Addendum to Environmental Impact Report

Addendum Date: February 20, 2013
Case No.: 2007.0030E
Project Title: 8 Washington Street/Seawall Lot 351
EIR: 8 Washington Street/Seawall Lot 351 Project Final EIR
SCL No. 2007122027, certified March 22, 2012
Zoning: RC-4
Height and Bulk: 84-E
Block/Lots: 0168/058, 0171/069, 0201/012, and Seawall Lot 351, which includes 0201/013
Lot Size: 138,681 square feet
Project Sponsor: Simon Snellgrove, San Francisco Waterfront Partners II, (415) 675-2100
Pier 1, Bay 2, The Embarcadero, San Francisco, CA 94111
Lead Agency: San Francisco Planning Department
Staff Contact: Nannie Turrell – 415.575.9047
nannie.turrell@sfgov.org

REMARKS

Background

On March 22, 2012, the San Francisco Planning Commission (Planning Commission) certified a Final Environmental Impact Report (FEIR) for the 8 Washington Street/Seawall Lot 351 Project (Planning Commission Motion No. 18560), in compliance with the California Environmental Quality Act (CEQA), and approved a conditional use authorization for a planned unit development (PUD) on the project site (Planning Commission Motion No. 18567).

On May 15, 2012, the San Francisco Board of Supervisors (BOS) affirmed the certification of the FEIR for the 8 Washington Street/Seawall Lot 351 Project (BOS Motion No. M12-061) and approved the Planning Commission’s approval of the conditional use authorization (BOS Motion No. M12-062).

On June 12, 2012, the BOS, by Resolution No. 226-12 (File No. 120270), approved the Purchase and Sale Agreement, Trust Exchange Agreement, and form of Lease and Maintenance Agreement with the San Francisco Port Commission (Port), adopted environmental findings and findings of consistency with the General Plan and the eight Priority Policies of Planning Code Section 101.1, and authorized the Port’s Executive Director and the City’s Director of Property to execute documents, make certain modifications, and take certain actions in furtherance of the Resolution No. 226-12.

On June 19, 2012, the BOS adopted ordinances to reclassify the height and bulk limits for portions of the project site (BOS Ordinance No. 104-12) and to amend the Northeast Waterfront Area Plan of the General Plan (BOS Ordinance No. 105-12). The project as approved by the Board (“approved project”) is the same as the Large Fitness Center Project Variant analyzed in the Final EIR, Chapter VII, C&R IV.37-44, except the approved project would provide for 134 residential units instead of 160 units and would provide for 327 parking spaces (127 residential spaces and 200 commercial spaces) instead of the 420 parking spaces...
in the Large Fitness Center Project Variant. CEQA Findings adopted by the Planning Commission in Motion No. 18561 (“CEQA Findings”) and a memo from Paul Maltzer to the Clerk of the Board of Supervisors dated June 12, 2012 (“Parking Memorandum”), on file with the Clerk of the Board in File No. 0105-12 support why the reduction of residential units and parking spaces would not alter the conclusions reached in the Final EIR as to impacts associated with the Large Fitness Center Project Variant.

On August 1, 2012, the Department of Elections certified a petition entitled “Referendum Against Ordinance 104-12, 8 Washington Street” (the “Referendum”). On September 4, 2012, the Board of Supervisors voted to not repeal Ordinance No. 104-12 and directed the Department of Elections to place the Referendum on the ballot for the next election, which is currently scheduled for November 5, 2013. Construction of the project as proposed in the FEIR and approved to date requires approval of the change in height and bulk limits as reflected in Ordinance 104-12.

The approved project features two buildings in a roughly north-south orientation on the southern portion of the project site. The east building (4 to 6 stories and 48 to 70 feet tall) would run along The Embarcadero, and the west building (8 to 12 stories, 81 to 136 feet tall) would run along Drumm Street. The two buildings would be connected by a one-story podium. There would be a separate 2-story building containing an athletic club on the northern portion of the project site. Proposed uses would include a total of 134 dwelling units, approximately 16,350 gross square feet (gsf) of athletic club space, approximately 19,800 gsf of restaurant/retail space, and 382 parking spaces in an underground garage. The athletic club will have at ground level, swimming and lap pools, but there would be no tennis courts. Private and common open space for the project residents and open space accessible to the public would be provided. There would be a new approximately 9,500-square-foot (sf) publicly accessible open space (Jackson Common) that runs east-west from Drumm Street to The Embarcadero and bisects the project site, along with an approximately 11,500-sf publicly accessible park at the north end of the project site and a widened Drumm Street pedestrian path from Jackson Street to The Embarcadero.

**PROJECT DESCRIPTION**

The project sponsor proposes minor modifications to the approved project. The modifications concern some sidewalk and roadway reconfigurations, a slight increase in open space, the vacation of certain public service easements, some of which will be relocated, and the granting of new easements to the City. None of the proposed modifications alter the footprint, height, and location of the buildings, the number of dwelling units, the square footage of athletic club and restaurant/retail space, the number of parking spaces, the number of recreational swimming and lap pools, and the length of construction. These would remain the same as the approved project. The modifications arise as a result of discussions with City agencies regarding desired design of street configurations and sidewalk widths and further surveying and mapping of easements in and around the project site. The modified project would be the same as the approved project discussed above, except for the following changes:
Publicly Accessible Open Space

The modified project would include approximately 27,315 sf of publicly accessible open space,¹ which would be about 2,135 sf more than the 25,180 sf that was included as part of the Larger Fitness Center Variant and analyzed in the FEIR (pp. VII.7-VII.9).

