of the Tier 2 emission standards. For these engines Tier 2 emissions standards were compared against Tier 4 final emissions standards, resulting in between 93-95 percent reduction in PM.

89 Bay Area Air Quality Management District, *Recommended Methods for Screening and Modeling Local Risks and Hazards,* pg. 12. May 2011. Available online at: https://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CEQA/BAAQMD%20Modeling%20Approach.ashx. Accessed February 2, 2021.

90 Bay Area Air Quality Management District, *BACT Determination for Diesel Back=Up Engines Greater than or equal to 1,000 Brake Horsepower.* December 2020.

91 PM emissions from Tier 1 generators greater in size than 1,200 horsepower were limited to 0.4 grams/break horsepower-hour (g/bhp-hr) and Tier 4 engines are limited to 0.02 g/bhp-hr.

concentrations. This impact would be reduced to less than significant with incorporation of Mitigation Measure M-AQ-4: Clean Off-Road Construction Equipment.

**Impact AQ-5: The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. (Less than Significant)**

Typical odor sources of concern include wastewater treatment plants, sanitary landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing facilities, fiberglass manufacturing facilities, auto body shops, rendering plants, and coffee roasting facilities. During construction, diesel exhaust from construction equipment would generate some odors. However, construction-related odors would be temporary and would not persist upon project completion. Observation indicates that the project site is not substantially affected by sources of odor. Additionally, the proposed project would consist of approximately 106,700 gsf of health service use, approximately 130,170 gsf of residential use (107 units), approximately 24,520 gsf of retail space, 4,340 gsf of restaurant space, and a 137,580 gsf subsurface garage. The proposed uses would not create a significant source of new odors. Therefore, the proposed project would not result in other emissions, such as odors, that could adversely affect a substantial number of people and this impact would be less than significant. No mitigation would be required.

## Cumulative Air Quality Impacts

**Impact C-AQ-1: The proposed project, in combination with cumulative projects, would contribute to cumulative air quality impacts. (Less than Significant with Mitigation)**

### CRITERIA AIR POLLUTANTS

As discussed above, regional air pollution is by its very nature largely a cumulative impact. Emissions from past, present, and future projects contribute to the region's adverse air quality on a cumulative basis. No single project by itself would be sufficient in size to result in regional nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulative adverse air quality impacts.[92] The project-level thresholds for criteria air pollutants are based on levels below which new sources are not anticipated to result in a considerable net increase in non-attainment criteria air pollutants. Therefore, because the proposed project's construction (Impact AQ-1) and operational (Impact AQ-3) emissions would not exceed the project-level thresholds for criteria air pollutants, the proposed project would not be considered to result in a cumulatively considerable contribution to regional air quality impacts. Cumulative criteria air pollutant impacts would be less than significant.

### LOCAL HEALTH RISKS

The proposed project and other cumulative projects in the vicinity as identified in Table 2, p. 26, and shown in Figure 18, p. 27, could result in cumulative emissions of toxic air contaminants, including diesel particulate matter emissions from new vehicle trips and other stationary emissions sources similar to the proposed project's diesel generator emissions, as well as diesel emissions from construction activities.

As described in Impact AQ-4, above, the proposed project's 3,503 average daily vehicle trips would be considered minor low-impact sources that do not pose a significant health impact even in combination with

[92] Bay Area Air Quality Management District, CEQA Air Quality Guidelines, May 2017, page 2-1.

other nearby sources. Additionally, stationary emissions sources are regulated by the air district through their New Source Review (Regulation 2, Rule 5) permitting process, which would ensure that toxic air contaminant emissions from stationary source emissions do not contribute considerably to cumulative health risk impacts. However, the project would involve construction activities that require off-road equipment that emit diesel particulate matter and other toxic air contaminants. Therefore, the proposed project's construction emissions would result in a considerable contribution to significant cumulative health risks. This would be a significant cumulative impact.

**MITIGATION MEASURE**

Implement **Mitigation Measure M-AQ-4 Clean Off-Road Construction Equipment**.

***Significance after Mitigation.*** The proposed project would be required to implement Mitigation Measure M-AQ-4, Clean Off-road Construction Equipment, which could reduce construction period emissions by as much as 96 percent. Implementation of this mitigation measure would reduce the project's contribution to cumulative air quality impacts to a less-than-significant level.

## 8. Greenhouse Gas Emissions

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project: | | | | | |
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | ☐ | ☐ | ☒ | ☐ | ☐ |
| b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | ☐ | ☐ | ☒ | ☐ | ☐ |

Greenhouse gas (GHG) emissions and global climate change represent cumulative impacts. GHG emissions cumulatively contribute to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature; instead, the combination of GHG emissions from past, present, and future projects have contributed and will continue to contribute to global climate change and its associated environmental impacts.

The Bay Area Air Quality Management District (air district) has prepared guidelines and methodologies for analyzing GHGs. These guidelines are consistent with CEQA Guidelines sections 15064.4 and 15183.5, which address the analysis and determination of significant impacts from a proposed project's GHG emissions. CEQA Guidelines section 15064.4 allows lead agencies to rely on a qualitative analysis to describe GHG emissions resulting from a project. CEQA Guidelines section 15183.5 allows for public agencies to analyze and mitigate GHG emissions as part of a larger plan for the reduction of GHGs and describes the required contents of such a plan. Accordingly, San Francisco has prepared Strategies to Address Greenhouse Gas

Emissions[93] which presents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco's qualified GHG reduction strategy in compliance with the CEQA Guidelines. These GHG reduction actions have resulted in a 35 percent reduction in GHG emissions in 2017 compared to 1990 levels,[94] exceeding the year 2020 reduction goals outlined in the air district's clean air plan, Executive Order S-3-05, and Assembly Bill 32 (also known as the Global Warming Solutions Act).[95]

Given that the city has met the state and region's 2020 GHG reduction targets and San Francisco's GHG reduction goals are consistent with, or more aggressive than, the long-term goals established under order S-3-05,[96] order B-30-15,[97,98] and Senate Bill 32[99,100] the city's GHG reduction goals are consistent with order S-3-05, order B-30-15, Assembly Bill 32, Senate Bill 32 and the 2017 clean air plan. Therefore, proposed projects that are consistent with the city's GHG reduction strategy would be consistent with the aforementioned GHG reduction goals, would not conflict with these plans or result in significant GHG emissions, and would therefore not exceed San Francisco's applicable GHG threshold of significance.

The following analysis of the proposed project's impact on climate change focuses on the project's contribution to cumulatively significant GHG emissions. Because no individual project could emit GHGs at a level that could result in a significant impact on the global climate, this analysis is in a cumulative context, and this section does not include an individual project-specific impact statement.

**Impact C-GG-1: The proposed project, in combination with cumulative projects, would generate greenhouse gas emissions, but not at levels that would result in a significant impact on the environment or conflict with any policy, plan, or regulation adopted for the purpose of reducing greenhouse gas emissions. (Less than Significant)**

Individual projects contribute to the cumulative effects of climate change by directly or indirectly emitting GHGs during construction and operational phases. Direct operational emissions include GHG emissions from new vehicle trips and area sources (natural gas combustion). Indirect emissions include emissions from

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93 San Francisco Planning Department, *Strategies to Address Greenhouse Gas Emissions in San Francisco,* July 2017. This document is available online at: https://sfplanning.org/project/greenhouse-gas-reduction-strategies#info, accessed September 2019.

94 San Francisco Department of the Environment, *San Francisco's Carbon Footprint.* Available at https://sfenvironment.org/carbon-footprint, accessed February 2021.

95 Executive Order S-3-05, Assembly Bill 32, and the air district's clean air plan (continuing the trajectory set in the 2010 Clean Air Plan) set a target of reducing GHG emissions to below 1990 levels by year 2020.

96 Office of the Governor, Executive Order S-3-05, June 1, 2005. Available at http://static1.squarespace.com/static/549885d4e4b0ba0bff5dc695/t/54d7f1e0e4b0f0798cee3010/1423438304744/California+Executive+Order+S-3-05+(June+2005).pdf . Executive Order S-3-05 sets forth a series of target dates by which statewide emissions of GHGs need to be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels (approximately 457 million metric tons of carbon dioxide equivalents (MTCO2E)); by 2020, reduce emissions to 1990 levels (approximately 427 million MTCO2E); and by 2050 reduce emissions to 80 percent below 1990 levels (approximately 85 million MTCO2E). Because of the differential heat absorption potential of various GHGs, GHG emissions are frequently measured in "carbon dioxide-equivalents," which present a weighted average based on each gas's heat absorption (or "global warming") potential.

97 Office of the Governor, *Executive Order B-30-15,* April 29, 2015. Available at https://www.gov.ca.gov/news.php?id=18938, accessed March 3, 2016. Executive Order B-30-15, issued on April 29, 2015, sets forth a target of reducing GHG emissions to 40 percent below 1990 levels by 2030 (estimated at 2.9 million $MTCO_2E$).

98 San Francisco's GHG reduction goals are codified in section 902 of the environment code and include: (i) by 2008, determine City GHG emissions for year 1990; (ii) by 2017, reduce GHG emissions by 25 percent below 1990 levels; (iii) by 2025, reduce GHG emissions by 40 percent below 1990 levels; and by 2050, reduce GHG emissions by 80 percent below 1990 levels.

99 Senate Bill 32 amends California Health and Safety Code Division 25.5 (also known as the California Global Warming Solutions Act of 2006) by adding section 38566, which directs that statewide greenhouse gas emissions to be reduced by 40 percent below 1990 levels by 2030.

100 Senate Bill 32 was paired with Assembly Bill 197, which would modify the structure of the State Air Resources Board; institute requirements for the disclosure of greenhouse gas emissions criteria pollutants, and toxic air contaminants; and establish requirements for the review and adoption of rules, regulations, and measures for the reduction of greenhouse gas emissions.

electricity providers; energy required to pump, treat, and convey water; and emissions associated with waste removal, disposal, and landfill operations.

The proposed project would increase the intensity of use of the site by constructing an approximately 438,180 gsf building, which would consist of approximately 106,700 gsf of health service use, approximately 130,170 gsf of residential use (107 units), approximately 24,520 gsf of retail space, 4,340 gsf of restaurant space, and a 137,580 gsf subsurface garage. Therefore, the proposed project would contribute to annual long-term increases in GHGs as a result of increased vehicle trips (mobile sources) and residential and commercial operations that result in an increase in energy use, water use, wastewater treatment, and solid waste disposal. Construction activities would also result in temporary increases in GHG emissions.

The proposed project would be subject to regulations adopted to reduce GHG emissions as identified in the GHG reduction strategy. As discussed below, compliance with the applicable regulations would reduce the project's GHG emissions related to transportation, energy use, waste disposal, wood burning, and use of refrigerants.

Compliance with the city's Commuter Benefits Ordinance, parking cash-out program, Transportation Sustainability Fee, Transportation Demand Management Program, Jobs-Housing Linkage Program, bicycle parking, showers, and lockers in new and expanded buildings, green building requirements for fuel-efficient vehicle and carpool parking, and car sharing requirements would reduce the proposed project's transportation-related emissions.[101] These regulations reduce GHG emissions from single-occupancy vehicles by promoting the use of alternative transportation modes with zero or lower GHG emissions on a per capita basis.

The proposed project would be required to comply with San Francisco green building requirements for energy efficiency, commissioning of building energy and water systems for new large commercial buildings, water use reduction, and renewable energy. The proposed project would comply with the San Francisco Better Roofs Ordinance (planning code section 149), which requires that 15 percent of the roof be "solar ready" or 30 percent of the roof be improved as a living roof (supporting growing plants). The proposed project would also comply with the San Francisco Stormwater Management Ordinance, San Francisco Water Efficient Irrigation Ordinance, and light pollution reduction requirements, and would be constructed with alternate water sources for non-potable applications, which would promote energy and water efficiency, thereby reducing the proposed project's energy-related GHG emissions.[102]

The proposed project's waste-related emissions would be reduced through compliance with the city's Mandatory Recycling and Compositing Ordinance, and construction and demolition debris recycling requirements. These regulations reduce the amount of materials sent to a landfill, reducing GHGs emitted by landfill operations. These regulations also promote reuse of materials, conserving their embodied energy[103] and reducing the energy required to produce new materials.

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101 Ibid.

102 Compliance with water conservation measures reduce the energy (and GHG emissions) required to convey, pump and treat water required for the project.

103 Embodied energy is the total energy required for the extraction, processing, manufacture and delivery of building materials to the building site.

Other regulations, including street tree planting requirements, and banning wood-burning devices, would reduce emissions of GHGs. Regulations requiring low-emitting finishes would reduce *volatile organic compounds*.[104] Thus, the proposed project was determined to be consistent with San Francisco's GHG reduction strategy.[105]

The project sponsor is required to comply with these regulations, which have proven effective as San Francisco's GHG emissions have measurably decreased when compared to 1990 emissions levels, demonstrating that the city has met and exceeded Executive Order S-3-05, Assembly Bill 32, and the clean air plan GHG reduction goals for the year 2020. Furthermore, the city has met its 2017 GHG reduction goal of reducing GHG emissions to 25 percent below 1990 levels by 2017. Other existing regulations, such as those implemented through Assembly Bill 32, will continue to reduce a proposed project's contribution to climate change. In addition, San Francisco's local GHG reduction targets are consistent with the long-term GHG reduction goals of Executive Order S-3-05, Executive Order B-30-15, Assembly Bill 32, Senate Bill 32 and the clean air plan. Therefore, because the proposed project is consistent with the city's GHG reduction strategy, it is also consistent with the GHG reduction goals of Executive Order S-3-05, Executive Order B-30-15, Assembly Bill 32, Senate Bill 32 and the clean air plan, would not conflict with these plans, and would therefore not exceed San Francisco's applicable GHG threshold of significance. As such, the proposed project would result in a less-than-significant impact with respect to GHG emissions and no mitigation would be required.

## 9. Wind

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project: | | | | | |
| a) Create wind hazards in publicly accessible areas of substantial pedestrian use? | ☐ | ☐ | ☒ | ☐ | ☐ |

**Impact WI-1: The proposed project would not create wind hazards in publicly accessible areas of substantial pedestrian use. (Less than Significant)**

In San Francisco, the CEQA significance threshold for determining if a project would result in a significant wind impact is the wind hazard criterion first established in planning code section 148: an equivalent wind speed of 26 miles per hour as averaged for a single full hour of the year.[106] This wind hazard criterion is also included in the Van Ness SUD in planning code section 243(c)(15). The planning department considers an exceedance of the wind hazard criterion to substantially affect the use of publicly accessible open spaces,

[104] While not a GHG, volatile organic compounds are precursor pollutants that form ground-level ozone. Increased ground-level ozone is an anticipated effect of future global warming that would result in added health effects locally. Reducing volatile organic compound emissions would reduce the anticipated local effects of global warming.

[105] San Francisco Planning Department, Greenhouse Gas Analysis: Compliance Checklist for 1200 Van Ness Avenue, October 19, 2020.

[106] The wind ordinance comfort criteria are defined in terms of equivalent wind speed, which is an average wind speed (mean velocity), adjusted to include the level of gustiness and turbulence. Equivalent wind speed is defined as the mean wind velocity, multiplied by the quantity (one plus three times the turbulence intensity) divided by 1.45. This calculation magnifies the reported wind speed when turbulence intensity is greater than 15 percent. Unless otherwise stated, use of the term "wind speeds" in connection with the wind-tunnel tests refers to equivalent wind speeds that are exceeded 10 percent of the time.

resulting in a significant wind impact. A significant wind impact would therefore result if individual buildings that could be developed would have exposure, orientation, or massing that would cause new exceedances (violations) of the hazard criterion of 26 mph for a single hour of the year.

The project site is located within the Van Ness SUD and therefore also subject to planning code section 243(c)(15). Section 243(c)(15) also provides criteria for wind comfort: buildings must be shaped so as not to cause ground-level wind currents to exceed, more than 10 percent of the time, 11 mph in substantial pedestrian use areas, and 7 mph in public seating areas. The planning code comfort criteria are also defined in terms of equivalent wind speed, which is an average wind speed (mean velocity), adjusted to include the level of gustiness and turbulence. However, a project that would cause exceedances of the wind comfort criteria, but not the wind hazard criterion, would not be considered to have a significant impact. Therefore, exceedances of the wind comfort criterion are presented for informational purposes, and to demonstrate compliance with other planning code requirements.

Average wind speeds in San Francisco are the highest in the summer and lowest in winter. However, the strongest peak winds occur in winter. Throughout the year, the highest wind speeds occur in midafternoon and the lowest in the early morning. West-northwest, west, northwest, and west-southwest are the most frequent and strongest of primary wind directions during all seasons (referred to as prevailing winds).

Tall buildings and exposed structures can strongly affect the wind environment for pedestrians. A building that stands alone or is much taller than the surrounding buildings can intercept and redirect winds that might otherwise flow overhead and bring them down the vertical face of the building to ground level, where they create ground-level wind and turbulence. These redirected winds can be relatively strong, turbulent, and incompatible with the intended uses of nearby ground-level spaces. A building with a height that is similar to the heights of surrounding buildings typically would cause little or no additional ground-level wind acceleration and turbulence. Thus, wind impacts are generally caused by large building masses extending substantially above their surroundings, and by buildings oriented such that a large wall catches a prevailing wind, particularly if such a wall includes little or no articulation. In general, new buildings less than approximately 80 feet in height are unlikely to result in substantial adverse effects on ground-level winds such that pedestrians would be uncomfortable. Such winds may exist under existing conditions, but shorter buildings typically do not cause substantial changes in ground-level winds.

