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Preliminary Mitigated Negative Declaration

Date:	January 26, 2011
Case No.:	**2008.0723E**
Project Title:	1255-1275 Columbus Avenue
Zoning:	C-2 (Community Business District) 40-X Height and Bulk District
Block/Lot:	0028/014
Lot Size:	16,622 square feet
Project Sponsor	Bruce Baumann, representing Russian Hill Corners LLC, (415) 551-7884
Staff Contact:	Chelsea Fordham – (415) 575-9071 Chelsea.Fordham@sfgov.org

PROJECT DESCRIPTION

The proposed project would involve demolition of an existing 15,852-square-foot, 32 feet in height office building built in 1954 and construction of a new 54,420-square-foot, 40 feet in height, mixed-use building. The proposed new building would include 20 residential units, 6,215 square feet of ground-floor commercial space, and 20 off-street parking spaces. The proposed parking garage would be accessed from Columbus Avenue and would contain 20 off-street parking spaces for the 20 residential units. The commercial space would be accessed from Columbus Avenue at the intersection of Columbus Avenue and North Point Street, and would include two spaces of approximately 2,230 square feet and 4,250 square feet, respectively. The 16,622 square-foot project site is located on the east side of Columbus Avenue at the northwest corner of the intersection of Columbus Avenue, North Point Street, and Leavenworth Street in the Russian Hill neighborhood of San Francisco. The project site is located in a C-2 (Community Business District) Use District, the Waterfront Special Use District No. 2, and a 40-X Height and Bulk District. The project would require a variance from the Planning Code Sections 151, 134, and 155 for the off-street parking requirements for commercial uses exceeding 5,000 square feet, from the rear yard requirements, and from the prohibition of vehicular access to off-street parking along Columbus Avenue.

FINDING

This project could not have a significant effect on the environment. This finding is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15064 (Determining Significant Effect), 15065 (Mandatory Findings of Significance), and 15070 (Decision to prepare a Negative Declaration), and the following reasons as documented in the Initial Evaluation (Initial Study) for the project, which is attached.

Mitigation Measures are included in this project to avoid potentially significant effects. See pages 91 to 95.

cc: Russian Hills Corners LLC, Project Sponsor
Kevin Guy, Neighborhood Planner, Northeast Quadrant
Distribution List
Supervisor David Chui, District 3
Bulletin Board
Master Decision File

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INITIAL STUDY

Case Number 2008.0723E – 1255-1275 Columbus Avenue

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INITIAL STUDY

Case Number 2008.0723E –1255-1275 Columbus Avenue

A. PROJECT DESCRIPTION

Project Location

The project site (Assessor's Block 0028, Lot 014) is a 16,622-square-foot lot located on the west side of Columbus Avenue at the northwest corner of the intersection of Columbus Avenue, North Point, and Leavenworth Streets, in San Francisco's Russian Hill neighborhood (see Figure 1, Project Site Location, page 3). The project site has an irregular-shaped lot that has six different sides that have varying widths of 258 feet, 107 feet, and 60 feet, and length of 120 feet, 90 feet, and 41 feet. The project site is at an elevation of approximately 16.5 feet above Mean Sea Level (MSL) and slopes downward from the northeast at an average inclination of 20:1. The subject property is currently occupied by a 15,852-square-foot, 32-foot-tall office building, with 21 off-street parking spaces located in a surface parking lot. The project site is located in a C-2 (Community Business District) Use District, the Waterfront Special Use District No. 2, and a 40-X Height and Bulk District.

Project Characteristics

The proposed project involves demolition of the 15,852-square-foot office building and surface parking lot, and construction of a 54,420-square-foot, 4-story, 40-foot tall, mixed-use building (see Figures 2- 9). The proposed building would contain 6,215 square feet of commercial space at the ground floor in two different commercial spaces, 20 residential units on the second through fourth floors, and 20 off-street parking spaces in a ground-floor garage, which would have vehicular access from a driveway located off Columbus Avenue. The two proposed commercial spaces would have pedestrian access from Columbus Avenue and the intersection of Columbus Avenue and North Point Street.

The proposed building would cover the entire site at grade level, with privately accessible open space provided at the southeast rear corner of the building's second floor as described below. The proposed building would include approximately 31,480 gross square feet (gsf) of residential space, 6,215 gsf of commercial space, and 9,685 gsf garage for a total gross square-footage of approximately 54,420 gsf.

The proposed 20 residential units would include four two-bedroom units, fifteen three-bedroom units and one four-bedroom unit. The private rear yard and deck at the first residential level (the building's second level)

would total approximately 1,525 square feet. Additionally, 10 residential units would have approximately 100 square feet of open space in the form of private decks.

The project sponsor would provide one parking space per dwelling unit for a total of 20 off-street parking spaces. No parking spaces would be provided for the commercial space. The ground-floor level would provide parking for 20 vehicles with six compact spaces and 14 standard spaces. As stated above, off-street parking would be accessed from Columbus Avenue. Additionally, the proposed project would result in the removal of approximately 12 significant trees and seven street trees

The majority of the project site would be constructed at grade with the exception of the southwest corner, which would require excavation to 9.5 feet. Construction activities would last for approximately 16 months including grading the site and construction of the proposed project. The project sponsor for the project is Russian Hills Corners LLC and the project architect is Levy Design Partners. The estimated construction costs for the project is $6,600,000.

REQUIRED APPROVALS

The proposed project would require the following approvals:

- Variance from the off-street parking requirements for commercial uses exceeding 5,000 square-feet (Planning Code Section 151).
- Variance from the prohibition of vehicular access from the abutting portion of Columbus Avenue (Planning Code Section 155).
- Variance by San Francisco Planning Department for rear yard requirements (Planning Code Section 134)
- Approval by the Planning Department of building permits for demolition and new construction.
- Approval by the Department of Building Inspection for demolition and site permits.
- Approval by the Bureau of Streets and Mapping of the Department of Public Works for street and sidewalk permits.
- Approval by the San Francisco Municipal Transportation Agency (SFMTA) for any curb, road, or transit modifications.
- Approval by the San Francisco Public Utilities Commission (SFPUC) Wastewater Enterprise, Urban Watershed Management Program (UWMP) of a Stormwater Control Plan and Operation and Management Plan demonstrating compliance with the requirements of the Stormwater Design Guidelines (SDG) is required prior to issuance of building permits

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CITY AND COUNTY OF SAN FRANCISCO
PLANNING DEPARTMENT

1255-1275 Columbus Ave

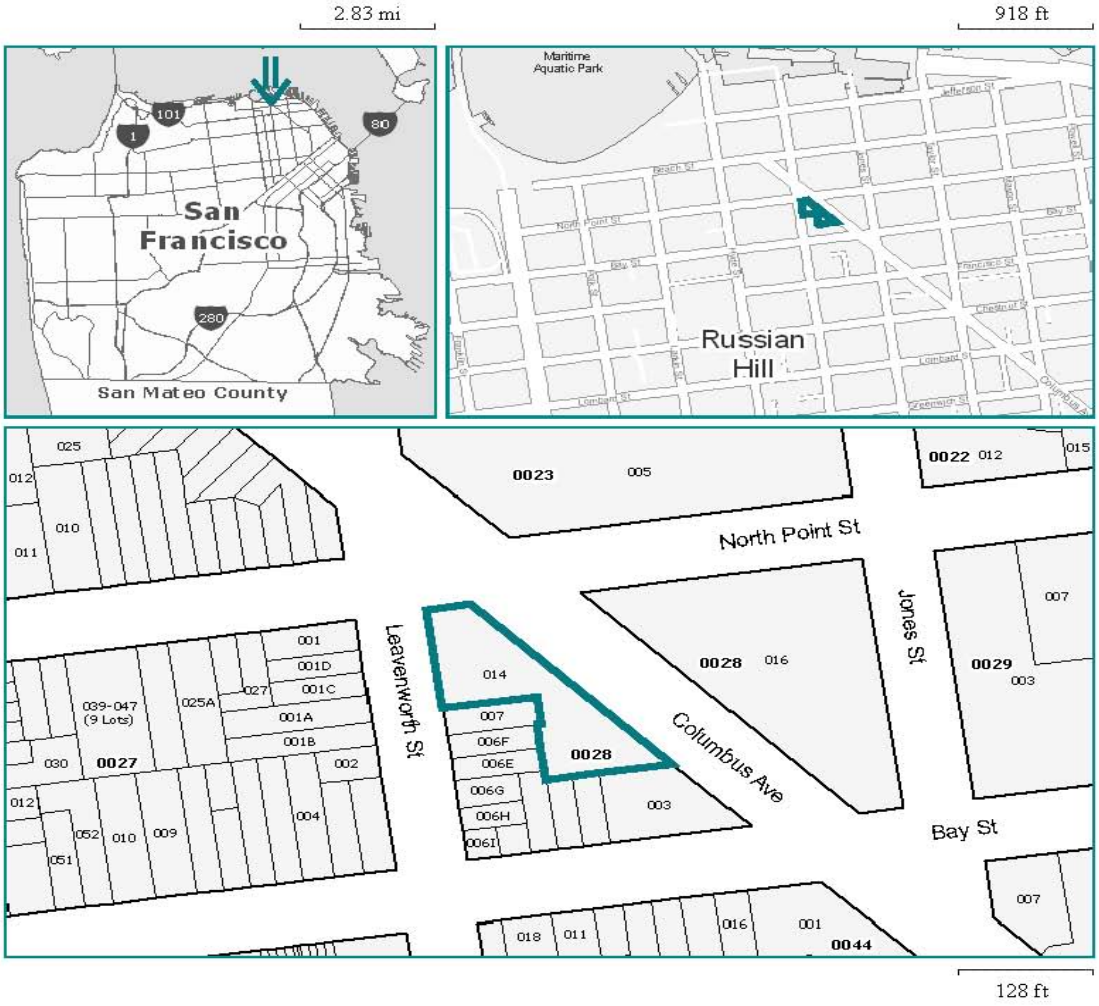
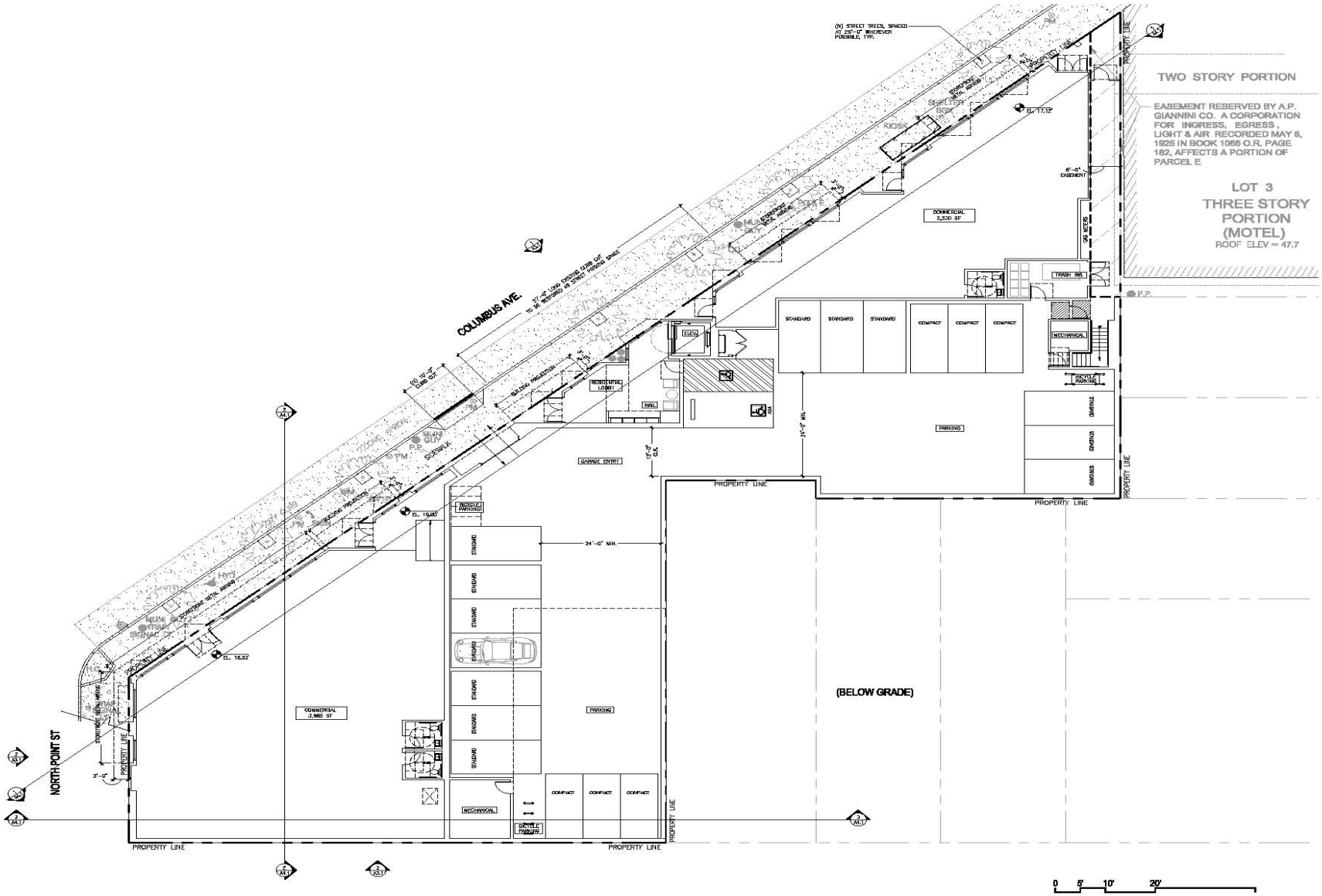
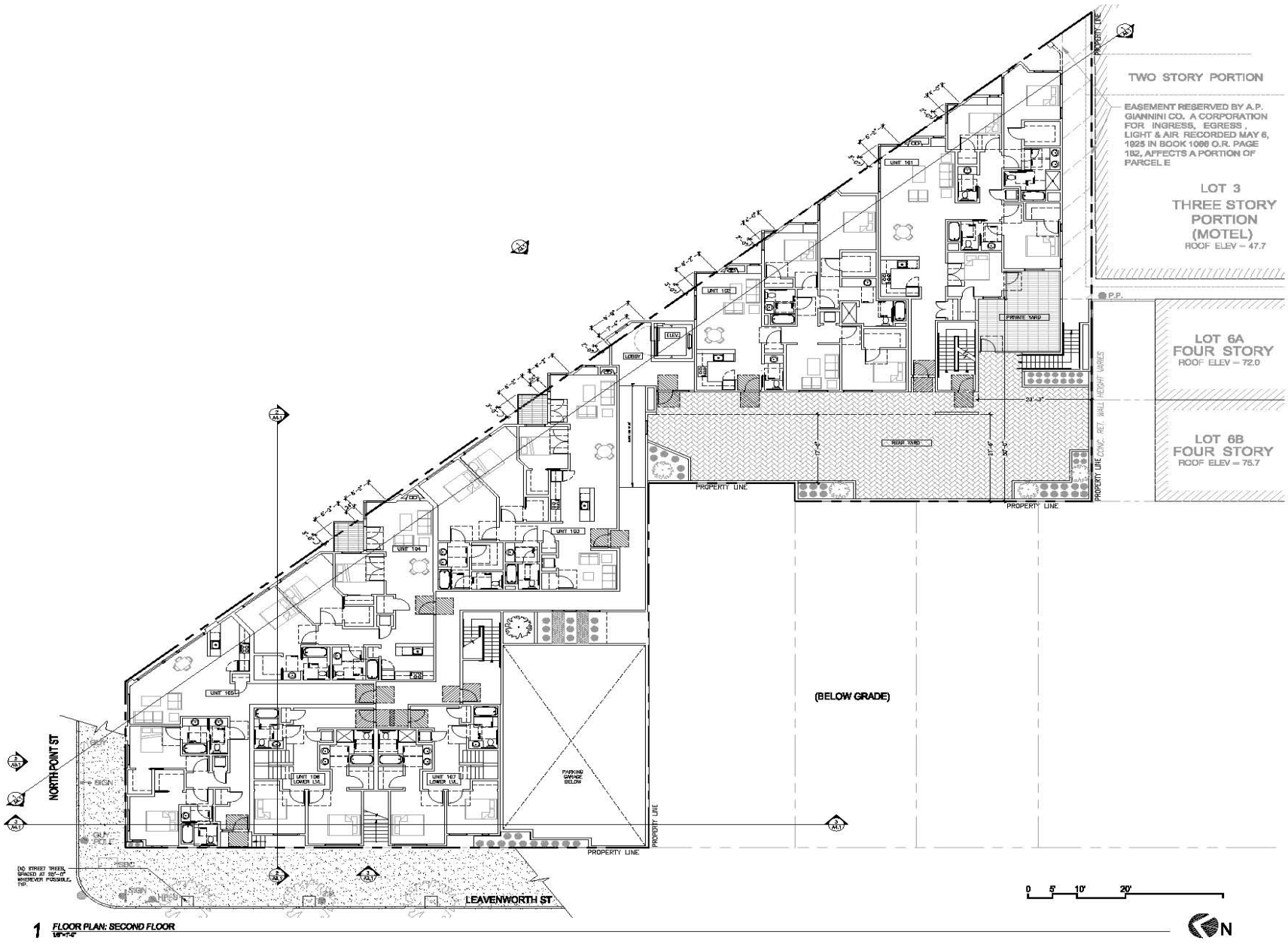