Roadway and Sidewalk Configuration

The modified project would make physical changes to Washington Street and the east side of Drumm Street that would be different than those included as part of the Larger Fitness Center Variant and analyzed in the EIR (see Table 1 and Figure 1). Compared to the Larger Fitness Center Variant, the modified project would result in the following changes:²

- Narrowing the landscaped median on Washington Street from 10 feet to 7 feet instead of eliminating the existing median;
- Eliminating one eastbound traffic lane on Washington Street from Drumm Street to The Embarcadero instead of retaining two eastbound traffic lanes, and narrowing by 2 feet, to 10 feet (compared to the existing 13 feet) the traffic lanes on Washington;
- Widening the sidewalk to between 17 and 24 feet instead of 20 feet (from the existing 10 feet) on the north side of Washington Street;
- Decreasing parking by 8 additional spaces, for a total reduction of 12 fewer spaces on Washington Street;
- Adding a bike lane each way on Washington Street between Drumm Street and The Embarcadero;
- Narrowing the traffic lanes to 15 feet instead of 16 feet (from 20 feet) on Drumm Street; and
- Widening the sidewalk to 20 feet from 18 feet (compared to the existing 10 feet) on the east side of Drumm Street.

Public Service Easements

The project sponsor desires to vacate several public service easements within the project site.³ All easements proposed to be vacated are identified in a proposed ordinance that would authorize the summary vacation and relocation, if needed, of these existing City public service easements in, on, or under the project site:

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¹ Martin M. Ron Associates, Inc., Tentative Phased Final Map, Sheet 5, May 2012. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, California, in the project files for Case No. 2007.0030E.
² Adavant Consulting, Transportation Technical Memorandum Regarding 8 Washington Street/Seawall Lot 351 Changes to Street Configuration, Table 1: Roadway and Sidewalk Configuration Comparison, p. 3, January 25, 2013. Also on file are maps showing a comparison of the roadway and sidewalk configuration in the approved project and as proposed in the modified project. These documents are available for review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, California, in the project files for Case No. 2007.0030E.
³ Martin M. Ron Associates, Inc., Tentative Phased Final Map, Sheets 1 and 2, May 2012. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, California, in the project files for Case No. 2007.0030E.
### Table 1
Roadway and Sidewalk Configuration Comparison

<table>
<thead>
<tr>
<th>Location</th>
<th>Existing Conditions</th>
<th>Approved Project/Variant as defined in the FEIR</th>
<th>Street and Sidewalk Configuration Under the Proposed Legislation (underlined italics)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Drumm Street</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Roadway width</td>
<td>57 feet</td>
<td>49 feet</td>
<td>47 feet</td>
</tr>
<tr>
<td>Traffic lanes</td>
<td>1 each way; ±20 feet each</td>
<td>1 each way; ±16 feet each</td>
<td>1 each way; ±15 feet each</td>
</tr>
<tr>
<td>East sidewalk width</td>
<td>10 feet</td>
<td>18 feet</td>
<td>20 feet</td>
</tr>
<tr>
<td>East side on-street parking</td>
<td>13 spaces</td>
<td>8 spaces</td>
<td>8 spaces</td>
</tr>
<tr>
<td><strong>Washington Street</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Roadway width</td>
<td>74 feet</td>
<td>74 feet</td>
<td>60 to 67 feet</td>
</tr>
<tr>
<td>Traffic lanes</td>
<td>2 each way [c]; 11 ft. each WB; 13 ft. each EB</td>
<td>2 each way; 12 feet each</td>
<td>2 WB + 1 EB [d]; 10 feet each</td>
</tr>
<tr>
<td>Westbound approach to Drumm Street</td>
<td>2 lanes; 1 through/left turn + 1 through/right turn</td>
<td>2 lanes; 1 through/left turn + 1 through/right turn</td>
<td>2 lanes; 1 left-turn + 1 through/right turn</td>
</tr>
<tr>
<td>Center median</td>
<td>10 feet wide; landscaped</td>
<td>Eliminated</td>
<td>7 feet wide; landscaped</td>
</tr>
<tr>
<td>North sidewalk width</td>
<td>10 feet</td>
<td>± 20 feet</td>
<td>17 to 24 feet</td>
</tr>
<tr>
<td>North side on-street parking</td>
<td>9 spaces</td>
<td>5 spaces</td>
<td>3 spaces</td>
</tr>
<tr>
<td>South side on-street parking</td>
<td>13 spaces</td>
<td>13 spaces</td>
<td>7 spaces</td>
</tr>
<tr>
<td>Bike lanes</td>
<td>No</td>
<td>No</td>
<td>1 WB + 1 EB; 6 ft. WB, 5 or 6 ft. EB</td>
</tr>
<tr>
<td><strong>The Embarcadero</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>West sidewalk width</td>
<td>12 to 15 feet</td>
<td>15 feet</td>
<td>15 feet</td>
</tr>
</tbody>
</table>

Notes:

[a] From Washington Street to Drumm Street; no changes from existing conditions are being proposed for the west side parking or west sidewalk of Drumm Street.

[b] From The Embarcadero to Drumm Street; no changes from existing conditions are being proposed for the south sidewalk of Washington Street.

[c] Lanes not striped in the westbound direction.

[d] Left turn lanes are provided in the eastbound direction to access the underground garage, and at The Embarcadero intersection.

[e] From Broadway to Washington Street, no changes from existing conditions are being proposed for The Embarcadero roadway.

Source: Adavant Consulting, January 2013
- Sidewalk width increased from 18' to 20'.
- Roadway width decreased from 49' to 47'.
- Sidewalk width changed from 27' to 17' to allow for required lanes.
- Bulb-out radius revised per turning exhibits.
- Bulb-out radius revised per turning exhibits.
- Existing median to be replaced with new curbed median.
- Sidewalk width changed from 20' to 17-24'.
- Sidewalk width changed from 27' to 17' to allow for required lanes.
- Roadway width decreased from 74' to 60-67' with the addition of bike lanes.