The proposed project would result in the demolition of an existing five-story (approximately 53-foot-tall) building and construction of an approximately 13-story, 130-foot-tall building (excluding approximately 16 feet of rooftop appurtenances). Therefore, a *pedestrian wind study* ("wind study") was prepared for the proposed project by a qualified wind consultant.[107] The purpose of the wind study was to assess the wind environment around the project site in terms of pedestrian comfort and safety and, if necessary, to recommend changes to the project to reduce to the degree feasible exceedances of the one-hour wind hazard criterion.

The quantitative assessment was based on wind speed measurements on a scale model of the project and its surroundings in a boundary-layer wind tunnel. Existing, existing plus project, and project plus cumulative

[107] Rowan Williams Davis & Irwin Inc. (RWDI), 1200 Van Ness, San Francisco, CA, Pedestrian Wind Study, RWDI #2003725. February 22, 2021. The wind report modeled rooftop appurtenances to rise 13 feet 8 inches above the building; the elevator penthouse was subsequently revised to rise 16 feet above the building. This 2-foot, 4-inch discrepancy would be for an approximately 800square foot area of the building and would not change wind results to the extent that it would affect the conclusions of the wind report.

configurations were tested. As noted in the wind study, testing of the proposed project design for the existing plus project conditions revealed no exceedances of the wind hazard criterion. As such, the proposed project would have a less-than-significant impact related to wind hazards and no mitigation would be required.

The wind study determined that the proposed project's preliminary design would result in three new exceedances of the wind comfort criterion under existing plus project conditions. However, as described above, a project that would cause exceedances of the wind comfort criteria, but not the wind hazard criterion, would not be considered to have a significant impact. Nevertheless, refinements to the proposed project massing are incorporated into the project design. These refinements would eliminate the existing plus project wind comfort criteria exceedances. Exceedances of the wind comfort criterion are described to demonstrate compliance with planning code requirements and do not represent a significant impact under CEQA.

**Impact C-WI-1: The proposed project, in combination with cumulative projects, would result in less-than-significant cumulative impacts on wind. (Less than Significant)**

The cumulative context for wind hazards is localized and limited to the immediate vicinity of the project site. Cumulative development in the project vicinity (within a 0.25-mile radius of the project site) includes the projects identified in Table 2, p. 26, and shown in Figure 18, p. 27. The cumulative development projects in Table 2 consist of seven new buildings ranging in height from approximately 49 to 150 feet.[108] Cumulative projects within the vicinity that would be over 80 feet in height, of which there are five listed in Table 2 and shown in Figure 18, could combine with the proposed project to result in new exceedances of the wind hazard and wind comfort criteria. These cumulative projects include the proposed 150-foot-tall building at 1101-1123 Sutter Street, the 130-foot-tall building at 921 O'Farrell Street, the 80-foot-tall building at 1567 California Street, the 85-foot-tall building at 1033 Polk Street, and the 80-foot-tall building at 955 Post Street.[109] The wind study included an analysis of cumulative plus project conditions, and testing of the proposed project design revealed that there would be no exceedances in the wind hazard criterion under cumulative plus project conditions. Therefore, the proposed project, in combination with cumulative projects, would have a less-than-significant impact related to cumulative wind hazards and no mitigation would be required.

In addition, the wind study determined that that there would be two new exceedances of the wind comfort criterion under cumulative plus project conditions. These exceedances would occur at the project site frontage on Van Ness Avenue, near the proposed project building entrance, and on Post Street, south of the site. These locations are generally used by pedestrians in a transitory fashion, and do not contain

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[108] It should be noted that the currently under construction 1001 Van Ness Avenue Project, which would be a 13-story, 127-foot-tall building, was not included as part of the existing setting or as a cumulative project. However, this building is not within the immediate surroundings of the proposed project and, based on the wind tunnel results and evaluation of the surroundings, it was determined that the addition of this cumulative project would not cause any substantial changes in the wind conditions predicted in the wind study.

[109] For purposes of the wind study, the currently under construction, approximately 88-foot-tall building at 1523 Franklin Street is considered in the cumulative analysis, and not in the existing condition. The City normally considers under construction projects to be part of existing conditions; therefore, this project is not considered in the cumulative analysis of any of the other environmental resource topics in this Initial Study. Similarly, the wind study assumed that the completed and operational 131-foot-tall building at 990 Polk Street is part of the cumulative condition, while the cumulative analyses for all other topics considered in this Initial Study assume that this existing building is part of the existing condition. Neither of these buildings are tall enough and/or close enough to the project site or located in an area of strong winds, such that the outcome of the wind analysis would substantially change had these projects been included in the existing rather than cumulative analysis.

permanent seating areas, or other features that characterize locations where pedestrians would remain stationary for longer periods of time. Exceedances of the wind comfort criterion are described to demonstrate compliance with planning code requirements and do not represent a significant impact under CEQA.

## 10. Shadow

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project: | | | | | |
| a) Create new shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces? | ☐ | ☐ | ☒ | ☐ | ☐ |

**Impact SH-1: The proposed project would not create new shadow that substantially and adversely affects the use and enjoyment of publicly accessible open space. (Less than Significant)**

In 1984, San Francisco voters approved an initiative known as "Proposition K, The Sunlight Ordinance," which was codified as planning code section 295 in 1985. Planning code section 295 generally prohibits new structures above 40 feet in height that would cast additional shadows on open space that is under the jurisdiction of the San Francisco Recreation and Park Commission between one hour after sunrise and one hour before sunset, at any time of the year, unless that shadow would not result in a significant adverse effect on the use of the open space. Public open spaces that are not under the jurisdiction of the recreation and park commission as well as private open spaces are not subject to planning code section 295.

The nearest public open space to the project site is Sergeant John Macaulay Park, located at the northwest corner of the intersection of Larkin Street and O'Farrell Street, approximately 0.25 mile southeast of the project site. The proposed project would include a building greater than 40 feet in height; therefore, the planning department prepared a preliminary shadow fan to determine whether the project would have the potential to cast new shadow on nearby parks.[110] The shadow fan, which evaluated a building at both 130 and 144 feet in height, indicated that the proposed project would not cast any new shadows on Sergeant John Macaulay Park or any public open space.

The proposed project would cast new shadow on sidewalks in the vicinity of the project site, but new shadow coverage would be generally transitory in nature and would not substantially affect the function of sidewalks (which – in the vicinity of the site – are used primarily as pedestrian walkways and not as places for extended periods of stationary activity). In addition, this new shadow would be in an area of the city and the Van Ness Avenue corridor where height districts are generally at 130 feet or above, and new shadow

[110] San Francisco Planning Department, Preliminary Shadow Fan Analysis: 1200 Van Ness Avenue, May 7, 2020. Although the shadow fan was conducted at a maximum height of 144 feet and subsequent revisions to the project indicate the elevator penthouse would result in a maximum height of 146 feet, this 2-foot increase in height for an approximately 800-square-foot area would not result in substantial additional shadow not captured by the shadow fan.

would not be above levels that are common for San Francisco's urban environment. Therefore, this impact would be less than significant and no mitigation would be required.

**Impact C-SH-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative shadow impacts. (Less than Significant)**

As discussed above, the proposed project would not cast any new shadows onto public open spaces. Therefore, the proposed project would not have the potential to combine with cumulative development projects to create or contribute to a cumulative shadow impact on public open spaces. Cumulative projects identified in Table 2, p. 26, and shown in Figure 18, p. 27, would cast new shadow onto surrounding sidewalks and streets in the project vicinity. However, none of these cumulative development project's shadow would combine with the shadows cast by the proposed project to result in significant cumulative shadow impacts. The nearest cumulative project, at 1142 Van Ness Avenue, is a conversion of an existing structure that would not increase the building height. The next closest cumulative projects are at 1033 Polk Street, which would result in the construction of an 85-foot-tall building, and 1101-1123 Sutter Street, which would result in the construction of a 150-foot-tall building. While these cumulative projects would cast new shadows onto sidewalks and streets in the area, shadow from the proposed project and these cumulative projects would not be above levels common for San Francisco's urban environment. Therefore, this impact would be less than significant and no mitigation would be required.

## 11. Recreation

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project: | | | | | |
| a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated? | ☐ | ☐ | ☒ | ☐ | ☐ |
| b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment? | ☐ | ☐ | ☒ | ☐ | ☐ |

**Impact RE-1: The proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated or the construction of new facilities would be required. (Less than Significant)**

As described in Section E.2, Population and Housing, implementation of the proposed project would add approximately 251 residents and 387 employees to the project site. This would represent an approximately 6.3 percent increase over the existing population of 3,993 in census tract 120.00.

In accordance with the San Francisco Planning Code, the proposed project would provide a total of approximately 10,470 gsf of useable open space, which would consist of both private and common open

space that would be available to building residents only. Additionally, the proposed project would include approximately 1,000 gsf of indoor residential amenity space on the sixth floor podium level. Residents generated by the project would use the common open space areas provided by the project.

The new residents and employees of the proposed project would be served by the San Francisco Recreation and Parks Department, which administers more than 220 parks, playgrounds, and open spaces throughout the city, as well as recreational facilities including recreation centers, swimming pools, golf courses, and athletic fields, tennis courts, and basketball courts.[111] In 2003, voters passed Proposition C, which mandated the evaluation of park maintenance at city parks. The recreation and parks department conducts quarterly maintenance evaluations at each city park to identify and address maintenance standards and schedules to improve park conditions and allocate resources as necessary. In addition, the 2014 Recreation and Open Space Element of the San Francisco General Plan identified areas of "high-need," which are given highest priority for the construction of new parks and recreation improvements.[112] The project site is located within a medium-need area, but is located within proximate distance to some lower-need areas.

The neighborhood parks and other recreational facilities closest to the project site are the 0.2-acre Sgt. John Macaulay Park approximately 0.25 mile to the southeast, the 5.6-acre Jefferson Square Park approximately 0.5 miles southwest, and the approximately 11.5-acre Lafayette Park approximately 0.5 miles northwest. In addition, Fort Mason, which is located approximately 2 miles to the north, would be easily accessible via public transit (i.e., Van Ness BRT). These parks would likely experience increased use by employees and residents at the project site. However, the proposed project is unlikely to result in a substantial increased use of existing regional and neighborhood parks or other recreational facilities within the project vicinity such that physical deterioration would be expected to occur. The proposed project would also not require the construction or expansion of recreational facilities. The increase in recreational facility use as a result of the proposed project would be negligible; therefore, proposed project's impacts on recreational facilities would be less than significant and no mitigation would be required.

**Impact C-RE-1: The proposed project, in combination with cumulative projects, would result in less-than-significant impacts on recreational resources. (Less than Significant)**

Cumulative development in the project vicinity, as identified in Table 2, p. 26, and shown in Figure 18, p. 27, would result in an intensification of land uses and a cumulative increase in the demand for recreational facilities and resources. The city has accounted for such growth as part of the recreation and open space element of the general plan. In addition, San Francisco voters passed three bond measures, in 2008, 2012, and 2020, to fund the acquisition, planning, and renovation of the city's network of recreational resources. As discussed above, there are numerous neighborhood parks located within several blocks of the project site. It is expected that these existing recreational facilities would be able to accommodate the increase in demand for recreational resources generated by nearby cumulative development projects. For these reasons, the proposed project would not combine with cumulative projects in the project vicinity to create a significant cumulative impact on recreational facilities or resources. Therefore, this impact would be less than significant and no mitigation would be required.

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111 San Francisco Recreation and Parks Department. Available online at: sfrecpark.org. Accessed November 2020.

112 San Francisco Planning Department, San Francisco General Plan, Recreation and Open Space Element, April 2014. Available online at: http://openspace.sfplanning.org/, accessed November 2020.

## 12. Utilities and Service Systems

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project: | | | | | |
| a) Require or result in the relocation or construction of new or expanded, water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | ☐ | ☐ | ☒ | ☐ | ☐ |
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years? | ☐ | ☐ | ☒ | ☐ | ☐ |
| c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | ☐ | ☐ | ☒ | ☐ | ☐ |
| d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? | ☐ | ☐ | ☒ | ☐ | ☐ |
| e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | ☐ | ☐ | ☒ | ☐ | ☐ |

The project site is located within an urban area that is served by water storage, treatment, and distribution facilities; combined wastewater and stormwater collection, storage, treatment, and disposal facilities; electric power, natural gas, and telecommunication facilities; and solid waste collection and disposal service systems.

**Impact UT-1: The proposed project would not require or result in the relocation or construction of new or expanded, water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, nor would it result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments. (Less than Significant)**

The project site is served by San Francisco's combined sewer system, which collects and treats most of the wastewater and stormwater at one of the three San Francisco Public Utilities Commission (public utilities commission) treatment facilities. Wastewater and stormwater generated by the project would be treated at

the Southeast Water Pollution Control Plant, which currently treats 60 million gallons of wastewater per day (mgd) and has the capacity to treat up to 250 mgd during a rainstorm.[113]

As described in Impact PH-1 in Section E.2, Population and Housing, the project would add approximately 251 residents and 387 new employees to the project site. Implementation of the proposed project would therefore increase wastewater flows from the project site. The proposed project would incorporate water-efficient fixtures, as required by Title 24 of the California Code of Regulations and the San Francisco Green Building Ordinance. Compliance with these regulations would reduce wastewater flows and the amount of potable water used for building functions. The public utilities commission's infrastructure capacity plans account for projected population and employment growth. The incorporation of water-efficient fixtures into new development is also accounted for by the public utilities commission, because widespread adoption can lead to more efficient use of existing capacity. For these reasons, the population increase associated with the proposed project would not require the construction of new or expansion of existing wastewater treatment facilities.

The project site has been completely developed since at least 1911 and does not contain any pervious surfaces. Therefore, implementation of the proposed project would not result in an increase in impervious surfaces. The city's Stormwater Management Ordinance (Ordinance No. 83-10, effective May 22, 2010) requires the proposed project to maintain, reduce, or eliminate the existing volume and rate of stormwater runoff discharged from the project site. In addition, for projects replacing 5,000 square feet or more of impervious surface, stormwater flows are required to be reduced by 25 percent over existing conditions. To achieve these objectives, the proposed project would be required to implement and install appropriate stormwater management systems that retain runoff on site, promote stormwater reuse, and limit (or eliminate altogether) site discharges from entering the city's combined stormwater/sewer system. This, in turn, would limit the incremental demand on both the collection system and wastewater facilities resulting from stormwater discharges.

As discussed in more detail in Impact UT-2, the proposed project would result in an incremental increase in the demand for new water supplies, but would not itself result in the need for the construction of new or expanded water treatment facilities or delivery infrastructure.

The project would result in an incremental increase in the demand for electricity, natural gas, and telecommunications, which is not in excess of amounts expected and provided for in the project area by utility service providers.

For these reasons, the utilities demand associated with the proposed project would not exceed the service capacity of the existing providers and would not require the construction of new facilities or expansion of existing facilities. Therefore, this impact would be less than significant and no mitigation would be required.

**Impact UT-2: Sufficient water supplies are available to serve the proposed project and reasonably foreseeable future development in normal, dry, and multiple dry years unless the Bay Delta Plan Amendment is implemented; in that event the public utilities commission may develop new or expanded water supply facilities to address shortfalls in single and multiple dry years, but this would occur with or without the proposed project. Impacts**

[113] San Francisco Public Utilities Commission, SFPUC Sewer System Improvement Program. Available online at: https://sfwater.org/modules/showdocument.aspx?documentid=5801., 2014, accessed December 2020.

**related to new or expanded water supply facilities cannot be identified at this time or implemented in the near term; instead, the public utilities commission would address supply shortfalls through increased rationing, which could result in significant cumulative effects, but the project would not make a considerable contribution to impacts from increased rationing. (Less than Significant)**

The public utilities commission adopted the 2015 Urban Water Management Plan for the City and County of San Francisco.[114] The plan estimates that current and projected water supplies will be sufficient to meet future retail demand through 2035 under normal year, single dry-year and multiple dry-year conditions; however, if a multiple dry-year event occurs, the public utilities commission would implement water use and supply reductions through its drought response plan and a corresponding retail water shortage allocation plan.

In December 2018, the State Water Resources Control Board adopted amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary, which establishes water quality objectives to maintain the health of our rivers and the Bay-Delta ecosystem (the Bay-Delta Plan Amendment). The state water board has stated that it intends to implement the Bay-Delta Plan Amendment by the year 2022, assuming all required approvals are obtained by that time. Implementation of the Bay-Delta Plan Amendment would result in a substantial reduction in the public utilities commission's water supplies from the Tuolumne River watershed during dry years, requiring rationing to a greater degree in San Francisco than previously anticipated to address supply shortages not accounted for in the 2015 Urban Water Management Plan.

The public utilities commission has prepared a memorandum discussing future water supply scenarios given adoption of the Bay-Delta Plan Amendment.[115] As discussed in the memorandum, implementation of the plan amendment is uncertain for several reasons and whether, when, and the form in which the Bay-Delta Plan Amendment would be implemented, and how those amendments could affect the public utilities commission's water supply, is currently unknown. The memorandum estimates total shortfalls in water supply (that is, total retail demand minus total retail supply) to retail customers through 2040 under three increasingly supply-limited scenarios:

1. Without implementation of the Bay-Delta Plan Amendment wherein the water supply and demand assumptions contained in the 2015 Urban Water Management Plan and the 2009 Water Supply Agreement as amended would remain applicable.