Figure 1 Project Site Location



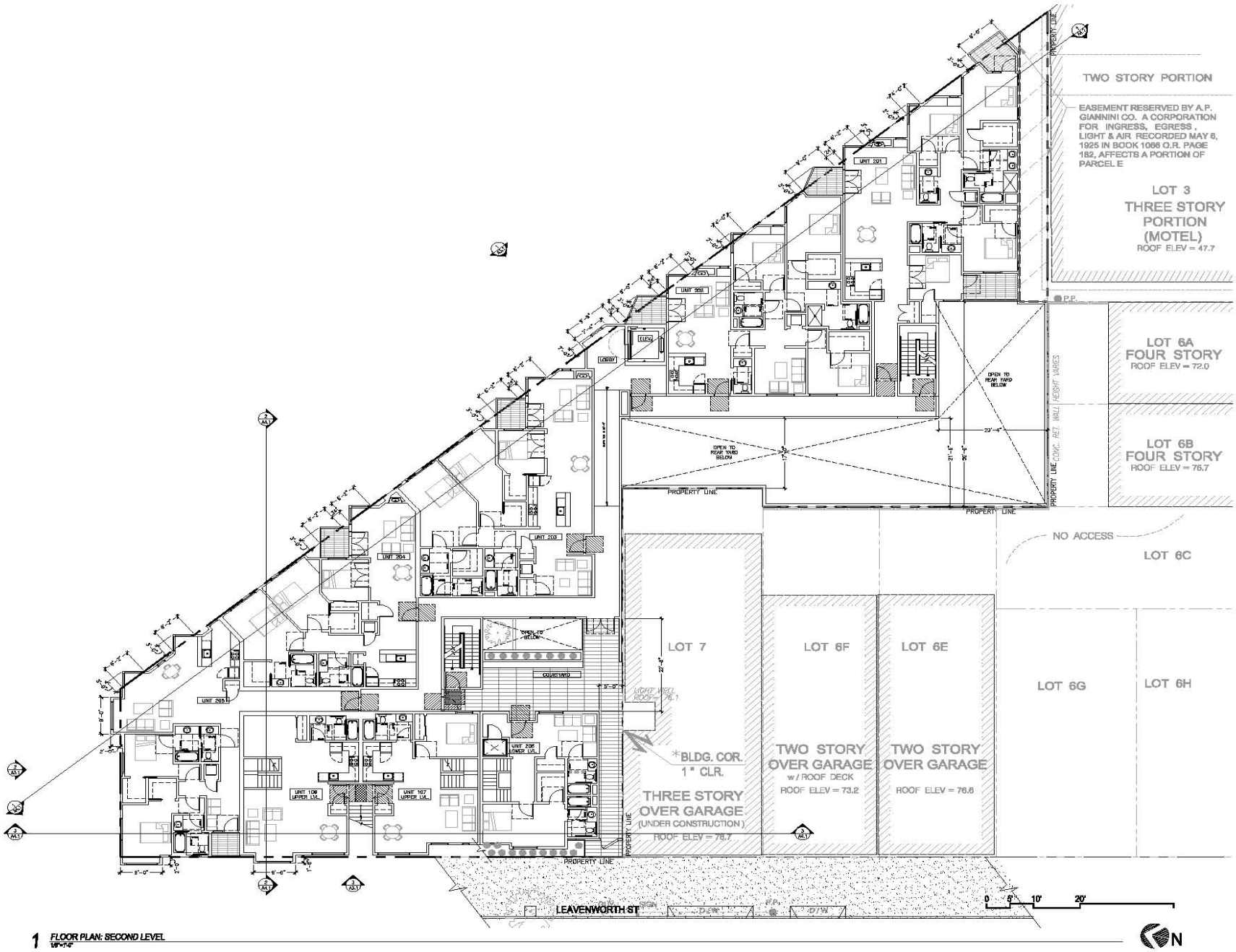
1 FLOOR PLAN: RETAIL / PARKING LEVEL
1/8"=1'-0"

FIGURE 2 **PROPOSED FIRST- FLOOR PLAN**



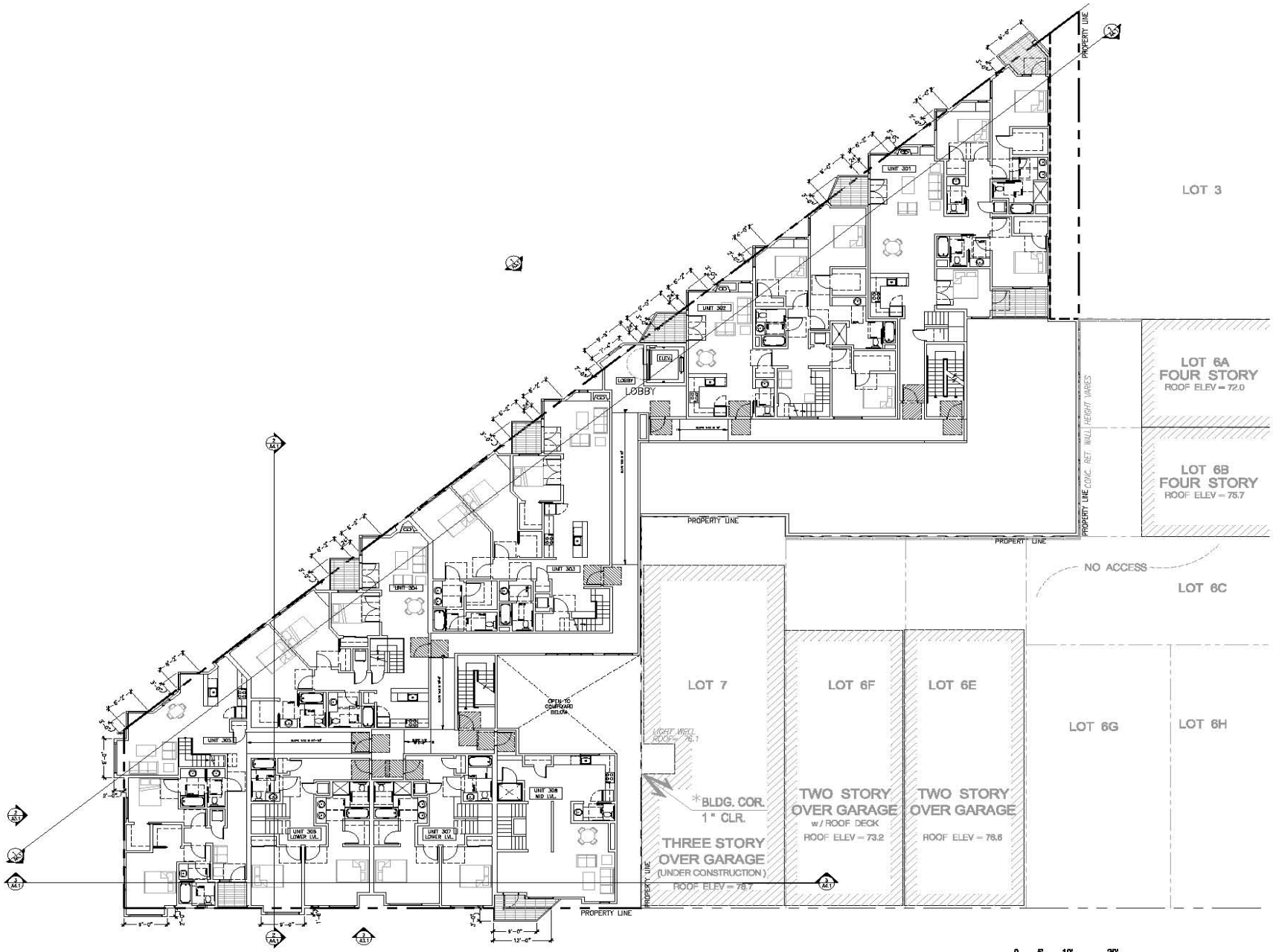
1 FLOOR PLAN: SECOND FLOOR
1/8"=1'-0"

FIGURE 3 **PROPOSED SECOND- FLOOR PLAN**



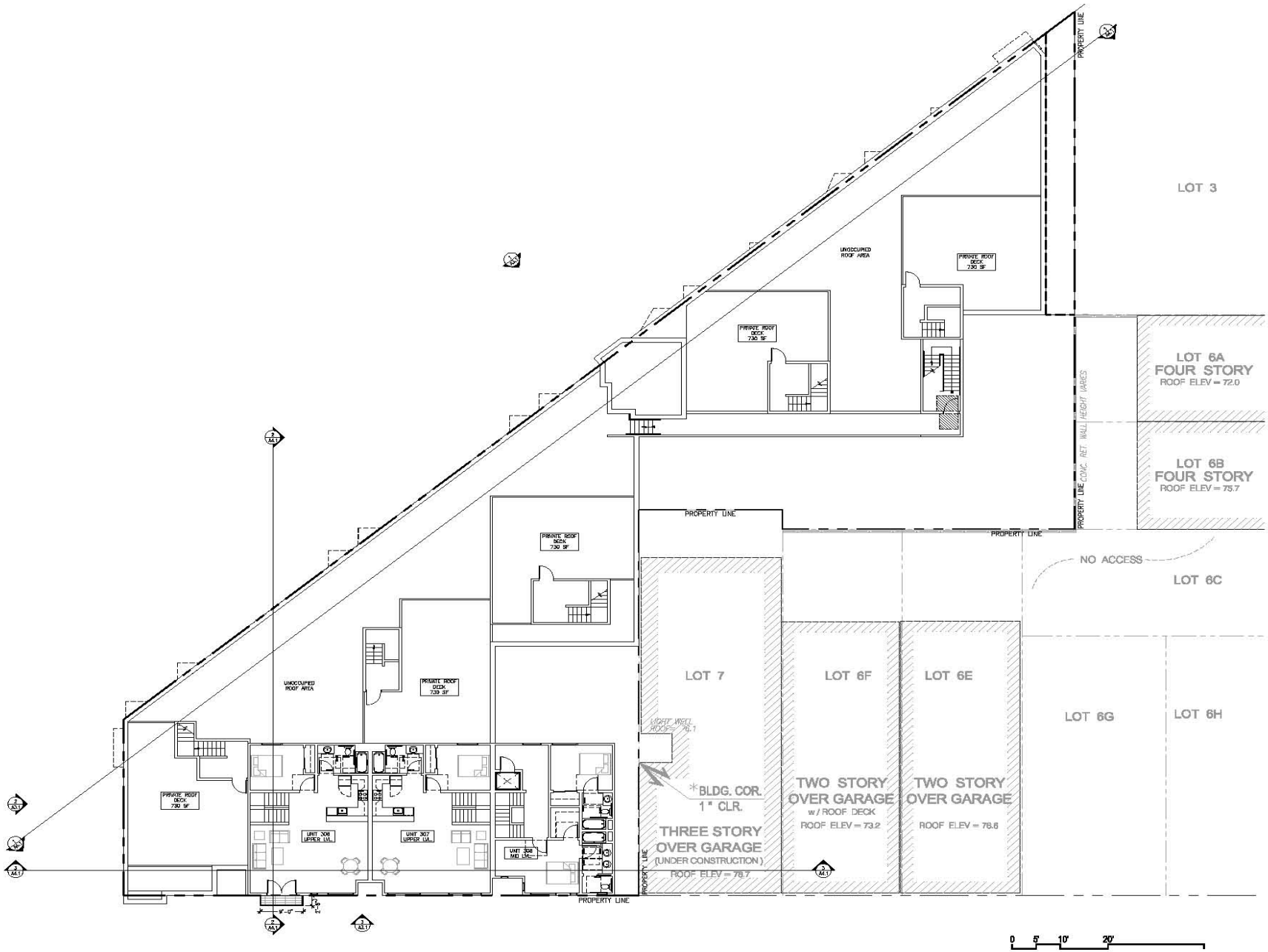
1 FLOOR PLAN: SECOND LEVEL
1/8"=1'-0"