**Figure 1: Comparison of Approved Project with Modified Project**

Source: SOM

2007.003.08
• A 32-foot-wide easement within the Jackson Street alignment (under the proposed Jackson Common) which contains SFPUC facilities, including the North Shore Force Main and certain subsurface sewer boxes and overflow structures. This easement would be vacated and then relocated so that its minimum width is maintained or expanded but its southern boundary is moved several feet north. The vacation and relocation of the easement would not require relocating any existing SFPUC facilities. The SFPUC facilities would be within Jackson Common, which will be maintained as open space. The project would occupy up to approximately 6 feet of the existing easement area or approximately 9 feet with the temporary shoring included. The project, including shoring, will be separated from the SFPUC facilities by at least 3.5 feet; the project without the shoring will be separated by at least 6 feet.

• A 45-foot-wide easement along the Drumm Street alignment for existing and future sewers, fire alarm circuits, and police communication lines. The portion of the easement within the project site would be vacated. The vacation and relocation of this easement would not require relocating any existing fire alarm circuits or police communication lines and the police and fire department have determined that they have no need for such easement. The SFPUC has an existing 12- to 21-inch storm drain/wwer line within this easement area that functions solely as a storm drain line that transfers water run-off collected by catch basins in the existing landscaped area to SFPUC facilities at the corner of Jackson and Drumm Street. Included within the project’s scope of work is the replacement and expansion of the existing Drumm Street walkway landscaped area. This landscaping work will include the installation of a new storm water and run-off collection system. This new system will adequately replace the existing SFPUC facilities and will be subject to the SFPUC’s approval during the permit review process. As a condition to the vacation of this easement, the SFPUC will obtain a relocated easement for storm water and sanitary sewer purposes located along the western boundary of the project area containing the new drainage system from Jackson Street to The Embarcadero.

• Two easements, one within the Drumm Street and Pacific Avenue alignments and another within Drumm Street between Pacific Avenue to The Embarcadero for light and air, surface drainage and emergency vehicles. The portion of the easements within the project site would be vacated and would be occupied by open space. Police and Fire have determined that they do not need this easement for emergency access as all structures in the area are otherwise accessible. SFPUC’s need for a surface drainage easement in this area would be replaced by the site drainage plan for the development as described above, and the SFPUC would obtain a relocated easement along the western boundary of the project area containing the new drainage system from Jackson Street to The Embarcadero. Light and air would be maintained along the remaining portion of the easement located on the adjoining Golden Gate Commons parcel to the west and addressed on the project site by the project plan calling primarily for open space in this area, which would be a dedicated public right-of-way for park and open space purposes.

• A 32-foot-wide easement within the Jackson Street alignment reserved to the San Francisco Redevelopment Agency (now the Successor Agency to the Redevelopment Agency of the City

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4 John Updike, Director of Real Estate, City and County of San Francisco. Email to Nannie Turrell, Planner, City and County of San Francisco. This document is available for review at 1650 Mission Street, Suite 400, San Francisco, CA. as part of Case No. 20007.0030E.

5 Ibid.
and County of San Francisco ("Successor Agency") for the benefit of the Pacific Telephone and Telegraph Company for the construction, operation, maintenance, and repair of underground telephone lines. The successor entity to Pacific Telephone and Telegraph Company, AT&T, has indicated that it has no facilities within this easement and has no objection to its vacation. To vacate this easement the Successor Agency would convey the easement to the City, which would then vacate the easement under the proposed ordinance.

The proposed ordinance also includes the approval and acceptance of a new easement from the project sponsor to the SFPUC for an existing SFPUC thrust block and a planned SFPUC underground vault structure located along The Embarcadero and an easement from the Port for the portion of the SFPUC’s North Shore Force Main facilities located on Port property within the project area.

Approvals Required

The modified project would require the following approvals:

- Adoption of an ordinance to (1) approve an encroachment permit for the project sponsor related to the construction and use of various public improvements affecting existing and future public rights-of-way on, under, or adjacent to the project site; (2) accept offers of public improvements for park and open space purposes on portions of the project site; (3) order the summary vacation of certain public service easements described previously that are in, on, or under portions of the project site benefiting various City departments, subject to conditions set forth in the Ordinance; (4) accept the determination by the Department of Public Works ("DPW"), as reflected in a DPW Order (number to be assigned) determining that a summary vacation of the public service easements is appropriate, subject to conditions specified; (5) accept and approve certain new and relocated SFPUC sewer easements and a new easement for an SFPUC underground vault; (6) authorize the SFPUC General Manager or the City’s Director of Property to enter into and record an agreement between the project sponsor and the SFPUC regarding coordination of the modified project with SFPUC facilities and the North Shore to Channel Force Main Project; (7) make environmental findings and findings of consistency with the San Francisco General Plan and the eight priority policies of San Francisco Planning Code Section 101.1; and (8) authorize official acts in connection with this ordinance. (San Francisco Board of Supervisors)

- Approval of SFPUC easement vacations and replacements, approval of new easements for an SFPUC underground thrust block and vault and for SFPUC’s other facilities within Seawall 351, approval of the subdivision map, and approval of an agreement with the developer authorizing SFPUC review of developer plans and specifications and setting forth conditions on developer to avoid effects to SFPUC facilities from project, and permit application review. (San Francisco Public Utilities Commission)

- Approval of a former Redevelopment Agency easement vacation. (Successor Agency to the Redevelopment Agency of the City and County of San Francisco.)

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6 Lynn Sousa, Public Works Coordinator, AT&T. Letter to Julian Snellgrove, Asst. Project Manager, Pacific Waterfront Partners, LLC. January 4, 2013. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, California, in the project files for Case No. 2007.0030E.
- Approval of changes to the roadway and sidewalk configuration of Washington Street and Drumm Street adjacent to the project site and approval of subdivision map. (San Francisco Department of Public Works, San Francisco Municipal Transportation Agency)
- Approval of demolition, grading, and building permits. (San Francisco Department of Building Inspection, San Francisco Department of Public Works)

ANALYSIS OF POTENTIAL ENVIRONMENTAL EFFECTS

San Francisco Administrative Code Section 31.19(c)(1) states that a modified project must be reevaluated and that “if, on the basis of such reevaluation, the Environmental Review Officer determines, based on the requirements of CEQA, that no additional environmental review is necessary, this determination and the reasons therefore shall be noted in writing in the case record, and no further evaluation shall be required by this Chapter.”