2. With implementation of a voluntary agreement between the public utilities commission and the State Water Resources Control Board that would include a combination of flow and non-flow measures that are designed to benefit fisheries at a lower water cost, particularly during multiple dry years, than would occur under the Bay-Delta Plan Amendment).

3. With implementation of the Bay-Delta Plan Amendment as adopted.

As estimated in the public utilities commission memorandum, water supply shortfalls during dry years would be lowest without implementation and highest with implementation of the Bay-Delta Plan

[114] San Francisco Public Utilities Commission, *2015 Urban Water Management Plan for the City and County of San Francisco,* June 2016.
[115] San Francisco Public Utilities Commission, *2018 Bay-Delta Plan Amendment Voluntary Agreement Excerpt*, August 2020.

Amendment. Shortfalls under the proposed voluntary agreement would be between those with and without implementation of the Bay-Delta Plan Amendment.

Under these three scenarios, the public utilities commission would have adequate water to meet total retail demands through 2040 in normal years. For single dry and multiple (years 1, 2, and 3) dry years of an extended drought, the public utilities commission memorandum estimates that shortfalls of water supply relative to demand would occur both with and without implementation of the Bay-Delta Plan Amendment. Without implementation of the plan amendment, shortfalls would range from approximately 3.6 to 6.1 mgd or 5 to 6.8 percent shortfall during dry years through the year 2040.

With implementation of the Bay-Delta Plan Amendment, shortfalls would range from 12.3 mgd (15.6 percent) in a single dry year to 36.1 mgd (45.7 percent) in years seven and eight of the 8.5-year design drought based on 2025 demand levels and from 21 mgd (23.4 percent) in a single dry year to 44.8 mgd (49.8 percent) in years seven and eight of the 8.5-year design drought based on 2040 demand.

The proposed project does not require a water supply assessment under the California Water Code. Under sections 10910 through 10915 of the California Water Code, urban water suppliers like the public utilities commission must prepare water supply assessments for certain large "water demand" projects, as defined in CEQA Guidelines section 15155. The proposed would include approximately 106,700 gsf of health service space, 107 residential units, 24,520 gsf of retail space, and 4,340 gsf of restaurant space; as such it does not qualify as a "water-demand" project as defined by CEQA Guidelines section 15155(a)(1) and a water supply assessment is not required and has not been prepared for the project.

While a water supply assessment is not required, the following discussion provides an estimate of the project's maximum water demand in relation to the three supply scenarios. No single development project alone in San Francisco would require the development of new or expanded water supply facilities or require the public utilities commission to take other actions, such as imposing a higher level of rationing across the city in the event of a supply shortage in dry years. Therefore, a separate project-only analysis is not provided for this topic. The following analysis instead considers whether the proposed project in combination with both existing development and projected growth through 2040 would require new or expanded water supply facilities, the construction or relocation of which could have significant cumulative impacts on the environment. It also considers whether a high level of rationing would be required that could have significant cumulative impacts. It is only under this cumulative context that development in San Francisco could have the potential to require new or expanded water supply facilities or require the public utilities commission to take other actions, which in turn could result in significant physical environmental impacts related to water supply. If significant cumulative impacts could result, then the analysis considers whether the project would make a considerable contribution to the cumulative impact.

Based on guidance from the California Department of Water Resources and a citywide demand analysis, the public utilities commission has established 50,000 gallons per day as an equivalent project demand for projects that do not meet the definitions provided in CEQA Guidelines section 15155(a)(1). The development proposed by the project (106,700 gsf of health service space, 107 new residential units, 24,520 square feet of retail space, and 4,340 gsf of restaurant space) would represent approximately 22 percent of the 500-unit limit and approximately 27 percent of the 500,000 square feet of commercial space provided in section 15155(1)(A) and (B), respectively. In addition, the proposed project would incorporate water-efficient fixtures as required by Title 24 of the California Code of Regulations and the city's Green Building Ordinance.

It is therefore reasonable to assume that the proposed project would result in an average daily demand of less than 50,000 gallons per day of water.

The public utilities commission has prepared estimates of total retail demand in five-year intervals from 2020 through 2040. Assuming the project would demand no more than 50,000 gallons of water per day (or 0.05 mgd), **Table 19, Proposed Project Water Demand Relative to Total Retail Demand**, compares this maximum with the total retail demand from 2020 through 2040. At most, the proposed project's water demand would represent a small fraction of the total projected retail water demand, ranging from 0.07 to 0.06 percent between 2020 and 2040. As such, the project's water demand is not substantial enough to require or result in the relocation or construction of new or expanded water facilities the construction or relocation of which could cause significant environmental effects.

**Table 19: Proposed Project Water Demand Relative to Total Retail Demand (mgd)**

| | 2020 | 2025 | 2030 | 2035 | 2040 |
|---|---|---|---|---|---|
| Total Retail Demand | 72.1 | 79 | 82.3 | 85.9 | 89.9 |
| Total Demand of Proposed Project | 0.05 | 0.05 | 0.05 | 0.05 | 0.05 |
| Total Demand of Proposed Project as Percentage of Total Retail Demand | 0.07% | 0.06% | 0.06% | 0.06% | 0.06% |

Source: Technical Memorandum to Lisa Gibson, Environmental Review Officer, San Francisco Planning Department – Environmental Planning Division, *Maximum water demand for smaller projects and potential water supply scenarios* (San Francisco Public Utilities Commission, May 2019).

Sufficient water supplies are available to serve the proposed project and reasonably foreseeable future development in normal, dry, and multiple dry years unless the Bay-Delta Plan Amendment is implemented. As indicated above, the proposed project's maximum demand would represent less than 0.06 percent of the total retail demand in 2040 when implementation of the Bay-Delta Plan Amendment would result in a retail supply shortfall of up to 49.8 percent in a multi-year drought. The public utilities commission has indicated that it is accelerating its efforts to develop additional water supplies and explore other projects that would increase overall water supply resilience in the case that the Bay-Delta Plan Amendment is implemented. The public utilities commission has identified possible projects that it will study, but it has not determined the feasibility of the possible projects, has not made any decision to pursue any particular supply projects, and has determined that the identified potential projects would take anywhere from 10 to 30 years or more to implement. The potential impacts that could result from the construction and/or operation of any such water supply facility projects cannot be identified at this time. In any event, under such a worst-case scenario, the demand for the public utilities commission to develop new or expanded dry-year water supplies would exist regardless of whether the proposed project is constructed.

Given the long lead times associated with developing additional water supplies, in the event the Bay-Delta Plan Amendment were to take effect sometime after 2022 and result in a dry-year shortfall, the expected action of the public utilities commission for the next 10 to 30 years (or more) would be limited to requiring increased rationing. As discussed in the public utilities commission memorandum, the public utilities commission has established a process through its Retail Water Shortage Allocation Plan for actions it would take under circumstances requiring rationing. The level of rationing that would be required of the proposed project is unknown at this time. Both direct and indirect environmental impacts could result from high levels of rationing. However, the small increase in potable water demand attributable to the project compared to citywide demand would not substantially affect the levels of dry-year rationing that would otherwise be

required throughout the city. Therefore, the proposed project would not make a considerable contribution to a cumulative environmental impact caused by implementation of the Bay-Delta Plan Amendment.

**Impact UT-3: The proposed project would not generate solid waste in excess of state or local standards, would not impair the attainment of solid waste reduction goals, and would comply with statutes, regulations, and reduction goals concerning solid waste. (Less than Significant)**

In September 2015, the city entered into a landfill disposal agreement with Recology, Inc. for disposal of all solid waste collected in San Francisco, at the Recology Hay Road Landfill in Solano County, through September 2024 or until 3.4 million tons have been disposed, whichever occurs first. The city would have an option to renew the agreement for a period of six years or until an additional 1.6 million tons have been disposed, whichever occurs first.[116] The Recology Hay Road Landfill is permitted to accept up to 2,400 tons per day of solid waste. At that maximum permitted rate, the landfill has the capacity to accommodate solid waste until approximately 2034. Under existing conditions, the landfill receives an average of approximately 1,850 tons per day from all sources, with approximately 1,200 tons per day from San Francisco, which includes residential and commercial waste and demolition and construction debris that cannot be reused or recycled[117] (see discussion below). At the current rate of disposal, the landfill has operating capacity until 2041. The city's contract with the Recology Hay Road Landfill will extend until 2031 or when the city has disposed 5 million tons of solid waste, whichever occurs first. At that point, the city would either further extend the landfill contract or find and entitle an alternative landfill site.

The project's population is part of the population growth taken into account in the San Francisco General Plan 2014 Housing Element Update, as discussed under Section E.2, Population and Housing, and therefore can be assumed to have been taken into account in waste management planning. San Francisco set a goal of 75 percent solid waste diversion by 2010, which it exceeded at 80 percent diversion.[118] The current goal, set in 2018, is to reduce total waste generation by 15 percent and disposal to landfill by 50 percent before 2030.[119] San Francisco Ordinance No. 27-06 requires mixed construction and demolition debris to be transported by a Registered Transporter and taken to a Registered Facility that must recover for reuse or recycling and divert from landfill at least 65 percent of all received construction and demolition debris. San Francisco's Mandatory Recycling and Composting Ordinance No. 100-09 requires all properties and persons in the city to separate their recyclables, compostables, and landfill trash.

The proposed project would incrementally increase total city waste generation; however, the proposed project would be required to comply with San Francisco Ordinance Nos. 27-06 and 100-09. Due to the existing and anticipated increase of solid waste recycling in the city and the agreement with Recology for disposal of solid waste at the Hay Road Landfill, any increase in solid waste resulting from the proposed

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116 San Francisco Planning Department, Agreement for Disposal of San Francisco Municipal Solid Waste at Recology Hay Road Landfill in Solano County, Final Negative Declaration, Planning Department Case No. 2014.0653, May 21, 2015, http://sfmea.sfplanning.org/2014.0653E_Revised_FND.pdf, accessed December 2020.

117 CalRecycle, 2010, Jurisdiction diversion/disposal rate detail. http://www.calrecycle.ca.gov/LGCentral/reports/diversionprogram/JurisdictionDiversionDetail.aspx?JurisdictionID=438&Year=2010, accessed December 2020.

118 San Francisco Department of the Environment, San Francisco Ordinance No. 27-06, July 1, 2006, https://sfenvironment.org/sites/default/files/fliers/files/cd_ordinance.pdf, accessed April 2021.

119 San Francisco Department of the Environment, Zero Waste – Frequently Asked Questions, https://sfenvironment.org/zero-waste-faqs, accessed April 2021.

project would be accommodated by the existing landfill. Thus, the proposed project would have less-than-significant impacts related to solid waste and no mitigation would be required.

**Impact C-UT-1: The proposed project, in combination with cumulative projects, would not result in a cumulative impact on utilities and service systems. (Less than Significant)**

**WASTEWATER AND STORMWATER**

The geographic context for cumulative wastewater and stormwater impacts is the Southeast Water Pollution Control Plant drainage basin. The city's combined sewer system and treatment facilities are designed to accept both wastewater and stormwater flows. As with the proposed project, all reasonably foreseeable projects in the drainage basin would be required to comply with San Francisco regulations regarding wastewater and stormwater generation. Although cumulative projects would likely result in increased wastewater flows, regulations require that, for projects replacing 5,000 square feet or more of impervious surface, stormwater flows be reduced by 25 percent over existing conditions. The 25 percent reduction in stormwater flows would result in an overall reduction in combined flows during peak wet-weather flow events. Therefore, the proposed project, in combination with cumulative projects, would have a less-than-significant cumulative impact on the combined sewer collection and treatment system.

**WATER**

As discussed in Impact UT-2, no single development project alone in San Francisco would require the development of new or expanded water supply facilities. The analysis provided in Impact UT-2 considers whether the proposed project, in combination with both existing development and projected growth through 2040, would require new or expanded water supply facilities, the construction or relocation of which could have significant cumulative impacts on the environment. Therefore, no separate cumulative analysis is required.

**SOLID WASTE**

The geographic context for cumulative solid waste impacts is the city. Long-range growth forecasts are considered in planning for future landfill capacity. In addition, the city currently exceeds statewide goals for reducing solid waste and is therefore expected to reduce solid waste volumes in the future. All projects are required to comply with San Francisco's construction and demolition debris recovery and recycling and composting ordinances. As with the proposed project, cumulative projects' compliance with these ordinances would reduce the solid waste generation from construction and operation of cumulative development projects.

Although cumulative development projects could incrementally increase total waste generation from the city by increasing the number of residents and excavation, demolition, and remodeling activities associated with growth, the increasing rate of landfill diversion citywide through recycling, composting, and other methods would result in a decrease of total waste that requires deposition into the landfill. Given the city's progress to date on diversion and waste reduction, and given the future long-term capacity available at the Recology Hay Road Landfill and other area landfills, reasonably foreseeable development projects would be served by a landfill with sufficient permitted capacity to accommodate their solid waste disposal needs. For these reasons, the proposed project, in combination with cumulative projects, would have less-than-significant cumulative impacts related to solid waste.

**CONCLUSION**

Based on the above, the proposed project would not combine with cumulative projects to create a significant cumulative impact on utilities and service systems, and this impact would be less than significant. No mitigation would be required.

## 13. Public Services

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project: | | | | | |
| a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services such as fire protection, police protection, schools, parks, or other public facilities? | ☐ | ☐ | ☒ | ☐ | ☐ |

The project's impacts to parks are discussed in Section E.11, Recreation. Impacts to other public services are discussed below. As discussed in Section E.2, Population and Housing, the proposed project would add approximately 251 residents and 387 employees on the project site, which could increase the demand for public services, as further discussed below.

**Impact PS-1: The proposed project would increase demand for police protection, fire protection services, and other government services, but not to an extent that would require new or physically altered government facilities, the construction of which would cause significant environmental impacts. (Less than Significant)**

**FIRE PROTECTION AND MEDICAL EMERGENCY SERVICE**

The San Francisco Fire Department provides fire suppression and emergency medical services in the city, including the project site. In addition, several privately operated ambulance companies are authorized to provide advanced life support services. The fire department responds to non-life-threatening fire and medical emergencies (Code 2) as well as life-threatening fire and medical emergencies (Code 3). Response times are measured from the time a unit is dispatched to the time the unit arrives at the scene. According to San Francisco's Emergency Medical Services Agency policy, the target response time for a life-threatening emergency medical incident should be within 10 minutes 90 percent of the time.[120] In fiscal year 2018-2019,

[120] City and County of San Francisco, Mayor's 2020-2021 & 2021-2022 Proposed Budget, Fire Department, Available online at https://sfmayor.org/sites/default/files/CSF_Proposed_Budget_Book_July_2020_LR_Web_REV2.pdf. Accessed November 2020.

91 percent of ambulances arrived on scene within 10 minutes. The fire department is on track to meet its target in fiscal year 2019-2020 as well.[121]

The fire department consists of three divisions, which are subdivided into 10 battalions and 45 active stations throughout the city. The project site would be served by Fire Station No. 3, located at 1080 Post Street, less than 0.1 miles east of the project site.[122] The increased population resulting from the proposed project would be expected to increase demand for fire protection and emergency medical services. However, this increase in demand would not be substantial given the overall demand for such services on a citywide basis. Furthermore, the fire department conducts ongoing assessments of its service capacity and response times to maintain acceptable service levels, given the demand resulting from changes in population.

The proposed project would be required to comply with the applicable requirements of the California Fire Code, which includes requirements pertaining to fire protection systems, provision of state-mandated fire alarms, fire extinguishers, appropriate building access and egress, and emergency response notification systems. In addition, the proposed project would be required to comply with the California Fire Code requirements pertaining to high rise structures as well as approved water supply capable of supplying the required flow for fire protection. Moreover, the proximity of the project site to Fire Station No. 3 would help minimize fire department response times should incidents occur at the project site. As such, the proposed project would not require the construction of new, or alteration of existing fire protection facilities, the construction of which could cause significant environmental impacts. This impact would be less than significant and no mitigation would be required.

**POLICE PROTECTION SERVICES**

The San Francisco Police Department, headquartered at 850 Bryant Street in the Hall of Justice (approximately 1.6 miles southeast of the project site), provides police protection services for the city. The project site is located within the Northern District of the San Francisco Police Department, however the Tenderloin Station, located at 301 Eddy Street is the nearest police station located approximately 0.7 miles southeast of the project site.[123] The increased population resulting from the proposed project would be expected to increase demand for police protection services. The police department conducts ongoing assessments of its staffing and facility needs as part of the city's annual operating and capital budget process. The increase in demand resulting from the project would not be substantial given the overall demand for such services on a citywide basis. As such, the proposed project would not require the construction of new, or alteration of existing police protection facilities, the construction of which could cause significant environmental impacts. This impact would be less than significant, and no mitigation would be required.

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121 City and County of San Francisco, Ambulance Response to Life-Threatening Emergencies, 2020, Available online at: https://sfgov.org/scorecards/public-safety/ambulance-response-life-treatening-emergencies. Accessed November 2020.

122 San Francisco Fire Department, Fire Station Locations, https://sf-fire.org/sites/default/files/FileCenter/Documents/1975-Station%20Location%20Map%20-%20w%20FS51.pdf. Accessed November 2020.

