San Francisco Planning

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

PUBLIC NOTICE

NOTICE OF AVAILABILITY OF AND INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

PROJECT INFORMATION

Date:	October 18, 2023
Project Title:	***545 Sansome Street and 501-505 Washington Street***
Case No.:	**2020-001410ENV**
Block/Lot No.:	0207/035 and 0207/036
Zoning District(s):	C-3-O (Downtown Office) Use District 200-S Height and Bulk District
Neighborhood:	Financial District

Project Sponsor:
Tara Sullivan, Reuben, Junius & Rose, LLP
tsullivan@reubenlaw.com, (415) 567-9000

Environmental Case Coordinator:
Ryan Shum, San Francisco Planning Department
ryan.shum@sfgov.org, (628) 652-7542

The San Francisco Planning Department has studied this project's potential physical environmental effects and welcomes your comments on the adequacy of the preliminary mitigated negative declaration (PMND). Refer to the Project Description and Purpose of Notice sections below for more information.

Project Description

A PMND has been prepared by San Francisco Planning in connection with this project as required by the California Environmental Quality Act (CEQA) to study the project's potential physical environmental effects.

The proposed project would make horizontal and vertical additions to expand the existing historic building at 545 Sansome Street by adding 49,977 net new square feet of office space and 2,979 net new square feet of ground floor retail to the existing building. Additionally, the project would create a new 1,250 square-foot Privately Owned Public Open Space adjacent to Transamerica Redwood Park.

The document is a PMND, containing information about the possible environmental effects of the proposed project. The PMND documents the determination by the Planning Department that the proposed project could not have a significant adverse effect on the environment. The publication of this environmental document does not indicate a decision by the City to approve or disapprove the proposed project.

Purpose of Notice

The PMND is available to view or download from the Planning Department's Negative Declarations and EIRs web page (http://www.sf-planning.org/sfceqadocs). Paper copies are also available at the Planning counter of the San Francisco Permit Center on the second floor of 49 South Van Ness Avenue, San Francisco.

Environmental review focuses on the physical *environmental effects* of the project. Comments regarding your like or dislike of the project or if you think officials should approve or disapprove the project will not be addressed in the environmental review document. Instead, we encourage you to provide these comments to the planner assigned to review the project for *planning code and general plan compliance*. The current planner for this project is Claire Feeney (claire.feeney@sfgov.org, 628-652-7313). If you have questions concerning environmental review of the proposed project, contact the Planning Department staff contact listed above.

You are not required to take any action. If you wish to comment on the adequacy of the PMND, within 20 calendar days following publication of the PMND (by 5:00 p.m. on November 7), any person may:

1. Make recommendations for amending the text of the document. The text of the PMND may be amended to clarify or correct statements and may be expanded to include additional relevant issues or to cover issues in greater depth. This may be done **without** the appeal described below; **OR**

2. Appeal the determination of no significant effect on the environment to the Planning Commission in a letter which specifies the grounds for such appeal, accompanied by a $698 check payable to the San Francisco Planning Department.[1] An appeal requires the Planning Commission to determine whether or not an Environmental Impact Report must be prepared based upon whether or not the proposed project could cause a substantial adverse change in the environment. To file, send the appeal letter to the Planning Department, Attention: Lisa Gibson, 49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103 or emailed to lisa.gibson@sfgov.org and **must be received by 5:00 p.m. on November 7.**

In the absence of an appeal, the mitigated negative declaration shall be made final, subject to necessary modifications, after 20 days from the date of publication of the PMND. If the PMND is appealed, the Final Mitigated Negative Declaration (FMND) may be appealed to the Board of Supervisors. The first approval action, as identified in the initial study, would establish the start of the 30-day appeal period for the FMND pursuant to San Francisco Administrative Code Section 31.16(d).

Members of the public are not required to provide personal identifying information when they communicate with the Commission or the Department. All written or oral communications, including submitted personal contact information, may be made available to the public for inspection and copying upon request and may appear on the Department's website or in other public documents.

1 Upon review by the Planning Department, the appeal fee may be reimbursed for neighborhood organizations that have been in existence for a minimum of 24 months.

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PRELIMINARY MITIGATED NEGATIVE DECLARATION

Case No.:	2020-001410ENV
Project Address:	545 Sansome Street
Zoning:	C-3-O (Downtown Office) Use District
Height/Bulk:	200-S Height and Bulk District
Block/Lot:	0207/035 and 0207/036
Lot Size:	14,480 square feet
Project Sponsor:	Tara Sullivan, Reuben, Junius & Rose, LLP on behalf of SHVO 415.567.9000, tsullivan@reubenlaw.com
Staff Contact:	Ryan Shum, 628.652.7542, ryan.shum@sfgov.org

Project Description

The approximately 14,480-square-foot project site consists of two lots (block/lots 0207/035 and 0207/036) and has frontage on Washington Street, Sansome Street, and Mark Twain Alley. It is located on the block bounded by Washington Street to the north, Sansome Street to the east, Clay Street to the south, and Montgomery Street to the west. The site is currently developed with a nine-story, approximately 105-foot-tall (exclusive of the mechanical rooftop), 55,247-gross-square-foot (gsf) historic, mixed-use commercial and office building within a C-3-O zoning designation.[1] The historic building (545 Sansome Street) contains 55,247 square feet of office space, and 3,431 square feet of ground floor retail space. The project site also contains one single-story retail building (501-505 Washington Street, a portion of Lot 35), and a concrete-capped basement (517 Washington Street, Lot 36). No off-street parking or loading zones exist on the site.

The proposed project would make horizontal and vertical additions to expand the existing building at 545 Sansome Street by adding 49,977 net new square feet of office space and 2,979 net new square feet of ground floor retail to the existing building. Additionally, the project would create a new 1,250 square-foot Privately Owned Public Open Space adjacent to Transamerica Redwood Park. The attached Initial Study (Attachment A) contains a comprehensive project description, including figures, and a list of anticipated project approvals.

Finding

This proposed project could not have a significant effect on the environment. This finding is based upon the criteria of California Environmental Quality Act (CEQA) Guidelines, Section 15064 (Determining the Significance of the Environmental Effects Caused by a Project), Section 15065 (Mandatory Findings of Significance), and Section 15070 (Decision to Prepare a Negative Declaration or Mitigated Negative Declaration), and the following reasons as documented in the Initial Evaluation (Initial Study) for the proposed project, which is attached.

[1] Gross square footage is calculated accounting for allowable floor area deductions per Planning Code Section 102 (a) (14).

Mitigation measures are included in this proposed project to avoid potentially significant effects. See Attachment B Mitigation Agreement and Mitigation Monitoring and Reporting Program for the full text of the project's mitigation measures.

cc: Supervisor Aaron Peskin, District 3

Attachments

Attachment A – Initial Study
Attachment B – Mitigation Monitoring and Reporting Program

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ATTACHMENT A
INITIAL STUDY

545 Sansome Street Project
Planning Department Case No. 2020-001410ENV

Table of Contents

List of Tables

List of Figures

ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Details
$\mu g/m^3$	micrograms per liter
ABAG	Association of Bay Area Governments
AB	Assembly Bill
ADA	Americans with Disabilities Act
APEZ	Air Pollution Exposure Zone
bgs	below ground surface
BMP	Best Management Practice
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Occupational Safety and Health Administration
Caltrans	California Department of Transportation
CARE	Criteria Air Risk Evaluation
CBC	California Building Standards Code
CDC	Center of Disease Control and Prevention
CDFW	California Department of Fish and Wildlife
CDMG	California Division of Mines and Geology
CEQA	California Environmental Quality Act
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CNPSEI	California Native Plant Society Electronic Inventory
CRHR	California Register of Historical Resources
CWA	Clean Water Act
DOC	California Department of Conservation
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
EDD	California Employment Development Department
EPA	United States Environmental Protection Agency
ERO	Environmental Review Officer
ESA	Environmental Site Assessment
FAR	floor area ratio

Acronym/Abbreviation	Details
FTA	Federal Transit Administration
GHG	greenhouse gas
GPCD	gallons per capita per day
gpd	gallons per day
gsf	gross square feet
HCD	California Department of Housing and Community Development
HRA	Health Risk Assessment
HRE	Historical Resource Evaluation
HRER	Historical Resource Evaluation Response
HVAC	heating, ventilation, and air conditioning
MBTA	Migratory Bird Treaty Act
mgd	million gallons per day
MMRP	Mitigation Monitoring and Reporting Program
mph	miles per hour
MRZ	Mineral Resource Zone
MTC	Metropolitan Transportation Commission
NO_2	nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRHP	National Register of Historic Places
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PG&E	Pacific Gas and Electric Company
PM_{10}	particulate matter less than 10 microns in diameter
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
POPOS	Privately Owned Public Open Space
PPV	peak particle velocity
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Condition
ROG	reactive organic gases
RWQCB	Regional Water Quality Control Board
SF-CHAMP	San Francisco Chained Activity Model Process

Acronym/Abbreviation	Details
sfh	square foot hours
SFMTA	San Francisco Municipal Transportation Agency
SFPD	San Francisco Police Department
SFPUC	San Francisco Public Utilities Commission
SFRPD	San Francisco Recreation and Parks Department
SO_2	Sulfur dioxide
SP-117A	Special Publication 117A
SRA	State Responsibility Area
State Water Board	California State Water Resources Control Board
TAAS	Theoretical Annual Available Sunlight
TAC	toxic air contaminant
TAZ	Transportation Analysis Zone
TNC	Transportation Network Company
USDOT	United States Department of Transportation
USGS	United States Geologic Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
WRAP	Western Regional Air Partnership
WRF	Weather Research and Forecasting
WSA	Water Supply Assessment

A. PROJECT DESCRIPTION

Project Location

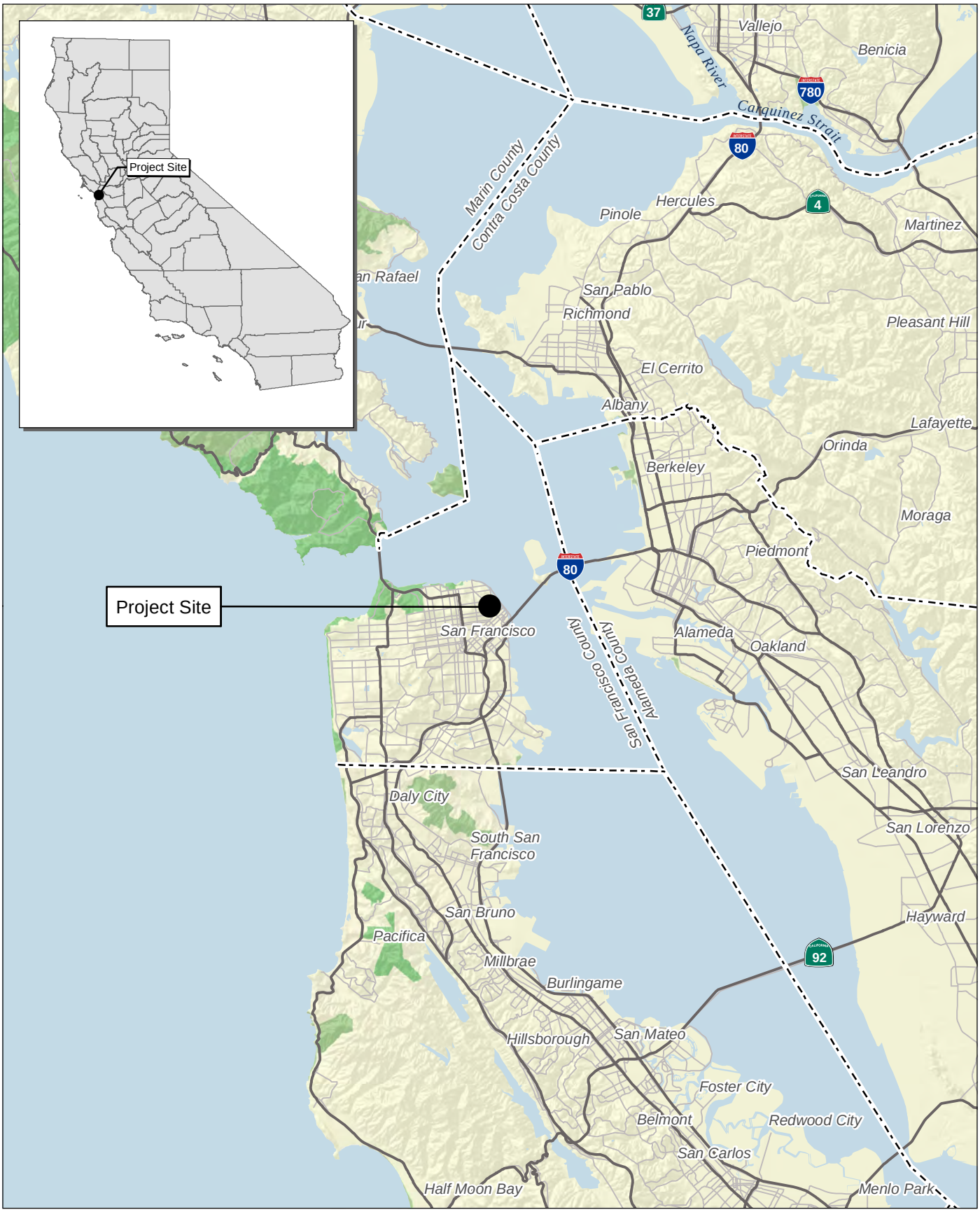
The approximately 14,480-square-foot project site consists of two lots (block/lots 0207/035 and 0207/036) and has frontage on Washington Street, Sansome Street, and Mark Twain Alley. It is located on the block bounded by Washington Street to the north, Sansome Street to the east, Clay Street to the south, and Montgomery Street to the west. Figures 1 and 2 illustrate the project site and vicinity. The project site is currently developed with three structures: a 9-story, approximately 105-foot-tall (exclusive of the mechanical rooftop), 55,247 gsf historic, mixed-use commercial and office building (545 Sansome Street); a single-story, approximately 1,910-square-foot retail building (501-505 Washington Street); and a concrete-capped basement (517 Washington Street). 545 Sansome Street contains 55,247 square feet of office space, and 3,431 square feet of ground floor retail space. No off-street parking or loading zones exist on the site. Figure 4 shows the existing site plan, and Figure 5 shows the proposed site plan. Figures 7 through 10 show proposed floor plans, elevations, building sections, and a conceptual landscape plan.

Project Characteristics

The proposed project would modernize, upgrade, and expand the historic building at 545 Sansome Street for office and ground floor retail use, and create a new Privately Owned Public Open Space (POPOS) adjacent to Transamerica Redwood Park at 535 Washington Street. The proposed POPOS would connect to Transamerica Redwood Park and function as an extension of the park. The project proposes to demolish the existing single-story retail building (at 501-505 Washington Street) and the 6,204-square-foot concrete-capped basement on-site (at 517 Washington Street) and expand the existing nine-story commercial and office building into a 15-story (14 stories plus penthouse), approximately 198-foot-tall mixed-use office building with ground floor retail uses, excluding its mechanical penthouse. The resulting 127,602 gross-square-foot building would provide approximately 6,410 square feet of ground floor retail space and 105,224 gross square feet of office space.

545 Sansome's primary historic façades fronting Sansome Street and Mark Twain Alley would be retained, along with the majority of its internal floorplates. However, portions of its non-primary façades would be removed to extend the building façade to meet Washington Street. Additionally, the proposed project would include a new building core and structural upgrades to improve the building's structural integrity and life safety systems and allow for a 6-story vertical addition that would be set back from the historic façades on Sansome and Mark Twain Alley.

In total, the proposed project would add 49,977 net new square feet of office space, 2,979 net new square feet of ground-floor retail, 1,250 square feet of POPOS, 21,361 square feet of private open space, 22 class 1 and six class 2 bike parking spaces, and no automobile parking spaces. The basement level would accommodate a backup diesel generator for the building, main electrical room, bicycle storage with men's and women's changing rooms with showers and lockers, a staff lounge, building storage, and tenant storage space.



Source: Census 2000 Data, The California Spatial Information Library (CaSIL).

5 2.5 0 5 Miles

Figure 1
Regional Location Map

Source: Bing Aerial Imagery.

1,000 500 0 1,000 Feet

Figure 2
Local Vicinity Map

Table 1: Proposed Project Characteristics

Project Component	Existing[a]	Proposed	Net Change
Height of Building	105 feet	198 feet[b]	93 feet
Number of Stories	9 (+ 1 basement level)	14 (+ 1 basement level and penthouse)	5
Office	55,247 sf	105,224 sf	49,977 sf
Retail	3,431 sf	6,410 sf	2,979 sf
Above Grade	55,247 sf	102,312 sf	47,065 sf
Below Grade	5,811 sf	2,912 sf	-2,899 sf
Privately Owned Public Open Space (POPOS)	–	1,250 sf	1,250 sf
Private Open Space	–	21,361 sf	21,361 sf
Class 1 Bicycle Parking Spaces[c]	–	22	22
Class 2 Bicycle Parking Spaces[c]	–	6	6

Notes:
[a] sf = square feet
[b] Excluding parapet and rooftop mechanical structures
[c] Minimum bicycle parking is calculated per San Francisco Planning Section 155.2.
Sources: SHVO and Foster + Partners. 2023. 3 Transamerica, 545 Sansome Street–Planning Submission. April.

Open Space Improvements

The proposed project would provide a new 1,250-square-foot POPOS designed as an urban garden to act as an extension to Transamerica Redwood Park, which abuts the project site. Flooring, planting, and fencing in the POPOS facing Redwood Park and Washington Street would be designed to complement existing park features. The proposed project includes an additional 1,860 square feet of private open space would be located south of the POPOS and could include outdoor seating for the proposed project site's new cafés or restaurants.

Streetscape Improvements

The proposed project would plant four new street trees on Washington Street, and four new street trees on Sansome Street. In addition, the proposed project would extend the existing approximately 10-foot-wide sidewalk on Washington Street along the project frontage to be approximately 13 feet wide. The existing curb ramp at the southwest corner of the Washington and Sansome streets intersection will be improved or replaced to meet City standards as needed. The proposed project would provide six class 2 bicycle parking spaces in the public right-of-way along Washington Street.

On-street Loading

The existing 36-foot yellow loading zone on Washington Street fronting the project site would remain to accommodate on-street loading for the proposed project. The loading zone would accommodate two average-sized delivery trucks.

Construction

Construction is anticipated to occur over a period of approximately 28 months beginning in the first quarter of 2024. The existing building at 545 Sansome Street would not be occupied during construction. The project sponsor has enrolled in the Director Bulletin No. 2 (DB2) program, also referred to as "Type 3" priority projects. Clean Construction Projects are projects that need to use diesel construction equipment but choose to make a voluntary pre-approval commitment to use low-emission diesel construction equipment. These projects are in turn afforded an expedited review process and the application for this project was accepted on May 17, 2023.

Construction of the proposed project would require demolition of an adjacent single-story retail building at 501-505 Washington Street; the currently operating restaurant on-site would be vacated by the end of 2023. The gross square footage of this existing building is approximately 1,910 square feet. A concrete-capped basement at 517 Washington Street would also be demolished. The gross square footage of this feature is approximately 6,204 square feet. The total amount of demolition associated with the removal of these existing structures is approximately 8,114 square feet.

Construction of a new core and structural upgrades to the existing building at 545 Sansome Street would also require the partial demolition of this structure, including demolition of its existing first floor office and retail space. Construction of the horizontal and 6-story vertical additions would also require varying degrees of demolition activities throughout the building. To be conservative, it is estimated that up to 33 percent of this building's gross square footage may be demolished. The total amount of demolition in the 545 Sansome Street building is approximately 42,108 square feet.[2] Combined with the demolition of adjacent structures, the total amount of demolition required by the proposed project is approximately 50,222 square feet.

The area of excavation would be 10,360 square feet and 2,900 cubic yards of soil would be exported from the project site. The maximum depth of excavation would be 13 feet and foundation work would include augured cast-in-place piles or micropiles. Building foundations would extend to between approximately 80 and 165 feet below ground, depending on the building foundation type used.

During construction, debris haul trucks would access the site via Mark Twain Alley. The sidewalk and parking/far left lane along the project site on Washington Street would be subject to temporary closure during demolition activities (approximately from months one through nine). The sidewalk along Sansome Street would similarly be closed during demolition activities. A 4-foot-wide pedestrian access walkway would be constructed outside of the closure on both Washington Street and Sansome Street to allow continuous pedestrian access. If the fire station at 530 Sansome Street is operating at the time of project construction, a protection barricade would be maintained on the existing sidewalk and the existing sidewalk would remain open. However, if the fire station is temporarily relocated prior to commencement of construction as part of the approved 530 Sansome Street project (Planning Department Case No. 2019-017481PRJ), a temporary protection barricade would be extended to include the sidewalk and existing parking lane.

[2] Partial demolition of existing building at 545 Sansome Street would include the existing retail space, and elements of interior and exterior space. Thus, the total amount of demolition was derived from the building's exterior ground square footage of 127,602 square feet, which includes all building areas excluded from the gross square footage calculations under Planning Code Section 102(a)(14).

Project Approvals

The proposed project would require the following approvals:

Planning Commission Actions:

- Approval of Downtown Project Authorization under Planning Code Section 309.
    - The proposed project must satisfy (or obtain an exception from) the following Planning Code Requirements for Approval by the Planning Commission:
        - Floor Area Requirements (Sections 102, 123, 124)
        - Setback and Streetwall Requirements (Section 132.1)
        - POPOS Support Requirements (Section 138)
        - Streetscape Plan (Section 138.1)
        - Bird-Safe Building Standards (Section 139)
        - Rooftop Screening (Section 141)
        - Street Frontage Requirements (Section 145.1)
        - Sunlight, Shadow and Wind Requirements (Sections 146, 147, 148)
        - Off-Street Loading Requirements (Sections 152.1, 154, 155d, 155f, and 155s)
        - Bicycle Parking Requirements (Section 155.2)
        - Shower and Locker Requirements (Section 155.4)
        - Transportation Demand Management Plan (Section 169)
        - Height Limit Requirements (Section 260)
        - Public Art Fee Requirement (Section 429)
- Approval of Shadow Impacts on Property under the jurisdiction of the Recreation and Park Commission (Planning Code Section 295).
- Approval of Office Development Allocation, subject to Annual Limit (Planning Code Section 320, 321, and 322).
- Joint Action by the Planning Commission and Recreation and Parks Commission.
- Approval of increase to annual cumulative shadow limit for Maritime Plaza.

Action by Department of Building Inspection

- Approval of building permit(s).

Actions by Municipal Transportation Agency

- Approval of permits for streetscape modifications in the public right-of-way.
- Approval of parking and traffic changes including color curb zones.

Actions by Department of Public Works

- Approval of permits for streetscape modifications in the public right-of-way.
- Approval of new street trees.
- Approval of any situations involving construction that would need to extend beyond normal hours (i.e., between 8:00 p.m. and 7:00 a.m.), which could include concrete pours, crane and hoist erection and adjustment activities, site maintenance activities and material delivery and handling.

Action by Department of Public Health

- Approval of site mitigation plan pursuant to Maher Ordinance.

Action by Bay Area Quality Management District

- Issuance of permits for the installation and operation of emergency generators.

Approval Action

- Approval of the Downtown Project Authorization by the planning commission would constitute the approval action.

B. PROJECT SETTING

Project Site and Surrounding Land Uses

The project site is located in the Financial District neighborhood of San Francisco. The site is currently developed with a nine-story, approximately 105-foot-tall (exclusive of the mechanical rooftop), 55,247 gross-square-foot historic, mixed-use commercial and office building within a C-3-O zoning designation.[3] The historic building (545 Sansome Street) contains 55,247 square feet of office space, and 3,431 square feet of ground floor retail space. The project site also contains one single-story retail building (501-505 Washington Street, a portion of Lot 35), and a concrete-capped basement (517 Washington Street, Lot 36). No off-street parking or loading zones exist on the site. Vehicular access to the site is provided via Washington Street and Sansome Street. Pedestrian access to the single-story retail building at 501-505 Washington Street is available via a pedestrian alley to the south of the building. Pedestrian access to 545 Sansome Street is via entrances on Sansome Street. Mark Twain Alley provides vehicular access for trash, loading, and other building operations for 545 Sansome Street and the adjacent 505 Sansome Street building.

The project site is located adjacent to the 48-story Transamerica Pyramid and Transamerica Redwood Park to the immediate west and is within the 200-S height and bulk district, which limits building heights to 200 feet. The buildings to the east are subject to the same 200-S height and bulk district. To the north of the project site, buildings fall under the 65-A height and bulk district, which limits building heights to a maximum of 65 feet. South of the project site, the nearby buildings fall under height and bulk districts 75-X and 250-S, which provides a wide range of building heights from 75 feet to 250 feet of maximum build height. The project vicinity is generally characterized by mixed-use buildings with retail businesses at the ground level and offices in the upper levels.

The project site is within the C-3-O–Downtown–Office zoning district, which provides high-quality, high-intensity office development, supported by some retail and service use. Other surrounding districts include C-2 – Community Business, CCB – Chinatown-Community Business, and RC-4 – Residential-Commercial, High Density.[4]

[3] Gross square footage is calculated accounting for allowable floor area deductions per Planning Code Section 102 (a) (14).

[4] City and County of San Francisco. 2022. San Francisco Property Information Map. Website: https://sfplanninggis.org/pim/. Accessed July 25, 2023.

Surrounding Transportation Network

The project block is bounded by Sansome Street to the east, Washington Street to the north, Montgomery Street to the west, and Clay Street to the south. Sansome Street is a north–south, two-way street, with two to three lanes running north and one lane running south. Washington Street is an east–west, one-way, two-lane street. Similarly, Clay Street is an east–west, one-way, two-lane street. Montgomery Street is a two- to three-lane street running north–south. All on-street parking in the project area is metered and subject to time restrictions, except for law enforcement vehicles. Interstate 80 (I-80) (the San Francisco/Oakland Bay Bridge) is located to the southeast. There are currently five on-street parking spaces along the project frontage on Washington Street. There are no on-street parking or loading spaces along the project frontage on Sansome Street because the entire frontage is a designated red zone to provide unobstructed access for Fire Department Station 13 located directly on the opposite side of Sansome Street.

The proposed project is well-served by public transportation. Muni's 12 Folsom-Pacific bus route operates along Sansome Street. Within 0.25-mile of the project site, Muni also operates the following lines: the 1 California, the 41 Union, the 8 Bayshore, and specialized variants of the 30 Stockton, 31 Balboa, 38 Geary, and 82X Levi Plaza Express. The California Cable Car historic route also passes within 0.25-mile of the project site. Sansome Street is classified as Transit-Oriented, and nearby Clay Street is classified as a Secondary Transit Street under the Transit Preferential Streets classification, a program which seeks to enhance public transit on said streets.[5] Within 200 feet of the project site, class 3 bikeways can be found on Washington Street, Sansome Street, and Clay Street. Multiple bikeways of classes 1, 2, and 3 are found within 0.5-mile of the project site. Two Bay Area Bike Share stations can be found within 1,000 feet: a 19-dock station at Commercial Street and Montgomery Street, and a 31-dock station at Clay Street and Battery Street.

The project site is located approximately 0.4-mile west of the San Francisco Ferry Building, where the San Francisco Bay Ferry has four gates that service Vallejo, Richmond, Harbor Bay (Alameda), and Alameda/Oakland. In addition, Golden Gate Ferry operates ferry services to Larkspur, Sausalito, and Tiburon. Class 3 bicycle routes are located along Sansome Street in both directions between Washington and Market streets. A San Francisco bikeshare station is located at Clay and Battery streets southeast of the project site.

Cumulative Context

CEQA Guidelines Section 15130(b)(1) provides two methods for cumulative impact analysis: the "list-based approach" and the "projections-based approach." The list-based approach uses a list of projects (within approximately 0.25-mile radius of the project site and for which the Planning Department has a project application on file) that could produce impacts that could combine with those of the proposed project to result in significant cumulative impacts. The projections-based approach uses projections contained in a general plan or related planning document to evaluate the potential for cumulative impacts. This analysis employs both the list-based and projections-based approaches, depending on which approach best suits the resource topic being analyzed.

The cumulative analysis for certain localized impact topics (e.g., cumulative shadow and wind effects) uses the list-based approach. The following is a list of reasonably foreseeable projects within the project vicinity that are included. These projects are currently under review by the Planning Department or are entitled but

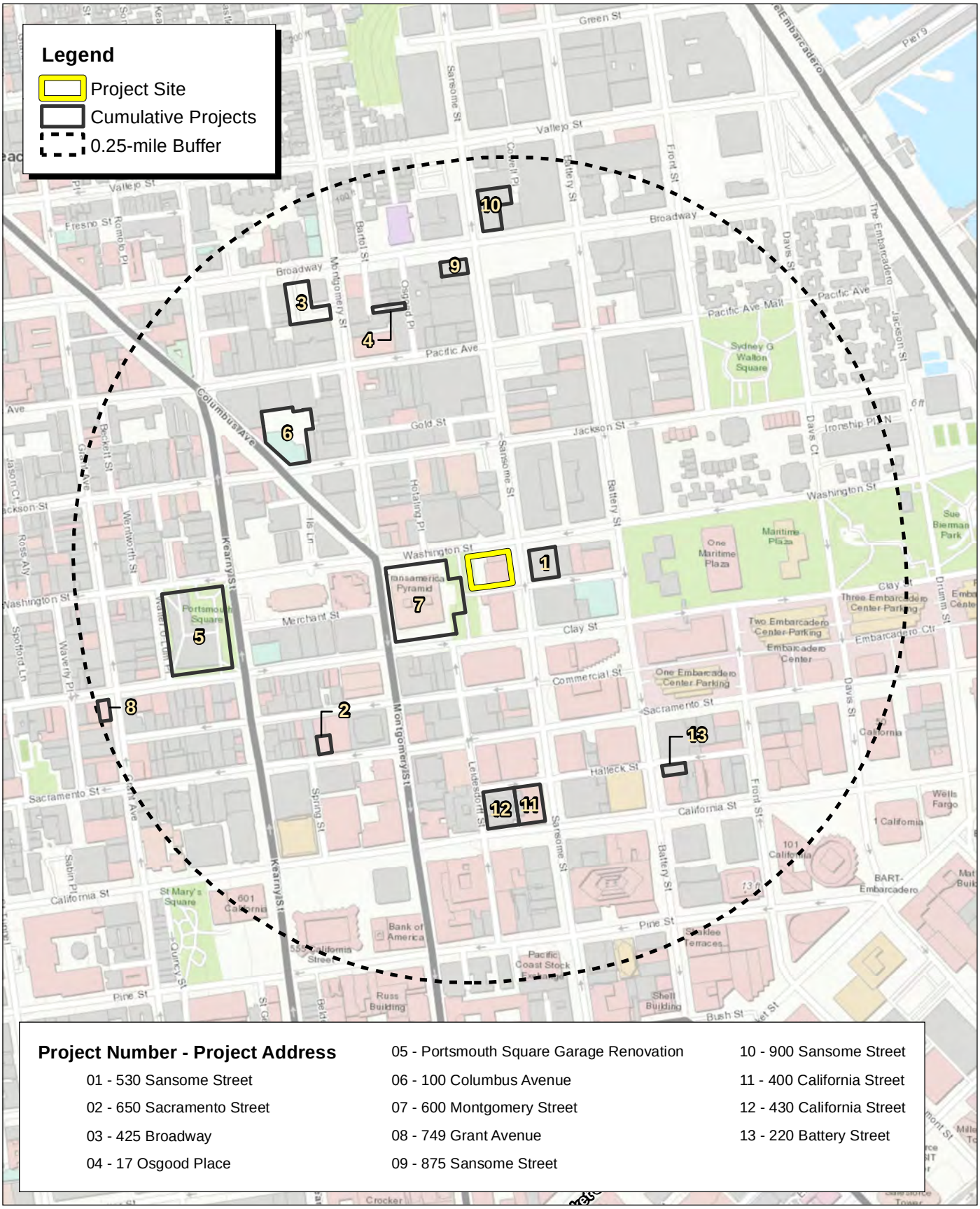
[5] San Francisco Planning Department, San Francisco General Plan Transportation Element (2018), available online at https://generalplan.sfplanning.org/I4_Transportation.htm. Accessed July 25, 2023.

not yet under construction. The potential cumulative effects of these projects are addressed, as appropriate, under each environmental topic herein. Figure 3 presents a map showing the relative locations of the cumulative projects.

Table 2: Cumulative Projects

Project Address	Description
530 Sansome Street	**Case no. 2019-017481PRJ** Demolition of existing structures and construction of a 17-story mixed-use hotel and office tower that would include an approximately 200-room hotel, approximately 38,000-square-foot fitness retail club, approximately 40,000 square feet of office space, and a ground floor restaurant. The project would also include a new approximately 28,000-square-foot Fire Station 13. This project also includes a residential variant, which would construct 256 residential units instead of the hotel, office, fitness center, and retail/restaurant uses in the approximately 218-foot-tall building.
650 Sacramento Street	**Case No. 2019-019614PRJ** Replacement of existing ground floor storefront, elevator, stairs, and restrooms for accessibility. Project would also conduct seismic upgrade to existing office building with approximately 16 micropiles.
425 Broadway	**Case No. 2017-015678PPA** Replace existing parking garage structure with a 35-unit multi-family building with an accessory parking garage, two-story gym and theater.
17 Osgood Place	**Case No. 2017-001423ENV** Renovation of and addition to existing building to convert ground floor commercial space to one-bedroom residential unit and merge two existing residential units into one two-bedroom residential unit. No change to unit count or height of the building.
733 Kearny Street	**Case No. 2018-013597ENV** Portsmouth Square Garage Renovation. Renovation of the existing 1.5-acre Portsmouth Square Park and removal of the pedestrian bridge spanning Kearny Street, replace the existing park features with a redesigned public park that would include new playgrounds, exercise equipment, shade structures, wayfinding signage, sidewalks, planters, terraces, ramps, and construct a new approximately 7,500-square-foot community clubhouse facility.
100 Columbus Avenue	**Case No. 2022-004374CUA** Change a public parking lot use to a single-story office building with surrounding landscaping in the rear open area.
600 Montgomery Street	**Case No. 2021-011126ENV** Remodel building lobby, including entire ground floor storefront, structural and nonstructural demolition, and relocation of egress stair discharges.
749 Grant Avenue	**Case No. 2019-003978ENV** Addition of two stories to existing two-story commercial building for residential use. Building would contain six residential units and 4,676 square feet of commercial use.
875 Sansome Street	**Case No. 2017-003622PPA** Demolition of existing office building, and construction of six-story mixed-use building.
900 Sansome Street	**Case No. 2020-009619ENV** Convert existing two-story 28,863-square-foot parking garage to office use, including a new elevator, building entrance, and bathroom upgrade.

Project Address	Description
400 California Street	**Case No. 2020-010710PRJ** Conversion of 9,330 square feet of ground floor space to office use. The property consists of the historic two-story Bank of California building (the bank) and adjacent 21-story office tower located at 430 California Street, which connected to the bank via two openings on the ground floor. The conversion to office space would retain the bank's historic features.
220 Battery Street	**Case No. 2017-004065ENV** Construction of a 3,260-square-foot 4-story vertical addition atop the existing two-story structure. No change to office use of existing building.
Source: City and County of San Francisco Planning Department, 2023.	



Source: ESRI World Topographic Imagery.

460 230 0 460 Feet

Figure 3
Cumulative Projects Map

C. COMPATIBILITY WITH EXISTING ZONING AND PLANS

Local Plans and Policies

San Francisco Planning Code and Zoning Maps

The planning code, which incorporates by reference the City's zoning maps, governs permitted uses, densities, and the configuration of buildings in San Francisco. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless either the proposed action conforms to the planning code, or an exception is granted pursuant to provisions of the planning code.

Land Use

Pursuant to Planning Code Section 210.2, the C-3-O District is composed primarily of high-intensity and high-quality office development, with some retail and service uses being supported throughout. Much of the office development serves citywide, regional, and national functions, serving as a center for finance, corporate headquarters, service industries, and a major employment hub for the region. As in the case of other downtown districts, the District is primarily served by City and regional transit, supplemented by automobile parking at peripheral locations. The intensity and compactness of the district enables face-to-face business contacts via foot travel.

The proposed mixed office and retail use of the proposed project are principally permitted uses pursuant to Table 210.2 of the planning code.

Height and Bulk

The project site is in a 200-S height and bulk district, which permits a maximum building height of 200 feet.

The height of the proposed project roof would be slightly more than 198 feet, excluding its mechanical penthouse. Together with the 15-foot-tall rooftop mechanical penthouse, the height of the proposed building would reach up to approximately 214 feet at its highest point. The proposed 15-foot-tall mechanical penthouse would not exceed the 16-foot allowable height for elevator penthouses under Planning Code Section 260(b)(1)(B). The mechanical penthouse features also occupy an area of 30 percent with an unroofed screened area, meeting the allowed 30 percent horizontal area permitted under Planning Code Section 260(b)(1)(B).

Floor Area Ratio

The basic floor area ratio (FAR) for the C-3-O District is 9:1 under Planning Code Section 210.2. As such, the base FAR for this 14,480-square-foot site would allow for development of a building with a gross floor area of up to 130,320 gross square feet. The FAR can be increased to 18:1 through the purchase of Transferable Development Rights under Planning Code Section 123, which would increase the allowable gross floor area for the site to 260,640 gross square feet. The proposed project, at 105,224 gross square feet (7.26 FAR), would be within the allowable FAR of 9:1 without the purchase of Transferable Development Rights.

San Francisco General Plan/Downtown Area Plan

The City of San Francisco General Plan (General Plan) establishes objectives and policies guiding land use decisions to physical land development. The General Plan contains 10 elements: Commerce and Industry,

Recreation and Open Space, Housing, Community Facilities, Urban Design, Environmental Protection, Transportation, Air Quality, Community Safety, and Arts. In addition, the General Plan includes area plans that outline goals and objectives for specific geographic planning areas, such as the Downtown Area Plan, which includes the project site.

Any conflict between the proposed project and policies that relate to physical environmental issues are discussed in Section E, Evaluation of Environmental Effects. The compatibility of the proposed project with General Plan policies that do not relate to physical environmental issues will be considered by decision-makers as part of their decision whether to approve or disapprove the proposed project.

The Downtown Area Plan aims to "encompass a compact mix of activities, historical values, and distinctive architecture and urban forms that engender a special excitement reflective of a world city." To do so, the Downtown Area Plan establishes a framework of goals and policies that address housing, urban form, safety and livability, streetscape, preservation, and transportation.

The proposed project would not obviously conflict with any goals, objectives, or policies in the General Plan and the Downtown Area Plan. In addition, the compatibility of the proposed project with the General Plan and Downtown Area Plan would not affect the physical environmental effects of the proposed plan.

Regional Plans and Policies

In addition to local plans and policies, several regional planning agencies have environmental, land use, and transportation plans and policies that consider growth and development in the nine-county San Francisco Bay Area. Some of these plans and policies are advisory; some include specific goals and provisions that must be adhered to when evaluating a project under CEQA. The regional plans and policies that are relevant to the proposed project are discussed below.

- The Plan Bay Area and Regional Housing Needs Plan, prepared by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC), is a long-range land use and transportation plan for the nine-county Bay Area that covers the period from 2010 to 2040. Plan Bay Area calls for concentrating maintaining, managing, and improving the region's multimodal transportation network and proposes transportation projects and programs to be implemented from reasonably anticipated revenue. Plan Bay Area was adopted in July 2017.[6]
- The 2035 Regional Transportation Plan prepared by MTC is a policy document that outlines transportation projects for highway, transit, rail, and related uses through 2035 for the nine Bay Area counties.
- The Bay Area Air Quality Management District's (air district) Bay Area 2017 Clean Air Plan requires implementation of "all feasible measures" to reduce ozone and provide a control strategy for reducing ozone, particulate matter, toxic air contaminants, and greenhouse gases. The 2017 Clean Air Plan

[6] Metropolitan Transit Commission (MTC) and Association of Bay Area Governments (ABAG), Plan Bay Area 2040: Regional Transportation Plan and Sustainable Communities Strategy for the San Francisco Bay Area 2017–2040, Final, July 26, 2017, Website: http://files.mtc.ca.gov/library/pub/30060.pdf. Accessed July 25, 2023.

describes the status of local air quality and identifies the emission control measures that are to be implemented.[7]

- The Regional Water Quality Control Board's Water Quality Control Plan for the San Francisco Bay Basin is a master water quality control planning document. It designates beneficial uses and water quality objectives for waters of the State, including surface waters and groundwater, and includes implementation programs to achieve water quality objectives.[8]

Based on the size and nature of the proposed project, no anticipated conflicts with regional plans would occur.

D. SUMMARY OF ENVIRONMENTAL EFFECTS

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

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

This Initial Study examines the proposed project to identify potential effects on the environment. For each item on the Initial Study checklist, the evaluation considered the impacts of the proposed project both individually and cumulatively, with the exception of greenhouse gas emissions, which are evaluated only in the cumulative context. All items on the Initial Study checklist that have been checked "Less than Significant Impact with Mitigation Incorporated," "Less than Significant Impact," "No Impact," or "Not Applicable," indicate that, upon evaluation, the Planning Department has determined that the proposed project could

[7] Bay Area Air Quality Management District (air district). 2017 Clean Air Plan: Spare the Air, Cool the Climate, April 19, 2017, Website: http://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en. Accessed July 25, 2023.

[8] San Francisco Bay Regional Water Quality Control Board (San Francisco Bay RWQCB), Water Quality Control Plan (Basin Plan) for the San Francisco Bay Basin, November 5, 2019. Website: https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/planningtmdls/basinplan/web/docs/ADA_compliant/BP_all_chapters.pdf. Accessed July 25, 2023.

not have a significant adverse environmental effect related to that topic. A discussion is included for those issues checked "Less than Significant Impact with Mitigation Incorporated" and "Less than Significant Impact" and for most items checked "No Impact" or "Not Applicable." For all of the items checked "No Impact" or "Not Applicable" without discussion, the conclusions regarding potential significant adverse environmental effects are based upon field observation, staff experience, and expertise on similar projects, and/or standard reference material available within the Planning Department, such as the California Natural Diversity Database and maps, published by the California Department of Fish and Wildlife.

For the analysis of potential cumulative effects, each environmental topic herein briefly identifies the cumulative context relevant to that topic. For example, for shadow impacts, the cumulative context would be nearby projects that could contribute to cumulative shadow effects on the same open space affected by the proposed project. In other cases, such as air quality, the context would be the San Francisco Bay Area Air Basin.

Aesthetics and Parking

In accordance with CEQA Guidelines Section 21099(d), aesthetics and parking impacts of residential, mixed-use residential, or employment center projects on infill sites located within transit-priority areas would not be considered significant impacts to the environment. Therefore, aesthetics and parking would not be considered for the proposed project if it meets all of the following three criteria:

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

The proposed project meets each of the above three criteria because it is within 0.5 mile of several rail and bus transit routes, is located on an infill site that is already developed with an approximately 55,247-square-foot building that is surrounded by other urban development and would be an employment center project with ground floor retail space. Thus, this Initial Study does not consider aesthetics and parking in determining the significance of project impacts under CEQA.

E. EVALUATION OF ENVIRONMENTAL EFFECTS

E.1 Land Use and Planning

Topics:		Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
E.1	**LAND USE AND PLANNING**					
	Would the project:					
a)	Physically divide an established community?	☐	☐	☐	☒	☐
b)	Cause a significant physical environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐	☐

Impact LU-1: **The proposed project would not physically divide an established community.** ***(No Impact)***

A division of an established community is typically caused by the construction of a physical barrier to neighborhood access, such as a new freeway, or removing a means of access, such as a bridge or a roadway. The proposed project would entail demolition of the existing single-story retail building and the concrete-capped basement and expansion of the existing 9-story commercial and office building into a 15-story (14 stories plus penthouse), approximately 198-foot-tall mixed-use commercial and office building, excluding its mechanical penthouse. Although portions of the sidewalks adjacent to the project site may be closed for periods of time during project construction, the closures would be temporary (limited to months 1 through9 of construction) and alternate pedestrian access would be provided to ensure continued connectivity and access. Following construction, sidewalk access would be restored to its previous condition, with improvements up to current City standards and in compliance with the Americans with Disabilities Act (ADA). Additionally, the project would widen sidewalks on Washington Street from 10 feet to 13 feet, thereby improving sidewalk access in the project vicinity.

The proposed project would not construct a physical barrier to neighborhood access or remove an existing means of access, such as a bridge or roadway; therefore, it would not physically divide an established community. Accordingly, the proposed project would have no impact with respect to physically dividing an established community, and no mitigation measures are necessary.

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

As described in Section C of this document, the proposed project would not conflict with any adopted environmental plan or policy.

As noted in Chapter C, Compatibility with Plans and Existing Zoning, I proposed project would not conflict with General Plan objectives and policies. The proposed project would not substantially conflict with any adopted environmental plan or policy, including the 2017 Clean Air Plan, San Francisco's Strategies to Address Greenhouse Gas Emissions (GHG Reduction Strategy), or the San Francisco Urban Forestry Ordinance. Thus, the proposed project would have a less than significant impact with regard to conflicts with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.

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

The geographic scope for evaluating land use and planning includes cumulative development in the project vicinity. Most of the cumulative development projects are mixed-use projects that include office, hotel, residential, and commercial uses. Such projects would increase the intensity of land use in the project vicinity, similar to the proposed project. Furthermore, the cumulative projects would be infill projects and would be consistent with the planning vision for the area, and would not result in conflicts with adopted land use plans or policies. The cumulative projects would also not combine with the proposed project to alter the land use pattern of the immediate area or create a physical divide in an established community. Therefore, the proposed project, in combination with cumulative projects, would not result in cumulative land use impacts. Accordingly, cumulative impacts related to land use would be less than significant.

E.2 Population and Housing

Topics:		*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*	*Not Applicable*
E.2	**POPULATION AND HOUSING**					
	Would the project:					
a)	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐	☐
b)	Displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing?	☐	☐	☐	☒	☐

Impact PH-1: The proposed project would not induce substantial unplanned population growth, either directly or indirectly. *(Less than Significant Impact)*

The proposed project would develop an additional 49,977 square feet of office space and 6,410 square feet of ground floor retail space. Since there is no housing development proposed for this project, there would be no substantial direct unplanned residential population growth. The proposed project also would not indirectly induce substantial unplanned residential population growth in the project area due to infrastructure improvements because the project site is an infill site located in an urbanized area and does not propose any extensions to area roads or other infrastructure that could enable additional development in currently undeveloped areas.

Employment in San Francisco is forecast to increase by 34 percent (191,000 jobs), for a total of approximately 760,000 jobs between 2010 and 2040.[9] The proposed project would result in an estimated increase of approximately 228 employees (approximately 209 jobs for the office space, approximately 19 jobs for the retail space).[10] New employees on the project site would contribute to overall employment growth in the City. If all of the approximately 228 employees associated with the proposed project were assumed to be new residents to the City, the project-related employment growth would be significantly less than 1 percent (0.09 percent) of San Francisco's estimated job growth between 2010 and 2040. This estimated increase in employment would be negligible in the context of total jobs in San Francisco. Therefore, the proposed project would not directly or indirectly induce substantial unplanned population growth based on ABAG forecasts. The impact from the proposed project would be less than significant, and no mitigation is necessary.

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

The proposed project would be constructed on a site with no existing residents or housing units and would therefore not displace any residents or housing units. Therefore, the proposed project would have no impact related to the displacement of housing units or people and would not necessitate the construction of replacement housing. No mitigation is necessary.

Impact C-PH-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to population and housing. *(Less than Significant Impact)*

The cumulative context for this analysis includes the development projects located in the vicinity of the project site, identified in Section B of this document and mapped on Figure 3. Planned development projects would include residential and mixed-use projects that would include varying combinations of office, hotel, residential, and commercial uses. These projects would result in an intensification of land uses in the project vicinity, similar to the proposed project. However, these projects would also be infill projects, consistent with

9 Association of Bay Area Governments (ABAG) and Metropolitan Transportation Commission (MTC). July 2020. Priority Development Areas (Plan Bay Area 2050) Map. Website: https://opendata.mtc.ca.gov/datasets/priority-development-areas-plan-bay-area-2050/explore?location=37.899147%2C-122.289021%2C8.49. Accessed July 25, 2023.

10 The Planning Department's 2020 Jobs Housing Fit Report projects that office uses should have a 240 square-feet-per-job employment density factor, and retail uses should have a 350 square-feet-per-job employment density factor. Using these density factors the proposed net increase of 50,000 square feet of office uses and 6,410 square feet of retail uses would thus result in approximately 209 office employees and 19 retail employees, totaling approximately 228 employees.

the planning vision for the regional and citywide growth in population, housing, and employment. As described under Impacts PH-1 and PH-2, the proposed project would not induce substantial direct or indirect population growth; displace a substantial number of existing housing units, people, or create demand for additional housing elsewhere. Therefore, the proposed project would not result in a significant cumulative impact related to population and housing, and the impact would be less than significant. No mitigation is necessary.

