Attachment: Initial Study Checklist

INTRODUCTION

Pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15378[a], the University of California College of the Law, San Francisco's[1] (College or UC Law SF) proposed Long Range Campus Plan (LRCP) Update and 201 Golden Gate Avenue Mixed-Use Project is a "project" under CEQA. This Initial Study was prepared by PlaceWorks for the College.[2] The implementation of the proposed project is "an action [undertaken by a public agency] which has the potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment." This Initial Study was prepared pursuant to the CEQA (Public Resources Code Sections 21000 et seq.) and the CEQA Guidelines (Title 14, Section 15000 et seq. of the California Code of Regulations).

Project Title:	University of California College of the Law, San Francisco's Long Range Campus Plan Update and 201 Golden Gate Avenue Mixed-Use Project
Lead Agency Name and Address:	University of California College of the Law, San Francisco 200 McAllister Street San Francisco, CA 94102 (415) 581-8858
Location:	University of California College of the Law, San Francisco Campus and the buildings at 201, 209, 215, 243 and 247 Golden Gate Avenue in San Francisco, California
Applicant's Name and Address:	Rhiannon Bailard, Chief Operating Officer University of California College of the Law, San Francisco 200 McAllister Street San Francisco, CA 94102 (415) 581-8858
Surrounding Land Uses and Setting:	The College campus is surrounded by San Francisco's Civic Center, Mid-Market, and Tenderloin districts.
Other Required Approvals:	UC Law SF Board of Directors will certify the Final Environmental Impact Report (FEIR) and adopt the Mitigation Monitoring and Reporting Program (MMRP); UC Law SF Board of Directors will adopt the Long Range Campus Plan; future UC Law SF development projects would be reviewed in light of the FEIR and CEQA Guidelines Sections 15162, 15163, 15164, and 15168(c), to determine whether the projects' effects would require further environmental review.

[1] The University of California College of the Law, San Francisco is an affiliate of the University of California. It is not governed by the Regents of the University of California, but by its own Board of Directors appointed by the Governor.

[2] The proposed project includes the demolition and redevelopment of the buildings at 201, 209, 215, 243 and 247 Golden Gate Avenue; however, a single address is being used for the title of the proposed project.

Have California Native American Tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, has consultation begun?: The College has not received a request from any California Native American Tribes in the geographic area with which they are traditionally and culturally affiliated or otherwise to be notified about projects on the College campus.

INCORPORATED BY REFERENCE

All documents cited in this Initial Study and used in its preparation are hereby incorporated by reference into this Initial Study. Copies of documents referenced herein are available for review at the University of California College of the Law, San Francisco, 200 McAllister Street, San Francisco, CA 94102.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors listed below could be affected by the proposed project, involving at least one impact that is a potentially significant impact, as indicated by the checklist on the following pages.

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

Determination:
On the basis of this initial evaluation:

- ☐ 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 College. 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 (EIR) will be prepared.
- ☐ 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, nothing further is required.

APPROVED BY: 6/1/23

Rhiannon Bailard, Chief Operating Officer — Date

PROJECT SUMMARY

The proposed Long Range Campus Plan (LRCP) Update (LRCP Update) and the proposed 201 Golden Gate Avenue Mixed-Use Project (mixed-use development) are the two components that, when considered together, are herein referred to as the proposed project.

The first project component consists of an update to the University of California College of the Law, San Francisco's (College or UC Law SF) 2018-2023 LRCP, which represents a phased, multi-year approach to strategic planning based on relative priorities and funding availability. The proposed LRCP Update would provide a high-level planning framework to guide land use and capital investment in line with the College's mission, priorities, strategic goals, and enrollment projections. The previous LRCP established a vision for redevelopment activities to transform the College's campus into a vibrant Academic Village. The proposed LRCP Update would replace the 2018-2023 LRCP and describes the ongoing phased implementation of the Academic Village vision. The proposed update to the LRCP and the 2018-2023 LRCP are herein referred to as the proposed LRCP Update and the 2018-2023 LRCP, respectively.

Changes within the legal profession required the College to reduce its Juris Doctorate enrollment, which provided an opportunity to rethink how space is used across the College campus. To remain competitive with other law schools as a stand-alone institution and limited State allocations, the College has forged partnerships with aligned academic institutions and local organizations to leverage its downtown location in the City and County of San Francisco (San Francisco) and unique property assets to generate new sources of income to support the College's mission as a public institution of higher education. These revenue initiatives include both academic program initiatives, such as diversifying degree programs and academic offerings, and operational strategies, such as expanding campus housing and generating revenue through parking, retail leases, and event space rentals. Further, with the recent growth of online course delivery and the expanded educational access that it affords, many institutions are now focusing on virtual pathways to recruit new talent. This along with the ongoing COVID-19 pandemic has brought significant change to the higher education environment.

While embracing this new potential, the College remains committed to the construction and cultivation of the Academic Village. As part of this ongoing effort, Unite Here Local 2 (Local 2), a union of hospitality workers for San Francisco and the greater Bay Area, has granted UC Law SF an option to lease and participate in development of the Union's property at 201, 209, 215, 243, and 247 Golden Gate Avenue. This proposed mixed-use development is the second component of the proposed project and the

construction and operation of this new building represents the buildout potential of the proposed LRCP Update. The proposed mixed-use development would replace a group of low-rise buildings with a new mixed-use structure of up to 153 feet (approximately 14 stories), expanding the College's footprint by a quarter of a city block. This project component would anchor the northeast corner of the campus and provide new offices and meeting space for Local 2, academic/programmatic space (which could include limited retail), and campus housing potentially for students, staff, and/or faculty for the College and/or partner institutions.

The College has developed two conceptual scenarios (variants) for the proposed mixed-use development, referred to as Academic Light (Variant 1) and Academic Heavy (Variant 2). In both scenarios, the 201 Golden Gate Avenue Mixed-Use Project would involve the demolition of the existing on-site buildings, and the construction and operation of a new single building, with a mix of uses dedicated to academic/programmatic space, campus housing, and space for Local 2's operations and functions, including a hiring hall. As the names of the variants imply, the Academic Light Variant minimizes academic/programmatic space and maximizes the campus housing unit count, while the Academic Heavy variant maximizes the academic/programmatic space and minimizes the campus housing unit count. In both variants, the square footage for the portion of the building dedicated to the Local 2 facilities would be approximately 42,000 gross square feet. In addition, under both variants the basement level would be accessible through the alley on the southeastern edge of the site (adjacent to 100 McAllister), and would host building support functions such as primary mechanical and electrical rooms as well as 20 parking spaces (dedicated to Local 2), servicing and receiving space, building storage space, elevator access, and central trash and recycling.

A summary of the two variants is as follows:

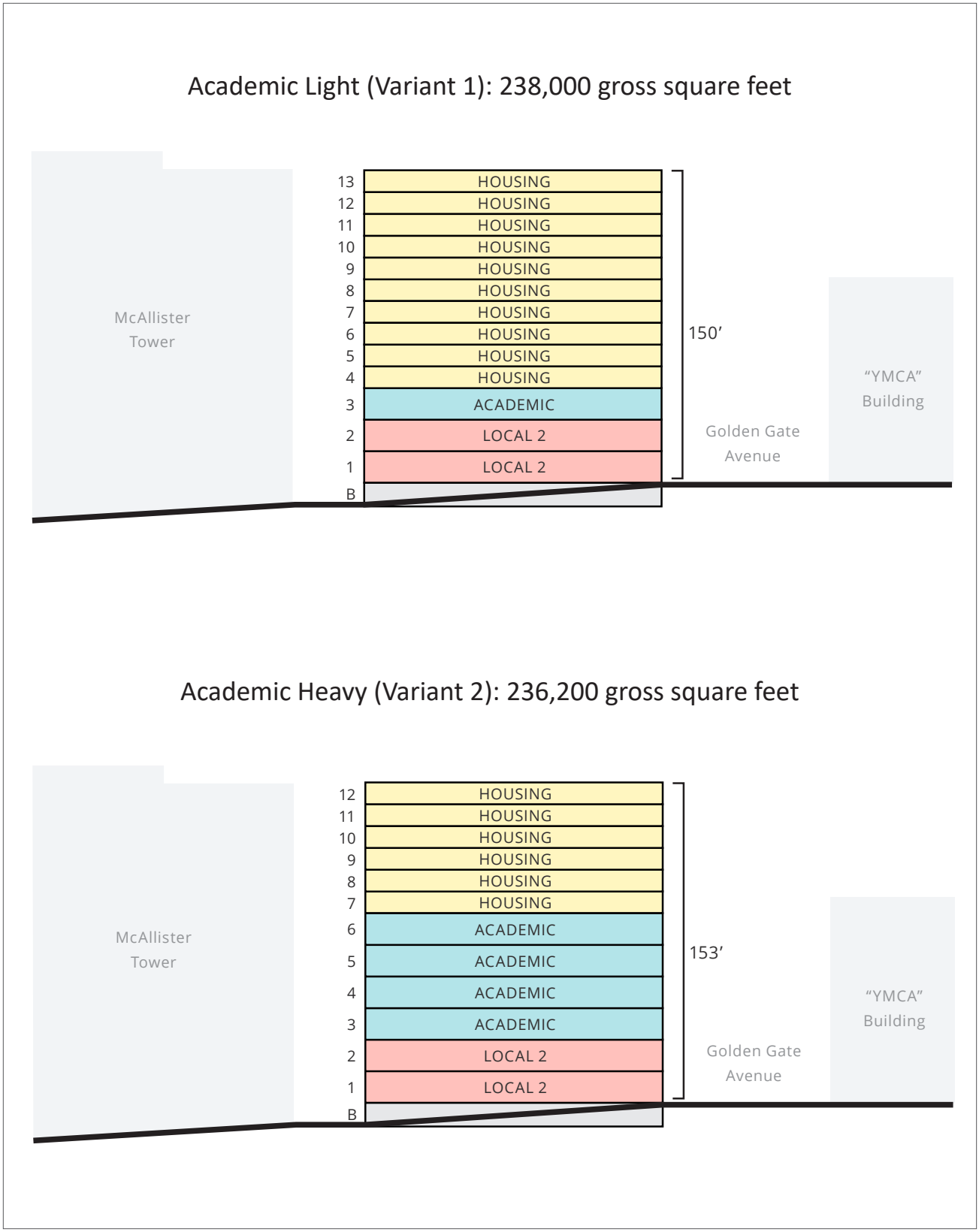
- Academic Light (Variant 1). This variant minimizes the space of the academic/programmatic spaces and maximizes campus housing unit count. The new multi-use tower would consist of an estimated 238,000 total gross square feet (gsf). This variant would include two floors for Local 2, one floor of academic/programmatic space, ten floors of campus housing, and a basement level with parking, storage and building support spaces. The conceptual program estimates that housing floors would total approximately 155,550 gsf, which could include up to 394 units. The academic/programmatic space would total approximately 19,450 gsf.
- Academic Heavy (Variant 2). This variant maximizes the academic/programmatic space and minimizes campus housing. The new multi-use tower would consist of an estimated 236,200 total gsf. This variant would include two floors for Local 2, four floors of academic/programmatic space, six floors of campus housing, and a basement level with parking, storage and building support spaces. The conceptual program estimates that housing floors would total 92,550 gsf, which could include up to 233 units. The academic space would total approximately 80,650 gsf.

Table 1, *Project Summary*, summarizes the development details for each variant. Figure 1, *Conceptual Building Plan*, shows the number of stories, building height, and square footage for each project variant. Renderings of the variants are provided in Figure 2, *Exterior Renderings*.

TABLE 1 PROJECT SUMMARY

	Academic Light (Variant 1)	Academic Heavy (Variant 2)
Housing Units	394	233
Residents [a]	831	492
Employees and Daily Visitors [b]	453	907
Total Gross Square Footage	238,000	236,200
Housing	155,550	92,550
Local 2	41,750	41,750
Academic/Programmatic	19,450	80,650
Basement/Systems/Parking	21,250	21,250
Parking Spaces	20	20
Total Number of Stories	13	12
Building Height	150	153

Notes:
a. Number of residents calculated based on 2.11 residents per unit (based on average household size for San Francisco, Department of Finance, 2023)
b. Number of employees and daily visitors based on the San Francisco Public Utilities Commission's Single Site Non-Potable Water Calculator, https://www.sfpuc.org/documents/single-building-water-use-calculator, accessed May 5, 2023.
Source: Page Southerland Page, 2023.