CEQA Guidelines Section 15164 provides for the use of an addendum to document the basis of a lead agency’s decision not to require a Subsequent or Supplemental EIR for a project that is already adequately covered in an existing certified EIR. The lead agency’s decision to use an addendum must be supported by substantial evidence that the conditions that would trigger the preparation of a Subsequent EIR, as provided in CEQA Guidelines Section 15162, are not present.

The Notice of Preparation/Initial Study (NOP/IS) for the 8 Washington Street/Seawall Lot 351 Project, published on December 8, 2007, analyzed the potential impacts of the originally proposed project. The NOP/IS eliminated the following topics from further study in the EIR: Land Use and Land Use Planning; Population and Housing; Historic Architectural Resources; Noise; Wind; Recreation; Utilities and Service Systems; Public Services; Biological Resources; Geology and Soils; Hydrology and Water Quality; Hazards and Hazardous Materials; Mineral and Energy Resources; and Agricultural Resources. The NOP/IS concluded that the project could result in potentially significant environmental impacts related to Aesthetics; Archaeological Resources; Transportation and Circulation; and Shadow, and that these topics required further study in the EIR. After the publication of the NOP/IS, the height of the project was modified in certain locations to be more consistent with the urban design recommendations of the Northeast Embarcadero Study. As a result of these changes to the project and in response to public comments on the NOP/IS, the Planning Department determined that, in addition to Aesthetics, Archaeological Resources, Transportation and Circulation, and Shadow, the topics of Land Use and Land Use Planning, Air Quality, Greenhouse Gas Emissions, and Recreation should be restudied in the EIR. Furthermore, the topic of Sea Level Rise was studied in the EIR due to increasing concern and awareness about this topic, and the topic of Biological Resources was restudied in the EIR due to the publication of the Planning Department’s draft Standards for Bird-Safe Buildings after publication of the NOP/IS.

The FEIR for the 8 Washington Street/Seawall Lot 351 Project concluded that the approved project would result in some environmental impacts that cannot be reduced to less-than-significant levels:

- Transportation and Circulation: The project would make a cumulatively considerable contribution to significant cumulative impacts at study intersections;
- Air Quality: Construction of the project would expose sensitive receptors to substantial levels of \( PM_{2.5} \) and other toxic air contaminants (TACs), including diesel particulate matter;
- Air Quality: The project would expose new (on-site) sensitive receptors to cumulatively considerable levels of \( PM_{2.5} \) and other TACs from off-site and on-site sources;
• Air Quality: Project construction activities would result in a cumulatively considerable contribution to cumulatively significant levels of PM$_{2.5}$ and other TACs on off-site receptors; and
• Sea Level Rise: The project would expose people or structures to increased risk of flooding due to climate-induced sea level rise.

Where feasible, mitigation measures were identified to avoid, eliminate, or reduce significant adverse impacts of the project to less-than-significant levels. Improvement measures were also identified to reduce less-than-significant impacts of the project.

The NOP/IS identified the following mitigation measures for the originally proposed project:

• Mitigation Measure Noise 1: Construction Noise – to reduce noise levels during construction;
• Mitigation Measure Noise 2: Title 24 Compliance – to minimize interior noise levels for the proposed buildings;
• Mitigation Measure Air Quality 1: Construction Air Quality – to reduce dust and to minimize exhaust, particulate, and pollutant emissions during demolition, excavation, and construction;
• Mitigation Measure Biology 1: Protection of Birds During Tree Removal – to protect nesting birds during construction;
• Mitigation Measure Hazards 1: Flammable Vapors During Construction – to control flammable vapors during construction; and
• Mitigation Measure Hazards 2: Vapor Intrusion during Operation – to control vapor intrusion into the proposed buildings or, if necessary, remove vapor sources.

The FEIR identified the following additional mitigation measures for the approved project:

• Mitigation Measures M-CP-1a: Archaeological Testing, Monitoring, and Data Recovery and Reporting; M-CP-1b: Interpretation; and M-CP-6: Accidental Discovery – to avoid significant impacts on buried or submerged historical resources that are known or may be accidentally discovered;
• Mitigation Measure M-TR-9: Travel Demand Management Plan – to reduce the project’s cumulatively considerable contribution to cumulative traffic impacts;
• Mitigation Measure M-AQ-3: Construction Equipment – to reduce exhaust, particulate, and pollutant emissions during demolition, excavation, and construction;
• Mitigation Measure M-AQ-6: Emergency Generator Emissions Standards and Operating Hours – to ensure that the project’s emergency generators do not result in significant impacts to the health of on- and off-site sensitive receptors;
• Mitigation Measure M-AQ-7: Building Design and Ventilation Requirements – to protect the project’s residents from nearby toxic air contaminants when the residents are indoors;
• Mitigation Measure M-SLR-3: Emergency Plan – to reduce exposure of people and structures to the risk of flooding from climate-induced sea level rise;
• Mitigation Measure M-BI-2: Vegetation Removal During the Non-Breeding Season or Preconstruction Survey – to avoid impacts to nesting birds during vegetation removal activities; and

• Mitigation Measure M-BI-4: Conformity with the Planning Department’s Standards for Bird-Safe Buildings – to ensure that the project would not result in a significant impact related to bird strikes.