FIGURE 4 **PROPOSED THIRD- FLOOR PLAN**



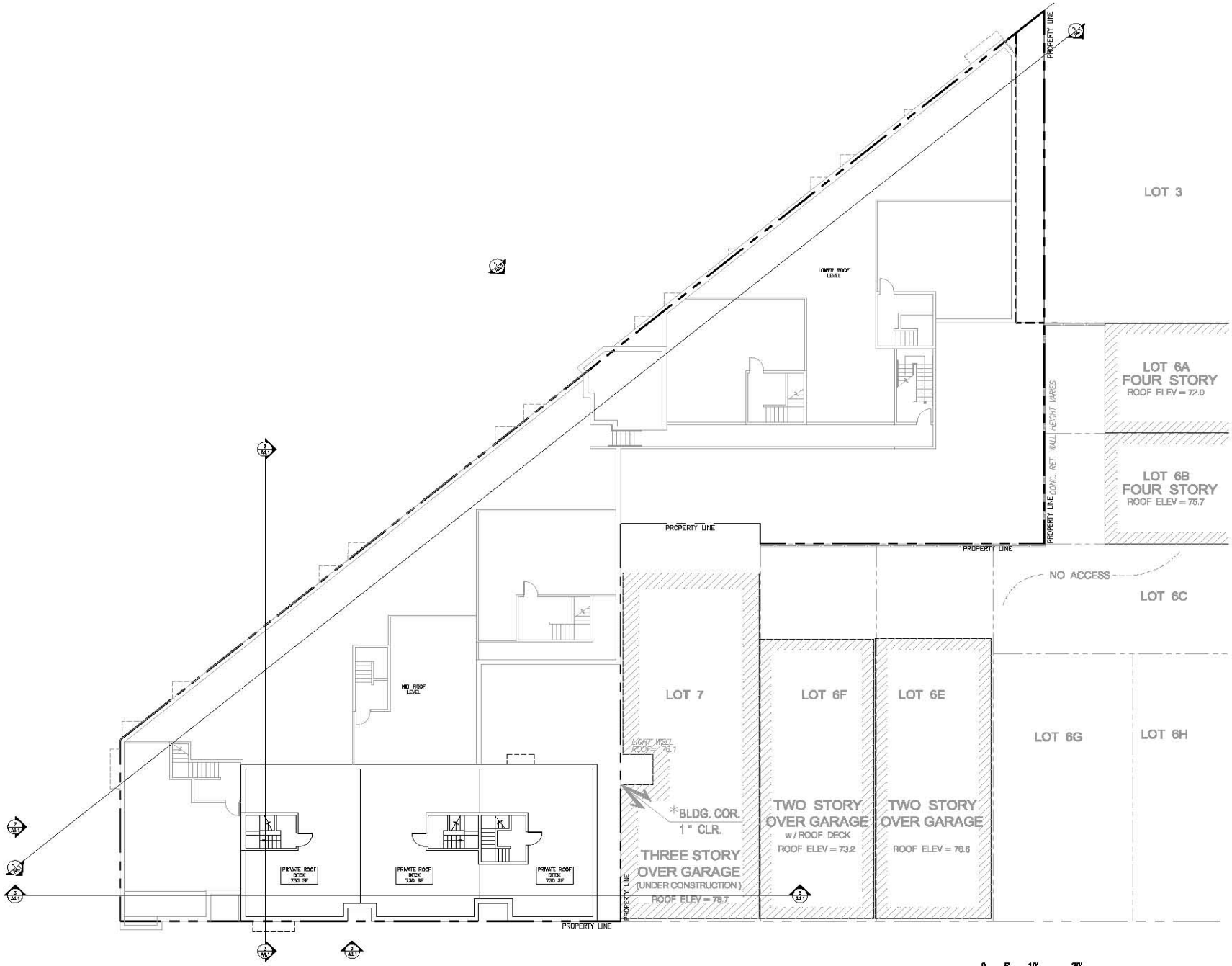
1 FLOOR PLAN: FOURTH FLOOR
1/8"=1'-0"

FIGURE 5 **PROPOSED FOURTH- FLOOR PLAN**



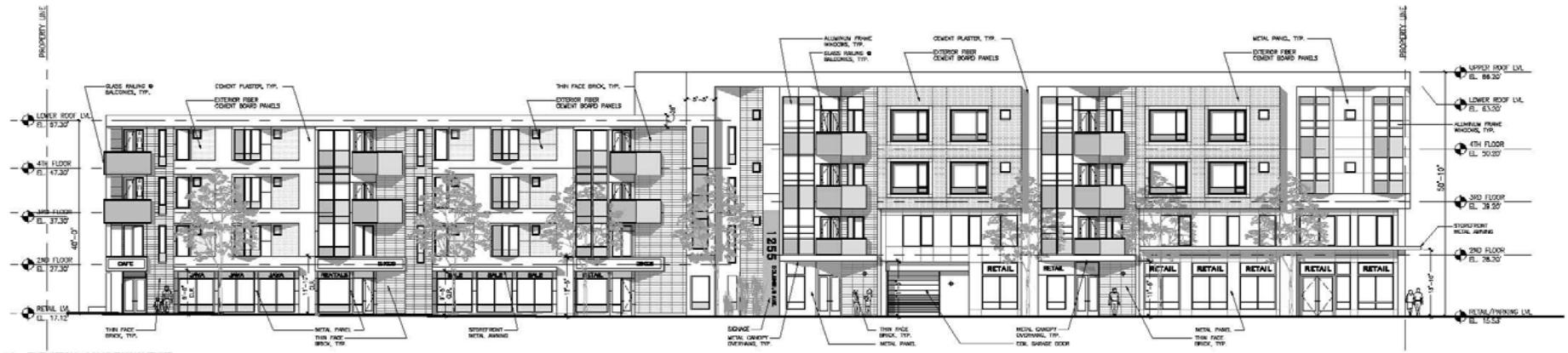
1 FLOOR PLAN: PENTHOUSE LEVEL
1/8"=1'-0"

FIGURE 6 **PROPOSED PENTHOUSE- FLOOR PLAN**



1 ROOF PLAN
1/8"=1'-0"

FIGURE 7 **PROPOSED ROOF PLAN**



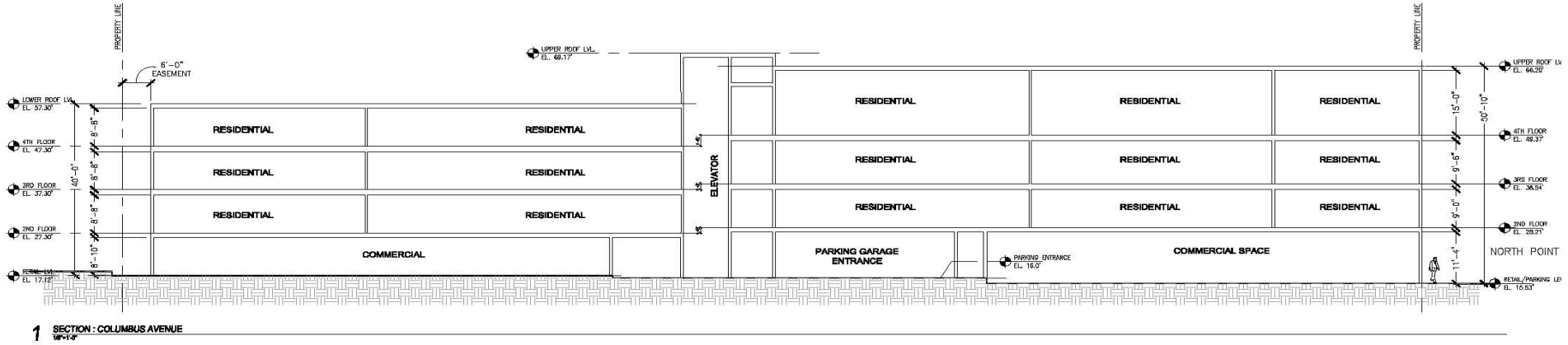
1 **ELEVATION : COLUMBUS AVENUE**

2 **ELEVATION : NORTH POINT STREET**

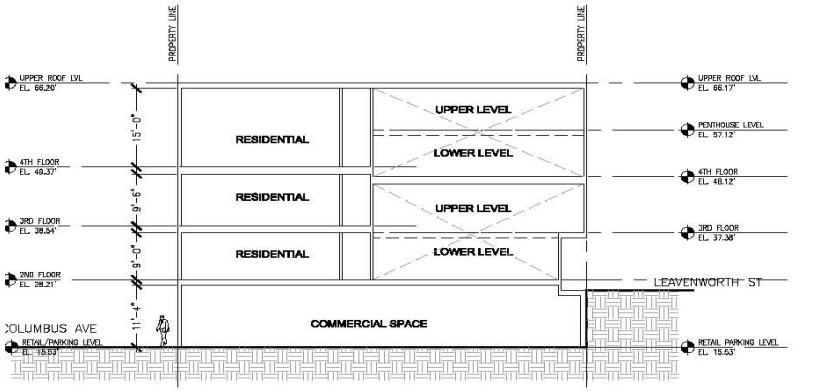
3 **ELEVATION : LEAVENWORTH STREET**

0 5' 10' 20'

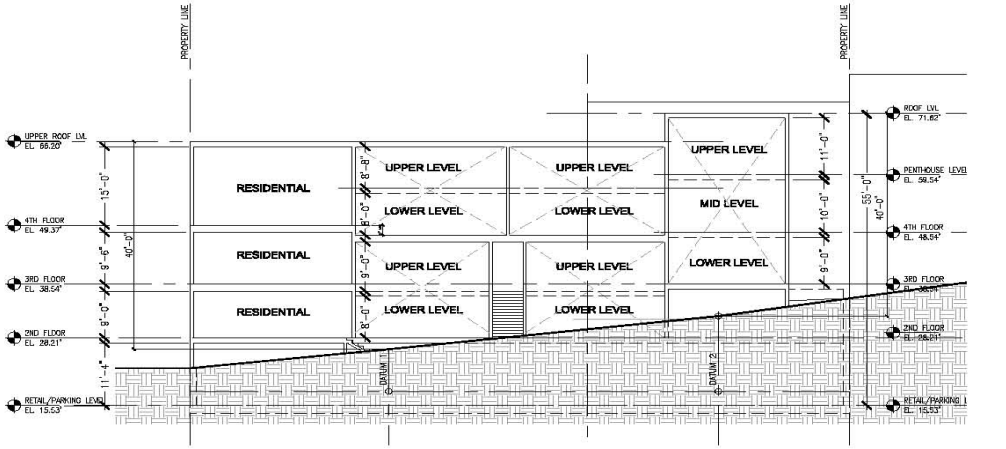
FIGURE 8 **PROPOSED EXTERIOR ELEVATIONS**



1 SECTION : COLUMBUS AVENUE
1/8"=1'-0"



2 SECTION : EAST / WEST
1/8"=1'-0"



3 SECTION : LEAVENWORTH STREET
1/8"=1'-0"

0 5' 10' 20'

FIGURE 9 **PROPOSED SECTIONS**

B. PROJECT SETTING

The 16,622-square-foot project site is in the Russian Hill neighborhood of San Francisco, bordering the North Beach neighborhood and Fisherman's Wharf, on a block bounded by North Point to the north, Leavenworth to the west, and Bay Street to the south. The project is located in a C-2 (Community Business District) Use District and a 40-X Height and Bulk District. The project site vicinity is a mixed-use area comprised primarily of tourist hotels, commercial, and residential uses.

The immediate vicinity of the project site is characterized by hotels, residential buildings, and mixed-use buildings ranging in height from 20 to 40 feet, and from two to four stories tall. The project site is situated directly adjacent to three hotel buildings: The Marriot Hotel, a four-story hotel building east of the project site on Columbus Avenue, which encompasses the entire north side of Columbus Avenue between North Point and Bay Street; The Bayside Inn at the Wharf, a three-story hotel building abutting the project site to the south on Columbus Avenue; and The Holiday Inn, a four-story hotel building north of the project site on the northeast corner of the intersection of North Point Street and Columbus Avenue. To the west of the project site are primarily two-to three-story residential buildings on Leavenworth and North Point Streets. Other nearby buildings within two blocks of the project site include commercial, mixed-use, and residential along Bay Street. Commercial uses along Bay Street such as large commercial establishments including Trader Joe's, Safeway, and Cost Plus World Market, approximately four blocks southeast of the project site. Two blocks to the north of the project site on Columbus Avenue is additional commercial and the Haslett Warehouse Building, which is San Francisco Landmark #59, and is located at the intersection of Beach Street and Columbus Avenue. Additionally, three blocks to the west of the project site on North Point Street is Ghirardelli Square, which is San Francisco City Landmark #30.

The project site is located directly south of North Point Street, and one-half block north of Bay Street. Columbus Avenue is a two-way, northwest-southeast roadway with two travel lane in each direction, and parking on both sides of the street. North of North Point Street, Columbus Avenue is a two-way, northwest-southeast roadway with one travel lane in each direction and parking on both sides of the street. North Point Street is a two-way, east-west roadway with and one travel lane in each direction and dedicated bicycle lanes on both sides of the street, with parking on both sides of the street. North Point Street is part of Bicycle Route #2 and Columbus Avenue is part of the Bicycle Route #11. Leavenworth Street is a two-way, north-south street, with one travel lane in each direction, with parking on both sides of the street. Bay Street is a two-way east-west roadway with two travel lane in each direction and parking on both sides of the street.

The project area is well-served by local and regional transit lines. Muni bus stations are directly in front of the project site along Columbus Avenue, and one block north along North Point Street. The Montgomery and the Embarcadero BART and Muni Metro light rail stations are located about one mile to the southeast.

C. COMPATIBILITY WITH ZONING, PLANS, AND POLICIES

	Applicable	*Not Applicable*
Discuss any variances, special authorizations, or changes proposed to the Planning Code or Zoning Map, if applicable.	☒	☐
Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.	☐	☒
Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection, or from Regional, State, or Federal Agencies.	☒	☐

SAN FRANCISCO PLANNING CODE

The *San Francisco Planning Code (Planning Code),* which incorporates the City's Zoning Maps, governs permitted uses, densities, and configuration of buildings within San Francisco. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless (1) the proposed project conforms to the *Planning Code*, (2) allowable exceptions are granted pursuant to provisions of the *Planning Code*, or (3) amendments to the *Planning Code* are included as part of the proposed project.