E.3 Cultural Resources

Topics:	*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*	*Not Applicable*
E.3 CULTURAL RESOURCES					
Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code?	☐	☒	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐	☐

Impact CR-1: **The proposed project could cause a substantial adverse change in the significance of an individually eligible historical resource as defined in CEQA Guidelines Section 15064.5, including those resources listed in Article 10 or Article 11 of the planning code.** ***(Less than Significant Impact with Mitigation Incorporated)***

A historical resource is defined in CEQA Guidelines Section 15064.5(a) as one that is listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR). In addition, a resource that (i) is identified as significant in a local register of historical resources, such as Article 10 and/or Article 11 of the San Francisco Planning Code, or (ii) is deemed significant due to its identification in a historical resources survey meeting the requirements of California Public Resources Code Section 5024.1(g) is presumed to be a historical resource "unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant."

A property may be considered a historical resource if it meets any of the CRHR criteria related to (1) events, (2) persons, (3) architecture, or (4) information potential that make it eligible for listing in the CRHR, or if it is considered a contributor to a potential historic district. The CRHR criteria, which are based on the criteria established by the National Park Service (NPS) for the National Register of Historic Places (NRHP), include the following:

- **Criterion 1 (Event):** Resources that are associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California.
- **Criterion 2 (Person):** Resources that are associated with the lives of persons important to local history.
- **Criterion 3 (Design/Construction):** Resources that embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of an important creative individual, or possess high artistic values.
- **Criterion 4 (Information Potential):** Resources or sites that have yielded or have the potential to yield information important in prehistory or history.

To be considered a historical resource, a property must be historically significant and retain sufficient integrity to convey that significance. Integrity is defined as the ability of a property to convey its significance.[11] There are seven aspects to integrity:

- **Location:** where the historic property was constructed or the place where the historic event occurred;
- **Design:** the combination of elements that create the form, plan, space, structure, and style of property;
- **Setting:** the physical environment of a historic property;
- **Materials:** the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property;
- **Workmanship:** physical evidence of the crafts of a particular culture or people during any given period in history or prehistory;
- **Feeling:** a property's expression of the aesthetic or historic sense of a particular period of time; and
- **Association:** the direct link between an important historic event or person and a historic property.

Additionally, properties that are not listed but are otherwise determined to be historically significant, based on substantial evidence, would also be considered historical resources. According to CEQA Guidelines Section 15064.5(b)(2)(C), the significance of a historical resource is materially impaired when a project "demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance." Physical demolition, destruction, relocation, or alteration of a historical resource or its immediate surroundings is considered a substantial adverse change.

Potential substantial adverse changes to historical resources are generally analyzed in accordance with the Secretary of the Interior's Standards for Rehabilitation (the Standards), which are a series of concepts developed by the United States Department of the Interior to assist in the continued preservation of a property's historical significance through the preservation of character-defining materials and features. They guide appropriate maintenance, repair, and replacement of historic materials, and direct the design of compatible new additions or alterations to historic buildings. The Standards are used by federal, State, and local agencies to review both federal and nonfederal rehabilitation proposals. The Standards provide four approaches to historical preservation: preservation, rehabilitation, restoration, and reconstruction. "Rehabilitation" is defined as "the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical,

[11] National Park Service (NPS). 1997. National Register Bulletin, How to Apply the National Register Criteria for Evaluation. Website: https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf. Accessed June 18, 2023.

cultural, or architectural values."[12] The Standards are listed in Section 4.1 of the 545 Sansome Street Historic Resource Evaluation – Part 2 (HRER Part II).

The proposed project would demolish a building on 501, 503, and 505 (501-505) Washington Street (constructed in 1977). In addition, the proposed project would materially alter various aspects of the building on 545 Sansome Street (constructed in 1930). In evaluating whether the proposed project would cause a substantial adverse change in the significance of a historical resource, the Planning Department must first determine whether the existing buildings on the project site are historical resources. The project-specific Historical Resource Evaluations (HREs) and Historical Resource Evaluation Responses (HRERs) are posted on the City's website through the San Francisco Property Information Map (*https://sfplanninggis.org/pim/*) under the project's record number (2020-001410ENV) and address.

501-505 Washington Street

501-505 Washington Street is occupied by a one-story commercial building containing three storefronts of equal width, measuring approximately 29 feet by 68 feet.[13] The building consists of an unknown structure, with pyramidal roof surmounts over each of the three storefronts.[14] The building was constructed in 1977 by an unknown architect. The 2007 501-505 Washington Street HRE determined that the building is essentially unchanged since its construction.

As of June 2023, the building is 45 years old. In 2007, the 501-505 Washington Street HRE concluded that because the building was 30 years of age at the time of the evaluation, the building was not considered to be a historical resource. However, the 501-505 Washington Street HRE also determined that the existing building did not exhibit exceptional history or architecture and would therefore not be eligible for the CRHR under Criterion 1 (Event), Criterion 2 (Person), and Criterion 3 (Design/Construction). The Historic Resource HRER Part II, prepared for the project site on September 28, 2023, found that no further information for the 501-505 Washington Street building was given between the last evaluation and the HRER Part II to indicate any eligibility for the CRHR. As such, the HRER Part II determined that the demolition of the 501-505 Washington Street building would not be considered a significant adverse impact to historical elements on the project site.

545 Sansome Street

The building at 545 Sansome Street was constructed in 1930 and was designed by Willis Polk & Company. The immediate vicinity of the building is composed of buildings of low, medium, and high rises with the majority constructed in the last quarter of the twentieth century.[15] However, the building is close to two historic districts; Jackson Square National Register District/ Article 10 Landmark District is located across Washington Street to the north, and the NRHP-eligible Chinatown Historic District is approximately 550 feet east.

In March 2009, the Planning Department prepared an HRER Part I for 545 Sansome Street and determined that the building is eligible for listing in the CRHR under Criteria 1 due to its association with San Francisco's

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12 National Park Service (NPS). 2017. The Secretary of The Interior's Standards For The Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings.

13 Kostura, William. 2007. Historical Evaluation of 501-503-505 Washington Street, San Francisco. July.

14 Ibid.

15 Architectural Resources Group. 2022. 545 Sansome Street Historic Resource Evaluation – Part 2. 14 December.

printing and publishing industry, which made a significant contribution to the development of the City and its commerce during a period of significance between the 1850s and 1950s.[16] This conclusion was reaffirmed in the HRER Part II. Specifically, the building is one of approximately 10 to 12 extant buildings in San Francisco that best express various aspects of the City's printing, publishing, and related services history from 1906 through the 1950s, which include Union Lithograph Company, 733-755 Harrison Street (1906); Britton and Rey, 215 Leidesdorff Street (1909 and 1912); and Sunset Press and Abbott-Brady Printing, 1045 Sansome Street (1926). In addition, the building serves as one of the best examples of buildings built to house multiple printing firms in the city. While the building was associated with prominent persons throughout its history, the HRER Part I found that the structure did not contain any intimate associations with these persons, precluding the building's eligibility under Criterion 2 (Persons). The building was also found to not embody the distinctive characteristics of a type, period, or method of construction, nor does it represent the work of a master. While the building holds markers of modest art deco detailing, the board-form concrete exterior remained unfinished and very few architectural details were incorporated. Minor alterations occurred since the 1960s to the exterior, and the interior has been remodeled for office use. As such, the HRER Part I concluded that the building does not embody the distinctive characteristics of a type, period, region, or a method of construction, represent the work of a master, or possess high artistic value. This precludes the building's eligibility under Criterion 3 (Design/Construction). Finally, the HRER Part I found that the project site is unlikely to yield information important to a better understanding of prehistory or history, precluding the building from being eligible under Criterion 4 (Information Potential).

In March 2009, the Transamerica Block HRER concluded that the 545 Sansome Street structure's integrity of location, design, workmanship, and materials from its period of significance were retained. While the building was found to have lost some of its integrity of setting (physical environment inclusive of spatial relationships to buildings), due to other development in the vicinity, such as the Transamerica Pyramid, altering the area's character,[17] the Transamerica Block HRER found that the building still possesses sufficient integrity from the building's period of significance for eligibility as a CRHR.

'The HRER Part II found that no changes had been made to the structure since the conclusions made by the Transamerica Block HRER in 2009. As such, the 545 Sansome Street building maintains its integrity of location, design, materials, workmanship, and feeling from its period of significance. Thus, the building is eligible as a historic resource for the CRHR.

The proposed project would expand the existing building into a 15-story (14 stories plus penthouse), approximately 198-foot-tall building (excluding its mechanical penthouse) and install new core circulation elements, heating, ventilation, and air conditioning (HVAC) systems, perform façade repairs and window replacements, and make additions to the north, west, and roof of the building. The structure's primary historic façades fronting on Sansome Street and Mark Twain Alley would be retained, and portions of the building's non-primary would be removed.

The proposed project would continue the building's existing use as an office and would require minimal changes to the building's exterior, thus being in conformance with Standard 1. The proposed project would also preserve most of the building's primary character-defining features, except for the building's steel windows, the entrance doors, and transom. In addition, the proposed project would preserve aspects of the building's lesser character-defining features and would design the building's interior to reflect the building's

[16] City and County of San Francisco. 2009. Historic Resource Evaluation Response, Case No. 2002.0133E. March 12.

[17] Ibid.

historic industrial functions. As such, the proposed project would retain most of the building's historic character and would be in conformance with Standard 2 and Standard 5. Furthermore, new building features installed as part of the proposed project would be differentiated from historic materials to avoid creating a false sense of historic development. No non-historic features worthy of retention, nor any features through recent site reconnaissance or historic research, were identified on the existing building. Thus, the proposed project would be in conformance with Standard 3 and Standard 4.

The proposed project would also replace the ground floor storefront windows and steel sash windows within the principal façades at floors two through nine, which would be in conformance with Standard 6. New additions from the proposed project to the existing building would be clearly distinguished by retaining the building's primary façades and recessing the roof top addition from the Sansome Street façade, thus maintaining the existing building's height, scale, and massing. Additionally, the rooftop addition viewed at pedestrian-level would not overwhelm or take precedence over the existing resource due to its height, scale, and massing. Moreover, the setback from the principal elevation, the proximity of surrounding buildings, and limited long-distance views of the historic building contribute to the compatibility of the proposed additions. The proposed repairs and replacement of existing features on the building would also comply with Standard 9.

Finally, the proposed six-story addition to the existing building would retain sufficient loadbearing walls to discern between existing and new construction and could be removed to reveal the existing building's previous form and have its features reconstructed. Therefore, the proposed project would retain the building's essential form and would not impair the surrounding urban environment, thus complying with Standard 10.

As part of the proposed project, several painting and repair activities would be conducted on the exterior of the 545 Sansome Street building. These activities could cause damage to historic materials. However, implementation of Mitigation Measure M-CR-1 would require that a qualified architectural conservation professional prepare project-specific specifications for exterior surface repairs and patching of historic concrete as well as cleaning methods and painting specifications, which would be submitted to the City for review and approval. These repair or replacement measures would be compliant with Standard 7. Therefore, with implementation of Mitigation Measure M-CR-1, the proposed project would conform with Standard 7. The full text of Mitigation Measure M-CR-1 is provided in the attached Mitigation Monitoring and Reporting Program (MMRP) (Attachment B).

Standard 8 requires that significant archaeological resources on-site be protected and preserved, and that any disturbed archaeological resources must be mitigated. No known archaeological resources have been identified on the project site. However, the proposed project would implement mitigation measures requiring archaeological testing, consultation, monitoring, and data recovery (Mitigation Measure M-CR-2). A more detailed analysis of the proposed project's impact on archaeological resources and Mitigation Measure M-CR-2 is provided under Impact CR-2.

While the proposed project would alter a structure eligible for the CRHR, it would modify the structure in accordance with the Secretary of Interior's Standards for Rehabilitation through implementation of Mitigation Measure M-CR-1 and Mitigation Measure M-CR-2. Therefore, project-related impacts to a historic resource would be less than significant with mitigation incorporated.

Other Construction-Related Impacts

Construction activities at the project site would generate vibration that could potentially cause structural damage to adjacent and nearby buildings. As described in Section E.6, Noise, drilling and compacting activities could occur close to Washington Street and Sansome Street. The groundborne vibration levels would not exceed the California Department of Transportation (Caltrans) criterion of 0.25 peak particle velocity (PPV) for historic structures. Implementation of Mitigation Measure M-CR-1 would ensure no impacts would occur to the building at 545 Sansome Street. Therefore, the proposed project would not result in a significant impact on a historical resource from construction-related groundborne vibration. No mitigation is required.

Impact CR-2: The proposed project could cause a substantial adverse change in the significance of an archaeological resource. *(Less than Significant Impact with Mitigation Incorporated)*

The proposed project would require the excavation of an area of approximately 10,360 square feet, and 2,900 cubic yards of soil to a maximum depth of disturbance (for building foundation) to between 80 and 165 feet deep. The Planning Department conducted a preliminary archaeological review of the proposed project and determined that the potential for the proposed project to affect archaeological resources.[18] In addition, the Planning Department conducted a preliminary archaeological review of the adjacent 530 Sansome Street in 2020, identifying the potential for the project area to contain archaeological resources.

Although no known CEQA significant archaeological resources have been recorded within the project area,[19] geotechnical analysis and archival research show that there is potential for encountering buried Native American archaeological resources, historical archaeological resources, and buried maritime resources. As discussed above, the proposed project would result in excavation to approximately 14 feet below ground surface(bgs) for the new basement and would have deep soil mixing to improve soil to a depth of 35 feet bgs. These project elements could impact historical resources, maritime resources, and redeposited Native American archaeological resources located in the fill and Young Bay Mud layers. In addition, the proposed project would construct deep building foundations that would extend to between 80 and 165 feet bgs, depending on the type of building foundation used (augured cast-in-place piles or micropiles). The foundation work would extend through fill, Young Bay Mud, Colma, Old Bay Clay, and potentially into bedrock, depending on the type of building foundation used. Deep foundations could impact historical resources, maritime resources, redeposited Native American archaeological resources located in the fill and Young Bay Mud layers as well Native American resources that could be present at the top of the Colma layer.

Although some archaeological resources (particularly nineteenth century resources) may have been damaged by the installation of the existing basement and timber piles, there is the potential for archaeological resources below the existing basement and for deeper resources to have survived the installation of the piles.[20] Ground-disturbing construction activity could therefore result in significant impacts to these potential archaeological resources. To reduce impacts on archaeological resources, the project sponsor would be required to implement Mitigation Measure M-CR-2, Archaeological Testing**.**

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18 Planning Department. Preliminary Archaeology Review: 545 Sansome Street. September 28, 2022.

19 City and County of San Francisco. 2023. San Francisco Property Information Map. Website: https://sfplanninggis.org/pim/?tab=Environmental+Information&search=0207035. Accessed July 25, 2023.

20 Paleontology Center of Excellence and R-2 Paleo Initiative. 1996. Probable Fossil Yield Classification–(PFYC). Website: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5340403.pdf. Accessed July 25, 2023.

Mitigation Measure M-CR-2 requires that the sponsor hire an archaeological consultant from planning's Qualified Archaeological Consultant List to carry out an archaeological testing program. The program includes preparation of an Archaeological Testing Plan, conducting archaeological testing, and preparation of a written report on the testing results. If significant archaeological and/or tribal cultural resources are discovered during testing, the measure has additional provisions for the treatment of those resources including data recovery, analysis, interpretation, and curation. The full text of the mitigation measure can be found in the MMRP.

With implementation of Mitigation Measure M-CR-2, the impact on Native American and/or historical archaeological resources from construction of the proposed project would be less than significant with mitigation incorporated.

Impact CR-3: The proposed project could disturb human remains, including those interred outside of formal cemeteries. ***(Less than Significant Impact with Mitigation Incorporated)***

The project site and its immediate vicinity do not contain any known or suspected human remains, including those interred outside of formal cemeteries. In the unlikely event that human remains are encountered during construction, any inadvertent damage to human remains would be considered a significant impact. Mitigation Measure M-CR-2, Archaeological Testing, includes the required procedures to address, protect, and treat human remains should any be discovered during construction. With implementation of Mitigation Measure M-CR-2, as described in the MMRP, impacts from the proposed project would be less than significant with mitigation incorporated**.**

Impact C-CR-1: The proposed project, in combination with cumulative projects, would result in demolition and/or alteration of a historical resource, as defined in CEQA Guidelines Section 15064.5. ***(Less than Significant Impact)***

Section B, Cumulative Context, of this document identifies development projects located within a 0.25-mile radius of the project site. Historic resources in the project vicinity are located at 530 Sansome Street, 875 Sansome Street, 900 Sansome Street, 425 Broadway, 17 Osgood Place, Portsmouth Square Park (733 Kearny Street), 100 Columbus Avenue, 600 Montgomery Street, 749 Grant Avenue, 400 California Street, and 220 Battery Street.

With respect to the cumulative impacts, these cumulative projects have the potential to result in impacts to historic resources. However, the cumulative projects would adhere to applicable federal, State and local laws and regulations, and mitigation measures, similar to Mitigation Measure M-CR-1. With the exception of 530 Sansome Street, other cumulative projects are geographically dispersed and sufficiently distant from the project site such that any alteration or demolition of existing buildings and new construction in these locations would not act in combination with one another to substantially change the setting of any historical resource. As previously discussed, the project site is also not located within a historic district. For these reasons, the proposed project would not in combination with cumulative projects would not contribute to any cumulative impacts on historical resources. Therefore, the proposed project would have a less than significant cumulative impact on historic resources.

Impact C-CR-2: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts archaeological resources and human remains. ***(Less than Significant Impact)***

Project-related impacts on archaeological resources and human remains are site-specific and generally limited to a project's construction area and adjacent projects. A potentially significant cumulative impact to archaeological resources could occur if two projects could combine in a way that could significantly impact the same known or potential resource. The 530 Sansome Street project, which is located across the street from the project site, has the potential to impact some of the same potential archaeological resources as the proposed project. For this reason, the proposed project, in combination with cumulative projects, has the potential to result in a significant cumulative impact to archaeological resources. The proposed project's contribution to such an impact could be cumulatively considerable. However, with implementation of Mitigation Measure M-CR-2, the proposed project's contribution to this impact would be reduced to a less than significant level. For these reasons, with mitigation incorporated, the proposed project, in combination with other cumulative projects, would not result in a cumulatively considerable impact on archaeological resources or human remains.

E.4 Tribal Cultural Resources

Topics:	*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*	*Not Applicable*
E.4 TRIBAL CULTURAL RESOURCES					
Would the project:					
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☒	☐	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐	☐

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

Pursuant to CEQA Guidelines Section 21074, tribal cultural resources are defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are also either (a) included or determined to be eligible for inclusion in the CRHR or (b) included in a local register of historical resources as defined in CEQA Guidelines Section 5020.1(k).

In accordance with CEQA Guidelines Section 21080.3.1(d) (Assembly Bill [AB] 52), the Planning Department contacted Native American organizations and individuals in the San Francisco area on February 16, 2023, providing a description of the proposed project and requesting comments on the identification, presence, and significance of tribal cultural resources in the project vicinity.[21] During the 30-day comment period, two Native American tribal representatives responded to the notification letter from the Planning Department to request consultation. The Planning Department received a response from the Ohlone Indian Tribe on March 17, 2023, requesting further information on the proposed project, but consultation was not requested. On March 21, 2023, the Planning Department received a response from the Indian Canyon Mutsun Band of Costanoan requesting consultation with the Planning Department.

Based on discussions with Native American tribal representatives in 2015 Native American archaeological resources in San Franciso are presumed to be potential tribal cultural resources. As discussed in the archaeology section above, the project site is sensitive for Native American archaeological resources, which may also represent tribal cultural resources.

Native American tribal consultation undertaken for the Housing Element 2022 Update Environmental Impact Report identified both San Francisco's modern shorelines and the location of historical waterways as potential tribal cultural resources.[22]

Based on modeling of the changing shoreline of the San Francisco Bay over time, the project location is nearby the former shoreline and marshes of the San Francisco Bay and Yerba Buena Cove as it was located approximately 2,000 years ago. In regard to historical water sources, such as the historical San Francisco Bay shoreline, during previous consultation local Native American representatives identified such former waterways and shoreline environments, as potential sources of paleoenvironmental data, which is information about plant species, wetlands and other water resources, wildfires, rainfall, and other environmental factors that are important in understanding how Ohlone life changed in San Francisco over the past 8,000 years and more.

During consultation for this project, the tribal representative from the Indian Canyon Mutsun Band of Costanoan reiterated the importance of understanding the layered history of the past and the cultural significance of understanding changing landscape at the interface of land and water within San Francisco.

A tribal cultural resource is adversely affected when a project impacts its significance. As noted under Impact CR-2, the proposed project has potential for buried Native American archaeological resources below the existing basement level. In addition, as discussed above, the project is located in an area that has potential for tribal cultural resources related to historical San Francisco Bay shorelines and nearby marshes.

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21 San Francisco Planning Department. 2023. Tribal Notification Regarding Tribal Cultural Resources and CEQA, Case No. 2020-001410ENV. February 16.

22 San Francisco Planning Department. 2022. Section 4.3 Tribal Cultural Resources in the Draft Environmental Impact Report Volume I San Francisco Housing Element 2022 Update.

As the proposed project has the potential to impact both archaeological and non-archaeological tribal cultural resources, during consultation for the proposed project, the Indian Canyon Mutsun Band of Costanoan recommended that the project implement Native American cultural sensitivity training prior to construction and if tribal cultural resources are found during archaeological testing, there would be Native American monitoring of subsequent testing and any associated archaeological data recovery. Additionally, if significant resources are encountered during archaeological testing or any project soil disturbing activities a public facing interpretive program that discusses landscape change and the layers of history at the project location would be installed at project site. The public interpretation program would be developed in consultation with local Native American representatives.

Mitigation Measure M-CR-2 also includes requirements that if deposits associated with historical waterways, such as the marshes of the former Yerba Buena Cover, are identified during soil disturbing project activities, irrespective of whether cultural material is present, samples shall be extracted and processed for dating, flotation for paleo-botanical analysis, and other applicable special analyses pertinent to identification of possible cultural soils and for environmental reconstruction. Paleoenvironmental information would be gathered and would be used to inform the public about this layered history of the project site. Therefore, implementation of Mitigation Measure M-CR-2 would ensure that the proposed project would not cause a substantial adverse change in the significance of tribal cultural resources throughout construction of the proposed project. As such, the proposed project's impact would be less than significant with mitigation incorporated.

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

The cumulative context for tribal cultural resources is generally site-specific and limited to the construction area and immediate adjacent project sites. A potentially significant cumulative impact to tribal cultural resources could occur if two or more projects could combine in a way that could significantly impact the same known or potential resource. The 530 Sansome Street project, which is located across the street from the project site, has the potential to impact the same known or potential tribal cultural resources as the proposed project. For this reason, the proposed project, in combination with cumulative projects, has the potential to result in a significant cumulative impact to tribal cultural resources. The proposed project's contribution to such an impact could be cumulatively considerable. However, with implementation of Mitigation Measure M-CR-2, the proposed project's contribution to this impact would be reduced to a less than significant level. For these reasons, with mitigation measures incorporated, the proposed project, in combination with other cumulative projects, would not result in a cumulatively considerable impact on tribal cultural resources.

E.5 Transportation

Topics:		*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*	*Not Applicable*
E.5	**TRANSPORTATION AND CIRCULATION**					
	Would the project:					
a)	Involve construction that would require a substantially extended duration or intensive activity, the effects of which would create potentially hazardous conditions for people walking, bicycling, or driving, or public transit operations; or interfere with emergency access or accessibility for people walking or bicycling; or substantially delay public transit?	☐	☐	☒	☐	☐
b)	Create potentially hazardous conditions for people walking, bicycling, or driving or public transit operations?	☐	☐	☒	☐	☐
c)	Interfere with accessibility of people walking or bicycling to and from the project site, and adjoining areas, or result in inadequate emergency access?	☐	☐	☒	☐	☐
d)	Substantially delay public transit?	☐	☐	☒	☐	☐
e)	Cause substantial additional Vehicle Miles Traveled or substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow travel lanes) or by adding new roadways to the network?	☐	☐	☒	☐	☐
f)	Result in a loading deficit, the secondary effects of which would create potentially hazardous conditions for people walking, bicycling, or driving; or substantially delay public transit?	☐	☐	☒	☐	☐
g)	Result in a substantial vehicular parking deficit, the secondary effects of which would create potentially hazardous conditions for people walking, bicycling, or driving; or interfere with accessibility for people walking or bicycling or inadequate access for emergency vehicles; or substantially delay public transit?	☐	☐	☐	☐	☒

The proposed project would satisfy the eligibility criteria for a "transit-oriented infill project" under CEQA Guidelines Section 21099(d)(1) because it would consist of employment center uses; would be located on an infill site; and would be located within a transit-priority area. Therefore, the proposed project would be exempt from an analysis of impacts on (automobile) parking under CEQA. Furthermore, the proposed project would meet the map-based screening criterion for Vehicle Miles Traveled (VMT) impacts as discussed below, thereby exempting it from analyzing secondary impacts related to parking, including potentially hazardous conditions for people walking, bicycling, or driving; interference with accessibility for people walking or bicycling; inadequate access for emergency vehicles; and substantial delay for public transit.

The Governor's Office of Planning and Research (OPR) Technical Advisory provides screening criteria to identify types, characteristics, or locations of land use projects that would not exceed these VMT thresholds of significance and recommends that if a project or land use proposed as part of the project meets any of the below screening criteria, then VMT impacts are presumed to be less than significant for that land use and a detailed VMT analysis is not required. These screening criteria and how they are applied in San Francisco are described below:

- **Map-Based Screening for Residential and Retail Projects.** The Technical Advisory recommends mapping areas that exhibit where VMT is less than the applicable threshold for that land use. Accordingly, the transportation authority has developed maps depicting existing VMT levels in San Francisco for residential and retail land uses based on the San Francisco Chained Activity Model Process (SF-CHAMP) 2012 base-year model run. The Planning Department uses these maps and associated data to determine whether a proposed project is located in an area of the City that is below the VMT threshold.
- **Proximity to Transit Stations.** The Technical Advisory recommends that residential and retail projects, as well as projects that are a mix of these uses, proposed within 0.5 mile of an existing major transit stop (as defined by CEQA Guidelines § 21064.3) or an existing stop along a high-quality transit corridor (as defined by CEQA Guidelines § 21155) would not result in a substantial increase in VMT. However, this presumption would not apply if the proposed project would: (1) have a FAR of less than 0.75; (2) include more parking for use by residents, customers, or employees of the project than required or allowed, without a conditional use; or (3) is inconsistent with the applicable sustainable communities strategy.

For these reasons, a quantitative transportation analysis is not required for the proposed project.

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

The Planning Department's Transportation Impact Analysis Guidelines, adopted in February 2019, set forth screening criteria for types of construction activities that would typically not result in significant construction-related transportation effects based on project site context and construction duration and magnitude. These include criteria such as expected construction timeframe (required to be 30 months or less) and the level of expected excavation (required to be 2 levels bgs or less). The proposed project would take approximately 28 months to be constructed. During the construction period, the sidewalk and parking/far left lane along the project site on Washington Street would be subject to temporary closure during demolition (months 1 through 9). The sidewalk along Sansome Street would similarly be closed if Fire Station 13 is not in operation. Given the project site context and construction duration and magnitude, the project meets the screening criteria.

Further, the proposed project would be subject to the San Francisco Regulations for Working in San Francisco Streets (the blue book). The blue book is prepared and regularly updated by the SFMTA, under the authority derived from the San Francisco Transportation Code. It serves as a guide for contractors working in San Francisco streets. The blue book establishes rules and guidance so that construction work can be

done safely and with the least possible interference with pedestrian, bicycle, transit, and vehicular traffic. As part of the proposed project's construction process, a 4-foot-wide protected pedestrian access walkway would be constructed outside of the closure on both Washington Street and Sansome Street to allow continuous pedestrian access and minimal interruption with pedestrian, bicycle, transit, and vehicular traffic during the construction process. The proposed project would be required to adhere to blue book regulations and, therefore, would have a less than significant construction-related transportation impact.

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

The proposed project would add approximately 16 private auto trips and five Transportation Network Company (TNC)/taxi trips to local roadways during operation during the p.m. peak-hour compared to existing conditions, and a total of approximately 214 daily vehicle trips .[23,24] The proposed project does not include off-street parking and would not create a new curb cut along the project frontages; therefore, the project would not create a new hazard to pedestrians on the sidewalks along the project's frontages. Because of the low number of new p.m. peak-hour vehicle trips associated with the proposed project, relatively few turning movements would be expected to occur that would conflict with people walking, bicycling, or driving along Washington Street and Sansome Street.

The proposed project would expand the Washington Street sidewalk from approximately 10 feet to 13 feet wide, which would create safer pedestrian conditions along the project's Washington Street frontage, and replace/upgrade the curb ramp at the southwest corner of the Washington Street and Sansome Street intersection The proposed project would not alter the existing street grid, reconfigure the intersections near the project site, or introduce other physical features that would create potentially hazardous conditions for people driving, walking, or bicycling, or for public transit operations. Therefore, the proposed project would not exacerbate existing hazardous conditions in the project vicinity or create a new potentially hazardous condition for people walking, bicycling, or driving, or public transit operations. Therefore, the proposed project would result in a less than significant impact with respect to potentially hazardous conditions for people walking, bicycling, or driving, or for public transit operations, and no mitigation measures would be required.

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

The proposed project would not implement any changes to the roadway network that have the potential to interfere with accessibility of people walking or bicycling to and from the project site, and adjoining areas, or result in inadequate emergency access. Improvements to the sidewalk and bicycle and pedestrian facilities are outlined, below.

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[23] City of San Francisco, 2023. Travel Demand Tool. 545 Sansome Street. Website: https://sftraveldemand.sfcta.org/. Accessed July 25, 2023.

[24] This is a conservative estimate, as the model does not take into account special project circumstances such as an infill project, transit orientation, and no parking.

As shown in Table 3, Table 4, and Table 5, the proposed project would generate 16 private auto trips and 5 TNC/taxi trips to local roadways during operation during the p.m. peak-hour compared to existing conditions. Daily trips would total 214 for all private vehicle modes.

Table 3: Total Trips Generated by Land Use and Time

Land Use	Square footage	Daily Person Trip Rate (per 1,000 square feet)	Daily Person Trips	PM Person Trip Rate (per 1,000 square feet)	PM Person Trips
Office	49,977[a]	16	785	1.4	70
Retail	2,979[a]	200	596	27	80
Total	–	–	1,380	–	150

Notes:
[a] Net new trips accounting for existing uses
Source: San Francisco Travel Demand Tool. Website: *https://sftraveldemand.sfcta.org/*. Accessed July 25, 2023

Table 4: Mode Split Distribution

Land Use	Auto	TNC/Taxi	Transit	Private Shuttle	Walk	Bike
Office	0.184	0.061	0.288	0.006	0.423	0.037
Retail	0.113	0.046	0.254	0	0.549	0.037
Total	0.297	0.107	0.542	0.0006	0.972	0.074

Source: San Francisco Travel Demand Tool. Website: *https://sftraveldemand.sfcta.org/*. Accessed July 25, 2023.

Table 5: Total Trips by Mode

Mode	Total Person Trips	PM Peak-Hour Vehicle Trips	Total Vehicle Trips
Auto	212	29	163
TNC/Taxi	75	9	50
Transit	377	–	–
Private Shuttle	5	–	–
Walk	659	–	–
Bike	51	–	–

Source: San Francisco Travel Demand Tool. *https://sftraveldemand.sfcta.org/*. Accessed July 25, 2023.

Pedestrian Facilities. As previously noted, there are sidewalks along the project frontages and on surrounding blocks in the project vicinity. The proposed project would expand the sidewalk on Washington Street from approximately 10 feet to 13 feet wide, and would also provide streetscape improvements, such as upgraded curb ramps at the intersection of Washington and Sansome Streets and new street trees, thereby improving pedestrian accessibility in the project vicinity. Because of the expanded sidewalk width, the replacement loading zone would be subject to review and approval by SFMTA. The existing sidewalks in the project vicinity would be able to accommodate the additional pedestrian trips generated by the proposed project without becoming substantially overcrowded or substantially affecting pedestrian flows. The proposed project would not construct any physical obstructions that would obstruct sightlines between people walking and people driving adjacent to the proposed project.

Bicycle Facilities. As previously discussed, the proposed project would generate two p.m. peak-hour bicycle trips. This relatively low number of bicycle trips would not substantially conflict with or result in unsafe conditions to nearby bicycle paths or facilities. Furthermore, the proposed project would not involve any changes to the roadway network, and therefore would not directly affect bicycle circulation.

The proposed project would also add 22 class 1 Bicycle Parking Spaces and six class 2 Bicycle Parking Spaces, facilitating accessibility to and from the project site for people. Within 200 feet of the project site, class 3 bikeways can be found on Washington Street, Sansome Street, and Clay Street. Multiple bikeways of classes 1, 2, and 3 are found within 0.5-mile of the project site. The proposed project would provide adequate bicycle access and would not construct any physical obstructions or create hazardous conditions, such as through obstructing sightlines, to existing bicycle facilities nearby.

Emergency Access. The proposed project would not include features that would inhibit emergency vehicle access to the project site. In addition, pedestrian features such as the widening of the sidewalk and the improvement of the curb ramp on the intersection of Washington Street and Sansome Street would not affect emergency access to the project site, and in the project vicinity. Fire Station 13 is located at 530 Sansome Street on the opposite side of Sansome Street from 545 Sansome Street and is temporarily closed for construction. If Fire Station 13 is reopened and in operation during construction of the proposed project, the proposed project would restrict the usage of protection barricades during construction to existing sidewalks only to allow for sufficient emergency vehicle access on adjacent streets into and out of Fire Station 13. As such, general emergency vehicle access and access to and from Fire Station 13 would be unhindered during the construction and operation of the proposed project.

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

The proposed project would not alter existing transit stops or other facilities for public transit that would affect transit service and would not add a new driveway onto a street with an active public transit route. The proposed project would generate 16 private auto trips and 5 TNC/taxi trips to local roadways during operation during the p.m. peak-hour compared to existing conditions. This level of p.m. peak-hour vehicle trips is below the Planning Department's transit delay screening criterion of 300 p.m. peak-hour vehicle trips, which is the amount of traffic that could potentially substantially delay public transit vehicles operating on routes adjacent to a project site.

Therefore, operation of the proposed project would not result in substantial delays in public transit service and would have a less than significant impact on transit. No mitigation measures would be necessary.

During operation, the proposed project would generate approximately one daily truck trip. This truck trip would be accommodated by the existing 36-foot on-street loading area on Washington Street. Passenger loading is anticipated to be accommodated in nearby loading zones. Therefore, the proposed project's anticipated loading demand would be adequately accommodated and there would be no secondary loading impacts resulting from insufficient loading.

Impact TR-5: The proposed project would not cause substantial additional Vehicle Miles Traveled or substantially induce additional automobile travel by increasing physical roadway capacity in congested areas or by adding new roadways to the network. (*Less than Significant Impact)*

The project site is in an area where the VMT for the proposed project land uses is more than 15 percent below existing regional average daily VMT.

Additionally, the proposed project is not a transportation project and does not include transportation features that would induce automobile travel. Based on the discussion above, the proposed project would result in a less than significant impact with respect to VMT and no mitigation measures would be required.

Impact TR-6: The proposed project would not result in a loading deficit such that impacts would result. *(Less than Significant Impact)*

For existing structures, loading need only be provided for a major addition, not for the entire structure (Planning Code Section 150(c)(1)). For office use in the C-3 districts, the number of required off-street loading spaces depends on the combined gross square footage of these uses, such that 0.1 space is required for every 10,000 square feet of office occupied floor area, rounded to the nearest whole number. No loading is required for less than 10,000 square feet of retail use (Planning Code Section 152.1). The addition of 49,977 square feet of new office space would require 0 loading spaces, such that no off-street loading is required for the proposed project.

There is an existing two-space, on-street yellow curb commercial loading zone on Washington Street, approximately 36 feet in length. The loading zone on Washington Street would remain at 36 feet long to accommodate the loading needs of the proposed project. Calculations of loading space show that only one off-street loading space would be required to accommodate the estimated passenger and freight loading demand of the proposed project.[25] As noted above, the existing on-street loading zone would accommodate the project's anticipated loading demand. Therefore, the proposed project's impacts related to freight, delivery service, and passenger loading would be less than significant.

Impact C-TR-1: The proposed project, in combination with cumulative projects in the vicinity of the project site, would not result in a considerable contribution to construction-related cumulative transportation and circulation impacts. *(Less than Significant Impact)*

The cumulative context for this analysis includes development projects within a 0.25-mile radius of the project site, as listed in Section B, Cumulative Context, of this document. Localized construction-related transportation impacts could occur when cumulative projects generate increased traffic at the same time

[25] San Francisco Planning Code Section 152.1 provides the loading standard for C-3 zoning districts. Office use (Non-Retail Sales and Service) is subject to a loading requirement of 0.1 space per 10,000 sq. ft. of Occupied Floor Area. Using these calculations yields a requirement of less than one freight loading space.

and on the same streets as the proposed project. The nearest cumulative project is 530 Sansome Street, which is located within a block radius of the project site. Construction of the 530 Sansome Street project would require staging of construction materials and equipment on sidewalks adjacent to 530 Sansome Street, including a portion of the on-street angled parking area on the south side of Washington Street, as well as closure of travel lanes on both Washington Street and Sansome Street.

If the construction of the 530 Sansome Street project coincides with the construction of the proposed project, the combination of the two projects would temporarily increase construction-related vehicle traffic in the vicinity of the project site, including higher volumes of trucks traveling to and from the project site during site preparation and grading/excavation phases. Other nearby cumulative projects that could result in increased construction-related vehicle traffic nearby include 530 Sansome Street, 900 Sansome Street, 875 Sansome Street, 733 Kearny Street, and 447 Battery Street.

However, cumulative projects and the proposed project would be required to comply with blue book requirements and/or obtain a special traffic permit from SFMTA prior to the commencement of any construction work. As conditions for the special traffic permit, the sponsor for the proposed project would be required to work with various City departments to develop measures to minimize potential construction impacts related to construction vehicle routing, traffic control, transit vehicle operations, and accessibility and safety for people walking and biking adjacent to the construction area.

Through the special traffic permit review process, SFMTA would ensure that project construction, in combination with construction activities associated with the cumulative projects, would not create potentially hazardous conditions for people walking, bicycling, or driving, would not substantially interfere with emergency access and accessibility for people walking or bicycling, and would not substantially delay public transit. Therefore, the proposed project, in combination with the cumulative projects, would result in less than significant transportation-related construction impacts under cumulative conditions.

Impact C-TR-2: The proposed project, in combination with cumulative projects in the vicinity of the project site, would not result in a considerable contribution to operation-related cumulative transportation and circulation impacts. ***(Less than Significant Impact)***

Hazardous Conditions for People Walking, Bicycling, or Driving, or Public Transit Operations. As discussed in Impact TR-2, the proposed project would not create potentially hazardous conditions for people walking or bicycling or otherwise interfere with bicycle or pedestrian accessibility to or from the site or adjoining areas. Similarly, none of the cumulative projects listed in Section B, Cumulative Context, would create potentially hazardous conditions for people walking or bicycling or otherwise interfere with bicycle or pedestrian accessibility to or from the site or adjoining areas. Within 0.25 mile of the project site, two segments of road have Vision Zero Designation: the Columbus Avenue segment extending from the Columbus Avenue and Montgomery Street intersection to beyond the Columbus Avenue and Taylor Street intersection, and the Broadway segment extending from the Broadway and Battery Street intersection to the Broadway and Larkin Street intersection. However, cumulative projects in the vicinity of these streets, including the projects 733 Kearny Street, 900 Sansome Street, 875 Sansome Street, 425 Broadway, and 17 Osgood Place, would add not add a significant number of vehicles to the Vision Zero roadway segments. For example, 875 Sansome Street, which had the highest addition of vehicles to Broadway, would add 11 p.m. peak-hour trips. This level of traffic increase would not be substantial and would not result in potentially hazardous conditions along Broadway and Columbus Avenue.

The proposed project would not conflict with any planned or proposed improvements to bikeway facilities or affect pedestrian conditions. In addition, the proposed project would increase sidewalk widths along the project's frontage on Washington Street from approximately 10 feet to 13 feet, thereby improving pedestrian conditions in the project vicinity. The existing 36-foot on-street loading zone on Washington Stret would be maintained. Although the proximity of the 530 Sansome Street project to the proposed project could result in an increase in vehicle traffic in the immediate vicinity of the project site, the increased vehicle activity would not be large enough to create potentially hazardous conditions for people walking or bicycling. Both the 530 Sansome Street project and the proposed project would not propose a substantial amount of accessory automobile parking (the proposed project would not produce any parking, while the 530 Sansome Street project would include between 48 and 82 on-site parking spaces). Therefore, the proposed project, in combination with cumulative projects, would not result in a cumulative transportation impact on bicycle and pedestrian conditions. Accordingly, cumulative impacts related to this topic would be less than significant, and no mitigation measures are required.

Accessibility. As discussed above, the proposed project would provide pedestrian accessibility improvements via an expanded sidewalk on Washington Street, and improvements to the southwest curb ramp of the Washington Street and Sansome Street intersection. Similarly, the 447 Battery Street and 530 Sansome Street projects would provide widened sidewalks and pedestrian accessibility improvements. Sidewalks on Sansome Street and Washington Street would host the majority of pedestrian traffic accessing the proposed project; these sidewalks provide direct routes for a limited number of routes for people walking to and from the 530 Sansome Street project, and to a lesser extent, the 447 Battery Street project. Therefore, the 530 Sansome Street and 545 Sansome Street projects would not generate a substantial amount of people walking on the sidewalks fronting the project site and the cumulative projects would not result in significant cumulative impacts related to pedestrian accessibility.

The proposed project and cumulative projects would not create design features that would result in inadequate emergency access. As discussed above, Fire Station 13, located at 530 Sansome Street, could be in operation during construction of the proposed project. As detailed above, construction barriers and closures would be coordinated with the SFMTA to ensure that emergency access is unimpeded. Similarly, cumulative projects would not interfere with emergency access.

Based on the above discussion, the proposed project, in combination with cumulative projects would not interfere with accessibility related to pedestrian, bicycle, or emergency access; therefore, cumulative impacts would be less than significant.

Public Transit Delay. As discussed above, the proposed project would produce 16 p.m. peak-hour vehicle trips. These trips would combine with p.m. peak-hour vehicle trips from cumulative development projects, including approximately 86 p.m. peak-hour trips from 530 Sansome Street and 48 p.m. peak-hour trips from 447 Battery Street. This minor number of trips would be distributed onto local roadways and would not combine to result in substantial vehicle volumes that could significantly delay public transit in the project vicinity. Therefore, the proposed project would not result in a significant cumulative transit delay impact.

Vehicle Miles Traveled. VMT by its nature is largely a cumulative impact. The number and distance of vehicular trips associated with cumulative projects might contribute to the secondary physical environmental impacts associated with VMT. It is likely that no single project by itself would be sufficient in size to prevent the region or state meeting its VMT reduction goals. Instead, a project's individual VMT contributes to cumulative VMT impacts. As stated above, the proposed project is not a transportation

project and does not include transportation features that would induce automobile travel. Thus, the proposed project would not combine with cumulative projects to cause substantial VMT impacts. Therefore, this impact would be less than significant, and no mitigation measures are required.

Loading. As stated under Impact TR-6, the proposed project would not alter the existing, two-space, 36-foot on-street loading space on Washington Street. Calculations show that the proposed project would only require one loading space. Cumulative projects in the immediate vicinity would be served by existing loading zones and would not combine with the proposed project to result in unmet loading demand. Since the proposed project is not modifying the existing loading conditions, the proposed project would not combine with cumulative projects to cause substantial loading impacts. Therefore, the cumulative loading impact, in combination with cumulative projects, would be less than significant.

E.6 Noise

Topics:	*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*	*Not Applicable*
E.6 NOISE					
Would the project:					
a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐	☐
b) Generate excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	☐	☐	☐	☐	☒

The project site is not within an airport land use plan area, nor is it in the vicinity of a private airstrip. Therefore, topic 7(c) is not applicable and is not discussed further.

Impact NO-1: **Construction of the proposed project would not generate substantial temporary or periodic increases in ambient noise levels in the project vicinity.** ***(Less than Significant Impact)***

Existing Noise in the Project Vicinity

Ambient noise levels in the project vicinity were documented in the Final Mitigated Negative Declaration prepared for the 530 Sansome Street project, dated April 28, 2021, and amended on July 29, 2021.[26] No substantial development in the project vicinity has occurred since that time. In addition, it is reasonably assumed that traffic noise levels would have only increased since that time, so utilizing the noise measurement results of this previous analysis provides a conservative baseline against which to compare project impacts.

Two long-term (24-hour) and two short-term (15 minutes) ambient noise measurements were taken near the project site in order to establish the existing ambient noise levels in the project area. Two long-term (24-hour) ambient noise measurements were collected between Tuesday August 27 and Wednesday August 28, 2019, adjacent to residential apartments on the northeast corner of Battery and Washington streets and adjacent to the Club Quarters Hotel on the corner of Merchant and Battery streets.[27] These measurements were conducted prior to shelter-in-place orders resulting from COVID-19 and are therefore representative of more typical traffic levels within the Financial District.[28] One short-term noise measurement was taken on Wednesday, December 2, 2020 to establish existing daytime noise levels at more distant residential receptors near the intersection of Hotaling Place and Washington Street.

Table 6 summarizes the results of the noise measurement survey.

Table 6: Summary of Long-Term and Short-Term Noise Monitoring in the Project Vicinity

Measurement Location		Date and Time Period	dBA			Noise Sources
LONG-TERM MEASUREMENTS (24 HOURS)						
LT-1	Near 550 Battery Street, in front of the Gateway Apartments	August 27, 2019	73 L_{eq}	65 L90[1]	75 L_{dn}	Vehicle and bus traffic
LT-2	Southeast of project site at corner of Merchant and Battery Streets, adjacent to existing hotel building	August 27, 2019	69 L_{eq}	63 L90[1]	76 L_{dn}	Vehicle and bus traffic
SHORT-TERM MEASUREMENT (15 MINUTES)						

26 San Francisco Planning Department. 2021. Final Mitigated Negative Declaration. Website: https://citypln-m-extnl.sfgov.org/SharedLinks.aspx?accesskey=5330bc144f360e2e2ef45d2e8fafb9e2c8632804a545d3326b855bb3fb36dabd&VaultGUID=A4A7DACD-B0DC-4322-BD29-F6F07103C6E0. Accessed August 22, 2023.

27 City and County of San Francisco. 2020. Draft Environmental Impact Report, 447 Battery Street Project, Case 2014, 1036E, Appendix B, Initial Study. Website: https://files.ceqanet.opr.ca.gov/254416-3/attachment/nMvkpSC06hf7AIwwli5oWMJAb1NZglMFPPFQIuJg79xj6rUoyqSNzWf0TEKf-qNuFnd1G_MY2Rl43mgv0. Accessed August 22, 2023.

28 Environmental Science Associates. 2021. Noise Technical Memorandum – 530 Sansome Street Project. Website: https://citypln-m-extnl.sfgov.org/SharedLinks.aspx?accesskey=826c8d24c18bc142e3a5a65992aedb27c9e5b40592dc4b1618c7b80c528a42cb&VaultGUID=A4A7DACD-B0DC-4322-BD29-F6F07103C6E0. Accessed August 22, 2023.

Measurement Location		Date and Time Period	dBA	Noise Sources
ST-1	Northeast corner of Washington Street and Hotaling Place	December 2, 2020	65 Leq[2]	Vehicle traffic

Notes:
NA = Data point not applicable to short-term measurements
LT = Long-Term
ST = Short-Term
[1] This L90 metric is a 24-hour average. The nighttime average (10:00 p.m. to 7:00 a.m.) is 62 dBA.
[2] The Leq metric for the short-term measurement is the average noise level over the 15-minute measurement.
Sources: ICF, 2019; ESA, 2021.

Existing noise levels in the project area are characteristic of an urban/city environment, with documented ambient day-night sound levels (L_{dn}) of 75 dBA or greater.

Existing Sensitive Receptors

Some land uses are more sensitive to noise levels than others due to the types of activities typically associated with the uses. Residences, hotels, schools, senior care facilities, and hospitals are generally more sensitive to noise than commercial and industrial land uses. There are no existing hospitals or skilled nursing facilities within 900 feet of the project site. The closest sensitive receptor is 530 Sansome Street, located approximately 60 feet east of the project site. Although the receptor at 530 Sansome Street is currently a fire station, it is considered a sensitive receptor as fire fighters sleep on-site.