The FEIR identified the following improvement measures for the approved project:

• Improvement Measure TR-1: Garage Signage – to minimize the possibility of traffic congestion due to vehicles queuing on Washington Street when entering the project’s garage;

• Improvement Measure TR-3: Pedestrian Alert Device – to alert pedestrians when a vehicle is exiting the project’s garage;

• Improvement Measure TR-8a: Limitation on Trucking Hours – to minimize construction traffic occurring during morning and evening peak traffic hours; and

• Improvement Measure TR-8b: Agency Consultation – to determine the best method for minimizing traffic congestion and potential effects on pedestrian or bicycle circulation during construction.

The mitigation measures identified for the originally proposed project analyzed in the NOP/IS are still applicable to the modified project. Therefore, the modified project would implement all of the mitigation and improvement measures identified in the NOP/IS and FEIR.

The modified project, as demonstrated below, would not result in any new significant environmental impacts, substantial increases in the significance of previously identified effects, or necessitate implementation of additional or considerably different mitigation or improvement measures than those identified in the FEIR. The effects associated with the modified project would be substantially the same as those reported for the approved Larger Fitness Center Variant in the 8 Washington Street/Seawall Lot 351 Project FEIR, but the topics below warrant further discussion.

**Transportation**

The modified project has different sidewalk and street configurations from those described for the proposed project in the FEIR on p. II.19 and shown in Figure II-11: Larger Fitness Center Variant Site Plan (p. II.19b). Additionally, since certification of the FEIR, the Golden State Warriors have released plans to build a new basketball arena complex on Piers 30-32 and Seawall Lot 330. A transportation technical memorandum from Adavant Consulting analyzing the potential transportation and circulation impacts of these changes has been prepared and is the basis for the discussion below.

Under the modified project, the existing Washington Street median, which is 10 feet wide, would not be completely eliminated as described in the FEIR; instead, it would be replaced by a median, which is narrower than the existing median by 3 feet. In addition, the new expanded sidewalks would be 3 or 4 feet wider in places as compared to those described in the FEIR. Under the modified project, striped

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7 Adavant Consulting, Transportation Technical Memorandum Regarding 8 Washington Street/Seawall Lot 351 Changes to Street Configuration, January 25, 2013. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, California, in the project files for Case No. 2007.0030E.
bicycle lanes on both the north and south sides of Washington Street would be added, and a total of 12 existing on-street parking spaces on the north and south sides of Washington Street would be eliminated, eight more spaces than would be eliminated under the approved project. A traffic lane on Washington Street would be eliminated and traffic lane widths would also change slightly on Washington and Drumm Streets. One eastbound lane on Washington Street from Washington to The Embarcadero would be eliminated, and all traffic lanes in this block of Washington Street would narrow from 12 feet to 10 feet. This is two feet less than the lanes described for the approved project. On Drumm Street, between Washington Street and Jackson Street lanes would narrow to 15 feet each, which is one foot less than the approved project.

Traffic and Circulation

The modified project would not change the land use types or intensities of the approved project analyzed in the FEIR and, therefore, would not affect the number of trips generated by the project or the modes of travel. The modified project would eliminate one eastbound traffic lane on Washington Street, between Drumm Street and The Embarcadero, which would be replaced in part by an exclusive left turn lane into the project’s parking garage, while the approach to The Embarcadero would remain unchanged. The lanes would remain within dimensions acceptable in San Francisco, and would not affect the intersection level of service (LOS) analyses, results, and findings presented in the FEIR. As with the approved project, the configuration of eastbound Washington Street under the modified project would continue to include one left- and one right-turn lane of sufficient length to accommodate the expected future traffic and would not create queuing that could affect traffic operation on Washington Street. Thus, the vehicle traffic analyses, results, and conclusions for the approved project presented in the FEIR would not be affected by the modified project. For these reasons, the modified project would not result in any new significant traffic and circulation impacts that were not already analyzed for the approved project in the FEIR.

Truck Circulation and Access

The new street configurations under the modified project would not be expected to negatively affect truck turning maneuvers at these locations. The transportation memorandum analyzed truck turning movements near the project site that take into consideration the street widening and curb bulb-outs in the modified project and found they would be able to turn unimpeded. In addition, the transportation memorandum studied truck maneuvers into and out of the loading docks at Drumm Street and determined that they could be performed unimpeded. Thus, the truck circulation analyses, results and conclusions for the approved project presented in the FEIR would still be applicable to the street configurations under the modified project. For these reasons, the modified project would not result in any new significant truck circulation and access impacts that were not already analyzed for the approved project in the FEIR.

Passenger Pick-up and Drop-off

As with the approved project, passenger loading and unloading would occur in front of the main entrance on Washington Street, which would be used as a residential and restaurant pick-up and drop-off area (white zone) by taxis and private vehicles. Under the modified project, the passenger drop-off would be reduced from a five-vehicle length (analyzed in the FEIR) to a three-vehicle length. Both restaurants and residential buildings in San Francisco typically have a one- or two-vehicle-long white zone. Observation of the passenger drop-off in front of two nearby restaurants during the midday and
evening peak hours showed an average drop-off of fewer than one vehicle per single white zone space every 30 minutes, which could be accommodated within the three-vehicle white zone proposed by the ordinance, even with surges in vehicle arrivals. Thus, the reduction in the length of the modified project’s passenger drop-off/pick-up zone would not be expected to cause any undue traffic congestion on Washington Street, and the traffic operations and passenger loading/unloading analyses, results, and conclusions for the approved project presented in the FEIR would be still be applicable to the changes under the modified project. For these reasons, the modified project would not result in any new significant traffic operations and passenger loading/unloading impacts that were not already analyzed for the approved project in the FEIR.

**Transit**

The modified project would not change the land use types or intensities analyzed in the FEIR and, therefore, would not change the expected number of transit trips generated. Similarly, the roadway configuration under the modified project would not affect any street where transit service is currently being provided or would be expected to be provided in the future. Thus, there would not be any substantial changes to the transit impact analysis or conclusions as presented in the FEIR. For these reasons, the modified project would not result in any new significant transit impacts that were not already analyzed for the approved project in the FEIR.