The project site is located within a Community Business (C-2) Use District and a 40-X Height and Bulk District. As described in Section 210.2 of the *Planning Code*, C-2 Districts are devoted to providing comparison shopping goods and services on a general or specialized basis to a Citywide or a regional market area, complementing the main area for such types of trade in downtown San Francisco. Additionally, C-2 Districts serve several functions. They provide convenience goods and services to residential areas of the City, both in outlying sections and in closer-in, more densely built communities. The extent of these districts varies from smaller clusters of stores to larger concentrated areas, including both shopping centers and strip developments along major thoroughfares. The character and intensity of commercial development are intended to be consistent with the character of other uses in the adjacent areas. The emphasis is upon compatible commercial uses, but a wider variety of goods and services is included to suit the longer-term needs of customers and greater latitude is given for the provision of automobile-oriented uses.

The C-2 District permits residential development with a density ratio not exceeding the number of dwelling units permitted in the nearest R District, provided that the maximum density ratio in a C-2 District shall in no

case be less than for an RM-1 District. The nearest R district to the project site is a Residential House District, Three-Family (RH-3), which would principally permit three dwelling units. The RM-1 District permits residential development of one dwelling unit for each 800 square feet of lot area. The project site has a square-footage 16,622; therefore, the permitted dwelling unit density for the project site would be 20 dwelling unit. The proposed project would provide 20 dwelling units and would not exceed the allowable density limit for the C-2 District.

The C-2 District in which the project site is situated generally extends east from Columbus Avenue to the The Embarcadero. South and west of the project site is a RH-3 District that flanks North Point Street and Bay Street. Two blocks to the east along Bay Street is a Residential, Mixed-Use, Medium Density (RM-3) district. The 40-X Height and Bulk District predominates throughout the project area.

The project site's C-2 zoning principally allows for residential use, and commercial uses. The proposed project would entail the construction of a mixed-use building with 20 dwelling units and 6,480 square-feet of commercial space. Thus, the proposed project would be consistent with the uses and residential density permitted by the Planning Code within the C-2 District.

The project site is also located within the Waterfront Special Use District No. 2. The principally permitted uses allowed within this special use district include industrial, commercial, and other operations directly related to the conduct of waterborne commerce or navigation except in residential districts. Additionally, the Waterfront Special Use District No. 2 requires that the following uses shall be permitted only upon approval by the Planning Commission as a conditional use under Section 303 of the Planning Code.

1. A hotel or motel, if otherwise listed in this Code as a permitted use; and
2. An automobile service station, if otherwise listed in this Code as a permitted use; and
3. Any building or use which provides a greater number of off-street parking spaces than required under Section 151 of the Planning Code; however, this subsection shall not apply in any case where fewer than 10 such spaces are provided.
4. Any use, whether principal or accessory, not screened from view from adjacent streets and other public areas, with the exception of accessory off-street parking areas for nine or fewer automobiles.

The proposed project would not require a conditional use under the Waterfront Special Use District No. 2 and the proposed residential and commercial uses are principally permitted uses.

Under Section 151 of the Planning Code, the parking requirement in the C-2 District is one off-street parking space for every residential unit. The proposed project would provide one space for each dwelling unit for a total of 20 off-street parking spaces and would be consistent with the residential parking requirements. Section 151 requires commercial uses to have one off-street parking space for each 500 square feet of occupied floor area where the occupied floor area exceeds 5,000 square feet. Therefore, the project would be required to provide 13 parking spaces for the commercial use. As none are being proposed as part of the project, the project sponsor will be requesting a variance for Section 151 of the Planning Code.

Under Section 155.5 of the Planning Code, the bicycle parking requirement for residential units is one Class 1 space for every two dwelling units up to 50 dwellings units. Therefore, the proposed project would be required to provide 10 bicycle parking spaces. The proposed project would provide 12 bicycle spaces and therefore would comply with the bicycle parking requirements. Under Section 155.4 of the Planning Code, the bicycle parking requirements for new commercial building, where the gross square footage exceeds 25,000 square feet but is no greater than 50,000 feet, three bicycle spaces are required. The proposed project would have 6,215 square feet of ground-floor commercial space, and would not be required to provide bicycle parking for the commercial use.

The proposed project would involve closing an existing 57-foot wide curb cut along the Columbus Avenue frontage of the property, and create a new 10-foot wide curb cut along Columbus Avenue. This curb cut would be utilized to access the off-street residential parking for the project. In order to preserve a pedestrian-oriented character and minimize delays in transit service, Planning Code Section 155(r)(2)(Q) prohibits vehicular access to off-street parking on Columbus Avenue between Washington and North Point Streets. The proposed curb cut does not comply with the specified provision; therefore, the project sponsor will be requesting a variance from Section 155 of the Planning Code.

The project would be required to provide a rear yard equal to 25% of the depth of the lot (no less than 15 feet) at each level containing a dwelling unit. The proposed proposes an alternative configuration of a courtyard situated within the interior of the lot, and therefore, the proposed project would require a variance for Section 134 of the Planning Code.

Section 415 of the Planning Code sets forth the requirements and procedures for the Affordable Housing Program. Under Section 415.3, these requirements would apply to projects that consist of five or more units, including the proposed project. Pursuant to Section 415, the proposed project would be required to provide

three affordable housing units on site. Only ownership units may be provided on-site to meet the requirements of Section 415. Alternatively, the requirements of the Residential Inclusionary Housing Requirement can be met by payment of an in-lieu fee to the Mayor's Office of Housing, as described in Planning Code Section 415.7, or construction of affordable units off-site at 20% of the total units. Prior to the required variance hearing, the project sponsor would submit a Declaration of Intent indicating the intended means of complying with the Affordable Housing Program. The required approvals and variances for the proposed project are listed on page 2.

PLANS AND POLICIES

San Francisco Plans and Policies

San Francisco General Plan

The San Francisco *General Plan* provides general policies and objectives to guide land use decisions. 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) that set forth goals, policies and objectives for the physical development of the City. 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. Any potential conflicts identified as part of the process would not alter the physical environmental effects of the project.

Proposition M—The Accountable Planning Initiative

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the City *Planning Code* to establish eight Priority Policies. These policies, and the sections of this Environmental Evaluation addressing the environmental issues associated with the policies, are: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character (Question 1c, Land Use); (3) preservation and enhancement of affordable housing (Question 3b, Population and Housing, with regard to housing supply and displacement issues); (4) discouragement of commuter automobiles (Questions 5a, b, f, and g, Transportation and Circulation); (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership (Question 1c, Land Use); (6) maximization of earthquake preparedness (Questions 13 a-d, Geology, Soils, and Seismicity); (7) landmark and historic building preservation (Question 4a, Cultural Resources); and

(8) protection of open space (Questions 8 a and b, Wind and Shadow, and Questions 9a and c, Recreation). Prior to issuing a permit for any project that requires an Initial Study under the California Environmental Quality Act (CEQA), and prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action that requires a finding of consistency with the *General Plan*, the City is required to find that the proposed project or legislation would be consistent with the Priority Policies. As noted above, the consistency of the proposed project with the environmental topics associated with the Priority Policies is discussed in the Evaluation of Environmental Effects, providing information for use in the approvals for the proposed project.

Regional Plans and Policies

The five principal regional planning agencies and their over-arching policy-plans to guide planning in the nine-county bay area include the Association for Bay Area Governments' (ABAG) "*A Land Use Policy Framework"* and *Projections 2005*, the Bay Area Air Quality Management District's (BAAQMD's) *Clean Air Plan* and *Bay Area 2005 Ozone Strategy*, the Metropolitan Transportation Commission's *Regional Transportation Plan – Transportation 2030*, the San Francisco Regional Water Quality Control Board's *San Francisco Basin Plan*, and the San Francisco Bay Conservation and Development Commission's *San Francisco Bay Plan*. Due to the size and nature of the proposed project, there would be no anticipated conflicts with regional plans.

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	☐ Air Quality	☒ Biological Resources
☐ Aesthetics	☐ Greenhouse Gas Emissions	☐ Geology and Soils
☐ Population and Housing	☐ Wind and Shadow	☐ Hydrology and Water Quality
☒ Cultural and Paleo. Resources	☐ Recreation	☒ Hazards/Hazardous Materials
☐ Transportation and Circulation	☐ Utilities and Service Systems	☐ Mineral/Energy Resources
☐ Noise	☐ Public Services	☐ Agricultural and Forest Resources
		☐ Mandatory Findings of Significance

This Initial Study examines the proposed project to identify potential effects on the environment. For each item on the Initial Study checklist, the evaluation has considered the impacts of the proposed project both individually and cumulatively. All items on the Initial Study Checklist that have been checked "Less than Significant Impact with Mitigation Incorporated," "Less than Significant Impact," "No Impact" or "Not Applicable," indicate that, upon evaluation, staff has determined that the proposed project could not have a

significant adverse environmental effect relating to that issue. A discussion is included for those issues checked "Less than Significant Impact with Mitigation Incorporated" and "Less than Significant Impact" and for most items checked with "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 Department, such as the Department's *Transportation Impact Analysis Guidelines for Environmental Review*, or the California Natural Diversity Data Base and maps, published by the California Department of Fish and Game. For each checklist item, the evaluation has considered the impacts of the project both individually and cumulatively. The items checked above have been determined to be "Less than Significant with Mitigation Incorporated."

E. EVALUATION OF ENVIRONMENTAL EFFECTS

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
1. LAND USE AND LAND USE PLANNING— Would the project:					
a) Physically divide an established community?	☐	☐	☒	☐	☐
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐	☐
c) Have a substantial impact upon the existing character of the vicinity?	☐	☐	☒	☐	☐

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

The proposed project would construct a four-story, 40' in height, mixed-use building with 20 residential units and 6,215 square-feet of commercial space, and would demolish an existing 15,852-square-foot, 32-feet in height office building. The proposed project would be constructed within the existing lot boundaries and would not interfere with or change the existing street plan nor impede the passage of persons or vehicles. Therefore, the proposed project would not physically divide an established community, and this impact would be less than significant.

Impact LU-2: The proposed project would be consistent with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. (Less than Significant)

The proposed project would not obviously conflict with applicable plans, policies, and regulations such that an adverse physical change would result (see Section C. Compatibility with Existing Zoning and Plans, p. 13-16). In addition, environmental plans and policies are those, like the Bay Area Air Quality Plan, that directly address environmental issues and/or contain targets or standards, must be met in order to preserve or improve characteristics of the City's physical environment. The proposed project would not obviously or substantially conflict with any such adopted environmental plan or policy. Therefore, the proposed project would have a less-than-significant with regard to conflicts with on existing plans and zoning.

Impact LU-3: The proposed project would not have a substantial impact upon the existing character of the vicinity. (Less than Significant)

The proposed project would not introduce new or incompatible land uses to the area. The project site is zoned C-2 , which principally allows for residential use and commercial uses. The area surrounding the project site along the east side of Columbus Avenue between North Point and Bay Street is entirely occupied by The Marriot Hotel, which is four stories in height. Directly abutting the project site to the south on Columbus Avenue is the Bayside Inn at the Wharf hotel, which is three stories in height. North of the project site, at the intersection of North Point Street and Columbus Avenue, is the Holiday Inn, which is a four-story hotel building. West of the project site along Leavenworth and North Point Streets are primarily two-to three-story residential buildings. The proposed project would be four stories and have a height of 40 feet, and would be similar to the other buildings and hotels on the project block, and the proposed project would be consistent with the varied size, structures and mixed land use character of the area. The proposed mixed-use building would be consistent with the surrounding area's character of two- to four-story mixed-use commercial, residential buildings, and hotel buildings, and would thus result in a less-than-significant impact on neighborhood character.

For the reasons discussed above, the proposed project's impacts related to land use, both individually and cumulatively, would be less than significant.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
2. AESTHETICS—Would the project:					
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment which contribute to a scenic public setting?	☐	☐	☒	☐	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties?	☐	☐	☒	☐	☐

Impact AE-1: The proposed project would not have a substantial adverse effect on a scenic vista. (Less than Significant)

There is no existing public scenic view or vista available from the project site or its vicinity; therefore, the proposed project would not block or degrade any existing public scenic views or vistas. The project may be visible from a limited number of windows west of the project site along Leavenworth Street because the topography is upsloping on Leavenworth Street from the project site. Additionally, the project site would be visible from a limited number of residences from Bay Street because of the upsloping topography from Columbus Avenue to Bay Street. Additionally, the project may be visible from a limited number of windows from the Bayside Inn at the Wharf. From these private residences and hotels, the proposed project would block limited portions of the sky or change the visual character of the existing skyline because the proposed project would be 40 feet tall and four-stories, and the existing office buildings is two to three stories in height, and 32 feet tall. This increase in height by eight feet and one-story would not be a significant increase in height. Additionally, the upsloping topography along the southern property line of the project site and the three streets that border the project site including Leavenworth, North Point Street, and Columbus Avenue provides a screen for most or all of the field of view that would be occupied by the proposed project. The proposed project would not change views currently observed from streets adjacent to the project site, such as north-west views on Columbus Avenue or east-west views on North Point Street, and it would not eliminate any scenic view or vista now observed from public areas. The project could potentially partially block or modify existing views from the adjacent residential buildings. Such changes would be an unavoidable consequence of the proposed project and could be considered undesirable for those affected individuals. While this loss or change of views might be of

concern to those affected, it would not affect a substantial number of people and would not be considered a significant impact pursuant to CEQA in the densely developed urban context of the Russian Hill neighborhood.

Given the dense urban setting of the proposed project and absence of damage to scenic resources, the proposed project's impact of scenic vistas would have no significant environmental impact.

Impact AE-2: The proposed project would not substantially damage any scenic resources. (Less than Significant)

Scenic resources are the visible physical features on a landscape (e.g. land, water, vegetation, animals, structures, or other features). Scenic resources of the built environment may include City landmarks that would be identified along a tour route, including, but not limited to, Coit Tower and the Golden Gate Bridge. The project site itself would not be considered a scenic resource, as its visual physical features are an existing office building and surface parking lot. The proposed project would result in the removal of approximately 12 significant trees and seven street trees. In accordance with San Francisco Public Works Code Article 16, these trees would be required to be replanted at a one-to-one ratio. Therefore, the proposed project is not expected to damage any scenic resources within the vicinity of the project site. Additionally, the removal of these 19 trees is discussed further under Topic 13, Biological Resources. Thus, the project would have less-than-significant impacts on scenic resources.