Daytime Construction Noise Evaluation

Table 7 shows the hourly noise levels (L_{max}) produced by various types of construction equipment at a reference distance of 50 feet between the equipment and noise receptor as well as the 100-foot distance dictated by the City's noise ordinance. Section 2907 of the City's noise ordinance prohibits operation of any powered construction equipment (non-impact), regardless of age or date of acquisition if such operation emits noise at a level in excess of 80 dBA when measured at a distance of 100 feet from such equipment. As shown in Table 7, construction equipment used for the proposed project would operate within the constraints of the noise ordinance standards.

Table 7: Maximum Noise Levels from Construction Equipment

Construction Equipment	Noise Level at 50 Feet (dB, L_{max})	Noise Level at 100 Feet (dB, L_{max})
Air Compressors	78	72
Backhoes	78	72
Bore/Drill Rigs	84	78
Vibratory Compactor	83	77
Cranes	81	75

Construction Equipment	Noise Level at 50 Feet (dB, L_{max})	Noise Level at 100 Feet (dB, L_{max})
Concrete Truck	79	73
Concrete Pump	81	75
Excavator	81	75
Forklifts	83	78
Pavers	77	71
Paving Equipment	77	71
Roller	80	74
Skid Steer Loaders	79	73
Sweepers	82	76
Sources: Federal Highway Administration. 2006. Roadway Construction Noise Model User's Guide		

The Federal Transit Administration (FTA) has developed general quantitative assessment criteria for analyzing construction noise, which is based on the simultaneous operation of the two noisiest pieces of equipment. The general assessment criteria set construction noise limits, as summarized in Table 8. To evaluate a reasonable worst-case scenario, the analysis assumes that the two loudest pieces of equipment would operate simultaneously at the same location.

Table 8: Maximum Allowed Noise Levels from Construction Equipment

	One-Hour L_{eq} (dBA)	
Land Use	Day	Night
Residential	90	80
Commercial	100	100
Industrial	100	100
Notes: dBA = A-weighted decibel L_{eq} = equivalent sound level Source: Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. Website: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed August 22, 2023.		

The daytime construction noise analysis quantitatively evaluates noise from the two loudest pieces of equipment at sensitive receptor locations to determine whether construction noise would exceed 90 dBA at a residential receptor during daytime hours or would be 10 dBA above the ambient noise level. If so, the evaluation then qualitatively considers the frequency, duration, and intensity of noise levels in determining whether the proposed project would result in a significant noise impact.

Reasonable worst-case construction L_{eq} noise levels would range up to 80 dBA at the nearest daytime (residential) receptor at a distance of 65 feet. The reasonable worst-case noise levels assume that the two loudest pieces of equipment from a construction phase would be operating simultaneously near the project boundaries. The calculated reasonable worst-case construction noise levels would be below the FTA general assessment criterion of 90 dBA for sensitive residential receptors.

For the evaluation of noise impacts with respect to the 10 dBA increase above ambient noise levels, construction noise is added to the daytime ambient L_{eq} noise level. The documented daytime existing noise levels at the nearest sensitive receptor (530 Sansome Street) is 73 dBA L_{eq}. The calculated reasonable worst-case construction noise levels at this nearest sensitive receptor (where potential for noise impacts would be highest) is 80 dBA L_{eq}. This is less than a 10 dBA increase above existing daytime ambient noise levels.

Therefore, calculated reasonable worst-case daytime construction noise levels would not result in an increase of greater than 10 dBA over existing levels at the nearest sensitive receptor or exceed the 90 dBA criterion for daytime construction noise at a residential receptor. Therefore, this impact would be less than significant.

Construction Truck Hauling Noise Impacts

Construction of the proposed project would require the use of on-road vehicles to deliver and haul materials to and from the site. Based on the air quality modeling prepared for this project, the demolition phase would generate the highest number of heavy-duty haul truck trips. The daily haul truck trips during demolition are anticipated to be four truck trips per day, with an average of 50 worker trips per day. These 54 trips would not double existing traffic volumes on any adjacent roadway in the project vicinity and would therefore not result in a perceptible increase in noise. Therefore, there would be no substantial increase in noise from construction traffic and this impact would be less than significant.

Nighttime Construction Noise Impacts

Section 2908 of the San Francisco Police Code prohibits any person between the hours of 8:00 p.m. of any day and 7:00 a.m. of the following day from erecting, constructing, demolishing, excavating for, altering, or repairing any building or structure if the noise level created is in excess of the ambient noise level by 5 dBA at the nearest property line, unless a special permit has been applied for and granted.

Although most of the construction equipment would operate only during daytime hours, the proposed project would require construction activities that would extend beyond normal hours (i.e., between 8:00 p.m. and 7:00 a.m.), such as a 20-hour concrete pour, crane and hoist erection and adjustment activities, utility work, site maintenance activities and material delivery and handling.

The analysis of nighttime construction noise considers the closest sensitive receptor at 530 Sansome Street, located approximately 60 feet east of the project site. The receptor distance for nighttime concrete pours assumes concrete mixer trucks and concrete pumps would be on Washington Street, approximately 100 feet from 530 Sansome Street. Concrete pour staging would not occur on Sansome Street, to avoid potentially blocking any access from the fire station at 530 Sansome Street.

Nighttime noise impacts are assessed based on FTA's 80 dBA exterior noise criterion and for the potential to result in sleep disturbance at nearby noise-sensitive uses. For the nearest receptor to the project site at 530 Sansome Street, a standard assumption of exterior-to-interior noise reduction of 25 dBA with windows

closed is applied.[29] Table 9 provides a summary of the calculated reasonable wort-case maximum noise level from nighttime construction equipment as measured at the nearest sensitive receptor.

Table 9: Calculated Maximum Noise Levels from Construction Equipment

Receptor	Existing Nighttime Noise Level (dBA, L_{eq})	Noise Source	Reference Noise Level (dBA)	Distance to Receptor (Feet)	Adjusted L_{eq} Level (dBA)	Exceed 80 dBA Exterior Nighttime Standard?	Existing Plus Construction Noise Exterior Noise Level (dBA)	Existing Plus Construction Noise Interior Noise Level (dBA)	Exceed 45 dBA Interior Nighttime Standard?
530 Sansome Street	62[a]	Concrete truck/ Concrete pump	85/70	100/120	75	No	75	50	Yes

Notes:
a. Distance for nighttime concrete pours assumes concrete mixer trucks and concrete pumps would be on Washington Street.
b. The existing nighttime value is the average of the monitored L90 metric between the hours of 10:00 p.m. and 7:00 a.m.

As shown in Table 9, noise levels from nighttime concrete pours would be up to 76 dBA at the façade of the closest receptor (530 Sansome Street). Therefore, nighttime construction of the proposed project would not exceed the 80 dBA exterior noise criterion. However, related noise levels could exceed the 45 dBA interior noise criterion and would also result in nighttime noise levels exceeding the existing ambient noise levels by 5 dBA or more at the sensitive receptor location at 530 Sansome Street. The nighttime work would therefore require a special permit from the Director of Public Works or the Director of the Building Department for noise that would exceed the interior nighttime noise standard of 45 dBA L_{eq} and the ambient noise level by 5 dBA at the nearest property plane. The project sponsor would be required to comply with the City's special permit requirements to engage in nighttime work; therefore, nighttime noise would be subject to the limits of the permit that could be granted. Nighttime construction noise resulting from the proposed project would therefore be less than significant.

Impact NO-2: Operation of the proposed project would not generate substantial temporary or periodic increases in ambient noise levels in the project vicinity. (*Less than Significant Impact)*

Section 2909 of the San Francisco Police Code, enforced by the health department during the day and the police department during the night, limits stationary source noise and generally prohibits noise levels from any machine, device, or music or entertainment venue (or any combination) as follows:

a. For residential properties, no more than 5 dBA above the local ambient noise level, as measured at any point outside the property plane;

b. For commercial and industrial properties, no more than 8 dBA above the local ambient noise level, as measured at any point outside the property plane;

[29] United States Environmental Protection Agency (EPA). 1974. Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety. Website: https://nepis.epa.gov/Exe/ZyPDF.cgi/2000L3LN.PDF?Dockey=2000L3LN.PDF. Accessed August 22, 2023.

c. For public property, no more than 10 dBA above the local ambient noise level at a distance of 25 feet or more from the noise source (unless the noise source is being operated to serve or maintain the property or as otherwise provided in the noise ordinance); and

d. In order to prevent sleep disturbance, protect public health and prevent the acoustical environment from progressive deterioration due to the increasing use and influence of mechanical equipment, no fixed noise source may cause the noise level measured inside any sleeping or living room in any dwelling unit located on residential property to exceed 45 dBA between the hours of 10:00 p.m. and 7:00 a.m. or 55 dBA between the hours of 7:00 a.m. and 10:00 p.m. with windows open except where building ventilation is achieved through mechanical systems that allow windows to remain closed.

The criteria provided in Section 2909(a) through (c) are limits for the specified locations (e.g., the property plane, or for public properties, 25 feet from the noise source) and do not refer to a receptor. Section 2909(d) establishes maximum noise levels for fixed sources (e.g., mechanical equipment) at sensitive receptors (i.e., 55 dBA from 7:00 a.m. to 10:00 p.m. and 45 dBA from 10:00 p.m. to 7:00 a.m.) inside any sleeping or living room in any dwelling unit on residential property to prevent sleep disturbance with windows open, except where building ventilation is achieved through mechanical systems that allow windows to remain closed.

Stationary Source Noise

As noted above, operation of stationary mechanical equipment of the proposed project would be subject to Section 2909(b) of the San Francisco Police Code, which limits noise produced at commercial and industrial properties to no more than 8 dBA above the local ambient condition at any point outside the property plane. In addition, stationary mechanical noise would be limited by Section 2909(d), which provides that noise from stationary mechanical equipment at residential interiors cannot exceed 55 dBA during daytime hours (7:00 a.m. to 10:00 p.m.) and 45 dBA during nighttime hours (10:00 p.m. to 7:00 a.m.).

Stationary mechanical equipment at the project site, including building equipment, would contribute to the ambient noise environment. The proposed project would introduce new stationary noise sources, including HVAC equipment, exhaust fans, a chiller, cooling towers, and an emergency generator.

Common noise sources in San Francisco that typically do not result in a substantial temporary increase in ambient noise levels include emergency backup generator testing, provided a project proposes no more than two emergency backup generators. For the proposed project, a single backup generator with an assumed 402 horsepower power output would be installed for backup emergency power. However, the generator would be located in the basement of the building with the exhaust located on the west side of the building. This generator would only operate for approximately 1 hour per week for testing purposes. Therefore, due to the infrequent nature of the noise source, the shielding provided by the basement enclosure and the directional exhaust, the proposed generator would not result in a substantial increase in ambient noise levels and this stationary noise source is not considered further.

Although the exact noise levels from stationary equipment cannot be quantified at this time, some of the louder equipment, such as HVAC equipment and exhaust fans, can produce sound levels in the range of 70 to 75 dBA at 50 feet, depending on the size of the unit.[30]

[30] Hoover and Keith. 1981. Noise Control for Buildings and Manufacturing Plants.

As shown in Table 6, the ambient (24-hour L90) noise level measured at LT-2 on Merchant Street closest to the nearest sensitive receptor was 63 dBA. Therefore, the applicable standard under Section 2909(b) would be 71 dBA (63 dBA + 8 dBA) outside the property plane at ground level.

The proposed project's HVAC equipment would be located in a mechanical penthouse at the top of the building, which would attenuate noise levels due to vertical separation. At minimum, the vertical attenuation (approximately 200 feet) between the project's rooftop mechanical penthouse and the ground floor at the nearest receptor at 530 Sansome Street, and the setback of the penthouse mechanical enclosure, and the shielding provided by the penthouse enclosure would reduce mechanical operation noise by a minimum of 22 dBA as measured at the ground floor of 530 Sansome Street. Therefore, operation of proposed stationary mechanical equipment would result in a reasonable worst-case ground level noise of 53 dBA. This would be below the applicable 2909(b) standard of 71 dBA.

Stationary mechanical equipment, which would result in a noise level of 53 dBA at the ground level would result in interior noise levels at the closest nighttime receptor (530 Sansome Street) of 28 dBA, assuming 25 dBA of exterior-to-interior attenuation from the building shell. This interior noise level would be below the nighttime noise standard of 45 dBA. Therefore, stationary mechanical equipment noise from the proposed hotel would not exceed Section 2909(b) or 2909(d) standards.

Consequently, the stationary mechanical equipment associated with the proposed project would not result in a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in sections 2909(b), 2909(c), and 2909(d). This impact would be less than significant, and no mitigation measures would be required.

Traffic Noise

Traffic noise from vehicle trips generated by the proposed project would increase ambient noise in the project area. However, a project is unlikely to significantly increase ambient noise levels from traffic unless the project would cause a doubling of existing traffic levels, which is generally assumed to result in a 3 dBA increase in the existing ambient noise environment. Therefore, any increase in traffic that would be less than a doubling in volume would not be noticeable to existing sensitive receptors in the project vicinity.

The proposed project would generate add approximately 38 p.m. peak-hour vehicle trips on the local roadway network. Peak-hour traffic volume counts compiled by SFMTA indicate that existing peak-hour volumes on Sansome and Washington streets are 323 and 425, respectively. Conservatively adding all of the proposed project's peak-hour traffic to Sansome Street would increase traffic volumes by 39 percent, while adding all proposed project traffic to Washington Street would increase traffic volumes by 33 percent. These increases are below the doubling of traffic volumes needed to produce a barely noticeable change in traffic noise (i.e., a doubling of traffic volumes). Therefore, traffic noise associated with the proposed project would not exceed the identified criteria and the impact would be less than significant.

Impact NO-3: Construction of the proposed project would not generate excessive groundborne vibration or groundborne noise levels. *(Less than Significant Impact)*

The proposed project could result in vibration impacts resulting from construction activities. Construction-related vibrations can potentially impact modern or historic structures or, if occurring during nighttime hours, can result in sleep disturbance. While construction vibration can also impact vibration-sensitive equipment, there are no hospitals near the project site that may contain vibration-sensitive equipment,

such as magnetic resonance imaging equipment or high-resolution lithographic, optical, or electron microscopes. As such, the proposed project would not cause vibration that would affect vibration-sensitive equipment and such potential impacts are not considered in the following analysis.

Once construction is complete, the proposed project would not involve the use of heavy machinery that is often associated with large commercial or industrial uses. Therefore, no sources of operational vibration are anticipated as part of the proposed project and this topic is not discussed further.

Construction Vibration

The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to structural damage at the highest levels. Construction activities would include demolition and excavation, which would have the potential to generate low levels of groundborne vibration. As such, the existing structure at 545 Sansome Street and other existing structures located within 100 feet of the project site could be exposed to the generation of excessive groundborne vibration or groundborne noise levels related to construction activities.

Groundborne vibration levels resulting from construction activities at the project site were estimated using data published by the FTA.[31] Potential vibration levels resulting from construction of the proposed project are identified based on their distance from construction activities.

The proposed project would not involve types of construction activities that could generate excessive groundborne vibration, such as from impact pile driving. However, equipment used for grading and excavation activities, such as a caisson drill, and loaded trucks, could generate varying degrees of groundborne vibration, as shown in Table 10. The PPV levels for the types of construction equipment that would operate during the construction of the proposed project, and vibration levels at the closest structures are identified in Table 10. Drilling and compaction activities at the project site could occur as close as 35 feet from the adjacent building at 505 Sansome Street. As shown in Table 10, temporary groundborne vibration levels from the caisson drill could reach as high as approximately 0.054 inch per second PPV if drilling for piles occurs 35 feet from the adjacent building, and as high as approximately 0.127 inch per second PPV if vibratory compaction were to occur 35 feet from the adjacent building. The proposed project would also require the use of heavy trucks for material deliveries and off-site hauling of excavated soils. The groundborne vibration from the loaded trucks 35 feet from the adjacent building could reach 0.045 inch per second PPV.

Table 10: Vibration Levels from Construction Equipment

Equipment	Approximate PPV (inch per second)		
	25 feet (FTA Reference Level)	35 feet (505 Sansome Street)	65 feet (530 Sansome Street)
Vibratory Compactor	0.21	0.127	0.050
Caisson Drill	0.089	0.054	0.021

[31] Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. Website: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed August 22, 2023.

Equipment	Approximate PPV (inch per second)		
	25 feet (FTA Reference Level)	35 feet (505 Sansome Street)	65 feet (530 Sansome Street)
Loaded Trucks	0.076	0.045	0.018

Notes:
PPV = peak particle velocity
Source: Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. Website: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed August 22, 2023.

While the City has not adopted any thresholds for construction or operational groundborne vibration impacts, this analysis uses the vibration criteria established in Caltrans' Transportation and Construction Vibration Guidance Manual document to evaluate the impact of vibration on buildings. The most frequently used method to describe vibration impacts on buildings is PPV. As shown in Table 11, the Caltrans guidelines for assessing vibration damage potential to various types of buildings range from 0.08 to 0.12 inch per second PPV for extremely fragile historic buildings, ruins, and ancient monuments to 0.50 to 2.0 inch per second PPV for modern industrial/commercial buildings.

Table 11: Caltrans Vibration Guidelines for Potential Damage to Structures

Maximum PPV (inches per second)		
Structure Conditions	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Notes:
Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack and seat equipment, vibratory pile drivers, and vibratory compaction equipment.

PPV = peak particle velocity

Sources: California Department of Transportation (Caltrans). 2020. Transportation and Construction Vibration Guidance Manual (Table 19, p. 38). Website: *https://dot*.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf. Accessed August 22, 2023.

The building at 505 Sansome Street is the closest off-site structure to the proposed construction footprint. It is a building of construction type that would be considered a "modern industrial/commercial building" with regard to the criteria presented in Table 11. As shown in Table 10, construction activities would not result in

vibration levels that would exceed the Caltrans criterion of 0.5 PPV applicable to modern structures (505 Sansome Street). The impact on adjacent buildings would be less than significant.

Impact C-NO-1: Implementation of the proposed project, in combination with reasonably foreseeable projects, would not result in a significant cumulative noise or vibration impacts. (*Less than Significant Impact*)

Construction Noise

Construction activities in the vicinity of the project site, such as excavation, grading, or construction of other buildings in the area, would occur on a temporary and intermittent basis. Project construction-related noise would not substantially increase ambient noise levels at locations greater than a few hundred feet from the project site. The only planned construction within reasonable proximity of the proposed project is the project at 530 Sansome Street.

Construction activities for the 530 Sansome Street project would not exceed daytime noise standards and would be required to comply with the City's special permit requirements to engage in nighttime work, just as this project would. If construction activities at both projects were to occur simultaneously, they would result in a combined noise level of 80 dBA, assuming the 65 dBA contribution from the 530 Sansom Street project, and the 80 dBA contribution from the proposed project. Therefore, the resultant noise level would not result in an increase of greater than 10 dBA over existing levels at the nearest receptor or exceed the FTA's 90 dBA criteria for daytime construction noise at a residential receptor. Therefore, project noise effects would not combine with the cumulative projects to result in cumulative construction noise impacts. Cumulative construction noise impacts would be less than significant.

Operational Noise

Project-related traffic and stationary noise would not exceed existing ambient background noise and therefore would not combine with any other noise sources in the project vicinity to result in cumulative operational noise impacts. The project's emergency generators are located below ground and noise produced by the emergency generators would be shielded from the surrounding area. Cumulative operational noise impacts would be less than significant.

Construction Vibration

Vibration dissipates rapidly with distance, such that vibration from vibration intensive activities such as pile driving can be reduced to urban background levels at about 300 feet from the source for most soil types. The project does not propose the use of pile driving during construction. With respect to cumulative vibration impacts, the other cumulative projects are sufficiently distant such that construction-related vibration from these projects would attenuate to background levels at the receptors. Cumulative construction vibration impacts would be less than significant.

E.7 Air Quality

Topics:		*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*	*Not Applicable*
E.7	**AIR QUALITY**					
	Would the project:					
a)	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐	☐
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal, State, or regional 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?	☐	☐	☒	☐	☐

The Bay Area Air Quality Management District (air district) is the regional agency with jurisdiction over the nine-county San Francisco Bay Area Air Basin (air basin), which includes: San Francisco, Alameda, Contra Costa, Marin, San Mateo, Santa Clara, and Napa Counties, and portions of Sonoma and Solano Counties. The air district is responsible for attaining and maintaining air quality in the air basin within federal and State air quality standards, as established by the federal Clean Air Act (federal Clean Air Act) and the California Clean Air Act (Clean Air Act), respectively. Specifically, the air district has the responsibility to monitor ambient air pollutant levels throughout the air basin and to develop and implement strategies to attain the applicable federal and State standards. The federal Clean Air Act and the Clean Air Act require plans to be developed for areas that do not meet air quality standards, generally.

The most recent air quality plan, the 2017 Clean Air Plan[32] (2017 Clean Air Plan), was adopted by the air district on April 19, 2017. The 2017 Clean Air Plan updates the most recent Bay Area ozone plan, the 2010 Clean Air Plan, in accordance with the requirements of the CCAA to implement all feasible measures to reduce ozone; provide a control strategy to reduce ozone, particulate matter, air toxics, and greenhouse (GHG) emissions in a single, integrated plan; and establish emission control measures to be adopted or implemented. The Clean Air Plan contains the following primary goals:

- Protect air quality and health at the regional and local scale: attain all state and national air quality standards, and eliminate disparities among Bay Area communities in cancer health risk from toxic air contaminants (TACs) and
- Protect the climate: reduce Bay Area GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

[32] Bay Area Management District (air district). 2017. Final 2017 Clean Air Plan. April 19. Website: https://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans. Accessed August 24, 2023.

Consistency with the 2017 Clean Air Plan is the basis for determining whether the proposed project would conflict with or obstruct implementation of air quality plans (Impact E.7.a).

Criteria Air Pollutants

In accordance with the State and federal clean air acts, air pollutant standards are identified for the following six criteria air pollutants: ozone, carbon monoxide (CO), particulate matter, nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead. These air pollutants are termed criteria air pollutants because they are regulated by developing specific public health and welfare-based criteria as the basis for setting permissible levels. The air basin is designated as either in attainment or unclassified for most criteria pollutants with the exception of ozone, $PM_{2.5}$, and PM_{10},[33] for which these pollutants are designated as nonattainment for either the State or federal standards.[34] Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG) and oxides of nitrogen (NO_X). Despite being in an air district-Impacted Community Air Risk Evaluation (CARE) area, the proposed project is not identified as being in an overburdened area for the purposes of district permitting rules.

By its very nature, regional air pollution is largely a cumulative impact in that no single project is sufficient in size to, by itself, result in nonattainment of air quality standards. Instead, a project's individual emissions contribute to existing cumulative air quality impacts. If a project's contribution to cumulative air quality impacts is "considerable," then the project's impact on air quality would be considered significant.

Land use projects typically result in ozone precursor and particulate matter emissions because of increases in vehicle trips, space heating and natural gas combustion, landscape maintenance, and construction activities. For this reason, the air district has established significance thresholds for nonattainment criteria air pollutants, as shown in the Criteria Air Pollutants Significance Thresholds (Table 12) below.

Table 12: Criteria Air Pollutants Significance Thresholds

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

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

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

The significance thresholds for ROG and NO_X are based on the stationary source limits in air district Regulation 2, Rule 2, which requires that any new source that emits criteria air pollutants above the ROG and NO_X emissions limit in Table 12, must offset those emissions. The significance thresholds for particulate matter are based on the emissions limit in the federal New Source Review for stationary sources in nonattainment areas. The air district CEQA Air Quality Guidelines[35] provide additional evidence to support these thresholds. Projects that would result in criteria air pollutant emissions below these significance thresholds would not result in a cumulatively considerable net increase in nonattainment criteria air pollutants within the air basin.[36] Because of the temporary nature of construction activities, only the average daily thresholds are applicable to construction phase emissions.

Fugitive Dust. Additionally, fugitive dust emissions are typically generated during construction phases. Studies have shown that the application of Best Management Practices (BMPs) at construction sites significantly control fugitive dust, and individual measures have been shown to reduce fugitive dust by anywhere from 30 to 90 percent.[37] The air district has identified a number of BMPs to control fugitive dust emissions from construction activities.[38] The City's Construction Dust Control Ordinance (Ordinance No.176-08, effective July 30, 2008) requires a number of measures to control fugitive dust and the BMPs employed in compliance with the City's Construction Dust Control Ordinance are an effective strategy for controlling construction-related fugitive dust.

Local Health Risks and Hazards

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

Unlike criteria air pollutants, TACs do not have ambient air quality standards but are regulated by the air district using a risk-based approach to determine which sources and pollutants to control as well as the degree of control. A Health Risk Assessment (HRA) is an analysis in which human health exposure to toxic substances is estimated and considered together with information regarding the toxic potency of the substances, to provide quantitative estimates of health risks.[39] Exposures to fine particulate matter (PM2.5) are strongly associated with mortality, respiratory diseases, and decreased lung development in children,

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35 Bay Area Air Quality Management District (air district). California Environmental Quality Act Air Quality Guidelines, April 2022. Website: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines. Accessed August 17, 2023.

36 Bay Area Air Quality Management District. (air district). CEQA Air Quality Guidelines, May 2017.

37 Western Regional Air Partnership (WRAP). 2006. WRAP Fugitive Dust Handbook. September 7, 2006. This document is available online at Website: http://www.wrapair.org/forums/dejf/fdh/content/FDHandbook_Rev_06.pdf. Accessed August 17, 2023.

38 Bay Area Air Quality Management District (air district). CEQA Air Quality Guidelines, April 2022.

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

and other endpoints such as hospitalization for cardiopulmonary disease.[40] In addition to PM2.5, diesel particulate matter (DPM) is also of concern. The California Air Resources Board (air board) identified DPM as a TAC in 1998, primarily based on evidence demonstrating cancer effects in humans.[41] The estimated cancer risk from exposure to diesel exhaust is much higher than the risk associated with any other TACs routinely measured in the region.

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

In an effort to identify areas of San Francisco most adversely affected by sources of TACs, San Francisco partnered with the air district to conduct a citywide HRA based on an inventory and assessment of air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed the air pollutant exposure zone were identified based on health-protective criteria that consider estimated cancer risk, exposures to fine particulate matter, proximity to freeways, and locations with particularly vulnerable populations, as further described below.

Excess Cancer Risk. The air pollutant exposure zone includes areas where modeled cancer risk exceeds 100 incidents per million persons exposed. This criterion is based on United States Environmental Protection Agency (EPA) guidance for conducting air toxic analyses and making risk management decisions at the facility and community-scale level.[42] The 100 per one million excess cancer cases is also consistent with the ambient cancer risk in the most pristine portions of the Bay Area based on air district regional modeling.[43]

Fine Particulate Matter. In April 2011, the EPA published the "Policy Assessment for the Particulate Matter Review of the National Ambient Air Quality Standards, Particulate Matter Policy Assessment." In this document, EPA staff strongly support a $PM_{2.5}$ standard within the range of 12 to 11 $\mu g/m^3$.[44] The air pollutant exposure zone for San Francisco is based on the health-protective $PM_{2.5}$ standard of 11 $\mu g/m^3$, as supported by the EPA's Policy Assessment for the Particulate Matter Review of the National Ambient Air Quality Standards, although lowered to 10 $\mu g/m^3$ to account for uncertainty in accurately predicting air pollutant concentrations using emissions modeling programs.

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40 San Francisco Department of Public Health, Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review, May 2008.

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

42 Bay Area Air Quality Management District (air district). Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance, October 2009.

43 Bay Area Air Quality Management District (air district). CEQA Air Quality Guidelines, May 2017

44 Bay Area Air Quality Management District (air district). Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance, October 2009.

Proximity to Freeways. According to the California Air Resources Board (air board), studies have shown an association between the proximity of sensitive land uses to freeways and a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children. Siting sensitive uses near freeways increases both exposure to air pollution and the potential for adverse health effects. As evidence shows that sensitive uses in an area within a 500-foot buffer of any freeway are at an increased health risk from air pollution,[45] lots that are within 500 feet of freeways are included in the air pollutant exposure zone.

Health Vulnerable Locations. Based on the air district's evaluation of health vulnerability in the Bay Area, those zip codes (94102, 94103, 94110, 94124, and 94134) in the worst quintile of Bay Area health vulnerability scores as a result of air pollution-related causes were afforded additional protection by lowering the standards for identifying lots in the air pollutant exposure zone to: (1) an excess cancer risk greater than 90 per one million persons exposed, and/or (2) $PM_{2.5}$ concentrations in excess of 9 $\mu g/m^3$.[46]

The above citywide health risk modeling is referenced in the Enhanced Ventilation Required for Urban Infill Sensitive Use Developments, or Health Code Article 38 (Ordinance No. 224-14, effective December 8, 2014) (Article 38). The purpose of Article 38 is to protect the public health and welfare by establishing an air pollutant exposure zone and imposing an enhanced ventilation requirement for all urban infill sensitive use development within that zone. The project site is located within the air pollutant exposure zone and Health Code Article 38 does apply to the proposed project. In addition, projects within the air pollutant exposure zone require special consideration to determine whether the project's activities would add substantial emissions to areas already adversely affected by poor air quality.

Impact Analysis

Impact AQ-1: The proposed project would not conflict with or obstruct implementation of the 2017 Clean Air Plan. *(Less than Significant Impact)*

In determining consistency with the 2017 Clean Air Plan, this analysis considers whether the project would: (1) support the primary goals of the plan, (2) include applicable control measures from the plan, and (3) avoid disrupting or hindering implementation of control measures identified in the plan.

The primary goals of the Clean Air Plan are to: (1) protect air quality and health at the regional and local scale; (2) eliminate disparities among Bay Area communities in cancer health risk from TACs; and (3) protect the climate by reducing greenhouse gas emissions. To meet the primary goals of the Clean Air Plan, the plan recommends 85 specific control measures and actions. To the extent that the air district has regulatory authority over an emissions source generated by the proposed project, the control measures may be requirements of the proposed project. Other measures in the plan not within the air district's regulatory authority may be advisory or are otherwise not specifically applicable to land use development projects.

The Clean Air Plan recognizes that to a great extent, community design dictates individual travel mode, and that a key long-term control strategy to reduce emissions of criteria pollutants, air toxics, and greenhouse gases from motor vehicles is to channel future Bay Area growth into vibrant urban communities where goods and services are close at hand, and people have a range of viable transportation options. The control

[45] California Air Resources Board. Air Quality and Land Use Handbook: A Community Health Perspective, April 2005. Website: https://rb.gy/akufy. Accessed August 25, 2023.

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

measures most applicable to the proposed project are transportation control measures and energy and climate control measures. The proposed project's impacts with respect to GHGs are discussed in Section E.8, Greenhouse Gas Emissions, which demonstrates that the proposed project would comply with the applicable provisions of the City's Greenhouse Gas Reduction Strategy.

The proposed project would not implement any changes to the roadway network that have the potential to interfere with accessibility of people walking or bicycling to and from the project site and adjoining areas, . As a result, the proposed project would not discourage people from walking and bicycling near the project site. The proposed project's 214 daily vehicle trips would result in a negligible increase in air pollutant emissions. Transportation control measures that are identified in the Clean Air Plan are implemented by the San Francisco General Plan and the Planning Code, for example, through the City's Transit First Policy, bicycle parking requirements, and transit impact development fees. Compliance with these requirements would ensure the proposed project includes relevant transportation control measures specified in the Clean Air Plan. Therefore, the proposed project would include applicable control measures identified in the Clean Air Plan to meet the General Plan primary goals.

Examples of projects that could cause the disruption or delay of the Clean Air Plan control measures are projects that would preclude the extension of a transit line or bike path, or projects that propose excessive parking beyond parking requirements. The proposed project does not include off-street parking and would not preclude the extension of a transit line or a bike path or any other transit improvement. Thus the project would not disrupt or hinder implementation of the Clean Air Plan's control measures.

For the reasons described above, the proposed project would not conflict with or obstruct implementation of the Clean Air Plan and this impact would be less than significant.

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

Construction activities (short-term) typically result in emissions of ozone precursors and particulate matter in the form of dust (fugitive dust) and exhaust (e.g., vehicle tailpipe emissions). Emissions of ozone precursors and particulate matter are primarily a result of the combustion of fuel from on-road and off-road vehicles and other construction equipment. However, ROGs are also emitted from activities that involve painting, other types of architectural coatings, or asphalt paving. During the proposed project's approximately 28-month construction period, construction activities would have the potential to result in emissions of ozone precursors and particulate matter, as discussed below.

Fugitive Dust

Proposed project-related demolition, excavation, grading, and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. Depending on exposure, adverse health effects can occur due to this particulate matter in general and due to specific contaminants, such as lead or asbestos that may be constituents of soil. The current health burden of particulate matter demands that, where possible, public agencies take feasible available actions to reduce sources of particulate matter exposure.

In response, the San Francisco Board of Supervisors approved the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) with the intent of reducing the quantity of dust generated during site preparation, demolition, and construction work in order to protect the health of the general public and of on-site workers, minimize public nuisance complaints, and to avoid orders to stop work by the department of building inspection.

The Construction Dust Control Ordinance requires that all site preparation work, demolition, or other construction activities within San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures whether or not the activity requires a permit from the department of building inspection.

In compliance with the Construction Dust Control Ordinance, the project sponsor and the contractor responsible for construction activities at the project site would be required to control construction dust on the site through a combination of watering disturbed areas, covering stockpiled materials, street and sidewalk sweeping, and other measures. Compliance with the regulations and procedures set forth by the dust control ordinance would ensure that potential dust-related air quality impacts would be reduced to less than significant.

Criteria Air Pollutants

As discussed above, construction activities would result in emissions of criteria air pollutants from the use of off- and on-road vehicles and equipment.

Emissions from construction are based on an applicant provided construction schedule of 28 months, based on project-specific phasing and construction equipment usage lists. The proposed project was modeled as Office Space, Restaurant/High-Quality Sit-Down Restaurant and City Park (to represent Open Space). The square footage in the CalEEMod model was increased to represent gross square footage to capture all construction-related emissions and included area related to hallways, mechanical rooms, and terrace areas, as not to underestimate construction emissions based on square footage (such as architectural coating requirements). The proposed project would not include any automobile parking spaces or parking lot and therefore it was not included in the modeling. Additionally, the project has committed to using Tier 4 engines on all diesel-fueled construction equipment pursuant to Director Bulletin No. 2 for Type 3, Clean Construction projects), for which the application was accepted on May 17, 2023.

Under this program, all off-road construction equipment greater than 25 hp and operating more than 20 hours per year is required to meet Tier 4 Interim or Tier 4 Final standards. It also provides for more stringent idling requirements than State law requires, that all diesel engines, whether for off-road or on-road equipment or vehicles, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable State regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions).

Furthermore, the project construction would utilize grid power and an electric tower crane for substantial portions of the construction for the superstructure, exterior and exterior/façade phases. Small construction equipment such as signal boards, air compressors, pressure washers and welders will utilize electricity instead of being diesel-powered.

The quantitative analysis of construction emissions presented below in Table 13 represents the proposed project's construction as quantified using CalEEMod. Default assumptions were used where project-specific

information was unknown. Construction of the proposed project would occur over approximately 28 months, five days per week.

Table 13: Phases and Emissions of Criteria Pollutants (pounds/phase)

	ROG	NO_X	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
Demolition	83.76086405	1788.235309	11.26205236	10.97266671
Grading	97.47639453	2179.156901	18.0650207	17.50331438
Building Construction	52.80165259	829.7010988	4.382588593	4.301375587
Exterior Façade	539.6179193	337.6765731	4.838171415	4.532043881
Core + Interiors	1120.739819	802.3770572	9.85816015	9.362961119
Total Pounds	**1,894.4**	**5,937.1**	**48.4**	**46.7**
Average pound/day	**3.11**	**9.75**	**0.08**	**0.08**

This demonstrates that the emissions are below the air district CEQA daily thresholds for criteria pollutants and precursors. Annual and daily emissions broken out for each calendar of construction are further presented in Table 14. As shown in Table 14, proposed project construction emissions would not exceed any of the significance thresholds for criteria air pollutants in any given year in which construction would be taking place and would result in a less than significant impact with respect to criteria air pollutant emissions during construction.

Table 14: Average Daily Construction Emissions by Year for the Proposed Project

Year	Average Daily Emissions (pounds/day) Unmitigated			
	ROG	NO_X	PM_{10}	$PM_{2.5}$
2024	0.965	12.900	0.091	0.088
2025	3.515	2.856	0.035	0.033
2026	0.7115	0.511	0.0061	0.006
Significance Threshold (pounds/day)	54.0	54.0	82.0	54.0

Notes:
ROG = reactive organic gases
NOx = oxides of nitrogen
PM_{10} = particulate matter less than or equal to 10 microns in diameter
$PM_{2.5}$ = particulate matter less than or equal to 2.5 microns in diameter

Sources: Results: Bay Area Air Quality Management District, 2023. California Environmental Quality Act Air Quality Guidelines, April 2023.

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

The proposed project would generate criteria pollutant emissions associated with vehicle traffic (mobile sources), on-site area sources (i.e., consumer product use and grounds maintenance equipment), and testing of backup diesel generators. The building would be all-electric design and the energy source emissions from space and water heating would be zero. Operational-related criteria air pollutants generated by the proposed project were quantified using CalEEMod and shown in Table 15. Default assumptions were used where project-specific information was unknown.

Table 15: Summary of Unmitigated Operational Criteria Pollutant Emissions for the Proposed Project

	Average Daily Emissions (pounds/day)				Maximum Annual Emissions (tons/year)			
	ROG	NO_X	PM_{10}	$PM_{2.5}$	ROG	NO_X	PM_{10}	$PM_{2.5}$
Area Source Emissions	1.11	0.01	—	—	0.2027	0.0017	—	—
Energy Emissions	—	—	—	—	—	—	—	—
Mobile Source Emissions	0.31	0.25	1.21	0.31	0.0569	0.0454	0.2203	0.0566
Stationary Sources Emissions	0.09	0.25	0.01	0.01	0.0165	0.0461	0.0024	0.0024
Total Emissions	**1.51**	**0.51**	**1.22**	**0.32**	**0.28**	**0.09**	**0.223**	**0.059**
Significance Threshold	**54**	**54**	**82**	**54**	**10.0**	**10.0**	**15.0**	**10.0**

Notes:
ROG = reactive organic gases
NO_X = oxides of nitrogen
PM_{10} = particulate matter less than 10 microns in diameter
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter

Sources: Bay Area Air Quality Management District. 2023; FirstCarbon Solutions. Air Quality Technical Memorandum, 2023.

The results show that the proposed project would not exceed any of air district significant thresholds for criteria air pollutants and precursors and would result in a less than significant impact.

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

In addition to regional criteria air pollutants analyzed above, the following air quality analysis evaluates localized health risks to determine whether sensitive receptors would be exposed to substantial pollutant concentrations. In 2014, the Board of Supervisors approved amendments to the San Francisco Building and Health Codes, referred to as Enhanced Ventilation Required for Urban Infill Sensitive Use Developments or Health Code Article 38 (Ordinance 224-14). The purpose of Article 38 is to protect the public health and welfare by establishing an air pollutant exposure zone and imposing an enhanced ventilation requirement for all new sensitive uses within this zone. The air pollutant exposure zone as defined in Article 38 includes areas that exceed health-protective standards for cumulative $PM_{2.5}$ concentration and cumulative excess cancer risk and incorporates health vulnerability factors and proximity to freeways. Projects within the air pollutant exposure zone require special consideration to determine whether the project's activities would expose sensitive receptors to substantial air pollutant concentrations or add emissions to areas already adversely affected by poor air quality.

Table 16: Health Risk Significance Thresholds for Projects in Air Pollution Exposure Zones

Affected Sensitive Receptors	Project Significance Thresholds	
	Annual Average $PM_{2.5}$ Concentration ($\mu g/m^3$)	Excess Cancer Risk (cases per 1 million population)
Project health risk contributions to sensitive receptors within the Air Pollution Exposure Zone	0.2	7.0

Projects that propose sensitive uses and are located within the air pollutant exposure zone, such as the proposed project, must provide filtration to protect occupants from $PM_{2.5}$. Health Code Article 38 requires that the project sponsor submit an Enhanced Ventilation Proposal for approval by the Department of Public Health (health department) that achieves protection from $PM_{2.5}$ equivalent to that associated with a Minimum Efficiency Reporting Value 13 filtration. The Building Department will not issue a building permit without written notification from the Director of Public Health that the applicant has an approved Enhanced Ventilation Proposal. In compliance with Article 38, the project sponsor has submitted an initial application to the health department.[47] The regulations and procedures set forth by Article 38 would reduce exposure of the proposed project's sensitive receptors to pollutant concentrations.

With respect to existing sensitive receptors within the Air Pollution Exposure Zone, there will be buildings and receptors that include the Article 38 enhanced filtration. However, there will also be buildings that were constructed prior to the 2014 regulation and are not mitigated. Therefore, the HRA exposure calculations assume all existing off-site receptors are without filtration mitigation. For cumulative future projects, Article 38 is required and included as part of the baseline assessment.

The proposed project would generate TACs during construction from the use of diesel-powered construction equipment, from the diesel exhaust of haul trucks utilized for haul of construction debris, soil, and delivery of materials and from the testing and use of the emergency diesel generator. The construction and operational health risks from the proposed project emissions are further analyzed below.

[47] Application for Article 38 Compliance Assessment, 395 3rd Street, October 29, 2021.

Construction Emissions

Both the EPA and the air board have set emissions standards for new off-road equipment engines, ranging from Tier 1 to Tier 4. The latest emissions standards, Tier 4 Interim and Final emission standards for all new engines, were phased in between 2008 and 2015. Although the full benefits of these regulations will not be realized for several years, the EPA estimates that by implementing the federal Tier 4 standards, NOx and particulate matter emissions will be reduced by more than 90 percent.[48] The implementation of Directors Bulletin DB2 Clean Construction Fleet would realize these reductions for the project since it would restrict off-road construction equipment selection to the cleanest equipment, except in conditions where it is documented that it is not available and exceptions are provide via a waiver mechanism.

In addition, construction activities do not lend themselves to analysis of long-term health risks because of their temporary and variable nature. Project-level analyses of construction activities tend to overestimate assessments of long-term health risks. However, within the air pollutant exposure zone, additional construction activity may adversely affect populations that are already at a higher risk for adverse long-term health risks from existing sources of air pollution. Therefore, a quantitative HRA was conducted, and a summary of the results presented herein.

The area surrounding the project site consists primarily of office and commercial, and therefore nonresidential land use. Sensitive land uses in proximity to the project site encompass a residential unit positioned 125 meters away at the intersection of Battery and Washington, a mixed-use residential area (582 Washington Street) adjacent to Hotaling Place situated 50 meters northwest of the project site, and a school located 170 meters to the west of the project site at 657 Merchant Street. Notably the development of the vacant property directly across the street to the east (530 Sansome) features a residential variant. If developed, it would constitute a future residential sensitive land use. Land use designations for properties surrounding the site were obtained from City of San Francisco Planning Maps to identify residential occupied buildings, particularly those in mixed-use buildings. Local map searches as use of the California Department of Social Services Community Care facility search were utilized to identify any child care facilities within 1,000 feet: none was identified.

The proposed project would require construction activities over approximately 28 months. The proposed project's construction activities would result in short-term emissions of DPM and other TACs. The project site is located in an area that already experiences poor air quality and project construction activities would generate additional air pollution, affecting nearby sensitive receptors. However, the project includes implementation of the DB2 Clean Construction program and therefore would not result in a potentially significant health risk.

Detailed methodology, results, and dispersion and exposure assessment modeling for health risks related to the construction and operation of the project are included in detail in the Air Quality Technical Memorandum. The analysis includes impact of diesel PM_{10} exhaust emissions from on-site construction equipment and heavy-duty haul trucks making trips to and from the project site. Results were determined for the most impacted residential receptor (located at 582 Washington Street), the most impacted off-site worker (commercial office worker at from the site during demolition, foundation/earthmoving and the construction activities. Truck routes were included along Battery, Keaney and Montgonery Streets within 1,000 feet of the 500 Sansome Street), and the nearest elementary school (Edwin and Anita Lee Newcomber

[48] United States Environmental Protection Agency (EPA). Clean Air Nonroad Diesel Rule: Fact Sheet, May 2004.

Elementary School at 657 Merchant Street). Since the proposed project is located in an APEZ with high levels of pre-existing background risk, cancer risks and $PM_{2.5}$ concentration thresholds SF Planning uses are more stringent than those in air district CEQA Guidelines. The results of the HRA set forth in Table 17 demonstrate that health-related impacts due to diesel exhaust emissions from on-site construction equipment and vendor and haul truck diesel exhaust are less than significant. HRA Results for the future residential receptors at 530 Sansome Street incorporate Clean Fleet Mitigation Measure and Article 38 Enhanced Filtration reductions from MERV-13 filters that apply to new construction in the APEZ.

Table 17: Construction HRA Impacts for Proposed Project

Receptor	Cancer (Risk in a Million)	Max Chronic HI (DPM)	Max Annual $PM_{2.5}$ (ug/m^3)
Resident	5.35	0.0042	0.02047
Future Resident (530 Sansome Resident)	4.4176	0.003475069	0.016888293
Elementary School (Edwin and Anita Lee Newcomber Elementary School)	0.25	0.0009	0.00563
Off-Site Worker	0.8	0.0061	0.04
Threshold	**7**	**1**	**0.2**
Exceeds Project health risk contributions to sensitive receptor within APEZ Zone	No	No	No

OPERATIONAL EMISSIONS

The proposed project would generate new vehicle trips and include a diesel emergency generator, both of which would emit TACs. The air district considers roads with less than 10,000 vehicles per day "minor, low-impact" sources that do not pose a significant health impact even in combination with other nearby sources. These determinations were made through extensive modeling, source tests, and evaluation of their toxic air contaminant emissions.[49] The proposed project's 214 daily vehicle trips would be well below this level and would be distributed among the local roadway network; therefore, an assessment of project-generated TACs resulting from vehicle trips is not required and the proposed project would not generate a substantial amount of toxic air contaminant emissions that could affect nearby sensitive receptors.

The proposed project would also include a diesel emergency generator for the building. Emergency generators are regulated by the air district through its New Source Review (Regulation 2, Rules 2 and 5) permitting process. The project sponsor would be required to obtain applicable permits to operate the emergency generators from the air district and would thus also be restricted to operating the emergency generators for no more than 50 hours per year for testing purposes. Additionally, as part of the permitting process, the air district would limit the excess cancer risk from any facility to no more than 10 per one

[49] Bay Area Air Quality Management District (air district). Recommended Methods for Screening and Modeling Local Risks and Hazards, 2022. Website: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-e-recommended-methods-for-screening-and-modeling-local-risks-and-hazards_final-pdf.pdf?la=en, Accessed August 29, 2023.

million population (applicable to sources outside of overburdened areas and their buffer zone) and requires any source that would result in an excess cancer risk greater than one per one million population to install best available control technology for toxics.

The health risk from the maintenance and testing operation of the emergency generator was assessed in the Air Quality Technical Memorandum along with the construction emissions. The detailed methodology, results and dispersion and exposure assessment modeling for health risks related to operation of the are included in detail in the Air Quality Technical Memorandum for the proposed project, available at *https://sfplanninggis.org/pim/*. Table 18 presents the operational HRA impacts for the proposed project. HRA Results for the future residential receptors at 530 Sansome Street incorporate Clean Fleet Mitigation Measure and Article 38 Enhanced Filtration reductions from MERV-13 filters that apply to new construction in the APEZ.

Table 18: Operational HRA Impacts for the Proposed Project

Receptor	Cancer (Risk in a Million)	Max Chronic HI (DPM)	Max Annual PM2.5E (ug/m^3)
Resident	0.24	0.0001	0.00031
Future Reference (530 Sansome)	0.105452	2.77811E-05	0.000133835
Elementary School (Edwin and Anita Lee Newcomber ES)	0.011	0.00001	0.00006
Off-Site Worker	0.03	0.0001	0.0005
Threshold	**7**	**1**	**0.2**
Exceeds Project health risk contributions to sensitive receptor within APEZ Zone	No	No	No

Cancer and chronic health impacts from the operation of the diesel-fueled emergency generator were found to be well below both CEQA and air district New Source Review permitting thresholds, without the need for any mitigation. Therefore, the operational impact of the building with the generator emissions is less than significant without mitigation.

In summary, the proposed project's toxic air contaminant emissions would be less than significant and operational impacts considering the emergency generator emissions would be less than significant.

Impact AQ-5: The proposed project would not create objectionable odors that would affect a substantial number of people. (*Less than Significant Impact*)

Typical odor sources of concern include wastewater treatment plants, sanitary landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing facilities, fiberglass manufacturing facilities, auto body shops, rendering plants, and coffee roasting facilities. During construction, diesel exhaust from construction equipment would generate some odors. However, construction-related odors would be temporary and would not persist upon project completion. The proposed project uses are not typical odor sources of concern and would not create a significant source of

new odors. Therefore, the proposed project would not result in other emissions, such as odors, that could adversely affect a substantial number of people and this impact would be less than significant.