123 San Francisco Police Department, Police District Maps, http://sanfranciscopolice.org/police-district-maps, accessed November 2020.

### SCHOOLS

The San Francisco Unified School District (school district) operates San Francisco's public schools. The school district manages 130 schools, and as of October 2019 had a total enrollment of 54,452 students.[124]

To analyze the demand on public schools resulting from implementation of the proposed project, estimates are made regarding the number of public school students that would be generated by the proposed project. In 2020, Lapkoff & Gobalet Demographic Research, Inc. updated a study to evaluate variations in public school student generation rates between different San Francisco developments.[125] The study noted that student attendance varies by housing types, and there are very few public school students in the large apartment and condominium complexes, even when the buildings contain some below-market-rate units. The public school student rate for 100 percent market-rate buildings is 0.01.[126]

Based on a public school student generation rate employed by the school district of 0.01 students per market-rate dwelling unit, the proposed project would generate one public school student. The school district has capacity accommodate the additional student generated by the proposed project. Therefore, implementation of the proposed project would not result in a substantial unmet demand for school facilities, and the proposed project would not require the construction of new, or alteration of existing school facilities, the construction of which could cause a significant environmental impact. This impact would be less than significant.

### OTHER PUBLIC SERVICES

The proposed project would also incrementally increase the demand for other governmental services and facilities, such as libraries. The San Francisco Public Library operates 27 branches throughout San Francisco, with the closest library (the Main Library branch) located approximately 0.7 miles south of the project site. The increased population resulting from the proposed project would be expected to increase demand on library services. However, in the context of overall citywide demand for library services, the population increase resulting from the proposed project would not be substantial. Therefore, implementation of the proposed project would not require the construction of new, or alteration of existing public facilities, the construction of which could cause significant environmental impacts, including library facilities. This impact would be less than significant and no mitigation would be required.

**Impact C-PS-1: The proposed project, in combination with cumulative projects, would not result in a cumulative impact on public services. (Less Than Significant)**

The geographic contexts for cumulative fire, police, and library impacts are the police, fire, and library service areas, while the geographic context for cumulative school impacts is the school district service area. The reasonably foreseeable future projects within 0.25 miles of the project site or, in the case of schools, within the school district, in combination with the proposed project, would increase the population in the area, leading to an increase in demand for public services, including fire and police protection, school services, and library services. These essential city service providers continually assess demand, based on anticipated growth and service needs. By analyzing their service metrics, these agencies and services are

[124] SFUSD Facts at a Glance, 2020. https://drive.google.com/file/d/1Pwkg7tRp6X8_BffhusGdzeZOTPAWijxW/view, accessed March 4,2021.

[125] Lapkoff & Gobalet Demographic Research, Inc., Demographic Analyses and Enrollment Forecasts for the San Francisco Unified School District, February 16, 2018, p. 2, https://archive.sfusd.edu/en/assets/sfusd-staff/about-SFUSD/files/demographic-analyses-enrollment-forecast.pdf. Accessed November 2020.

[126] Ibid.

able to adjust staffing, capacity, response times, and other measures of performance. As a result, the proposed project in combination with cumulative projects would not result in any service gap in fire, police, schools, or library services. Further, the school district works with the planning department and other city agencies to develop public school student enrollment projections and inform its facility planning. Should additional capacity be required to meet the updated educational space standards and projected public school student population, the school district could renovate and reconfigure existing school facilities and assets owned by the school district but not currently in school use, as necessary. Cumulative projects would also be required to contribute school fees, which would fund needed improvements in school services. Therefore, the proposed project would not combine with cumulative projects in the project vicinity to result in the need for the construction of new, or alteration of existing public services facilities, the construction of which could cause significant environmental impacts. Thus, cumulative public services impacts would be less than significant and no mitigation would be required.

## 14. Biological Resources

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project: | | | | | |
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | ☐ | ☐ | ☒ | ☐ | ☐ |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | ☐ | ☐ | ☐ | ☐ | ☒ |
| c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | ☐ | ☐ | ☐ | ☐ | ☒ |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | ☐ | ☐ | ☒ | ☐ | ☐ |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | ☐ | ☐ | ☒ | ☐ | ☐ |
| f) Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan? | ☐ | ☐ | ☐ | ☐ | ☒ |

The project site is currently built with a five-story approximately 190,650-square-foot building complex and is completely covered by impervious surfaces. The project site does not contain federally protected wetlands as defined by section 404 of the Clean Water Act, riparian habitat, or other sensitive natural communities. In addition, the project site is not located within an adopted habitat conservation plan, a natural community conservation plan, or other approved local, regional, or state habitat conservation plan areas. Therefore, topics E.14(b), E.14(c), and E.14(f) are not applicable to the proposed project.

**Impact BI-1: The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any special-status species and would not interfere with the movement of native resident or wildlife species or with established native resident or migratory wildlife corridors. (Less than Significant)**

The project site is covered entirely by impervious surfaces. A total of four street trees are currently located on the Van Ness Avenue frontage. Due to the developed nature of the project site and the surrounding area, the project site does not provide suitable habitat for any rare or endangered plant or wildlife species. The existing street trees along Van Ness Avenue could support habitat for migratory nesting birds protected under the California Fish and Game Code or the Migratory Bird Treaty Act. However, these trees would not be removed as a result of the proposed project and the project would not directly affect habitat for migratory nesting birds.

Structures in an urban setting may present risks for birds as they traverse their migratory paths due to building location and/or features. The city has adopted guidelines to address this issue and provided regulations for bird-safe design within the city.[127] Section 139, Standards for Bird-Safe Buildings, of the planning code establishes building design standards to reduce avian mortality rates associated with bird strikes. The building standards are based on two types of hazards: (1) location-related hazards which pertain to new buildings within 300 feet of an urban bird refuge, and (2) feature-related hazards such as free-standing glass walls, wind barriers, skywalks, balconies, and greenhouses on rooftops that have unbroken glazed segments 24 square feet or larger in size. Any project that contains building-feature hazards must apply bird-safe glazing treatments on 100 percent of the feature in compliance with section 139.

The project site is not located within 300 feet of an Urban Bird Refuge; therefore, the standards for location-related hazards would not apply.[128] The proposed project would be required to comply with the building feature-related hazard standards of planning code section 139 by using bird-safe glazing treatments on 100 percent of any building feature-related hazards such as free-standing glass walls, wind barriers, and balconies. Compliance with the city's bird-safe building standards would ensure the proposed project does not interfere with the movement of a native resident or wildlife species, or with an established native resident or migratory wildlife corridor.

[127] San Francisco Planning Department. Standards for Bird-Safe Buildings. Available http://default.sfplanning.org/publications_reports/bird_safe_bldgs/Standards%20for%20Bird%20Safe%20Buildings%20-%2011-30-11.pdf. Accessed November 2020.

[128] San Francisco Planning Department. 2014. Urban Bird Refuge Map. Available https://sfplanning.org/sites/default/files/resources/2018-08/Urban%20Bird%20Refuge.pdf. Accessed November 2020.

For the reasons stated above, the proposed project would result in less-than-significant impacts to special-status species and native resident, wildlife species, or migratory birds. No mitigation would be required.

**Impact BI-2: The proposed project would not conflict with the city's local tree ordinance. (Less than Significant)**

The city's Urban Forestry Ordinance, public works code section 801, et seq., requires a permit from public works to remove any protected trees.[129] The proposed project would retain the existing four trees along Van Ness Avenue and add 14 new street trees along the Post Street frontage. The project sponsor would be required to obtain a specific tree protection plan from an International Society of Arboriculture–certified arborist to protect the four adjacent trees during construction.[130] Therefore, the proposed project would not conflict with the city's local tree ordinance and this impact would be less than significant. No mitigation would be required.

**Impact C-BI-1: The proposed project, in combination with cumulative projects, would not result in a cumulative impact related to biological resources. (*Less than Significant*)**

The project site and the surrounding area do not currently support any candidate, sensitive, or special-status species, wetlands as defined by section 404 of the Clean Water Act, riparian habitat, or any other sensitive natural community identified in local or regional plans, policies, or regulations. Cumulative development projects identified in Table 2, p. 26, would also be subject to the requirements of the Migratory Bird Treaty Act, California Fish and Game Code, and the city's bird-safe building standards and Urban Forestry Ordinance. Therefore, the proposed project would not combine with cumulative development projects to result in a cumulative impact related to biological resources and cumulative impacts would be less than significant. No mitigation would be required.

## 15. Geology and Soils

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project: | | | | | |
| a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | | |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | ☐ | ☐ | ☒ | ☐ | ☐ |

[129] San Francisco Public Works Code. 1995. Article 16: Urban Forestry Ordinance. Available https://sfenvironment.org/sites/default/files/agenda/attach/public_works_code_groves_explanatory_documents_consolidated.pdf. Accessed November 2020.

[130] San Francisco Department of Building Inspection. 2008. The Tree Protection Legislation. https://sfdbi.org/ftp/uploadedfiles/dbi/Key_Information/TreeProtectionLegislation.pdf. Accessed November 2020.

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| ii) Strong seismic ground shaking? | ☐ | ☐ | ☒ | ☐ | ☐ |
| iii) Seismic-related ground failure, including liquefaction? | ☐ | ☐ | ☒ | ☐ | ☐ |
| iv) Landslides? | ☐ | ☐ | ☒ | ☐ | ☐ |
| b) Result in substantial soil erosion or the loss of topsoil? | ☐ | ☐ | ☒ | ☐ | ☐ |
| c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse? | ☐ | ☐ | ☒ | ☐ | ☐ |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? | ☐ | ☐ | ☒ | ☐ | ☐ |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water? | ☐ | ☐ | ☐ | ☐ | ☒ |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | ☐ | ☒ | ☐ | ☐ | ☐ |

The proposed project would connect to San Francisco's sewer and stormwater collection and treatment system. It would not use a septic water disposal system. Therefore, Topic E.15(e) is not applicable to the project.

This section describes the geology, soils, and seismicity characteristics of the project area as they relate to the proposed project, and relies on the information and findings provided in a *geotechnical investigation* that was conducted for the project site and proposed project.[131] The geotechnical investigation included field exploration and borings, a review of available geologic and geotechnical data for the site vicinity, an engineering analysis of the proposed project in the context of geologic and geotechnical site conditions, and project-specific design and construction recommendations.

The project site slopes upward from southeast to northwest from approximately 125 feet to 155 feet above mean sea level. The project site also slopes upward generally from south to north with a grade change of approximately 10 feet from Post Street to Hemlock Street. According to the geotechnical investigation, the project site is anticipated to be underlain by approximately 4 feet of fill consisting of loose to medium dense sand with varying amounts of gravel and brick debris. The fill is underlain by fine-grained dune sand that has

[131] Langan Engineering and Environmental Services, Inc., *Geotechnical Investigation, 1200 Van Ness Avenue, San Francisco, California*, August 6, 2020.

a loose to medium density that extend approximately 36 to 47 feet bgs. The dune sand is underlain by the Colma formation, which consists of dense to very dense sand with very stiff to hard sandy clay and sandy silty clay and was encountered at the maximum explored depth of 125 bgs. Groundwater is estimated to be at a depth of approximately 57 to 73 feet bgs and appears to be perched below the dune sand on top of the Colma formation.

The proposed project would require excavation of approximately 79,000 cubic yards of soils to a depth of approximately 68 feet, 5 inches below Van Ness Avenue and 44 feet below Polk Street to accommodate the four-level below-grade parking garage, foundations, and elevator pits. It is anticipated that the proposed project would be supported on shallow foundation systems, consisting of individual and/or continuous footings or a mat, gaining support in the native soils. As part of the building permit review process, project plans would be reviewed for conformance with the geotechnical investigation recommendations for the proposed project.

**Impact GE-1: The proposed project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, or landslides, and would not be located on unstable soil that could result in lateral spreading, subsidence, liquefaction, or collapse. (Less than Significant)**

**FAULT RUPTURE**

There are no known active faults intersecting the project site and the site in not within an Earthquake Fault Zone. Therefore, the potential of surface rupture occurring at the site is very low. As such, the proposed project would not exacerbate the potential for surface rupture and therefore would have no impact on fault ruptures and no mitigation would be required.

**STRONG SEISMIC GROUND SHAKING**

The San Francisco Bay Area is a seismically active region. The project site is located approximately 9.5 miles northeast of the San Andreas Fault. According to the U.S. Geological Survey, the overall probability of a magnitude 6.7 or greater earthquake to occur in the San Francisco Bay Area during the next thirty years is 72 percent.[132] Therefore, it is probable that a strong to very strong earthquake would affect the proposed project during its lifetime. The severity of the event would depend on a number of conditions, including distance to the epicenter, depth of movement, length of shaking, and the properties of underlying materials. However, the proposed project would be required to comply with the California Building Code (state building code, California Code of Regulations, Title 24) and the San Francisco Building Code, described in more detail below, which ensure the safety of all new construction in the state and city, respectively. Therefore, the proposed project would not have the potential to exacerbate seismic-related ground shaking, and as a result, would have a less-than-significant impact on strong seismic ground shaking. No mitigation would be required.

[132] U.S. Geological Survey, *What is the Probability that an Earthquake will Occur in the Los Angeles Area? In the San Francisco Bay Area?* Available: https://www.usgs.gov/faqs/what-probability-earthquake-will-occurlos-angeles-area-san-francisco-bay-area?qt-news_science_products=0#qt-news_science_products, accessed December 2020.

### LIQUEFACTION AND LATERAL SPREADING

Liquefaction and lateral spreading of soils can occur when ground shaking causes saturated soils to lose strength due to an increase in pore pressure. The geotechnical investigation prepared for the proposed project determined that the soil below the groundwater is sufficiently dense, cohesive, and/or confined, and therefore the potential for liquefaction is low.

Lateral spreading is a phenomenon in which surficial soil displaces along a shear zone that has formed within an underlying liquefied layer. Because the potential for liquefaction at the site is low, the potential for lateral spreading is likewise low. Therefore, this impact would be less than significant and no mitigation would be required. Nevertheless, the proposed project would be required to comply with the California Building Code and the San Francisco Building Code, which would ensure that the proposed project would not exacerbate the potential for hazards related to liquefaction or lateral spreading. Therefore, impacts would be less than significant.

### LANDSLIDES

According to the California Geological Survey, the project site is not within a designated earthquake-induced landslide hazard zone.[133] Nevertheless, as previously discussed, the proposed project would be required to comply with the California Building Code and the San Francisco Building Code, which would ensure that the proposed project would not exacerbate the potential for landslide hazards. Therefore, impacts would be less than significant.

**Impact GE-2: The proposed project would not result in substantial soil erosion or the loss of topsoil. (Less than Significant)**

The project site is fully developed and entirely occupied by the existing building and surface pavements. For this reason, the proposed project would not result in the loss of topsoil. The proposed project would require excavation of approximately 79,000 cubic yards of soil to a depth of approximately 68 feet, 5 inches below Van Ness Avenue and 44 feet below Polk Street, which could create the potential for windborne and waterborne soil erosion. Sloping terrain is more susceptible to soil erosion than flat terrain. Therefore, due to the sloping nature of the project site, soil erosion could occur.

The project sponsor and its contractor would be required to comply with section 146, Construction Site Runoff Control, of the public works code which requires all construction sites to implement best management practices (BMPs) to minimize surface runoff erosion and sedimentation.[134] Pursuant to section 146.7, if construction activities disturb 5,000 square feet or more of ground surface, the project sponsor must develop an erosion and sediment control plan. The erosion and sediment control plan must be submitted to public utilities commission for review and approval prior to commencing construction related activities. The erosion and sediment control plan would identify BMPs to control discharge of sediment and other pollutants from entering the city's combined sewer system during construction. Compliance with section 146 of the public works code would ensure that the proposed project would not result in substantial

[133] California Geological Survey, State of California Seismic Hazard Zones, City and County of San Francisco (Map Scale 1:24,000), November 17, 2000.

[134] SFPUC. 2018. San Francisco Construction Site Runoff Control Program. Available https://sfwater.org/index.aspx?page=235. Accessed December 2020.

loss of topsoil or soil erosion. Therefore, impacts related to loss of topsoil or substantial soil erosion during construction would be less than significant and no mitigation would be required.

**Impact GE-3: The project site would not be located on a geologic unit or soil that is unstable, or that could become unstable as a result of the project. (Less than Significant)**

As described in the geotechnical investigation, the soil that would be exposed at the bottom of the excavation would be predominantly very dense with varying amounts of clay and silt, except at the northeastern corner of the building footprint, where it appears that very stiff to hard sandy clay may be exposed. The geotechnical investigation determined that both of these soils would be capable of supporting new foundation loads on shallow foundations, consisting of mat or spread footings. In addition, the proposed project would be required to comply with the mandatory provisions of the California Building Code and San Francisco Building Code. Adherence to these requirements would further ensure that the project sponsor adequately addresses any potential impacts related to unstable soils as part of the design-level geotechnical investigation that would be prepared for the proposed project. Therefore, any potential impacts related to unstable soils would be less than significant, and no mitigation measures would be required.