Impact AE-3: The proposed project would result in a change to the existing character of the project site, but this change would not degrade the visual character or quality of the site and its surroundings. (Less than Significant)

The proposed mixed-use building would be four stories and 40 feet tall. The project vicinity is occupied by two- to three-story buildings with residential uses along North Point, Leavenworth, and Bay Streets, hotels uses on Columbus Avenue and North Point Street, and commercial uses along Bay Street. The vicinity of the project site is characterized by a variety of building heights and massings, ranging from traditional to modern and from early twentieth century to contemporary styles. The proposed building would be the same height as the existing buildings that surround it, including the Marriot Hotel and the Holiday Inn, which are both directly across from the project site. The proposed mixed-use building would be visually compatible in terms of the types, heights, and massing of the buildings found in the immediate project vicinity. Thus, the effect of the proposed project on views from street-level vantage points would not be significant.

Design and aesthetics are, by definition, subjective and open to interpretation by decision-makers and members of the public. A proposed project would therefore be considered to have a significant adverse effect on visual quality under CEQA only if it would cause a substantial and demonstrable negative change. The proposed project would not cause such a change. The project would not change the visual character of the project site since the proposed project's height and massing would be similar to some of the existing buildings in the vicinity. While intensifying the use on the project site, the proposed project would not add a new or visually inconsistent presence to the area. For these reasons, the proposed project would not be expected to cause a substantial and demonstrable negative change or disruption to the existing visual character of the project vicinity.

Impact AE-4: The proposed project would create a new source of light and glare, but not to an extent that would adversely affect day or nighttime views in the area or which would substantially impact other people or properties. (Less than Significant)

The project would comply with Planning Commission Resolution 9212, which prohibits the use of mirrored or reflective glass at the pedestrian level. Mirrored glass would not be used in the new building. The project's lighting is consistent with exterior lighting typical of other buildings in the project vicinity. For these reasons, the proposed project would not generate obtrusive light or glare that would substantially impact other properties. Light and glare would not be considered a significant impact of the project.

For the reasons discussed above, the proposed project's impacts related to aesthetics, both individually and cumulatively, are not considered to be significant under CEQA.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
3. POPULATION AND HOUSING— Would the project:					
a) Induce substantial 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 housing units or create demand for additional housing, necessitating the construction of replacement housing?	☐	☐	☒	☐	☐

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐	☐

Currently, the project site is occupied by a 15,852 square-foot office building. The office building employs 57 people. There are no residents on the site. The proposed development of 20 dwelling units would result in an on-site population increase of approximately 39 residents. [1] The commercial component of the proposed project would employ approximately 18 people.[2] As noted, the existing office building employs 57 persons. The project would result in a net loss of 39 employees on site.

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

In general, a project would be considered growth inducing if its implementation would result in substantial population increases and/or new development that might not occur if the project were not implemented. The 2000 U.S. Census indicates that the population of the project's census tract, Census Tract 103, is approximately 4,092 persons. Based on year 2000 population totals, the proposed project would increase the population in Census Tract 103 by approximately one percent.[3] The project would increase the overall residential population of the City and County of San Francisco by approximately 0.1 percent.[4] The proposed project would not increase the net employment, therefore, the proposed project and would not generate a substantial demand for additional housing in the context of citywide employment growth.

While the project would increase population at the site, compared to existing conditions, project-specific impacts would not be significant relative to the number of area-wide residents and employees in the project vicinity. Overall, the increase in housing and employment would be less-than-significant in relation to the expected increases in the population and employment of San Francisco. The project would not directly or

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U.S Census Bureau Profile of Demographic Characteristics. 2000 Census Tract 103 has an average household population of 1.96 persons/household x 20 units = approximately 39 residents.

[2] Based on the standard multiplier of 350 gsf per general commercial employees, per San Francisco Planning Department Transportation Impact Analysis Guidelines for Environmental Review, October 2002. (6,480/350 = 18.5 = 18 employees).

[3] Census 2000 population in Census Tract 103 was 4,092 and the proposed project would increase population by about 57 residents. 57 residents/4,092 residents = 0.014 = 1.4 percent = approximately a one percent increase.

[4] The calculation is based on the estimated Census 2000 population of 776,733 persons in the City and County of San Francisco (and population generated by household size factor). (57 residents/776,733 residents = 0.00075 = .075 percent)

indirectly result in a significant increase in population. Project-related impacts with respect to population growth would be less than significant.

Impact PH-2: The proposed project would not displace substantial numbers of people or existing housing units or create demand for additional housing, necessitating the construction of replacement housing. (Less than Significant)

As noted above, the project site is currently used as an office building and includes no residents. Hence, there would be no residents displaced as a result of the project. The project would displace the 57 existing employees associated with the office building. The proposed ground-floor commercial use would employ approximately 18 employees on site. This would represent a net loss in employment of about 39 employees at the site. While this would be a change in on-site employment, it would be a less-than-significant impact with respect to displacement of population and housing. Overall, the proposed project would result in less-than-significant impacts related to displacement of people.

For the reasons discussed above, the proposed project's impacts related to population and housing, both individually and cumulatively, are considered less than significant.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
4. CULTURAL AND PALEONTOLOGICAL RESOURCES— Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource as defined in §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) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒	☐

Impact CP-1: The proposed project would demolish the existing building at 1255-1275 Columbus Avenue, which is not considered historically significant for the purposes of CEQA, and would have a less-than-significant impact on historic architectural resources. (Less than Significant)

The project site is currently an office building and surface parking lot. In a Historical Resource Evaluation Response (HRER) memorandum dated August 3, 2009, the Planning Department determined that the subject building located at 1255-1275 Columbus Avenue is not a historical resource as defined by CEQA.[5] The subject property is not included on any historic resource surveys and is not included on the California Register. The existing buildings' recorded date of construction (1954) makes it a "Category B" building for the purposes of CEQA review. Category B building are considered properties requiring further consultation and review to determine whether the property is an historical resources for the purposes of CEQA.

The existing 15,852-square-foot office building was constructed in 1954. The subject building's architectural style most closely resembles the International style. The subject building, with its vernacular design, contains few distinctive characteristics of the International style including: steel casement windows, reinforced concrete, and flexible open floor plan. For instance, the exteriors steel beams are presented as an ornament, which undermines the effectiveness continuous ribbon windows and smooth exterior walls. Additionally, the vernacular design of the building is solitary and does not represent a regional architecture trend. The building fails to embody sufficient distinctive characteristics of a type or period of architecture and the use of reinforced concrete is not a notable method of construction for the time period.

The subject building is a reinforced concrete structure that was designed by Anshen & Allen Architects and constructed by Joseph L. Eichler & Sons in 1954 for the Honig-Cooper Co., as an advertising agency. Since the original construction in 1954, four subsequent additions occurred between 1956 and 1966, which were each designed by Anshen & Allen, and the subsequent alterations were by various other contractors. Joseph Eichler was a Modernist residential real estate developer and builder, and Anshen & Allen was a firm that was active in postwar housing from 1940 through 1964. Both Eichler and Anshen & Allen Architects are considered masters within their field and as influential persons to architecture and development within the State of California. Eichler built more than 11,000 homes between 1949 and 1973 and created suburbs throughout California with his trademark modern homes – single-story, open floor plans, Asian influenced, post-and-beam construction, blank walls facing the street of vertical cedar siding, painted brick or concrete blocks, and walls of glass of glass

[5] Historic Resource Evaluation Response Memorandum for 1255-1275 Columbus Avenue from Angela Threadgill, Preservation Planner, to Chelsea Fordham, Major Environmental Analysis, August 3, 2009. A copy of this memorandum is available for public review at the Planning Department, 1650 Mission Street, 4th Floor, as part of Case File No. 2008.0723E.

on interior – facing facades, known as "California Modern." In 1961, Eichler in collaboration with Claude Oakland, former employee of Anshen & Allen, built his only other office complex at Stanford University's Jordon Quad in his signature residential style. 1255-1275 Columbus Avenue is a departure from his planned communities and is not representative of his modern residential enclaves.

Anshen and Allen Architects were formed in 1940 and were principally active in the field of residential housing during the postwar period. Anshen & Allen Architects were the first to design the Eichler prototype and collaborated with Eichler on many residential projects from 1947 to 1964. Additionally, the firm also contributed to San Francisco's Financial District redevelopment with two notable commercial towers, the International Building, 601 California Street (1962), and Bank of California Tower, 430 California (1967). How the collaboration of Anshen & Allen and Eichler occurred for the Honig-Cooper office (1255-1275 Columbus Ave.) building is unknown. Although Anshen & Allen Architects are recognized by architectural scholars to be a significant influence of regional Modernism, 1255-1275 Columbus Avenue is not representative of their work, which is a firm primarily known for their post-WWII residential architecture.

The subject parcel is located on the southwest corner of Columbus Avenue and North Point Street, within the Russian Hill neighborhood, bordering the North Beach neighborhood and Fisherman's Wharf. The neighborhood context of the subject property is a mix of single- and multi - family dwelling, commercial, hotels, commercial, and professional and business offices. The architectural context of the neighborhood consists of early 20th Century Revival style, Bay Area eclectism, Modernism, and Post-Modernism and the property is not located within the boundaries of any known historic district. Additionally, the project site is located two blocks north of Fisherman's Wharf, which contains several historic resources; however, the project site is located too far afield from these sites to result in an impact to off-site historic resources. The subject building is not considered a historical resource for the purpose of CEQA, either as an individual resource or as a contributor to a potential historic district or district boundary extension. Therefore, the proposed project would not have an adverse impact on historical resources as defined by CEQA and this impact would be less-than-significant.

Impact CP-2: The proposed project would result in damage to, or destruction of, as-yet unknown archeological remains, should such remains exist beneath the project site. (Less than Significant with Mitigation)

The proposed project would require excavation to a depth of about four feet below the existing ground surface on 95% of the project site, while the remaining 5% of the site, which is the southwest corner of the project site,

would require excavation to a depth of approximately 9.5 feet. Additionally, excavation of the site is estimated to require 15,000 cubic yards of soil removal. Due to the proposed excavation work, the Planning Department conducted a study to determine if any archeological resources would be impacted. In a memorandum dated January 14, 2011, the Planning Department staff determined that there appear to be no CEQA-significant archeological deposits present at the project site.[6] Additionally, in order to reduce the potential impacts of any accidental discovery of potentially significant archeological resources, the project sponsor would be required to comply with **Mitigation Measure M-CP-2**, which would reduce this impact to a less-than-significant impact.

Mitigation Measure M-CP-2

Archaeological Resources. (Accidental Discovery)

The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in CEQA Guidelines Section 15064.5(a)(c). The project sponsor shall distribute the Planning Department archeological resource "ALERT" sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, pile driving, etc. firms); or utilities firm involved in soils disturbing activities within the project site. Prior to any soils disturbing activities being undertaken each contractor is responsible for ensuring that the "ALERT" sheet is circulated to all field personnel including, machine operators, field crew, pile drivers, supervisory personnel, etc. The project sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) to the ERO confirming that all field personnel have received copies of the Alert Sheet.

Should any indication of an archeological resource be encountered during any soils disturbing activity of the project, the project Head Foreman and/or project sponsor shall immediately notify the ERO and shall immediately suspend any soils disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures should be undertaken.

If the ERO determines that an archeological resource may be present within the project site, the project sponsor shall retain the services of a qualified archeological consultant. The archeological consultant shall advise the ERO as to whether the discovery is an archeological resource, retains sufficient integrity, and is of potential scientific/historical/cultural significance. If an archeological resource is present, the archeological consultant shall identify and evaluate the archeological resource. The archeological consultant shall make a

[6] Memorandum from Randall Dean/Don Lewis, San Francisco Planning Department to Chelsea Fordham, San Francisco Planning Department, January 14, 2011. A copy o this memorandum is available for public review at the Planning Department, 1650 Mission Street, 4th Floor, as part of Case File No. 2008.0723E.

recommendation as to what action, if any, is warranted. Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by the project sponsor.

Measures might include: preservation in situ of the archeological resource; an archaeological monitoring program; or an archeological testing program. If an archeological monitoring program or archeological testing program is required, it shall be consistent with the Major Environmental Analysis (MEA) division guidelines for such programs. The ERO may also require that the project sponsor immediately implement a site security program if the archeological resource is at risk from vandalism, looting, or other damaging actions.

The project archeological consultant shall submit a Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describing the archeological and historical research methods employed in the archeological monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO, copies of the FARR 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 FARR to the NWIC. The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of 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. In instances of high public interest or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.

Impact CP-3: The proposed project would result in a less-than-significant impact to paleontological resources. (Less than Significant)

Paleontology is a multidisciplinary science that combines elements of geology, biology, chemistry, and physics in an effort to understand the history of life on earth. Paleontological resources, or fossils, are the remains, imprints, or traces of once-living organisms preserved in rocks and sediments. Paleontological resources include vertebrate, invertebrate, and plant fossils or the trace or imprint of such fossils. The fossil record is the only evidence that life on earth has existed for more than 3.6 billion years. Fossils are considered non-renewable resources because the organisms from which they derive no longer exist. Thus, once destroyed, a fossil can never be replaced. Paleontological resources are lithologically dependent; that is, deposition and preservation of

paleontological resources are related to the lithologic unit in which they occur. If the rock types representing a deposition environment conducive to deposition and preservation of fossils are not favorable, fossils will not be present. Lithological units which may be fossiliferous, include sedimentary and volcanic formations. The project site is generally underlain by fill and sandstone (Quaternary), and would result in minimal excavation, except for the southwest corner of the project site. Fill and sandstone are not expected to be fossiliferous since they are not lithological formations. Therefore the proposed project would not have impacts on paleontological resources or geological resources.

Impact CP-4: The proposed project would result in a less-than-significant impact to human remains. (No Impact)

Impacts on Native American burials are considered under Public Resources Code (PRC) Section 15064.5(d)(1). When an Initial Study identifies the existence of, or the probable likelihood of, Native American human remains within the project site, the CEQA lead agency is required to work with the appropriate tribal entity, as identified by the California Native American Heritage Commission (NAHC). The lead agency may develop an agreement with the appropriate tribal entity for testing or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials. By implementing such an agreement, the project becomes exempt from the general prohibition on disinterring, disturbing, or removing human remains from any location other than the dedicated cemetery (Health and Safety Code Section 7050.5) and the requirements of CEQA pertaining to Native American human remains. The project's treatment of human remains and of associated or unassociated funerary objects discovered during any soils-disturbing activity would comply with applicable state laws, including immediate notification of the City and County of San Francisco (CCSF) Coroner. If the Coroner were to determine that the remains are Native American, the NAHC would be notified and would appoint a Most Likely Descendant (PRC Section 5097.98). The archeological sensitivity analysis, discussed above, did not identify the project site as a site of potential Native American burials. As such the project is not anticipated to disturb any human remains, including Native American burials, and the project would have no impact on human remains.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
5. TRANSPORTATION AND CIRCULATION— Would the project:					
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐	☐
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels, obstructions to flight, or a change in location, that results in substantial safety risks?	☐	☐	☐	☒	☐
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	☐	☐	☒	☐	☐
e) Result in inadequate emergency access?	☐	☐	☒	☐	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities, or cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity or alternative travel modes?	☐	☐	☒	☐	☐

The project site is not located near a public or private airport or within an airport land use plan area. Therefore, significance criterion 5c would not apply to the proposed project.