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

As discussed above, regional air pollution is by its very nature largely a cumulative impact. Emissions from cumulative projects contribute to the region's adverse air quality on a cumulative basis. No single project by itself would be sufficient in size to result in regional nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulative adverse air quality impacts.[50] The project-level thresholds for criteria air pollutants are based on levels below which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants. Therefore, cumulative criteria air pollutant analysis is presented in Impacts AQ-2 and AQ-3. Impacts AQ-2 and AQ-3 concluded that cumulative criteria air pollutant impacts would be less than significant. The remainder of this cumulative air quality analysis addresses cumulative health risks and odors to sensitive receptors.

As discussed above, the project site is in the air pollutant exposure zone and nearby sensitive receptors already experience poor air quality. This means significant air quality health risk impacts exist even without the proposed project. The proposed project and cumulative projects in the vicinity such as 530 Sansome Street, 650 Sacramento Street, 425 Broadway, 17 Osgood Place, 733 Kearny Street (Portsmouth Square Garage Renovation), 100 Columbus Avenue, 600 Montgomery Street, 749 Grant Avenue, 875 Sansome Street, 900 Sansome Street, 400 California Street, and 220 Battery Street, would result in additional emissions of TACs, including DPM emissions from new vehicle trips and other stationary emissions sources similar to the proposed project's diesel generator emissions, as well as diesel emissions from construction activities.

As described in Impact AQ-4, above, the proposed project's 214 average daily vehicle trips would be considered minor low-impact sources that do not pose a significant health impact even in combination with other nearby sources. However, the proposed project would involve construction activities that require off-road equipment and/or backup generators that emit DPM and other TACs. Therefore, the proposed project could result in a considerable contribution to significant cumulative health risks. This would be a significant cumulative impact. As described in Impact AQ-4, the project sponsor has an accepted application in the DB2 program for Clean Construction Projects and would be required to utilize clean off-road construction equipment which could reduce the proposed project's diesel particulate emissions by as much as 96 percent. Implementation of these mitigation measures along with Article 38 Enhanced Filtration Requirements in the new building structure would reduce the proposed project's contribution to cumulative health risk impacts to less than significant.

The proposed project and cumulative projects would generate some odors during construction, but odors would be temporary. Upon completion of construction activities cumulative projects combined with the proposed project would not generate substantial odors. Therefore, cumulative odor impacts would be considered less than significant.

[50] Bay Area Air Quality Management District (air district). CEQA Air Quality Guidelines, May 2017.

E.8 Greenhouse Gas Emissions

Topics:	*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*	*Not Applicable*
E.8 GREENHOUSE GAS EMISSIONS					
Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐	☐
b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐	☐

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

The air district has prepared guidelines and methodologies for analyzing GHGs. These guidelines are consistent with CEQA Guidelines Sections 15064.4 and 15183.5, which address the analysis and determination of significant impacts from a proposed project's GHG emissions. CEQA Guidelines Section 15064.4 allows lead agencies to rely on a qualitative analysis to describe GHG emissions resulting from a project. CEQA Guidelines Section 15183.5 allows for public agencies to analyze and mitigate GHG emissions as part of a larger plan for the reduction of GHGs and describes the required contents of such a plan. As such, the proposed project's GHG impact significance is evaluated based on its consistency with the City's GHG reduction strategy.

San Francisco has prepared Strategies to Address Greenhouse Gas Emissions,[51] which presents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco's qualified GHG reduction strategy in compliance with the CEQA Guidelines. These GHG reduction actions have resulted in a 48 percent reduction in GHG emissions in 2020 compared to 1990 levels,[52] which far exceeds the goal of 2020 GHG emissions equaling those in 1990 set in Executive Order S-3-05[53] and the

[51] San Francisco Planning Department. Strategies to Address Greenhouse Gas Emissions in San Francisco, July 2017. Website: https://sfplanning.org/project/greenhouse-gas-reduction-strategies. Accessed August 29, 2023.

[52] San Francisco Department of the Environment. San Francisco's 2020 Carbon Footprint. Website: https://sfenvironment.org/carbonfootprint. Accessed August 31, 2023.

[53] Office of the Governor, Executive Order S-3-05, June 1, 2005. Website: https://www.library.ca.gov/wpcontent/uploads/GovernmentPublications/executive-order-proclamation/5129-5130.pdf. Accessed August 31, 2023.

California Global Warming Solutions Act.[54] The City has also met and exceeded the 2030 target of 40 percent reduction below 1990 levels set in the California Global Warming Solutions Act of 2016[55] and the air district's 2017 Clean Air Plan[56] more than 10 years before the target date.

San Francisco's GHG reduction goals, updated in July 2021 by Ordinance 117-02,[57] are consistent with, or more aggressive than, the long-term goals established under Executive Orders S-3-05,[58] B-30-15,[59] B-55-18,[60] the California Global Warming Solutions Act of 2016.[61] The updated GHG ordinance demonstrates the City's commitment to continued GHG reductions by establishing targets for 2030, 2040, and 2050 and setting other critical sustainability goals. In particular, the updated ordinance sets a goal to reach net zero sector-based GHG emissions by 2040 and sequester any residual emissions using nature-based solutions.[62] Thus, the City's GHG reduction goal is consistent with the State's long-term goal of reaching carbon neutrality by 2045 as laid out in the 2022 Scoping Plan.[63] The updated GHG ordinance requires the San Francisco Department of the Environment to prepare and submit to the mayor a Climate Action Plan (CAP) by December 31, 2021. The CAP, which was released on December 8, 2021, and will be updated every 5 years, carries forward the efforts of the City's previous CAPs and charts a path toward meeting the GHG

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54 California Legislative Information. Assembly Bill 32. September 27, 2006. Website: http://www.leginfo.ca.gov/pub/05-06/bill/asm/ab_0001- 0050/ab_32_bill_20060927_chaptered.pdf. Accessed August 31, 2023.

55 California Legislative Information. Senate Bill 32. September 8, 2016. Website: https://leginfo.legislature.ca.gov/faces/billPdf.xhtml?bill_id=201520160SB32&version=20150SB3288CHP. Accessed August 31, 2023.

56 Bay Area Air Quality Management District (air district). 2017. Clean Air Plan. September 2017. Website: http://www.baaqmd.gov/plans-and-climate/airquality-plans/current-plans. Accessed August 31, 2023.

57 San Francisco Board of Supervisors. Ordinance No. 117-21, File No. 210563. July 20, 2021. Website: https://sfbos.org/sites/default/files/o0117- 21.pdf. Accessed August 31, 2023. San Francisco's GHG reduction goals are codified in section 902(a) of the Environment Code and include the following goals: (1) by 2030, a reduction in sector-based GHG emissions of at least 61 percent below 1990 levels; (2) by 2030, a reduction in consumption-based GHG emissions equivalent to a 40 percent reduction compared to 1990 levels; (3) by 2040, achievement of net zero sector-based GHG emissions by reducing such emissions by at least 90 percent compared to 1990 levels and sequestering any residual emissions; and (4) by 2050, a reduction in consumption-based GHG emissions equivalent to an 80 percent reduction compared to 1990 levels.

58 Executive Order S-3-05 sets forth a goal of an 80 percent reduction in GHG emissions by 2050. San Francisco's goal of net zero sector-based emissions by 2040 requires a greater reduction of GHG emissions.

59 Office of the Governor. Executive Order B-30-15, April 29, 2015. Website: https://www.ca.gov/archive/gov39/2015/04/29/news18938/. Accessed August 31, 2023. Executive Order B-30-15 sets a State GHG emissions reduction goal of 40 percent below 1990 levels by 2030. San Francisco's 2030 sector-based GHG reduction goal of 61 percent below 1990 levels requires a greater reduction of GHG emissions.

60 Office of the Governor, Executive Order B-55-18, September 18, 2018. Website: https://www.ca.gov/archive/gov39/wpcontent/uploads/2018/09/9.10.18-Executive-Order.pdf. Accessed: August 31, 2023. Executive Order B-55-18 establishes a statewide goal of achieving carbon neutrality as soon as possible, but no later than 2045, and achieving and maintaining net negative emissions thereafter. San Francisco's goal of net zero sector-based emissions by 2040 is a similar goal but requires achievement of the target five years earlier.

61 Senate Bill 32 amends California Health and Safety Code Division 25.5 (also known as the California Global Warming Solutions Act of 2006) by adding Section 38566, which directs that statewide greenhouse gas emissions be reduced by 40 percent below 1990 levels by 2030. San Francisco's 2030 sector-based GHG reduction goal of 61 percent below 1990 levels requires a greater reduction of GHG emissions.

62 Nature-based solutions are those that remove remaining emissions from the atmosphere by storing them in natural systems that support soil fertility or employing other carbon farming practices.

63 California Air Resources Board. 2022. 2022 Scoping Plan. Website: https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents#:~:text=The%202022%20Scoping%20Plan%20Update%20focuses%20on%20outcomes%20needed%20to,economic%2C%20environmental%2C%20energy%20security%2C. Accessed August 31, 2023.

commitments of the Paris Agreement (e.g., limit global warming to 1.5 degrees Celsius) as well as the reduction targets adopted in the GHG ordinance.

In summary, the CEQA Guidelines and GHG thresholds adopted by the air board allow projects consistent with an adopted GHG reduction strategy to determine a less than significant GHG impact. San Francisco has a GHG reduction strategy that is consistent with near and long-term State and regional GHG reduction goals and is effective because the City has demonstrated its ability to meet State and regional GHG goals in advance of target dates. Therefore, projects that are consistent with San Francisco's GHG reduction strategy would not result in GHG emissions that would have a significant effect on the environment, and would not conflict with State, regional, or local GHG reduction plans and regulations.

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

Individual projects contribute to the cumulative effects of climate change by directly or indirectly emitting GHGs during construction and operational phases. Direct operational emissions include GHG emissions from new vehicle trips and area sources (natural gas combustion). Indirect emissions include emissions from electricity providers; energy required to pump, treat, and convey water; and emissions associated with waste removal, disposal, and landfill operations.

The proposed project would increase the intensity of use of the site by constructing a six-story vertical and horizontal addition to an existing nine-story building, resulting in a 15-story office building. Therefore, the proposed project would contribute to annual long-term increases in GHGs as a result of increased vehicle trips (mobile sources) and commercial or residential operations that result in an increase in energy use, water use, wastewater treatment, and solid waste disposal. Construction activities would also result in temporary increases in GHG emissions. The proposed project completed a GHG Checklist dated August 25, 2023, which can be accessed on the City's website for this project.[64]

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

Compliance with the City's Commuter Benefits Ordinance, transportation management programs, Transportation Sustainability Program, Jobs-Housing Linkage Program, and bicycle parking requirements would reduce the proposed project's transportation-related emissions. These regulations reduce GHG emissions from single-occupancy vehicles by promoting the use of alternative transportation modes with zero or lower GHG emissions on a per capita basis.

The proposed project would be required to comply with the energy efficiency requirements of the City's green building code, Stormwater Management Ordinance and Water Efficient Irrigation Ordinance which would promote energy and water efficiency, thereby reducing the proposed project's energy-related GHG

64 Greenhouse Gas Analysis: Table 1. Private Development Projects. 2023. Website: https://sfplanninggis.org/pim/

emissions.[65] Specifically, the proposed project would be all-electric in compliance with the green building code. The proposed project would also be required to comply with the Commercial Water Conservation Ordinance. Additionally, the proposed project would be required to meet the renewable energy criteria of the green building code, including renewable energy generation or green roof installation, further reducing the project's energy-related GHG emissions.

The proposed project's waste-related emissions would be reduced through compliance with the City's Recycling and Compositing Ordinance, Construction and Demolition Debris Recovery Ordinance, Construction and Demolition Debris Recycling, and green building code requirements. These regulations reduce the amount of materials sent to a landfill, reducing GHGs emitted by landfill operations. These regulations also promote reuse of materials, conserving their embodied energy[66] and reducing the energy required to produce new materials.

Compliance with the City's street tree planting requirements would serve to increase carbon sequestration. Other regulations, including those limiting refrigerant emissions and the air district's wood-burning regulations, would reduce emissions of GHGs and black carbon, respectively. Regulations requiring low-emitting finishes would reduce volatile organic compounds.[67] Thus, the proposed project was determined to be consistent with San Francisco's GHG reduction strategy.[68]

In addition, the proposed project would comply with other applicable regulations that would reduce the project's GHG emissions related to energy use and waste disposal. As discussed above, these regulations have proved effective as San Francisco has reduced its GHG emissions by 48 percent below 1990 levels, which far exceed statewide and regional 2020 GHG reduction targets. Furthermore, the City's GHG emission reductions in 2020 also met statewide and regional 2030 targets more than 10 years in advance of the target year. Therefore, because the proposed project would be subject to regulations adopted to reduce GHG emissions, the proposed project would be consistent with San Francisco's GHG reduction strategy and would not generate significant GHG emissions or conflict with State, regional, and local GHG reduction plans and regulations.

Therefore, because the proposed project would be consistent with the City's GHG reduction strategy as well as the air district's performance criteria related to GHGs, it would also be consistent with the GHG reduction goals of Executive Orders S-3-05, B-30-15, B-55-18, California Global Warming Solutions Act of 2016, the Clean Air Plan, and the 2022 Scoping Plan, and would not conflict with these plans. As such, the proposed project impact would be less than significant with respect to GHG emissions, and no mitigation would be required.

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

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

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

[68] San Francisco Planning Department. Greenhouse Gas Analysis: Compliance Checklist for 530 Sansome Street, December 20, 2019.

E.9 Wind

Topics:		Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
E.9	**WIND**					
	Would the project:					
a)	Create wind hazards in publicly accessible areas of substantial pedestrian use?	☐	☐	☒	☐	☐

The information in this section is based on a pedestrian wind study prepared for the proposed project by RWDI.[69] San Francisco experiences its highest average wind speeds in the summer, and lowest average wind speeds in the winter. However, the strongest peak wind speeds occur in winter, and wind direction is also most variable during this time of year. Wind speeds fluctuate throughout the day, with the highest average wind speeds occurring during the mid-afternoon and the lowest in the early morning. Long-term wind data were generated by RWDI using a Weather Research and Forecasting (WRF) model for the entire City of San Francisco. WRF wind speeds for the downtown area These are calculated wind speeds from 07:00 to 18:00 between 2000 and 2019, scaled to 33 feet above an open terrain1 Wind statistics were combined with the wind tunnel data to predict the frequency of occurrence of full-scale wind speeds. The full-scale wind predictions were then compared against the criteria for wind comfort and hazard as stated in the San Francisco Planning Code Section 148. Based on over 40 years of recordkeeping at the old San Francisco Federal Building near Civic Center, the highest mean hourly wind speeds (approximately 20 miles per hour [mph]) occur in July, while the lowest mean hourly wind speeds (in the range of 6 mph to 9 mph) occur in November.

Approach to Analysis

Tall buildings and exposed structures can strongly affect the wind environment for pedestrians. A building that stands alone or is much taller than the surrounding buildings can intercept winds that might otherwise flow overhead and redirect them down the vertical face of the building to the ground level. This may result in accelerated wind speeds and turbulence (variability in wind speed and pressure) which can affect pedestrians.

Planning Code Section 148, Reduction of Ground level Wind Currents in C-3 districts, requires buildings to be shaped so as not to cause ground level wind currents to exceed, more than 10 percent of the time, the pedestrian comfort criteria of 11 mph in substantial pedestrian use areas, and 7 mph in public seating areas. Similarly, the planning code requires that buildings not cause equivalent wind speeds to reach or exceed the hazard level of 26 mph for a single full hour of the year.[70] With respect to wind hazards, Section 148 states

[69] RDWI. 545 Sansome Street, Pedestrian Wind Study. July 20, 2023.

[70] The wind hazard criterion of 26 mph is derived from a wind condition that would generate a 3-second gust of wind at 20 meters per second (45 mph), a commonly used guideline for wind safety. This wind speed, on an hourly basis, is 26 mph averaged for a full hour. However, because the Civic Center Federal Building wind date collected at 1-minute averages, the 26-mph 1-hour average wind speed is converted to a corresponding 1-minute average wind speed at 36 mph, which is then used to determine compliance with the planning code hazard criterion. (Arens, E. et al., "Developing the San Francisco Wind Ordinance and its Guidelines for Compliance,

that new buildings and additions may not cause wind speeds that meet or exceed the hazard criterion and no exception may be granted for buildings that result in winds that meet or exceed the hazard criterion.

For the purposes of CEQA review, the Planning Department has determined that the pedestrian wind hazard criterion set forth in the San Francisco Planning Code is the standard for determining whether pedestrian winds would "substantially affect public areas" and therefore result in a significant impact. Therefore, the CEQA significance criterion for wind is whether a project would meet or exceed the wind hazard speed (36 mph, 1-minute average) for a single hour of the year. If the wind hazard criterion is exceeded under existing conditions, a significant impact would typically result if the number of locations where exceedances would occur would increase.

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

The project site is located on the northern boundary of the Downtown San Francisco area, and is relatively level with a ground surface elevation of between 3.7 and 5.7 feet above mean sea level.[71] The closest tall buildings include the Transamerica Pyramid, an approximately 850-foot-tall, 48-story, building located adjacent to the west side of the project site at 600 Montgomery Street; an approximately 245-foot-tall, 20-story office building adjacent to the southern project boundary at 505 Sansome Street; and an approximately 225-foot-tall, 15-story, US Appraisers' Building located northeast of the project site, across the Washington Street and Sansome Street intersection at 630 Sansome Street. Other nearby buildings include an approximately 110-foot-tall, 8-story, office building located southeast of the project site at 500 Sansome Street, and an approximately 85-foot-tall, 7-story office building at 423 Washington Street, east of the project site.

Existing wind conditions in the vicinity of the project site are moderately windy.[72] However, there were no exceedances to the wind hazard criterion speed of 36 mph (averaged over 1 minute) across all wind testing points under existing conditions.

Table 19: Pedestrian-Level Wind Impacts for the Proposed Project

Scenario	Wind Hazard (Criterion = 36 mph)			
	Average Speed (mph)	Average Speed (mph)	Total Hours	Total Exceedances
Existing	9	22	0	0/62
Existing Plus Proposed Project	9	21	0	0/62
Source: RWDI 2023.				

"Building and Environment, Vol 24, No. 4, pp. 297-303, 1989.) That is when stated on the same basis as the comfort criteria winds, the hazard criterion speed is a 1-minute average of 36 mph. Accordingly, all hazard wind speeds in the analysis are presented based on the 36-mph wind speed averaged over 1 minute, and the hazard criterion is based on 36 mph. Therefore, the wind test results are comparable between the comfort and hazard analyses.

71 Langan Engineering and Environmental Services (Langan). 2022. Preliminary Geotechnical Evaluation, 545 Sansome Street. 15 April .

72 RDWI. 2023. 545 Sansome Street, Pedestrian Wind Study – Preliminary Results. May 12.

The proposed project would extend the existing building's height on 545 Sansome Street from approximately 105 feet to approximately 198 feet, excluding the mechanical parapet structures. As stated in Table 3, with implementation of the proposed project, the number and location of test points at which wind speeds would exceed the hazard criterion would remain unchanged and there would be zero total exceedances. Therefore, the proposed project would not result in wind hazards in publicly accessible areas of substantial pedestrian use when compared to existing conditions, and this impact would be less than significant.

Impact C-WI-1: The proposed project, in combination with cumulative projects, would not alter wind in a manner that substantially affects public areas. ***(Less than Significant Impact)***

In addition to an analysis of Existing Plus Project wind conditions, the project wind study also conducted a cumulative conditions analysis. Cumulative projects within 1,200 feet of the project site constructing new buildings were included in the analysis, as they could have the potential to combine with the proposed project to result in cumulative wind impacts. Two cumulative projects were identified: 530 Sansome Street and 17 Osgood Place. The 530 Sansome Street project would be approximately 218 feet tall and located on the east side of Sansome Street.

Given that winds in this region are predominant from the westerly directions, the presence of 530 Sansome Street project is not expected to cause adverse impacts on the wind conditions near the proposed building at 545 Sansome Street. The 17 Osgood Place project would be 34-feet tall and located far enough to the north of the proposed project site to have any notable influence on the wind conditions around 545 Sansome Street project. As a result, it is our expectation that the addition of cumulative developments in the surrounding areas would not alter the wind environment around the proposed project site. The wind comfort and hazard conditions are predicted to be similar to those found in the Existing Plus Project configuration. Wind tunnel testing for the Project Plus Cumulative configuration was also conducted, for informational purposes.

Therefore, the proposed project in combination with other cumulative projects would not result in a significant cumulative wind impact. This impact would be less than significant.

E.10 Shadow

Topics:	*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*	*Not Applicable*
E.10 SHADOW					
Would the project:					
a) Create new shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces?	☐	☐	☒	☐	☐

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

The following analysis is based, in part, on a Shadow Study prepared by Fastcast for the proposed project in September 2023.

While the proposed project has the potential to affect Portsmouth Square, Sue Bierman Park, Edwin and Anita Lee Newcomer School playground, and Sydney G. Walton Square, all were determined to have no potential project shadow impacts due to intervening existing shadow during the times when potential impacts were measured. Therefore, no additional analysis was required for these sites. The two sites that could be affected by the proposed project include Maritime Plaza and Transamerica Redwood Park, described below.

Maritime Plaza. Construction of the proposed project is anticipated to add shadow onto Maritime Plaza, a publicly accessible, passive, and transitory open space under the jurisdiction of the San Francisco Recreation and Parks Department (SFRPD) and subject to review under Section 295 of the Planning Code. Maritime Plaza is a 1.99-acre (86,676-square-foot) urban plaza located in the Financial District of San Francisco approximately 400 feet east of the project site. Based on its size, Maritime Plaza has 322,556,066 square foot hours (sfh) of theoretically available annual sunlight (TAAS).[73] However, in the existing condition, the park is substantially shaded throughout the day by the tall buildings within and surrounding the park. The existing shadow load is 67.9 percent of the TAAS. The majority of the available sunlight covering the plaza occurs during the midday hours in the spring, summer, and early fall. The plaza is mostly in shadow throughout the day during late fall and winter. There are two existing buildings, the Alcoa Buildings, within the two blocks occupied by Maritime Plaza. These buildings and surrounding buildings cast shadow on Maritime Plaza.

The Shadow Study found that the proposed project would add 111,159-square-foot hours[74] of net new shadow on Maritime Plaza, or approximately 0.0345 percent of the TAAS; this would raise the shadow load on Maritime Plaza from 67.88 percent in the existing condition to 67.91 percent with the proposed project. As shown in Figure 4 of the Shadow Study, new shadow from the project would occur within the southwestern half of Maritime Plaza along the Battery Street side walkways and raised planting installations. Shadow would also occur in the western side of the plaza's center courtyard near the western entrance to the Alcoa building. This new shadow would primarily occur in the spring and would be cast in the late afternoon, starting at approximately 4:30 p.m. and increasing in area as the sun descends and shadows grow longer.

Because active or transitory activities are less sensitive to the availability of sunlight than passive uses, such as reading or napping, shadow occurring in the afternoon in spring and summer after 4:30 p.m. is not likely to affect the majority of park users. During most affected times, there would be other seating areas of the

[73] Theoretically Available Annual Sunlight (TAAS) is calculated by multiplying the square footage of the park (86,676 square feet) by 3,741.7 hours (the number of hours per year protected under Prop K) and is measured in square foot hours, which is one hour of sunlight on one square foot of the park.

[74] Square-foot-hours are defined as "the unit of measure in analysis of shadows. A square-foot-hour of sunshine means that a square foot of space in a park is in sunshine for 1 hour. The total square-foot-hours of a park are determined by multiplying the size of the park in square feet by 3,721, which is the total number of hours year-round between one hours after sunrise and 1 hour before sunset."

park that would be unshaded where, assuming sunlight is desirable for the park user, park users would be able to sit or lie down in sunlight instead of the areas receiving net new shadow from the proposed project. Therefore, the project would result in a less than significant shadow impact on Maritime Plaza.

Transamerica Redwood Park. The proposed project would also add shadow to Transamerica Redwood Park, an approximately 1.25-acre (55,880 square feet) passive-use POPOS located adjacent to the project site. Redwood Park is surrounded by tall buildings, including the adjacent Transamerica Pyramid and the existing building at 545 Sansome Street, and a dense redwood grove occupies most of the park. As such, the park is substantially shaded throughout the day in the existing condition. The majority of sunlight is available during the late morning and midday hours, primarily in the spring and summer months.

The proposed project would incrementally increase the amount of shadow on Redwood Park by 1.21 percent between approximately 10:30 a.m. and 1:00 p.m. from late March to mid-September. As shown in Figure 4 of the Shadow Study, new shadow from the proposed project would be limited to the northern tip of the park near the Washington Street park entrance. This area is populated with a handful of fixed wooden benches nestled under several tall redwood trees and currently has access to limited filtered sun. Additionally, as previously described, Redwood Park is already substantially shaded throughout the day in the existing condition. As such, the incremental new shadow generated by the proposed project would result in a less than significant impact on Redwood Park.

For these reasons, there would be a less than significant impact on shadow of publicly accessible spaces as a result of implementation of the proposed project.

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

Under cumulative conditions, the only cumulative project that would cast shadow on Maritime Plaza in combination with the proposed project is the 530 Sansome Street project, which is located directly east of the project site in between the project site and Maritime Plaza. 530 Sansome Street is proposed to be 17 stories tall and 236 feet high, which is approximately 23 feet taller than the proposed project. With 530 Sansome Street, the average daily net new shadow duration on Maritime Plaza would increase from approximately 49 minutes to 2 hours and 31 minutes on the affected days and raising the number of potentially affected days from 138 to 223, annually. The largest area of shading would also increase from approximately 5.2 percent with the proposed project to 14.5 percent of the overall plaza area with the addition of 530 Sansome Street. Cumulative shadows would be limited to the late afternoon hours and would peak during the summer. Cumulative shadows would begin in the late afternoon, reaching the western portion of Maritime Plaza after 4:30 p.m., and expanding eastward across the western half of the plaza, affecting landscaped and grassy areas as well as walkways over the course of approximately 2.5 hours until the end of the daily analysis period. Cumulative projects (i.e., 530 Sansome Street) would increase the shadow load by 0.7061 percent (2,277,204 square foot hours) and result in 32.09 percent (103,490,123 square foot hours) of remaining daylight. Overall, because the majority of park usage is transitory in nature and because there would be other unshaded areas of the park during the most affected times, there would still be adequate sunlight on Maritime Plaza. Therefore, cumulative impacts related to shadow would be less than significant.

For informational purposes, if 530 Sansome Street is built prior to 545 Sansome Street (i.e., the proposed project), the proposed project's potential shadow impact on Maritime Plaza would be significantly reduced because 530 Sansome Street is located between 545 Sansome Street and Maritime Plaza, is taller, and would therefore contribute the largest portion of the potential shadows on Maritime Plaza in the same areas and during the same times. In the event where 530 Sansome Street is built prior to 545 Sansome Street, the proposed project's net new shadow impact would be reduced from approximately 0.0345 percent of the TAAS to 0.001 percent of annual available sunlight. Shadow from the proposed 545 Sansome project would be isolated to a small area of the grass adjacent to the sculpture on the southwestern side of the center plaza.

The cumulative shadows on Transamerica Redwood Park would increase marginally to approximately 1.2 percent of TAAS over existing conditions, exclusively due to shading from the 530 Sansome Street project. The largest net new shadow under cumulative conditions would also occur on the summer solstice at 11:00 a.m., with new shade covering approximately 6.4 percent of the park's available sunlight at the time. However, the seating area is adjacent to tall redwood trees that currently shade this area throughout the year. Therefore, net new shadow resulting from the project combined with cumulative projects would likely not be noticeable given the amount of existing shadow from the large redwood trees adjacent to the seating area, and thus would not substantially or adversely affect the use and enjoyment of this park.

Because most users of Maritime Plaza and Transamerica Redwood Park that could be affected by net new cumulative shadow would be passing through the park or and would be unaffected by new shadow and, given the remaining availability of areas for reading and napping that would remain in sunlight, the cumulative impact from the proposed project shadow in combination with reasonably foreseeable projects, would not result in a significant cumulative shadow impact. Therefore, cumulative impacts related to shadow would be less than significant.

E.11 Recreation

Topics:	*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*	*Not Applicable*
E.11 RECREATION					
Would the project:					
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	☐	☐	☒	☐	☐
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☒	☐	☐

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

The project site is located in a densely developed urban area that contains a number of small neighborhood parks, open spaces, and other recreational facilities. The following parks, open spaces, and recreation facilities are located within an approximate 0.3-mile radius of the project site:

- Transamerica Redwood Park (adjacent to the western boundary of the project site).
- Maritime Plaza (approximately 0.09 mile east of the project site).
- Empire Park (approximately 0.14 mile southwest of the project site).
- Sydney G. Walton Square (approximately 0.17 mile northeast of the project site).
- Portsmouth Square Plaza (approximately 0.18 mile west of the project site).
- Ferry Park (approximately 0.21 mile east of the project site).
- Sue Bierman Park (approximately 0.28 mile east of the project site).
- St. Mary's Square (approximately 0.28 mile southwest of the project site).
- Mechanics Monument Plaza (approximately 0.31 mile southeast of the project site).
- Willie “Woo Woo” Wong Playground (approximately 0.32 mile southwest of the project site).
- One Bush Plaza (approximately 0.32 mile south of the project site).

The proposed office uses would add approximately 228 new office and retail employees to the project site, and the proposed POPOS and retail uses would attract additional users to the project site. These new users are anticipated to use parks in the surrounding vicinity as described above.

The proposed project includes a 1,250-square-foot POPOS that would connect to the existing Transamerica Redwood Park. Additionally, the proposed project would also construct 21,361 square feet of private open space, including 1,860 square feet of private open space on the ground floor for outdoor restaurant/retail use. These open spaces would partially offset the demand for open space generated by visitors and employees. With the availability of open space on and near the project site, the proposed project’s recreational demand would be adequately accommodated by existing and proposed recreational facilities.

As a result, the anticipated use of recreational resources nearby would also not be expected to substantially increase or accelerate the physical deterioration or degradation of existing recreational resources, and the proposed project would not result in the need to provide new or expanded parks or recreational facilities. Therefore, the proposed project would have a less than significant impact to recreational resources, and no mitigation is necessary.

Impact C-RE-1: **The proposed project, in combination with cumulative projects in the vicinity of the project site, would not result in significant cumulative impact on recreational facilities.** ***(Less than Significant Impact)***

The geographic context for evaluating impacts to recreational facilities includes cumulative development projects located within an approximately 0.25-mile radius of the project site as listed under Section B in *Cumulative Context*. The cumulative projects at 425 Broadway, 17 Osgood Place, 749 Grant Avenue, 530 Sansome Street, and 220 Battery Street would consist of residential development, and would result

cumulatively increase the demand for recreational resources in the area and the entire City. The City has accounted for such growth in the Recreation and Open Space Element and Housing Element of the General Plan.[75] As discussed above, the proposed project would provide 1,250 square feet of POPOS, which would contribute to the overall amount of public open space in the project vicinity. Thus, the proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on recreational resources. Impacts would be less than significant, and no mitigation is necessary.

E.12 Utilities and Service Systems

Topics:	*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*	*Not Applicable*
E.12 UTILITIES AND SERVICE SYSTEMS					
Would the project:					
a) Require or result in the relocation or construction of new or expanded, water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐	☐
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒	☐

The project site area is currently served by existing utility service systems, including water, wastewater and stormwater collection and treatment, solid waste collection and disposal, electric power, natural gas, and telecommunications facilities.

[75] San Francisco Planning Department. 2014. Recreation and Open Space Element, San Francisco General Plan. April.

The proposed project would increase the daytime and nighttime population of the project site in the form of office, retail, and restaurant patrons and employees. This increase in nonresidential population would increase the demand for utilities and service systems on the project site.

Impact UT-1: **The proposed project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board, would not exceed the capacity of the wastewater treatment provider serving the project site, or require construction of new stormwater drainage facilities, wastewater treatment facilities, or electric power, natural gas, or telecommunications facilities or expansion of existing facilities.** ***(Less than Significant Impact)***

The project site is currently developed with existing buildings. The project site is served by San Francisco's combined sewer system, which handles both sewage and stormwater runoff. The Southeast Water Pollution Control Plant provides wastewater and stormwater treatment and management for east side of the City, including the project site.[76] The San Francisco Public Utilities Commission (SFPUC) provides and operates water supply and wastewater/stormwater collection and treatment facilities for the City. Pacific Gas and Electric Company (PG&E) provides electricity and natural gas to the project site, and various private companies provide telecommunications facilities.

The proposed project would increase the daytime and nighttime population of the project site in the form of office, retail, and restaurant patrons and employees, which would incrementally increase wastewater flows the project site.

The project site is within a designated recycled water use area. Development projects within the recycled water use area that include over 40,000 square feet of new construction are required to comply with the San Francisco Recycled Water Ordinance by installing recycled water systems for all applicable uses, including toilets and irrigation.[77] The proposed project would have a net new square footage of 49,977 square feet of office uses and 2,979 square feet of retail uses, resulting in a proposed building of 105,224 gross square feet. The proposed project would therefore be subject to the requirements outlined in the Recycled Water Ordinance. The proposed project would be compliant by installing recycled water systems for all applicable uses, including toilets and irrigation. The proposed project would also comply with Title 24 of the California Code of Regulations and the San Francisco Green Building Ordinance by incorporating water-efficient fixtures. Compliance with these regulations would reduce wastewater flows and the amount of potable water used for building functions. The SFPUC infrastructure capacity plans account for projected population and employment growth. The incorporation of water-efficient fixtures into new development is also accounted for by the SFPUC because widespread adoption can lead to more efficient use of existing capacity. For these reasons, the proposed project would not require the construction of new or an expansion of existing wastewater treatment facilities.

The project site is currently fully covered with impervious surfaces. Therefore, the proposed project would not create net new impervious surfaces on the site. The proposed project would also potentially reduce the amount of impervious surfaces on-site with the construction of the POPOS and ground level private open space. The proposed project would be required to comply with the San Francisco Stormwater Management Ordinance (Public Works Code, Article 4.2 §§ 147-147.6) and the 2016 Stormwater Management

[76] San Francisco Public Utilities Commission (SFPUC). 2010. San Francisco Sewer System Master Plan Final Draft. May.

[77] San Francisco Public Utilities Commission (SFPUC). 2022. Recycled Water Installation Procedures for Developers. July.

Requirements and Design Guidelines, which would require the project to reduce or eliminate the existing volume and rate of stormwater runoff discharged from the project site.[78,79] As the project site is covered by more than 50 percent in impervious surfaces, some of which would be replaced by pervious surfaces as part of project design (e.g., landscaping), and because the project site is currently served by the combined sewer system, the proposed project would be required to include a stormwater management approach that would reduce the existing runoff flow rate and volume for a 2-year 24-hour design storm by 25 percent.

To achieve compliance with the Stormwater Management Requirements and Design Guidelines, the proposed project would be required to implement and install appropriate stormwater management systems that retain runoff on-site, promote stormwater reuse, and limit site discharges from entering the City's combined stormwater/sewer system. This, in turn, would limit the incremental demand on both the collection system and wastewater facilities resulting from stormwater discharges and would minimize the potential for constructing new or expanding existing stormwater drainage facilities. A stormwater control plan, required per the City's Stormwater Management Ordinance (Ordinance No. 64-16), would be designed for review and approval by the SFPUC because the proposed project would result in ground disturbance of an area greater than 5,000 square feet. The stormwater control plan would also include a maintenance agreement, signed by the project sponsor, to ensure proper care of the necessary stormwater controls. Therefore, the proposed project would not substantially increase the amount of stormwater runoff to the extent that existing facilities would need to be expanded or new facilities would need to be constructed. The proposed project would have a less than significant impact on stormwater infrastructure.

The proposed project would result in an incremental increase in the demand for electricity, natural gas, and telecommunications. However, the increase would be modest, and would not exceed demand expected and provided for in the project area by utility service providers. The proposed project would also result in an incremental increase in the demand for water supply, but this demand would not result in the need for the construction of new or expanded water treatment facilities or delivery infrastructure.

For these reasons, the utilities demand associated with the proposed project would not exceed the service capacity of the existing providers and would not require the construction or expansion of utilities services facilities. Therefore, the proposed project would have a less than significant impact, and no mitigation measures are necessary.

Impact UT-2: There would be sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years under current water management plans. ***(Less than Significant Impact)***

The SFPUC's Urban Water Management Plan (UWMP) for the City and County of San Francisco, adopted in 2021, estimates the current and projected water supplies and their sufficiency in reaching future retail demand through 2045 under normal year, single dry-year and multiple dry-year conditions.[80]

If the Bay-Delta Plan Amendment is implemented, the SFPUC may develop new or expanded water supply facilities to address shortfalls in single and multiple dry years. This would occur regardless of the

[78] City and County of San Francisco. 2016. Public Works Code Ordinance No 64-16, Stormwater Management Requirements. April.

[79] San Francisco Public Utilities Commission (SFPUC) and Port of San Francisco. 2016. Stormwater Management Requirements and Design Guidelines. May.

[80] San Francisco Public Utilities Commission. 2021. 2020 Urban Water Management Plan for the City and County of San Francisco. June.

construction of the proposed project and impacts from such water supply facilities expansions and constructions cannot be identified at this time. The SFPUC would also address supply shortfalls through increased rationing, which could result in significant cumulative effects, but the proposed project would not make a considerable contribution to impacts from increased rationing.

The UWMP also assesses the future water supply of the City with the inclusion of the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary, which establishes water quality objectives to maintain the health of our rivers and the Bay-Delta ecosystem (the Bay-Delta Plan Amendment).[81] The UWMP forecasts two projections of water supply: one without the Bay-Delta Plan Amendment, and one with the Bay-Delta Plan Amendment coming into effect in 2023. According to the UWMP, the SFPUC is expected to have adequate water supply, approximately 265 million gallons per day (mgd), to meet total retail demands through 2045 in normal years, regardless of Bay-Delta Plan Amendment implementation.[82]

Adoption of the Bay-Delta Plan Amendment would result in an estimated 14 to 25 percent shortfall in retail water supply in expected single dry-year events, and an expected 30 to 49 percent shortfall in retail water supply in expected multiple dry-year events, depending on demand levels.[83] In the event of shortages in retail water supply, the SFPUC would allocate water and apply policies according to the Retail Water Shortage Allocation Plan, which include various voluntary and mandatory retail costumer reductions in water usage, from at least a 5 percent water usage reduction to a minimum 32 percent water usage reduction during droughts, as shown in Table 4.[84] The UWMP's expected shortfalls with the Bay-Delta Plan Amendment would occur regardless of the proposed project's implementation, and the proposed project would comply with all applicable regulations provided by the UWMP, Retail Water Shortage Allocation Plan, and the San Francisco Planning Code.

Without the implementation of the Bay-Delta Plan Amendment, the SFPUC expects to have adequate water supply to expected retail water demand in all normal years and single dry years.[85] A shortfall of 10 percent would be expected in years four and five of a multiple dry-year event at 2045 levels of demand. Such a shortfall would result in implementation of measures outlined in the Retail Water Shortage Allocation Plan and would include an expected voluntary retail water use reduction of 5 percent. The proposed project would comply with all applicable regulations.

Sections 10910 through 10915 of the California Water Code state that urban water suppliers, like the SFPUC, must prepare Water Supply Assessments (WSAs) for certain large "water demand" projects, as defined in CEQA Guidelines Section 15155. The proposed project would not employ more than 1,000 persons and would not have more than 250,000 square feet of office or commercial floor space; therefore, it would not meet the CEQA definition for large water demand projects, and a WSA is not required.

While a WSA is not required, the following discussion provides an estimate of the proposed project's maximum water demand in relation to the UWMP's provided scenarios of water supply with Bay-Delta Plan Amendment implementation in 2023, and water supply without Bay-Delta Plan Amendment

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81 Ibid.

82 Ibid.

83 Ibid.

84 San Francisco Public Utilities Commission. 2021. 2020 Urban Water Management Plan for the City and County of San Francisco. June.

85 Ibid.

implementation. No single development project alone in San Francisco would require the development of new or expanded water supply facilities or require the SFPUC to take other actions, such as imposing a higher level of rationing across the City in the event of a supply shortage in dry years. As such, a project-specific analysis is not provided for this topic. Instead, this analysis considers the SFPUC's ability to provide adequate water supply facilities given the proposed project's impacts in combination with existing development and projected growth through 2045. Significant cumulative impacts on the environment could include the construction, expansion, or relocation of water supply facilities, and a high level of water rationing. It is only under this cumulative context that development in San Francisco could have the potential to require new or expanded water supply facilities or require the SFPUC to take other actions, which in turn could result in significant physical environmental impacts related to water supply. If significant cumulative impacts could result, then the analysis considers whether the proposed project would make a considerable contribution to the cumulative impact.

The SFPUC has, based on a Citywide demand analysis and guidance from the California Department of Water Resources, determined that a 50,000 gallons per day (gpd) as an equivalent project demand for projects that do not meet the definitions provided in CEQA Guidelines Section 15155(a)(1).[86] The proposed project would develop a commercial building with office and ground level retail spaces. As mentioned in Section E.3 Population and Housing, under Impact PH-1, the proposed project would generate approximately 228 employees. Total proposed project office space (105,224 square feet) and retail space (6,410 square feet) would represent approximately 44 percent of the 250,000 square feet of commercial space threshold in Section 15155(a)(1)(C). In addition, the proposed project would incorporate water-efficient fixtures as required by Title 24 of the California Code of Regulations and the City's Green Building Ordinance. Based on the UWMP, gross retail demand for water in 2020 was recorded at 76 gallons per capita per day (GPCD), reducing to a projected gross retail demand of 64 GPCD in 2045.[87] Therefore, at 228 expected employees, the maximum expected water demand from the proposed project would be approximately 17,328 gpd in 2020, and 14,592 gpd in 2045. It is therefore reasonable to assume that the proposed project would result in an average daily demand of less than 50,000 gallons per day of water.

The SFPUC UWMP provides estimates of total retail demand from 2020 to 2045. Assuming the proposed project would demand no more than 50,000 gallons of water per day (or 0.05 million gallons per day), the maximum demand would represent a small fraction of the total projected retail water demand, ranging from 0.6 percent to 0.7 percent between 2020 and 2045.[88] As such, the project's water demand is not substantial enough to require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects.

If the Bay-Delta Plan Amendment is not implemented, the proposed project and other reasonably foreseeable future development would receive sufficient water supplies from the SFPUC during normal, dry, and multiple dry years, with the exception of years four and five of a multiple-year drought in 2045, where a shortfall of 10 percent would be expected.[89] To address future potential shortfalls, the SFPUC has active water supply development projects, including the Daly City Recycled Water Expansion project, which has

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86 San Francisco Public Utilities Commission (SFPUC). 2013. Water Code Section 10912(a)(7) "Equivalent" Project Threshold Memorandum. March 8.

87 San Francisco Public Utilities Commission (SFPUC). 2021. 2020 Urban Water Management Plan for the City and County of San Francisco. June.

88 Ibid.

89 Ibid.

been approved by the Daly City government. The SFPUC has also identified other possible projects that it will study, but it has not determined the feasibility of the possible projects, has not made any decision to pursue any particular supply projects, and has determined that the identified potential projects would take anywhere from 10 to 30 years or more to implement.[90] The potential impacts that could result from the construction and/or operation of any such water supply facility projects cannot be identified at this time. In addition, the 10 percent potential shortfall in years four and five of a multiple-year drought in 2045 would occur regardless of the proposed project's development, and the proposed project would only represent a small fraction of the total projected retail water demand, as mentioned above. Therefore, in a scenario where the Bay-Delta Plan is not enacted in the near future, the proposed project would result in a less than significant impact on water supplies.

Implementation of the Bay-Delta Plan Amendment would result in a retail supply shortfall of up to 49 percent in a multi-year drought.[91] As indicated above, the proposed project would represent less than 0.07 percent of the total retail demand in 2045. The SFPUC has indicated that it is accelerating its efforts to develop additional water supplies and explore other projects that would increase overall water supply resilience if the Bay-Delta Plan Amendment is implemented.[92] These active and potential projects have been noted above. The potential impacts that could result from the construction and/or operation of any such water supply facility projects cannot be identified at this time. In any event, under such a worst-case scenario, the demand for the SFPUC to develop new or expanded dry-year water supplies would exist regardless of whether or not the proposed project is constructed.

While the California State Water Resources Control Board (State Water Board) has stated that it intended to implement the Bay-Delta Plan Amendment by 2022, the SFPUC estimates that implementation would likely occur in 2023 given current uncertainties surrounding the Bay-Delta Plan Amendment's implementation process. Given the long lead times associated with developing additional water supplies, the expected action of the SFPUC in the event of dry-year shortfalls for the next 10 to 30 years (or more) would be limited to requiring increased rationing through its Retail Water Shortage Allocation Plan. The level of rationing that would be required of the proposed project is unknown at this time. Both direct and indirect environmental impacts could result from high levels of rationing. However, the small increase in potable water demand attributable to the project compared to citywide demand would not substantially affect the levels of dry-year rationing that would otherwise be required throughout the city.

Therefore, the proposed project would not make a considerable contribution to a cumulative environmental impact with or without implementation of the Bay-Delta Plan Amendment. This impact would be less than significant, and no mitigation measures would be necessary.

Impact UT-3: **The proposed project would be served by a landfill with adequate permitted capacity to accommodate the project's solid waste disposal needs and comply with all applicable statutes and regulations related to solid waste.** ***(Less than Significant Impact)***

The project site is currently served by the City's landfill disposal site, the Recology Hay Road Landfill in Solano County, which will serve San Francisco through September 2024 or until 3.4 million tons have been

90 Ibid.
91 Ibid.
92 Ibid.

disposed of, whichever occurs first.[93] The City would have an option to renew the agreement for a period of 6 years or until an additional 1.6 million tons have been disposed of, whichever occurs first. The Recology Hay Road Landfill is permitted to accept up to 2,400 tons per day of solid waste. At that maximum permitted rate, the landfill has the capacity to accommodate solid waste until approximately 2034. Under existing conditions, the landfill receives an average of approximately 1,850 tons per day from all sources, with approximately 1,200 tons per day from the City of San Francisco, which includes residential and commercial waste and demolition and construction debris that cannot be reused or recycled.[94] At the current rate of disposal, the landfill closure has operating capacity until 2041. The City's contract with the Recology Hay Road Landfill will extend until 2031 or when the City has disposed of 5 million tons of solid waste, whichever occurs first. At that point, the City would either further extend the landfill contract or find and entitle an alternative landfill site.

The proposed project would also be required to implement the City's Mandatory Recycling and Composting Ordinance (Ordinance No. 100-09), which aims to minimize the City's landfill trash generation. In compliance with this ordinance, the proposed project would be required to provide convenient facilities for the separation of recyclables, compostable materials, and landfill trash for its users. Occupants of the project site would be required to separate disposed material.

Construction of the proposed project would generate demolition and construction waste. The City's Construction and Demolition Debris Recovery Law, which includes Ordinance No. 144-21, and Public Works Code Section 725 require that construction and demolition debris material removed from the proposed project would have to be recycled or reused.[95] No construction or demolition debris would be permitted to be transported or disposed of in a landfill or incinerator or put in a designated trash bin. Mixed debris would be mandatorily transported with permit-registered transporters or transport boxes. Source separated material would be required to be taken to a facility that recycles or reuses those materials.[96]

As discussed above, the City has access to adequate landfill capacity at least through 2031 and potentially through 2041 and anticipates that an adequate alternative site will be identified at that point. On this basis, the City has adequate solid waste capacity to serve the proposed project, and the impact with respect to landfill capacity would be less than significant, and no mitigation measures are required.

Impact UT-4: Construction and operation of the proposed project would follow all applicable statutes and regulations related to solid waste. ***(No Impact)***

Reports filed by the San Francisco Department of the Environment under the California Integrated Waste Management Act (AB 939) show that the City generated approximately 870,000 tons of waste material in 2000. By 2010, that figure decreased to approximately 455,000 tons. Waste diverted from landfills is defined as recycled or composted. San Francisco exceeded its goal of 75 percent landfill diversion, and thus updated

93 City and County of San Francisco. 2015. Landfill Disposal Agreement between the City and County of San Francisco and Recology San Francisco. July.

94 San Francisco Planning Department. 2015. Agreement for Disposal of San Francisco Municipal Solid Waste at Recology Hay Road Landfill in Solano County, Final Negative Declaration, Planning Department Case No. 2014.0653. March 4.