**Impact GE-4: The proposed project would not create substantial risks to life or property as a result of being located on expansive soil. (Less than Significant)**

Expansive soils expand and contract in response to changes in soil moisture, most notably when nearby surface soils change from saturated to a low-moisture content condition and back again. The expansion potential of the project site soil, as measured by its plasticity index, has not yet been determined. Nonetheless, the San Francisco Building Code would require an analysis of the project site's potential for soil expansion impacts and, if applicable, implementation of measures to address them as part of the design-level geotechnical investigation prepared for the proposed project. Therefore, potential impacts related to expansive soils would be less than significant, and no mitigation measures would be required.

**Impact GE-5: The proposed project would not directly or indirectly destroy a unique geologic feature of the site. (No Impact)**

The project site slopes upward from southeast to northwest from approximately 125 feet to 155 feet above mean sea level and is currently developed with the existing building complex that covers the entirety of the site. There are no unique geologic features at the project site. Therefore, the proposed project would have no impact on any unique geological features of the site and no mitigation would be required.

**Impact GE-6: The proposed project could directly or indirectly destroy a unique paleontological resource or site. (Less than Significant with Mitigation)**

Paleontological resources include fossilized remains or traces of mammals, plants, and invertebrates, as well as their imprints. Such fossil remains, as well as the geological formations that contain them, are also considered a paleontological resource. Together, they represent a limited, non-renewable scientific and educational resource. To identify impacts on paleontological resources, the paleontological sensitivity of geologic units present within the project site were identified. Paleontological sensitivity is an indicator of the

likelihood of a geologic unit to yield fossils.[135] The fossil-yielding potential of geologic units in a particular area depends on the geologic age and origin of the units, as well as on the processes they have undergone, both geologic and anthropogenic.[136] The potential to affect fossils varies with the depth and type of disturbance, geologic units on the project site, construction activities, and previous disturbance.

As previously described, the project site is underlain by the Colma formation, which generally underlies the dune sands that range from 36 to 47 feet bgs and extends to the maximum boring depth of 125 feet. This geological unit has a moderate sensitivity and potential to yield significant fossils. The proposed project would require excavation to a depth of approximately 68 feet, 5 inches below Van Ness Avenue and 44 feet below Polk Street. As such, there is potential for project construction activities to extend into the Colma formation and disturb significant paleontological resources; the effect of the proposed project on paleontological resources would be significant. Therefore, implementation of Mitigation Measure M-GE-6, Preconstruction Paleontological Evaluation for Project Located in Class 3 (Moderate) Sensitivity Area, would be required to reduce the project's potential impact on paleontological resources to a less-than-significant level.

**MITIGATION MEASURES**

**Mitigation Measure M-GE-6** **Preconstruction Paleontological Evaluation for Project Located in Class 3 (Moderate) Sensitivity Area.** The project sponsor shall engage a qualified paleontologist to complete a site-specific preconstruction paleontological resources evaluation (paleontology preconstruction evaluation) prior to commencing soil-disturbing activities occurring on the project site. Prior to issuance of any demolition permit, the property owner shall submit the paleontology preconstruction evaluation to the ERO for approval. At a minimum, the evaluation shall include:

1. Project description
2. Regulatory environment – outline applicable federal, state, and local regulations
3. Summary of sensitivity classification
4. Research methods, including but not limited to:
    a. Field studies conducted by the approved paleontologist to check for fossils at the surface and assess the exposed sediments.
    b. Literature review to include an examination of geologic maps and a review of relevant geological and paleontological literature to determine the nature of geologic units in the project area.

[135] Society of Vertebrate Paleontology. 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Available: http://vertpaleo.org/Membership/Member-Ethics/SVP _Impact_Mitigation_ Guidelines.aspx. Accessed December 2020.

[136] Anthropogenic means caused by human activity.

c. Locality search to include outreach to the University of California Museum of Paleontology in Berkeley.

5. Results: to include a summary of literature review and finding of potential site sensitivity for paleontological resources; and depth of potential resources if known.

6. Recommendations for any additional measures that could be necessary to avoid or reduce any adverse impacts to recorded and/or inadvertently discovered paleontological resources of scientific importance. Such measures could include:

   **a. Avoidance:** If a known fossil locality appears to contain critical scientific information that should be left undisturbed for subsequent scientific evaluation.

   **b. Fossil Recovery:** If isolated small, medium- or large-sized fossils are discovered during field surveys or construction monitoring, and they are determined to be scientifically significant, they should be recovered. Fossil recovery may involve collecting a fully exposed fossil from the ground surface, or may involve a systematic excavation, depending upon the size and complexity of the fossil discovery. Fossil excavations should be designed in such a way as to minimize construction delays while properly collecting the fossil and associated data according to professional paleontological standards.

   **c. Sampling:** Scientifically significant microfossils (vertebrate, invertebrate, plant, or trace fossils) may be identified in rock matrix during surveys or monitoring, or, if they are known to occur elsewhere in the same geologic unit or type of deposit in the general area, a determination of their presence or absence may require the use of test sampling of rock matrix for screen-washing in a paleontological laboratory. In some cases, depending upon the geologic unit involved, test sampling may be appropriate even if microfossils are not visible in the field. The fossils found, if any, will then be inspected and evaluated to determine their significance and whether additional steps are necessary to reduce paleontological impacts. Such steps may include collection of additional matrix for screen-washing. The decision to sample may not be made until monitoring is occurring, because it is usually triggered by conditions in the field.

   **d. Monitoring:** If scientifically important paleontological resources are known to be present in an area, or if there is a moderate or high likelihood that subsurface fossils are present in geologic units or members thereof within a given project area based on prior field surveys, museum records, or scientific or technical literature,

paleontological monitoring of construction excavations is required. Monitoring involves systematic inspections of graded cut slopes, trench sidewalls, spoils piles, and other types of construction excavations for the presence of fossils, and the fossil recovery and documentation of these fossils before they are destroyed by further ground disturbing actions. Standard monitoring is typically used in the most paleontologically sensitive geographic areas/geologic units (moderate, high and very high potential); while spot-check monitoring is typically used in geographic areas/geologic units of moderate or unknown paleontological sensitivity (moderate or unknown potential). The goal of monitoring is to identify scientifically significant subsurface fossils as soon as they are unearthed in order to minimize damage to them and remove them and associated contextual data from the area of ground disturbance, thereby resulting in subsurface paleontological clearance. Microfossil sampling, macrofossil recovery, and avoidance of fossils may all occur during any monitoring program.

***Significance after Mitigation.*** Under this measure, a paleontological consultant would prepare and implement a paleontology preconstruction evaluation, and, if necessary, conduct monitoring and sampling. In the event that significant paleontological resources are discovered, avoidance or implementation of a fossil recovery program is required. Therefore, the significant information that the paleontological resource(s) provides would either be preserved or documented as required by Mitigation Measure M-GE-6, Preconstruction Paleontological Evaluation for Project Located in Class 3 (Moderate) Sensitivity Area, and would ensure that impacts to paleontological resources would be reduced to less than significant.

**Impact C-GE-1: The proposed project, in combination with cumulative projects, would not result in a cumulative impact related to geology and soils. (Less than Significant)**

Geology and soils impacts are generally site-specific and localized. Cumulative development projects could require various levels of excavation or cut-and-fill, which could affect local geologic conditions, similar to the proposed project. As noted above, the San Francisco Building Code regulates construction in the City and County of San Francisco, and all development projects would be required to comply with its requirements to ensure maximum feasible seismic safety and minimize geologic impacts. Site-specific measures would also be implemented, as site conditions warrant, to reduce any potential impacts from unstable soils, ground shaking, liquefaction, or lateral spreading. The cumulative development projects identified in Table 2, p. 26, and Figure 18, p. 27, would be subject to the same seismic safety standards and building permit review procedures applicable to the proposed project, and are not located immediately adjacent to the project site. Of these cumulative projects, the closest are the 1142 Van Ness Avenue and 1033 Polk Street projects, located approximately 60 feet and 170 feet south of the project site, respectively. Impacts of these cumulative projects would be unlikely to combine with impacts of the proposed project to result in cumulative impacts to paleontological resources. Therefore, cumulative geology and soils impacts would be less than significant and no mitigation would be required.

## 16. Hydrology and Water Quality

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project: | | | | | |
| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? | ☐ | ☐ | ☒ | ☐ | ☐ |
| b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? | ☐ | ☐ | ☒ | ☐ | ☐ |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would: | ☐ | ☐ | ☒ | ☐ | ☐ |
| i) Result in substantial erosion or siltation on- or offsite; | ☐ | ☐ | ☒ | ☐ | ☐ |
| ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite; | ☐ | ☐ | ☒ | ☐ | ☐ |
| iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or | ☐ | ☐ | ☒ | ☐ | ☐ |
| iv) Impede or redirect flood flows? | ☐ | ☐ | ☒ | ☐ | ☐ |
| d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due a project inundation? | ☐ | ☐ | ☐ | ☐ | ☒ |
| e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | ☐ | ☐ | ☒ | ☐ | ☐ |

According to SFPUC 100-Year Storm Flood Risk Map, the project site is not located within a 100-year flood hazard area,[137] or an area identified as being subject to potential inundation in the event of a tsunami along the San Francisco coast or a dam or levee failure.[138] Therefore, the proposed project would not create a risk related to a release of pollutants due to inundation in a flood hazard, tsunami, or seiche zone and topic 14(d) is not applicable to the proposed project and is not discussed below.

[137] San Francisco Public Utilities Commission, 100-Year Storm Flood Risk Map, 2019. Available online at: https://sfplanninggis.org/floodmap/. Accessed December 2020.

[138] City and County of San Francisco, Community Safety Element of the San Francisco General Plan, 2012, Map 5 (Tsunami Hazard Zones San Francisco) and Map 6 (Potential Inundation Areas Due to Reservoir Failure), http://www.sf-planning.org/ftp/General_Plan/Community_Safety_Element_2012.pdf. Accessed December 2020.

**Impact HY-1: The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality. (Less than Significant)**

Project-related wastewater and stormwater would flow to the city's combined stormwater/sewer system and would be treated to standards contained in the city's National Pollutant Discharge Elimination System (NPDES) Permit for the Southeast Water Pollution Control Plant prior to discharge into San Francisco Bay. The NPDES standards are set and regulated by the Regional Water Quality Control Board (regional board). Therefore, because the proposed project's wastewater and stormwater would be treated at the Southeast Water Pollution Control Plant to state standards, the proposed project would not conflict with regional board requirements.

As discussed under Section E.15, Geology and Soils, groundwater is estimated to be at a depth of approximately 57 to 73 feet bgs and would likely be encountered at the maximum excavation depth of approximately 68 feet below Van Ness Avenue. Therefore, dewatering for the proposed project is likely to be necessary during construction. If any groundwater is encountered during construction, it would be discharged into the combined stormwater/sewer system and subject to the requirements of the San Francisco Sewer Use Ordinance (Ordinance No. 19-92, amended by Ordinance No. 116-97), as supplemented by Department of Public Works Order No. 158170. These regulations require a permit from the Wastewater Enterprise Collection System Division of the San Francisco Public Utilities Commission. A permit may be issued only if an effective pretreatment system is maintained and operated. Each permit for such discharge shall contain specified water quality standards and may require the project sponsor to install and maintain meters to measure the volume of the discharge to the combined sewer system.

Construction activities such as excavation would expose soil and could result in erosion and excess sediments being carried in stormwater runoff to the combined stormwater/sewer system. In addition, stormwater runoff from temporary on-site use and storage of vehicles, fuels, waste, and other hazardous materials could carry pollutants to the combined stormwater/sewer system if proper handling methods are not employed. As discussed in Section 15, Geology and Soils, the proposed project would be required to develop and implement an erosion and sediment control plan that would identify BMPs to control discharge of sediment and other pollutants from entering the city's combined sewer system during construction. Further, runoff from the project site would drain into the city's combined stormwater/sewer system, ensuring that such runoff is properly treated at the Southeast Treatment Plant before being discharged into San Francisco Bay.

For these reasons, the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality. This impact would be less than significant and no mitigation would be required.

**Impact HY-2: The proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. (Less than Significant)**

The project site is located in the Downtown San Francisco Groundwater Basin. This basin is not used as a potable water source and there are no plans for development of this basin for groundwater production. Therefore, a sustainable groundwater management plan has not been adopted for the Downtown San Francisco Groundwater Basin. The project site is currently completely covered with impervious surfaces. The

proposed project would not increase the amount of impervious surface at the project site; therefore, the proposed project would not result in any change in groundwater infiltration or runoff on the project site.

As discussed under Section E.15, Geology and Soils, groundwater is estimated to be at a depth of approximately 57 to 73 feet bgs and would likely be encountered at the maximum excavation depth of approximately 68 feet below Van Ness Avenue, and dewatering would likely be required. If groundwater were encountered during on-site excavation, dewatering activities would be necessary. Construction dewatering, if necessary, would represent a temporary condition on the underlying groundwater table. The project would not require long-term dewatering and does not propose to extract any underlying groundwater supplies. For these reasons, the proposed project would not deplete groundwater supplies or substantially interfere with groundwater recharge. This impact would be less than significant and no mitigation would be required.

**Impact HY-3: The proposed project would not result in altered drainage patterns that would cause substantial erosion or flooding or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. (Less than Significant)**

No streams or rivers exist at the project site. Therefore, the proposed project would not alter the course of a stream or river or substantially alter the existing drainage pattern of the project site or area. During the proposed project's construction, a potential for erosion and transportation of soil particles would exist, but as stated above in Impact HY-1, the proposed project would be subject to and be required to comply with regulations that limit the amount of runoff from the project site. The existing project site is completely covered with developed (e.g., impervious) surfaces and structures. The proposed building footprint would also completely cover the project site; thus, project implementation would not result in an increase in impervious surface. Therefore, because the proposed project would not increase impervious surfaces at the project site and the project is required to comply with existing regulations that address stormwater runoff, the proposed project would not result in altered drainage patterns that would cause substantial erosion or flooding or contribute runoff which would exceed the capacity of existing or planned stormwater drainage systems and impacts would be less than significant. No mitigation would be required.

**Impact C-HY-1: The proposed project, in combination with the cumulative projects, would result in less-than-significant cumulative impacts on hydrology and water quality. (Less than Significant)**

The proposed project would result in no impact with respect to release of pollutants due to inundation. Therefore, the project would not have the potential to combine with cumulative development projects to result in a cumulative impact related to this topic.

Like the proposed project, all cumulative development projects identified in Table 2, p. 26, and shown in Figure 18, p. 27, would be required to comply with the city's stormwater management ordinance and guidelines, and all stormwater and wastewater would be treated to the standards in the city's NPDES permit. Therefore, cumulative impacts related to increased run-off and water quality would be less than significant.

With regards to groundwater, the Downtown Groundwater Basin is not a potable water source. Further, upon completion of construction activities, the project would have no impact on groundwater levels. For

these reasons, the project would not combine with cumulative development projects to result in cumulative groundwater impacts.

Overall, the proposed project would not combine with cumulative projects to result in cumulative impacts to hydrology and water quality. No mitigation would be required.

## 17. Hazards and Hazardous Materials

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project: | | | | | |
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | ☐ | ☐ | ☒ | ☐ | ☐ |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | ☐ | ☐ | ☒ | ☐ | ☐ |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | ☐ | ☐ | ☒ | ☐ | ☐ |
| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | ☐ | ☐ | ☐ | ☐ | ☒ |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? | ☐ | ☐ | ☐ | ☐ | ☒ |
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☒ | ☐ | ☐ |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | ☐ | ☐ | ☐ | ☐ | ☒ |

The project site is not included on the list of hazardous materials sites compiled by the California Department of Toxic Substance Control pursuant to Government Code section 65962.5; is not located within an airport land use plan area or within an airport land use plan, or within two miles of a public airport or public use airport which would result in a safety hazard or excessive noise for people residing or working in

the area; and is not located within or adjacent to a wildland area. Therefore Topics E.15(d), E.15(e), and E.15(g) are not applicable to the proposed project.

**Impact HZ-1: The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. (Less than Significant)**

Hazardous materials may be stored on site during construction of the proposed project. These hazardous materials include fuel for construction equipment, paints, solvents, and other types of construction materials that may contain hazardous ingredients. Transportation of hazardous materials to and from the project site would occur on designated hazardous materials routes, by licensed hazardous materials handlers, as required, and would be subject to regulation by the California Highway Patrol and the California Department of Transportation. Compliance with these regulations would reduce any risk from the routine transport, use, or disposal of hazardous materials to a less-than-significant level and no mitigation would be required.

The proposed project's health service, residential and commercial uses would likely result in the use of common types of hazardous materials, such as cleaning products and disinfectants. These products are labeled to inform users of their potential risks and to instruct them in appropriate handling procedures. Most of these materials are consumed through use, resulting in relatively little waste. The proposed project's health service uses would also generate chemical and medical waste. Chemical waste would be used, stored, and disposed of according to manufacturer requirements and subject to existing regulatory programs. Medical waste must be contained separately from other waste at the point of origin and specific regulations apply to the storage, labeling, and disposal of specific types of waste (e.g., biohazardous, sharps, pharmaceutical). The San Francisco Department of Public Health regulates businesses that generate medical waste through the Hazardous Materials and Waste Program and requires a permit for operation of such businesses.[139] These businesses would be required to obtain appropriate permits for health service uses under this program for any medical waste generated on site. For these reasons, hazardous materials used during project operation would not pose any substantial public health or safety hazards through their routine transport, use, or disposal. This impact would be less than significant and no mitigation would be required.