Setting

The project site is located at the intersection of Columbus Avenue, North Point, and Leavenworth Streets, in the Russian Hill neighborhood of San Francisco. The project site is also located one-half block north of Bay Street, one block east of Jones Street, and one block south of Beach Street. Columbus Avenue is a two-way, northwest – southeast roadway with two travel lanes in each direction, and metered parking on both sides of the street.

North Point Street is a two-way, east-west roadway with and one travel lane in each direction and dedicated bicycle lanes on both sides of the street, and parking on both sides of the street. Leavenworth Street is a two-way, north - south street, with one travel lane in each direction, with parking on both sides of the street. Bay Street is a two-way, east-west roadway, with two travel lanes in each direction and parking on both sides of the street.

In the San Francisco *General Plan*, Columbus Avenue is designated as a Major Arterial in the Transportation Element, part of the Congestion Management Program (CMP) Network, a Transit Important Street, part of the Citywide Pedestrian Network, a Metropolitan Transportation System (MTS) Network Street, a Neighborhood Commercial Street, part of the Citywide bicycle route, and a Freight Traffic Route (Other Major Arterials).

In addition, the General Plan designates North Point Street as a Major Arterial in the Transportation Element, part of the Congestion Management Program (CMP) Network, as a Transit Important Street, a Metropolitan Transportation System (MTS) Network Street, a Neighborhood Commercial Street, part of the Citywide bicycle route, and a Freight Traffic Route (Other Major Arterials).

The intersections at Columbus Avenue and North Point Street are all signalized. Columbus Avenue has a left turn lane onto North Point Street.

Impact TR-1: The proposed project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation, nor would the proposed project conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures. (Less than Significant)

Policy 10.4 of the Transportation Element of the San Francisco General Plan states that the City will "Consider the transportation system performance measurements in all decisions for projects that affect the transportation system." To determine whether the proposed project would conflict with a transportation- or circulation-related plan, ordinance or policy, this section analyzes the proposed project's effects on intersection operations, transit demand, impacts on pedestrian and bicycle circulation, parking and freight loading, as well as construction impacts.

Project Travel Demand

The proposed project would construct an approximately 54,420 square-foot, 40-foot in height, mixed-use building with 20 residential units and 6,215 square-feet of ground-floor commercial. As set forth in the Planning Department's *Transportation Impacts Analysis Guidelines for Environmental Review* (October 2002) the Planning Department evaluates traffic conditions for the weekday PM peak hour conditions typically represent the worst conditions of the local transportation network.

The proposed project is estimated to generate 845 new average daily person-trips,[7] including 95 in the P.M. peak hour. These net new trips would be distributed among various modes of transportation including single occupancy vehicles, carpools, public transit, walking, and bicycling. Of the estimated net new 95 P.M. peak hour person trips, approximately 53 would be vehicular trips, 14 would be transit trips, 25 would be walking trips, and one would be trips by other means that include bicycling and motorcycles.[8] These vehicle trips generated by the proposed project would not be considered a substantial traffic increase relative to the existing capacity of the local street system. Additionally, the proposed project would place its garage entrance and 10-foot-wide curb cut approximately 55 feet from a bus shelter and stop for the Muni 30-Stockton line. Therefore, vehicles entering and exiting the proposed garage could result in potential conflicts with bus traffic and bus loading and unloading. However, the increase in vehicular trips from the proposed project would not substantially increase transit conflicts on the project site because the existing office building has as 55-foot curb cut that overlaps with the existing bus stops. Therefore, the proposed project would not substantially increase transit conflicts or affect transit operations from the existing conditions. Residents and businesses along Columbus Avenue, North Point, and Leavenworth Streets could experience an increase in vehicular activity as result of the proposed project; however, this increase would result in a less-than-significant impact relative to the existing capacity of the local street system.

Loading

No off-street loading spaces would be provided for the proposed project, and none are required in the *Planning Code* because the proposed commercial space is less than 10,000 square feet and the residential space would be less than 100,000 square feet. The proposed project would include 6,215 square feet of commercial space and 31,480 square feet of residential space. The number of delivery service vehicles generated by the proposed project would be approximately 0.11 truck trips per hour. Other deliveries would also include standard delivery

[7] The net new trips were calculated by subtracting the existing occupied office building daily person trips (287) from the proposed projects daily person trips (1,132).
[8] Residential trips were calculated at 10 trips per three - and two-bedroom units for the proposed projects' 20 dwelling units.

services like FedEx or UPS. Due to the proposed projects' uses, service-calls and deliveries would be relatively low and the effect on traffic flow would be considered less than significant.

Parking

Parking impacts are not considered significant under CEQA topic but a discussion of parking is presented here as an informational item. The San Francisco *Planning Code* Section 151 (Schedule for Required Off-Street Parking Spaces) requires one off-street parking space for every dwelling unit and for commercial space, one off-street parking space for each 500 square feet of occupied floor area up to 20,000 square feet, where the occupied floor area exceeds 5,000 square feet. Therefore, per the requirements of the *Planning Code*, the proposed project would be required to provide 20 off-street parking spaces for the residential units, and 12 off-street parking spaces for the commercial space, for a total of 32 off-street parking spaces. Additionally, the existing surface parking lot associated with the office building has 21 off-street parking spaces, and the proposed project would provide 20 spaces, resulting in a reduction of one off-street parking space. The proposed projects 20 off-street parking space would not meet the Planning Code requirements, and is therefore seeking a variance from Section 151 of the Planning Code.

The proposed project would generate a parking demand (which can differ from the Planning Code parking demand) of a total of approximately 69 parking spaces: 30 for residential use and 39 for commercial use. The parking demand of 69 spaces would exceed the supply of 20 residential spaces proposed by the project, resulting in a supply shortfall of 49 parking spaces.

It should be noted that San Francisco does not consider parking supply as part of the permanent physical environment. Parking conditions are not static, as parking supply and demand varies from day to day, from day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel.

Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. Environmental documents should, however, address the secondary physical impacts that could be triggered by a social impact (CEQA Guidelines Section 15131(a)). The social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, but there may be secondary physical environmental impacts, such as increased traffic congestion at intersections, air quality impacts, safety impacts, or noise impacts caused by congestion. In the experience of San Francisco transportation planners, however, the absence of a ready supply of parking spaces, combined with available

alternatives to auto travel (e.g., transit service, taxis, bicycles or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service in particular, would be in keeping with the City's "Transit First" policy. The City's Transit First Policy, established in the City's Charter Section 16.102 provides that "parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation." As described in detail above, the project site is well served by public transit.

The traffic analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking is unavailable. Moreover, the secondary effects of drivers searching for parking is typically offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area. Hence, any secondary environmental impacts which may result from a shortfall in parking in the vicinity of the proposed project would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise and pedestrian safety analyses, reasonably addresses potential secondary effects. In view of the above discussion, the proposed project's parking effect would not rise to a level considered significant.

Construction Activities

The proposed project would be constructed over a period anticipated to last approximately 16 months. Construction activities would include daily vehicle trips generated by the arrival and departure of construction workers. Approximately 15 workers would commute to the construction site each day for approximately 16 months for demolition and construction of the proposed project. Construction workers would park in the existing off-street parking lots in the area. Trucks would haul excavated materials away from the site and haul assembly materials to the site. Columbus Avenue and North Point Street would be used to access the site to haul building materials. Construction of the proposed project would not require any lane closures.

Throughout the construction period, there would be a flow of construction-related trucks into and out of the site. The impact of construction truck traffic would be a temporary lessening of the capacities of local streets due to the slower movement and larger turning radii of trucks, which may affect both traffic and transit operations. Construction workers who drive to the site could cause a temporary parking demand, and the project applicant would make accommodations for construction worker parking. Therefore, it is anticipated that construction workers would be accommodated without substantially affecting area wide parking conditions. The impacts of

construction on parking and traffic would be limited in scope and temporary in duration, and would not be significant. However, implementation of Improvement Measure IM–TR-1 would further decrease the less-than-significant construction period impacts.

Improvement Measure IM-TR-1: Construction Traffic Measures

The following measures would minimize disruption of the general traffic flow on adjacent streets:

- To the extent possible, truck movements should be limited to the hours between 9:00 AM and 3:30 PM (or other times, if approved by the SFMTA).
- The project sponsor and construction contractor(s) should meet with the Traffic Engineering Division of the SFMTA, the Police Department, the Fire Department, Muni's Street Operations and Special Events Office, the Planning Department, and other City agencies to determine feasible traffic measures to reduce traffic congestion and other potential transit disruption and pedestrian circulation effects during construction of the project.

Impact TR-2: The proposed project would not result in substantially increased hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. (Less than Significant)

The proposed project does not include any design features that would substantially increase traffic hazards (e.g., creating a new sharp curve or dangerous intersections), and would not include any incompatible uses, as discussed above in Topic 1, Land Use and Land Use Planning; therefore, there would no impacts associated with traffic hazards for the proposed project. The proposed project would include closing an existing 57-foot curb cut along Columbus Avenue to create a new 10-foot wide curb cut. This curb cut would be utilized to access the off-street residential parking for the project. A new curb cut accessing the project's proposed garage would be the project's only transportation-related design feature, and would not be out of character or present a substantial increased hazard. An additional discussion of the proposed garage and site residents' vehicles conflicting with the MUNI bus stop is presented on p. 36 within this section of the Initial Study.

Impact TR-3: The proposed project would not result inadequate emergency access. (Less than Significant)

The proposed project would not result in a significant impact with regard to emergency access, as the project site is accessible from major streets, including Columbus Avenue and North Point Street. The proposed project would not interfere with existing traffic circulation or cause major traffic hazards, nor have a significant effect on traffic-related hazards or emergency access provisions. Proposed buildings are required to meet the standards contained in the Building and Fire Codes, and the San Francisco Building and Fire Departments

would review the final building plans to ensure sufficient access and safety. The proposed project would therefore have a less-than-significant impact to emergency access conditions in the vicinity of the project site.

Impact TR-4: The proposed project would not conflict with adopted policies, plans or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such features. (Less than Significant)

Transit and Alternative Modes of Transportation

Muni provides transit service within the City and County of San Francisco, including bus (both diesel and electric trolley), light rail (Muni Metro), cable care, and electric streetcar lines. The project site is well served by public transit, with Muni providing service in the immediate vicinity. Muni lines passing within two blocks of the project site include the 30 - Stockton, 47 -Van Ness, the F-Market & Wharves, and the Powell – Hyde Cable Car line. The nearest BART station (Montgomery) is approximately one mile south of the project site on Market Street. The estimated 14 peak hour transit trips would be distributed among the Muni public transit lines providing service to the vicinity of the project site. This increase in transit demand associated with the project would not have a noticeable impact upon transit services in the area or affect acceptable transit operations. In view of the above, project impacts on public transit would be less than significant.

The proposed project would place its garage entrance and 10-foot-wide curb cut approximately 55 feet from a bus shelter and stop for the Muni 30-Stockton line. Therefore, vehicles entering and exiting the proposed garage could result in potential conflicts with bus traffic and bus loading and unloading. However, the existing curb cut for the 21 off-street parking spaces for the office building is currently 55 feet and is located directly overlapping with a portion of the bus stop. Therefore, the proposed project would not increase potential conflicts between cars with the Muni stop.

Pedestrian conditions in the vicinity of the project, on both sidewalks and crosswalks, were observed to be operating at acceptable levels of service. The proposed project would generate approximately 25 pedestrian trips, which would not be expected to substantially change the existing pedestrian conditions. Sidewalk widths are sufficient to allow for the free flow of pedestrian traffic. Pedestrian activity would increase as a result of the project, but not to a degree that could not be accommodated on local sidewalks or would result in safety concerns.

In the vicinity of the project site, Columbus Avenue and North Point Street are designated Citywide Bicycle Routes. North Point Street is part of Bicycle Route #2 and Columbus Avenue is part of the Bicycle Route #11.

Additionally, as part of the San Francisco Bicycle Plan, North Point Street has recently removed one travel lane going west and added dedicated bicycle lanes on both sides of the street going east and west. These routes are interconnected to the Citywide Bicycle Network and provide access to and from the project site from locations throughout the City. During a field survey, the number of bicyclists observed to be riding in the vicinity of the project site was relatively low. Any increase in traffic generated by the project would not be substantial enough to affect bicycle travel in the area, and project impacts on bicycles would be less than significant.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
6. NOISE—Would the project:					
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐	☐
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐	☐
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐	☐
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐	☐
e) For a project located within 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?	☐	☐	☐	☐	☒
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☐	☒
g) Be substantially affected by existing 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, topics 6e and 6f are not applicable.

Impact NO-1: The proposed project would not result in a substantial permanent increase in ambient noise levels in the project vicinity, nor would not expose persons to noise levels in excess of standards established in the local general plan or noise ordinance. (Less than Significant)

Sensitive receptors are people requiring quiet, for sleep or concentration, such as residences, schools, or hospitals, and people themselves who may be relatively more susceptible to adverse health impacts from their environment, such as immune-compromised individuals, populations with elevated levels of chronic illness, children, and the aged. The nearest sensitive receptors to the project site would be nearby residents and hotels, including residents of the buildings immediately west of the project site along Leavenworth and Bay Streets, and the three hotels immediately north, east, and south of the project site.

The Environmental Protection Element of the *General Plan* contains Land Use Compatibility Guidelines for Community Noise. These guidelines, which are similar to, but differ somewhat from, state guidelines promulgated by the Governor's Office of Planning and Research, indicate maximum acceptable exterior noise levels for various newly developed land uses. For residential uses, the maximum "satisfactory" exterior noise level without incorporating noise insulation into a project is 60 dBA[9] (Ldn)[10], while the guidelines indicate that residential development should be discouraged at exterior noise levels above 65 dBA (Ldn). Where exterior noise levels exceed 65 dBA, a detailed analysis of noise reduction requirements would be necessary prior to final review and approval, and new construction or development of residential uses will require that noise insulation features be included in the design. In addition, Title 24 of the California Code of Regulations establishes uniform noise insulation standards for residential projects. Title 24 requires that for interior noise levels with windows closed, exterior noise sources shall not exceed 45 dB in any habitable room (Title 24 requirements for residential structures other than detached single-family dwellings).