**Pedestrians**

The modified project would not change the land use types or intensities analyzed in the FEIR and, therefore, would not change the expected number of pedestrian trips generated. Sidewalk LOS analyses were conducted as part of the FEIR and were determined to be LOS B or better for the approved project. Under the modified project, the LOS would be expected to improve due to the wider sidewalk widths. Thus, there would not be any substantial changes to the pedestrian impact analysis or conclusions as presented in the FEIR. For these reasons, the modified project would not result in any new significant pedestrian impacts that were not already analyzed for the approved project in the FEIR.

**Bicycles**

The modified project would not change the land use types or intensities analyzed in the FEIR and, therefore, would not change the expected number of vehicle or bicycle trips compared to the approved project. The modified project would add one eastbound and one westbound striped bicycle lane (Class II) on the curb side of Washington Street, between Drumm Street and The Embarcadero; the bicycle lanes would be 6 to 7 feet wide. The FEIR did not identify any significant bicycle impacts due to the approved project. The provision of Class II bicycle lanes on Washington Street would help prevent potential conflicts between bicycles and motor vehicles in front of the modified project’s main entrance and garage driveway. Thus, there would not be any substantial changes to the bicycle impact analysis or conclusions as presented in the FEIR. For these reasons, the modified project would not result in any new bicycle impacts that were not already analyzed for the approved project in the FEIR.

**Emergency Vehicle Access**

The modified project would reduce the turning radii and lane widths at some locations from those described in the FEIR, as well as the eastbound lane configuration on Washington Street, between Drumm Street and The Embarcadero. As noted above, these changes would not result in a noticeable adverse change in traffic congestion, measured as intersection LOS. Due to the narrowing of the
roadways adjacent to the project site under the modified project, some emergency vehicles could be expected to have some added difficulties in negotiating the turns. An updated analysis of fire truck turning movements showed that an articulated fire truck would be able to turn unimpeded at the study intersections. An updated analysis of fire truck turning movements showed that an articulated fire truck would be able to turn unimpeded at the study intersections. Therefore, there would not be any substantial changes to the emergency vehicle impact analysis or conclusions as presented in the FEIR. For these reasons, the modified project would not result in any new significant emergency vehicle access impacts that were not already analyzed for the approved project in the FEIR.

**Construction**

The modified project would not increase the number of construction personnel or proposed construction schedule required to build the approved project as described in the FEIR. The number of construction-related trucks would also be expected to remain the same as under the approved project (FEIR, p. VII.5). Thus, the modified project would not affect the construction impact analysis or conclusions as presented in the FEIR.

**Parking**

The modified project would not change the land use types or intensities analyzed in the FEIR and, therefore, would not change the expected parking demand reported in the FEIR. The elimination of 14 metered on-street parking spaces adjacent to the project site was considered in the FEIR (p. IV.D.29); the modified project would eliminate eight additional on-street parking spaces, two on the north side of Washington Street, and six on the south side. As described in the FEIR, San Francisco does not consider parking supply as part of the permanent physical environment and, therefore, does not consider changes in parking conditions to be environmental impacts as defined by CEQA. Since on-street peak parking occupancy in the study area during the midday peak under existing conditions is less than 90 percent (FEIR p. IV.D.16), it is expected that existing on-street parking supply will be able to accommodate the elimination of those spaces. Thus, there would not be substantial changes to the parking conditions analysis or conclusions as presented in the FEIR. For these reasons, the modified project would not result in any new significant parking impacts that were not already analyzed for the approved project in the FEIR.

**2035 Cumulative Conditions**

As stated on FEIR p. IV.D.32, the future year 2035 cumulative transportation analyses conducted for the 8 Washington Street/Seawall Lot 351 Project account for cumulative development in the area, including, among others, a potential 850,000-gsf mixed-use development project (including 230 residential units) at Piers 30-32 and Seawall Lot 330. After certification of the FEIR, the Golden State Warriors released plans to build a new basketball arena complex on Piers 30-32 and Seawall Lot 330 (GSW project), for which the environmental review has not yet been initiated. Excluding the arena, the GSW project would be less physical development than had previously been considered in the FEIR for Piers 30-32 and Seawall Lot 330. Thus, the results presented in the FEIR would still be considered valid during non-arena event days.

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8 The GSW project proposes an 18,000-seat arena, approximately 60,000 gsf of training and supporting facilities, and approximately 105,000 gsf of retail uses on Piers 30-32. In addition, up to 130 dwelling units, 250 hotel rooms, and 34,000 gsf of retail uses would be located on Seawall Lot 330.
If the GSW project is approved and constructed, the future cumulative transportation conditions are currently unknown, since no environmental analyses have been completed. However, the typical start time for a basketball game is about 7:30 p.m. on a weekday, outside the period of analysis of future year 2035 cumulative transportation conditions conducted for the weekday evening peak commute hour.

Given that Golden State Warrior games would be 1½ hours after peak evening commute hour, non-sports-related development of the GSW project would be less intense than previously analyzed, and all of the study intersections evaluated in the FEIR are located at or north of Market Street, the results of the 2035 cumulative transportation analyses presented in the FEIR would not be expected to deviate substantially from the results that could be expected on a game day should the GSW project be constructed.

**Conclusion**

In conclusion, based on the analyses presented in the transportation memorandum prepared for the modified project, there would be no substantial changes to the transportation conditions, findings, or conclusions presented in the 8 Washington Street/Seawall Lot 351 Project FEIR as a result of the modified project calling for street and sidewalk configuration changes adjacent to the project site and the proposed GSW project. The modified project would have similar transportation and circulation impacts when compared to the approved Larger Fitness Center Variant. The modified project would not result in any new significant impacts on transportation and circulation that were not already analyzed for the approved project in the FEIR.