**Impact HZ-2: The proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (Less than Significant)**

A portion of the project site is located in an area of San Francisco governed by article 22A of the Health Code, also known as the Maher Ordinance, meaning that it is known or suspected to contain contaminated soil and/or groundwater.[140] The overarching goal of the Maher Ordinance is to protect public health and safety by requiring appropriate handling, treatment, disposal and when necessary, remediation of contaminated soils that are encountered in the building construction process. Projects that disturb 50 cubic yards or more of soil that are located on sites with potentially hazardous soil or groundwater are subject to this ordinance. The proposed project would require excavation of approximately 79,000 cubic yards of soil to a depth of

[139] San Francisco Department of Public Health, Article 25: Medical Waste Generator Registration, Permitting, Inspection and Fees.

[140] San Francisco Planning Department, San Francisco Property Information Map – Map Viewer, 2019 Available online at: https://sfplanninggis.org/pim/map.html?search=1200%20VAN%20NESS%20AVE&layers=Maher%20Ordinance. Accessed December 2020.

approximately 68 feet, 5 inches below Van Ness Avenue and 44 feet below Polk Street. Therefore, the proposed project is subject to the Maher Ordinance, which is administered and overseen by the San Francisco Department of Public Health (health department). The project sponsor submitted an application to the Maher Program and retained the services of a qualified professional to prepare a phase I environmental site assessment (site assessment) that meets the requirements of article 22A. The findings of the site assessment are discussed below.[141]

To identify the site's potential inclusion on environmental databases and evaluate offsite environmental concerns, Langan reviewed a site-specific radius report provided by Environmental Data Resources, Inc. which searched regulatory agency lists and databases for recorded sites within the industry standard search radii. According to the site assessment the project site had been heavily developed from 1895 to 1906, at which point the previous buildings were destroyed in the fires that accompanied the 1906 earthquake. The site was then constructed with the existing building complex and used for automobile sales and automotive repair. The project site is listed on the HAZNET, EDR Historical Auto Stations, and FINDS databases. The HAZNET listing occurred in 2002 associated with disposal of 0.08 tons of an unspecified organic liquid mixture. Previous environmental investigations at the project site indicate the presence of an approximately 1,500-gallon underground storage tank (UST) that was removed in 1992. However, no records of the UST removal were located by Langan or previous environmental investigators. Additionally, no records of a UST on the project site were reported in the EDR Radius Map report or were apparent on the maps used to develop the site history.

Based on a review of the preliminary geotechnical investigation, the site assessment determined that the project site is likely built over earthquake fill. Analytical results of the earthquake fill typically contains elevated levels of petroleum hydrocarbons and heavy metals. Additionally, the historic use of the site for automobile sales and service may have contributed to elevated levels of petroleum hydrocarbons.

The project sponsor submitted a Maher Application to the San Francisco Department of Health in accordance with article 22A.[142] The health department determined that the project sponsor would be required to collect and analyze additional soil samples after the existing buildings are demolished; prepare and submit a soil management plan that includes procedures for testing, handling, and disposal of soil during project development; prepare and submit a site mitigation plan; and remediate any site contamination in accordance with an approved site mitigation plan prior to the issuance of the building permit. Furthermore, the proposed project would excavate approximately 79,000 cubic yards of soil to construct the four-level parking garage which would remove most of the soil at the project site.

Based on the information and conclusions from the site assessment, and because of required compliance with article 22A, the proposed project would not result in a significant hazard to the public or environment due to the release of hazardous materials into the environment, such as contaminated soil and/or groundwater; the proposed project would result in a less-than-significant impact and no mitigation would be required.

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141 Langan Treadwell Rollo, *Phase I Environmental Site Assessment, 1200 Van Ness Avenue, San Francisco, California,* March 24, 2014.

142 City and County of San Francisco Department of Public Health and Environmental Health. 2020. SFH Article 22A Compliance and SMP Request, 1200 Van Ness Avenue, EHB-SAM No. SMED: 1850. May 21.

**ASBESTOS-CONTAINING MATERIALS**

The project site is occupied by a building that was originally constructed in 1911. The proposed project would include demolition of the existing building complex. Based on the date of construction of the building, asbestos-containing materials may still be present in building materials that could become airborne as a result of demolition disturbance.

The California Department of Toxic Substance Control considers asbestos hazardous, and removal of asbestos-containing materials is required prior to demolition or construction activities that could result in disturbance of these materials. Asbestos-containing materials must be removed in accordance with local and state regulations, the Bay Area Air Quality Management District (air district), the California Occupational Safety and Health Administration (occupational safety and health administration), and California Department of Health Services requirements.

Specifically, section 19827.5 of the California Health and Safety Code requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The California legislature vests the air district with the authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and the air district is to be notified 10 days in advance of any proposed demolition or abatement work. Any asbestos-containing material disturbance at the project site would be subject to the requirements of air district Regulation 11, Rule 2: Hazardous Materials—Asbestos Demolition, Renovation, and Manufacturing. The local office of the occupational safety and health administration must also be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow state regulations contained in Title 8 of California Code of Regulations section 1529 and sections 341.6 through 341.14, where there is asbestos related work involving 100 gsf or more of asbestos-containing material. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services. The contractor and hauler of the material are required to file a Hazardous Waste Manifest that details the hauling of the material from the site and the disposal of it. Pursuant to California law, the building department would not issue the required permit until the applicant has complied with the requirements described above.

These regulations and procedures already established as part of the building permit review process would ensure that any potential impacts due to asbestos-containing materials would be less than significant and no mitigation would be required.

**LEAD-BASED PAINT**

Similar to asbestos-containing materials, lead-based paint could be present at the site, based on the age of the building. Work that could result in disturbance of lead paint must comply with section 3426 of the San Francisco Building Code, Work Practices for Lead-Based Paint on Pre-1979 Buildings and Steel Structures. Where there is any work that may disturb or remove lead paint on the exterior of any building built prior to 1979, section 3426 requires specific notification and work standards, and identifies prohibited work methods and penalties. (The reader may be familiar with notices commonly placed on residential and other buildings in San Francisco that are undergoing re-painting. These notices are generally affixed to a drape that covers all or portions of a building and are a required part of the section 3426 notification procedure.)

Section 3426 applies to the exterior of all buildings or steel structures on which original construction was completed prior to 1979 (which are assumed to have lead-based paint on their surfaces, unless demonstrated otherwise through laboratory analysis), and to the interior of residential buildings, hotels, and child care centers. The ordinance contains performance standards, including establishment of containment barriers, at least as effective at protecting human health and the environment as those in the U.S. Department of Housing and Urban Development Guidelines (the most recent Guidelines for Evaluation and Control of Lead-Based Paint Hazards) and identifies prohibited practices that may not be used in disturbances or removal of lead-based paint. Any person performing work subject to the ordinance shall, to the maximum extent possible, protect the ground from contamination during exterior work; protect floors and other horizontal surfaces from work debris during interior work; and make all reasonable efforts to prevent migration of lead paint contaminants beyond containment barriers during the course of the work. Clean-up standards require the removal of visible work debris, including the use of a High Efficiency Particulate Air Filter (HEPA) vacuum following interior work.

The ordinance also includes notification requirements and requirements for signs. Prior to the commencement of work, the responsible party must provide written notice to the director of the building department, of the address and location of the project; the scope of work, including specific location within the site; methods and tools to be used; the approximate age of the structure; anticipated job start and completion dates for the work; whether the building is residential or nonresidential, owner-occupied or rental property; the dates by which the responsible party has fulfilled or will fulfill any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager number of the party who will perform the work. Further notice requirements include a Posted Sign notifying the public of restricted access to the work area, a Notice to Residential Occupants, Availability of Pamphlet related to protection from lead in the home, and Notice of Early Commencement of Work (by Owner, Requested by Tenant), and Notice of Lead Contaminated Dust or Soil, if applicable. Section 3426 contains provisions regarding inspection and sampling for compliance by the San Francisco Department of Building Inspection, as well as enforcement, and describes penalties for non-compliance with the requirements of the ordinance.

The proposed demolition would also be subject to the occupational safety and health administration's Lead in Construction Standard (8 CCR section 1532.1). This standard requires development and implementation of a lead compliance plan when materials containing lead would be disturbed during construction. The plan must describe activities that could emit lead, methods that will be used to comply with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. The occupational safety and health administration would require 24-hour notification if more than 100 square feet of materials containing lead would be disturbed.

Implementation of procedures required by section 3426 of the building code and the Lead in Construction Standard would ensure that potential impacts of demolition or renovation of structures with lead-based paint would be less than significant and no mitigation would be required.

Based on mandatory compliance with existing regulatory requirements described above, the proposed project would not result in a significant hazard to the public or environment from contaminated soil and/or groundwater, asbestos, or lead-based paint, and the proposed project would result in a less-than-significant impact with respect to these hazards.

**Impact HZ-3: The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school. (Less than Significant)**

The Redding Elementary School is located approximately 0.25 mile northeast of the project site. However, as described in Impact HZ-1, hazardous materials used during project operation would not pose any substantial public health or safety hazards through their routine transport, use, or disposal. As noted in Impact HZ-2, the project sponsor is required to prepare a site mitigation plan in accordance with health code article 22A, which would ensure the project would not result in a significant hazard to the public or environment due to the release of hazardous soil and groundwater. Similarly, hazardous building materials, such as asbestos and lead, would be remediated in accordance with regulatory requirements. These regulations, discussed in Impact HZ-2, would ensure that the proposed project would not emit hazardous emissions, and would not handle hazardous or acutely hazardous materials, substances, or waste. Therefore, this impact would be less than significant.

**Impact HZ-4: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and would not expose people or structures to a significant risk of loss, injury, or death involving fires. (Less than Significant)**

San Francisco ensures fire safety primarily through provisions of the building and fire codes. Final building plans are reviewed by the San Francisco Fire Department (as well as the building department), to ensure conformance with these provisions. In this way, potential fire hazards, including those associated with hydrant water pressures and emergency access, would be addressed during the permit review process. Compliance with fire safety regulations would ensure that the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan or expose people or structures to a significant risk of loss, injury, or death involving fires.

Implementation of the proposed project could add incrementally to congested traffic conditions in the immediate area in the event of an emergency evacuation. However, the proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan and this impact would be less than significant.

**Impact C-HZ-1: The proposed project, in combination with cumulative projects, would not result in a cumulative impact related to hazards and hazardous materials. (Less than Significant)**

The geographic context for an analysis of cumulative impacts related to handling of hazardous materials is generally confined to the project site and the nearby surrounding area. Nearby cumulative development projects as identified in Table 2, p. 26, would be subject to the same fire safety and hazardous materials cleanup ordinances applicable to the proposed project. For these reasons, the proposed project would not combine with cumulative projects in the project vicinity to create a significant cumulative impact related to hazards and hazardous materials. Cumulative hazardous materials impacts would be less than significant and no mitigation would be required.

## 18. Mineral Resources

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project: | | | | | |
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | ☐ | ☐ | ☐ | ☐ | ☒ |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | ☐ | ☐ | ☐ | ☐ | ☒ |

All land in San Francisco, including the project site, is designated Mineral Resource Zone 4 (MRZ4) by the California Division of Mines and Geology under the Surface Mining and Reclamation Act of 1975.[143] This designation indicates that there is inadequate information available for assignment to any other mineral resource zone, and thus, the project site is not a designated area of significant mineral deposits. Further, according to the general plan, no significant mineral resources exist in San Francisco. No operational mineral resource recovery sites exist in the project area. Therefore, Topics E.18(a) and E.18(b) are not applicable to the project.

## 19. Energy

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Would the project: | | | | | |
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | ☐ | ☐ | ☒ | ☐ | ☐ |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | ☐ | ☐ | ☒ | ☐ | ☐ |

**Impact EN-1: The proposed project would result in increased energy consumption but would not encourage activities that result in the use of large amounts of fuel, water, or energy or use these in a wasteful manner. (Less than Significant)**

In California, energy consumption in buildings is regulated by Title 24 of the California Code of Regulations. Title 24 includes standards that regulate energy consumption for the heating, cooling, ventilation, and

[143] California Division of Mines and Geology, *Open File Report 96 03 and Special Report 146, Parts I and II*, 1996. Available: http://www.conservation.ca.gov/cgs/minerals/mlc/Pages/index.aspx.

lighting of residential and non-residential buildings. In San Francisco, documentation demonstrating compliance with Title 24 standards is required to be submitted with a building permit application. Compliance with Title 24 standards is enforced by the building department. The proposed project, which would be located on an infill site, would include new construction. The proposed project would be required to comply with the standards of Title 24 and the requirements of the San Francisco Green Building Code.

Non-renewable energy consumption would occur during the proposed project construction and operational phases. Construction energy consumption would be primarily in the form of indirect energy inherent in the production of materials used for construction (e.g., the energy necessary to manufacture a steel beam from raw materials) and the fuel used by construction equipment. Construction-related energy consumption is roughly proportional to the size of the new building proposed.

Operational-related energy consumption would include electricity and natural gas, as well as fuel used by residents and employees as expressed through vehicle miles traveled. Electricity and natural gas would be used for building space heating and lighting, as well as for operation of equipment and machines.

Energy conservation design features that meet state and local goals for energy efficiency and renewable energy have been incorporated into the project design to reduce wasteful, inefficient, and unnecessary consumption of energy during project construction and operation. As stated above, the proposed project would be required to comply with the standards of Title 24 and the requirements of the San Francisco Green Building Code, thus minimizing the amount of fuel, water, and energy used. The proposed project would also incorporate transportation demand management measures into its design, such as compliance with the city's Commuter Benefits Ordinance, parking cash-out program, Transportation Sustainability Fee, Transportation Demand Management Program, Jobs-Housing Linkage Program, bicycle parking, showers, and lockers, green building requirements for fuel-efficient vehicle and carpool parking, and car sharing requirements, and would be in proximity to several public transportation options. These features would minimize the amount of transportation fuel consumed. As discussed in Section E.5, Transportation and Circulation, the project site is in an area with a comparably low level of VMT per capita, relative to the regional average, and new residents would most likely engage in vehicle use patterns similar to those of the existing population in the neighborhood and general vicinity. Given the project's features and location, it would not result in wasteful use of fuel from vehicle trips. For these reasons, the proposed project would not use energy resources in a wasteful, inefficient, or unnecessary manner, nor would the proposed project conflict with or obstruct implementation of a state or local plan for renewable energy or energy efficiency. This impact would be less than significant and no mitigation would be required.

**Impact C-EN-1: The proposed project, in combination with cumulative projects, would increase the use of energy, fuel and water resources, but not in a wasteful manner. (Less than Significant)**

The geographic context for the analysis of cumulative impacts associated with energy is the service territory of the energy utility that serves the project site, PG&E, while the geographic context for the analysis of cumulative impacts associated with fuel use is the city. The proposed project would involve construction of health service, residential, retail, and restaurant uses, resulting in an increase of energy use at the site. Like the proposed project, all new development in the city would be required to comply with the standards of Title 24 and the San Francisco Green Building Code, thereby minimizing the amount of fuel, water, and energy used. Per capita VMT in the city is relatively low compared with the regional average; therefore, cumulative development, including the project, would not result in wasteful use of fuel from transportation.

As such, the proposed project, in combination with cumulative projects, would have less-than-significant cumulative energy impacts and no mitigation would be required.

## 20. Agriculture and Forestry Resources

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project: | | | | | |
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | ☐ | ☐ | ☐ | ☐ | ☒ |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | ☐ | ☐ | ☐ | ☐ | ☒ |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | ☐ | ☐ | ☐ | ☐ | ☒ |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | ☐ | ☐ | ☐ | ☐ | ☒ |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use or forest land to non-forest use? | ☐ | ☐ | ☐ | ☐ | ☒ |

The project site is located within an urbanized area of San Francisco. No land in San Francisco County has been designated by the California Department of Conservation Farmland Mapping and Monitoring Program as agricultural land. Because the project site does not contain agricultural uses and is not zoned for such uses, the proposed project would not require the conversion of any land designated as prime farmland, unique farmland, or Farmland of Statewide Importance to nonagricultural use. The proposed project would

not conflict with any existing agricultural zoning or Williamson Act contracts, as no lands in San Francisco are zoned agricultural or are under Williamson Act contracts.[144] No land in San Francisco is designated as forest land or as Timberland Production by the California Public Resources Code or Government Code. Therefore, the proposed project would not conflict with zoning for forest land, cause a loss of forest land, or convert forest land to a different use. For these reasons, Topics E.20(a), E.20(b), E.20(c), E.20(d), and E.20(e) are not applicable to the proposed project.

## 21. Wildfire

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project: | | | | | |
| a) Substantially impair an adopted emergency response plan or emergency evacuation plans? | ☐ | ☐ | ☐ | ☐ | ☒ |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | ☐ | ☐ | ☐ | ☐ | ☒ |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | ☐ | ☐ | ☐ | ☐ | ☒ |
| d) Expose people or structures to significant risks including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | ☐ | ☐ | ☐ | ☐ | ☒ |

The City and County of San Francisco and bordering areas within San Mateo County do not have any state responsibility areas for fire prevention or lands classified as very high fire hazard severity zones,[145] therefore, this topic is not applicable. See Section E.17, Hazards and Hazardous Materials, for a discussion of wildland fire risks.

[144] San Francisco is identified as "Urban and Built-Up Land" on the California Department of Conservation, 2008, Important Farmland in California Map, www.consrv.ca.gov, accessed July 2019.