95 San Francisco Department of the Environment. 2022. Construction and Demolition Debris Recovery Law. Website: https://sfenvironment.org/construction-demolition-requirements. Accessed July 25, 2023.

96 Ibid.

its zero waste goals to: reducing municipal solid waste generation by 15 percent by 2030 and reducing disposal to landfill and incineration by 50 percent by 2030.[97]

San Francisco's Construction and Demolition Debris Recovery Ordinance (Ordinance No. 144-21) requires a minimum of 75 percent of all construction and demolition debris to be recycled and diverted from landfills. Furthermore, San Francisco Ordinance No. 100-09 (the Mandatory Recycling and Composting Ordinance) requires everyone in San Francisco to separate their solid waste into recyclables, compostable materials, and trash. The proposed project would be subject to and would comply with San Francisco Ordinance No. 144-21, San Francisco Ordinance No. 100-09, and all other applicable statutes and regulations related to solid waste. Accordingly, the proposed project would be required to follow State and federal regulations related to the disposal of hazardous wastes, and hazardous wastes would be transported to a permitted disposal or recycling facility. The proposed project would comply with all applicable local, State, and federal laws and regulations pertaining to solid waste, and there would be no impact.

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

Implementation of the proposed project, in combination with cumulative development, would result in an incremental increase in daytime population, water consumption, and wastewater and solid waste generation. The SFPUC has accounted for such growth in its water demand and wastewater service projections, and the City has implemented various programs to divert solid waste from landfills, such that existing landfill capacity is sufficient to meet the City's future development needs. For these reasons, the proposed project would not combine with cumulative projects in the project vicinity to create a significant cumulative impact on utilities and service systems and impacts would be less than significant.

E.13 Public Services

Topics:	*Potentially Significant Impact*	*Less than Significant Impact With Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*	*Not Applicable*
E.13 PUBLIC SERVICES					
Would the project:					
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services such as fire protection, police protection, schools, parks, or other public facilities?	☐	☐	☒	☐	☐

[97] San Francisco Department of the Environment. 2022. Zero Waste - Frequently Asked Questions (FAQs). Website: https://sfenvironment.org/zero-waste-faqs. Accessed July 25, 2023.

The proposed project's impacts on parks and open spaces are discussed in Section E.12, Recreation. Impacts on other public services are discussed in this section.

Impact PS-1: **The proposed project would not result in an increase in demand for police protection, fire protection, schools, or other services to an extent that would result in substantial adverse physical impacts associated with the construction or alteration of governmental facilities, the construction of which could result in significant environmental impacts.** ***(Less than Significant Impact)***

The City, including the project site, currently receives fire protection services and unified emergency medical services and transport, including basic life support and advanced life support services, from the San Francisco Fire Department. The project site is within the service area of the Fire Department's Battalion 1, and Fire Station 13 is located on the opposite frontage of Sansome Street at 530 Sansome Street. Other stations in Battalion 1 include Station 2 (1340 Powell Street at Broadway), Station 28 (1814 Stockton Street at Greenwich Street), and Station 41 (1325 Leavenworth Street at Jackson Street). Of these three, Station 2 is the next closest Fire Station, located approximately 0.45 mile northwest of the project site.

The proposed project would involve demolition and construction actions that may create temporary sidewalk and temporary partial street closures. However, all temporary lane closures would be subject to Fire Department approval and these closures would not interrupt Fire Department service in the Financial District neighborhood and the rest of the City. Fire access to the site and adjacent structures would be maintained at all times. If Fire Station 13 is operating during time of construction, the proposed project would restrict the usage of protection barricades during construction to existing sidewalks only to allow for sufficient emergency vehicle access on adjacent streets into and out of Fire Station 13. Furthermore, the proposed project would maintain Occupational Safety and Health Administration (OSHA)-compliant entrance and exit routes onto the project site during construction. Therefore, the existing levels of fire protection would be maintained during construction of the proposed project and impacts to fire protection during construction would be temporary and less than significant.

The proposed project would also be reviewed by the Fire Department and Department of Building Inspection to ensure that the proposed building would comply with the latest California Building Standards Code (CBC) requirements for fire and life safety measures as specified in the San Francisco Fire Code. These requirements include measures related to emergency access and egress; fire hydrants and sprinkler systems; fire-rated design, construction, and materials; restrictions on occupant loads; emergency lighting; smoke alarms; and mechanical smoke control and emergency notification systems. The proposed project would also work with the Fire Department to determine utility and access requirements for fire protection and emergency services at the project site. Adherence to San Francisco Fire Code requirements as part of the project design would minimize demand for future fire protection services.

The proposed project would be built in a fully developed area of San Francisco. Implementation of the proposed project would incrementally increase the intensity of use and service population beyond what currently exists on the project site and incrementally increase demand for public fire protection and emergency medical services in the project vicinity. However, the fire stations in the project vicinity, including

Fire Station 13, would provide sufficient fire protection services for the proposed project. Therefore, the impact of the proposed project on fire protection and emergency medical services in the project area would be less than significant, and no mitigation measures are necessary.

The project site is currently also served by the San Francisco Police Department (SFPD), services from which include responding to calls for police assistance, monitoring and managing traffic, and performing general surveillance duties. The project site is in the SFPD's Central District and is served by the SFPD Central Station on 766 Vallejo Street, approximately 0.49 mile from the project site.[98]

As mentioned above, implementation of the proposed project would incrementally increase the intensity of use and service population beyond what currently exists on the project site and marginally increase the demand for police services in the area. The increased demand from the proposed project would not be considered substantial given the ongoing bi-annual staffing analysis and dynamic resource deployment that occurs on a citywide basis. In compliance with City charter mandate, police department resources are regularly redeployed based on need in order to maintain charter-mandated staffing and acceptable service ratios.[99] Therefore, implementation of the proposed project would not require the construction of new or alteration of existing police facilities. This impact would be less than significant, and no mitigation measures are necessary.

Impact PS-2: **The proposed project would not substantially increase the demand for school services and would not require new or physically altered school facilities, the construction of which would result in significant environmental impacts.** ***(Less than Significant Impact)***

The proposed project would not include any residential units and, thus, would not directly contribute to school-aged children or the demand for school services. the project site.

The proposed project would not appreciably increase population Therefore, the proposed project would not substantially change the demand for schools and would not necessitate the need for new school facilities or the expansion of existing school facilities. The impacts would be less than significant, and no mitigation measures are necessary.

Impact PS-3: **The proposed project would not increase demand for other public services, but not to the extent that would require new or physically altered governmental facilities, the construction of which could result in significant environmental impacts.** ***(Less than Significant Impact)***

The project site is currently surrounded by the Chinatown Branch of the San Francisco Public Library is located at 1135 Powell Street, approximately 0.43 mile west of the project site, and the North Beach Branch is located at 850 Columbus Avenue, approximately 0.77 mile northwest of the project site.[100] The proposed project would not construct any residential units, and therefore demand for government services and facilities, such as public libraries, is not anticipated to be significant with proposed project implementation

98 San Francisco Police Department. 2022. SFPD Station Finder Interactive Map. Website: https://www.sanfranciscopolice.org/your-sfpd/sfpd-stations/station-finder. Accessed July 25, 2023.

99 San Francisco Police Department. 2022. Staffing Analysis of the San Francisco Police Department 2021. March.

100 San Francisco Public Library. 2022. Our Locations. Website: https://sfpl.org/locations/#!/filters?sort_by=weight&sort_order=ASC. Accessed July 25, 2023.

Therefore, impacts on library services and other governmental facilities would be less than significant, and no mitigation measures are necessary.

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

Cumulative development in the project vicinity would result in an intensification of land uses and a cumulative increase in the demand for fire protection, police protection, school services, and other public services. The fire and police departments, the school district, libraries, and other City agencies respond to growth and other changing service needs through ongoing analysis of applicable metrics, such as staffing, capacity, response times, and call volumes. As a result, projected future development would not result in any service gap in citywide police, fire, emergency medical services, and libraries. The proposed project would not alter the demands for school and library services and would therefore have no significant impact in combination with cumulative development on these services. Therefore, the proposed project would not combine with reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact on public services. This impact would be less than significant, and no mitigation measures are necessary.

E.14 Biological Resources

Topics:	*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*	*Not Applicable*
E.14 BIOLOGICAL RESOURCES **Would the project:**					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States 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 United States 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?	☐	☐	☒	☐	☐

Topics:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
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?	☐	☐	☐	☒	☐

Setting

The project site currently contains two structures, the existing 9-story building, located at 545 Sansome Street, and a neighboring single-story restaurant, located at 503 Washington Street. The entire project site is hardscaped, with no vegetation. The project includes a small, gated concrete courtyard on the western portion of the project site. There are no other relevant biological features on-site. The project vicinity is hardscaped and characterized by the 48-floor (853 feet) Transamerica Pyramid skyscraper and Transamerica Redwood Park to the immediate west. The building to the east includes San Francisco Fire Station 13. To the north and south of the project site there are various retail businesses at the ground level, and offices in the upper levels.

Biological resources within the City of San Francisco are diverse despite being 95 percent developed. The City contains dozens of natural ecological communities, harboring a diverse population of birds, mammals, reptiles, amphibians, and over 450 native plants.[101] San Francisco's biological resources exists among urban geography of parklands, natural areas, urban forests, community gardens and neighborhoods. Despite its urban development, San Francisco has significant areas of natural ecosystems including grasslands, wetlands, coastal scrub, dunes, woodlands, the San Francisco Bay, and the Ocean.[102] Existing biological resources on or near the proposed project site include trees planted along the surrounding sidewalk, and the adjacent Redwood Park. High levels of ambient noise, traffic, large hardscaped buildings, heavy pedestrian traffic, and light pollution from surrounding buildings are all sources of biological disturbance on or near the proposed site. Consequently, current wildlife residing on or near the project site are tolerant to current disturbances due to long-term exposure.

The adjacent Transamerica Redwood Park, which is a half-acre public park containing numerous redwood trees (*Sequoia sempervirens)* and a variety of plant species. The park, which was once part of the Barbary Coast waterfront, was filled and later occupied by the Montgomery Block building, which was demolished in 1959and replaced with 80 mature redwood trees brought in from the Santa Cruz Mountains. Fifty of the

[101] City of San Francisco. 2022. Nature and Biodiversity in San Francisco. Website: https://sfenvironment.org/biodiversity. Accessed July 25, 2023.

[102] City of San Francisco. 2022. Our Ecology. Website: https://sfenvironment.org/our-ecology/overview/our-ecology. Accessed July 25, 2023.

original trees remain, creating a shaded, vegetated space that is consistently maintained.[103] In addition to the redwoods, the park incorporates boulders, shrubs, and planting beds filled with ferns and flowering plants. It is paved with exposed-aggregate concrete pavers and enclosed by a tall steel fence. The space also features a sunken asymmetrical pool and fountain.

Impact BI-1: **The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service.** ***(Less than Significant Impact)***

Prior to the reconnaissance-level field survey, a literature review was conducted to identify potential biological resources that could be present on-site, including a search of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) and the California Native Plant Society (CNPS) Electronic Inventory (CNPSEI). Both search queries were focused within the *San Francisco North, California* United States Geological Survey (USGS) 7.5-minute Topographic Quadrangle map and seven surrounding quadrangles. The search queries determined that 31 special-status plant species and CNPS sensitive species have been recorded within vicinity of the project site.[104,105] Of these 31 plant species, it was determined that none are expected to occur within the project site due to absence of suitable habitat, previous land use, and ground disturbance on-site.

Of the federal and State-listed threatened and/or endangered wildlife species and State Species of Special Concern that have the potential to occur in the project area, all species but three—American peregrine falcon (*Falco peregrinus anatum*), pallid bat (*Antrozous pallidus*), and Townsend's big-eared bat (*Corynorhinus townsendii*)—were determined unlikely to occur due to lack of suitable habitat and/or lack of recorded occurrence in the project vicinity.

The vacant structure on-site contains marginally suitable habitat to support the pallid bat and Townsend's big-eared bat to establish roosts. CNDDB records indicate one pallid bat and two Townsend's big-eared bat occurrences within 10 miles of the project site.[106] Additionally, numerous ornamental redwood trees adjacent to the site and the on-site buildings could provide suitable nesting habitat for many bird species including peregrine falcon. CNDDB records indicate two peregrine occurrences within 10 miles of the project site.[107] However, a field survey was conducted on the project site and no signs of peregrine falcon, pallid bat, or Townsend's big-eared bat were observed.

[103] The Cultural Landscape Foundation – Transamerica Redwood Park. 2022. Website: https://www.tclf.org/landscapes/transamerica-redwood-park. Accessed July 25, 2023.

[104] California Department of Fish and Wildlife (CDFW). 2023. CNDDB RareFind 5 California Natural Diversity Database Query for Special-Status Species. Website: https://map.dfg.ca.gov/rarefind/view/RareFind.aspx. Accessed July 13, 2023.

[105] California Native Plant Society (CNPS). 2023. California Native Plant Society Rare and Endangered Plant Inventory. Website: http://www.rareplants.cnps.org/. Accessed July 13, 2023.

[106] California Department of Fish and Wildlife (CDFW). 2023. Biogeographic Information and Observation System (BIOS 6). Website: https://wildlife.ca.gov/Data/BIOS. Accessed July 13, 2023.

[107] Ibid.

Bird species are protected by the Migratory Bird Treaty Act and California Fish and Game Code sections 3503, 3503.5, and 3513.93. The proposed project would comply with these federal and State bird protection laws; thus, this impact would be less than significant and no mitigation measures are required.

Impact BI-2: **The proposed project would not 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 United States Fish and Wildlife Service.** ***(No Impact)***

The project site is fully developed and is composed entirely of impervious surfaces. There are no riparian, wetland communities, or other sensitive natural communities on-site or within disturbance distance. Therefore, no substantial adverse effects would occur, and there would be no impact.

Impact BI-3: **The proposed project would not 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.** ***(Less than Significant Impact)***

The proposed project site does not contain any wetlands nor is it adjacent to existing wetlands. There would be no substantial adverse effect on wetlands through direct removal, filling, or hydrological interruption. However, indirect impacts can occur such as the potential release of pollutants caused by project implementation through the stormwater system. During construction, activities such as grading, and demolition create pollutants that can leave the site and harm nearby waterways. Sediment is one of the main pollutants of concern. When it rains, stormwater washes over the loose soil on a construction site, along with various materials and products being stored outside. As stormwater flows over the site, it can pick up pollutants such as chemicals, debris, loose soil, sediment, and spilled fluids. These pollutants can be transported to nearby storm drains or directly into local creeks or larger bodies of water.[108] Potential waterbodies at risk for pollutants include San Francisco Bay located approximately 2,000 feet to the northeast of the project site.

To ensure water quality in nearby bodies of water, the applicant must comply with the applicable provisions of the Clean Water Act (CWA) and Porter-Cologne Water Quality Control Act, including stormwater control, and require that a discharge of any pollutant or combination of pollutants to surface waters be regulated by a National Pollutant Discharge Elimination System (NPDES) permit.[109] With compliance with applicable water quality laws and regulations, including the CWA and Porter-Cologne Water Quality Control Act, the potential impacts on protected wetlands or adjacent bodies of water would be less than significant.

Impact BI-4: **The proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native**

[108] West Valley Clean Water Authority. How Construction Contributes to Water Pollution. Website: https://www.cleancreeks.org/167/How-Construction-Contributes-to-Water-Po. Accessed July 25, 2023.

[109] California State Water Resources Control Board (State Water Board). November 2021. National Pollutant Discharge Elimination System (NPDES). Website: https://www.waterboards.ca.gov/water_issues/programs/npdes/drinkingwatersystems.html#:~:text=Section%20402%20of%20the%20Clean,Elimination%20System%20(NPDES)%20permit. Accessed July 25, 2023.

resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. *(Less than Significant Impact)*

Wildlife Nursery Sites

The project site is fully developed; however, building rooftops and adjacent redwood trees could support native nursery sites in form of nests of native birds. Project implementation, such as demolition and construction, could result in both direct and indirect disturbances, causing loss of eggs, altricial young, or discouraging nesting on or near the project site.

The MBTA and California Fish and Game Code prohibit activities that result in the loss of eggs or altricial young. In accordance with the MBTA and the California Fish and Game Code, the proposed project would be required to comply with federal and State bird protection laws. Compliance with existing regulations would ensure that impacts are reduced to a less than significant level.

Wildlife Movement

Migrating birds regularly pass-through San Francisco, which is situated along the Pacific Flyway, a migratory route that is used by numerous avian species.

The project applicant proposes to demolish the existing single-story retail building on-site and expand the existing nine-story, approximately 105-foot-tall building into a 15-story, approximately 214-foot-tall building, and create a new POPOS. The location, building height, and building materials, particularly transparent or reflective glass, may present risks for birds as they travel along their migratory paths. The likelihood of migratory bird collisions could increase because of the proposed façade, which would include a contemporary glass design. The reflection of trees in windows may attract birds utilizing Redwood Park, adjacent to the proposed project site, and such reflections are known to have the potential to result in fatal window collisions.[110] Lethal casualties rest from head trauma after birds leave a perch to reach habitat seen through or reflected in clear or tinted panes.[111]

Additionally, the installation of lighting on buildings and around roads, paths, and parking lots may result in potential impacts on animal species. Many animals, both special-status and common species, are sensitive to light cues. Special behavior of animals is influenced by luminance–the visibility and intensity of the surface brilliance of objects (such as lamps and lighted windows). Many articles report the attraction of birds to bright lights and brightly lit structures. Birds migrating at night, especially with an overcast sky, become disorientated.[112]

The City of San Francisco has adopted guidelines to address this issue and has regulations for bird-safe designs within the City. Planning Code Section 139, Standards for Bird-Safe Buildings, establishes building design standards to reduce avian mortality rates associated with bird strikes.[113] The building standards are

[110] Gelb, Yigal; Nicole Delacretaz. 2009. Windows and Vegetation: Primary Factors in Manhattan Bird Collisions. Website: https://www.jstor.org/stable/27744581. Accessed July 25, 2023.

[111] Klem, D. Jr., Christopher Farmer, Nicole Delacretaz, Yigal Gelb, Peter Saenger. 2009. Architectural and Landscape Risk Factors Associated with Bird-Glass Collisions in an Urban Environment. The Wilson Journal of Ornithology.

[112] Molenar, Sanders, Jonkers. 2013. Ecological Consequences of Artificial Night Lighting. https://books.google.com/books?id=dEEGtAtR1NcC&dq=de+Molenaar+et+al.+2006&lr=&source=gbs_navlinks_s. Accessed July 25, 2023.

[113] City of San Francisco. 2011. San Francisco Planning Department, Standards for Bird-Safe Buildings. July 14.

based on two types of hazards: (1) location-related hazards where the siting of a structure inside or within 300 feet of an Urban Bird Refuge (open spaces that are two acres and larger and dominated by vegetation or open water) creates an increased risk to birds, and (2) feature-related hazards, which may increase risks to birds regardless of where the structure is located. For new building construction where the location-related standard would apply, the façade requirements include no more than 10 percent untreated glazing and minimal lighting. Any lighting that is used must be shielded and prevented from resulting in any up lighting. Feature-related hazards include freestanding glass walls, wind barriers, skywalks, balconies, and greenhouses on rooftops that have unbroken glazed segments 24 square feet or larger in size. Any structure that contains these elements must treat 100 percent of the glazing. Bird-safe treatment of transparent or reflective surfaces and/or shading have the potential to reduce window collision risk significantly, because birds will be able to recognize glazed surfaces with bird-safe treatment as solid obstacles from far enough to avoid collision.[114, 115]

With implementation of the generally applicable Standards for Bird-Safe Buildings, potential significant impacts on migratory birds would be less than significant under CEQA, and no additional mitigation is required.

Impact BI-5: The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. (*Less than Significant Impact with Mitigation Incorporated)*

The removal of street trees or significant trees, as well as the planting of new street trees, is subject to the provisions of the San Francisco Urban Forestry Ordinance, which is codified as Chapter 12, Section 1204, Urban Forest Plan, of the San Francisco Public Works Code.[116]

The proposed project would comply with San Francisco Public Works Code, Section 1204, requirements for street trees associated with new developments by including four new red flowering gum *(Corymbia ficifolia)* trees on Washington Street, and four trees of the same species on Sansome Street. Implementation of the proposed project would also include an additional 1,250 square feet of POPOS to connect with the existing Redwood Park.

The project site contains trees and vegetation that would be removed as part of the proposed project. One existing street tree along Washington Street may need to be relocated as it appears to be planted too close to streetlight pole. In addition, directly adjacent redwoods within Redwood Park could be critically damaged if excavation occurs within their root zone, or if construction equipment damages tree trunks. However, all potentially impacted trees are subject to the San Francisco Urban Forestry Ordinance and would reduce potential impacts to adjacent trees. The Urban Forestry Ordinance ensures project compliance with the Urban Forestry Plan through project review through the Planning Department. As a part of project review, the Urban Forestry Plan recommends the following key elements: strategically plant appropriate street tree varieties; increase street tree population; adhere to the citywide street tree maintenance program; and to

[114] Ibid.

[115] Kahle, L.Q, M.E. Flannery, and J.P. Dumbacher, 2016. Bird-Window Collisions at a West-Coast Urban Park Museum: Analyses of Bird Biology and Window Attributes from Golden Gate Park, San Francisco. January 5.

[116] City of San Francisco. 2003. San Francisco Urban Forestry Ordinance, Chapter 12, Sec. 1204. Website: https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_environment/0-0-0-1146. Accessed July 25, 2023.

manage street trees throughout their entire lifecycle.[117] Project compliance with the Urban Forestry Plan would ensure potential impacts to adjacent trees would be less than significant.

As discussed above, the proposed project would comply with regulations for bird-safe designs within the City. Standards for Bird-Safe Buildings are addressed in the Wildlife Movement section above in detail.

With compliance of applicable policies in the San Francisco Urban Forestry Ordinance, the Standards for Bird-Safe Buildings, and compliance with existing federal and State bird protection laws, the proposed project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant.

Impact BI-6: **The proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan.** ***(No Impact)***

No adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan is applicable to the project site. Therefore, the proposed project would not conflict with the provision of such a document.

E.15 Geology and Soils

Topics:	*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*	*Not Applicable*
E.15 GEOLOGY AND SOILS					
Would the project:					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒	☐
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?	☐	☐	☒	☐	☐

[117] City of San Francisco. 2016. Urban Forest Plan. Website: https://sfplanning.org/urban-forest-plan. Accessed August 23, 2023.

Topics:	*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*	*Not Applicable*
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☒	☐	☐
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐	☐

This section describes the geology, soils, and seismicity characteristics of the project area as they relate to the proposed project. The analysis in this section is based, in part, on the geotechnical report prepared for the proposed project by Langan Engineering and Environmental Services (Langan), an independent consultant.[118] The scope of the geotechnical report included soil and groundwater conditions, site seismicity, seismic hazards, likely foundation type(s), effects on adjacent structures, basement walls, temporary shoring, seismic design, and construction considerations analyses.

The proposed project would connect to the existing sewer system. Therefore, there would be no use of septic tanks or alternative wastewater disposal systems in the proposed project, and Impact E-16(e) is not applicable.

Impact GE-1a: The proposed project would not directly or indirectly cause potential adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. ***(No Impact)***

According to the California Department of Conservation (DOC) Earthquake Zones of Required Investigation, the project site does not sit on an earthquake fault zone and does not sit on a known or potentially active fault. The project site is located in the San Francisco Bay Area, which is considered a seismically active region. Thus, there is a remote possibility of future faulting where no faults were previously known to exist, but such an event is extremely unlikely. As such, there would be no impact relating to ruptures from the proposed project.

[118] Langan Engineering and Environmental Services (Langan). 2022. Preliminary Geotechnical Evaluation, 545 Sansome Street. 15 April.

Impact GE-1b: The proposed project would not directly or indirectly cause potential adverse effects, including the risk of loss, injury, or death, strong seismic ground shaking, seismic-related ground failure, or liquefaction *(Less than Significant Impact)*

The closest faults to the project site are the San Andreas, Hayward, and San Gregorio Faults.[119] The project site is approximately 8 miles east of the North San Andreas Fault, 10 miles southwest from the Hayward Fault, and 12 miles east of the San Gregorio Fault. Furthermore, the USGS has predicted that the San Francisco Bay Area has a 72 percent probability of experiencing a magnitude 6.7 or greater earthquake in the next 30 years.[120] The proposed project would therefore most likely experience periodic minor earthquakes, and perhaps an earthquake of magnitude 6 or greater during its service life.

The proposed project would modify an existing building on the project site by building an additional nine floors. The proposed project would also demolish the existing building on 501-505 Washington Street to allow for the proposed extensions of the 545 Sansome Street building. The existing 501-505 Washington Street building is supported by shallow footings, which would be replaced with deep pile foundations for the proposed 545 Sansome Street building expansion. The proposed expansion would be supported on deep foundations that gain support in the very stiff to hard Old Bay Clay layer and in bedrock. Deep foundation options include torqued-in pipe piles, drilled piers, augered cast-in-place piles, and micropiles. Assuming an approximate 5 feet embedment of piles into bedrock, the piles would be between 105 to 165 feet long. Alternatively, piles establishing foundation in the Old Bay Clay would likely be on the order of 80 feet long. The geotechnical consultant notes that micropiles would likely be the most feasible on the project site.[121]

The potential for adverse effects related to geology and soils are carefully addressed by the State and local regulatory processes for review and approval of building permits, including the CBC and the San Francisco Building Code, which contains State building code and local amendments that supplement the code, including the San Francisco Building Department's (Building Department) administrative bulletins. The proposed project would be required to follow the Building Department's local implementing procedures, including administrative bulletins, and information sheets, which clarify Building Department requirements and procedures. The review process for structural, geotechnical, and seismic hazard engineering design, has been guided by the 2018 update of the Administrative Bulletin AB-082, Guidelines and Procedures for Structural, Geotechnical, and Seismic Hazard Engineering Design Review.[122] The review includes characteristics considered in determining whether a review is required, and if so, which reviews are required.

The proposed project would adhere to the Building Department's permit review process and AB-082 guidelines, ensuring that structural and foundation plans comply with applicable building code provisions and conform to measures recommended in the project-specific geotechnical report, and the recommendations made by the engineering review team (as required by AB-082).[123] Therefore, the impacts of the proposed project in relation to strong seismic ground shaking would be less than significant.

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[119] California Department of Conservation (DOC). 2022. Earthquake Zones of Required Investigation Map. Website: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed July 25, 2023.

[120] Langan Engineering and Environmental Services (Langan). 2022. Preliminary Geotechnical Evaluation, 545 Sansome Street. April.

[121] Ibid.

[122] San Francisco Building Inspection Commission. 2018. AB-082 Guidelines and Procedures for Structural Design Review. November.

[123] Ibid.

Additionally, the project site is located within a designated liquefaction hazard zone.[124] The potential for liquefaction was analyzed during the geotechnical investigation. The geotechnical investigation identified the surface fill and recent Bay deposits down to depths ranging from 24 to 37 feet bgs as susceptible to liquefaction during a potential major seismic event at the project site.[125] Following a seismic event, the project site is estimated to potentially have a fill and native sand liquefaction-induced settlement of between 1.5 to 3.5 inches. This settlement is expected to be erratic and vary significantly across the site.[126] In addition, there is potential for lateral spreading on the project site.[127] Based on earlier studies, the project site has also experienced past events of cyclic densification in layers between the surface and the groundwater elevation.[128] These layers these layers could settle during a major earthquake, with associated ground surface settlements of about 0.5 to 3 inches during a major earthquake.

The proposed project would undergo the Building Department permit review process, which would ensure that the proposed project's structural and foundation plans comply with applicable building code provisions and conform to the measures recommended in the project-specific geotechnical report. Conformance with the review process and recommendations made by the engineering design review team, as required by AB-082, would ensure that the proposed project would not exacerbate the potential for seismic-related ground failure, including liquefaction and lateral spreading. Therefore, this impact would be less than significant.

The proposed project would not exacerbate the potential for ground shaking or liquefaction-related geologic hazards. Although the proposed project and future occupants would be located in a seismically active area with the associated geologic hazards of a future seismic event, the proposed project design and compliance with applicable building standards, Administrative Bulletin AB-083, and the Seismic Hazards Act would minimize potential hazards. Therefore, this impact would be less than significant, and no mitigation measures are required.

Impact GE-1c: The proposed project would not directly or indirectly cause potential adverse effects, including the risk of landslides. *(No Impact)*

The project site is generally flat and not within a designated landslide zone.[129] Therefore, the proposed project would have no impact with respect to the potential for landslides.

Impact GE-2: The proposed project would not result in substantial loss of topsoil or erosion. *(Less than Significant Impact)*

The project site is generally flat and impervious, and underlain with a heterogeneous fill of medium density sand, clayey sand, silty sand, and construction debris, approximately 15 to 20 feet thick, increasing in thickness to the southeast corner.[130] The project site also does not contain native topsoil. The proposed project involves limited excavation activities to expand the existing basement, resulting in an expected excavation up to 14 feet bgs and displacing approximately 58,150 cubic yards, thus creating the potential for

[124] Ibid.

[125] Langan Engineering and Environmental Services (Langan). 2022 Preliminary Geotechnical Evaluation, 545 Sansome Street. April.

[126] Ibid.

[127] Ibid.

[128] Ibid.

[129] California Department of Conservation (DOC). 2022. Earthquake Zones of Required Investigation Map. Website: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed July 25, 2023.

[130] Ibid.

windborne and waterborne soil erosion. However, the proposed project would be required to comply with the Construction Dust Control Ordinance by including watering plans, particulate matter monitoring (PM_{10}), establishment of a complaint hotline, enforcement of speed limits on the construction site, and other measures as specified in Article 22B of the Health Code to reduce the risk of erosion. Therefore, the development of the proposed project would not result in the loss of topsoil.

In accordance with Article 4.2 of the San Francisco Public Works Code, the construction contractor would be required to implement an erosion and sediment control plan for construction activities. Compliance with these requirements would ensure that the proposed project would not result in soil erosion. Therefore, impacts related to soil erosion or loss of topsoil would be less than significant, and no mitigation measures would be required.

Impact GE-3: The proposed project would not 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-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. ***(Less than Significant Impact)***

As discussed under Impact GE-1c, the project site is not within an area that is susceptible to landslides. The project site and vicinity do not include any hills or cut slopes that could cause or be subject to a landslide or soil movement. The proposed project would not use any water or petroleum injections or extractions, and therefore would not be subject to or cause subsidence. As discussed above, the project site is located within a State-designated liquefaction zone and would be subject to the requirements of the Seismic Hazards Act.

Furthermore, the proposed project is required to comply with the provisions of the CBC and the San Francisco Building Code that address issues related to seismic safety and unstable soil. The geotechnical report includes recommendations related to demolition and site preparation, grading, excavation, foundation, and shoring as part of the construction process. Implementation of these recommendations would address potential issues of unstable soil conditions that could result in on-site or off-site subsidence, liquefaction, or collapse on the project site. Thus, this impact would be less than significant, and no mitigation measures are required.

Impact GE-4: The proposed project would not create substantial risks as a result of being located on expansive soil. ***(Less than Significant Impact)***

Expansive soils expand and contract in response to changes in soil moisture, most notably when near-surface soils fluctuate from saturated to low-moisture-content conditions and back again. Determinations regarding the presence of expansive soils are typically based on-site-specific data. The project site is currently filled by Bay Mud (a weak, compressible clay), dense to very dense clayey sands/medium stiff to hard sandy clays and dense to very dense sands. According to the geotechnical report, these expansive materials are located below the zone of moisture change and should have no adverse effect on the proposed project.[131] Therefore, potential impacts related to expansive soils would be less than significant and no mitigation measures are required.

[131] Langan Engineering and Environmental Services (Langan). 2022. Preliminary Geotechnical Evaluation, 545 Sansome Street. April.

Impact GE-5: The proposed project could directly or indirectly destroy a unique paleontological geologic feature. *(Less than Significant Impact with Mitigation Incorporated)*

Paleontological resources include fossilized remains and traces of animals, plants, and invertebrates from a previous geological period. Paleontological resources are deposited and preserved within lithologic units. Lithologic units that may contain fossils include sedimentary and volcanic formations. Collecting localities and the geologic formations containing those localities are also considered paleontological resources because they represent a limited resource that, once destroyed, cannot be replaced. Lithologic units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered are likely to contain additional significant paleontological resources.[132]

The project site is potentially located within a Moderate Sensitivity Area (Class 3),[133] which designates the site as having varied or unknown fossil content, occurrences, and discovery potential.[134] The proposed project would require ground-disturbing activities deeper than 5 feet and would include the removal of more than 2,500 cubic yards of soil, and would therefore require the property owner or designee to engage a qualified Paleontologist to complete a site-specific Pre-construction Paleontological Resources Evaluation prior to commencing soil disturbing activities occurring on the project site, as is required for projects in moderate sensitivity zones.

The entire proposed project would excavate an area of approximately 10,360 square feet and remove approximately 2,900 cubic yards of soil. In addition, excavation of the basement extension would excavate down to a maximum of 14 feet bgs. The geotechnical investigation indicates that the materials encountered would be fill, Bay Mud, Old Bay Clay, and potentially the Colma Formation sand.[135] The fill would not contain paleontological resources, and the Bay Mud and Old Bay Clay would likely be too young (less than 5,000 years old) to contain unique paleontological resources. The Colma Formation sand is found between 15 to 57 feet bgs, and thus may be encountered during excavation activities. Previously occurrences of large late Pleistocene vertebrate remains from three individuals of Colombian mammoth (*Mammuthus columbi*) and remains from a single giant bison (*Bison latifrons*) have been recovered from gravelly sandy clay of the Colma Formation exposed in an excavation at the intersection of Pacific Avenue and Kearny Street, approximately 0.25 mile northwest of the project site.[136]

Because the potential exists that deep foundations for the new structure, as well as the proposed project's basement extension, could extend as far as the Colma Formation, there is some potential for the proposed project's excavation activities to encounter as-yet unknown paleontological features. However, the proposed project would implement Mitigation Measure M-GE-5a, Pre-construction Paleontological Evaluation; Mitigation Measure M-GE-5b, Worker Environmental Awareness Training during Ground-Disturbing Construction Activities; and Mitigation Measure M-GE-5c, Discovery of Unanticipated Paleontological Resources during Ground-Disturbing Construction Activities. Mitigation Measure M-GE-5a would require that the proposed project conduct complete a site-specific Pre-construction Paleontological

[132] Society of Vertebrae Paleontology. 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources.

[133] The adjacent parcel at 530 Sansome Street was identified as occurring in Moderate Sensitivity Area (Class 3).

[134] Paleontology Center of Excellence and R-2 Paleo Initiative. 1996. Probable Fossil Yield Classification – (PFYC). Website: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5340403.pdf. Accessed July 25, 2023.

[135] Langan Engineering and Environmental Services (Langan). 2022. Preliminary Geotechnical Evaluation, 545 Sansome Street. April.

[136] Rodda, Peter and Nina Baghai. 1993. Late Pleistocene Vertebrates from Downtown San Francisco, California. Journal of Paleontology. November.

Resources Evaluation prior to commencing soil disturbing activities occurring on the project site to determine whether the project site is within a sensitive area. Mitigation Measure M-GE-5b would require that prior to and during construction, all construction workers involved in the proposed project are trained on the contents of the Paleontological Resources Alert Sheet. In the event of the discovery of an unanticipated paleontological resource during construction, Mitigation Measure M-GE-5c would require that ground-disturbing activities within 20 feet of the discovery would be temporarily halted until a qualified Paleontologist examines it, consistent with the standards set by the Society of Vertebrate Paleontology and the Best Practices in Mitigation Paleontology.

With implementation of Mitigation Measure M-GE-5a, Mitigation Measure M-GE-5b, and Mitigation Measure M-GE-5c, the proposed project would result in a less than significant impact on unique paleontological features.

Impact C-GE-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact to geology and soils. *(Less than Significant Impact)*

Generally, impacts to the geology, soil, and paleontology of a project are site-specific and localized. because each project site has its own geologic and soils conditions, and each project has its own design characteristics Cumulative projects would also be subject to Building Department requirements regarding geotechnical review and the State and local building codes. In addition, site-specific geotechnical review and monitoring for paleontological resources would reduce each project's impacts associated with geology, seismic safety, and paleontological resources. Furthermore, site- specific mitigation would be developed, when necessary, based on-site conditions. The cumulative projects listed in Section B would also be subject to the same compliance with the CBC, mandatory seismic safety standards, and design review procedures as the proposed project. Compliance with these standards and procedures would ensure that the cumulative effects from nearby cumulative projects would be less than significant. Therefore, the proposed project in conjunction with other cumulative development would not adversely impact paleontological resources, or expose people or structures to substantial adverse effects, including the risk of loss, injury, or death in the event of a major earthquake; fault rupture; ground shaking; seismic-related ground failure; landslide; or liquefaction. Therefore, cumulative impacts on the geology and soils of the area would be less than significant.

E.16 Hydrology and Water Quality

Topics:	*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*	*Not Applicable*
E.16 HYDROLOGY AND WATER QUALITY					
Would the project:					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐	☐

Topics:			Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?		☐	☐	☒	☐	☐
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:		☐	☐	☒	☐	☐
	i)	Result in substantial erosion or siltation on- or 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?	☐	☐	☒	☐	☐
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due a project inundation?		☐	☐	☐	☐	☒
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?		☐	☐	☒	☐	☐

The project site is located inland from both the San Francisco Bay and the Pacific Ocean. It would not be subject to seiche or potential inundation in the event of a tsunami occurring along the San Francisco coast, as it is not found in a tsunami hazard area or potential inundation area.[137,138] In addition, the project site is not located within a Special Flood Hazard Area and would therefore not be at risk of a 100-year flood.[139] Thus, Impact E.16(d) does not apply.

Impact HY-1: **The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. *(Less than Significant Impact)***

[137] California Department of Conservation (DOC). 2009. California Geological Survey Tsunami Hazard Area Map. Website: https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/?extent=-13638549.0627%2C4536570.1047%2C-13622115.1016%2C4554762.1174%2C102100&utm_source=cgs+active&utm_content=sanfrancisco. Accessed July 25, 2023.

[138] California Department of Water Resources. 2015. Dam Breach Inundation Map Web Publisher. Website: https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2. Accessed July 25, 2023.

[139] San Francisco Planning Department. July 2022. 100-Year Storm Flood Risk Map. Website: https://sfplanninggis.org/floodmap/. Accessed July 25, 2023.

The proposed project would disturb soil to a depth of up to 14 feet bgs, which would require an excavation of approximately 2,900 cubic yards of material, potentially affecting water quality in the area. Contaminants from construction vehicles and equipment, as well as sediment from soil erosion, could increase the pollutant load in runoff being transported to receiving waters during construction.

The project-specific geotechnical report identified the potential for groundwater to be present between 10 and 15 feet bgs.[140] Groundwater encountered during construction of the proposed project would be subject to the requirements of Article 4.1 of the San Francisco Public Works Code, Industrial Waste, which requires groundwater to meet specified water quality standards before it is discharged to the combined sewer system. These measures ensure the protection of water quality during construction, which represents a temporary condition. The Bureau of Systems Planning, Environment, and Compliance of the SFPUC must be notified regarding projects that necessitate dewatering. In this case, the SFPUC may require water quality analysis prior to discharge. The project sponsor would be required to obtain a Batch Wastewater Discharge Permit from the SFPUC Wastewater Enterprise Collection System Division prior to any dewatering activities.

Wastewater and stormwater from the proposed project would continue to flow into the City's combined stormwater and sewer system. Wastewater and stormwater would be treated to the effluent discharge standards contained within the City's NPDES Permit for the Southeast Water Pollution Control Plant prior to discharge into San Francisco Bay. Additionally, the proposed project would be required to meet the standards for stormwater management identified in the San Francisco Stormwater Management Ordinance and meet the SFPUC stormwater management requirements, per the 2016 Stormwater Management Requirements and Design Guidelines.

To satisfy the SFPUC's 2016 Stormwater Management Requirements and Design Guidelines, the proposed project would also include the submission of a compliant Stormwater Control Plan for SFPUC approval. The proposed project would disturb more than 5,000 square feet of ground surface and would therefore also be required to comply with public works code Article 4.2, Sections 146 *et seq.* (Construction Site Runoff Control). A construction site runoff control permit would be obtained prior to any land-disturbing activities and would include an erosion and sediment control plan.

The proposed project's construction and operational activities would not substantially degrade surface water or groundwater quality or violate water quality standards and waste discharge requirements. Thus, the impact of the proposed project on water quality would be less than significant, and no mitigation measures are necessary.

Impact HY-2: **The proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the proposed project would impede sustainable groundwater management of the basin. *(Less than Significant Impact)***

The project site is currently fully impervious, and the proposed project would therefore not increase the amount of impervious surface on the project site. Thus, the proposed project would not result in any change in infiltration on or increase runoff from the project site.

[140] Langan Engineering and Environmental Services (Langan). 2022. Preliminary Geotechnical Evaluation, 545 Sansome Street. April.

As stated in Impact HY-1, groundwater was located between 10 and 15 feet bgs, varying in depth with the seasons and the amount of rainfall.[141] Since excavations during construction of the proposed project would occur down to 14 feet bgs, it is likely that groundwater would be encountered; therefore, dewatering would be required during construction.

The project site is located within the downtown San Francisco groundwater basin. All groundwater resources are managed by the SFPUC's groundwater management program, ensuring that local groundwater resources designated for current or future beneficial uses are properly protected to prevent overdraft, pollution, or contamination. Project operation would not extract underlying groundwater supplies. Therefore, groundwater resources would not be substantially depleted, and the proposed project would not otherwise substantially interfere with groundwater recharge or impede sustainable groundwater management. The proposed project's impact on groundwater would be less than significant, and no mitigation measures are necessary.

Impact HY-3: **The proposed project would not substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river or the addition of impervious surfaces that would result in substantial erosion, siltation, or flooding; substantially increase the rate or amount of surface runoff and result in flooding on-site or off-site; or create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.** ***(Less than Significant Impact)***

The project site does not contain any streams or creeks and contains only impervious surfaces. The proposed project would maintain most of the existing impervious surfaces on the project site, with the exception of the POPOS and adjacent private open space, as shown in Figure 5, Proposed Site Plan. Both open spaces would contain sheltered landscaped areas with spacing and planting matching the design of the existing Redwood Park, potentially reducing the amount of impervious surface on the project site.[142] In addition, the proposed project is subject to the 2016 Stormwater Management Ordinance, which requires stormwater runoff to be reduced by 25 percent from existing conditions. Thus, the proposed project and the associated open space elements would be designed to incrementally reduce the amount of impervious surface material on the project site through implementation of low-impact development and other measures identified in the Stormwater Management Ordinance, which also requires a decrease in the amount of stormwater runoff associated with a proposed project, per the City's Stormwater Management Requirements and Design Guidelines. The design elements of the proposed project, combined with the Stormwater Management Ordinance, would help reduce the peak flow of the project site into the City's drainage system. Therefore, the project site's drainage patterns would not be adversely affected by the proposed project. As such, the proposed project would not be expected to result in substantial erosion or flooding associated with changes in drainage patterns; the potential to result in erosion or flooding would be similar to existing conditions. The impact would be less than significant.

During construction and operation of the proposed project, all wastewater and stormwater runoff from the project site would be treated at the Southeast Water Pollution Control Plant. As stated under Impact HY-1, treatment would be provided pursuant to the effluent discharge standards contained in the City's NPDES permit for the plant. The proposed project would also be required to comply with all local water discharge,

[141] Langan Engineering and Environmental Services (Langan). 2022. Preliminary Geotechnical Evaluation, 545 Sansome Street. April.
[142] SHVQ. 2022. 3 Transamerica 545 Sansome Street Planning Submission. November.

stormwater runoff, and water quality requirements, including the 2016 Stormwater Management Requirements and Design Guidelines, described above under Impact HY-1, and the Stormwater Management Ordinance. Compliance with the Stormwater Management Requirements and Design Guidelines would ensure that stormwater generated by the proposed project would be managed on-site to reduce the runoff flow rate and volume for a 2-year 24-hour design storm by 25 percent, such that the proposed project would not contribute additional volumes of polluted runoff to the City's stormwater infrastructure. Compliance with the Stormwater Management Ordinance would ensure that the design of the proposed project would include the installation of appropriate stormwater management systems that would retain runoff on-site, promote stormwater reuse, and limit discharges from the site to the City's combined stormwater/sewer system.

Furthermore, the addition of new street trees along the project site frontages on Washington Street and Sansome Street, and the plantings and landscaping along the POPOS and private open space facing Redwood Park would increase permeable surfaces on-site and increase infiltration, thereby minimizing runoff from the project site. Therefore, the proposed project would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. The proposed project would also not impede or redirect flood flows. Therefore, the proposed project would have a less than significant impact, and no mitigation measures are necessary.

Impact HY-4: The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. ***(Less than Significant Impact)***

As noted under Impact HY-1 and Impact HY-3, the proposed project would be required to meet the standards for stormwater management as well as the City's NPDES permit and SFPUC stormwater management requirements. In addition, the proposed project would also have to comply with the appropriate water quality objectives for the region. Commonly practiced BMPs would be implemented to control construction site runoff and reduce the discharge of pollutants to storm drain systems from stormwater and other nonpoint-source runoff. As part of compliance with permit requirements during ground-disturbing or other construction activities, implementation of water quality control measures and BMPs would ensure that water quality standards would be achieved, including the water quality objectives that protect designated beneficial uses of surface and groundwater, as defined in the basin plan.

Impact C-HY-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts on hydrology and water quality. ***(Less than Significant Impact)***

Cumulative development in the project site vicinity would cause an intensification of land uses in the project area similar to the proposed project. This could result in an increase in polluted runoff and stormwater discharges. However, other development projects would be subject to the same water conservation and stormwater management ordinances that are applicable to the proposed project. Because other development projects would be required to comply with drainage, dewatering, and water quality regulations and comply with the NPDES permit, similar to the proposed project, peak stormwater drainage rates and volumes for the design storm would gradually decrease over time with new development. This would mean that no substantial cumulative effects would occur. Compliance with these ordinances would result in a less than significant impact from the effects of cumulative projects. Therefore, the proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a

significant cumulative impact related to hydrology and water quality. Cumulative impacts would be less than significant. No mitigation measures are necessary.

E.17 Hazards and Hazardous Materials

Topics:		*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*	*Not Applicable*
E.17	**HAZARDS AND HAZARDOUS MATERIALS**					
	Would the project:					
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐	☐
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐	☐
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐	☐
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐	☐
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☐	☒
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐	☐
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☐	☒

The project site is not included within an airport land use plan area, or within or adjacent to a wildland fire area. Therefore, topics E.18(e), and E.18(g) are not applicable. The analysis in this section is based on a Phase I Environmental Site Assessment prepared by CBRE dated February 14, 2018.

Impact HZ-1: **The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.** ***(Less than Significant Impact)***

The proposed project would involve the demolition of structures, excavation of the site for building foundations and utility connections, expansion of the existing building on 545 Sansome Street, expansion of the basement level up to a maximum of 14 feet bgs in depth, and development of publicly accessible open spaces and retail areas. Construction activities would use and transport limited quantities of hazardous materials such as fuels and oils, solvents and cleaning solutions, paints and thinners, and other common construction materials. These materials could be released during transport, use, or disposal of building materials and could cause a hazard for the public. However, the City would require the project applicant to implement BMPs as part of grading permit requirements, including hazardous materials management measures, which would reduce short-term construction-related impacts pertaining to the transport, use, and disposal of hazardous materials. The proposed project would also conform with City regulations regarding the disposal of hazardous materials, which have been delineated in the Hazardous Waste Management section of the San Francisco Health Code, Article 22. Furthermore, the project sponsor's contractors would be required to comply with OSHA and California Division of Occupational Safety and Health (Cal/OSHA) health and safety requirements, which effectively reduce potential risks to workers.

The proposed project would also demolish the existing single-story retail building and the concrete-capped basement on the project site. The existing single-story building, being built in 1977, slightly precedes the ban on lead-based paint in 1978 and the various ban on asbestos-containing materials throughout the 1970s.[143,144,145] The concrete-capped basement is of an unknown age; thus, it could also potentially contain asbestos-containing materials or lead-based paint. If it is found to contain asbestos or lead-based paint during demolition, these materials would be abated and disposed of in compliance with federal, State, and local standards and requirements.

The project sponsor's contractors would be required to comply with OSHA and Cal/OSHA health and safety requirements, all of which would be specified in the construction contracts. These regulations are effective in reducing potential risks to workers by requiring the contractor to adhere to safety standards and provide safety training to workers.