Source: Page Southerland Page, 201 Golden Gate Concept Design Page, 2023.

Figure 1
Conceptual Building Plan

Academic Light (Variant 1)

Academic Heavy (Variant 2)

Source: Page Southerland Page, 201 Golden Gate Concept Design Page, 2023.

Figure 2
Exterior Renderings

ENVIRONMENTAL ANALYSIS

For each impact identified in this section, a level of significance is determined using the following classifications:

- Potentially Significant Impact is appropriate if there is substantial evidence that an effect may be significant. This category includes those impacts that can be mitigated to a less-than-significant level. These topics will be addressed in the EIR.
- Less than Significant Impact applies when there is no substantial evidence that an effect may be significant. These topics will not be addressed in the EIR.
- No Impact applies when a project would not create an impact of any kind. These topics will not be addressed in the EIR.

The EIR will analyze those impacts identified as potentially significant impacts by this Initial Study, including an analysis of whether mitigation measures can be implemented to reduce those potential impacts to a less-than-significant-level. Additionally, the EIR will evaluate the CEQA-required "No Project Alternative" as well as least one additional alternative that will focus on reducing potential significant impacts identified in the EIR.

I. AESTHETICS

Except as provided in Public Resources Code Section 21099 (transit priority area/major transit stop), would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
a) Have a substantial adverse effect on a scenic vista?	❒	❒	■
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	❒	❒	■
c) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	❒	❒	■
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	❒	❒	■

DISCUSSION

a), b), c), and d) California Public Resources Code (PRC) Section 21099, commonly referred to by its legislative bill number, Senate Bill 743, passed in 2013, made changes to CEQA for projects located in transit-oriented development areas. Among these changes are that a project's aesthetics impacts can no longer be considered an impact on the environment if the project is a residential, mixed-use residential, or employment center project and if the project is located on an infill site within a transit priority area (TPA).[3] The proposed LRCP Update, which includes the proposed mixed-use development, qualifies as a mixed-use residential project as each variant includes a combination of residential units with academic/programmatic uses and other office uses. The project site also qualifies as an infill site, which is

[3] California Legislative Information, 2013, Senate Bill No. 743, Chapter 386, http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB743&search_keywords=, accessed July 9, 2022.

defined as a lot located within an urban area that has been previously developed or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. The site is currently developed with a group of low-rise buildings. Surrounding uses include the Kelly Cullen Community apartment building to the north on the opposite side of Golden Gate Avenue; non-residential uses to the east on the opposite side of Leavenworth Avenue; McAllister Tower, which is proposed to be renovated with residential mixed-use starting in 2024, to the south at 100 McAllister Street; and non-residential uses to the west on Golden Gate Avenue.

The Association of Bay Area Government (ABAG) and Metropolitan Transportation Commission (MTC) are regional planning agencies tasked with coordinating land use and transportation planning in the Bay Area, including development of the Bay Area's Regional Transportation Plan/Sustainable Communities Strategy, known as *Plan Bay Area*. According to ABAG and MTC, the project site is in a Transit Priority Area.[4] Accordingly, in compliance with PRC Section 21099, aesthetic impacts are not considered significant impacts for purposes of this environmental analysis. Therefore, there would be *no impact* and this topic will not be addressed in the EIR.

II. AGRICULTURE AND FORESTRY RESOURCES

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), 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, forestland (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 conversion of forest land to non-forest use?	❒	❒	■

[4] Association of Bay Area Governments and Metropolitan Transportation Commission Open Data "Transit Priority Area (2021)" feature set that contains the Transit Priority Areas in the nine-county San Francisco Bay Region as defined in the California Public Resources Code Section 21099. https://opendata.mtc.ca.gov/maps/370de9dc4d65402d992a769bf6ac8ef5, accessed February 17, 2023.

DISCUSSION

a), b), c), d), and e) Maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency have no information available for land within San Francisco.[5] In addition, according to the San Francisco Planning Zoning Use Districts that were updated in February 2023, San Francisco does not contain land zoned for agriculture or timberland production.[6] Therefore, there would be *no impacts* and this topic will not be addressed in the EIR.

III. AIR QUALITY

Would the proposed project:		Potentially Significant Impact	Less than Significant	No Impact
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 in non-attainment under applicable federal or State ambient air quality standard?	■	❒	❒
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?	❒	■	❒

DISCUSSION

a) The Bay Area Air Quality Management District (BAAQMD) has identified thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including reactive organic gases (ROG), nitrogen oxides (NO_x), coarse inhalable particulate matter (PM_{10}), and fine inhalable particulate matter ($PM_{2.5}$). The proposed mixed-use development would involve the construction and subsequent occupancy of a mixed-use project with multi-family residential units, academic/programmatic space, and office and meeting space for Local 2. Therefore, there would be a *potentially significant* impact related to construction and operation of the mixed use development and this standard of significance will be addressed in the EIR.

b) The San Francisco Bay Area Air Basin (SFBAAB) is currently designated as a nonattainment area for California and National ambient air quality standards (AAQS) for ozone (O_3) and for $PM_{2.5}$, and a nonattainment area under the California AAQS for PM_{10}.[7] As discussed in standard of significance (a), the proposed mixed-use development would involve the construction and subsequent occupancy of new residential units as well as new construction of academic or community-serving programmatic space.

[5] California Resources Agency, California Important Farmland Finder, https://maps.conservation.ca.gov/dlrp/ciff/app/ , accessed on March 8, 2023.

[6] San Francisco Planning, Zoning Use Districts, February 2023, https://sfplanninggis.s3.amazonaws.com/hub/BIGmap.pdf accessed on March 8, 2023.

[7] California Air Resources Board, Maps of State and Federal Area Designations, https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations, accessed on March 8, 2023.

Therefore, there would be a *potentially significant* impact and this standard of significance will be addressed in the EIR.

c) The project site is located in a mixed-use neighborhood with several receptors sensitive to air pollution (e.g., residential and educational properties), including the Kelly Cullen Community Apartments to the north, De Marillac Academy (a non-residential school) to the east, The Academe at 198 campus housing and academic/programmatic and retail space to the southwest, the Lofts at Seven Apartments to the west, and others. Therefore, project construction emissions could potentially impact these on-site and adjacent air-quality sensitive receptors. Accordingly, the impacts under this standard of significance and the need and nature of any required mitigation should be identified as part of the EIR to protect sensitive receptors from risks associated with the levels of pollution associated with construction on the project site. Therefore, there would be a *potentially significant* impact and this standard of significance will be addressed in the EIR.

d) Construction and operation of the proposed mixed-use development would not generate substantial odors or be subject to odors that would affect a substantial number of people. The type of facilities that are considered to have objectionable odors include wastewater treatments plants, landfills, confined animal facilities, composting stations, food manufacturing plants, refineries, and chemical plants.[8]

Potential impacts could occur if new sources of nuisance odors are placed near sensitive receptors. Table 2, *BAAQMD Odor Screening Distances*, identifies screening distances from potential sources of objectionable odors within the SFBAAB. Odors from these types of land uses are regulated under BAAQMD Regulation 7, Odorous Substances.

TABLE 2 BAAQMD ODOR SCREENING DISTANCES

Land Use/Type of Operation	Screening Distance
Wastewater Treatment Plan	2 miles
Wastewater Pumping Facilities	1 mile
Sanitary Landfill	2 miles
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plan	2 miles
Chemical Manufacturing	2 miles
Fiberglass Manufacturing	1 mile
Painting/Coating Operations	1 mile
Rendering Plant	2 miles
Coffee Roaster	1 mile
Food Processing Facility	1 mile
Confined Animal Facility/Feed Lot/Dairy	1 mile

[8] Bay Area Air Quality Management District, Air Quality Guidelines, Bay Area Air Quality Management District, 2023, California Environmental Quality Act Air Quality Guidelines, https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-5-project-air-quality-impacts_final-pdf.pdf?la=en, accessed April 28, 2023.

TABLE 2 BAAQMD ODOR SCREENING DISTANCES

Land Use/Type of Operation	Screening Distance
Green Waste and Recycling Operations	1 mile
Metal Smelting Plants	2 miles

Source: Bay Area Air Quality Management District, 2023, California Environmental Quality Act Air Quality Guidelines, Table 5-4, Odor Screening Distances, https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-5-project-air-quality-impacts_final-pdf.pdf?la=en, accessed April 28, 2023.

The proposed mixed-use development would not generate substantial odors that would affect a substantial number of people. It does not include projects that fall under the categories listed in Table 2. During operation, meal preparation spaces could generate odors from cooking, but such odors are not substantial enough to be considered nuisance odors that would affect a substantial number of people. Furthermore, nuisance odors are regulated under BAAQMD Regulation 7, Odorous Substances, which requires abatement of any nuisance generating an odor complaint. BAAQMD's Regulation 7, Odorous Substances, places general limitations on odorous substances and specific emission limitations on certain odorous compounds.[9] In addition, odors are regulated under BAAQMD Regulation 1, Rule 1-301, Public Nuisance. Compliance with BAAQMD Regulation 7 would ensure that odor impacts are minimized; therefore, there would be a *less-than-significant* impact and this standard of significance will not be addressed in the EIR.

IV. BIOLOGICAL RESOURCES

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
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 plan, 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?	❒	❒	■

[9] It should be noted that while restaurants can generate odors, these sources are not identified by BAAQMD as nuisance odors since they typically do not generate significant odors that affect a substantial number of people. Larger restaurants that employ five or more people are subject to BAAQMD Regulation 7, Odorous Substances.

DISCUSSION

a), b), and c) The project site is fully covered with impervious surfaces and is located within a built urban environment. While there are street trees around the property, the project site does not provide any habitat for rare or endangered plant species or include riparian habitat or other sensitive natural communities as defined by the California Department of Fish and Wildlife and the United States Fish and Wildlife Service; the project site also does not contain any wetlands as defined by Section 404 of the Clean Water Act. Therefore, there would be *no impact* and these standards of significance will not be addressed in the EIR.

d) Migratory birds may travel through San Francisco and the project site. Migratory birds could be impacted from the construction and operation of the site by altering the vegetation on the project site and through the types of building materials.

The street trees on the project site could provide habitat for migratory birds that could be disturbed during the construction phase of the proposed mixed-use development. In addition to either maintaining the existing street trees or replacing them if maintenance is not possible, the proposed mixed-use development would plant new street trees and other landscaping vegetation, providing additional refuge for birds. As part of the College's ongoing implementation of its Green Community Benefits Plan (GCBP) that was established in 2020, the GCBP will guide the equitable mitigation of the associated construction impacts, replacing removed mature street trees at a 3:1 ratio and continuously directing funds to future neighborhood greening proposals. Proposed Migratory birds, nesting birds, their nests, and eggs are fully protected by California Fish and Game Code (Sections 3503, 3503.5) and the federal Migratory Bird Treaty Act. The proposed mixed-use development would be subject to the Migratory Bird Treaty Act. The location, height, and material of buildings may present risks for birds as they travel along their migratory paths. However, the project site is located in a highly urbanized environment and is not located in an Urban Bird Refuge[10].

In summary, the proposed mixed-use development would not interfere with the movement of native resident or wildlife species or with established native residents or migratory wildlife corridors as described in this section. This impact would be *less than significant* and this standard of significance will not be addressed in the EIR.

e) UC Law SF projects are exempt from local governments' regulations. However, College development projects that require changes in sidewalks or street trees under the jurisdiction of the San Francisco Department of Public Works would be subject to Article 16 of the San Francisco Public Works Code, the Urban Forestry Ordinance, which provides for the protection of landmark, significant, and street trees. Development under the proposed LRCP Update could potentially entail the removal of street trees. The removal of street trees would result in a less-than-significant impact, and Article 16 policies would require replacement or addition of street trees as part of development. The proposed mixed-use development would maintain the existing street trees to the extent feasible, or replace them if maintaining them is not feasible, and add street trees and other landscaping on-site to tie into San Francisco's overall plan for

[10] Defined by the Planning Code as "open spaces two acres and larger dominated by vegetation, including vegetated landscaping, forest, meadows, grassland, or wetlands, or open water." (San Francisco Planning Code section 139(c)(1).)

street trees. The proposed design of the proposed mixed-use project would not include the net loss of trees and, therefore, there would be *no impact*.

f) The project site is not located within a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, there would be *no impact* to any local, regional, or state habitat conservation plans and this topic will not be addressed in the EIR.