[145] California Board of Forestry and Fire Protection, State Responsibility Area Viewer, 2019. Available at: https://bofdata.fire.ca.gov/projects-and-programs/state-responsibility-area-viewer/, accessed July 2019.

## 22. Mandatory Findings of Significance

| Topics: | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact | Not Applicable |
|---|---|---|---|---|---|
| Does the project: | | | | | |
| a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory? | ☐ | ☒ | ☐ | ☐ | ☐ |
| b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.) | ☐ | ☒ | ☐ | ☐ | ☐ |
| c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | ☐ | ☒ | ☐ | ☐ | ☐ |

Note: Authority cited: sections 21083 and 21083.05, 21083.09 Public Resources Code. Reference: section 65088.4, Gov. Code; sections 21073, 21074 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21080.3.1, 21080.3.2,21082.3, 21084.2, 21084.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino,(1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.

The proposed project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. As discussed in Section E.3, Cultural Resources, implementation of the proposed project would not result in a substantial adverse change in the significance of an archeological resource or a tribal cultural resource and would not disturb human remains, with implementation of Mitigation Measures M-CR-3 and M-TC-1. As discussed in Section E.15, Geology and Soils, Mitigation Measure M-GE-6 would ensure that impacts related to unique paleontological resources or sites would be less than significant. For these reasons, the proposed project would not result in the elimination of important examples of major periods of California history or prehistory.

As discussed in Section E.6, Noise, Mitigation Measure M-NO-1 would ensure that impacts related to construction noise would be less than significant and would not combine with other projects in the vicinity to create cumulative noise impacts. Implementation of Mitigation Measure M-NO-2 would ensure that construction-period vibration would not substantially affect adjacent vibration-sensitive structures, including historic buildings. As discussed in Section E.7, Air Quality, implementation of Mitigation Measure

M-AQ-4 would ensure that impacts related to construction-period air pollutant emissions would be less than significant and would not result in adverse health effects to people living in the area. With implementation of M-AQ-4, the proposed project's contribution to cumulative air quality impacts would be reduced to a less-than-significant level. As discussed in Section E, Evaluation of Environmental Effects, the proposed project would not make a considerable contribution to any other cumulative environmental impacts.

## F. Mitigation Measures

**Mitigation Measure M-CR-3**

**Archeological Testing.** Based on the reasonable potential that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effects from the proposed project on buried or submerged historical resources and on human remains and associated or unassociated funerary objects. The project sponsor shall retain the services of an archeological consultant from the rotational qualified archeological consultants list (QACL) maintained by the planning department archeologist. After the first project approval action or as directed by the Environmental Review Officer (ERO), the project sponsor shall contact the department archeologist to obtain the names and contact information for the next three archeological consultants on the QACL.

The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the ERO. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines section 15064.5 (a)(c).

**Archeological Testing Program.** The purpose of the archeological testing program will be to determine to the extent possible the presence or absence of archeological resources and to identify and to evaluate whether any archeological resource encountered on the site constitutes a historical resource under CEQA.

The archeological testing program shall be conducted in accordance with the approved archeological testing plan (ATP). The archeological consultant and the ERO shall consult on the scope of the ATP, which shall be approved by the ERO prior to any project-related soils disturbing activities

commencing. The ATP shall be submitted first and directly to the ERO for review and comment and shall be considered a draft subject to revision until final approval by the ERO. The archeologist shall implement the approved testing as specified in the approved ATP prior to and/or during construction.

The ATP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, lay out what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. The ATP shall also identify the testing method to be used, the depth or horizontal extent of testing, the locations recommended for testing, and the archeological monitoring requirements for construction soil disturbance as warranted.

**Discovery Treatment Determination.** At the completion of the archeological testing program, the archeological consultant shall submit a written summary of the findings to the ERO. The findings memo shall describe and identify each resource and provide an initial assessment of the integrity and significance of encountered archeological deposits

If the ERO in consultation with the archeological consultant determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, the ERO, in consultation with the project sponsor, shall determine whether preservation of the resource in place is feasible. If so, the proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource and the archeological consultant shall prepare an archeological resource preservation plan (ARPP), which shall be implemented by the project sponsor during construction. The consultant shall submit a draft ARPP to the planning department for review and approval.

If preservation in place is not feasible, a data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible. The ERO in consultation with the archeological consultant shall also determine if additional treatment is warranted, which may include additional testing and/or construction monitoring.

**Consultation with Descendant Communities.** On discovery of an archeological site with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group an appropriate representative of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to offer recommendations to the ERO regarding appropriate archeological treatment

of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site.

**Archeological Data Recovery Program**. An archeological data recovery program shall be conducted in accordance with an archeological data recovery plan (ADRP) if all three of the following conditions apply: (1) a resource has the potential to be significant, (2) preservation-in-place is not feasible, and (3) the ERO determines that an archeological data recovery program is warranted. The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archeological consultant shall submit a draft ADRP to the ERO.

The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.

The scope of the ADRP shall include the following elements:

- **Field Methods and Procedures:** Descriptions of proposed field strategies, procedures, and operations.
- **Cataloguing and Laboratory Analysis:** Description of selected cataloguing system and artifact analysis procedures.
- **Discard and Deaccession Policy:** Description of and rationale for field and post-field discard and deaccession policies.
- **Security Measures:** Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities.
- **Final Report:** Description of proposed report format and distribution of results.
- **Curation:** Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

**Human Remains and Funerary Objects.** The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and federal laws. This shall include immediate notification of the ERO and the Medical Examiner of the City and County of San Francisco and, in the event of the Medical Examiner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission, who shall appoint a Most Likely Descendant (MLD). The MLD will complete his or her inspection of the remains and make recommendations or preferences for treatment within 48 hours of being granted access to the site (Public Resources Code section 5097.98). The ERO also shall be notified immediately upon the discovery of human remains.

The project sponsor and ERO shall make all reasonable efforts to develop a Burial Agreement ("Agreement") with the MLD, as expeditiously as possible, for the treatment and disposition, with appropriate dignity, of human remains and associated or unassociated funerary objects (as detailed in CEQA Guidelines section 15064.5(d)). The Agreement shall take into consideration the appropriate excavation, removal, recordation, scientific analysis, custodianship, curation, and final disposition of the human remains and funerary objects. If the MLD agrees to scientific analyses of the remains and/or associated or unassociated funerary objects, the archeological consultant shall retain possession of the remains and funerary objects until completion of any such analyses, after which the remains and funerary objects shall be reinterred or curated as specified in the Agreement.

Nothing in existing state regulations or in this mitigation measure compels the project sponsor and the ERO to accept treatment recommendations of an MLD. However, if the ERO, project sponsor and MLD are unable to reach an Agreement on scientific treatment of the remains and funerary objects, the ERO, with cooperation of the project sponsor, shall ensure that the remains and/or mortuary materials are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity, in a location not subject to further or future subsurface disturbance.

Treatment of historic-period human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activity, additionally, shall follow protocols laid out in the project's archeological treatment documents, and in any related agreement established between the project sponsor, Medical Examiner and the ERO.

**Archeological Public Interpretation Plan.** The project archeological consultant shall submit an archeological public interpretation plan (APIP) if a significant archeological resource is discovered during a project. If the resource to be interpreted is a tribal cultural resource, the APIP shall be prepared in consultation with and developed with the participation of

Ohlone tribal representatives. The APIP shall describe the interpretive product(s), locations or distribution of interpretive materials or displays, the proposed content and materials, the producers or artists of the displays or installation, and a long-term maintenance program. The APIP shall be sent to the ERO for review and approval. The APIP shall be implemented prior to occupancy of the project.

**Archeological Resources Report.** Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the testing and any monitoring undertaken pursuant to this measure to the ERO. The archeological consultant shall submit a draft archeological resources report (ARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describe the archeological, historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken, and if applicable, discuss curation arrangements. Formal site recordation forms (CA DPR 523 series) shall be attached to the ARR as an appendix.

Once approved by the ERO, copies of the ARR shall be distributed as follows: California Archeological Site Survey Northwest Information Center (NWIC) shall receive one copy and the ERO shall receive a copy of the transmittal of the ARR to the NWIC. The environmental planning division of the planning department shall receive one bound hard copy of the ARR. Digital files that shall be submitted to the environmental division include an unlocked, searchable PDF version of the ARR, GIS shapefiles of the site and feature locations, any formal site recordation forms (CA DPR 523 series), and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. The PDF ARR, GIS files, recordation forms, and/or nomination documentation should be submitted via USB or other stable storage device. If a descendant group was consulted during archeological treatment, a PDF of the ARR shall be provided to the representative of the descendant group.

**Curation.** If archeological data recovery is undertaken, materials and samples of future research value from significant archeological resources shall be permanently curated at a facility approved by the ERO.

**Mitigation Measure M-TC-1** **Tribal Cultural Resources Archeological Resource Preservation Plan and/or Interpretive Program.**

**Preservation in Place.** In the event of the discovery of an archeological resource of Native American origin, the Environmental Review Officer (ERO), the project sponsor, and the tribal representative, shall consult to determine whether preservation in place would be feasible and effective. If it is determined that preservation-in-place of the tribal cultural resource would be both feasible and effective, then the archeological consultant shall prepare an archeological resource preservation plan (ARPP), which shall be

implemented by the project sponsor during construction. The consultant shall submit a draft ARPP to the planning department for review and approval.

**Interpretive Program.** If the ERO, in consultation with the affiliated Native American tribal representatives and the project sponsor, determines that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option, the project sponsor shall implement an interpretive program of the tribal cultural resource in consultation with affiliated tribal representatives. A tribal cultural resources interpretation plan produced in consultation with the ERO and affiliated tribal representatives, at a minimum, and approved by the ERO would be required to guide the interpretive program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, artifacts displays and interpretation, and educational panels or other informational displays.

**Mitigation Measure M-NO-1**

**Construction Noise Control**. Prior to issuance of any demolition or building permit, the project sponsor shall submit a project-specific construction noise control plan to the Environmental Review Officer (ERO) or the ERO's designee for approval. The construction noise control plan shall be prepared by a qualified acoustical engineer, with input from the construction contractor, and include measures to reduce construction noise so as avoid a potential noise impact on nearby sensitive users. The construction noise control plan shall identify noise control measures to meet a performance target of construction activities not resulting in the following: 10 dBA above the ambient noise level at noise-sensitive receptors and nighttime sleep disturbance, defined as interior noise levels at residential uses exceeding 45 dBA during nighttime hours. The project sponsor shall ensure that requirements of the construction noise control plan are included in contract specifications. The plan shall include specific measures to reduce nighttime construction noise. The plan shall also include measures for notifying the public of construction activities, complaint procedures, and a plan for monitoring construction noise levels in the event complaints are received. The construction noise control plan shall include measures to reduce construction noise levels, including, but not limited to the following measures, as feasible:

- Use construction equipment that is in good working order, and inspect mufflers for proper functionality;
- Select "quiet" construction methods and equipment (e.g., improved mufflers, use of intake silencers, engine enclosures);

- Use construction equipment with lower noise emission ratings whenever possible, particularly for air compressors;
- Prohibit the idling of inactive construction equipment for more than five minutes;
- Locate stationary noise sources (such as compressors) as far from nearby noise-sensitive receptors as possible, muffle such noise sources, and construct barriers around such sources and/or the construction site.
- Avoid placing stationary noise-generating equipment (e.g., generators, compressors) within noise-sensitive buffer areas (as determined by the acoustical engineer) immediately adjacent to noise-sensitive receptors.
- Enclose or shield stationary noise sources from neighboring noise-sensitive receptors with noise barriers to the extent feasible. To further reduce noise, locate stationary equipment in pit areas or excavated areas, if feasible; and
- Install temporary barriers, barrier-backed sound curtains and/or acoustical panels around working powered impact equipment and, if necessary, around the project site perimeter. When temporary barrier units are joined together, the mating surfaces shall be flush with each other. Gaps between barrier units, and between the bottom edge of the barrier panels and the ground, shall be closed with material that completely closes the gaps, and dense enough to attenuate noise.

The construction noise control plan shall include the following measures for notifying the public of construction activities, complaint procedures and monitoring of construction noise levels:

- Designation of an on-site construction noise manager for the project;
- A sign posted on-site describing noise complaint procedures and a complaint hotline number that shall always be answered during construction;
- A procedure for notifying the planning department of any noise complaints within one week of receiving a complaint;
- A list of measures for responding to and tracking complaints pertaining to construction noise. Such measures may include the evaluation and implementation of additional noise controls at sensitive receptors (residences, hospitals, convalescent homes, schools, churches, hotels and motels, and sensitive wildlife habitat); and

- Conduct noise monitoring (measurements) at the beginning of major construction phases (e.g., demolition, grading, excavation) to determine the effectiveness of noise attenuation measures and, if necessary, implement additional noise control measures.

**Mitigation Measure M-NO-2**

**Protection of Adjacent Building and Vibration Monitoring During Construction**. Prior to issuance of any demolition or building permit, the project sponsor shall submit a project-specific pre-construction survey of the building at 1101-1127 Polk Street (Assessor's Block 0691, Lot 002) and a vibration management and monitoring plan to the Environmental Review Officer (ERO) or the ERO's designee for approval. The plan shall identify all feasible means to avoid damage to the building at 1101-1127 Polk Street. The project sponsor shall ensure that the following requirements of the pre-construction survey and the vibration management and monitoring plan are included in contract specifications, as necessary.

*Pre-construction Survey*. Prior to the start of any ground-disturbing activity, the project sponsor shall engage a qualified historic preservation professional to undertake a pre-construction survey of the 1101-1127 Polk Street building. The pre-construction survey shall include descriptions and photographs of the 1101-1127 Polk Street building including all facades, roofs, and details of the character-defining features that could be damaged during construction, and shall document existing damage, such as cracks and loose or damaged features (as allowed by the property owner). The report shall also include pre-construction drawings that record the pre-construction condition of the building and identify cracks and other features to be monitored during construction. The preconstruction survey shall be submitted to the ERO for review and approval prior to the start of vibration-generating construction activity.

*Vibration Management and Monitoring Plan*. The project sponsor shall undertake a vibration management and monitoring plan to avoid or reduce project-related construction vibration damage to the 1101-1127 Polk Street building and to ensure that any such damage is documented and repaired. Prior to issuance of any demolition or building permit, the project sponsor shall submit the plan to the ERO for review and approval. The plan shall include, at a minimum, the following components:

- *Maximum Vibration Level*. Based on the anticipated construction and condition of the 1101-1127 Polk Street building, a qualified acoustical/vibration consultant in coordination with a qualified historic preservation professional shall establish a maximum vibration level that shall not be exceeded at the 1101-1127 Polk Street building based on existing conditions, character-defining features, soil conditions, and anticipated construction practices. (The common standard for historic buildings is a peak particle velocity of 0.25 inch per second.)

- *Vibration-generating Equipment*. The plan shall identify all vibration-generating equipment to be used during each phase of construction (site preparation, clearing, demolition, excavation, shoring, foundation installation, and building construction).

- *Alternative Construction Equipment and Techniques*. The plan shall identify potential alternative equipment and techniques that could be implemented if construction vibration levels are observed in excess of the established standard.

- *Buffer Distances*. Based on vibration levels and site constraints, the plan shall identify whether buffer distances should be maintained between the operation of vibration-generating construction equipment and the 1101-1127 Polk Street building to avoid damage, to the extent possible.

- *Vibration Monitoring*. The plan shall identify the method and equipment for vibration monitoring to ensure that vibration levels do not exceed the established standards identified in the plan.

    - Should construction vibration levels be observed in excess of the standards established in the plan, the contractor(s) shall halt construction and put alternative construction techniques identified in the plan into practice, to the extent feasible.

    - The historic preservation professional shall inspect the 1101-1127 Polk Street building (as allowed by the property owner) in the event that construction activities exceed vibration levels identified in the plan.

    - The historic preservation professional shall submit monthly reports to the ERO during vibration-inducing activity periods that identify and summarize any vibration level exceedances and describe the actions taken to reduce vibration.

    - If vibration has damaged the 1101-1127 Polk Street building, the historic preservation professional shall immediately notify the ERO and prepare a damage report documenting the features of the building that have been damaged.

    - Following incorporation of the alternative construction techniques and/or planning department review of the damage report, vibration monitoring shall recommence to ensure that vibration levels at the 1101-1127 Polk Street building are not exceeded.

- *Periodic Inspections.* The plan shall identify the intervals and parties responsible for periodic inspections. The historic preservation professional shall conduct regular periodic inspections of the 1101-1127

Polk Street building during vibration-generating construction activity on the project site. The plan will specify how often inspections shall occur.

- *Repair Damage.* The plan shall identify provisions to be followed should damage to the 1101-1127 Polk Street building occur due to construction-related vibration. The plan shall state that the building shall be remediated to its pre-construction condition (as allowed by the property owner) at the conclusion of vibration-generating activities on the site.

*Vibration Monitoring Results Report.* After construction is complete, the historic preservation professional shall submit to the ERO a final vibration monitoring report. The report shall include, at a minimum, collected monitoring records, a building condition summary, descriptions of all instances of vibration level exceedance, identification of damage incurred due to vibration, and corrective actions taken to restore any damage caused by construction-related vibration. The ERO shall review and approve the vibration monitoring results report.