**Recreation**

The modified project would increase the amount of open space by 2,135 sf. As discussed on pp. VII.7-VII.9 of the FEIR, the Larger Fitness Center Variant would have less-than-significant impacts on recreation resources. The modified project would have the same number of dwelling units and the same amount of athletic club and restaurant/retail space as the Larger Fitness Center Variant. Therefore, the modified project would generate the same demand for recreation resources and would have the same less-than-significant impacts on recreation resources as would the approved Larger Fitness Center Variant. The modified project would not result in any new significant impacts on recreation resources that were not already analyzed for the approved project in the FEIR.

**Utilities and Service Systems**

As discussed under Project Description, above, the modified project includes changes to a number of existing public service easements in, on, and under the project site. Public service easements may be summarily vacated if the easements have not been used for 5 consecutive years, are determined to be excess or are superseded by relocation. The modified project also includes the grant of new easements for SFPUC facilities located on property within the project area. The grant of the new easements will not result in environmental effects – the sole purpose of such grants is to notify parties of the SFPUC’s facilities and to assure that SFPUC has continued access to and use of its facilities. The facilities themselves are either existing facilities or facilities that SFPUC is in the process of constructing under its approved North Shore to Channel Force Main Project.

Of the easements to be vacated, two currently have utilities located within the easement areas. These are discussed below. The other public service easements either are not currently used and are not needed or their intended purpose will be served by the project. The easements reserved for fire alarm circuits,
police communications, emergency access and underground telephone lines that would be vacated are not used for these purposes now and are not needed according to the Police, Fire, and Technology departments of the City and AT&T. The easement for light and air that would be vacated is within the portion of the project that will be dedicated as public right of way for park and open space purposes, so its intended function will be met without the easement.

Two of the easements to be vacated currently contain utilities. As discussed previously, the 45-foot-wide easement along the Drumm Street alignment for existing and future sewers, contains an existing SFPUC 12- to 21-inch storm drain/sewer line that currently functions as a storm drain line. Included within the project’s scope of work analyzed in the FEIR is the installation of a new storm water and run-off collection system. This new system will adequately replace the existing SFPUC facilities and will be subject to the SFPUC’s approval during the permit review process. The two easements in the Drumm Street and Pacific Avenue alignments for surface drainage also would be replaced with the new storm water and run-off collection system for the project. The SFPUC would obtain a new relocated easement containing the drainage system for the project.

A 32-foot-wide easement is within the former Jackson Street alignment (under the proposed Jackson Common) and contains SFPUC facilities, including a portion of the subsurface North Shore Force Main and certain subsurface sewer boxes and overflow structures. Under the modified project, this easement would be vacated, and the project sponsor and the Port would provide a new easement with a minimum width of 32 feet in a location acceptable to the SFPUC (see Figure 2). While it was originally believed that the project buildings were located up to, but not within the easement area, further research has determined that the project building encroaches six feet into the easement area. However, vacation and relocation of this easement would not require relocation of SFPUC facilities as there would remain a minimum of 3.5 feet between the SFPUC facilities and the project structures (including the project shoring wall).

Construction of the building within a portion of the existing SFPUC easement area would not result in significant impacts for the reasons explained in the Initial Study to the FEIR. The Initial Study examined whether the project had the potential to adversely affect structures due to geological conditions or seismic events, and also examined whether construction activities, such as pile driving, could adversely affect adjacent structures. The project sponsor performed a preliminary geotechnical study to address geotechnical issues regarding development of the project site. The study concludes that the proposed project is feasible from a geotechnical standpoint and that the primary geotechnical concerns for the site are the presence of liquefiable soil and soft and weak compressible clays of the Bay Mud, property foundation support, and selection of a rigid shoring system. The sponsor has agreed to follow the recommendation of the report in constructing the project, consistent with, or in addition to any permit requirements. A detailed geotechnical investigation would be conducted to develop specific design criteria for the project prior to development of final project plans, permit applications and approvals.

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9 Martin M. Ron Associates, Inc., Detail Showing Proposed Changes to Sewer Easement, October 2, 2012. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, California, in the project files for Case No. 2007.0030E.

10 Initial Study Figures 15 and 16 show the project buildings abutting, but not in this easement.
FIGURE 2: PROPOSED CHANGES TO SFPUC EASEMENT
The Initial Study concludes that the Building Code requirements and the requirements of the California Seismic Hazards Mapping Act would require reports and plans that will be reviewed by the Department of Building Inspection to assure that project design and construction features avoid hazards to adjacent structures. During its review, DBI would determine whether the plans contain necessary engineering and design features for the project to avoid potential damage both to new structures built, and adjacent structures that could be affected by new structures and to ensure compliance with all San Francisco Building Code provisions regarding structural safety. As the Initial Study indicates, DBI would require the geotechnical report done in support of the building plans to address potential settlement and subsidence effects of excavation, dewatering, and pile driving and to determine whether a lateral movement and settlement survey should be done to monitor any movement or settlement of surrounding buildings, structures and adjacent streets. The San Francisco Building Code incorporates State law, requiring the project sponsor to protect the adjoining land and any structure thereon, and imposes liability for any resulting damage.\(^\text{11}\) DBI can require a Special Inspector to be retained to perform monitoring and to require corrective actions during construction to halt any settlement.

The geologic conditions under the project site have not changed since publication of the NOP/IS. Therefore, the geotechnical information and analysis presented on pp. 80-86 of the NOP/IS, including the required building permit review process administered by the DBI, continues to be applicable to the modified project.

In addition, the architecture and engineering firms that have been consulted and will be implementing the modified project have provided letters affirming that the SFPUC facilities would be protected during the construction and operation of the modified project and during seismic events. These letters include representations that are summarized below.