V. CULTURAL RESOURCES

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	■	❒	❒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	■	❒	❒
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	❒	■	❒

DISCUSSION

a) and b) Due to the project site being located in the National Register-listed Upper Tenderloin Historic District, a Historic Resources Technical Report will be prepared for the project site.[11] The report will analyze the potential impacts caused by the demolition of the current buildings and identify any individual historic resources on the project site. This information gathered from the report will be used to determine the significance level and appropriate mitigation, if any, required; Therefore, there would be a *potentially significant* impact and this standard of significance will be addressed in the EIR.

c) In the event of the discovery of any human remains on the project site during construction, procedures will follow all applicable State standards. The procedures of conduct following the discovery of human remains are mandated by Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98 and the California Code of Regulations Section 15064.5(e) (CEQA). According to the provisions in CEQA, if human remains are encountered at the site, all work in the immediate vicinity of the discovery shall cease and necessary steps to ensure the integrity of the immediate area shall be taken. The San Francisco County Coroner shall be notified immediately. The Coroner shall then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner shall notify the NAHC within 24 hours, who will, in turn, notify the person the NAHC identifies as the Most Likely Descendant (MLD) of any human remains. Further actions shall be determined, in part, by the desires of the MLD. Through compliance with these existing regulations, human remains will be disturbed in the least way possible. Therefore, there would be a *less-than-significant* impact and this standard of significance will not be addressed in the EIR.

[11] National Archives Catalog, California SP Uptown Tenderloin Historic District, https://catalog.archives.gov/id/123861345, accessed on February 27, 2023.

VI. ENERGY

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
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?	❒	■	☐

DISCUSSION

a) The proposed mixed-use development would generate energy demand during construction and operation. As described below, the project would not result in energy consumption that is wasteful, inefficient, or unnecessary.

Short-term Construction Impacts

Construction of the proposed mixed-use development would create temporary increased demands for electricity and vehicle fuels from demolition of the existing buildings and construction of the new building.

Electrical Energy

Construction of the proposed mixed-use development would not require electricity to power most construction equipment. Electricity use during construction would vary during different phases of construction. The majority of construction equipment during demolition and grading would be gasoline- or diesel-powered, and the later construction phases would primarily require electric-powered equipment for finishing and architectural coatings. It is anticipated that the majority of electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which would result in minimal electricity usage during construction activities. Overall, the use of electricity would be temporary and would fluctuate according to the phase of construction and would not represent wasteful or unnecessary use of electricity.

Liquid Fuels and Transportation Energy

Transportation energy use depends on the type and number of trips, vehicle miles traveled (VMT), fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel and/or gasoline. The use of energy resources by these vehicles would fluctuate according to the phase of construction and would be temporary. It is anticipated that the majority of off-road construction equipment, such as those used during grading, would be gasoline- or diesel-powered.

Use of construction equipment would cease upon completion of the proposed mixed-use development. Thus, impacts related to transportation energy use during construction would be temporary and would

not require expanded energy supplies or the construction of new infrastructure. Furthermore, to limit wasteful and unnecessary energy consumption, the construction contractors are anticipated to minimize nonessential idling of construction equipment during construction, in accordance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9. Construction trips would also not result in unnecessary use of energy since the project site is centrally located and is served by numerous regional roadways (e.g., Interstate 80, US 101) that provide direct routes from various areas of the region. Moreover, electrical energy would be available for use during construction from existing power lines and connections, either precluding or minimizing the use of less efficient liquid fueled generators. Thus, energy use during construction of the project would not be considered inefficient, wasteful, or unnecessary.

Long-term Operation Impacts

Operation of the proposed mixed-use development would create additional demands for electricity and would result in increased transportation energy use compared to existing conditions. The proposed mixed-use development may involve the use of natural gas.

Building Energy

Existing buildings on the project site generate energy demand from operation (heating, air conditioning and ventilation systems, lighting, use of appliances, and other site features that require electric power) and from transportation to and from the project site. The operation of the proposed mixed-use development would consume more electricity from similar uses and new uses such as elevators and electric vehicle (EV) charging, and may involve the use of natural gas. The proposed utility infrastructure would connect to the existing water, sewer, storm drain, natural gas, and electricity networks in the area, and would be served by an existing solid waste landfill. Electrical and/or natural gas service to the proposed mixed-use development would be provided by Pacific Gas and Electric (PG&E) or CleanPowerSF, the local community's Community Choice Aggregator, through existing off-site electrical lines and new on-site infrastructure.

While the proposed mixed-use development would result in a greater energy demand than the existing on-site buildings, it would be consistent with the requirements of the 2022 Building and Energy Efficiency Standards of the California Public Resources Code, Title 24, Part 6, which applies to any project whose permit applications are applied for on or after January 1, 2023. The 2022 Building Energy Efficiency Standards improve upon the 2019 Standards. The 2022 Standards require more energy efficiency for residential and non-residential buildings.[12] The proposed mixed-use development would also be consistent with the requirements of the California Green Building Standards Code (Part 11, Title 24, known as "CALGreen"). CALGreen was adopted as part of the California Building Standards Code to apply to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure, unless otherwise indicated in the California Building Standards Code, throughout the State of

[12] California Energy Commission, December 2021. 2022 Building Energy Efficiency Standards, https://www.energy.ca.gov/publications/2022/2022-building-energy-efficiency-standards-residential-and-nonresidential, accessed January 24, 2023.

California.[13] CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation requiring new buildings to reduce water consumption by 20 percent, material conservation, and internal air contaminants. The electricity consumed by the proposed mixed-use development would be increasingly sourced from renewable generation sources in future years. This is because both PG&E and CleanPowerSF are required under Senate Bill (SB) 100 as Load Serving Entities (LSEs) to incorporate greater proportions of renewable generation sources in their electricity procurement through the year 2045, until electricity procured for in-state sales are ultimately sourced from 100 percent carbon-free sources by January 1, 2046. In addition, the proposed mixed-use development would include energy saving features such as photovoltaic solar arrays on the rooftop, energy efficient and water conservation appliances, and would achieve Leadership in Energy & Environmental Design (LEED). LEED is a green building certification program that recognizes best-in-class building strategies and practices that reduce consumption energy and water, and reduce solid waste directly diverted to landfills. LEED certified buildings are ranked in order of efficiency from Certified, Silver, Gold, and Platinum being the highest ranking with the greatest efficiency standard. Currently, the College is aiming for the LEED Gold standard. Therefore, operation of the proposed new building would not constitute wasteful, inefficient, or unnecessary energy consumption and would not result in a significant impact related to energy.

Transportation Energy

The project would consume transportation energy during operations from the use of motor vehicles. The efficiency, such as the average miles per gallon, of these motor vehicles is expected to improve over time as fuel economy standards increase under Statewide and National regulations, such as the National Highway Traffic Safety Administration's Corporate Average Fleet Economy (CAFE) rule.

As discussed in Section XIV, *Population, and Housing*, the proposed mixed-use development would create up to 394 units of new campus housing that could bring up to 831 new residents in the area. The proposed mixed-use development is intended to accommodate the existing educational and partner institution populations in the project vicinity, as the project is expected to be occupied by students, staff, and/or faculty who already reside, work, and/or study in San Francisco and the Bay Area region. Therefore, while the proposed mixed-use development would add new parking for use by Local 2 employees and for deliveries/moving trucks, it would provide housing in a transit rich area. New residents introduced by the proposed mixed-use development and visitors to the campus are expected to use a combination of privately owned vehicles (parked off site) and transit and pedestrian infrastructure to travel around the area. The San Francisco Municipal Transportation Agency (SFMTA) operates a bus line and light rail route with frequent stops along Market Street, which along with the Civic Center BART station are less than one-quarter mile from the project site. Close proximity to these transit facilities would facilitate reductions in per capita VMT generation as well as encourage active and alternative modes of transportation by future campus residents accommodated by the proposed mixed-use development.

[13] California Code of Regulations, Title 24, Part 11, January 1, 2020, California Green Buildings Standards Code, https://codes.iccsafe.org/content/CAGBSC2019/copyright.

Moreover, with the California Air Resources Board's (CARB) adoption of the Advanced Clean Fleets (ACF) rule in October 2022, the proportion of passenger vehicles sold and operated in California being zero-emission will increase through 2035. According to the ACF rule, manufacturers must ensure that 10 percent of their light-duty passenger vehicles sold in the State are zero-emission by 2025, 25 percent by 2028, 50 percent by 2031, 75 percent by 2033, and 100 percent by 2035. Vehicle categories other than light-duty passenger vehicles have different benchmark years for eventually achieving the 100-percent zero-emission goal. For instance, under the ACF rule, medium- and heavy-duty on-road vehicles must be 100-percent zero-emission by 2040 and heavy-duty off-road vehicles must be 100-percent zero-emission by 2045. It is important to note that this does not preclude the use of gasoline- or diesel-fueled vehicles after those benchmark years; however, implementation of the ACF rule will facilitate an accelerated adoption of EVs in the State in future years.

In addition, as EVs constitute a larger proportion of the proposed operational vehicle fleet in future years, the electricity consumed by these vehicles will be sourced from increasingly renewable and carbon-free sources as LSEs are required to meet the incremental increases in procurement requirements under the State Renewable Portfolio Standard (RPS). As previously stated, SB 100 accelerated the State RPS to include the 2045 requirement of 100 percent of in-state electricity sales being sourced from renewable and carbon-free sources. Therefore, it is expected that over time residents accommodated by the proposed mixed-use development would increasingly drive EVs, consuming electricity that is increasingly sourced from renewable and carbon-free sources, and cars that consume fewer fossil fuels. However, even the fossil fuel consumption that would occur soon after project completion would be necessary for residents to travel to and from the project site to attend classes and meet other school and employment responsibilities. Therefore, the transportation energy consumption that would occur because of the proposed mixed-use development would not be wasteful, inefficient, or unnecessary.

Summary

Electricity and liquid fuels used during construction and operation of the proposed mixed-use development would not be considered inefficient, wasteful, or unnecessary. Therefore, there would be a *less-than-significant* impact and this standard of significance will not be addressed in the EIR.

b) The State's electricity grid is transitioning to renewable energy under California's RPS Program. Eligible renewable sources of electricity under the State RPS include wind, small hydropower, solar, geothermal, biomass, and biogas. Electricity production from renewable sources is generally considered carbon neutral. Executive Order S-14-08, signed in November 2008, expanded the State RPS to 33 percent renewable power by 2020. On September 10, 2018, SB 100 was signed into law, which accelerated the RPS to require public owned facilities and retail sellers to use 44 percent renewable electricity by 2024, 52 percent by 2027, and 60 percent by 2030. SB 100 also established a State policy that eligible renewable resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies no later than December 31, 2045. Under SB 100, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target. SB 1020 was signed into law on September 16, 2022, which further accelerated the State RPS to require renewable electricity and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035 and 95 percent by 2040.

Additionally, SB 1020 accelerated the requirement for State agencies to utilize electricity that is 100 percent sourced from renewable and zero-carbon resources by 2035.