In addition, hazardous materials must be transported to and from the project site in accordance with the Resource Conservation and Recovery Act (RCRA) and United States Department of Transportation (USDOT) regulations and disposed of in accordance with the Resource Conservation and Recovery Act and the California Code of Regulations at a licensed facility that is permitted to accept the waste. These regulations provide a framework for controlling hazardous waste from cradle to grave, ensuring the safe transport, use, and disposal of hazardous materials during construction. These regulations govern recordkeeping for all aspects of the hazardous materials lifecycle, mitigating and cleaning up existing contamination and hazardous materials spills, closing facilities with hazardous waste in place, describing requirements for emergency response, and ensuring that workers are trained to handle hazardous materials and respond appropriately to hazardous materials incidents.

Because compliance with existing regulations is mandatory, construction of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal

[143] SHVO. 2022. 3 Transamerica, 545 Sansome Street Planning Submission. November 16.

[144] United States Environmental Protection Agency (EPA). 2023. EPA Actions to Protect the Public from Exposure to Asbestos. Website: https://www.epa.gov/asbestos/epa-actions-protect-public-exposure-asbestos. Accessed July 11, 2023.

[145] Center of Disease Control and Prevention (CDC). 2022. Lead in Paint. Website: https://www.cdc.gov/nceh/lead/prevention/sources/paint.htm#print. Accessed July 11, 2023.

of hazardous materials. Accordingly, impacts associated with short-term construction-related transport, use, and disposal of hazardous materials would be less than significant.

During operations, the proposed project would likely use common types of hazardous materials that are typically associated with commercial retail and office uses, such as cleaning products, disinfectants, and solvents. These products are labeled to inform users of their potential risks and provide instruction regarding appropriate handling procedures. Most of these materials would be consumed through use, resulting in little waste.

The proposed project would also be subject to the San Francisco Health Code (Articles 21 and 22). The code was implemented by the health department to ensure employee safety by identifying hazardous materials in the workplace, providing safety information to workers who handle hazardous materials, and adequately training workers. Under Article 21, any facility that handles hazardous materials, including hazardous wastes, in excess of specified quantities would be required to obtain a certificate of registration from the health department and to implement a hazardous materials business plan that includes inventories, a program for reducing the use of hazardous materials and generation of hazardous wastes, site layouts, a program and implementation plan for training all new employees. and annual training for all employees, and emergency response procedures and plans. Under Article 22 of the health code, generators of hazardous waste must pay an annual fee to the health department, based on the quantity of hazardous waste generated annually. With these requirements, hazardous materials used during proposed project operations would not pose substantial public health or safety hazards resulting from routine use, transport, or disposal. Therefore, the proposed project would result in less than significant impacts related to the use, transport, or disposal of hazardous materials during project construction or operation.

Impact HZ-2: The proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable conditions involving the release of hazardous materials into the environment. *(Less than Significant Impact)*

The project is located within the Maher zone and is thus subject to the requirements of the Maher Ordinance (San Francisco Health Code Article 22A).[146] The goal of the Maher Ordinance is to protect public health and safety by requiring appropriate handling, treatment, disposal and when necessary, remediation of contaminated soils that are encountered in the building construction process. Projects that disturb 50 cubic yards or more of soil that are located on sites with potentially hazardous soil or groundwater are subject to this ordinance. The proposed project would disturb approximately 58,150 cubic yards of soil. Therefore, the proposed project is subject to the Maher Ordinance, which is administered and overseen by the health department.

The Maher Ordinance requires the project sponsor to retain the services of a qualified professional to prepare an environmental site assessment that meets the requirements of San Francisco Health Code Section 22.A.6. A site assessment determines the potential for site contamination and the level of exposure risk as a result of a project. Based on that information, the project sponsor may be required to conduct soil and groundwater sampling and analysis; where such analysis reveals the presence of hazardous substances in excess of State or federal standards, the project sponsor is required to submit a site mitigation plan to the

[146] San Francisco Planning Department. 2019. San Francisco Property Information Map - Map Viewer, Maher Ordinance. Website: https://sfplanninggis.org/pim/map.html?search=545%20SANSOME%20ST&layers=Maher%20Ordinance. Accessed July 25, 2023.

health department or other appropriate State or federal agency and remediate any site contamination in accordance with the approved site mitigation plan prior to issuance of a building permit.

A project-specific Phase I Environmental Site Assessment (Phase I ESA) was prepared to determine the project site's potential for contamination. The Maher Ordinance application and Phase I Phase I ESA were submitted to the health department on January 31, 2020.[147] The Phase I ESA included a reconnaissance-level site visit to look for evidence of past or current uses that may involve release of hazardous materials or petroleum products, a review of information provided by the property owners, a review of environmental database records, a review of federal, State, and local records relevant to a Phase I ESA, a review of relevant documents and maps regarding local geologic and hydrogeologic conditions, and a review of historical documents, including aerial photographs, Sanborn Fire Insurance maps, and topographical maps.[148]

The Phase I ESA found that there were no underground storage tanks (USTs) located on 545 Sansome Street, although one UST was found on 505 Sansome Street, and two USTs were found on 600 Montgomery Street, both of which are adjacent to the project site. Monitoring of the adjacent USTs revealed that as of 2016 for the 600 Montgomery Street USTs and 2017 for the 505 Sansome Street UST, all USTs passed safety and tightness checks. Further evidence of former USTs was found at 505 Sansome Street and 600 Montgomery Street, but the Phase I ESA concluded that these former USTs did not pose a significant negative environmental impact. All cases are closed.[149]

The Phase I ESA found evidence of various asbestos-containing materials throughout the project vicinity and on the project site. These included building materials such as pipe insulation, floor tile, pipe insulation elbows, tank insulation, mastic, transite panels, and fireproofing.[150] However, observed asbestos-containing materials were found in generally good condition under existing Asbestos Operations and Maintenance Programs. As discussed above, both existing buildings on the project site were built prior to 1978. As such, lead-based paint was potentially used during the construction of said buildings. The Phase I ESA found that paint on 545 Sansome Street exhibited small signs of flaking and peeling on the upper portions of the existing building but determined that the observed amount would not cause a significant environmental concern. The Phase I ESA did not find any Recognized Environmental Conditions (RECs) on the project site. However, as discussed above, the proposed project would demolish portions of the building that could contain asbestos and lead-based paints.

Any hazardous materials currently on the site would be removed during or prior to demolition of the building and project construction per California Department of Toxic Substances Control (DTSC) regulations as well as in compliance with other applicable laws and regulations such as air district, Cal/OSHA, the San Francisco Building Code, and California Department of Health Services. Issuance of the proposed project's building permit would be contingent on the project sponsor's compliance with all applicable requirements.

Mandatory compliance with the Maher Ordinance and the above regulations would ensure that the proposed project would not expose people in the project vicinity to unacceptable risk levels in the event of a disturbance or release of hazardous substances. In addition, the proposed project would be required to

[147] San Francisco Department of Public Health. 2020. Maher Ordinance Application. January 31.

[148] CBRE. 2018. Phase I Environmental Site Assessment, Pyramid Block. February 14.

[149] California State Water Resources Control Board (State Water Board). GeoTracker. Website: https://geotracker.waterboards.ca.gov/. Accessed September 14, 2023.

[150] California State Water Resources Control Board (State Water Board). GeoTracker. Website: https://geotracker.waterboards.ca.gov/. Accessed September 14, 2023.

conduct soil and groundwater sampling and prepare a site mitigation plan, if determined necessary by the health department. As such, the proposed project would not result in a significant hazard to the public or environment from contaminated soil and/or groundwater, asbestos, or lead-based paint, and the proposed project would result in a less than significant impact with respect to these hazards. No mitigation is needed.

Impact HZ-3: The proposed project would not emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. ***(Less than Significant Impact)***

The project site is within 0.21 mile of John Yehall Chin Elementary School, at 350 Broadway.

As discussed under Impact HZ-2, any hazardous materials currently on the project site, such as potential asbestos-containing materials or lead-based paints, would be removed before demolition of the 501-505 Washington Street Building and prior to construction. Hazardous materials would be handled in compliance with applicable laws and regulations. During operations of the proposed project, the storage, handling, and disposal of hazardous materials would be conducted in accordance with applicable State and federal laws and regulations, which would ensure that hazardous materials are handled safely and there would be no potential for such materials to affect the nearest schools. Therefore, the proposed project would have a less than significant impact related to hazardous emissions or materials within 0.25 mile of a school. No mitigation measures are necessary.

Impact HZ-4: The proposed project would not interfere with implementation of an adopted emergency response plan or evacuation plan. ***(Less than Significant Impact)***

Emergency response and evacuation within San Francisco is governed by the Department of Emergency Management's Emergency Management Program, which is a jurisdiction-wide system that provides emergency management actions for the prevention of, preparedness for, response to, and recovery from, any emergency or disaster.[151] The Emergency Management Program is coordinated with State and federal plans, and is consistent with the Standardized Emergency Management System and the National Incident Management System.[152]

Fire protection and safety measures are ensured throughout San Francisco via the City's Building and Fire Codes. Prior to approval, the proposed project's final building plans would be reviewed and approved by the Fire Department and Building Department, to ensure conformance with these provisions. As such, potential fire hazards associated with the proposed project, such as emergency access issues and fire hydrant water pressures, would be addressed during the permit review process. Compliance with fire safety regulations would ensure that the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan or expose people or structures to a significant risk of loss, injury, or death involving fires.

As discussed in section E.5, Transportation, the proposed project would not result in a significant increase in vehicular traffic in the project vicinity. Furthermore, it is expected that project-related traffic would be dispersed within the existing street grid, such that there would be no significant adverse impacts on transportation conditions. Thus, traffic conditions would not be significantly impacted in the event of an

[151] City and County of San Francisco. 2017. Emergency Response Plan. May.
[152] Ibid.

emergency evacuation. Therefore, the proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. This impact would be less than significant, and no mitigation measures are necessary.

Impact C-HZ-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts related to hazards and hazardous materials. *(Less than Significant Impact)*

Impacts from hazards and hazardous materials are generally site-specific and typically do not combine with impacts from cumulative projects to result in significant cumulative impacts. New developments in the vicinity of the project site would be subject to the same regulatory requirements as the proposed project. As such, large or unexpected releases of hazardous materials of the type that would contribute to significant cumulative impacts would not be expected. In addition, compliance with existing federal, State, and local regulations regarding the treatment and management of hazardous materials would ensure that the proposed project would not combine with cumulative projects in the vicinity to result in a significant cumulative impact. Therefore, cumulative hazards impacts would be less than significant, and no mitigation measures would be required.

E.18 Mineral Resources

Topics:	*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*	*Not Applicable*
E.18 MINERAL RESOURCES					
Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	☐	☐	☐	☒	☐
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒	☐

Impact MR-1: The proposed project would not result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site. *(No Impact)*

The project site, and the surrounding area, is designated Mineral Resource Zone 1 (MRZ-1) by the California Division of Mines and Geology under the Surface Mining and Reclamation Act of 1975.[153] This designation indicates that there are no mineral resources of economic value or locally important mineral resource

[153] California Division of Mines and Geology (CDMG). 1996. Generalized Mineral Land Classification Map of the South San Francisco Bay Production-Consumption Region, Open File Report 96-03.

recovery sites in the area. Based on the MRZ-1 designation, the project site does not contain mineral deposits or a locally important mineral resource recovery site. Therefore, the proposed project would have no impact on mineral resources.

Impact C-MR-1: The proposed project, in combination with cumulative projects, would not result in a cumulative impact on mineral resources. *(No Impact)*

The surrounding area in a 0.25-mile radius of the project site is all designated MRZ-1 by the California Division of Mines and Geology. As discussed above, this indicates that indicates that there are no mineral resources of economic value, or locally important mineral resource recovery sites in the area. Thus, the proposed project would not combine with cumulative projects in the project vicinity to create a significant cumulative impact on mineral resources.

E.19 Energy

Topics:	*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*	*Not Applicable*
E.19 ENERGY					
Would the project:					
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐	☐
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐	☐

Impact EN-1: The proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation or conflict with or obstruct a State or local plan for renewable energy or energy efficiency. *(Less than Significant Impact)*

The proposed project would increase the daytime population and intensity of the use on the project site. However, this increased intensity would not exceed anticipated growth in the area. The proposed project would be subject to the energy conservation standards included in the San Francisco Green Building Ordinance. This would require the project to meet a number of conservation standards (e.g., install water-efficient fixtures and energy-efficient appliances) and provide features that encourage alternative modes of transportation, such as bicycle racks. Documentation showing compliance with the San Francisco Green Building Code would be submitted with building permits and enforced by the Building Department. In addition, the proposed project would be required to comply with Title 24 of the California Code of Regulations, which regulates energy consumption associated with heating, cooling, and ventilation; it is enforced by the Building Department. Compliance with Title 24 and the San Francisco Green Building

Ordinance would ensure a reduction in the use of fuel, water, and energy by the proposed project. The all-electric building design (no use of natural gas) would decrease reliance on fossil fuels and increase reliance on renewable energy sources. The proposed project would conserve fuel and energy because it would provide office/retail uses in an urban area that is accessible by transit and is also bicycle- and pedestrian-friendly. Therefore, the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources or conflict with State or local plans for renewable energy and energy efficiency. The impact would be less than significant, and no mitigation would be required.

Impact C-EN-1: The proposed project or residential variant, in combination with past, present, and reasonably foreseeable future projects, would increase the use of energy, fuel and water resources, but not in a wasteful manner. ***(Less than Significant Impact)***

While overall energy demand in California is increasing commensurate with increasing population, the State is also making concerted energy conservation efforts. While the City produces a substantial demand for energy and fuel, both City and State policies seek to minimize increases in demand through conservation and energy efficiency regulations and policies such that energy is not used in a wasteful manner, and the cumulative impacts with respect to energy and fuel use. Because San Francisco is substantially built out, development in the City's urban core focuses on densification, which effectively reduces per capita use of energy and fuel by concentrating utilities and services in locations where they can be used efficiently.

Similarly, the City recognizes the need for water conservation and has instituted programs and policies to maximize water conservation. San Francisco has one of the lowest per capita water use rates in the State and routinely implements water conservation measures through code requirements and policy. Nearby cumulative development projects would be subject to the same energy and water conservation ordinances applicable to the proposed project. Therefore, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would result in a less than significant cumulative impact related to energy, fuel, and water resources.

E.20 Agriculture and Forestry Resources

Topics:		*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*	*Not Applicable*
E.20 AGRICULTURE AND FORESTRY RESOURCES						
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:						
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	☐	☐	☐	☐	☒
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☐	☒
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☐	☒
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☐	☒
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to nonagricultural use or forest land to non-forest use?	☐	☐	☐	☐	☒

The project site does not contain any Prime Farmland, Unique Farmland, Farmland of Statewide Importance, forest, or timberlands.[154] The project site is also not zoned for agricultural, or timber uses. Furthermore, the City of San Francisco does not offer Williamson Act contracts, precluding the project site from being under such a contract.[155] Because the project site does not contain agricultural uses or forest land and is not zoned for such uses, the proposed project would not result in the conversion of farmland to nonagricultural use or forest land to non-forest use. Therefore, none of the agriculture and forest resources significance criteria is applicable to the proposed project, the proposed project would have no impact on these resources, and these topics are not discussed further.

[154] California Department of Conservation. 2016. California Important Farmland Finder. Website: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed July 25, 2023.

[155] California Department of Conservation. 2019. Land Conservation (Williamson) Act, Questions and Answers. Website: https://www.conservation.ca.gov/dlrp/wa/Pages/LCA_QandA.aspx. Accessed July 25, 2023.

E.21 Wildfire

Topics:	*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*	*Not Applicable*
E.21 WILDFIRE					
If located in or near state responsibility areas or lands classified as Very High Fire Hazard Severity Zones, would the project:					
a) Substantially impair an adopted emergency response plan or emergency evacuation plans?	☐	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☐	☒
d) Expose people or structures to significant risks including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☐	☒

The City of San Francisco does not contain any State Responsibility Area (SRA) land or lands classified as Very High Fire Hazard Severity Zones (VHFHSZ).[156] The project site has no landslide-prone areas in the immediate vicinity.[157] Therefore, none of the wildfire significance criteria are applicable to the proposed project, the proposed project would have no impact related to wildfire, and this topic is not discussed further.

[156] California Department of Forestry and Fire Protection (CAL FIRE). 2019. FHSZ Viewer. Website: https://egis.fire.ca.gov/FHSZ/. Accessed July 25, 2023.

[157] California Department of Conservation (DOC). 2015. California Geological Survey Earthquake Zones of Required Investigation Map. Website: https://maps.conservation.ca.gov/cgs/eqzapp/app/. Accessed July 25, 2023.

E.22 Mandatory Findings of Significance

Topics:		*Potentially Significant Impact*	*Less than Significant Impact with Mitigation Incorporated*	*Less than Significant Impact*	*No Impact*	*Not Applicable*
E.22 MANDATORY FINDINGS OF SIGNIFICANCE						
	Does the project:					
a)	Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐	☐
b)	Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☒	☐	☐	☐
c)	Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐	☐

a) The proposed project would not 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.

As discussed in Section E.15, Biological Resources, the proposed project would not have a significant adverse effect on a protected wildlife species or the habitat of a protected wildlife species.

As discussed in Section E.3, Cultural Resources, and Section E.4, Tribal Cultural Resources, construction activities associated with the proposed project could result in potential impacts on historic architectural resources, unknown archaeological resources, human remains, and tribal cultural resources. These impacts would be less than significant with implementation of Mitigation Measure M-CR-1, Interpretation and Relocation Plan, Mitigation Measure M-CR-2, Archaeological Testing, Mitigation Measure M-TCR-1, Tribal Cultural Resources Archaeological Resource Preservation Plan and/or Interpretive Program, and Mitigation Measure M-TCR-2.

As described in Section E.15, Geology and Soils, construction activities associated with the proposed project could result in potential impacts on paleontological resources. This impact would be less than significant

with implementation of Mitigation Measure M-GE-5a, Pre-construction Paleontological Evaluation; Mitigation Measure M-GE-5b, Worker Environmental Awareness Training during Ground-Disturbing Construction Activities; and Mitigation Measure M-GE-5c, Discovery of Unanticipated Paleontological Resources during Ground-Disturbing Construction. Therefore, the proposed project would not result in a significant impact through the elimination of important examples of major periods of California prehistory.

b) The proposed project would not have impacts that are individually limited, but cumulatively considerable.

The proposed project, in combination with the cumulative projects listed in Section B, under Cumulative Context of this study would not result in significant cumulative impacts on land use and planning, population and housing, cultural resources, tribal cultural resources, transportation and circulation, noise, air quality, GHG emissions, wind, shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, hazards and hazardous materials, mineral resources, energy resources, agricultural and forest resources, and wildfire with implementation of identified mitigation, if required. Consequently, the proposed project would not have impacts that are individually limited, but cumulatively considerable.

c) The proposed project would not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

The proposed project's potential direct and indirect adverse effects on human beings have been analyzed through the individual environmental topics of this Initial Study. As discussed above, the proposed project is anticipated to have less than significant impacts on most of the environmental topics discussed. Where necessary, mitigation measures have been identified to reduce impacts to less than significant levels. Consequently, the proposed project would not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

As described in Section E.6, Noise, the proposed project would result in temporary groundborne vibration impacts but these impacts would not exceed significance thresholds.

G. PUBLIC NOTICE AND COMMENT

On September 19, 2022, the Planning Department mailed a Notification of Project Receiving Environmental Review to owners of properties within 300 feet of the project site, adjacent occupants, and neighborhood organizations. No comments related to environmental review were received.

H. DETERMINATION

On the basis of this Initial Study:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.

Lisa Gibson
Environmental Review Officer
for
Rich Hillis
Director of Planning

DATE October 18, 2023

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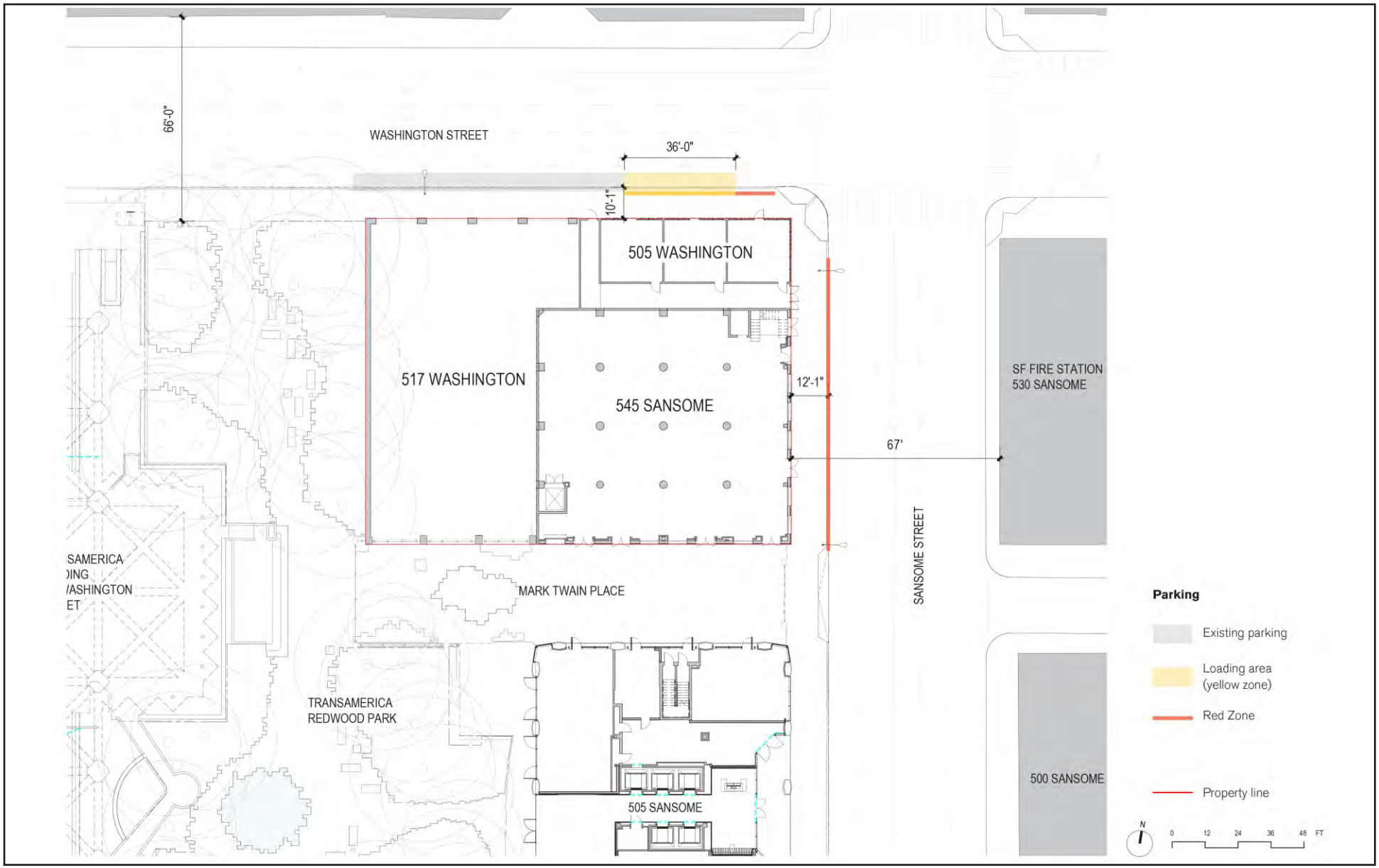
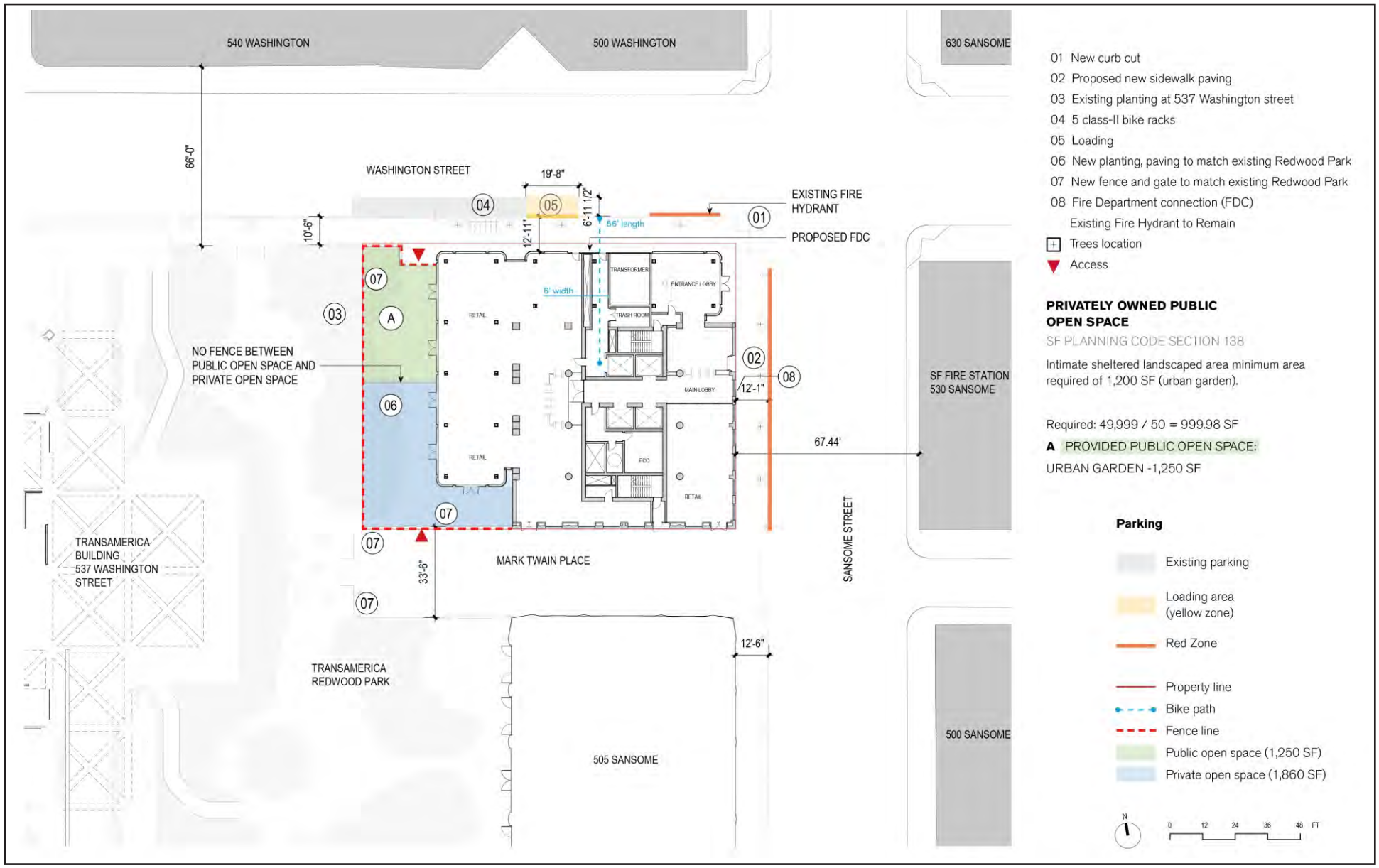


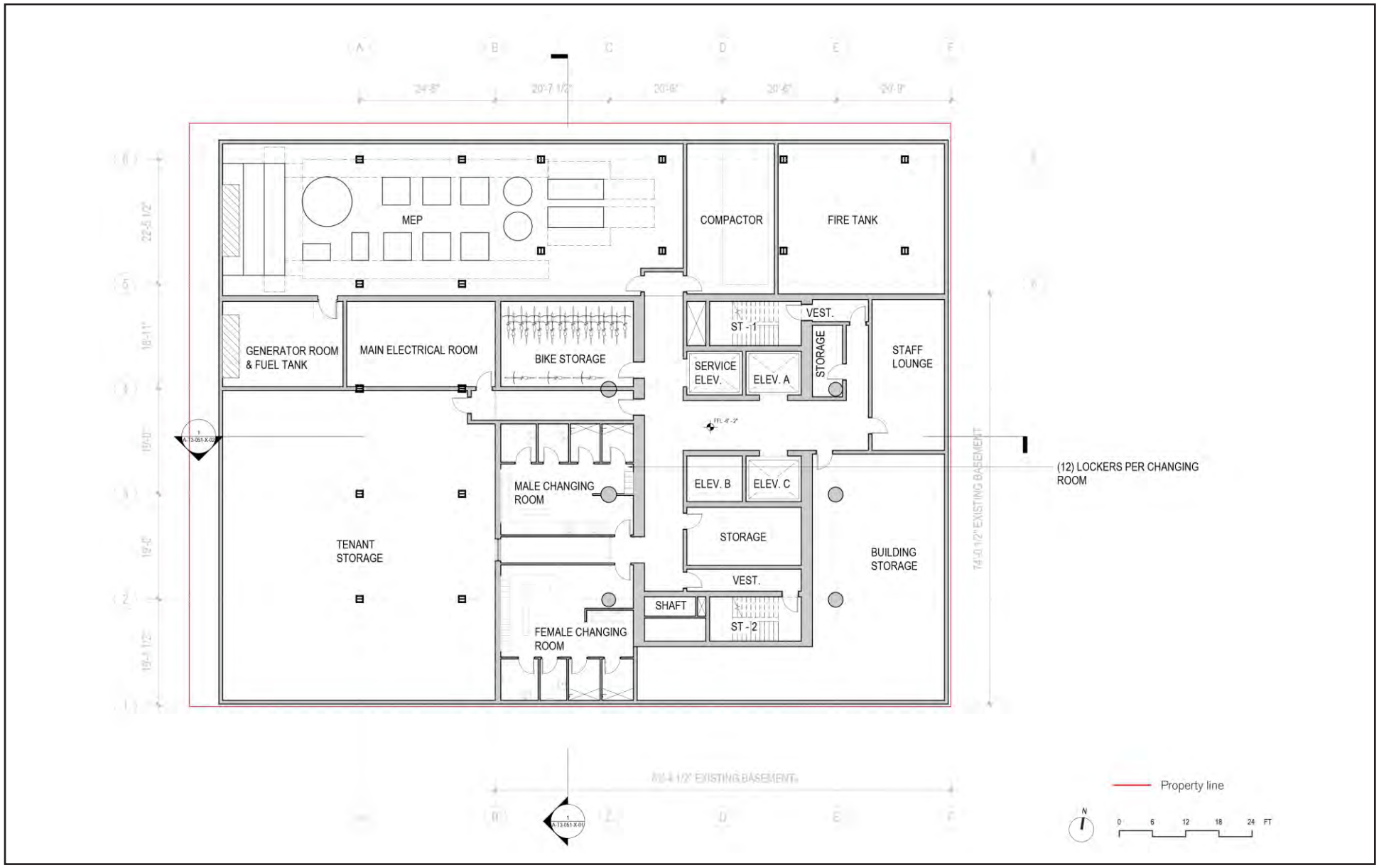
Source: SHVO Foster + Partners, September 14th, 2023.

Figure 4
Existing Site Plan



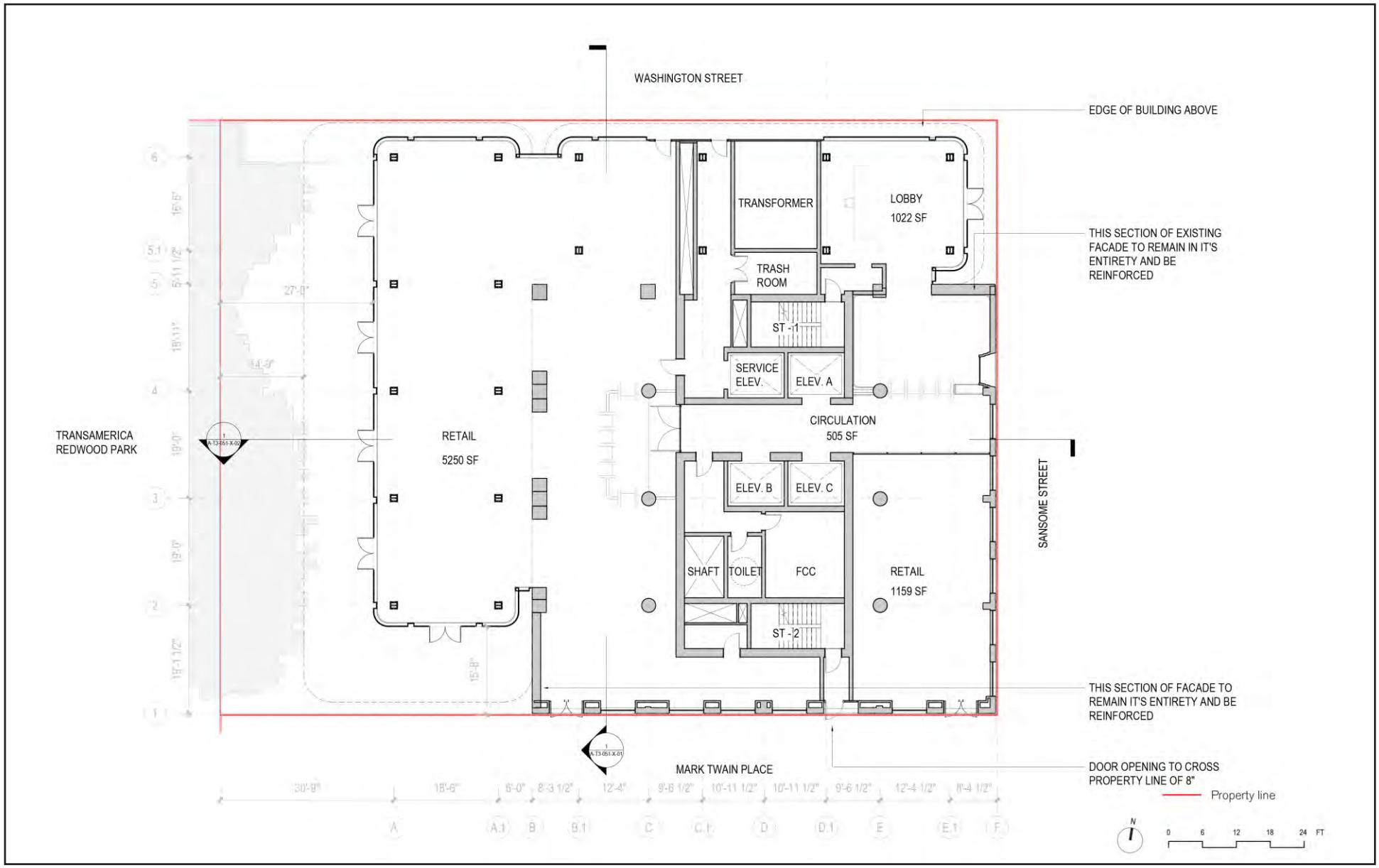
Source: SHVO Foster + Partners, September 14th, 2023.

Figure 5
Proposed Site Plan



SHVO Foster + Partners, September 14th, 2023.

Figure 6.1
Basement Level



SHVO Foster + Partners, September 14th, 2023.

Figure 6.2
Ground Floor

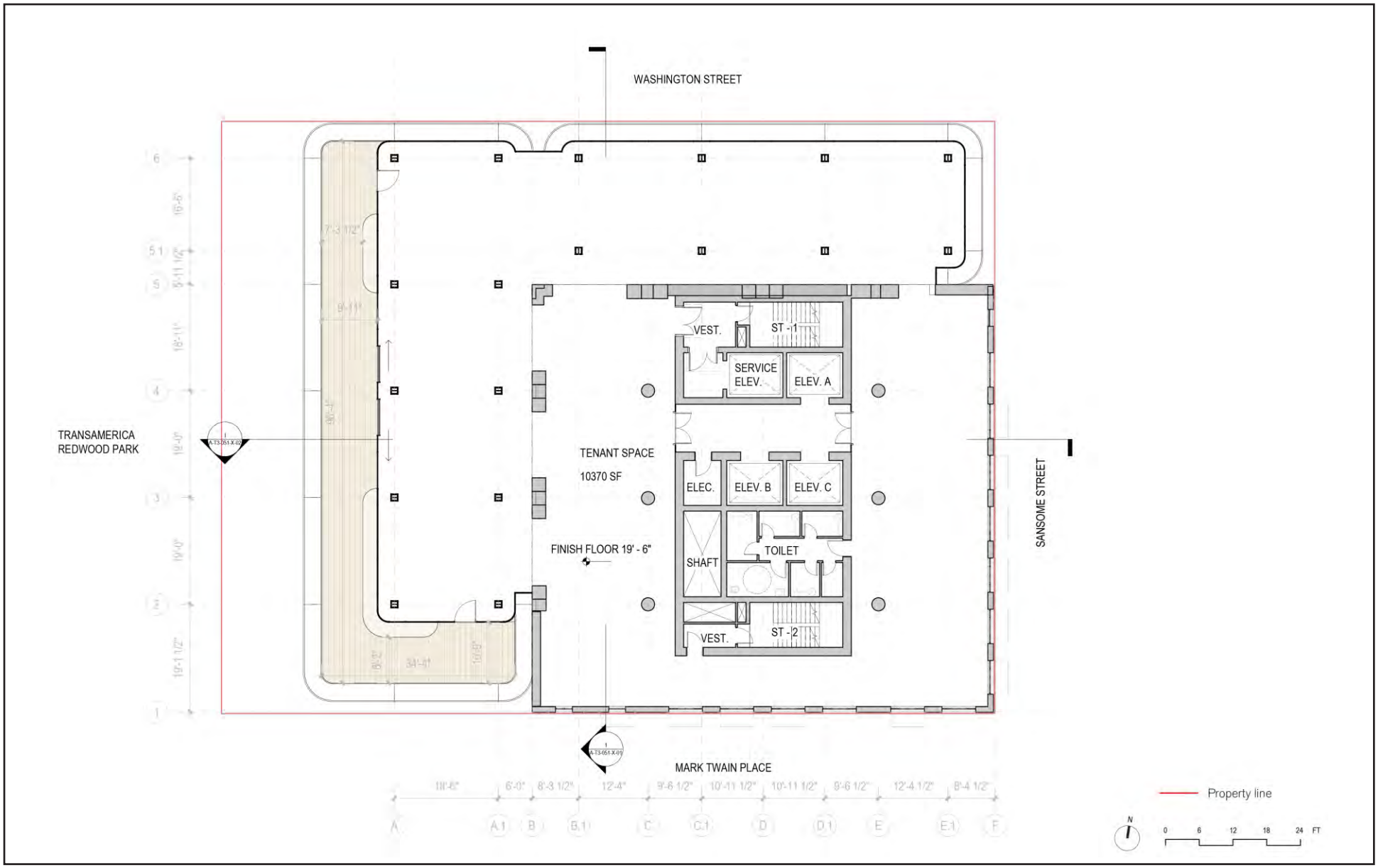


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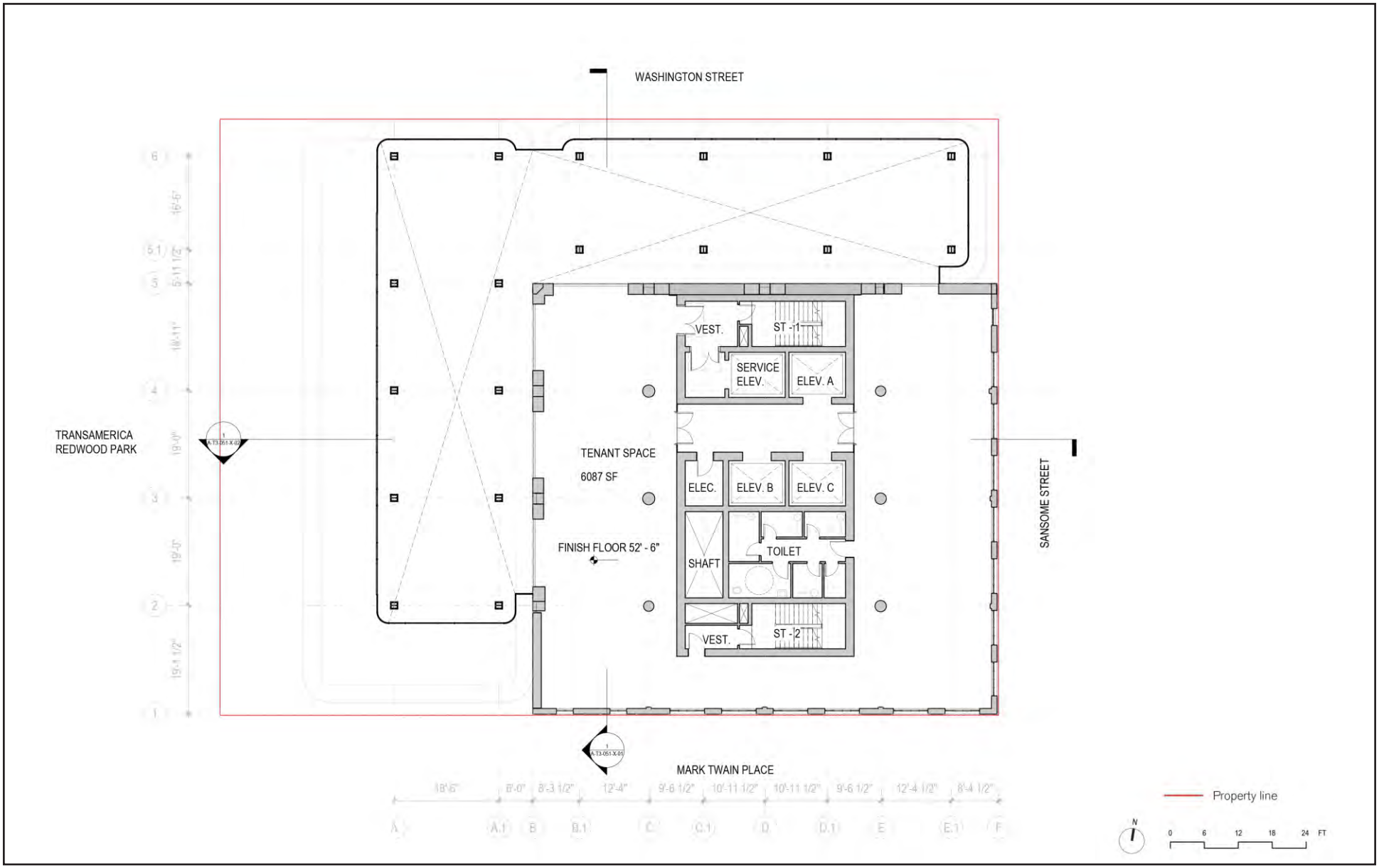
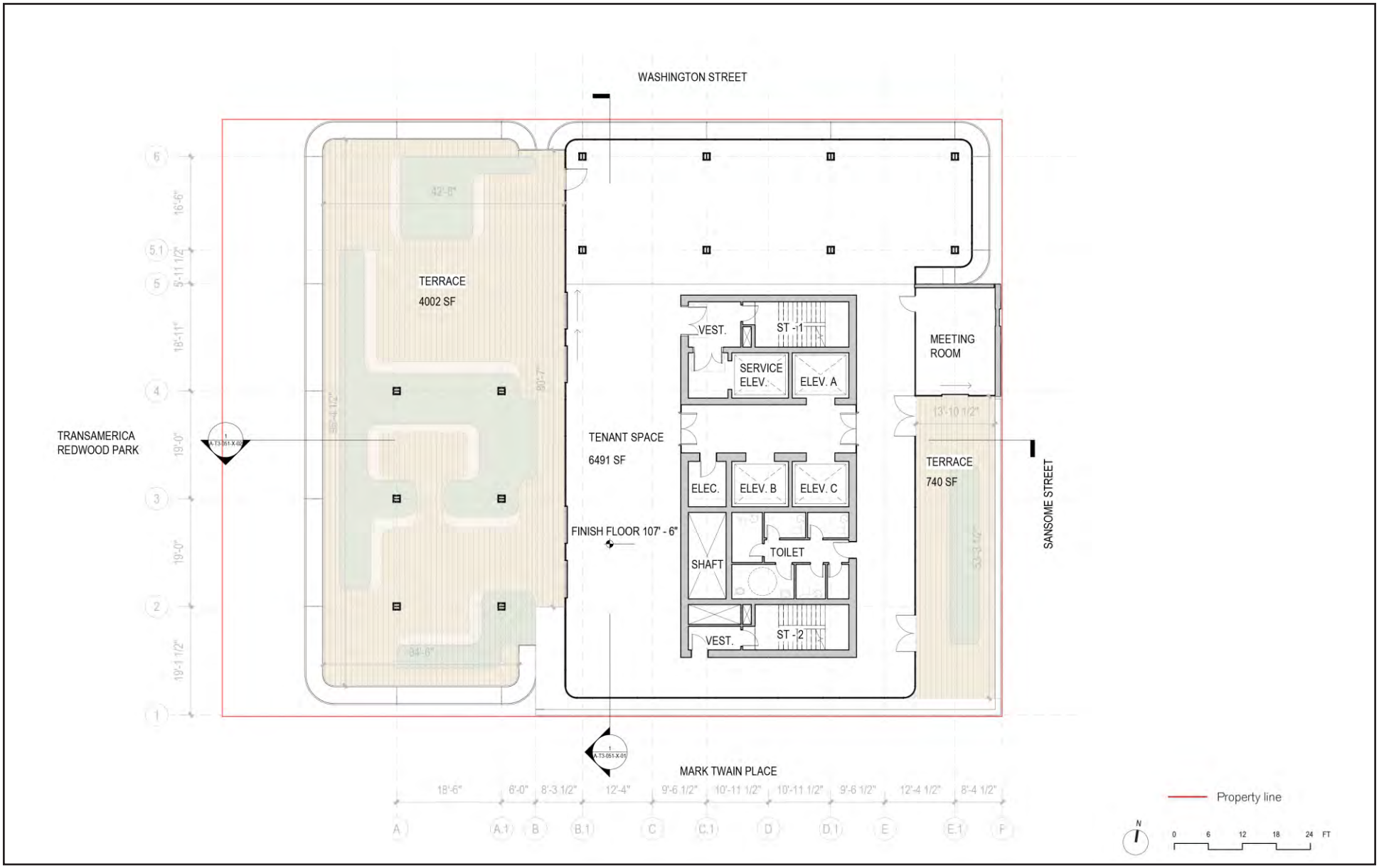
Figure 6.3
Level 2, 3, 5, 7



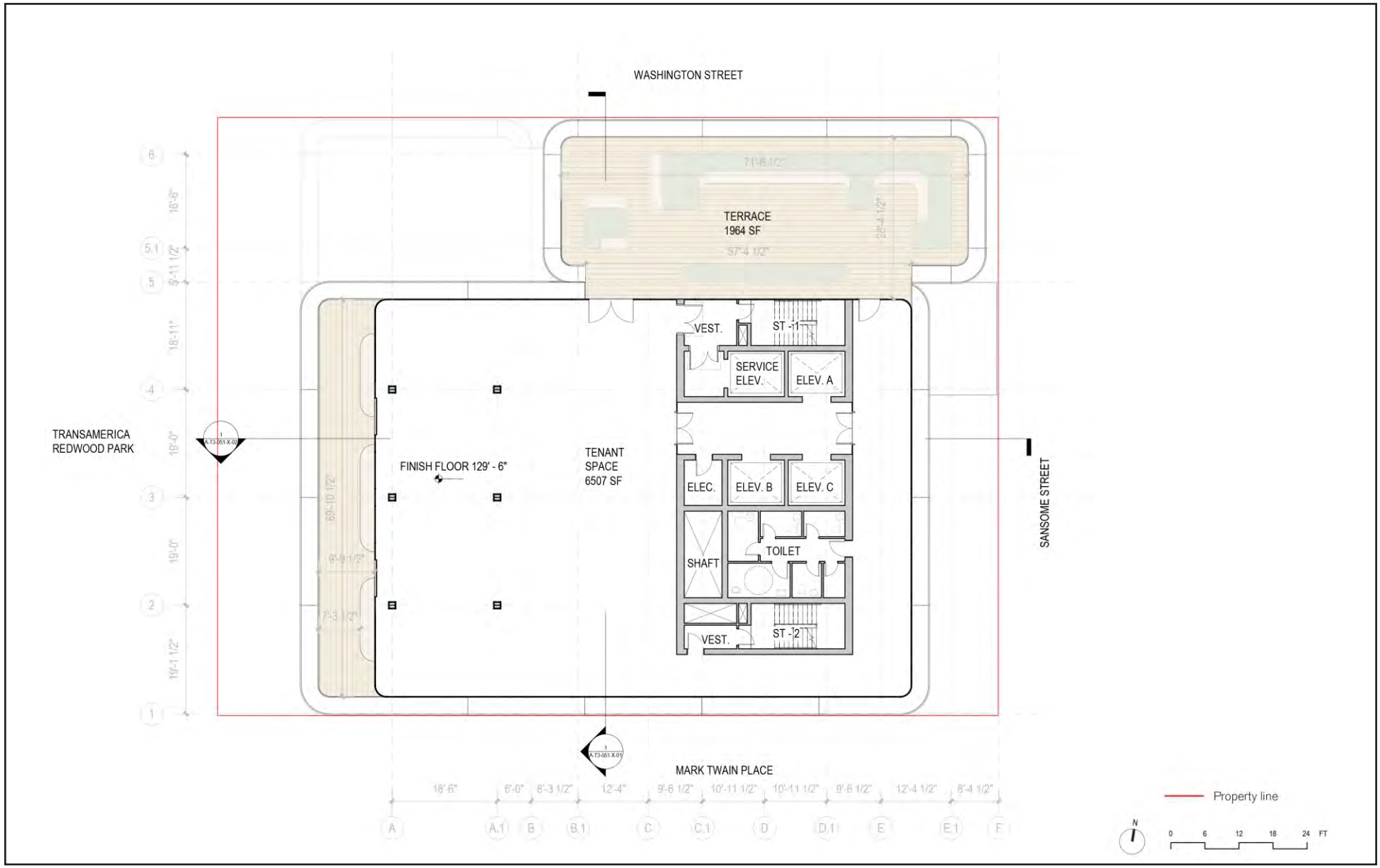
Source: SHVO Foster + Partners, September 14th, 2023.