**Mitigation Measure M-AQ-4** **Clean Off-Road Construction Equipment.** The project sponsor shall comply with the following:

**A. Engine Requirements**

1. All off-road equipment greater than 25 hp and operating for more than 20 total hours over the entire duration of construction activities shall have engines that meet or exceed either U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 4 Interim or Tier 4 Final off-road emission standards.

2. Where access to alternative sources of power are available, portable diesel engines (e.g., generators) shall be prohibited.

3. Diesel engines, whether for off-road or on-road equipment, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions). The contractor shall post legible and visible signs in English, Spanish, and Chinese, in designated queuing areas and at the construction site to remind operators of the two minute idling limit.

4. The project sponsor shall instruct construction workers and equipment operators on the maintenance and tuning of construction equipment and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications.

**B. Waivers**

1. The planning department's environmental review officer or designee (ERO) may waive the alternative source of power requirement of Subsection (A)(2) if an alternative source of power is limited or infeasible at the project site. If the ERO grants the waiver, the contractor must submit documentation that the equipment used for on-site power generation meets the requirements of Subsection (A)(1).

2. The ERO may waive the equipment requirements of Subsection (A)(1) if: a particular piece of off-road equipment is technically not feasible; the equipment would not produce desired emissions reduction due to expected operating modes; or there is a compelling emergency need to use off-road equipment that is not Tier 4 compliant. If the ERO grants the waiver, the contractor must use the next cleanest piece of off-road equipment, according to the following, or another alternative that results in comparable reductions of diesel particulate matter.

| Off-Road Equipment Compliance Step-Down Schedule | | |
|---|---|---|
| **Compliance Alternative** | **Engine Emission Standard** | **Emissions Control** |
| 1 | Tier 2 | ARB Level 3 VDECS |
| 2 | Tier 2 | ARB Level 2 VDECS |
| 3 | Tier 2 | ARB Level 1 VDECS |
| 4 | Tier 2 | Alternative Fuel* |

**How to Use the Table:** If the ERO determines that the equipment requirements cannot be met, then the project sponsor would need to meet Compliance Alternative 1. If the ERO determines that the contractor cannot supply off-road equipment meeting Compliance Alternative 1, then the contractor must meet Compliance Alternative 2. If the ERO determines that the contractor cannot supply off-road equipment meeting Compliance Alternative 2, then the contractor must meet Compliance Alternative 3.
* Alternative fuels are not a VDECS.

**C. Construction Emissions Minimization Plan:** Before starting on-site construction activities, the contractor shall submit a construction emissions minimization plan (plan) to the ERO for review and approval. The plan shall state, in reasonable detail, how the contractor will meet the requirements of section A.

1. The plan shall include estimates of the construction timeline by phase, with a description of each piece of off-road equipment required for every construction phase. The description may include (as reasonably available at the time of plan submission), but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For VDECS installed, the description may

include: technology type, serial number, make, model, manufacturer, ARB verification number level, and installation date and hour meter reading on installation date. For off-road equipment using alternative fuels, the description shall also specify the type of alternative fuel being used.

2. The project sponsor shall ensure that all applicable requirements of the plan have been incorporated into the contract specifications. The plan shall include a certification statement that the project sponsor agrees to comply fully with the plan.

3. The project sponsor shall make the plan available to the public for review on site during working hours. The project sponsor shall post at the construction site a legible and visible sign summarizing the plan. The sign shall also state that the public may ask to inspect the plan for the project at any time during working hours and shall explain how to request to inspect the plan. The project sponsor shall post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way.

**D. Monitoring:** After start of construction activities, the contractor shall submit reports every six months to the ERO documenting compliance with the plan. After completion of construction activities and prior to receiving a final certificate of occupancy, the project sponsor shall submit to the ERO a final report summarizing construction activities, including the start and end dates and duration of each construction phase, and the specific information required in the plan.

**Mitigation Measure M-GE-6**

**Preconstruction Paleontological Evaluation for Project Located in Class 3 (Moderate) Sensitivity Area.** The project sponsor shall engage a qualified paleontologist to complete a site-specific preconstruction paleontological resources evaluation (paleontology preconstruction evaluation) prior to commencing soil-disturbing activities occurring on the project site. Prior to issuance of any demolition permit, the property owner shall submit the paleontology preconstruction evaluation to the ERO for approval. At a minimum, the evaluation shall include:

1. Project description

2. Regulatory environment – outline applicable federal, state, and local regulations

3. Summary of sensitivity classification

4. Research methods, including but not limited to:

a. Field studies conducted by the approved paleontologist to check for fossils at the surface and assess the exposed sediments.

b. Literature review to include an examination of geologic maps and a review of relevant geological and paleontological literature to determine the nature of geologic units in the project area.

c. Locality search to include outreach to the University of California Museum of Paleontology in Berkeley.

5. Results: to include a summary of literature review and finding of potential site sensitivity for paleontological resources; and depth of potential resources if known.

6. Recommendations for any additional measures that could be necessary to avoid or reduce any adverse impacts to recorded and/or inadvertently discovered paleontological resources of scientific importance. Such measures could include:

**a. Avoidance:** If a known fossil locality appears to contain critical scientific information that should be left undisturbed for subsequent scientific evaluation.

**b. Fossil Recovery:** If isolated small, medium- or large-sized fossils are discovered during field surveys or construction monitoring, and they are determined to be scientifically significant, they should be recovered. Fossil recovery may involve collecting a fully exposed fossil from the ground surface, or may involve a systematic excavation, depending upon the size and complexity of the fossil discovery. Fossil excavations should be designed in such a way as to minimize construction delays while properly collecting the fossil and associated data according to professional paleontological standards.

**c. Sampling:** Scientifically significant microfossils (vertebrate, invertebrate, plant, or trace fossils) may be identified in rock matrix during surveys or monitoring, or, if they are known to occur elsewhere in the same geologic unit or type of deposit in the general area, a determination of their presence or absence may require the use of test sampling of rock matrix for screen-washing in a paleontological laboratory. In some cases, depending upon the geologic unit involved, test sampling may be appropriate even if microfossils are not visible in the field. The fossils found, if any, will then be inspected and evaluated to determine their significance and whether additional steps are necessary to reduce paleontological impacts. Such steps may include collection of additional matrix for screen-washing. The decision to sample may not be made until

monitoring is occurring, because it is usually triggered by conditions in the field.

**d. Monitoring:** If scientifically important paleontological resources are known to be present in an area, or if there is a moderate or high likelihood that subsurface fossils are present in geologic units or members thereof within a given project area based on prior field surveys, museum records, or scientific or technical literature, paleontological monitoring of construction excavations is required. Monitoring involves systematic inspections of graded cut slopes, trench sidewalls, spoils piles, and other types of construction excavations for the presence of fossils, and the fossil recovery and documentation of these fossils before they are destroyed by further ground disturbing actions. Standard monitoring is typically used in the most paleontologically sensitive geographic areas/geologic units (moderate, high and very high potential); while spot-check monitoring is typically used in geographic areas/geologic units of moderate or unknown paleontological sensitivity (moderate or unknown potential). The goal of monitoring is to identify scientifically significant subsurface fossils as soon as they are unearthed in order to minimize damage to them and remove them and associated contextual data from the area of ground disturbance, thereby resulting in subsurface paleontological clearance. Microfossil sampling, macrofossil recovery, and avoidance of fossils may all occur during any monitoring program.

## G1. Public Notice and Comment

On September 23, 2020 the planning department mailed a notification of project receiving environmental review to owners of properties within 300 feet of the project site, adjacent occupants, neighborhood groups, and other interested parties. Five neighborhood comments were received, including San Francisco Heritage and the Cathedral Hill Neighborhood Association and Lower Polk Neighbors, and two individual comments, both of whom requested to receive all applications and publications related to the project but did not provide comments on the project. San Francisco Heritage requested information on the historic significance of the project site, which is addressed in Section E.3, Cultural Resources, of this initial study. The Cathedral Hill Neighborhood Association and Lower Polk Neighbors requested information on aesthetics, land use, housing, traffic and parking, and shadows, which are addressed in Sections D, E.1, E.2, E.5, and E.10, respectively.

## G2. Comments Received in Response to PMND

On May 26, 2021 the planning department distributed a Notice of Availability of and Intent to Adopt a Preliminary Mitigated Negative Declaration and Initial Study. The notice was circulated to state and local agencies, interested organizations and individuals, and property owners and residents within 300 feet of the project site. Notices were also posted at multiple locations around the project site. Written comments were received from one state agency and one organization, and verbal comments were provided by one individual, summarized below:

- **Caltrans.** These comments note that several approvals would be required from Caltrans, including a transportation permit for movement of oversized or excessive load vehicles on state roadways, temporary parking, and/or travel lane closures on U.S. 101 (i.e., Van Ness Avenue), or an encroachment permit for any permanent work or temporary traffic control that encroaches on U.S. 101. These requirements are noted and would be complied with, as applicable.

  The comments also state that a Caltrans Transportation Management Plan may be required during project construction. As noted on pp. 60-61, project construction would be required to comply with the City and County of San Francisco's Regulations for Working in San Francisco Streets (the blue book), as well as other city, state, and federal codes, rules and regulations. If required, the project sponsor would comply with Caltrans requirements for a Transportation Management Plan, which is added to the list of project approvals (p. 24).

  It is also stated that Caltrans facilities must meet American Disabilities Act (ADA) standards during and after proposed project construction. Both the blue book (order 167) and public works order 840 provide guidelines for the placement of barricades at construction sites so that a safe and accessible path of travel is provided for people walking around and/or through construction sites. The proposed project would not substantially affect access during construction.

  Any proposed project changes to the adjacent street network would be designed consistent with Better Streets Plan guidelines. The Better Streets Plan creates a unified set of standards, guidelines, and implementation strategies to govern how San Francisco designs, builds, and maintains its pedestrian environment, including accessibility for all users.

- **Cathedral Hill Neighborhood Association.** The Cathedral Hill Neighborhood Association (CHNA) provided two sets of written comments: one provided in email form, and one provided in letter form. Generally, CHNA expresses opposition to the proposed project, concerns related to compliance with and requested exceptions to the governing planning code and plans applicable to the project site and surrounding area, and concerns related to the proposed changes to the adjacent street network (e.g., driveways, Hemlock Street lane configuration and vehicular circulation, and on-street curb regulations). Comments also related to the size and scale of the proposed project, including the number of residential units and parking spaces.

  The proposed project is accurately identified in Section A and summarized in Table A, p. 2. Comments related to consistency with the Van Ness Area Plan and Van Ness SUD are addressed in Section C, Compatibility with Zoning and Plans (pp. 28 through 30). As discussed, with the requested conditional use authorizations and exceptions to the planning code, the proposed project would not result in any policy inconsistencies that relate to physical environmental effects.

  With respect to the number of vehicle parking spaces, the proposed project would eliminate existing above-ground non-accessory public parking, and provide code-compliant below grade garage parking accessory to the residential and health service uses proposed. The project would provide fewer parking spaces than the maximum amount that is principally permitted under the planning code. Specifically, the proposed project would include 53 parking spaces for 107 dwelling units (less than one space per two dwelling units, which is the amount principally permitted by the planning code) and 217 parking spaces for the health service uses (representing one parking space for every 475 square feet of health service occupied floor area proposed), whereas the planning code principally permits up to 344 parking

spaces for the 103,160 square feet of occupied floor area proposed (one space for every 300 square feet of health service occupied floor area). The proposed project does not include accessory parking for the proposed general retail or restaurant uses. The proposed project therefore complies with planning code section 151.1 and would provide fewer parking spaces than principally permitted by the planning code. As part of the planning commission's approval authority, it may choose to reduce the number of parking spaces included in the proposed project.

The circulation changes on Hemlock Street, direction of on-site traffic flow between Post and Hemlock streets, and on-street curb configuration on Post Street, Hemlock Street, and Van Ness Avenue were developed in consultation with SFMTA, the public works disability access coordinator, and other City agencies that are part of the Planning Department's Street Design Advisory Team (SDAT), taking into consideration:

- the roadway network adjacent to the project site
- bicycle facilities on Polk and Post streets
- available accessible loading and paths of travel
- the number of travel lanes and type of transit service on:
  - Van Ness Avenue (transitioning to center median transit-only lanes)
  - Post Street (in transit-only lane)
  - Polk Street (in mixed-flow travel lanes)
- the proposed project's projected travel demand and proposed number of parking spaces

The project would provide four on-site service loading spaces, consistent with the planning code requirements for the number of spaces, with a planned unit development modification required for the dimensional requirements for the spaces due to the sloped nature of the site, and would also include a loading operations plan. The loading operations plan would include provisions to manage loading activities, including: off-street and on-street commercial and passenger loading activities, provisions for management of large truck access and trash/recycling/ compost collection operations, and provisions for accommodating residential move-in and move-out operations. The intent of the loading operations plan is to reduce potential conflicts between passenger and freight loading activities and people walking and bicycling, transit operations, and other vehicles, and to maximize reliance on on-site facilities to accommodate freight and passenger loading demand.

Travel demand for the health services uses was based on trip generation rates used for similar facilities (i.e., the CPMC hospital and medical office building), and account for all trips entering and exiting the facility during the p.m. peak hour. The proposed project would comply with the TDM program requirements per planning code section 169.

The commenter states that the site circulation study shows that there would be an impact on the Hemlock Alley exit due to the anticipated 106 vehicles during the p.m. peak hour; this is not accurate. The site circulation study, conducted in compliance with SF Guidelines methodology, shows 68 project-

generated p.m. peak-hour vehicles exiting Hemlock Street and turning right on Polk street. As discussed above on pages 63-64, this would not be expected to create a potentially hazardous condition because the single eastbound travel lane on Hemlock Street would have sufficient capacity, right-turning vehicle movements are safer than vehicles crossing through perpendicular vehicle and bicycle traffic, and vehicles would enter Polk Street slowly after coming to a full stop. Impacts of the proposed project on transportation and circulation were determined to be less than significant.

Comments also expressed concerns related to construction and excavation activities, including the duration of construction in relation to the size of the proposed parking garage, and resulting noise, vibration, air quality, and soils impacts. These topics are addressed in Sections E.6, Noise, and E.7, Air Quality. As discussed in the analysis, construction-period noise, vibration, and air quality impacts were determined to be less than significant with implementation of required mitigation measures. Soil stability is also addressed in Section E.15, Geology and Soils (p. 139).

Finally, related to the concerns expressed above, the commenter provides suggested alternatives to the project's proposed circulation, loading, and parking. Per CEQA Guidelines sections 15071 and 15126.6, identification and evaluation of project alternatives are not required when impacts are determined to be less than significant and a mitigated negative declaration is prepared. Comments related to the project's merits may be presented to the appropriate approving regulatory bodies (identified in Section A); however, such comments do not pertain to compliance with CEQA.

- **Unidentified Individual.** One individual left voicemail comments with the planning department on June 3, 2021. These comments expressed concerns related to wind effects, access to sunlight and increased shadow, water supply, and general construction activity in the area and along the Van Ness Avenue corridor. These topics are adequately addressed in Sections E.9, Wind, E.10, Shadow, and E.12, Utilities and Service Systems, respectively. In addition, cumulative construction-period impacts are addressed in each topics section, including E.5, Transportation and Circulation (pp. 69 through 72).

## H. Determination

On the basis of this initial study:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.

Devyani Jain
_____
Lisa Gibson
Environmental Review Officer

DATE May 26, 2021

# I. Initial Study Preparers

## Report Authors

Planning Department, City and County of San Francisco
Environmental Planning Division
1650 Mission Street, Suite 400
San Francisco, CA 94103

Environmental Review Officer: Lisa Gibson
Principal Environmental Planner: Jessica Range
Environmental Planner: Jeanie Poling
Transportation Planners: Rachel Schuett, Ryan Shum
Archeologist: Kari Lentz, Sally Morgan
Paleontology Review Coordinator: Debra Dwyer

## Environmental Consultants

LSA Associates, Inc. (Environmental Planning)
157 Park Place
Pt. Richmond, CA 94801

Principal in Charge and Project Manager: Theresa Wallace, AICP
Assistant Project Manager: Matthew Wiswell, AICP
Principal, Air Quality and Noise: Amy Fischer
Senior Planner, Air Quality and Noise: Cara Carlucci
Support Staff: Patty Linder, Beverly Inloes, Charis Hanshaw, Mirana Rideout

LCW Consulting (Transportation)
3990 20th Street
San Francisco, CA 94114

President: Luba Wyznyckyj, AICP

RWDI (Wind)
600 Southgate Drive
Guelph, ON N1G 4P6

Principal: Frank Kriksic, BES, CET, LEED AP
Project Manager: Raisa Lalui, M.Eng

## Project Sponsor

Van Ness Post Center, LLC
23 Geary Street, Suite 510
San Francisco, CA 94108

Derrick Chang

**PROJECT SPONSOR'S REPRESENTATIVE**

J. Abrams Law, P.C.
One Maritime Plaza, Suite 1900
San Francisco, CA 94111

Jim Abrams
Nick Roosevelt

**PROJECT SPONSOR'S DESIGN TEAM REPRESENTATIVE**

Woods Bagot
88 Kearny Street, Floor 19
San Francisco, CA 94108

Valentino DelRio

**PROJECT SPONSOR'S PRECONSTRUCTION CONSULTANT**

Build Group
457 Minna Street
San Francisco, CA 94103

Brian Davey