The State RPS program is not directly applicable to individual development projects, but to utilities and energy providers such as PG&E and CleanPowerSF, which are the utilities that would provide all of the energy needs for the proposed mixed-use development. As of 2021, 93 percent of PG&E's electricity is generated from greenhouse gas (GHG)-free sources, including renewables, nuclear and large hydroelectric power.[14] Meanwhile, CleanPowerSF's energy comes from a variety of renewable sources such as solar, wind, hydroelectric and geothermal. CleanPowerSF offers a baseline Green option to customers that provides 50 percent renewable energy and a SuperGreen option that provides customers 100 percent renewable energy.[15] PG&E's and CleanPowerSF's required compliance with the RPS goals would facilitate the State's objective to transition to a renewable and climate conscious electricity grid. The net increase in energy demand associated with implementation of the proposed mixed-use development would be within the service capabilities of existing LSEs because growth and consumption forecasts resulting from development of areas, such as San Francisco which includes the proposed project, are captured in coordinated grid management plans developed by the California Independent System Operator (CAISO). The proposed mixed-use development, therefore, would not result in PG&E or CleanPowerSF not being able to meet the State RPS requirements. In addition, the proposed mixed-use development also would comply with the latest Building Energy Efficiency Standards and CALGreen, and would be LEED Certified. As previously stated, the College is currently aiming for the LEED Gold standard, if feasible. The proposed mixed-use development would also be required to comply with relevant EV charging standards in CALGreen. Therefore, the proposed project would not result in wasteful, inefficient, or unnecessary energy consumption; this impact would be *less than significant*, and this standard of significance will not be addressed in the EIR.

VII. GEOLOGY AND SOILS

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
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?	■	❒	❒
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 a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	■	❒	❒

[14] PG&E, Exploring Clean Energy Solutions, https://www.pge.com/en_US/about-pge/environment/what-we-are-doing/clean-energy-solutions/clean-energy-solutions.page?WT.mc_id=Vanity_cleanenergy, accessed on March 27, 2023.

[15] CleanPowerSF, Residential Rates, https://www.cleanpowersf.org/residential, accessed on April 4, 2023.

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
d) Be located on expansive soil, as defined by 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 waste water disposal systems where sewers are not available for the disposal of wastewater?	❒	❒	■
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	❒	■	❒

DISCUSSION

a) and c) As described below, while the proposed project would not directly or indirectly cause potential substantial adverse effects including the risk of loss, injury or death from a seismic event in the project area from fault rupture and landslides due to its location, the College is in an area subject to risk of seismic events and is in the process of preparing a project-specific geotechnical report for the proposed mixed-use development. There would be a *potentially significant* impact related to construction and operation of the proposed mixed-use development and this standard of significance will be addressed in the EIR.

Fault Rupture

No active faults are known to traverse the site and there is no identified fault-rupture hazard zone as defined by the Alquist-Priolo Special Studies Zones Act within the project site, so the risk of surface fault rupture is considered low. Additionally, the proposed mixed-use development is on a flat, already developed site, and would conform to building and safety standards, such as those within the California Building Code (CBC).

Strong Seismic Ground Shaking

The hazards posed by strong seismic ground shaking during a major earthquake, while variable, are nearly omnipresent in the San Francisco Bay Area. According to the U.S. Geological Survey (USGS), the overall probability of a magnitude 6.7 or greater earthquake to occur in the San Francisco Bay Region during the next 30 years is 63 percent. Therefore, it is possible that a strong earthquake would affect the proposed mixed-use development 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. In the event of a strong, magnitude 6.7 or greater seismic event, much of San Francisco is projected to experience ground shaking, as it is roughly 10 miles west of the San Andreas fault. Adherence to the CBC would be required to ensure that the impacts associated with strong seismic ground shaking are minimized to the maximum extent practicable. However, site-specific geotechnical analysis is currently being prepared to evaluate the impacts of the proposed mixed-use development related to strong seismic ground shaking and this topic will be included in the EIR.

Liquefaction

The project site is within the San Francisco North 7.5 Minute Quadrangle Seismic Hazard Zone map and is in an area designated as susceptible to liquefaction. However, as described under the discussion for strong seismic shaking, the proposed new building would be constructed pursuant to the standards set forth in the CBC which would ensure that the impacts associated with liquefaction from strong seismic shaking would be minimized to the maximum extent practicable. As previously stated, site-specific geotechnical analysis is currently being prepared to evaluate the impacts of the proposed mixed-use development related to liquefaction and this topic will be included in the EIR.

Landslides

Landslides are a type of erosion in which masses of earth and rock move down slope as a single unit. Susceptibility of slopes to landslides and lurching (earth movement at right angles to a cliff or steep slope during ground shaking) depend on several factors that are usually present in combination—steep slopes, condition of rock and soil materials, presence of water, formational contacts, geologic shear zones, and seismic activity. The project site is within a developed area of San Francisco with a gentle slope towards the southeast. In the absence of significant ground slopes, the potential for landslides is considered negligible. Therefore, impacts associated with project development related to seismically induced landslides would be *less than significant*.

Subsidence

The project site is not included in a USGS area of known land subsidence.[16] In addition, the project site is in a populous area in which local water districts regularly monitor groundwater levels and, because of this, the project site is not likely to be subject to significant groundwater changes that can lead to subsidence. As previously stated, site-specific geotechnical analysis is currently being prepared to evaluate the impacts of the proposed mixed-use development related to land subsidence and this topic will be included in the EIR.

Collapse

Collapsible soils have weakly bonded cement structures holding the soil together that break down when water is applied. The project site is located atop artificial fill[17] which is not likely to be collapsible. However, the proposed new mixed-use development would be constructed pursuant to the standards set forth in the CBC would ensure that the impacts associated with collapse from strong seismic shaking would be minimized to the maximum extent practicable. Nonetheless, a site-specific geotechnical analysis is currently being prepared to evaluate the impacts of the proposed mixed-use development related to collapsible soils and this topic will be included in the EIR.

[16] United States Geological Survey, Areas of Land Subsidence in California, https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html, accessed May 1, 2023.

[17] Knudsen, K. L., et al., 1997, Quaternary Geology and Liquefaction Susceptibility Maps, San Francisco, California 1:100,000 Quadrangle, U.S. Geological Survey 97-715, scale 1:100,000.

b) Substantial soil erosion or loss of topsoil during construction could, in theory, undermine the proposed new structure and minor slopes during development of the project site. As described in Section X, *Hydrology and Water Quality*, the area of disturbance for the proposed new building is approximately 0.60 acres. Therefore, since the project would disturb less than one acre of land, it is not subject to the requirements of the State Water Resources Control Board's General Construction Permit, which regulates sites that disturb one acre or more. However, compliance with existing regulatory requirements, such as the implementation of grading erosion control measures specified in the CBC, would reduce impacts from erosion and the loss of topsoil. Examples of these control measures are best management practices such as hydroseeding or short-term biodegradable erosion control blankets; vegetated swales, silt fences, or other forms of protection at storm drain inlets; post-construction inspection of drainage structures for accumulated sediment; and post-construction clearing of debris and sediment from these structures. Therefore, the impacts would be *less than significant,* and this standard of significance will not be discussed in the EIR.

d) Expansive soils can undergo dramatic changes in volume in response to variations in soil moisture content. When wet, these soils can expand; conversely, when dry, they can contract or shrink. Sources of moisture that can trigger this shrink-swell phenomenon can include seasonal rainfall, landscape irrigation, utility leakage, and/or perched groundwater. Expansive soil can develop wide cracks in the dry season, and changes in soil volume have the potential to damage concrete slabs, foundations, and pavement. Special building/structure design or soil treatment are often needed in areas with expansive soils.

The proposed mixed-use development would be subject to the CBC regulations and provisions. The CBC contains specific requirements for seismic safety, excavation, foundations, retaining walls, and site demolition, and also regulates grading activities, including drainage and erosion control. Thus, compliance with existing regulations and policies would ensure that the potential future development impacts permitted under the proposed project would be reduced. As previously stated, site-specific geotechnical analysis is currently being prepared to evaluate the impacts of the proposed mixed-use development related to expansive soils and this topic will be included in the EIR.

e) The development of the proposed mixed-use development would not require the construction or use of septic tanks or alternative wastewater disposal systems. Wastewater generated by the proposed mixed-use development would be conveyed to the existing municipal sanitary sewer system in San Francisco with existing connections to the sanitary sewer system on Golden Gate Avenue or Leavenworth Street. Therefore, *no impact* would occur, and this standard of significance will not be discussed in the EIR.

f) As described in previous discussions in this section, the project site is underlain by artificial fill material, which generally consists of gravel, sand, silt, clay, rock fragments, organic matter, and man-made debris in various combinations. As such, the geology and soils on the project site are common throughout San Francisco and region and are not considered to be unique.

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. Paleontological resources are lithologically dependent; that is, deposition and preservation of paleontological resources are related to the lithologic unit in which they occur. If the rock

types representing a deposition environment conducive to deposition and preservation of fossils are not favorable, fossils will not be present. Lithological units that may be fossiliferous include sedimentary formations. Because the project site is underlain by artificial fills and not sedimentary formations, the soils do not contain paleontological resources; thus, the likelihood of encountering a paleontological resource would be extremely unlikely during the excavation for the proposed basement level parking and storage space.

In the event that such a find were to occur, the proposed mixed-use development would be required to comply with the federal Paleontological Resources Preservation Act that limits the collection of vertebrate fossils and other rare and scientifically significant fossils to qualified researchers who have obtained a permit from the appropriate state or federal agency and PRC Section 5097 that prohibits the removal of any paleontological site or feature from public lands without the permission of the jurisdictional agency. The implementation protocols and adherence to the Society of Vertebrate Paleontology standards would ensure the protection of unique paleontological resources during construction. Some protocols include, but are not limited to:

- Excavations within a 50-foot radius of the find shall be temporarily halted or diverted.
- Ground-disturbance work shall cease until a qualified paleontologist determines whether the resource requires further study.
- The paleontologist shall document the discovery as needed, in accordance with Society of Vertebrate Paleontology standards,[18] as appropriate, evaluate the potential resource, and assess the significance of the finding under the criteria set forth in CEQA Guidelines Section 15064.5.
- The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction activities are allowed to resume at the location of the find.
- If not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of construction activities on the discovery. The excavation plan shall be submitted to the College for review and approval prior to implementation.
- All construction activities shall adhere to the recommendations in the excavation plan.

Because of the lack of unique geology and soils on the site that are unlikely to contain a paleontological resources, combined with mandatory compliance with regulations pertaining to paleontological resources, would ensure that the proposed project would not directly or indirectly cause substantial adverse effects to paleontological resources. The impact would be *less than significant* and this standard of significance will not be discussed in the EIR.

[18] Society of Vertebrate Paleontology, 2010, *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*, https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines-1.pdf, accessed March 20, 2023.

VIII. GREENHOUSE GAS EMISSIONS

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	■	❒	❒
b) Conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	■	❒	❒

DISCUSSION

a) and b) A project does not generate enough greenhouse gas (GHG) emissions on its own to influence global climate change; therefore, this discussion measures the project's contribution to the cumulative environmental impact. The proposed project would contribute to global climate change through direct and indirect emissions of GHGs from transportation sources, energy (natural gas and purchased energy), water use and wastewater generation, and solid waste generation. In addition, construction activities would generate a short-term increase in GHG emissions. Therefore, there would be a *potentially significant* impact and this topic will be addressed in the EIR.