Ambient noise levels in the project vicinity are typical of noise levels in greater San Francisco, which are dominated by vehicular traffic, including trucks, cars, Muni buses, and emergency vehicles. Columbus Avenue and North Point Street are moderately to heavily trafficked, and generate moderate to high levels of traffic noise. Observation indicates that surrounding land uses do not noticeably conduct noisy operations. Based on modeling of traffic noise volumes conducted by the San Francisco Department of Public Health (DPH),[11] some near-road portions of the project site have ambient conditions in excess of 70 dBA. Therefore, the proposed

[9] The dBA, or A weighted decibel, refers to a scale of noise measurement that approximates the range of sensitivity of the human ear to sounds of different frequencies. On this scale, the normal range of human hearing extends from about 0 dBA to about 140 dBA. A 10-dBA increase in the level of a continuous noise represents a perceived doubling of loudness.

[10] The Ldn is a measure of community noise levels. Ldn is an A weighted sound level measured over a 24-month 24-hour time period.

[11] Traffic noise map presented on DPH website: http://www.sfdph.org/dph/EH/Noise/default.asp.

project would locate new residential units, considered to be sensitive receptors, in an environment with noise levels above those considered normally acceptable for residential uses, and the project sponsor would be required by the Department of Building Inspection and Title 24 to incorporate noise insulation features in the project to maintain an interior noise level of 45 dBA. It is anticipated that, at a minimum, sound-rated windows and/or doors would be installed as part of the proposed project. The DBI would review project plans for compliance with Title 24 noise standards. Compliance with Title 24 standards and with the *General Plan* would ensure that effects from exposure to ambient noise would not result in significant impacts, either individually or cumulatively.

Operation of the proposed project may include mechanical equipment, such as forced air mechanical ventilation, which could increase ambient noise levels. These operations would be subject to the San Francisco Noise Ordinance (Article 29, Section 2909 of the San Francisco Police Code), which limits noise from building operations. Substantial increases in the ambient noise level due to building equipment noise would not be anticipated. At the project location, operational noise would not be expected to be noticeable, given background noise levels along Columbus Avenue and North Point Street.

Vehicular traffic makes the greatest contribution to ambient noise levels throughout most of San Francisco. Generally, traffic must double in volume to produce a noticeable increase in the ambient noise level in the project vicinity. The proposed project would generate approximately 516 daily net new vehicle trips, and 53 PM peak-hour vehicle trips. This increase in vehicle trips would not cause traffic volumes to double on area streets, and it would not have a noticeable effect on ambient noise levels in the project vicinity, nor would the project contribute to any potential cumulative traffic noise effects.

In summary, the operational noise from the proposed project, including traffic-related noise, would not significantly increase the ambient noise levels in the project vicinity.

Impact NO-2: The proposed project would not result in a substantial temporary or periodic increase in ambient noise levels and vibration in the project vicinity above levels existing without the project. (Less than Significant)

Demolition**,** excavation and project construction would temporarily and intermittently increase noise and possibly vibration levels around the project site and may be considered an annoyance by occupants of nearby properties. Noise and vibration levels over the estimated 16-month construction period would fluctuate depending on the construction phase, equipment type and duration of use, distance between noise source and listener, and presence or absence of barriers. Construction noises associated with the proposed project would

include demolition, excavation, truck traffic, foundation construction, steel erection, and finishing. Of these, demolition, excavation, site work, and erection of the new building's exterior would likely generate the most construction-related noise.

Throughout the construction period there would be truck traffic to and from the site, hauling away excavated materials and debris, or delivering building materials. It is anticipated that construction hours would occur from 7 AM to 5 PM during the week, with possible limited work during weekends.

The San Francisco Noise Ordinance (Article 29 of the Police Code) regulates construction-related noise and would serve to avoid significant noise impacts on sensitive receptors during construction of the proposed project. The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA at a distance of 100 feet from the source. Impact tools, such as jackhammers, must have both the intake and exhaust muffled to the satisfaction of the Director of the Department of Public Works or the Director of Building Inspection. Section 2908 of the Ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m., if noise would exceed the ambient noise level by five dBA at the project property line, unless a special permit is authorized by the Director of Public Works or the Director of Building Inspection. The project must comply with regulations set forth in the Noise Ordinance.

Construction activities other than pile driving typically generate noise levels no greater than 90 dBA (for instance, for excavation) at 50 feet from the activity, while other activities, such as concrete work, are much less noisy. Closed windows typically can reduce daytime interior noise levels to an acceptable level. Therefore, for nearby sensitive receptors, although construction noise could be annoying at times, it would not be expected to exceed noise levels commonly experienced in an urban environment, and would not be considered significant. The project sponsors anticipate using a stiffened mat slab foundation. Construction of the proposed building would not require pile driving. The proposed project would not create unusual levels of ground borne vibration that would disturb nearby residents or businesses, and vibration impacts would be less than significant. Given the above-mentioned City noise regulations and the temporary nature of construction work, construction noise would have a less-than-significant effect on the environment. Additionally, Improvement Measure IM-TR-1, page 34, proposed to minimize the disruption of traffic flow by limiting truck movement to the hours between 9:00 AM and 3:30 PM, would also have the secondary effect of reducing the construction noise impacts.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
7. AIR QUALITY					
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐	☐

The Bay Area Air Quality Management District (BAAQMD) is the regional agency with jurisdiction over the nine-county Bay Area Air Basin. BAAQMD is responsible for attaining and maintaining air quality in the Air Basin within federal and State air quality standards. Specifically, BAAQMD 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 BAAQMD has also adopted *CEQA Air Quality Guidelines* (Air Quality Guidelines) to assist lead agencies in evaluating the air quality impacts of projects and plans proposed in the Air Basin. The Air Quality Guidelines provide procedures for evaluating potential air quality impacts during the environmental review process consistent with CEQA requirements. The BAAQMD recently issued revised Air Quality Guidelines that supersede the 1999 Air Quality Guidelines.[12]

According to the BAAQMD, the recently adopted thresholds of significance for criteria air pollutants, greenhouse gas (GHG) emissions, and health risks from new sources of emissions are intended to apply to environmental analyses that have begun on or after adoption of the revised CEQA thresholds of significance (June 2, 2010). The environmental review for the proposed project began on June 2, 2009 when a neighborhood notice was sent to community organizations, tenants of the affected property and properties adjacent to the project site, and those persons who own property within 300 feet of the project site. Thresholds of significance

[12] Bay Area Air Quality Management District (BAAQMD), *California Environmental Quality Act Air Quality Guidelines*, June 2010, http://www.baaqmd.gov/

pertaining to the health risk impacts of sources upon new sensitive receptors are intended to apply to environmental analyses begun on or after May 1, 2011. Therefore, according to the BAAQMD's policy, the proposed project would be subject to the thresholds identified in the BAAQMD 1999 Air Quality Guidelines. The 2010 thresholds of significance have generally been lowered and are more health protective than the 1999 Guidelines. Therefore, the following analysis is based upon the BAAQMD's recently adopted CEQA thresholds of significance (2010).

Impact AQ-1: Construction of the proposed project would not generate a substantial amount of fugitive dust emissions. (Less than Significant)

Project-related excavation and grading and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. Although there are federal standards for air pollutants and implementation of state and regional air quality control plans, air pollutants continue to have impacts on human health throughout the country. California has found that particulate matter exposure can cause health effects at lower levels than national standards. The current health burden of particulate matter demands that, where possible, public agencies take feasible available actions to reduce sources of particulate matter exposure. According to the California Air Resources Board (CARB), reducing ambient particulate matter from 1998–2000 levels to natural background concentrations in San Francisco would prevent over 200 premature deaths.

Dust can be an irritant causing watering eyes or irritation to the lungs, nose, and throat. Excavation, grading, and other construction activities can cause wind-blown dust to add to particulate matter in the local atmosphere. Depending on exposure, adverse health effects can occur due to this particulate matter in general and also due to specific contaminants such as lead or asbestos that may be constituents of soil.

For fugitive dust emissions, the 2010 Air Quality Guidelines recommend following the current best management practices, which has been a pragmatic and effective approach to the control of fugitive dust emissions. The Air Quality Guidelines note that individual measures have been shown to reduce fugitive dust by anywhere from 30 percent to more than 90 percent and conclude that projects that implement BAAQMD's recommended construction best management practices will reduce fugitive dust emissions to a less-than-significant level.[13]

The San Francisco Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes generally referred hereto as 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

[13] *Ibid*, Section 4.2.1.

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 (DBI).

The 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 DBI. The Director of DBI may waive this requirement for activities on sites less than one half-acre that are unlikely to result in any visible wind-blown dust.

The following regulations and procedures set forth in Article 22B of the San Francisco Health Code – Construction Dust Control Requirements – contain the BAAQMD-recommended best management practices:

- Water all active construction areas at least twice daily;
- Cover all trucks hauling soil, sand, and other loose materials, or require such trucks to maintain at least 2 feet of freeboard;
- Pave, apply water at a minimum three times daily in dry weather, or apply non-toxic soil stabilizers to all unpaved access roads, parking areas, and staging areas;
- Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas;
- Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public street areas;
- Hydroseed or apply non-toxic soil stabilizers to inactive construction areas (previously graded areas inactive for ten days or more);
- Enclose, cover, water twice daily or apply (non-toxic) soil binders to exposed stockpiles (dirt, sand, etc.);
- Limit traffic speeds on unpaved roads to 15 miles per hour;
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways;
- Replant vegetation in disturbed areas as quickly as possible;
- Install wheel washers for all exiting trucks, or wash off the tires of all trucks and equipment prior to leaving the site;
- Install wind breaks, or plant trees/vegetative wind breaks at windward side(s) of construction areas;
- Suspend excavation and grading activity when winds (instantaneous gusts) exceed 25 mph; and
- Limit the area subject to excavation, grading, and other construction activity at any one time.

The Dust Control Ordinance incorporated BAAQMD's recommended best management practices. Therefore, compliance with the Dust Control Ordinance would ensure that the project's fugitive dust impacts be less than significant.

Impact AQ-2: Construction of the proposed project would not violate an air quality standard or contribute to an existing or projected air quality violation. (Less than Significant)

The BAAQMD's 2010 CEQA thresholds of significance for criteria air pollutant emissions resulting from construction or operation of a proposed project is whether the project would emit reactive organic gases (ROG), oxides of nitrogen (NO_x), or fine particulate matter (PM_{10}) in excess of 54 lbs./day or whether the project would emit particulate matter (PM_{10}) in excess of 82 lbs./day.[14]

The 2010 Air Quality Guidelines state that the first step in determining the significance of criteria air pollutants and ozone precursors related to construction or operation of a proposed project is to compare the attributes of the proposed project with the applicable screening criteria provided in the Air Quality Guidelines.[15] The purpose of this comparison is to provide a conservative indication of whether construction or operation of the proposed project would result in the generation of criteria air pollutants or ozone precursors that exceed BAAQMD's thresholds of significance. If all of the screening criteria are met by a proposed project, then the lead agency or applicant does not need to perform a detailed air quality assessment of the project's air pollutant emissions, and construction or operation of the proposed project would result in a less-than-significant criteria air pollutant impact. If the proposed project does not meet all the screening criteria, then project emissions need to be quantified and compared against the thresholds of significance.[16]

The Air Quality Guidelines note that the screening levels are generally representative of new development on greenfield[17] sites without any form of mitigation measures taken into consideration. In addition, the screening criteria do not account for project design features, attributes, or local development requirements that could also result in lower emissions. For projects that are mixed-use, infill, and/or proximate to transit service and local services, emissions would be less than the greenfield-type project that the screening criteria are based upon.

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[14] The thresholds for criteria air pollutants have generally been lowered with the exception of PM_{10}. The threshold for PM_{10} has been increased from 80 lbs./day to 82 lbs./day. The difference between the 1999 and 2010 thresholds would not change the conclusions of this analysis.

[15] Bay Area Air Quality Management District (BAAQMD), *California Environmental Quality Act Air Quality Guidelines*, June 2010, at page 3-2 to 3-3.

[16] *Ibid*, p. 3-1.

[17] Agricultural or forest land or undeveloped site earmarked for commercial, residential, or industrial projects.

Vehicle exhaust resulting from on- and off-road construction equipment may emit criteria air pollutants. Based on a review of the Air Quality Guidelines' screening tables, for detailed analysis of criteria air pollutants and ozone precursors for a low-rise apartment building is 451 dwelling units. For retail projects, the screening level is 99,000 sf.[18] The proposed project includes 20 dwelling units and 6,215 sf of retail and thus is well below the screening level that requires a detailed air quality assessment of criteria air pollutant emissions. Thus, the project would not exceed any of the thresholds of significance for criteria air pollutants and would result in a less-than-significant air quality impact related to construction exhaust emissions.

Impact AQ-3: Operation of the proposed project would not violate an air quality standard or contribute to an existing or projected air quality violation. (Less than Significant)

A screening level analysis for project operations, similar to that described above for construction activities, was conducted to determine whether operation of the proposed project could exceed the BAAQMD's 2010 thresholds of significance. Projects that exceed the screening level sizes require a detailed air quality analysis. Projects below the screening levels would not be anticipated to exceed BAAQMD's 2010 significance thresholds for ROG, NO_x, PM_{10} and $PM_{2.5}$.

The Air Quality Guidelines' screening level for operational criteria air pollutant and ozone precursors for a low-rise apartment building is 451 dwelling units. For retail projects, the screening level is 99,000 sf.[19] The proposed project includes 20 dwelling units and 6,215 sf of retail and thus is well below the screening level that requires a detailed air quality assessment of criteria air pollutant emissions. Therefore, the project would not result in the generation of criteria air pollutants and ozone precursors that exceed the BAAQMD's thresholds of significance and operational criteria air pollutants and ozone precursors would be less than significant.

Impact AQ-4: Construction and operation of the proposed project would not result in a cumulatively considerable net increase in criteria air pollutants or otherwise conflict with regional air quality plans. (Less than Significant)

With respect to cumulative criteria air pollutant impacts, BAAQMD's approach to cumulative air quality analysis is that any proposed project that would exceed the criteria air pollutant thresholds of significance would also be considered to result in a cumulatively considerable increase in criteria air pollutants. As discussed in Impact AQ-2 and AQ-3, the proposed project would result in less-than-significant impacts related to construction and operational air quality emissions. Therefore, the proposed project's contribution to cumulative criteria air pollutant impacts is less than significant.