Figure 6.4
Level 4, 6, 8



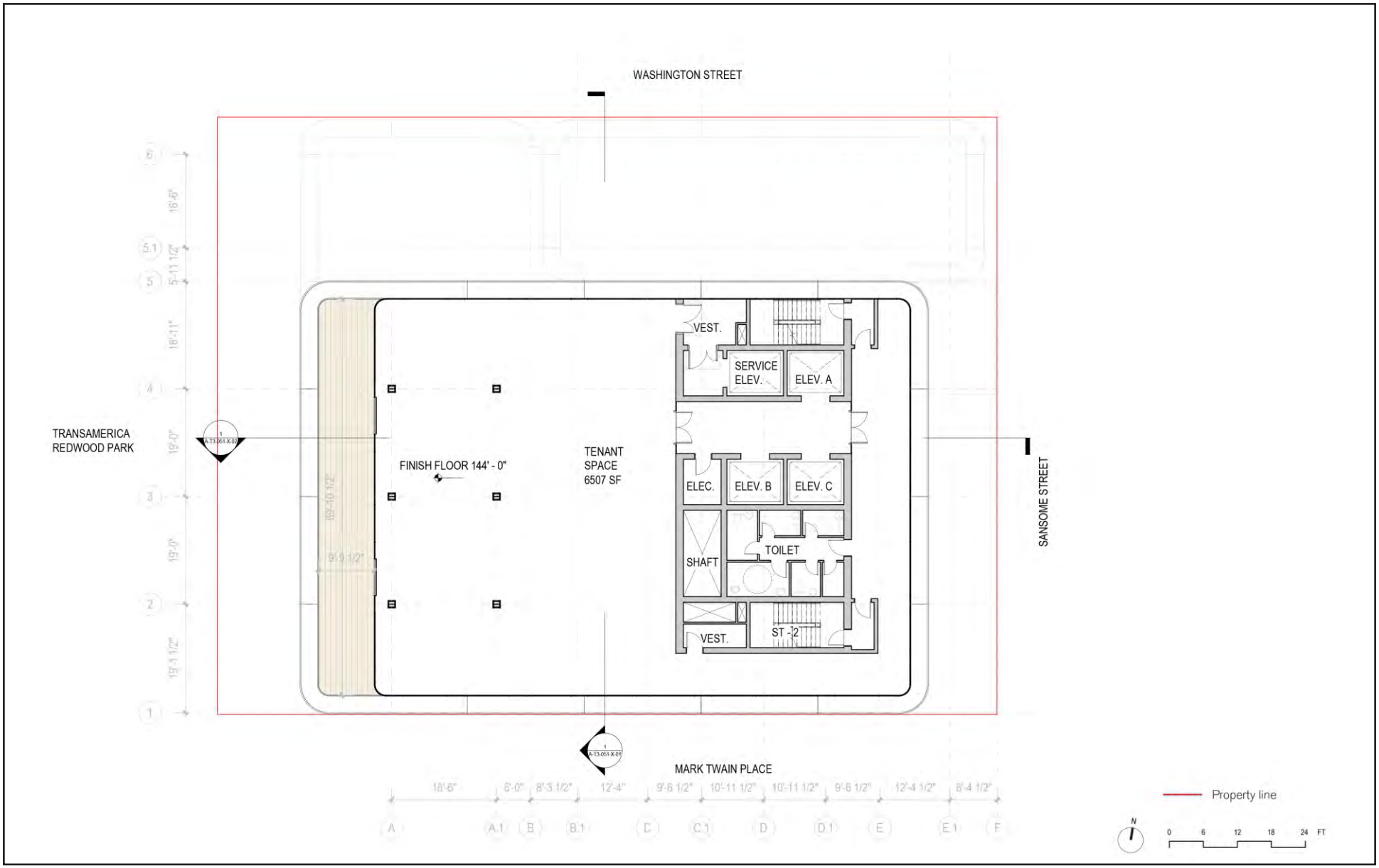
Source: SHVO Foster + Partners, September 14th, 2023.

Figure 6.5
Level 9



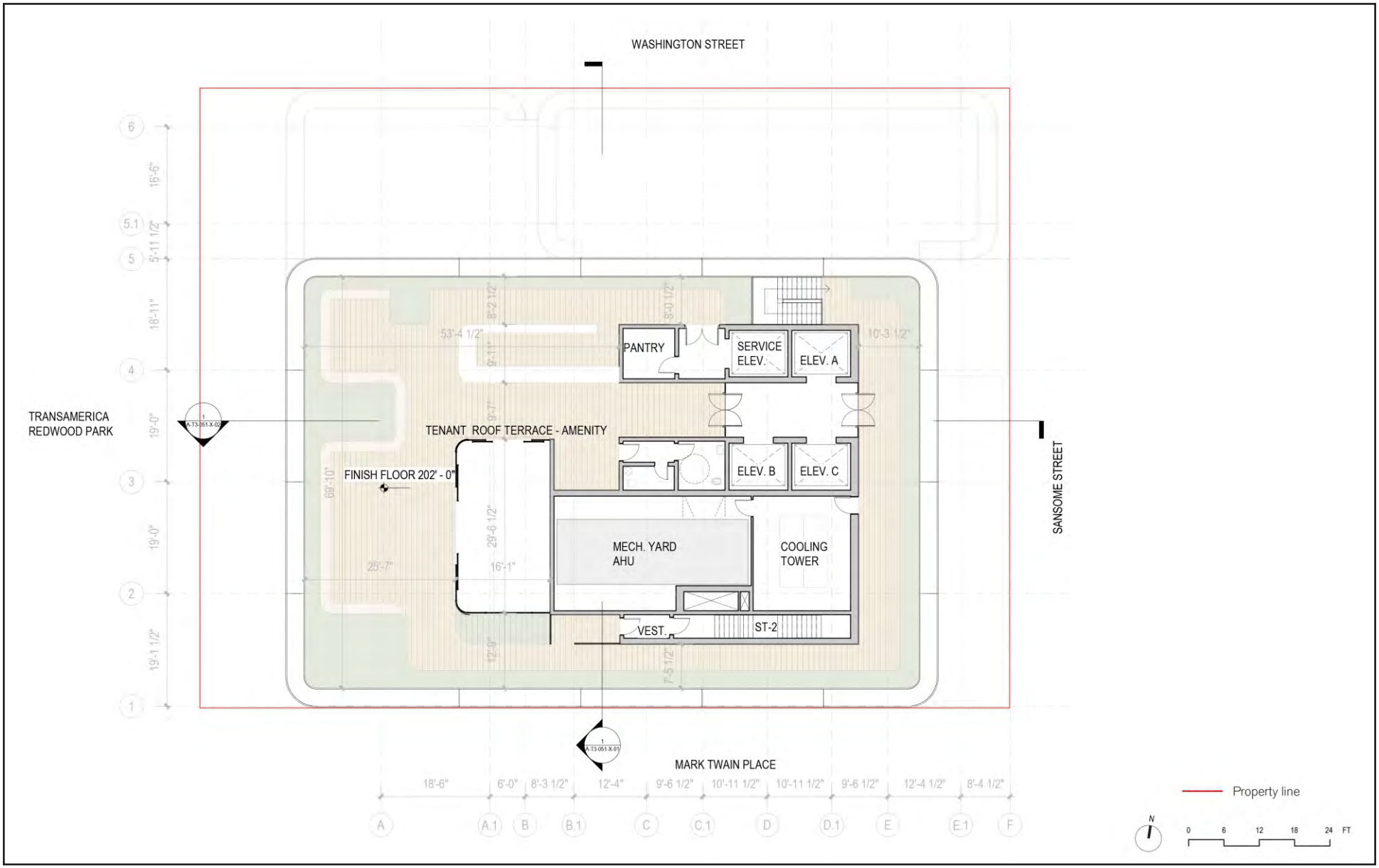
Source: SHVO Foster + Partners, September 14th, 2023.

Figure 6.6
Level 10



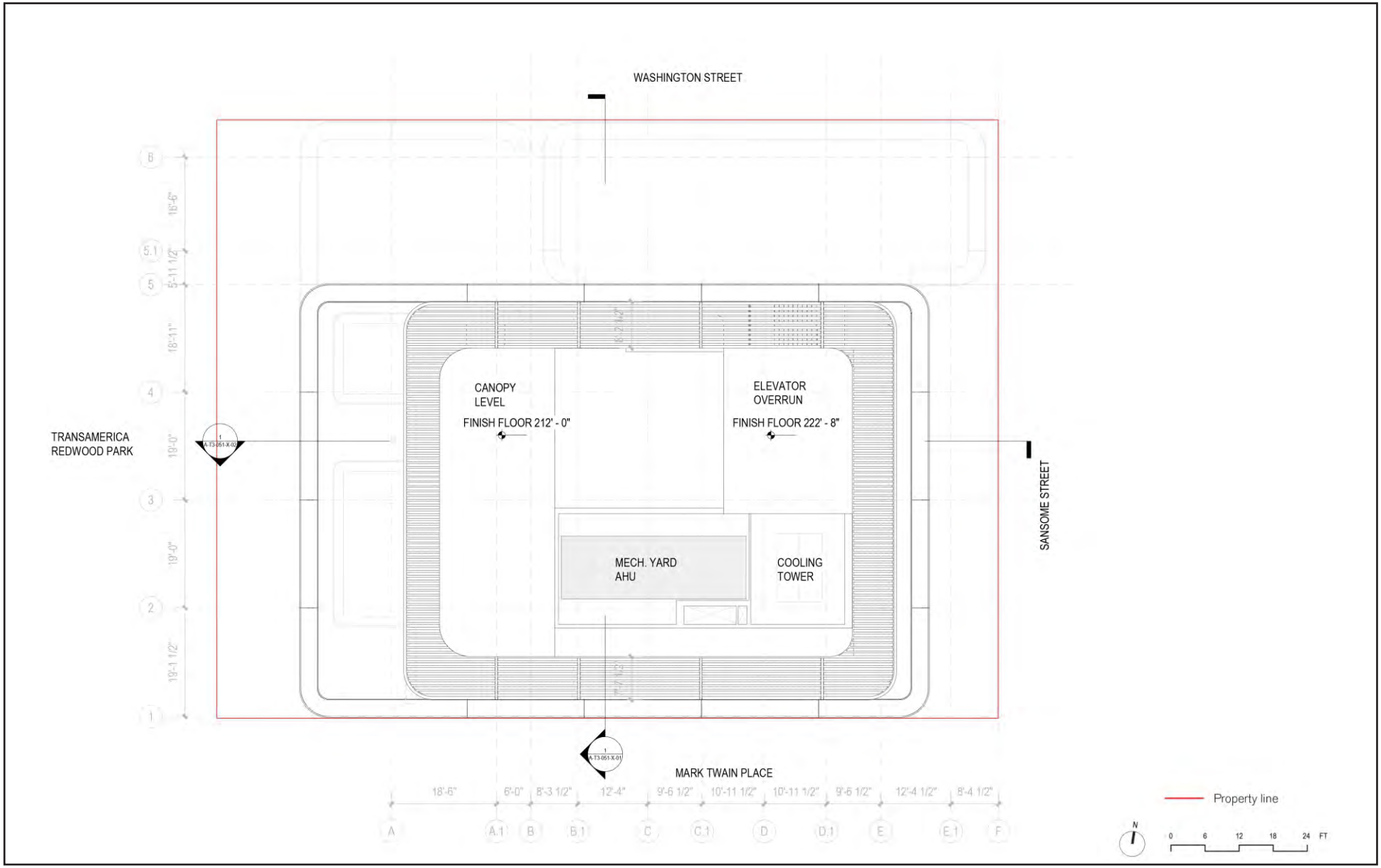
Source: SHVO Foster + Partners, September 14th, 2023.

Figure 6.7
Level 11 - 14



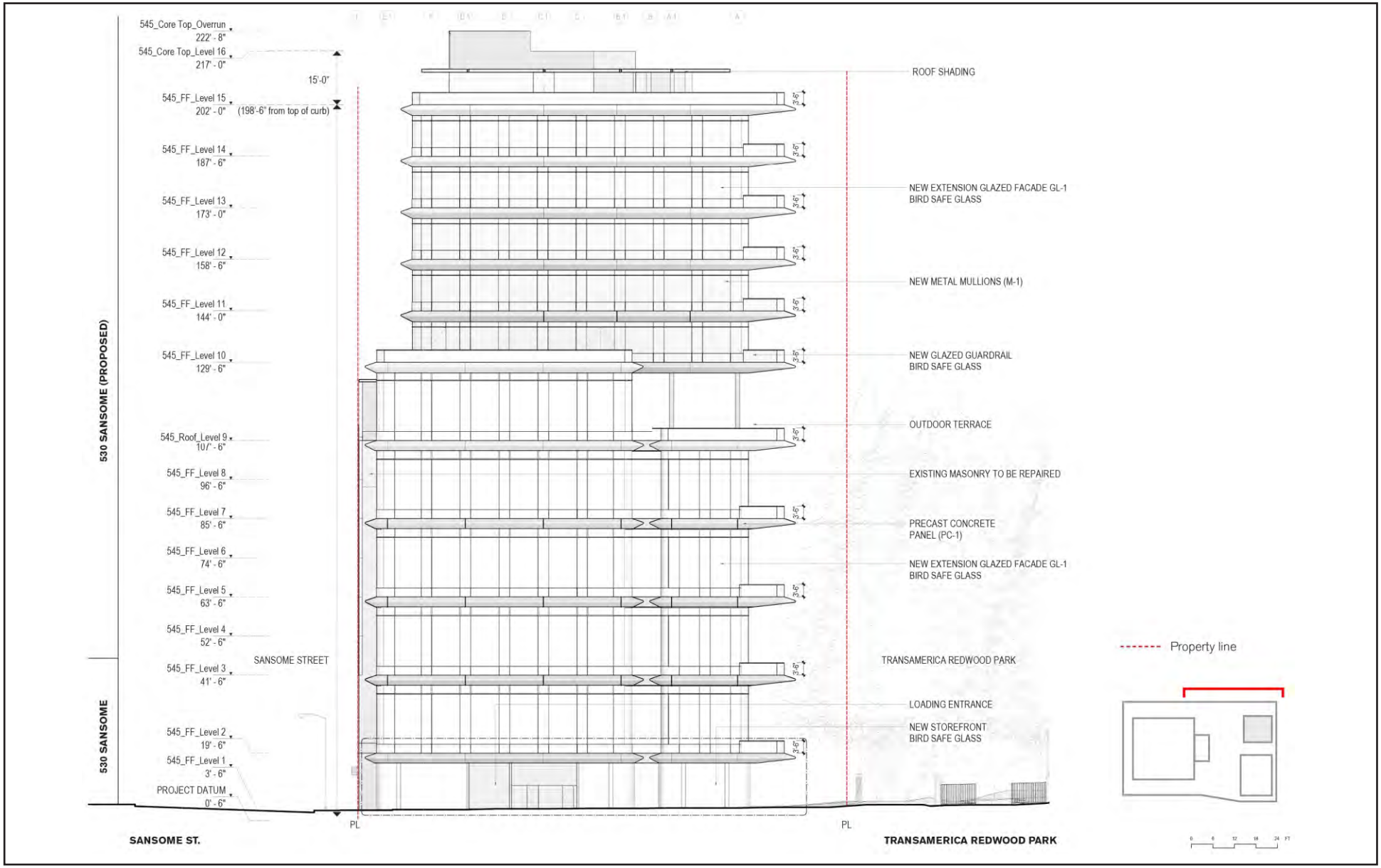
Source: SHVO Foster + Partners, September 14th, 2023.

Figure 6.8
Level 15



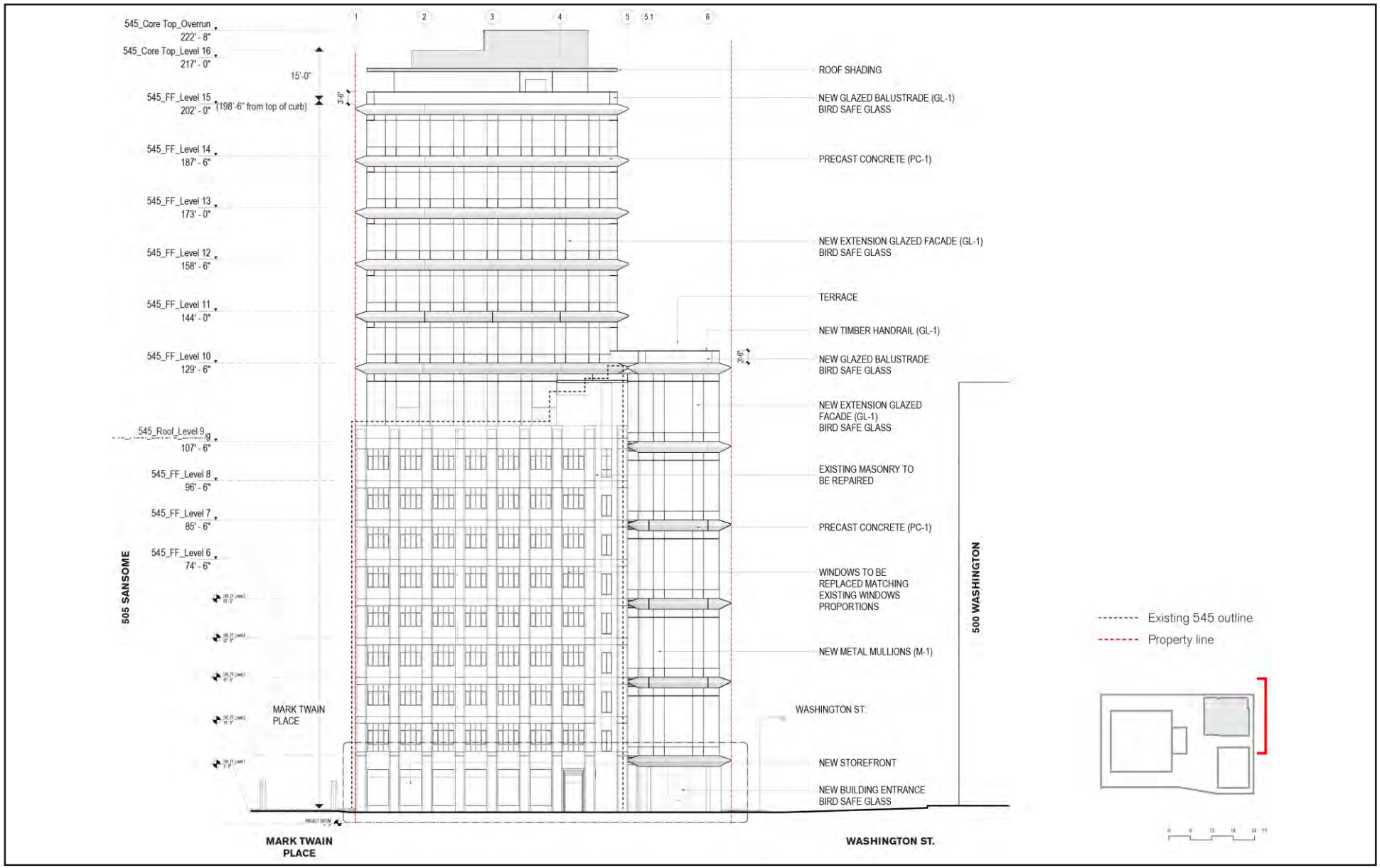
Source: SHVO Foster + Partners, September 14th, 2023.

Figure 6.9
Roof Plan



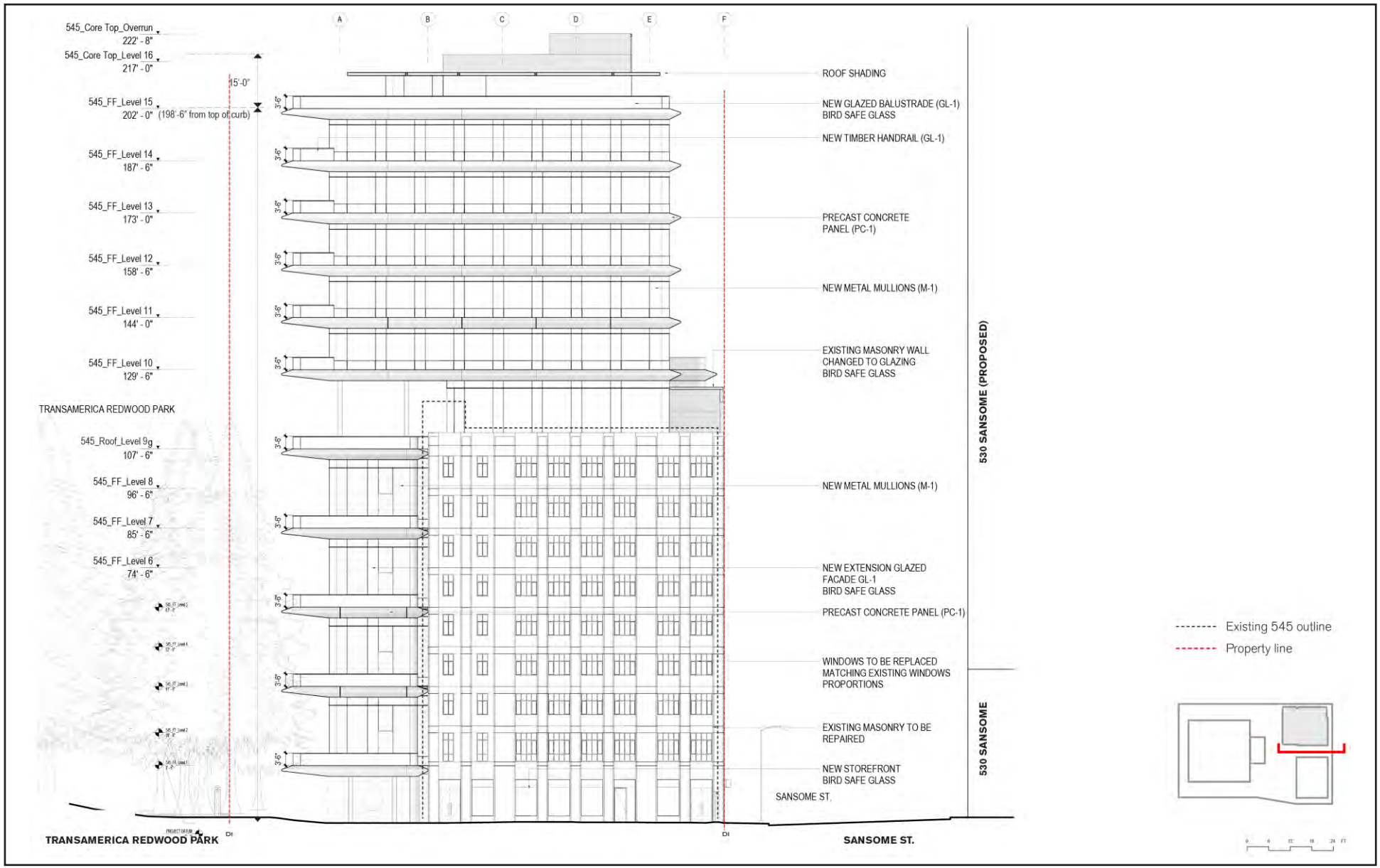
Source: SHVO Foster + Partners, September 14th, 2023.

Figure 7.1
Proposed North Elevation



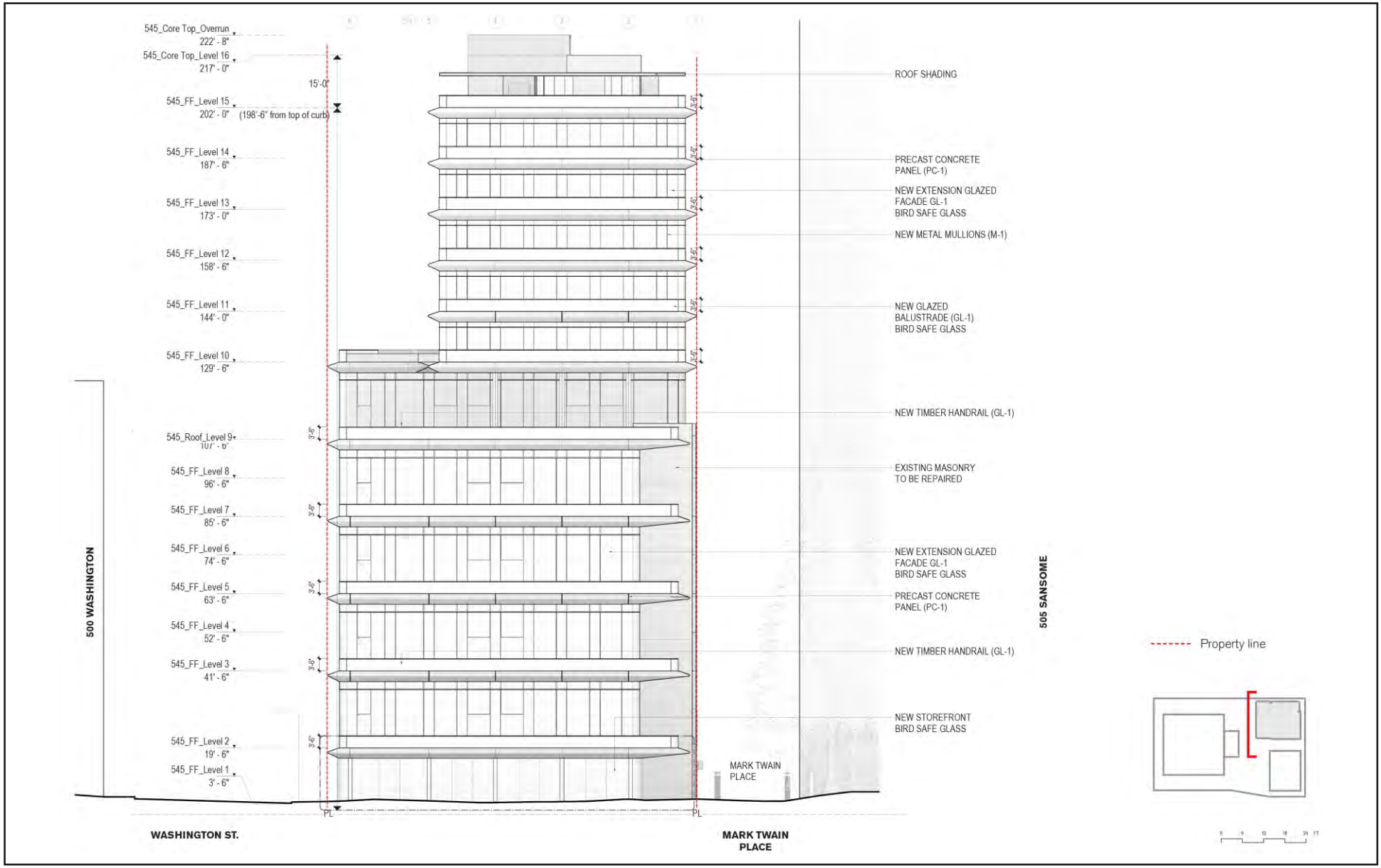
Source: SHVO Foster + Partners, September 14th, 2023.

Figure 7.2
Proposed East Elevation



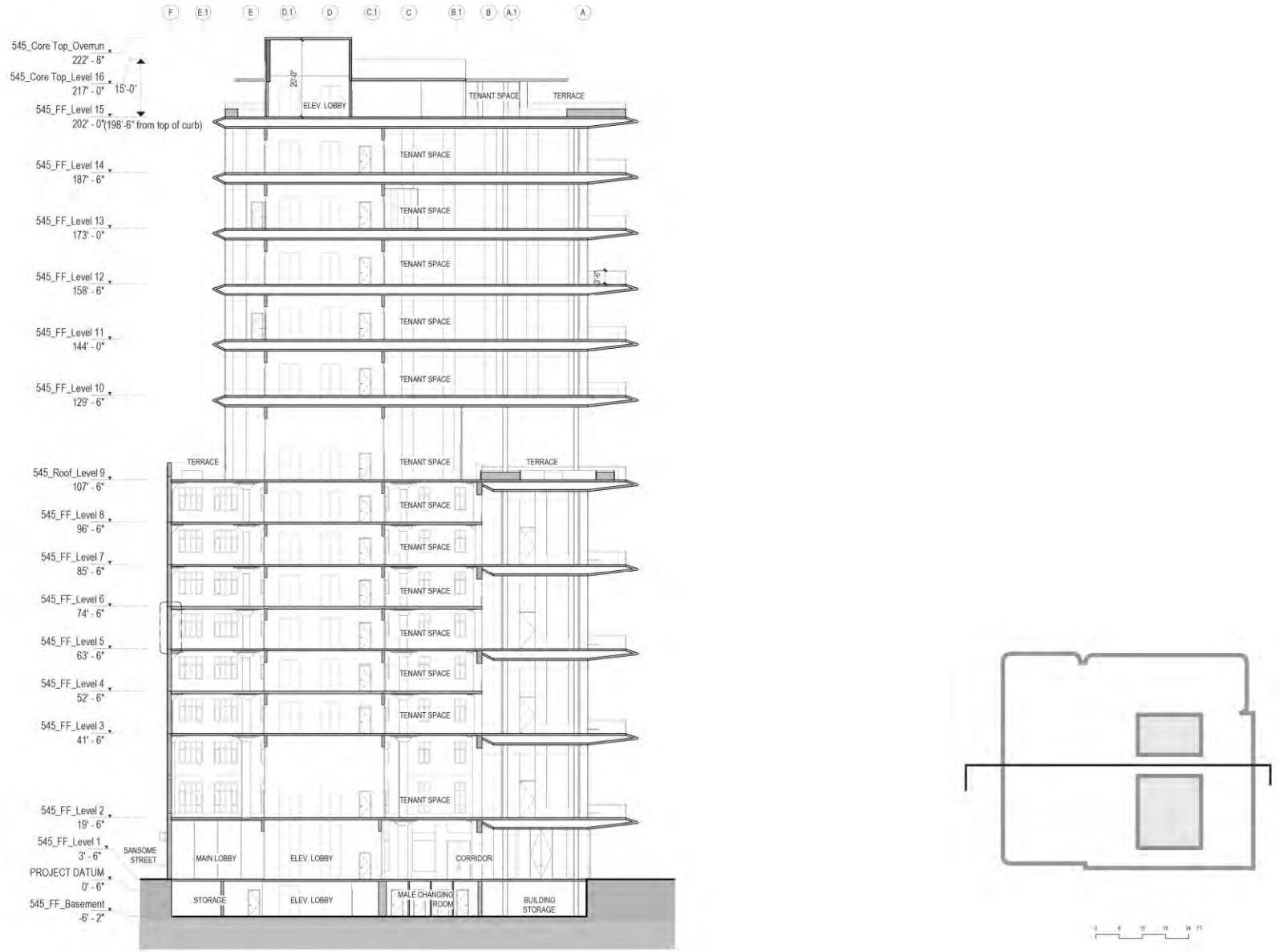
Source: SHVO Foster + Partners, September 14th, 2023.

Figure 7.3
Proposed South Elevation



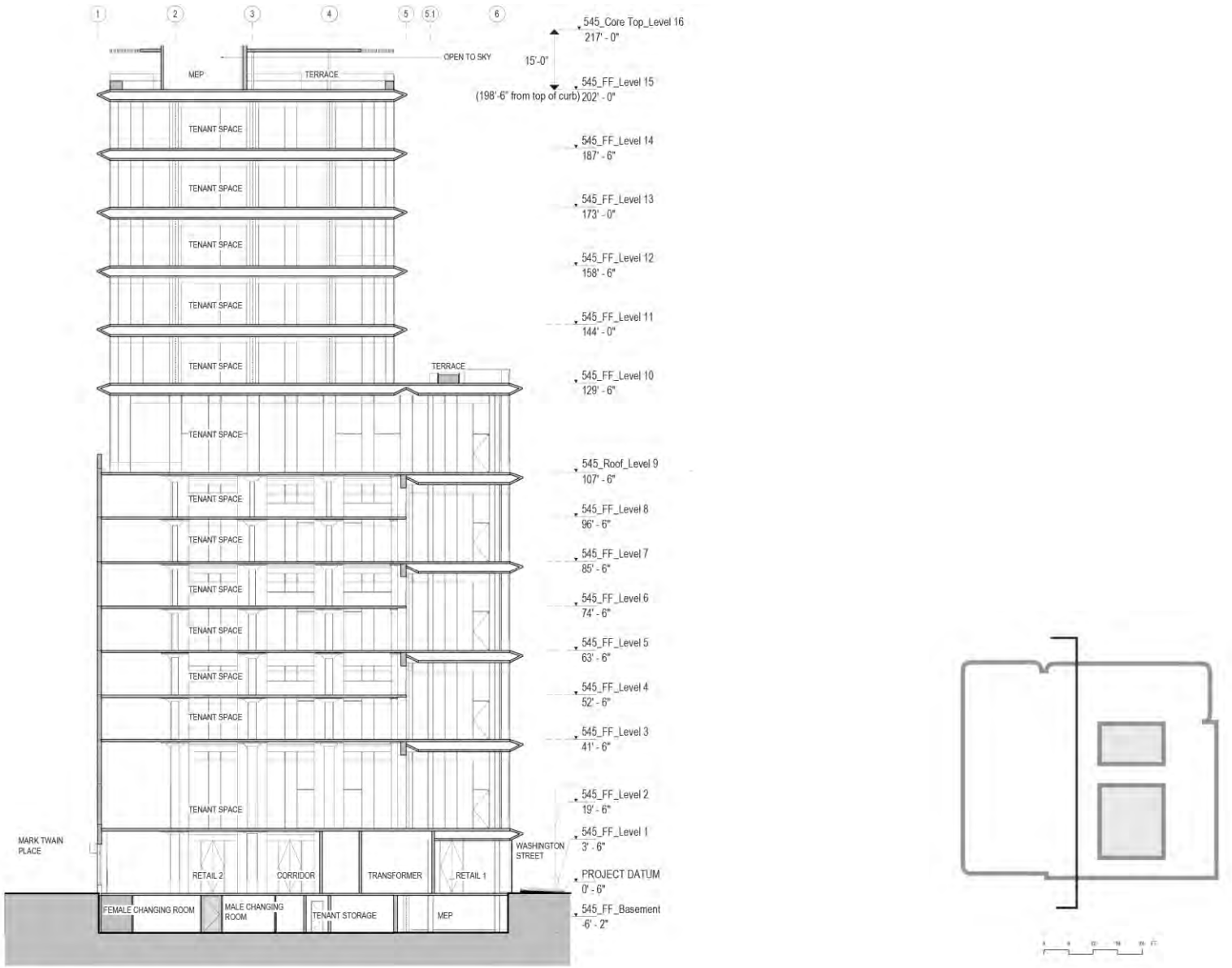
Source: SHVO Foster + Partners, September 14th, 2023.

Figure 7.4
Proposed West Elevation



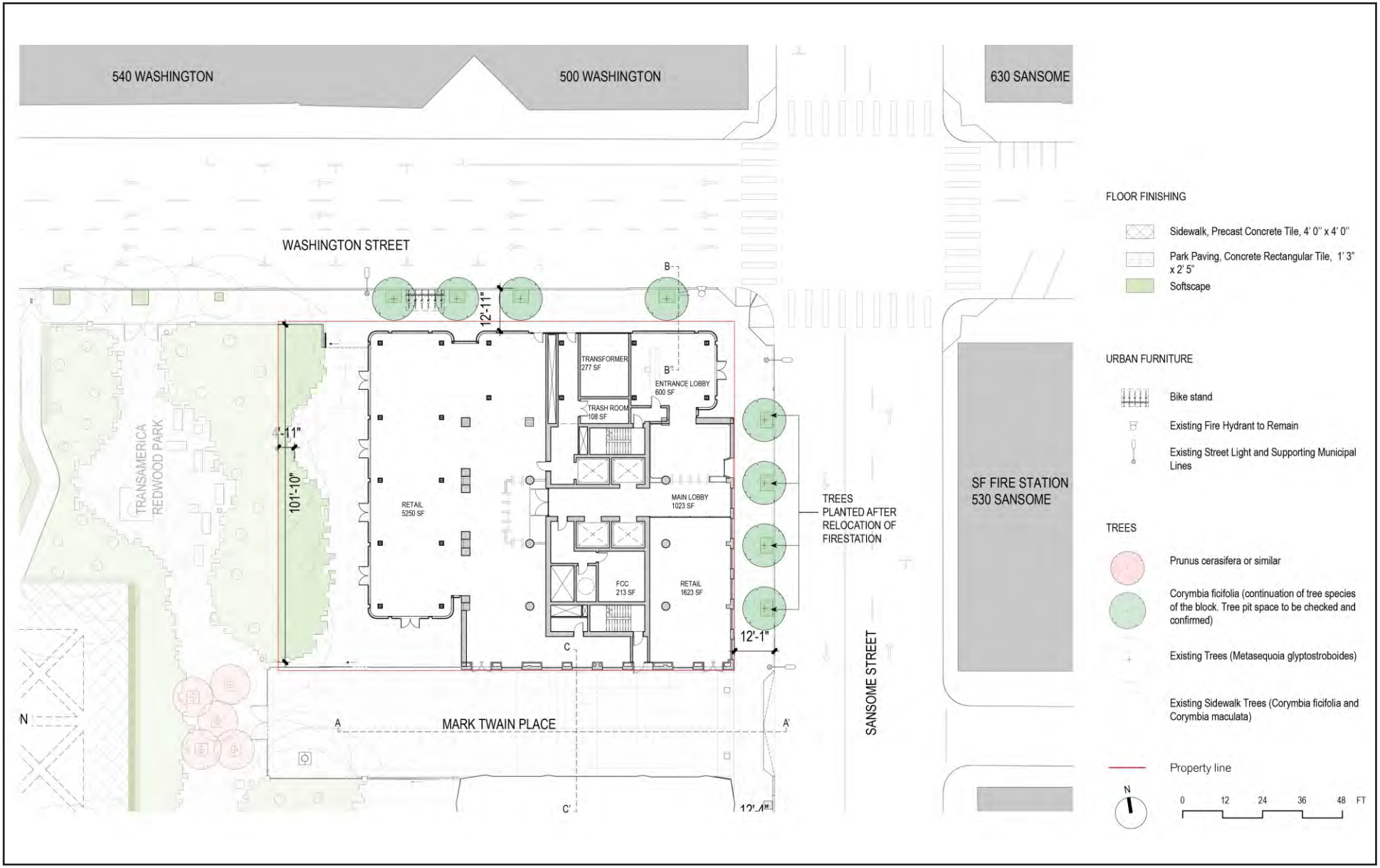
Source: SHVO Foster + Partners, September 14th, 2023.

Figure 8
Proposed E/W Building Section



Source: SHVO Foster + Partners, September 14th, 2023.

Figure 9
Proposed N/S Building Section



Source: SHVO Foster + Partners, November 16th, 2022.

Figure 10
Landscape Plan

ATTACHMENT B

MITIGATION MONITORING AND REPORTING PROGRAM

545 Sansome Street Project
Planning Department Case No. 2020-001410ENV

ATTACHMENT B

San Francisco Planning

AGREEMENT TO IMPLEMENT MITIGATION MONITORING AND REPORTING PROGRAM

Record No.:	2020.0014ENV	*Block/Lot:*	0207/035 and 0207/036
Project Title:	545 Sansome Street	*Lot Size:*	14,480 square feet
Zoning:	C-3-O (Downtown Office) Use District 200-S Height and Bulk District	*Project Sponsor:*	Chloe Angelis, 415.567.9000
		Lead Agency:	San Francisco Planning Department
		Staff Contact:	Ryan Shum, 628.652.7542

The table below indicates when compliance with each mitigation measure must occur. Some mitigation measures span multiple phases. Substantive descriptions of each mitigation measure's requirements are provided on the following pages in the Mitigation Monitoring and Reporting Program (MMRP).

Adopted Mitigation Measure	Period of Compliance			Compliance with Mitigation Measure Completed?
	Prior to the Start of Construction*	During Construction**	Post-construction or Operational	
Mitigation Measure M-CR-1: Exterior Surface Repair, Cleaning, and Painting	X	X		
Mitigation Measure M-CR-2: Archaeological Testing	X	X		
Mitigation Measure M-GE-5a: Pre-construction Paleontological Evaluation	X			
Mitigation Measure M-GE-5b: Worker Environmental Awareness Training during Ground-Disturbing Construction	X	X		
Mitigation Measure M-GE-5c: Discovery of Unanticipated Paleontological Resources during Ground-Disturbing Construction		X		

NOTES:
* Prior to any ground disturbing activities at the project site.
** Construction is broadly defined to include any physical activities associated with construction of a development project including, but not limited to: site preparation, clearing, demolition, excavation, shoring, foundation installation, and building construction.

I agree to implement the attached mitigation measure(s) as a condition of project approval.

Property Owner or Legal Agent Signature

September 28, 2023

Date

Note to sponsor: Please contact CPC.EnvironmentalMonitoring@sfgov.org to begin the environmental monitoring process prior to the submittal of your building permits to the San Francisco Department Building Inspection.

MITIGATION MONITORING AND REPORTING PROGRAM

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
MITIGATION MEASURES AGREED TO BY PROJECT SPONSOR				
CULTURAL RESOURCES				
Mitigation Measure M-CR-1: Exterior Surface Repair, Cleaning, and Painting The project sponsor shall hire a qualified architectural conservation professional to identify and prepare specifications for exterior surface repairs and patching of historic concrete as well as cleaning methods and painting specifications. These specifications shall ensure that methods used in cleaning, painting, and/or repairing any exterior surfaces through chemical or physical treatments are found to be the gentlest possible to the historical resource, in accordance with Standard 7 of the Secretary of Interior's Standards for Rehabilitation. Specifications established by the qualified architectural conservation professional shall be subject to review and approval by planning department preservation staff prior to issuance of the architectural addendum to the site permit.	Project sponsor and archaeological conservation professional, subject to San Francisco planning department review and approval.	Prior to issuance of construction permits and throughout the construction period.	Planning department Preservation Staff	Considered complete after implementation of approved specifications for exterior surface repair, cleaning, and painting of historic concrete.
Mitigation Measure M-CR-2 Archaeological Testing Based on a reasonable potential that archaeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effects from the proposed project on buried or submerged historical resources. Archaeological Testing Program. The purpose of the archaeological testing program will be to determine to the extent possible the presence or absence of archaeological resources and to identify and to evaluate whether any	Project sponsor and ERO	Prior to issuance of construction permits	Planning department (ERO, cultural resources staff)	Complete when project sponsor retains qualified archaeological consultant.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
archaeological resource encountered on the site constitutes an historical resource under CEQA. The project sponsor shall retain the services of an archaeological consultant from the rotational Qualified Archaeological Consultants List (QACL) maintained by the planning department. After the first project approval action or as directed by the Environmental Review Officer (ERO), the project sponsor shall contact the department archaeologist to obtain the names and contact information for the next three archaeological consultants on the QACL. The archaeological consultant shall undertake an archaeological testing program as specified herein. The archaeological consultant's work shall be conducted in accordance with this measure at the direction of the ERO. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment and shall be considered draft reports subject to revision until final approval by the ERO. In addition, the consultant shall be available to conduct an archaeological monitoring and/or data recovery program if required pursuant to this measure. Archaeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archaeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c).				
Archaeological Testing Plan. The archaeological testing program shall be conducted in accordance with the approved Archaeological Testing Plan (ATP). The archaeological consultant and the ERO shall consult on the scope of the ATP, which shall be approved by the ERO prior to any project-related soils disturbing activities commencing. The ATP shall	Project sponsor's qualified archaeological consultant and construction	Prior to issuance of construction permits and throughout the construction period	Planning department (ERO, cultural resources staff).	Considered complete after implementation of approved ATP.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
be submitted first and directly to the ERO for review and comment and shall be considered a draft subject to revision until final approval by the ERO. The archaeologist shall implement the testing as specified in the approved ATP prior to and/or during construction. The ATP shall identify the property types of the expected archaeological resource(s) that potentially could be adversely affected by the proposed project, lay out what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. The ATP shall also identify the testing method to be used, the depth or horizonal extent of testing, and the locations recommended for testing and shall identify archaeological monitoring requirements for construction soil disturbance as warranted.	contractor, project sponsor			
<u>Construction Crew Archaeological Awareness.</u> Prior to any soils-disturbing activities being undertaken, the project archaeologist shall conduct a brief on-site archaeological awareness training that describes the types of resources that might be encountered and how they might be recognized, and requirements and procedures for work stoppage, resource protection and notification in the event of a potential archaeological discovery. The project archaeologist also shall distribute an "Alert" wallet card, based on the department's "ALERT" sheet, that summarizes stop work requirements and provides necessary contact information for the project archaeologist, project sponsor and the to all field personnel involved in soil disturbing activities, including machine operators, field crew, pile drivers, supervisory personnel, etc., have received. The project archaeologist shall repeat the training at intervals during construction, as determined necessary by the ERO, including when new construction	Project archaeologist for awareness training, Native American representative for Native American cultural resources sensitivity training (if requested)	Prior to any soil disturbing activity	Planning department (ERO, cultural resources staff)	Considered complete after implementation of approved ATP.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
personnel start work and prior to periods of soil disturbing work when the project archaeologist will not be on-site. Tribal Cultural Resources Sensitivity Training. In addition to and concurrently with the archaeological awareness training, the project sponsor shall ensure that a local Native American representative is afforded the opportunity to provide a Native American cultural resources sensitivity training to all construction personnel.				
Native American Archaeological Deposits and Tribal Notification. All Native American archaeological deposits shall be assumed to be significant unless determined otherwise in consultation with the ERO. If a Native American archaeological deposit is encountered, soil disturbing work shall be halted as detailed above. In addition, the ERO shall notify any tribal representatives who, in response to the project tribal cultural resource notification, requested to be notified of discovery of Native American archaeological resources in order to coordinate on the treatment of archaeological and tribal cultural resources. Further the project archaeologist shall offer a Native American representative the opportunity to monitor any subsequent soil disturbing activity that could affect the find.	Project sponsor, Archaeological consultant/Project archaeologist and ERO	During soils disturbing activities if Native American archaeological resources are encountered	Planning department (ERO, cultural resources staff)	Considered complete when Native American representatives respond to notice or conduct monitoring
Paleoenvironmental Analysis of Paleosols. When a submerged paleosol is identified during monitoring, irrespective of whether cultural material is present, samples shall be extracted and processed for dating, flotation for paleobotanical analysis, and other applicable special analyses pertinent to identification of possible cultural soils and for environmental reconstruction. The results of analysis of collected samples shall be reported on in results reports. If important information about past environmental conditions is discovered during coring and analysis, this information shall	Archaeological consultant, project sponsor	During construction	Planning department (ERO, cultural resources staff)	Considered complete when samples are collected, processed, and analyzed

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
be presented to the public in the form of interpretive materials, such as panels, installed in a public area at the project location.				
Discovery Treatment Determination. At the completion of the archaeological testing program, the archaeological consultant shall submit a written summary of the findings to the ERO. The findings memo shall describe and identify each resource and provide an initial assessment of the integrity and significance of encountered archaeological deposits. If the ERO in consultation with the archaeological consultant determines that a significant archaeological resource is present and that the resource could be adversely affected by the proposed project, the ERO, in consultation with the project sponsor, shall determine whether preservation of the resource in place is feasible. In the event of the discovery of a tribal cultural resource, the ERO, the project sponsor, and the local Native American representative, shall consult to determine whether preservation in place would be feasible and effective. Coordination shall take place with local Native American representatives, including the Association of Ramaytush Ohlone and other interested Ohlone parties. If so, the proposed project shall be re-designed so as to avoid any adverse effect on the significant archaeological resource and the archaeological consultant shall prepare a cultural resource preservation plan (CRPP), which shall be implemented by the project sponsor during construction. The consultant shall submit a draft CRPP to the planning department for review and approval. If preservation in place is not feasible, a data recovery program shall be implemented, unless the ERO determines that the archaeological resource is of greater interpretive than research significance and that interpretive use of the resource is	Archaeological consultant, project sponsor and ERO	During construction	Planning department (ERO, cultural resources staff)	Considered completed after review and approval of archaeological testing results memo by ERO; or CRPP is approve; or it's determined that treatment is needed

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
feasible. The ERO in consultation with the archaeological consultant shall also determine if additional treatment is warranted, which may include additional testing and/or construction monitoring.				
Consultation with Descendant Communities. On discovery of an archaeological site associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group an appropriate representative of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archaeological field investigations of the site and to offer recommendations to the ERO regarding appropriate archaeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archaeological site. The ERO and project sponsor shall work with the tribal representative or other representatives of descendant communities to identify the scope of work to fulfill the requirements of this mitigation measure, which may include participation in preparation and review of deliverables (e.g., plans, interpretive materials, artwork). Representatives shall be compensated for their work as identified in the agreed upon scope of work. A copy of the Archaeological Resources Report (ARR) shall be provided to the representative of the descendant group. Compensation. Following on the initial tribal consultation, the ERO, project sponsor and project archaeologist, as appropriate, shall work with the tribal representative or other descendant or descendant community representatives to identify the scope of work for a representative to fulfill the requirements of this mitigation measure, which may include participation in archaeological monitoring, preparation and review of deliverables (e.g., plans, interpretive materials, artwork). Tribal representatives or other descendant	Archaeological consultant, descendant group, project sponsor, and ERO	After discovery of significant resource associated with a descendant group	Planning department (ERO, cultural resources staff)	Considered completed after descendant group has received ARR and been compensated for work on deliverables.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
community representatives for archaeological resources or tribal cultural resources, who complete tasks in the agreed upon scope of work project, shall be compensated for their work as identified in the agreed upon scope of work.				
Archaeological Data Recovery Plan. An archaeological data recovery program shall be conducted in accordance with an Archaeological Data Recovery Plan (ADRP) if all three of the following apply: 1) a resource has potential to be significant, 2) preservation in place is not feasible, and 3) the ERO determines that an archaeological data recovery program is warranted. The archaeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. If a Native American archaeological resource is discovered consultation on the scope of the ADRP shall include coordination with local Native American tribal representatives. The archaeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archaeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archaeological resources if nondestructive methods are practical. The scope of the ADRP shall include the following elements: • Field Methods and Procedures. Descriptions of proposed field strategies, procedures, and operations.	Project sponsor's qualified archaeological consultant, project sponsor	Upon ERO's determination that data recovery is required in the event an archaeological resource is discovered	Planning department (ERO, cultural resources staff)	Considered complete after ERO's approval of Archaeological Data Recovery Plan.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
• Cataloguing and Laboratory Analysis. Description of selected cataloguing system and artifact analysis procedures. • Discard and Deaccession Policy. Description of and rationale for field and post-field discard and deaccession policies. • Security Measures. Recommended security measures to protect the archaeological resource from vandalism, looting, and non-intentionally damaging activities. • Final Report. Description of proposed report format and distribution of results. • Curation. Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.				
Coordination of Archaeological Data Recovery Investigations. In cases in which the same resource has been or is being affected by another project, such as 530 Sansome Street project (2019-017481), for which data recovery has been conducted, is in progress, or is planned, in order to maximize the scientific and interpretive value of the data recovered from both archaeological investigations, the following measures shall be implemented: a. In cases where neither investigation has not yet begun, both archaeological consultants and the ERO shall consult on coordinating and collaboration on archaeological research design, data recovery methods, analytical methods, reporting, curation, and interpretation to ensure consistent data recovery and treatment of the resource. b. In cases where archaeological data recovery investigation is already under way or has been completed for a prior project, the archaeological consultant for the subsequent project shall consult with the prior archaeological consultant, if available; review prior treatment plans,	Archaeological consultant in consultation with ERO, project sponsor	At initiation of preparation of ADRP	Planning department (ERO, cultural resources staff)	Considered complete approval of Final Archaeological Results Report

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
findings and reporting; and inspect and assess existing archaeological collections/inventories from the site prior to preparation of the archaeological treatment plan for the subsequent discovery, and shall incorporate prior findings in the final report of the subsequent investigation. The objectives of this coordination and review of prior methods and findings will be to identify refined research questions; determine appropriate data recovery methods and analyses; assess new findings relative to prior research findings; and integrate prior findings into subsequent reporting and interpretation.				
Human Remains and Funerary Objects. The treatment of any human remains and funerary objects discovered during any soils disturbing activity shall comply with applicable State laws, including Section 7050.5 of the Health and Safety Code and Public Resources Code 5097.98. If human remains or suspected human remains are encountered during construction, the contractor and project sponsor shall ensure that ground-disturbing work within 50 feet of the remains is halted immediately and shall arrange for the protection in place of the remains until appropriate treatment and disposition have been agreed upon and implemented in accordance with this section. Upon determining that the remains are human, the project archaeologist shall immediately notify the Medical Examiner of the City and County of San Francisco of the find. The archaeologist shall also immediately notify the ERO and the project sponsor of the find. In the event of the Medical Examiner's determination that the human remains are Native American in origin, the Medical Examiner will notify the California State Native American Heritage Commission (NAHC) within 24 hours. The NAHC will immediately appoint and notify a Most Likely Descendant (MLD). The MLD will complete his or her inspection of the	Project sponsor/ archaeological consultant in consultation with the ERO, Medical Examiner, NAHC, and MLD as warranted	In the event that human remains are uncovered during the construction period	Planning department (ERO, cultural resources staff)	Considered complete on finding by ERO that all State laws regarding human remains/burial objects have been adhered to, consultation with MLD is completed as warranted, approval of Archaeological Results Report, and disposition of human remains has occurred as specified in Agreement.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
remains and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The landowner may consult with the project archaeologist and project sponsor and shall consult with the MLD and CEQA lead agency on preservation in place or recovery of the remains and any scientific treatment alternatives. The landowner shall then make all reasonable efforts to develop a Burial Agreement ("Agreement") with the MLD, as expeditiously as possible, for the treatment and disposition, with appropriate dignity, of human remains and funerary objects (as detailed in CEQA Guidelines section 15064.5(d)). Per PRC 5097.98 (b)(1), the Agreement shall address and take into consideration, as applicable and to the degree consistent with the wishes of the MLD, the appropriate excavation, removal, recordation, scientific analysis, custodianship prior to reinterment or curation, and final disposition of the human remains and funerary objects. If the MLD agrees to scientific analyses of the remains and/or funerary objects, the archaeological consultant shall retain possession of the remains and funerary objects until completion of any such analyses, after which the remains and funerary objects shall be reinterred or curated as specified in the Agreement. Both parties are expected to make a concerted and good faith effort to arrive at an Agreement, consistent with the provisions of PRC 5097.98. However, if the landowner and the MLD are unable to reach an Agreement, the landowner, ERO, and project sponsor shall ensure that the remains and/or mortuary materials are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity, in a location not subject to further or future subsurface disturbance, consistent with state law.				