IX. HAZARDS AND HAZARDOUS MATERIALS

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
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 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 material sites compiled pursuant to Government Code Section 65962.5 and, as a result, 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, 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?	❒	■	❒

DISCUSSION

A Phase I Environmental Site Assessment (ESA) Report was prepared for the mixed-use development project site by Partner Engineering and Science, Inc. on behalf of the College in February 2020 and reviewed by PlaceWorks. This section is based in part on the conclusions made in the Phase I ESA.

a) The proposed mixed-use development would involve construction activities that could result in the transport, use, and disposal of hazardous materials such as gasoline fuels, asphalt, lubricants, toxic solvents, pesticides, and herbicides. The transport, use, storage, and disposal of these materials would be temporary and would comply with existing regulations established by several agencies including the Department of Toxic Substances Control, the US Environmental Protection Agency (EPA), the US Department of Transportation, California Department of Transportation (Caltrans), California Highway Patrol, and the Occupational Safety and Health Administration. In addition, although not subject to San Francisco jurisdiction or code requirements, the College voluntarily participates in certain San Francisco Department of Public Health (SFDPH) regulatory programs governing hazardous waste and is permitted to use, store and dispose of small amounts of hazardous waste under them. Development of new academic, campus housing, or support space under the LRCP would entail similar levels of use of hazardous materials and would be permitted under current procedures. Furthermore, the proposed mixed-use development is not a type of project that would involve the routine transport or disposing of hazardous materials. The proposed mixed-use development would continue to operate in a similar capacity to the current uses on the site. Project operation would involve the routine use and transport of small amounts of hazardous materials for cleaning and maintenance purposes, such as cleansers, degreasers, pesticides, and fertilizers. These potentially hazardous materials would not be of a type or be present in sufficient quantities to pose a significant hazard to public health and safety or the environment. Furthermore, such substances for operational use would be used, transported, stored, and disposed of in accordance with applicable laws, policies, and regulations. With exercise of normal safety practices, the project would not create substantial hazards to the public or environment. The proposed mixed-use development is required to comply with all applicable regulations during project construction and operation, which would reduce impacts to a *less-than-significant* level and this standard of significance will not be addressed in the EIR.

b) As discussed in standard of significance (d) below, the project site is not a hazardous materials site. Additionally, pursuant to the Phase I ESA, no recognized environmental conditions (REC), controlled recognized environmental conditions (CREC), or historical recognized environmental conditions (HREC) were found on the project site. As described in the Phase I ESA, the existing buildings on the project site were constructed prior to 1970;[19] thus, the buildings may contain asbestos-containing materials (ACM) and lead-based paints (LBP) because these materials were not regulated until the 1970s. Further, as described under standard of significance (a) above, operation and construction of the proposed mixed-use development would involve the storage and use of common cleaning substances, building maintenance products, paints, and solvents, as well as petroleum-based fuels for maintenance and construction equipment, and coatings used in construction, which would not pose a hazard to the environment through the reasonably foreseeable upset or accident conditions involving the release of these materials.

An impact could occur if construction and operation of the proposed mixed-use development creates conditions where hazardous materials could easily contaminate surrounding soil, water, or air. The most likely scenarios would be from the demolition of buildings containing ACM, LBP, excavation of contaminated soils, or from rainwater runoff spreading contaminated waste. The removal of these types

[19] Phase I Environmental Site Assessment Local 2 Unite Here 201-247 Golden Gate Avenue San Francisco, California 94102, 2020, Partner Engineering and Science, Inc., February, pages i to ii.

of hazardous materials would be conducted by contractors licensed to remove and handle these materials and in accordance with applicable existing federal and State regulations, including United States Environmental Protection Agency's National Emission Standards for Hazardous Air Pollutants (Code of Federal Regulation Part 61), Title 8 of the California Codes of Regulations, and the California Unified Program,[20] and would ensure that risks associated with demolition and the transport, storage, use, and disposal of such materials would be reduced to the maximum extent practical. All spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable regulations. All contaminated waste would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility. In addition, the proposed mixed-use development is not considered the type of project that would create a hazardous materials threat to the users of the site or the surrounding land uses. Businesses are required by law to ensure employee safety by identifying hazardous materials in the workplace, providing safety information to workers who handle hazardous materials, and adequately training workers. For these reasons, hazardous materials used during project construction and operation would not pose any substantial public health or safety hazards resulting from hazardous materials. In addition, as described in standard of significance (a), the transportation of hazardous materials would be regulated by the US Department of Transportation, Caltrans, California Highway Patrol. Therefore, potential impacts related to the routine use, transport, and disposal of hazardous materials would be *less than significant* and this standard of significance will not be addressed in the EIR.

c) There are schools within approximately 0.25 miles (1,320 feet) of the project site; however, there are no known plans for a proposed school in this distance to the project site. The closest educational facilities to the project site are De Marillac Academy, Cross Cultural Family Center-Turk Street Center, and Larkin Street Youth Services Academy, each located within 600 feet of the project site. As described in standards of significance (a) and (b) the proposed mixed-use development would not include the routine transport or disposing of hazardous materials or reasonably foreseeable upset and accident conditions involving the release of hazardous materials during construction or operation that would cause a significant hazard to the schools within 0.25 miles of the project site. As described, project operation would involve the use of small amounts of hazardous materials for cleaning and maintenance purposes, such as cleansers, degreasers, pesticides, and fertilizers. These potentially hazardous materials would not be of a type or be present in sufficient quantities to pose a significant hazard to public health and safety or the environment. Hazardous materials during the construction phase would be limited to construction equipment and the demolition of buildings and excavation of the on-site soils, which would be fully addressed through compliance with applicable federal and State regulations. Therefore, the impact would be *less than significant*, and this standard of significance will not be addressed in the EIR.

d) A recent search of the Department of Toxic Substances Control EnviroStor Database, which is the data management system for tracking cleanup, permitting, enforcement and investigation efforts at hazardous waste facilities and sites with known contamination or sites where there may be reasons to investigate

[20] The California Unified Program protects Californians from hazardous waste and hazardous materials by ensuring local regulatory agencies consistently apply statewide standards when they issue permits, conduct inspections, and engage in enforcement activities. The Unified Program is a consolidation of multiple environmental and emergency management programs and is overseen by the California Environmental Protection Agency.

further, did not include any hazardous materials sites on the project site.[21] Therefore, there would be no impact from hazardous materials as a result of being listed on a known hazardous materials site and this standard of significance will not be addressed in the EIR.

e) The proposed project is not located within an airport land use plan or within two miles of an airport. The nearest public airports are San Francisco International Airport, approximately 13 miles to the south, and the Oakland Airport, approximately 19.5 miles to the southeast. Therefore, there would be *no impact* and this standard of significance will not be addressed in the EIR.

f) The College has adopted an emergency response plan that explains safety protocols and outlines steps to follow in the event of an emergency.[22] The College will update the plan to reflect the changes made by the proposed project and implementation of the plan would not be impaired by the proposed project. Therefore, there would be *a less-than-significant* impact and this standard of significance will not be addressed in the EIR.

g) The project site is fully developed and is surrounded by built-out urban uses. As described in Section XXI, *Wildfire*, the project site is not in or near a very high fire hazard severity zone or wildland-urban interface (WUI) area. Because the project is located outside of a designated fire hazard area or WUI, the proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires; therefore, there would be *no impact* and this standard of significance will not be addressed in the EIR.

X. HYDROLOGY AND WATER QUALITY

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water 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 which would: i) Result in substantial erosion or siltation on or off-site; ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; 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?	■	❒	❒

[21] California Department of Toxic Substances Control EnviroStor Database, https://www.envirostor.dtsc.ca.gov/public/map, accessed May 1, 2023.

[22] UC Hastings Law Emergency Response Operations Plan, Revised 2022, https://www.uchastings.edu/wp-content/uploads/2020/10/Emergency-Operations-Plan_UC-Hastings_Safety-and-Security_Revised_10-9-20.pdf, accessed on March 8, 2023.

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
d) In a flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	❒	❒	■
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	■	❒	❒

DISCUSSION

a) The proposed mixed-use development would involve soil disturbance, construction, and operation of land uses that could generate pollutants affecting stormwater.

Short-term Construction Impacts

Clearing, grading, excavation, and construction activities associated with the proposed mixed-use development have the potential to impact water quality through soil erosion and by increasing the amount of silt and debris carried in runoff. Additionally, the use of construction materials such as fuels, solvents, and paints, may present a risk to surface water quality. Finally, the refueling and parking of construction vehicles and other equipment on-site during construction may result in oil, grease, or related pollutant leaks and spills that may discharge into the storm drain system.

The area of disturbance for the proposed new mixed-use development site is approximately 0.60 acres. Therefore, since the project would disturb less than one acre of land, it is not subject to the requirements of the State Water Resources Control Board's General Construction Permit, which regulates sites that disturb one acre or more. However, compliance with existing regulatory requirements, such as the implementation of grading erosion control measures specified in the CBC, would reduce impacts from erosion and the loss of topsoil. Examples of these control measures are best management practices such as hydroseeding or short-term biodegradable erosion control blankets; vegetated swales, silt fences, or other forms of protection at storm drain inlets; post-construction inspection of drainage structures for accumulated sediment; and post-construction clearing of debris and sediment from these structures.

While adherence to applicable State regulations and implementation of best management practices to minimize erosion and sedimentation would address anticipated and expected pollutants of concern from construction activities, there is the potential for the short-term construction phase to generate pollutants affecting stormwater. Therefore, the impacts related to the construction phase would *potentially significant* and this topic will be addressed in the EIR.

Long-term Operational Impacts

Future development under the LRCP, including the proposed mixed-use development, would be similar to existing land uses. Therefore, the stormwater and wastewater quality of these discharges is not expected to change significantly. The proposed project is in an area of San Francisco where there is a combined stormwater and wastewater collection system.

While the proposed mixed-use development would be similar to existing conditions and is not expected to result in stormwater or wastewater that would violate any applicable water quality standards or waste discharge requirements, there is the potential for the long-term operational phase to generate pollutants affecting stormwater. Therefore, impacts would be *potentially significant* and this standard of significance will be addressed in the EIR.

b) Water is supplied to the project site and San Francisco by the San Francisco Public Utilities Commission (SFPUC). Approximately 97 percent of the water supplied to the San Francisco is surface water from the Hetch Hetchy Regional Water System (RWS) with the remainder being a combination of groundwater and recycled water. The proposed mixed-use development would involve redevelopment of existing land uses which are currently supplied by water from the SFPUC and the 2020 Urban Water Management Plan (UWMP) states that there are available water supplies to meet its customer demands for normal, single-dry years, and multiple drought years through 2045. Therefore, the proposed mixed-use development would receive water supply primarily from surface water sources and thus would not decrease groundwater supplies or interfere with sustainable groundwater management.

The proposed mixed-use development would not include groundwater wells that would extract groundwater from an aquifer and would result in similar land uses that currently exist on the project site. New projects and redevelopment projects would be required to implement BMPs and low-impact development (LID) measures that include drainage to landscaped areas and bioretention that would increase groundwater recharge as compared to existing conditions. As such, the proposed project would not have a significant impact on groundwater recharge. Therefore, impacts would be *less than significant,* and this standard of significance will not be addressed in the EIR.

c) While the proposed mixed-use development is in a built-out area of San Francisco, there is the potential for the proposed mixed-use development to result in the alteration of existing drainage patterns and impacts would be *potentially significant*, and this standard of significance will be addressed in the EIR.

d) According to the Federal Emergency Management Agency (FEMA), the project site is not within a 100-year or 500-year flood zone (FEMA 2021). Additionally, the project is not in a dam or tsunami inundation zone. According to the Local Hazard Mitigation Plan and the Department of Water Resources Dam Breach Inundation Mapping website, the project site is not within any dam inundation zone. It also is not within a tsunami inundation zone and is not near large bodies of water that would trigger a seiche. Therefore, the project would not risk the release of pollutants associated with these events and the result is *no impact.*

e) The proposed project is within the Downtown Groundwater Basin, which is designated by the Department of Water Resources as a very low priority basin and no Groundwater Sustainability Plan is required to be prepared by San Francisco. Also, the groundwater basin is not used for groundwater supply. Therefore, redevelopment of the fully developed project site would not obstruct the implementation of a sustainable groundwater management plan. While it is unlikely the proposed mixed-use development project would conflict with or obstruct a water quality control plan given the location of the project site, the impact is considered potentially significant, and this standard of significance will be addressed in the EIR.

XI. LAND USE AND PLANNING

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
a) Physically divide an established community?	❒	❒	■
b) Cause a significant 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?	❒	■	❒

DISCUSSION

Although not identified as a standard of significance, CEQA Guidelines Section 15063(d)(5) states that the contents of the Initial Study shall include an examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls. The mixed-use development site is in San Francisco's C-3-G (Downtown General Commercial) Zoning District. This District covers the western portions of downtown San Francisco and is composed of a variety of uses, including retail, offices, hotels, entertainment, clubs, institutions, and high-density residential. While UC Law SF is not subject to San Francisco's jurisdiction or its planning and land use/zoning controls, student housing and educational use are permitted within the C-3-G zoning district, as is non-retail sales and service (including trade office) on the ground floor, with approval of a Conditional Use Authorization. Therefore, the mixed-use development is consistent with the existing zoning.

a) The construction of the proposed mixed-use development would occur on a site that is currently developed with buildings used by Local 2. The proposed mixed-use development would retain the existing roadway patterns and would not introduce any new major roadways or other physical features through existing residential neighborhoods or other communities that would create new barriers. Instead, this project would create a more connected campus by making it easier to reach other buildings and increase wayfinding capabilities. Local 2 would continue to operate out of the newly developed building and they would not need to be relocated. Due to this, the project would not physically divide an established community. Therefore, *no impact* would occur under this standard of significance will not be discussed in the EIR.

b) The proposed project would update the LRCP and develop the 201 Golden Gate Avenue Mixed-Use Project. As the LRCP provides a long-term framework for campus development and operations, and has been prepared simultaneously with the conceptual design for the proposed mixed-use development, it will guide the proposed mixed-use development project, and no policy conflicts adopted for the purpose of avoiding or mitigating an environmental effect would occur. The proposed mixed-use development complements and provides more specifics to the proposed LRCP Update but does not include policy details that would override the LRCP. Because the LRCP is the overriding planning document for the College and because the proposed project involves amending the LRCP, the impact would be *less than significant*. Therefore, this standard of significance will not be addressed in the EIR.