- **Cahill Contractors, Inc.** (Cahill), is the lead contractor responsible for overseeing shoring, monitoring, and dewatering activities during the construction of the modified project. Cahill will develop the shoring design in collaboration with the shoring engineer and construct the shoring system. Along with the building permit application(s), the shoring design will be submitted to the DBI for their review and approval. Once constructed, the shoring system will be subject to ongoing monitoring for vibration, settlement, and horizontal or vertical movement, as discussed on p. 85 of the NOP/IS. Cahill will develop and implement the monitoring plan in collaboration with the geotechnical engineer of record, the building structural engineer of record, a shoring engineer, a surveyor, and a monitoring consultant. Cahill will develop a site-specific dewatering plan for removing groundwater from the construction site during excavation activities, as discussed on p. 85 of the NOP/IS. Upon review and approval of the dewatering plan by the San Francisco Department of Public Works and the San Francisco Department of Public Health, Cahill will implement and monitor the dewatering system.\(^\text{12}\)

- **Rollo & Ridley, Inc.** (Rollo & Ridley) is the geotechnical engineer of record. In a geotechnical report dated July 9, 2012, Rollo & Ridley provided geotechnical design criteria to be used in

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\(^{11}\) California Building Code, Section 3307 and California Civil Code Section 832 require protection of adjacent structures during construction. In the case of adjacent City facilities, DBI will route building plans to SFPUC for its review and concurrence that the plans adequately protect adjacent SFPUC facilities.

\(^{12}\) Chuck Palley, President, Cahill Contractors, Inc., Letter regarding shoring, monitoring, and dewatering activities, January 17, 2013. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, California, in the project files for Case No. 2007.0030E.
designing a shoring system to protect surrounding improvements, including streets, sidewalks, and SFPUC facilities. Rollo & Ridley reviewed the preliminary shoring drawings and calculations that were developed by the shoring engineer and concluded that the geotechnical aspects of the preliminary shoring drawings and calculations are in general conformance with the geotechnical information and analysis presented on pp. 80-86 of the NOP/IS.³³

- Timothy C. Mathison, Principal, Vice President, Tuan and Robinson Structural Engineers, Inc., is the shoring engineer who prepared the preliminary shoring drawings. The shoring system shown in the preliminary shoring drawings is a reasonable approach for sustaining the adjacent ground and protecting the adjacent SFPUC facilities during construction of the modified project.⁴⁴

- Mark Sarkisian, Director, Structural Engineering, SOM (Skidmore, Owings & Merrill LLP), is the architect and building structural engineer of record. SOM designed the modified project and its structural systems, including the superstructure, substructure, and foundation systems. SOM represents that the substructure and foundation systems were designed with the proximity of the SFPUC facilities to the project site in mind. The proposed basement walls, mat foundation, and piles have been located such that construction activities would have sufficient clearance from the SFPUC facilities. SOM also developed calculations showing how the lateral force generated during a seismic event would be carried through the building’s superstructure, down to the basement substructure, and into the foundation system (a conventional mat foundation supported by piles, as was analyzed in the NOP/IS). These calculations, which will be reviewed by the DBI as discussed on pp. 82-83 of the NOP/IS, were developed to understand the amount of lateral force the building may impose on the soil and, potentially, the SFPUC facilities. SOM concluded that, with the completed building in place, there would be an insignificant increase in the potential for damage to the SFPUC facilities during a seismic event.⁵⁵

SFPUC staff have commented on this Addendum, and agree with the information and conclusions contained herein.⁶⁶ The effectiveness of the SFPUC’s vacation of its 32-foot-wide easement will be conditioned on the SFPUC and the project sponsor entering into a written and recorded agreement that, among other things, addresses the SFPUC’s review and approval of the project’s plans, specifications, and construction methods, and sets forth conditions on the project sponsor designed to avoid adverse impacts

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²³ Christopher Ridley, Principal Engineer, and Frank Rollo, Principal Engineer, Rollo & Ridley, Inc., Letter regarding geotechnical review of preliminary shoring drawings and calculations, January 14, 2013. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, California, in the project files for Case No. 2007.0030E.

⁴⁴ Timothy Mathison, Tuan and Robinson Structural Engineers, Inc., Letter regarding preliminary shoring drawings, January 17, 2013. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, California, in the project files for Case No. 2007.0030E.

⁵⁵ Mark Sarkisian, Skidmore, Owings & Merrill LLP, Letter regarding easements, seismic events, and SFPUC facilities, January 16, 2013. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, California, in the project files for Case No. 2007.0030E.

⁶⁶ Michael Carlin. Email to Bill Wyckoff, Environmental Review Officer, and Nannie Turrell, Planner, San Francisco Planning Department, February 20, 2013. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, California, in the project files for Case No. 2007.0030E.
on SFPUC facilities (including the North Shore Force Main), the North Shore to Channel Force Main Project, and the SFPUC's ability to operate, maintain, repair, modify, expand, or replace the SFPUC facilities.

For these reasons, the modified project would have the same less-than-significant impacts on utilities and service systems as would the originally proposed project or the approved Larger Fitness Center Variant. The modified project would not result in any new significant impacts on utilities and service systems that were not already analyzed for the originally proposed project in the NOP/IS or for the approved project in the FEIR.

**CONCLUSION**

Based on the foregoing, the Planning Department concludes that the analyses conducted and the conclusions reached in the FEIR certified on March 22, 2012 remain valid, and that no supplemental environmental review is required for the proposed project modifications. The modified project would not cause new significant impacts not identified in the FEIR or result in a substantial increase in the severity of previously identified significant impacts. No changes have occurred with respect to circumstances under which the original project was undertaken that would cause significant environmental impacts to which the modified project would result in a cumulatively considerable contribution. There is no new information that shows that the modified project would cause new significant environmental impacts that were not already analyzed in the FEIR. Therefore, pursuant to San Francisco Administrative Code Section 31.19(c)(1) and CEQA Guidelines Section 15164, no supplemental environmental review is required beyond this addendum.

I do hereby certify that the above determination has been made pursuant to State and Local requirements.

**DATE February 25, 2013**

Bill Wycko, Environmental Review Officer for John Rahaim, Director of Planning