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
Treatment of historic-period human remains and/or funerary objects discovered during any soil-disturbing activity shall be in accordance with protocols laid out in the project archaeological treatment document, and other relevant agreements established between the project sponsor, Medical Examiner and the ERO. The project archaeologist shall retain custody of the remains and associated materials while any scientific study scoped in the treatment document is conducted and the remains shall then be curated or respectfully reinterred by arrangement on a case-by case-basis.				
Cultural Resources Public Interpretation Plan. If a significant archaeological resource (i.e., a historical resource or unique archaeological resources as defined by CEQA Guidelines section 15064.5) is identified and the ERO determines that the public interpretation is warranted, the project archaeologist shall prepare a Cultural Resources Public Interpretation Plan (CRPIP). The Cultural Resources Public Interpretation Plan shall describe the interpretive products, locations or distribution of interpretive materials or displays, the proposed content and materials, the producers or artists of the displays or installation, and a long-term maintenance program. If the archaeological resource is a tribal cultural resource, the department shall notify local Native American representatives, including the Association of Ramaytush Ohlone and other interested Ohlone parties, that public interpretation is being planned. If requested by tribal representatives, the Cultural Resources Public Interpretation Plan shall be prepared in consultation with local Native American tribal representatives and the interpretive products shall be developed with the participation of local Native American tribal representatives. For projects that include dedicated public spaces, the interpretive materials may include an acknowledgement that	Archaeological consultant, project sponsor, Native American tribal representatives as warranted.	Following completion of treatment and analysis of significant archaeological resource by archaeological consultant.	Planning department (ERO, cultural resources staff)	CRPIP is complete on review and approval of ERO. Interpretive program is complete on notification to ERO from the project sponsor that program has been implemented.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
the project is located upon traditional Ohlone lands. For interpretation of a tribal cultural resource, the interpretive program may include a combination of artwork, preferably by local Native American artists, educational panels or other informational displays, a plaque, or other interpretative elements including digital products that address Native American experience and the layers of history. As feasible, and where landscaping is proposed, the interpretive effort may include the use and the interpretation of native and traditional plants incorporated into the proposed landscaping. The project archaeologist shall submit the Cultural Resources Public Interpretation Plan and drafts of any interpretive materials that are subsequently prepared to the ERO for review and approval. The project sponsor shall ensure that the cultural resources public interpretation plan is implemented prior to occupancy of the project.				
Archaeological Resources Report. Whether or not significant archaeological resources are encountered, the archaeological consultant shall submit a written report of the findings of the testing program to the ERO. The archaeological consultant shall submit a draft Archaeological Resources Report (ARR) to the ERO that evaluates the historical significance of any discovered archaeological resource and describes the archaeological, historical research methods employed in the archaeological testing/monitoring/data recovery program(s) undertaken, and if applicable, discusses curation arrangements. Formal site recordation forms (CA DPR 523 series) shall be attached to the ARR as an appendix. Once approved by the ERO, copies of the ARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the	Archaeological consultant, project sponsor	Following completion of treatment by archaeological consultant as determined by the ERO.	Planning department (ERO, cultural resources staff)	Complete on certification to ERO that copies of the approved ARR have been distributed.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
ARR to the NWIC. The environmental planning division of the planning department shall receive one (1) bound hardcopy of the ARR. Digital files that shall be submitted to the environmental division include an unlocked, searchable PDF version of the ARR, GIS shapefiles of the site and feature locations, any formal site recordation forms (CA DPR 523 series), and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. The PDF ARR, GIS files, recordation forms, and/or nomination documentation should be submitted via USB or other stable storage device. If a descendant group was consulted during archaeological treatment, a PDF of the ARR shall be provided to the representative of the descendant group.				
Curation. If archaeological data recovery is undertaken, the project archaeologist and the project sponsor shall ensure that any significant archaeological collections and paleoenvironmental samples of future research value shall be permanently curated at an established curatorial facility. The facility shall be selected in consultation with the ERO. Upon submittal of the collection for curation the project sponsor or archaeologist shall provide a copy of the signed curatorial agreement to the ERO.	Project archaeologist, project sponsor.	In the event a significant archaeological resource is discovered and upon acceptance by the ERO of the ARR	Planning department (ERO, cultural resources staff)	Considered complete upon acceptance of the collection by the curatorial facility.
GEOLOGY AND SOILS				
Mitigation Measure M-GE-5a: Pre-construction Paleontological Evaluation The property owner or designee shall engage a qualified Paleontologist to complete a site-specific Pre-construction Paleontological Resources Evaluation prior to commencing soil-disturbing activities occurring on the project site, to determine whether the project site is within a sensitive area. Prior to issuance of any demolition or building permit, the	Project sponsor's qualified paleontologist.	Prior to issuance of any demolition or building permit.	San Francisco Planning department, Environmental Review Officer.	Considered complete after implementation of Pre-construction Paleontological Resources Evaluation recommendations

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
property owner shall submit the Pre-construction Paleontological Evaluation to the Environmental Review Officer (ERO) for approval. If it is determined that the project site is within a Moderate Sensitivity Area for paleontological resources, the following mitigation shall be implemented: The purpose of the Pre-construction Paleontological Resources Evaluation is to identify early the potential presence of significant paleontological resources on the project site. At a minimum, the study shall include: 1. Project Description 2. Regulatory Environment (outlining applicable federal, State, and local regulations) 3. Summary of Sensitivity Classification 4. Research Methods, including but not limited to: A. Field studies conducted by the approved paleontologist to check for fossils at the surface and assess the exposed sediments. B. Literature Review to include an examination of geologic maps and a review of relevant geological and paleontological literature to determine the nature of geologic units in the project area. C. Locality Search to include outreach to the University of California Museum of Paleontology in Berkeley. 5. Results: to include a summary of literature review and finding of potential site sensitivity for paleontological resources; and depth of potential resources if known. 6. Recommendations for any additional measures that could be necessary to avoid or reduce any adverse impacts to recorded and/or inadvertently discovered paleontological resources of scientific importance, in addition to paleontology standard requirements for Worker Environmental Awareness Training during Construction (Mitigation Measure M-GE-5a) and Discovery of				in construction activities, as approved by the ERO.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
Unanticipated Paleontological Resources during Construction (Mitigation Measure M-GE-5b). Such measures could include: A. Avoidance: If the cost of fossil recovery or other impact reduction options is determined to be too high, or permanent damage to the resource caused by surface disturbance is considered to be unavoidable, given the proposed construction, it may be necessary to "avoid" or "reroute" the portion of the project that intersects the fossil locality in order to prevent adverse impacts on the resource. Avoidance should also be considered if a known fossil locality appears to contain critical scientific information that should be left undisturbed for subsequent scientific evaluation. Avoidance for later scientific research is the typical mitigation recommendation made for scientifically significant extensive paleontological discoveries. B. Fossil Recovery: If isolated small, medium- or large-sized fossils are discovered within a project area during field surveys or construction monitoring, and they are determined to be scientifically significant, they should be recovered. Fossil recovery may involve simply collecting a fully exposed fossil from the ground surface, or may involve a systematic excavation, depending upon the size and complexity of the fossil discovery. Fossil excavations should be designed in such a way as to minimize construction delays while properly collecting the fossil and associated data according to professional paleontological standards. C. Sampling: Scientifically significant microfossils (vertebrate, invertebrate, plant, or trace fossils) may be identified in rock matrix during surveys or monitoring, or, if they are known to occur elsewhere in the same geologic unit or type of deposit in the general area, a				

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
determination of their presence or absence may require the use of test sampling of rock matrix for screen-washing in a paleontological laboratory. In some cases, depending upon the geologic unit involved, test sampling may be appropriate even if microfossils are not visible in the field. The fossils found, if any, will then be inspected and evaluated to determine their significance and whether additional steps are necessary to reduce paleontological impacts. Such steps may include collection of additional matrix for screen washing. The decision to sample may not be made until monitoring is occurring, because it is usually triggered by conditions in the field. D. Monitoring: If scientifically important paleontological resources are known to be present in an area, or if there is a moderate or high likelihood that subsurface fossils are present in geologic units or members thereof within a given project area based on prior field surveys, museum records, or scientific or technical literature, paleontological monitoring of construction excavations would be required. Monitoring involves systematic inspections of graded cut slopes, trench sidewalls, spoils piles, and other types of construction excavations for the presence of fossils, and the fossil recovery and documentation of these fossils before they are destroyed by further ground-disturbing actions. Standard monitoring is typically used in the most paleontologically sensitive geographic areas/geologic units (moderate, high and very high potential); while spot-check monitoring is typically used in geographic areas/geologic units of moderate or unknown paleontological sensitivity (moderate or unknown potential). The goal of monitoring is to identify scientifically significant subsurface fossils as soon as				

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
they are unearthed in order to minimize damage to them and remove them and associated contextual data from the area of ground disturbance, thereby resulting in subsurface paleontological clearance. Microfossil sampling, macrofossil recovery, and avoidance of fossils may all occur during any monitoring program.				
Mitigation Measure M-GE-5b: Worker Environmental Awareness Training during Ground-Disturbing Construction Before and during construction and ground-disturbing activities (including, but not limited to excavation and utility installation), the property owner or their designee shall ensure that all construction workers involved in the proposed project are trained on the contents of the Paleontological Resources Alert Sheet, as provided by the Environmental Review Officer (ERO). The Paleontological Resources Alert Sheet shall be clearly displayed at the project site during ground-disturbing activities to provide Worker Environmental Awareness Training regarding potential paleontological resources prior to construction. In the event of potential fossils being unearthed on the project site, construction personnel would follow immediate stop work procedures and any other relevant procedures. These procedures would be conveyed by the property owner or their designee prior to construction as part of construction documents. The construction supervisor would train new workers that would be involved in ground-disturbing activities as they arrive at the project site. The property owner or designee would submit information of the above-mentioned worker training to the ERO in writing via letter, email, or memo. The writing would confirm the project's location, the date of training, the location of the informational handout display, and the number of participants. The letter	Project sponsor/ contractors(s)	Prior to and during ground disturbing activities	Project sponsor and contractor(s) to submit a confirmation letter to the Environmental Review Officer each time a training session is held. The letter shall be submitted within five (5) business days of conducting a training session	Considered complete upon confirmed receipt of information of Paleontological Resources Alert Sheet worker training to the ERO in writing via letter, email, or memo.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
would be transmitted to the ERO within 5 business days of conducting the training.				
Mitigation Measure M-GE-5c: Discovery of Unanticipated Paleontological Resources during Ground-Disturbing Construction In the event of the discovery of an unanticipated paleontological resource during construction, ground-disturbing activities within 20 feet of the discovery would be temporarily halted until a qualified paleontologist examines it, consistent with the standards set by the Society of Vertebrate Paleontology and the Best Practices in Mitigation Paleontology.[1],[2] Work within 20 feet of the discovery would resume only when deemed appropriate by the qualified paleontologist in consultation with the Environmental Review Officer (ERO). The qualified paleontologist shall determine: (1) if the discovery is scientifically significant; (2) the necessity for involving other responsible or resource agencies and stakeholders, if required or determined applicable; and (3) methods for resource recovery. If a discovered paleontological resource were to be determined by the qualified paleontologist to not be scientifically important, the conclusion would be documented in a Paleontological Evaluation Letter to demonstrate compliance with applicable statutory requirements (e.g., Federal Antiquities Act of 1906, CEQA Guidelines Section 15064.5, California Public Resources Code Chapter 17, Section 5097.5, Paleontological Resources Preservation Act 2009). The Paleontological Evaluation Letter would be submitted to the ERO for review within 30 days of the discovery. If a discovery of a paleontological resource were to be determined by a qualified paleontologist to be of scientific	Project sponsor, qualified paleontologist, and construction contractor	During ground disturbing activities	If necessary, the project sponsor and qualified paleontologist shall submit a Paleontological Evaluation Letter or Paleontological Impact Reduction Program to the ERO	Considered complete upon ERO's receipt of Paleontological Evaluation Letter and paleontology report, and after implementation of Paleontological Impact Reduction Program as approved by the ERO.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
importance and to have no feasible measures to avoid its disturbance, the qualified Paleontologist would prepare a Paleontological Impact Reduction Program within 10 business days of the discovery. The Paleontological Impact Reduction Program would include measures to fully document and recover the resource of scientific importance and would be submitted to the ERO for review and approval. Upon approval by the ERO, ground-disturbing activities in the project area would resume and be monitored as determined by the qualified Paleontologist for the duration of such activities. The impact reduction program would include: (1) procedures for construction monitoring at the project site; (2) fossil preparation and identification procedures; (3) curation of paleontological resources of scientific importance into an appropriate repository; and (4) preparation of a Paleontological Resources Report at the conclusion of ground-disturbing activities. The Paleontological Resources Report would include dates of field work, results of monitoring, fossil identifications to the lowest possible taxonomic level, analysis of the fossil collection, a discussion of the scientific significance of the fossil collection, conclusions, locality forms, an itemized list of specimens, and a repository receipt from the curation facility. Responsibility for the preparation and implementation of the impact reduction program, any costs necessary to prepare and identify collected fossils, and any curation fees charged by the paleontological repository, would lie with the property owner or designee. The paleontology report would be submitted to the ERO for review within 30 business days from conclusion of ground-disturbing activities, or as negotiated following consultation with the ERO.				

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ATTACHMENT B

San Francisco Planning

AGREEMENT TO IMPLEMENT MITIGATION MONITORING AND REPORTING PROGRAM

Record No.:	2020.0014ENV	*Block/Lot:*	0207/035 and 0207/036
Project Title:	545 Sansome Street	*Lot Size:*	14,480 square feet
Zoning:	C-3-O (Downtown Office) Use District 200-S Height and Bulk District	*Project Sponsor:*	Chloe Angelis, 415.567.9000
		Lead Agency:	San Francisco Planning Department
		Staff Contact:	Ryan Shum, 628.652.7542

The table below indicates when compliance with each mitigation measure must occur. Some mitigation measures span multiple phases. Substantive descriptions of each mitigation measure's requirements are provided on the following pages in the Mitigation Monitoring and Reporting Program (MMRP).

Adopted Mitigation Measure	Period of Compliance			Compliance with Mitigation Measure Completed?
	Prior to the Start of Construction*	During Construction**	Post-construction or Operational	
Mitigation Measure M-CR-1: Exterior Surface Repair, Cleaning, and Painting	X	X		
Mitigation Measure M-CR-2: Archaeological Testing	X	X		
Mitigation Measure M-GE-5a: Pre-construction Paleontological Evaluation	X			
Mitigation Measure M-GE-5b: Worker Environmental Awareness Training during Ground-Disturbing Construction	X	X		
Mitigation Measure M-GE-5c: Discovery of Unanticipated Paleontological Resources during Ground-Disturbing Construction		X		

NOTES:
* Prior to any ground disturbing activities at the project site.
** Construction is broadly defined to include any physical activities associated with construction of a development project including, but not limited to: site preparation, clearing, demolition, excavation, shoring, foundation installation, and building construction.

I agree to implement the attached mitigation measure(s) as a condition of project approval.

Property Owner or Legal Agent Signature

September 28, 2023

Date

Note to sponsor: Please contact CPC.EnvironmentalMonitoring@sfgov.org to begin the environmental monitoring process prior to the submittal of your building permits to the San Francisco Department Building Inspection.

MITIGATION MONITORING AND REPORTING PROGRAM

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
MITIGATION MEASURES AGREED TO BY PROJECT SPONSOR				
CULTURAL RESOURCES				
Mitigation Measure M-CR-1: Exterior Surface Repair, Cleaning, and Painting The project sponsor shall hire a qualified architectural conservation professional to identify and prepare specifications for exterior surface repairs and patching of historic concrete as well as cleaning methods and painting specifications. These specifications shall ensure that methods used in cleaning, painting, and/or repairing any exterior surfaces through chemical or physical treatments are found to be the gentlest possible to the historical resource, in accordance with Standard 7 of the Secretary of Interior's Standards for Rehabilitation. Specifications established by the qualified architectural conservation professional shall be subject to review and approval by planning department preservation staff prior to issuance of the architectural addendum to the site permit.	Project sponsor and archaeological conservation professional, subject to San Francisco planning department review and approval.	Prior to issuance of construction permits and throughout the construction period.	Planning department Preservation Staff	Considered complete after implementation of approved specifications for exterior surface repair, cleaning, and painting of historic concrete.
Mitigation Measure M-CR-2 Archaeological Testing Based on a reasonable potential that archaeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effects from the proposed project on buried or submerged historical resources. Archaeological Testing Program. The purpose of the archaeological testing program will be to determine to the extent possible the presence or absence of archaeological resources and to identify and to evaluate whether any	Project sponsor and ERO	Prior to issuance of construction permits	Planning department (ERO, cultural resources staff)	Complete when project sponsor retains qualified archaeological consultant.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
archaeological resource encountered on the site constitutes an historical resource under CEQA. The project sponsor shall retain the services of an archaeological consultant from the rotational Qualified Archaeological Consultants List (QACL) maintained by the planning department. After the first project approval action or as directed by the Environmental Review Officer (ERO), the project sponsor shall contact the department archaeologist to obtain the names and contact information for the next three archaeological consultants on the QACL. The archaeological consultant shall undertake an archaeological testing program as specified herein. The archaeological consultant's work shall be conducted in accordance with this measure at the direction of the ERO. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment and shall be considered draft reports subject to revision until final approval by the ERO. In addition, the consultant shall be available to conduct an archaeological monitoring and/or data recovery program if required pursuant to this measure. Archaeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archaeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c).				
Archaeological Testing Plan. The archaeological testing program shall be conducted in accordance with the approved Archaeological Testing Plan (ATP). The archaeological consultant and the ERO shall consult on the scope of the ATP, which shall be approved by the ERO prior to any project-related soils disturbing activities commencing. The ATP shall	Project sponsor's qualified archaeological consultant and construction	Prior to issuance of construction permits and throughout the construction period	Planning department (ERO, cultural resources staff).	Considered complete after implementation of approved ATP.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
be submitted first and directly to the ERO for review and comment and shall be considered a draft subject to revision until final approval by the ERO. The archaeologist shall implement the testing as specified in the approved ATP prior to and/or during construction. The ATP shall identify the property types of the expected archaeological resource(s) that potentially could be adversely affected by the proposed project, lay out what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. The ATP shall also identify the testing method to be used, the depth or horizonal extent of testing, and the locations recommended for testing and shall identify archaeological monitoring requirements for construction soil disturbance as warranted.	contractor, project sponsor			
<u>Construction Crew Archaeological Awareness.</u> Prior to any soils-disturbing activities being undertaken, the project archaeologist shall conduct a brief on-site archaeological awareness training that describes the types of resources that might be encountered and how they might be recognized, and requirements and procedures for work stoppage, resource protection and notification in the event of a potential archaeological discovery. The project archaeologist also shall distribute an "Alert" wallet card, based on the department's "ALERT" sheet, that summarizes stop work requirements and provides necessary contact information for the project archaeologist, project sponsor and the to all field personnel involved in soil disturbing activities, including machine operators, field crew, pile drivers, supervisory personnel, etc., have received. The project archaeologist shall repeat the training at intervals during construction, as determined necessary by the ERO, including when new construction	Project archaeologist for awareness training, Native American representative for Native American cultural resources sensitivity training (if requested)	Prior to any soil disturbing activity	Planning department (ERO, cultural resources staff)	Considered complete after implementation of approved ATP.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
personnel start work and prior to periods of soil disturbing work when the project archaeologist will not be on-site. Tribal Cultural Resources Sensitivity Training. In addition to and concurrently with the archaeological awareness training, the project sponsor shall ensure that a local Native American representative is afforded the opportunity to provide a Native American cultural resources sensitivity training to all construction personnel.				
Native American Archaeological Deposits and Tribal Notification. All Native American archaeological deposits shall be assumed to be significant unless determined otherwise in consultation with the ERO. If a Native American archaeological deposit is encountered, soil disturbing work shall be halted as detailed above. In addition, the ERO shall notify any tribal representatives who, in response to the project tribal cultural resource notification, requested to be notified of discovery of Native American archaeological resources in order to coordinate on the treatment of archaeological and tribal cultural resources. Further the project archaeologist shall offer a Native American representative the opportunity to monitor any subsequent soil disturbing activity that could affect the find.	Project sponsor, Archaeological consultant/Project archaeologist and ERO	During soils disturbing activities if Native American archaeological resources are encountered	Planning department (ERO, cultural resources staff)	Considered complete when Native American representatives respond to notice or conduct monitoring
Paleoenvironmental Analysis of Paleosols. When a submerged paleosol is identified during monitoring, irrespective of whether cultural material is present, samples shall be extracted and processed for dating, flotation for paleobotanical analysis, and other applicable special analyses pertinent to identification of possible cultural soils and for environmental reconstruction. The results of analysis of collected samples shall be reported on in results reports. If important information about past environmental conditions is discovered during coring and analysis, this information shall	Archaeological consultant, project sponsor	During construction	Planning department (ERO, cultural resources staff)	Considered complete when samples are collected, processed, and analyzed

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
be presented to the public in the form of interpretive materials, such as panels, installed in a public area at the project location.				
Discovery Treatment Determination. At the completion of the archaeological testing program, the archaeological consultant shall submit a written summary of the findings to the ERO. The findings memo shall describe and identify each resource and provide an initial assessment of the integrity and significance of encountered archaeological deposits. If the ERO in consultation with the archaeological consultant determines that a significant archaeological resource is present and that the resource could be adversely affected by the proposed project, the ERO, in consultation with the project sponsor, shall determine whether preservation of the resource in place is feasible. In the event of the discovery of a tribal cultural resource, the ERO, the project sponsor, and the local Native American representative, shall consult to determine whether preservation in place would be feasible and effective. Coordination shall take place with local Native American representatives, including the Association of Ramaytush Ohlone and other interested Ohlone parties. If so, the proposed project shall be re-designed so as to avoid any adverse effect on the significant archaeological resource and the archaeological consultant shall prepare a cultural resource preservation plan (CRPP), which shall be implemented by the project sponsor during construction. The consultant shall submit a draft CRPP to the planning department for review and approval. If preservation in place is not feasible, a data recovery program shall be implemented, unless the ERO determines that the archaeological resource is of greater interpretive than research significance and that interpretive use of the resource is	Archaeological consultant, project sponsor and ERO	During construction	Planning department (ERO, cultural resources staff)	Considered completed after review and approval of archaeological testing results memo by ERO; or CRPP is approve; or it's determined that treatment is needed

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
feasible. The ERO in consultation with the archaeological consultant shall also determine if additional treatment is warranted, which may include additional testing and/or construction monitoring.				
Consultation with Descendant Communities. On discovery of an archaeological site associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group an appropriate representative of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archaeological field investigations of the site and to offer recommendations to the ERO regarding appropriate archaeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archaeological site. The ERO and project sponsor shall work with the tribal representative or other representatives of descendant communities to identify the scope of work to fulfill the requirements of this mitigation measure, which may include participation in preparation and review of deliverables (e.g., plans, interpretive materials, artwork). Representatives shall be compensated for their work as identified in the agreed upon scope of work. A copy of the Archaeological Resources Report (ARR) shall be provided to the representative of the descendant group. Compensation. Following on the initial tribal consultation, the ERO, project sponsor and project archaeologist, as appropriate, shall work with the tribal representative or other descendant or descendant community representatives to identify the scope of work for a representative to fulfill the requirements of this mitigation measure, which may include participation in archaeological monitoring, preparation and review of deliverables (e.g., plans, interpretive materials, artwork). Tribal representatives or other descendant	Archaeological consultant, descendant group, project sponsor, and ERO	After discovery of significant resource associated with a descendant group	Planning department (ERO, cultural resources staff)	Considered completed after descendant group has received ARR and been compensated for work on deliverables.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
community representatives for archaeological resources or tribal cultural resources, who complete tasks in the agreed upon scope of work project, shall be compensated for their work as identified in the agreed upon scope of work.				
Archaeological Data Recovery Plan. An archaeological data recovery program shall be conducted in accordance with an Archaeological Data Recovery Plan (ADRP) if all three of the following apply: 1) a resource has potential to be significant, 2) preservation in place is not feasible, and 3) the ERO determines that an archaeological data recovery program is warranted. The archaeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. If a Native American archaeological resource is discovered consultation on the scope of the ADRP shall include coordination with local Native American tribal representatives. The archaeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archaeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archaeological resources if nondestructive methods are practical. The scope of the ADRP shall include the following elements: • Field Methods and Procedures. Descriptions of proposed field strategies, procedures, and operations.	Project sponsor's qualified archaeological consultant, project sponsor	Upon ERO's determination that data recovery is required in the event an archaeological resource is discovered	Planning department (ERO, cultural resources staff)	Considered complete after ERO's approval of Archaeological Data Recovery Plan.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
• Cataloguing and Laboratory Analysis. Description of selected cataloguing system and artifact analysis procedures. • Discard and Deaccession Policy. Description of and rationale for field and post-field discard and deaccession policies. • Security Measures. Recommended security measures to protect the archaeological resource from vandalism, looting, and non-intentionally damaging activities. • Final Report. Description of proposed report format and distribution of results. • Curation. Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.				
Coordination of Archaeological Data Recovery Investigations. In cases in which the same resource has been or is being affected by another project, such as 530 Sansome Street project (2019-017481), for which data recovery has been conducted, is in progress, or is planned, in order to maximize the scientific and interpretive value of the data recovered from both archaeological investigations, the following measures shall be implemented: a. In cases where neither investigation has not yet begun, both archaeological consultants and the ERO shall consult on coordinating and collaboration on archaeological research design, data recovery methods, analytical methods, reporting, curation, and interpretation to ensure consistent data recovery and treatment of the resource. b. In cases where archaeological data recovery investigation is already under way or has been completed for a prior project, the archaeological consultant for the subsequent project shall consult with the prior archaeological consultant, if available; review prior treatment plans,	Archaeological consultant in consultation with ERO, project sponsor	At initiation of preparation of ADRP	Planning department (ERO, cultural resources staff)	Considered complete approval of Final Archaeological Results Report

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
findings and reporting; and inspect and assess existing archaeological collections/inventories from the site prior to preparation of the archaeological treatment plan for the subsequent discovery, and shall incorporate prior findings in the final report of the subsequent investigation. The objectives of this coordination and review of prior methods and findings will be to identify refined research questions; determine appropriate data recovery methods and analyses; assess new findings relative to prior research findings; and integrate prior findings into subsequent reporting and interpretation.				
Human Remains and Funerary Objects. The treatment of any human remains and funerary objects discovered during any soils disturbing activity shall comply with applicable State laws, including Section 7050.5 of the Health and Safety Code and Public Resources Code 5097.98. If human remains or suspected human remains are encountered during construction, the contractor and project sponsor shall ensure that ground-disturbing work within 50 feet of the remains is halted immediately and shall arrange for the protection in place of the remains until appropriate treatment and disposition have been agreed upon and implemented in accordance with this section. Upon determining that the remains are human, the project archaeologist shall immediately notify the Medical Examiner of the City and County of San Francisco of the find. The archaeologist shall also immediately notify the ERO and the project sponsor of the find. In the event of the Medical Examiner's determination that the human remains are Native American in origin, the Medical Examiner will notify the California State Native American Heritage Commission (NAHC) within 24 hours. The NAHC will immediately appoint and notify a Most Likely Descendant (MLD). The MLD will complete his or her inspection of the	Project sponsor/ archaeological consultant in consultation with the ERO, Medical Examiner, NAHC, and MLD as warranted	In the event that human remains are uncovered during the construction period	Planning department (ERO, cultural resources staff)	Considered complete on finding by ERO that all State laws regarding human remains/burial objects have been adhered to, consultation with MLD is completed as warranted, approval of Archaeological Results Report, and disposition of human remains has occurred as specified in Agreement.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
remains and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The landowner may consult with the project archaeologist and project sponsor and shall consult with the MLD and CEQA lead agency on preservation in place or recovery of the remains and any scientific treatment alternatives. The landowner shall then make all reasonable efforts to develop a Burial Agreement ("Agreement") with the MLD, as expeditiously as possible, for the treatment and disposition, with appropriate dignity, of human remains and funerary objects (as detailed in CEQA Guidelines section 15064.5(d)). Per PRC 5097.98 (b)(1), the Agreement shall address and take into consideration, as applicable and to the degree consistent with the wishes of the MLD, the appropriate excavation, removal, recordation, scientific analysis, custodianship prior to reinterment or curation, and final disposition of the human remains and funerary objects. If the MLD agrees to scientific analyses of the remains and/or funerary objects, the archaeological consultant shall retain possession of the remains and funerary objects until completion of any such analyses, after which the remains and funerary objects shall be reinterred or curated as specified in the Agreement. Both parties are expected to make a concerted and good faith effort to arrive at an Agreement, consistent with the provisions of PRC 5097.98. However, if the landowner and the MLD are unable to reach an Agreement, the landowner, ERO, and project sponsor shall ensure that the remains and/or mortuary materials are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity, in a location not subject to further or future subsurface disturbance, consistent with state law.				

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
Treatment of historic-period human remains and/or funerary objects discovered during any soil-disturbing activity shall be in accordance with protocols laid out in the project archaeological treatment document, and other relevant agreements established between the project sponsor, Medical Examiner and the ERO. The project archaeologist shall retain custody of the remains and associated materials while any scientific study scoped in the treatment document is conducted and the remains shall then be curated or respectfully reinterred by arrangement on a case-by case-basis.				
Cultural Resources Public Interpretation Plan. If a significant archaeological resource (i.e., a historical resource or unique archaeological resources as defined by CEQA Guidelines section 15064.5) is identified and the ERO determines that the public interpretation is warranted, the project archaeologist shall prepare a Cultural Resources Public Interpretation Plan (CRPIP). The Cultural Resources Public Interpretation Plan shall describe the interpretive products, locations or distribution of interpretive materials or displays, the proposed content and materials, the producers or artists of the displays or installation, and a long-term maintenance program. If the archaeological resource is a tribal cultural resource, the department shall notify local Native American representatives, including the Association of Ramaytush Ohlone and other interested Ohlone parties, that public interpretation is being planned. If requested by tribal representatives, the Cultural Resources Public Interpretation Plan shall be prepared in consultation with local Native American tribal representatives and the interpretive products shall be developed with the participation of local Native American tribal representatives. For projects that include dedicated public spaces, the interpretive materials may include an acknowledgement that	Archaeological consultant, project sponsor, Native American tribal representatives as warranted.	Following completion of treatment and analysis of significant archaeological resource by archaeological consultant.	Planning department (ERO, cultural resources staff)	CRPIP is complete on review and approval of ERO. Interpretive program is complete on notification to ERO from the project sponsor that program has been implemented.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
the project is located upon traditional Ohlone lands. For interpretation of a tribal cultural resource, the interpretive program may include a combination of artwork, preferably by local Native American artists, educational panels or other informational displays, a plaque, or other interpretative elements including digital products that address Native American experience and the layers of history. As feasible, and where landscaping is proposed, the interpretive effort may include the use and the interpretation of native and traditional plants incorporated into the proposed landscaping. The project archaeologist shall submit the Cultural Resources Public Interpretation Plan and drafts of any interpretive materials that are subsequently prepared to the ERO for review and approval. The project sponsor shall ensure that the cultural resources public interpretation plan is implemented prior to occupancy of the project.				
Archaeological Resources Report. Whether or not significant archaeological resources are encountered, the archaeological consultant shall submit a written report of the findings of the testing program to the ERO. The archaeological consultant shall submit a draft Archaeological Resources Report (ARR) to the ERO that evaluates the historical significance of any discovered archaeological resource and describes the archaeological, historical research methods employed in the archaeological testing/monitoring/data recovery program(s) undertaken, and if applicable, discusses curation arrangements. Formal site recordation forms (CA DPR 523 series) shall be attached to the ARR as an appendix. Once approved by the ERO, copies of the ARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the	Archaeological consultant, project sponsor	Following completion of treatment by archaeological consultant as determined by the ERO.	Planning department (ERO, cultural resources staff)	Complete on certification to ERO that copies of the approved ARR have been distributed.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
ARR to the NWIC. The environmental planning division of the planning department shall receive one (1) bound hardcopy of the ARR. Digital files that shall be submitted to the environmental division include an unlocked, searchable PDF version of the ARR, GIS shapefiles of the site and feature locations, any formal site recordation forms (CA DPR 523 series), and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. The PDF ARR, GIS files, recordation forms, and/or nomination documentation should be submitted via USB or other stable storage device. If a descendant group was consulted during archaeological treatment, a PDF of the ARR shall be provided to the representative of the descendant group.				
Curation. If archaeological data recovery is undertaken, the project archaeologist and the project sponsor shall ensure that any significant archaeological collections and paleoenvironmental samples of future research value shall be permanently curated at an established curatorial facility. The facility shall be selected in consultation with the ERO. Upon submittal of the collection for curation the project sponsor or archaeologist shall provide a copy of the signed curatorial agreement to the ERO.	Project archaeologist, project sponsor.	In the event a significant archaeological resource is discovered and upon acceptance by the ERO of the ARR	Planning department (ERO, cultural resources staff)	Considered complete upon acceptance of the collection by the curatorial facility.
GEOLOGY AND SOILS				
Mitigation Measure M-GE-5a: Pre-construction Paleontological Evaluation The property owner or designee shall engage a qualified Paleontologist to complete a site-specific Pre-construction Paleontological Resources Evaluation prior to commencing soil-disturbing activities occurring on the project site, to determine whether the project site is within a sensitive area. Prior to issuance of any demolition or building permit, the	Project sponsor's qualified paleontologist.	Prior to issuance of any demolition or building permit.	San Francisco Planning department, Environmental Review Officer.	Considered complete after implementation of Pre-construction Paleontological Resources Evaluation recommendations

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
property owner shall submit the Pre-construction Paleontological Evaluation to the Environmental Review Officer (ERO) for approval. If it is determined that the project site is within a Moderate Sensitivity Area for paleontological resources, the following mitigation shall be implemented: The purpose of the Pre-construction Paleontological Resources Evaluation is to identify early the potential presence of significant paleontological resources on the project site. At a minimum, the study shall include: 1. Project Description 2. Regulatory Environment (outlining applicable federal, State, and local regulations) 3. Summary of Sensitivity Classification 4. Research Methods, including but not limited to: A. Field studies conducted by the approved paleontologist to check for fossils at the surface and assess the exposed sediments. B. Literature Review to include an examination of geologic maps and a review of relevant geological and paleontological literature to determine the nature of geologic units in the project area. C. Locality Search to include outreach to the University of California Museum of Paleontology in Berkeley. 5. Results: to include a summary of literature review and finding of potential site sensitivity for paleontological resources; and depth of potential resources if known. 6. Recommendations for any additional measures that could be necessary to avoid or reduce any adverse impacts to recorded and/or inadvertently discovered paleontological resources of scientific importance, in addition to paleontology standard requirements for Worker Environmental Awareness Training during Construction (Mitigation Measure M-GE-5a) and Discovery of				in construction activities, as approved by the ERO.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
Unanticipated Paleontological Resources during Construction (Mitigation Measure M-GE-5b). Such measures could include: A. Avoidance: If the cost of fossil recovery or other impact reduction options is determined to be too high, or permanent damage to the resource caused by surface disturbance is considered to be unavoidable, given the proposed construction, it may be necessary to "avoid" or "reroute" the portion of the project that intersects the fossil locality in order to prevent adverse impacts on the resource. Avoidance should also be considered if a known fossil locality appears to contain critical scientific information that should be left undisturbed for subsequent scientific evaluation. Avoidance for later scientific research is the typical mitigation recommendation made for scientifically significant extensive paleontological discoveries. B. Fossil Recovery: If isolated small, medium- or large-sized fossils are discovered within a project area during field surveys or construction monitoring, and they are determined to be scientifically significant, they should be recovered. Fossil recovery may involve simply collecting a fully exposed fossil from the ground surface, or may involve a systematic excavation, depending upon the size and complexity of the fossil discovery. Fossil excavations should be designed in such a way as to minimize construction delays while properly collecting the fossil and associated data according to professional paleontological standards. C. Sampling: Scientifically significant microfossils (vertebrate, invertebrate, plant, or trace fossils) may be identified in rock matrix during surveys or monitoring, or, if they are known to occur elsewhere in the same geologic unit or type of deposit in the general area, a				

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determination of their presence or absence may require the use of test sampling of rock matrix for screen-washing in a paleontological laboratory. In some cases, depending upon the geologic unit involved, test sampling may be appropriate even if microfossils are not visible in the field. The fossils found, if any, will then be inspected and evaluated to determine their significance and whether additional steps are necessary to reduce paleontological impacts. Such steps may include collection of additional matrix for screen washing. The decision to sample may not be made until monitoring is occurring, because it is usually triggered by conditions in the field. D. Monitoring: If scientifically important paleontological resources are known to be present in an area, or if there is a moderate or high likelihood that subsurface fossils are present in geologic units or members thereof within a given project area based on prior field surveys, museum records, or scientific or technical literature, paleontological monitoring of construction excavations would be required. Monitoring involves systematic inspections of graded cut slopes, trench sidewalls, spoils piles, and other types of construction excavations for the presence of fossils, and the fossil recovery and documentation of these fossils before they are destroyed by further ground-disturbing actions. Standard monitoring is typically used in the most paleontologically sensitive geographic areas/geologic units (moderate, high and very high potential); while spot-check monitoring is typically used in geographic areas/geologic units of moderate or unknown paleontological sensitivity (moderate or unknown potential). The goal of monitoring is to identify scientifically significant subsurface fossils as soon as				

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they are unearthed in order to minimize damage to them and remove them and associated contextual data from the area of ground disturbance, thereby resulting in subsurface paleontological clearance. Microfossil sampling, macrofossil recovery, and avoidance of fossils may all occur during any monitoring program.				
Mitigation Measure M-GE-5b: Worker Environmental Awareness Training during Ground-Disturbing Construction Before and during construction and ground-disturbing activities (including, but not limited to excavation and utility installation), the property owner or their designee shall ensure that all construction workers involved in the proposed project are trained on the contents of the Paleontological Resources Alert Sheet, as provided by the Environmental Review Officer (ERO). The Paleontological Resources Alert Sheet shall be clearly displayed at the project site during ground-disturbing activities to provide Worker Environmental Awareness Training regarding potential paleontological resources prior to construction. In the event of potential fossils being unearthed on the project site, construction personnel would follow immediate stop work procedures and any other relevant procedures. These procedures would be conveyed by the property owner or their designee prior to construction as part of construction documents. The construction supervisor would train new workers that would be involved in ground-disturbing activities as they arrive at the project site. The property owner or designee would submit information of the above-mentioned worker training to the ERO in writing via letter, email, or memo. The writing would confirm the project's location, the date of training, the location of the informational handout display, and the number of participants. The letter	Project sponsor/ contractors(s)	Prior to and during ground disturbing activities	Project sponsor and contractor(s) to submit a confirmation letter to the Environmental Review Officer each time a training session is held. The letter shall be submitted within five (5) business days of conducting a training session	Considered complete upon confirmed receipt of information of Paleontological Resources Alert Sheet worker training to the ERO in writing via letter, email, or memo.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
would be transmitted to the ERO within 5 business days of conducting the training.				
Mitigation Measure M-GE-5c: Discovery of Unanticipated Paleontological Resources during Ground-Disturbing Construction In the event of the discovery of an unanticipated paleontological resource during construction, ground-disturbing activities within 20 feet of the discovery would be temporarily halted until a qualified paleontologist examines it, consistent with the standards set by the Society of Vertebrate Paleontology and the Best Practices in Mitigation Paleontology.[1],[2] Work within 20 feet of the discovery would resume only when deemed appropriate by the qualified paleontologist in consultation with the Environmental Review Officer (ERO). The qualified paleontologist shall determine: (1) if the discovery is scientifically significant; (2) the necessity for involving other responsible or resource agencies and stakeholders, if required or determined applicable; and (3) methods for resource recovery. If a discovered paleontological resource were to be determined by the qualified paleontologist to not be scientifically important, the conclusion would be documented in a Paleontological Evaluation Letter to demonstrate compliance with applicable statutory requirements (e.g., Federal Antiquities Act of 1906, CEQA Guidelines Section 15064.5, California Public Resources Code Chapter 17, Section 5097.5, Paleontological Resources Preservation Act 2009). The Paleontological Evaluation Letter would be submitted to the ERO for review within 30 days of the discovery. If a discovery of a paleontological resource were to be determined by a qualified paleontologist to be of scientific	Project sponsor, qualified paleontologist, and construction contractor	During ground disturbing activities	If necessary, the project sponsor and qualified paleontologist shall submit a Paleontological Evaluation Letter or Paleontological Impact Reduction Program to the ERO	Considered complete upon ERO's receipt of Paleontological Evaluation Letter and paleontology report, and after implementation of Paleontological Impact Reduction Program as approved by the ERO.

Adopted Mitigation Measures	Monitoring and Reporting Program			
	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility	Implementation Responsibility
importance and to have no feasible measures to avoid its disturbance, the qualified Paleontologist would prepare a Paleontological Impact Reduction Program within 10 business days of the discovery. The Paleontological Impact Reduction Program would include measures to fully document and recover the resource of scientific importance and would be submitted to the ERO for review and approval. Upon approval by the ERO, ground-disturbing activities in the project area would resume and be monitored as determined by the qualified Paleontologist for the duration of such activities. The impact reduction program would include: (1) procedures for construction monitoring at the project site; (2) fossil preparation and identification procedures; (3) curation of paleontological resources of scientific importance into an appropriate repository; and (4) preparation of a Paleontological Resources Report at the conclusion of ground-disturbing activities. The Paleontological Resources Report would include dates of field work, results of monitoring, fossil identifications to the lowest possible taxonomic level, analysis of the fossil collection, a discussion of the scientific significance of the fossil collection, conclusions, locality forms, an itemized list of specimens, and a repository receipt from the curation facility. Responsibility for the preparation and implementation of the impact reduction program, any costs necessary to prepare and identify collected fossils, and any curation fees charged by the paleontological repository, would lie with the property owner or designee. The paleontology report would be submitted to the ERO for review within 30 business days from conclusion of ground-disturbing activities, or as negotiated following consultation with the ERO.				

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