XII. MINERAL RESOURCES

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
a) Result in the loss of availability of a known mineral resource that would be a 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?	❒	❒	■

DISCUSSION

a) and b) The California Department of Conservation, Geological Survey (CGS) classifies lands into Aggregate and Mineral Resource Zones (MRZs) based on guidelines adopted by the California State Mining and Geology Board, as mandated by the Surface Mining and Reclamation Act of 1975.[23] These MRZs identify whether known or inferred significant mineral resources are present in areas. According to the San Francisco General Plan, minerals are not found in San Francisco to any appreciable extent.[24] Therefore, there would be *no impact* and this topic will not be addressed in the EIR.

XIII. NOISE

Would the proposed project result in:	Potentially Significant Impact	Less than Significant	No Impact
a) Generation of 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 in other applicable local, state, or federal standards?	■	❒	❒
b) Generation of 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 or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	❒	❒	■

DISCUSSION

a) and b) The types of uses associated with the operation of the proposed mixed-use development are not typically considered to generate excessive noise. However, due to the proximity of the proposed development to the Kelly Cullen Community Apartments to the north, De Marillac Academy (non-residential school) to the east, McAllister Tower to the south, and the Lofts at Seven Apartments to the west, noise impacts from operation and construction will need to be evaluated to identify the need and

[23] Public Resources Code, Division 2, *Geology, Mines and Mining*, Chapter 9, *Surface Mining and Reclamation Act of 1975*, Article 4, *State Policy for the Reclamation of Mined Lands*, Section 2762(a)(1).

[24] San Francisco General Plan, Environmental Protection Element, https://generalplan.sfplanning.org/I6_Environmental_Protection.htm, accessed on March 2, 2023.

nature of any required mitigation. Therefore, there would be a *potentially significant* impact and this standard of significance will be addressed in the EIR.

c) The proposed project is not located within an airport land use plan or within two miles of an airport. The nearest public airports are San Francisco International Airport, approximately 13 miles to the south, and the Oakland Airport, approximately 19.5 miles to the southeast. The proposed project is not located within the immediate vicinity of a private airstrip or heliport. The nearest heliport is the UCSF Helipad, approximately 2.3 miles to the southeast. The nearest private airport is Hayward Executive Airport, approximately 24.6 miles to the southeast. Therefore, *no impact* would occur this standard of significance will not be addressed in the EIR.

XIV. POPULATION AND HOUSING

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
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, necessitating the construction of replacement housing elsewhere?	❒	❒	■

DISCUSSION

a) In general, a project would be considered growth inducing if its implementation would result in substantial population increases and/or new development that might not occur if the project were not implemented. The proposed mixed-use development would create up to 394 units of new campus housing in the area, resulting in up to 831 new residents.[25]

The proposed project would increase the residential population on the project site of the proposed mixed-use development, as the current site is occupied with only non-residential uses. However, this site-specific increase would not result in a substantial increase in the overall population of the surrounding area. The proposed project is intended to accommodate the existing educational population in the project vicinity, as the project is expected to be occupied by students, staff and/or faculty who already reside, work, and/or study in San Francisco and the Bay Area region. The 2020 U.S. Census reported a population of 873,965 residents in San Francisco. According to ABAG, San Francisco is projected to grow by 213,000 people by 2050, the proposed project would represent about 0.4 percent of the expected increase in population foreseen by ABAG.[26] Due to the proposed development being within the growth projections of

[25] Based on an average household size in San Francisco of 2.11 persons per household. Department of Finance, 2023, https://dof.ca.gov/wp-content/uploads/sites/352/Forecasting/Demographics/Documents/E-5_2023_InternetVersion.xlsx, accessed on May 5, 2023.

[26] ABAG, Growth Pattern, https://www.planbayarea.org/sites/default/files/FinalBlueprintRelease_December2020_GrowthPattern_Jan2021Update.pdf, accessed on March 2, 2023.

ABAG, the population growth occurring for the proposed project is not unaccounted for and is not substantial enough to create direct substantial unplanned population growth.

Regarding potential indirect effects of unplanned population growth, the College campus is in an established urban environment that already has municipal infrastructure. Due to this, the proposed LRCP Update and the 201 Golden Gate Avenue Mixed-Use Project would not require or create new demand for an extension of municipal infrastructure.

While the proposed project would create population growth at the local level, it will not be at an amount that is substantial enough to cause direct or indirect unplanned population growth in the area. Therefore, there would be *a less-than-significant* impact and this standard of significance will not be addressed in the EIR.

b) At the site of the proposed mixed-use development, the Local 2 operations occurring in the existing low-rise buildings would be incorporated into the newly developed building and Local 2 would not need to be relocated permanently. Instead, new offices and meeting space for Local 2 would be built and approximately 42,000 gross square feet of the new development would be dedicated to Local 2 operations. Therefore, no people would be displaced as part of this project.

The 2018-2023 LRCP outlines the creation of new housing for students, faculty and staff with the development of the new building at 198 McAllister Street (The Academe at 198) and the renovation of building at 100 McAllister Street (McAllister Tower). The Academe at 198, which includes campus housing and academic/programmatic and retail space, opens in August 2023 and renovation of the McAllister Tower, which includes residential mixed-use, will commence in 2024. Those projects are expected to reduce the demand placed on the local housing market by students, faculty and/or staff who would otherwise seek market-rate housing in the vicinity. The LRCP Update would continue these initiatives and expand campus facilities to include housing at the proposed development.

The proposed mixed-use development would involve replacing the existing low-rise buildings with a 14- to 16-story mixed-use building to facilitate long-term growth of the College and its institutional and community partners. The existing low-rise buildings do not have any housing units, so the replacement of them will not displace existing housing.

The LRCP Update and the 201 Golden Gate Avenue Mixed-Use Project would not displace any existing people or housing. Therefore, there would be *no impact* and this standard of significance will not be addressed in the EIR.

XV. PUBLIC SERVICES

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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:			
i) Fire protection?	❒	■	❒
ii) Police protection?	❒	■	❒
iii) Schools?	❒	■	❒
iv) Parks?	❒	■	❒
v) Other public facilities?	❒	■	❒

DISCUSSION

Public service providers in San Francisco that would serve the proposed project include the following:

- The San Francisco Fire Department (SFFD) provides fire and emergency response services to San Francisco. The closest station to the College campus is San Francisco Fire Department Station 3, which is 0.6 miles to the northwest of 201 Golden Gate Avenue.
- The San Francisco Police Department provides police protection services to San Francisco. The closest police station to the College campus is the Tenderloin Station, which is located roughly 0.25 miles to the northeast of 201 Golden Gate Avenue.
- The College campus is within the boundaries of the San Francisco Unified School District (SFUSD). Nine schools are located within less than one mile of the project site, the three closest are: Tenderloin Community Elementary School, Bessie Carmichael School PreK-8 Filipino Education Center (pre-kindergarten through 8th grade), and Redding Elementary School.[27]

a) The primary purpose of a public services impact analysis is to examine the impacts associated with physical improvements to public service facilities required to maintain acceptable service ratios, response times or other performance objectives. Public service facilities may need improvements (i.e., construction, renovation, or expansion) as demand for services increase. Increased demand is typically driven by increases in population. The proposed project would have a significant environmental impact if it would exceed the ability of public service providers to adequately serve residents, thereby requiring construction of new facilities or modification of existing facilities.

[27] SFUSD, School Finder, https://www.sfusd.edu/schools/enroll/discover/school-finder?address=201+Golden+Gate+Ave%2C+San+Francisco%2C+CA+94102%2C+USA, accessed March 7, 2023.

As discussed in Section XIV, *Population and Housing*, the proposed mixed-use development could result in a net increase of up to 831 residents and associated employees at the project site.[28] Given the proposed project would represent about 0.4 percent of the expected increase in population foreseen by ABAG for San Francisco, it would not exceed or contribute to the need for new construction or expansion of an existing fire, police, or library facility that would serve the project site.[29] The proposed project is intended to accommodate the existing educational population in the project vicinity, as the project is expected to be occupied by students, staff and/or faculty who already reside, work, and/or study in San Francisco and the Bay Area region. With respect to public schools, it is assumed the future residents of the proposed project may generate school-age children that could attend SFUSD schools. However, the project would be required to pay the school impact fees for new residential and office development pursuant to Government Code Section 65995. Any potential school facility improvements made in the future at schools accommodating the proposed project would be planned and implemented by the school district and would constitute separate projects under CEQA requiring environmental review.

With respect to police services, the College has contracted with UC San Francisco (UCSF). UCSF provides security guards at all campus buildings to observe and protect the integrity of the campus buildings as well as to observe and report, contacting the San Francisco Police Department for needed emergency response in and around the buildings or on the extensive security camera system.[30] The College also contracts with the non-profit Urban Alchemy to provide safety practitioners along all campus frontages offering sidewalk safety services through engaging with members of the public and making sure the sidewalks remain safe.[31] Urban Alchemy is trained in de-escalation techniques, however, if activities on the sidewalks surrounding the campus extend beyond their training, which could mean violence or the appearance of weapons, Urban Alchemy contacts SFPD for emergency response. UCSF security and Urban Alchemy work together to respond to safety situations that might arise in and around the campus, contacting SFPD when their emergency response is required. These relationships allow the College to reduce demand to the police protection services provided by the San Francisco Police Department. Therefore, there would be a *less-than-significant* impact and this topic will not be addressed in the EIR.

[28] Based on an average household size in San Francisco of 2.11 persons per household. Department of Finance, 2023, https://dof.ca.gov/wp-content/uploads/sites/352/Forecasting/Demographics/Documents/E-5_2023_InternetVersion.xlsx, accessed on May 5, 2023.

[29] ABAG, 2021, Plan Bay Area 2050 Growth Pattern, https://www.planbayarea.org/sites/default/files/FinalBlueprintRelease_December2020_GrowthPattern_Jan2021Update.pdf, accessed March 7, 2023.

[30] UC law San Francisco, Safety and Security, https://www.uchastings.edu/offices-and-services/safety-and-security/, accessed on March 7, 2023.

[31] Urban Alchemy is a 501(c)3 tax-exempt organization and your donation is tax-deductible within the guidelines of U.S. law., https://urban-alchemy.us/about-us/.

XVI. RECREATION

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated?	❒	■	❒
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	❒	■	❒

DISCUSSION

a) and b) Increased demand for existing neighborhood and regional parks or other recreational facilities is typically driven by increases in population. Implementation of the proposed project could include up to 394 units of campus housing, depending on the type of variant chosen. This results in up to 831 new residents.[32] According to ABAG, San Francisco is projected to grow by 213,000 people by 2050; the proposed project would represent about 0.4 percent of the expected increase in population foreseen by ABAG. While the proposed development will create population growth, it is not unaccounted for and not large enough to cause recreational facilities to deteriorate or require new recreation facilities to be created. Furthermore, as described in Section XIV, Population and Housing, the proposed project is intended to accommodate the existing educational population in the project vicinity, as the project is expected to be occupied by students, staff and/or faculty who already reside, work, and/or study in San Francisco and the Bay Area region. Therefore, there would be a *less-than-significant* impact and this topic will not be addressed in the EIR.

XVII. SHADOW

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
a) Create new shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces?	■	❒	❒

DISCUSSION

a) CEQA does not recognize casting shadow or shade on an existing building or space as a potentially significant environmental impact. However, due to the dense urban setting and variation of building heights and availability of publicly accessible open spaces, San Francisco considers casting shadows or shade on these spaces to the degree that shadow impacts on open space would be considered an adverse physical impact to the environment. Although UC Law SF is not subject to local codes and regulations,

[32] Based on an average household size in San Francisco of 2.11 persons per household. Department of Finance, 2023, https://dof.ca.gov/wp-content/uploads/sites/352/Forecasting/Demographics/Documents/E-5_2023_InternetVersion.xlsx, accessed on May 5, 2023.

because the proposed mixed-use development would be greater than 40 feet in height there is the potential for new shadows to be created from this project. Therefore, there would be a *potentially significant* impact and this topic will be addressed in the EIR.

XVIII. TRANSPORTATION

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	■	❒	❒
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	■	❒	❒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	■	❒	❒
d) Result in inadequate emergency access?	■	❒	❒

DISCUSSION

a), b), c), and d) The proposed mixed-use development, as described throughout this document, would introduce up to 831 new residents to the project area. The new residents and visitors to campus would travel to and from the project site via public transportation, bicycle, ride share, and private cars; on foot; or by use of micro-transportation vehicles such as electric scooters. Given the project site's location in a transit-rich area with limited parking at the mixed-use development site for Local 2 employees and spaces for delivery, moving, and solid waste services, it is unlikely to conflict with CEQA Guidelines Section 15064.3 regarding VMT standards. Furthermore, while the proposed project would not physically alter the existing roadways or affect emergency access to the site and the surrounding area, it would add a new driveway off of Leavenworth Street to access new basement level parking spaces and add loading spaces for delivery and moving trucks for the new residents. Accordingly, the proposed mixed-use development's impacts to the programs, plans, and policies addressing the circulation system and potential hazards from the design would have the potential to result in a significant impact, and these standards of significance will be evaluated in the EIR.

XIX. TRIBAL CULTURAL RESOURCES

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
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, 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	■	❒	❒

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
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 Resource Code Section 5024.1. In applying the criteria set forth in subdivision (c) of the Public Resource Code Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance to a California Native American tribe.			

DISCUSSION

a) There are no known Tribal Cultural Resources on the project site, and same as the discussion provided in Section VII, Geology and Soils, the project site is underlain with artificial fill soils. Accordingly, there is very little likelihood of unearthing an unknown Tribal Cultural Resource during the construction phase of the proposed mixed-use development. However, the College is engaging in the consultation process with Native American Tribes and the results of that outreach and potential consultation will be presented in the EIR. As such, for the purpose of this Initial Study at this phase of the project, impacts related to Tribal Cultural Resources are considered potentially significant and this standard of significance will be evaluated in the EIR.

XX. UTILITIES AND SERVICE SYSTEMS

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
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 adequate 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?	❒	■	❒

DISCUSSION

a) The proposed mixed-use development would demolish the existing building and construct a high-rise multi-use building with residential units, programmatic/academic space, and office space for Local 2. This would require the installation of new utilities or the reconfiguration of existing utilities to serve the project. Utility improvements would not require or result in the relocation or construction of new or expanded facilities outside of the project area. The proposed mixed-use development would connect with existing infrastructure in the adjacent streets. Additionally, new construction would comply with the latest

CALGreen Building Standards, which would result in efficiencies in water and wastewater generation and power and natural gas consumption. A discussion of the project's potential impacts on waste, wastewater, storm drainage, energy, and telecommunications facilities follows.

Water Supply

Water is supplied to San Francisco by the SFPUC, which owns and operates the San Francisco Regional Water System (RWS). The system collects water from the Tuolumne River in the Sierra Nevada, which is stored in the Hetch Hetchy Reservoir, and from local watersheds in the East Bay and Peninsula. The San Francisco's distribution system is also owned and operated by the SFPUC and serves a population of nearly 900,000 in San Francisco. The distribution system includes ten reservoirs, eight water tanks, 17 pump stations and approximately 1,250 miles of pipelines. The raw water from the Hetch Hetchy reservoir is treated by ultraviolet disinfection at the Tesla Treatment Facility. It was completed in 2011 and can treat up to 315 million gallons per day.

The 2020 Urban Water Management Plan (2020 UWMP) for San Francisco assumes a growth projection of 104,267 additional residents between the years 2020 and 2030. It also assumes an additional 5,000 dwelling units per year. The 2020 UWMP estimates that current and projected water supplies will be sufficient to meet future demands for San Francisco customers during normal and single-dry years. However, the SFPUC would experience shortages in the 4th and 5th years of a multi-year drought at year 2045. If the Bay-Delta Amendment is implemented in the future, the SFPUC would meet projected water demands in normal years but would experience supply shortages in single dry years and multiple dry years. These shortages would require implementation of the Water Shortage Contingency Plan and a corresponding retail Water Shortage Allocation Plan. in addition, the SFPUC has initiated an Alternative Water Supply Planning Program to ensure that San Francisco can meet its retail and wholesale customer need through the year 2045.

The College is not a city or county and therefore is not subject to the water supply assessment regulations under the California Water Code. However, the project does meet the criterion established by the SFPUC of 50,000 gallons/day as the maximum water demand for projects that do not meet the definitions provided in the California Water Code, as discussed below.

Using the SFPUC Single Site Non-Potable Water Calculator, the estimated daily water demand for the Academic Light variant (394 dwelling units and 61,200 square feet of office and academic/programmatic space) would be 28,436 gpd. For the Academic Heavy variant (233 dwelling units and 122,400 square feet of office and academic/programmatic space), the estimated daily water demand would be 19,066 gpd. The actual water demand would be less than these amounts because the project would be required to comply with the SFPUC's Onsite Water Reuse Program, which requires new development projects of 100,000 gross square feet or greater in San Francisco to install and operate an onsite water reuse system. For residential and mixed-use projects, the project must meet its toilet and urinal flushing, irrigation, clothes washing, and drain trap priming demands through the collection, treatment, and use of available graywater and condensate.

The estimated project water demand is less than 0.04 percent of the total water demand of the SFPUC retail area. Also, the addition of a maximum of 394 housing units is only 4 percent of the expected

increase of 10,000 additional housing units between 2020 and 2030 that was accounted for in the 2020 UWMP. Therefore, the project's water demand would not require or result in the relocation or construction of new or expanded water facilities. The Tesla Water Treatment Facility has the capacity to treat up to 315 million gallons/day.

Therefore, there are sufficient water supplies available to serve the proposed mixed-use development and future development under the LRCP Update in normal and multiple dry years through 2040 unless the Bay-Delta Plan Amendment is implemented. If the Bay-Delta Plan Amendment is implemented in its current configuration, the SFPUC would have sufficient water supplies in normal years but a shortage of supplies in single and multiple dry years. The adoption of the Bay-Delta Plan Amendment is currently facing numerous lawsuits in state and federal courts, including legal challenges by the US Bureau of Reclamation. The manner in which the Bay-Delta Plan Amendment would be implemented and how those amendments would affect SFPUC's water supply is currently unknown. In the meantime, the SFPUC is in the process of developing additional water supplies and has implemented a number of water supply projects to meet dry-year demands with no greater than 20 percent system-wide water rationing. These projects include:

- San Francisco Purified Water Project
- Satellite Recycled Water Project
- Innovations Program
- Potable Offset Potential
- Daly City Recycled Water Expansion
- ACWD-USD Purified Water Partnership
- Crystal Springs Purified Water Project
- Los Vaqueros Reservoir Expansion
- Bay Area Regional Reliability Shared Water Access Program
- Bay Area Brackish Water Desalination Project
- Calaveras Reservoir Expansion
- Groundwater Banking
- Dry Year Transfers

With continued implementation of water conservation programs, declining per capita water use in San Francisco, and implementation of the Water Shortage Contingency Plan during drought conditions, the impact of the project on water supplies is considered to be *less than significant*.

Wastewater Collection and Treatment

The SFPUC provides wastewater services to San Francisco and a portion of northern San Mateo County. The SFPUC wastewater collection and treatment system consists of a combined sewer system, which collects both wastewater and stormwater; three wastewater treatment plants; and effluent outfalls to San Francisco Bay and the Pacific Ocean. The SFPUC owns and operates about 1,900 miles of sewer mains and laterals under the streets. A few areas of San Francisco are served by a separate sanitary sewer system and storm drain system.

On non-rainy days, more than 80 million gallons of wastewater are collected and transported to one of three wastewater treatment plants (Southeast, Oceanside, and NorthPoint). On rainy days, the wastewater system collects and treats up to 575 million gallons per day (mgd). The project site and surrounding area are served by the Southeast Treatment Plant (SEP), which is located in Bayview/Hunter Point and treats an average of 60 mgd of wastewater and up to 250 mgd during rainstorms. The North Point Wet-Weather Facility (NPF), located near Fisherman's Wharf, was converted to an only wet-weather treatment facility. When the SEP approaches capacity at approximately 250 mgd, additional flow is diverted to the NPF. The NPF has the capacity to treat up to 150 mgd during rainstorms.

Wastewater flows from the proposed mixed-use development would be treated at the SEP or the NPF (during wet weather) prior to discharge through an existing outfall into San Francisco Bay. For this analysis, it was assumed that 95 percent of the water demand becomes wastewater, as per the SFPUC's wastewater rate schedules for multi-family residences. The wastewater discharge rate for the Academic Light variant is estimated to be approximately 27,000 gpd[33] and the wastewater discharge rate for the Academic Heavy variant is estimated to be approximately 18,000 gpd.[34] These estimates are conservative (i.e., they represent a "worst case scenario") and do not take into account compliance with the SFPUC's Non-Potable Water Program, which requires developers of buildings that are 100,000 square feet or greater to install and operate an onsite water reuse system. For mixed-use projects, the project must meet its toilet and urinal flushing, irrigation, clothes washing, and drain trap priming demands through the collection, treatment, and use of available graywater and condensate. This would further reduce the amount of wastewater entering the combined sewer system. Also, compliance with the latest CALGreen code requirements would reduce the amount of water use by installing low-flow fixtures and appliances, thus also reducing the wastewater flow rates.

Current dry-weather wastewater flow rates to the SEP are 60 mgd, or approximately 24.5 mgd less than the permitted 84.5 mgd capacity of the plant. The increase in wastewater generation from the proposed mixed-use development is approximately 0.1 percent of the residual capacity of the SEP. Also, the estimated project wastewater flow rates are conservative because they do not account for implementation of the Non-Potable Water Program and CALGreen water conservation code requirements. The wastewater generated by the project can be accommodated by the existing wastewater treatment plant and would not require new construction or the expansion of existing facilities. The impact of the project on wastewater facilities is *less than significant*.

Storm Water

The proposed mixed-use development would involve redevelopment of a site that is already fully developed with essentially 100 percent impervious surfaces. Therefore, implementation of the proposed mixed-use development would not substantially alter or increase the amount of stormwater currently discharging from the site. In fact, with the installation of new LID features and BMPs, the amount of stormwater discharged from the site would decrease as compared to existing conditions. Stormwater discharges flow into San Francisco's combined stormwater and sewer system, which would then flow into the SEP for treatment and eventual discharge to the Bay. Discharges to the SEP are regulated by the San Francisco RWQCB's NPDES permit.

Because the proposed mixed-use development would reduce the stormwater runoff when compared to existing conditions, the proposed mixed-use development would generate less stormwater than current conditions. Also, new construction compliance with CALGreen requirements to install water-efficient fixtures would result in the generation of less wastewater to the combined stormwater/sewer system. Therefore, the project would not exceed the wastewater treatment requirements of the RWQCB and impacts would be *less than significant*.

[33] 28,436 gpd x 0.95 = 27,014 gpd
[34] 19,066 gpd x 0.95 = 18,113 gpd

Energy and Telecommunication Facilities

The project site is currently served by Pacific Gas & Electric (PG&E) for electricity and natural gas, and there are connections at the existing building for telecommunication providers. Although there may be some relocation of electric, natural gas, or telecommunications infrastructure during construction, the infrastructure at the site would be restored upon completion of construction.

The proposed mixed-use development would include connections to the existing PG&E and telecommunication system, there is sufficient capacity by these providers to serve the project and foreseeable future development. Therefore, no new off-site facilities and/or distribution infrastructure would be required. Furthermore, the proposed mixed-use development would be required to comply with energy efficiency standards set forth by Title 24 of the California Administrative Code and the Appliance Efficiency Regulations. The proposed mixed-use development would also comply with CALGreen requirements related to energy and water conservation. These measures will minimize energy consumption.

Therefore, the proposed mixed-use development would not result in a substantial increase in energy service demands. PG&E and telecommunication companies would not need to expand their supply and transmission facilities to handle the demand generated by the project, and impacts would be *less than significant*.

b) As discussed in standard of significance (a), the mixed-use development's water demands were estimated using the SFPUC's Non-Potable Water Calculator. The estimated daily water demand for the Academic Light variant would be 28,436 gpd. For the Academic Heavy variant, the estimated daily water demand would be 19,066 gpd.

The 2020 UWMP for San Francisco assumes a growth projection of 104,267 additional residents between the years 2020 and 2030. It also assumes an additional 5,000 dwelling units per year. The buildout year for the project is anticipated to be in 2028. The addition of up to 831 residents is a very small percentage of the anticipated growth in San Francisco by 2030 (0.8 percent).[35] Also, the addition of up to 394 dwelling units would be less than 8 percent of the anticipated increase in dwelling units by 2030 that is accounted for in the 2020 UWMP. The daily water demand for the Academic Light variant would be less than 0.04 percent of the projected water demand of 68 million gallons/day by the year 2030 and for the Academic Heavy variant would be less than 0.03 percent.

The 2020 UWMP estimates that current and projected water supplies will be sufficient to meet future demands for San Francisco customers during normal and single-dry years. However, the SFPUC would experience shortages in the 4th and 5th years of a multi-year drought at year 2045. If the Bay-Delta Amendment is implemented in the future, the SFPUC would meet projected water demands in normal years but would experience supply shortages in single dry years and multiple dry years. These shortages would require implementation of the Water Shortage Contingency Plan and a corresponding Retail Water Shortage Allocation Plan. In addition, the SFPUC has initiated an Alternative Water Supply Planning

[35] 831 / 104,267 = 0.8 percent

Program to ensure that San Francisco can meet its retail and wholesale customer need through the year 2045.

With pending litigation, it is unclear when or if the Bay-Delta Amendment would be implemented. If there is not sufficient time to develop additional water supplies, the SFPUC would require rationing through implementation of the Retail Water Shortage Allocation Plan. However, the small increase in potable water demand by the project compared to San Francisco-wide demands would not substantially impact dry-year rationing provisions. Also, the SFPUC is projected to meet retail demands for normal and single-dry years through the year 2040.

Therefore, there are sufficient water supplies available to serve the proposed mixed-use development and future development in normal and multiple dry years through 2040 without implementation of the Bay-Delta Amendment. Implementation of the Bay-Delta Amendment could result in water shortages in single and multiple dry years. However, the SFPUC has various programs to account for water shortages, including the Water Shortage Contingency Plan, the Retail Shortage Allocation Plan, and the 2020 Retail Water Conservation Plan. The small increase in potable water demand with implementation of the proposed mixed-use development would not substantially impact SFPUC's water supplies. Also, the per capita water use in San Francisco has declined by 30 percent even while the population has increased by 15 percent. Adherence to the CALGreen code that includes water conserving fixtures and appliances, would result in *less than significant* impacts with respect to water supply.

c) Construction activities could result in wastewater generation as a result of dewatering and demands from on-site construction workers. The Phase I ESA indicates that groundwater is approximately 10 feet below ground surface (bgs) and construction of the basement could require construction dewatering. However, this demand would be temporary and limited in terms of volume.

Operational flows from the project would be treated at the SEP or the NPF (during wet weather) prior to discharge through an existing outfall into San Francisco Bay. For this analysis, it was assumed that 95 percent of the water demand becomes wastewater, pursuant to the SFPUC's wastewater rate schedules for multi-family residences. As described under standard of significance (a), the wastewater discharge rate for the Academic Light variant is estimated to be approximately 27,000 gpd and the wastewater discharge rate for the Academic Heavy variant is estimated to be about 18,000 gpd.

Current dry-weather wastewater flow rates to the SEP are 60 mgd, which is 24.5 mgd less than the permitted 84.5 mgd capacity of the plant. The increase in wastewater generation from the proposed mixed-use development is approximately 0.1 percent of the residual capacity of the SEP. Also, the installation of LID features and BMPs for stormwater control at the site would reduce the amount of stormwater flowing into the combined sewer system. Finally, the construction of the project in compliance with the latest CALGreen building code would reduce the amount of water, and thus wastewater, generated by the project. Therefore, the SEP has the capacity to treat wastewater generated by the proposed mixed-use development as well as future proposed development within San Francisco. No additional wastewater treatment facilities would need to be constructed and impacts associated with wastewater treatment capacity are *less than significant*.

d) Students and employees would participate in San Francisco's recycling and composting program, as UC Law SF currently does. All residents and businesses have a three-stream materials collection system with recyclables in blue bins, compostable materials such as food scraps and yard trimmings in green bins, and garbage in black or grey bins. These materials are currently collected by Recology through its subsidiaries: San Francisco Recycling and Disposal, Golden Gate Disposal, and Sunset Scavenger. San Francisco is currently reevaluating its contract with Recology and has entered into an agreement with Allied Waste Industries to collect solid waste from San Francisco-owned properties.

All collected materials are transported to the Recology Transfer Station located at 515 Tunnel Avenue for sorting and subsequent transport to other facilities. The Recology Transfer Station is also a construction and demolition debris recycling facility. Recyclable materials are shipped to Recology Central/Pier 96, which is a materials recovery facility that extracts recyclables from the waste stream and sells them to manufacturers that turn the materials into new products. Compostable materials (food scraps and landscape debris) are transported to Recology's Blossom Valley Organics near Vernalis, California. There, the contaminants are separated from the organic material, which is then shredded, laid out in windrows, and converted to compost. After 60 days, the compost material is sold to local farmers as soil amendment.

In the past, most of the solid waste that is classified as garbage was transported to Altamont Landfill. As Altamont Landfill is reaching the end of its life, most of the garbage generated in San Francisco is now transported to the Recology Hay Road Landfill in Vacaville, California. In 2019, the last available year of record, CalRecycle stated that 418,540 tons of garbage were transported to Recology Hay Road Landfill from San Francisco. This represents approximately 59 percent of the garbage generated in San Francisco; there are 23 other landfills that accept much smaller amounts of solid waste from San Francisco.

The Recology Hay Road Landfill has a permitted capacity of 2,400 tons/day and a remaining capacity of 30,433,000 cubic yards. The closure date for this landfill is January 2077. Assuming the landfill operates every day of the year except for three holidays, the calculated daily disposal rate is about 1,730 tons/day.

San Francisco's per capita disposal rates of 3.1 pounds per day (ppd) per resident and 3.8 ppd per employee are well below CalRecycle's target rates of 6.6 ppd per resident and 10.6 ppd per employee. The estimated solid waste generation rate for the Academic Light variant (831 residents and 453 employees plus visitors) is estimated to be 4,299 lb/day.[36] The solid waste generation rate for the Academic Heavy variant (492 residents and 907 employees plus visitors) is calculated to be 4,971 lb/day.[37] Assuming San Francisco's current landfill diversion rate of 80 percent, this would result in landfill disposal of 860 ppd for the Academic Light variant and 994 ppd for the Academic Heavy variant.[38] If it is assumed that all of the landfill waste goes to Recology Hay Road Landfill, this would amount in an increase of 0.4 tons/day for the Academic Light variant and 0.5 tons/day for the Academic Heavy variant. Since Recology Hay Road Landfill currently receives approximately 1,720 tons/day of solid waste and has a permitted capacity of 2,400

[36] 831 residents x 3.1 ppd = 2,577 ppd; 453 employees plus visitors x 3.8 ppd = 1,721 ppd. 2,577 ppd + 1,721 ppd = 4,299 ppd.

[37] 492 residents x 3.1 ppd = 1,524 ppd; 907 employees plus visitors x 3.8 ppd = 3,447 ppd. 1,524 ppd + 3,447 ppd = 4,971 ppd.

[38] 4,299 ppd x 0.20 = 860 ppd. 4,971 ppd x 0.20 = 994 ppd.

tons/day, this is more than enough residual capacity to accept the solid waste from the project. In addition, San Francisco is striving to reach its zero-waste goal, which means recycling, composting, reusing, and reducing consumption so that no waste is sent to landfills.

In summary, the project would not 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 Therefore, impacts would be *less than significant*.

e) As discussed in detail in standard of significance (d), San Francisco is currently in compliance with all federal, state, and local management and reduction statutes and regulations related to solid waste and is the nation's leader in diverting waste from landfills with a diversion rate of 80 percent. San Francisco is also well below the CalRecycle target levels for solid waste disposal by residents and employees, which are 6.6 ppd per resident and 10.6 ppd per employee. Actual disposal rates in San Francisco are 3.1 ppd per resident and 3.8 ppd per employee. San Francisco also has numerous statutes and ordinances to further minimize the generation of solid waste, as described in detail in XIX(d).

The proposed mixed-use development would generate less than 0.5 tons/day of solid waste, which is well within the capacity of Recology Hay Road Landfill. Also, the project would divert a minimum of 75 percent of construction debris from the landfill, which is greater than the CALGreen requirement of 65 percent diversion. With continued efforts by San Francisco to meet its zero waste sustainability goal and the minimal amount of solid waste generated by the project, the project would comply with all applicable federal and state regulations regarding solid waste and impacts would be *less than significant.*

XXI. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	❒	❒	■
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?	❒	❒	■

DISCUSSION

a), b), c), and d) As discussed in Section IX, *Hazards and Hazardous Materials*, the project site is not located in or near a State Responsibility Area, nor is it located within a very high fire-hazard severity zone.[39] Therefore there would be *no impact* and this topic will not be addressed in the EIR.

XXII. WIND

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
a) Create wind hazards in publicly accessible areas of substantial pedestrian use?	■	❒	❒

DISCUSSION

a) A proposed project's wind impacts are directly related to its height, orientation, design, location, and surrounding development context. CEQA does not recognize impacts from wind on an existing building or space. However, due to the dense urban setting and variation of building heights and the potential for wind tunnel effects to generate strong winds that can cause harm, San Francisco considers impacts from wind that could adversely impact the environment. Based on wind analyses for other development projects in San Francisco, a building that does not exceed a height of 85 feet generally has little potential to cause substantial changes to ground-level wind conditions. Because the proposed 201 Golden Gate Avenue Mixed-Use Project includes a new building up to 153 feet (approximately 14 stories), there is the potential for an impact from wind and this standard of significance will be evaluated in the EIR.

XXIII. MANDATORY FINDINGS OF SIGNIFICANCE

Would the proposed project:	Potentially Significant Impact	Less than Significant	No Impact
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 that will cause substantial adverse effects on human beings, either directly or indirectly?	■	❒	❒

[39] Cal Fire, Fire Hazard Severity Area Map Viewer, Available at https://egis.fire.ca.gov/FHSZ/, accessed May 9, 2022.

DISCUSSION

a) As discussed in Section IV, *Biological Resources*, the project site is fully covered with impervious surfaces and is located within a built urban environment. While there are street trees around the property, the project site does not provide any habitat for fish or wildlife species. The project would retain existing street trees if possible, and replace them if removal is necessary. Therefore, the project would not substantially reduce habitat, cause a fish or wildfire population level to drop, eliminate a plant or animal community, reduce the number of a rare or endangered plant or animal, or restrict the range of any rare or endangered plant or animal. The EIR will evaluate the potential for the project to degrade the quality of the environment as it pertains to air quality, cultural resources (including historic resources), tribal cultural resources, geology and soils, GHG emissions, hydrology and water quality, noise, shadow, transportation, and wind.

b and c) The EIR will evaluate potential impacts related to air quality, cultural resources, tribal cultural resources, geology and soils, GHG emissions, hydrology and water quality, noise, shadow, transportation, and wind, including direct and indirect adverse effects on human beings as well as cumulative impacts.

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