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[18] *Ibid*, Table 3-1.

[19] *Ibid*, Table 3-1.

The proposed project would be generally consistent with the General Plan and air quality management plans such as the 2010 Clean Air Plan, which is the applicable regional air quality plan developed for attainment of state air quality standards. Additionally, the General Plan, Planning Code, and the City Charter implement various transportation control measures identified in the City's Transit First Program, bicycle parking regulations, transit development fees, and other actions. Accordingly, the proposed project would not interfere with implementation of the 2010 Clean Air Plan, and this impact would be less than significant

Impact AQ-5: Implementation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations. (Less than Significant)

The San Francisco Department of Public Health (DPH) has issued guidance for the identification and assessment of potential air quality hazards and methods for assessing the associated health risks.[20] Consistent with the CARB guidance, DPH has identified that a potential public health hazard for sensitive land uses exists when such uses are located within a 150-meter (approximately 500-foot) radius of any boundary of a project site that experiences 100,000 vehicles per day. To this end, San Francisco added Article 38 of the San Francisco Health Code, approved November 25, 2008, which requires that, for new residential projects of 10 or more units located in proximity to high-traffic roadways, as mapped by DPH, an Air Quality Assessment be prepared to determine whether residents would be exposed to potentially unhealthful levels of $PM_{2.5}$. Through air quality modeling, an assessment is conducted to determine if the annual average concentration of $PM_{2.5}$ from the roadway sources would exceed a concentration of 0.2 micrograms per cubic meter (annual average).[21] If this standard is exceeded, the project sponsor must design the project to reduce $PM_{2.5}$ exposure to the residential units. Reduced exposure to $PM_{2.5}$ may be accomplished through the location of air intakes or by installation of a filtered air supply system, with high-efficiency filters, designed to remove at least 80 percent of ambient $PM_{2.5}$ from habitable areas of residential units.

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[20] 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 6, 2008. http://www.sfphes.org/publications/Mitigating_Roadway_AQLU_Conflicts.pdf, accessed June 21, 2010.

[21] According to DPH, this threshold, or action level, of 0.2 micrograms per cubic meter represents about 8–10 percent of the range of ambient PM2.5 concentrations in San Francisco based on monitoring data, and is based on epidemiological research that indicates that such a concentration can result in an approximately 0.28 percent increase in non-injury mortality, or an increased mortality at a rate of approximately 20 "excess deaths" per year per one million population in San Francisco. "Excess deaths" (also referred to as premature mortality) refer to deaths that occur sooner than otherwise expected, absent the specific condition under evaluation; in this case, exposure to PM2.5. (San Francisco Department of Public Health, Occupational and Environmental Health Section, Program on Health, Equity, and Sustainability, "Assessment and Mitigation of Air Pollutant Health Effects from Intra-urban Roadways: Guidance for Land Use Planning and Environmental Review, May 6, 2008. Twenty excess deaths per million based on San Francisco's non-injury, non-homicide, non-suicide mortality rate of approximately 714 per 100,000. Although San Francisco's population is less than one million, the presentation of excess deaths is commonly given as a rate per million population.)

The project site, at 1255-1275 Columbus Ave., is located within the Potential Roadway Exposure Zone, as mapped by DPH. In consultation with DPH, an Air Quality Assessment was prepared. Results of the assessment indicate that the $PM_{2.5}$ concentration at the project site does not exceed 0.2 micrograms per cubic meter.[22] Thus, the proposed project is not required to include air quality design considerations or install air filtration systems.

The 2010 Air Quality Guidelines also recommend an analysis of health risk impacts, which are effects related to the placement of a new sensitive receptor (for example, a residential project) in proximity to source(s) of toxic air contaminates (TACs) and particulate matter. The BAAQMD's thresholds of significance for health risk impacts are an increase in lifetime cancer risk of 10 chances in one million, an increase in the non-cancer, chronic or acute, hazard index greater than 1.0, and an increase in the annual average concentration of $PM_{2.5}$ in excess of 0.3 micrograms per cubic meter. If a single roadway or stationary sources exceeds any one of these thresholds, the project would be consider to expose sensitive receptors to a significant health risk impact. The BAAQMD also recommends cumulative thresholds of an increased cancer risk of 100 in one million, acute or chronic hazard index greater than 10.0, and a $PM_{2.5}$ concentration greater than 0.8 micrograms per cubic meter. If the total of all roadway and point sources within 1,000 feet of the proposed project exceed these cumulative thresholds, the project would be considered to exposure sensitive receptors to a significant cumulative health risk impact.

Sources of TACs include both mobile and stationary sources. To determine whether the proposed project would be below BAAQMD thresholds for TAC exposure, roadway and stationary sources in proximity to the project site were identified and quantified using the BAAQMD's screening-level methodology.[23]

Stationary Sources. BAAQMD data sources identified three permitted stationary sources of air pollutants within 1,000 feet (zone of influence) of the project site. As presented in Table 1, none of the permitted sources exceeded the BAAQMD screening threshold for individual cancer, non-cancer or $PM_{2.5}$ significance thresholds.[24] Therefore, no further analysis of the stationary sources is required.

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[22] Memorandum from Jennifer McLaughlin, M.S., San Francisco Department of Public Health, to Bruce Baumann, Bruce D. Baumann & Associates, February 23, 2009. A copy of this memorandum is available for public review by appointment at the Planning Department, 1650 Mission Street, 4th Floor, as part of Case File No. 2008.0723E.

[23] BAAQMD, *Recommended Methods for Screening and Modeling Local Risks and Hazards*, May 2010. Methodology for roadway analysis is described in Section 3.1.2, and roadway-screening tables are provided in Chapter 7. Updated screening tables for San Francisco were provided by the BAAQMD in October 2010.

[24] BAAQMD, Permitted Stationary Sources with 1,000 feet of 12755-1275 Columbus Avenue. A copy of this is available for public review at the Planning Department, 1650 Mission Street, 4th Floor, as part of Case File No. 2008.0723E.

Roadway Sources. The BAAQMD considers roadways with average daily vehicle traffic greater than 10,000 to result in potential health risks. Table 1 identifies two roadways within 1,000 feet of the project site with daily traffic over 10,000 vehicles per day.[25] None of the roadways exceed the BAAQMD's individual health risk significance thresholds (cancer risk of 10 chances in one million, and an increase in the annual average concentration of $PM_{2.5}$ in excess of 0.3 micrograms per cubic meter). No roadways in San Francisco are anticipated to exceed the non-cancer hazard index thresholds individually or cumulatively, and therefore non-cancer health risks from roadways were not quantified.

Conclusion. No individual sources would exceed the BAAQMD's significance thresholds for cancer risks, non-cancer risks and the annual average concentration of $PM_{2.5}$. Based on these results, the proposed project would not result in exposure of sensitive receptors to substantial pollutant concentrations. The cumulative risk from all stationary and mobile sources would be below the BAAQMD cumulative thresholds of significance (excess cancer risk of 100 in one million, chronic and acute Hazard Index of 10, or a $PM_{2.5}$ increase of 0.8 micrograms per cubic meter). Thus, cumulative and project level impacts involving exposure of sensitive receptors to substantial pollutant concentrations would be less than significant.

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

The project would not result in a perceptible increase or change in noxious odors on the project site or in the vicinity of the project, as it would not include uses prone to generation of noxious odors. Observation indicates that surrounding land uses are not sources of noticeable odors, and therefore, would not adversely affect project site residents.

[25] Vehicle rate data obtained from the California Environmental Health Tracking Program website, http://www.ehib.org/traffic_tool.jsp, accessed November 17, 2010. A copy of this is available for public review at the Planning Department, 1650 Mission Street, 4th Floor, as part of Case File No. 2008.0723E.

Table 1
Stationary and Roadway Toxic Air Contaminant Sources

Stationary Sources within 1,000 feet

Name	Type	Address	Cancer Risk	Chronic Hazard	Acute Hazard	$PM_{2.5}$
San Francisco Maritime NHP	No data	2905 Hyde Street Pier	0.00000000	0.00000000	0.00000000	0.00000000
Argonaut Hotel	Emergency Generator	495 Jefferson Street	2.22000000	0.00079100	0.00000000	0.00396000
Kenny Ma #254074	Gas dispensing facility	495 Jefferson Street	1.06318947	0.00076732	0.00024512	0.00000000
		Total Point Sources	3.28318947	0.00155832	0.00024512	0.00396000

Roadways greater than 10,0000 vehicles within 1,000 feet

Street	Volume	Distance in feet	Cancer Risk	$PM_{2.5}$
Columbus Avenue	22062	425	2.2097	0.12
Bay Street	30534	276	0.34	0.16
		Total Roadway	2.5497	0.28

Cumulative Health Risk Impact

	Cancer Risk	Chronic Hazard	Acute Hazard	$PM_{2.5}$
Total Point Sources	3.28318947	0.00155832	0.00024512	0.00396000
Total Roadway Sources	2.5497	N/A	N/A	0.28
Cumulative Impact	5.83288947	0.00155832	0.00024512	0.28396000

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
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 of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐	☐

ENVIRONMENTAL SETTING

Gases that trap heat in the atmosphere are referred to as greenhouse gases (GHGs) because they capture heat radiated from the sun as it is reflected back into the atmosphere, much like a greenhouse does. The

accumulation of GHG's has been implicated as the driving force for global climate change. The primary GHGs are carbon dioxide, methane, nitrous oxide, ozone, and water vapor.

While the presence of the primary GHGs in the atmosphere are naturally occurring, carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O) are largely emitted from human activities, accelerating the rate at which these compounds occur within earth's atmosphere. Emissions of carbon dioxide are largely by-products of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices and landfills. Other GHGs include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes. Greenhouse gases are typically reported in "carbon dioxide-equivalent" measures (CO_2E).[26]

The most common GHGs resulting from human activity are CO_2, CH_4, and N_2O.[27] State law defines GHGs to also include hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride. These latter GHG compounds are usually emitted in industrial processes, and therefore not applicable to the proposed project. 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 landfill operations.

There is international scientific consensus that human-caused increases in GHGs have and will continue to contribute to global warming. Potential global warming impacts in California may include, but are not limited to, loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years. Secondary effects are likely to include a global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity.[28]

The Air Resources Board (ARB) estimated that in 2006 California produced about 484 million gross metric tons of CO_2E ($MMTCO_2E$), or about 535 million U.S. tons.[29] The ARB found that transportation is the source of

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[26] Because of the differential heat absorption potential of various GHGs, GHG emissions are frequently measured in "carbon dioxide-equivalents," which present a weighted average based on each gas's heat absorption (or "global warming") potential.

[27] Governor's Office of Planning and Research. *Technical Advisory- CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*. June 19, 2008. Available at the Office of Planning and Research's website at: http://www.opr.ca.gov/ceqa/pdfs/june08-ceqa.pdf. Accessed March 3, 2010.

[28] California Climate Change Portal. Frequently Asked Questions About Global Climate Change. Available online at: http://www.climatechange.ca.gov/publications/faqs.html. Accessed November 8, 2010.

[29] California Air Resources Board (ARB), "California Greenhouse Gas Inventory for 2000-2006— by Category as Defined in the Scoping Plan." http://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scopingplan_2009-03-13.pdf. Accessed March 2, 2010.

38 percent of the State's GHG emissions, followed by electricity generation (both in-state and out-of-state) at 22 percent and industrial sources at 20 percent. Commercial and residential fuel use (primarily for heating) accounted for 9 percent of GHG emissions.[30] In the Bay Area, fossil fuel consumption in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) and the industrial and commercial sectors are the two largest sources of GHG emissions, each accounting for approximately 36% of the Bay Area's 95.8 $MMTCO_2E$ emitted in 2007.[31] Electricity generation accounts for approximately 16% of the Bay Area's GHG emissions followed by residential fuel usage at 7%, off-road equipment at 3% and agriculture at 1%.[32]

REGULATORY SETTING

In 2006, the California legislature passed Assembly Bill 32 (California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), also known as the Global Warming Solutions Act. AB 32 requires ARB to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25 percent reduction in emissions).

Pursuant to AB 32, ARB adopted a Scoping Plan in December 2008, outlining measures to meet the 2020 GHG reduction limits. In order to meet these goals, California must reduce its GHG emissions by 30 percent below projected 2020 business as usual emissions levels, or about 15 percent from today's levels.[33] The Scoping Plan estimates a reduction of 174 million metric tons of CO_2E ($MMTCO_2E$) (about 191 million U.S. tons) from the transportation, energy, agriculture, forestry, and high global warming potential sectors (see Table 2, below). ARB has identified an implementation timeline for the GHG reduction strategies in the Scoping Plan.[34] Some measures may require new legislation to implement, some will require subsidies, some have already been developed, and some will require additional effort to evaluate and quantify. Additionally, some emissions reductions strategies may require their own environmental review under CEQA or the National Environmental Policy Act (NEPA).

AB 32 also anticipates that local government actions will result in reduced GHG emissions. ARB has identified a GHG reduction target of 15 percent from current levels for local governments themselves and notes that

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[30] Ibid.
[31] Bay Area Air Quality Management District, Source Inventory of Bay Area Greenhouse Gas Emissions: Base Year 2007, Updated: February 2010. Available online at: http://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/Emission%20Inventory/regionalinventory2007_2_10.ashx. Accessed March 2, 2010.
[32] Ibid.
[33] California Air Resources Board, California's Climate Plan: Fact Sheet. Available online at: http://www.arb.ca.gov/cc/facts/scoping_plan_fs.pdf. Accessed March 4, 2010.
[34] California Air Resources Board. AB 32 Scoping Plan. Available Online at: http://www.arb.ca.gov/cc/scopingplan/sp_measures_implementation_timeline.pdf. Accessed March 2, 2010.

successful implementation of the plan relies on local governments' land use planning and urban growth decisions because local governments have primary authority to plan, zone, approve, and permit land development to accommodate population growth and the changing needs of their jurisdictions.

Table 2. GHG Reductions from the AB 32 Scoping Plan Sectors[35]

GHG Reduction Measures By Sector	GHG Reductions (MMT CO_2E)
Transportation Sector	62.3
Electricity and Natural Gas	49.7
Industry	1.4
Landfill Methane Control Measure (Discrete Early Action)	1
Forestry	5
High Global Warming Potential GHGs	20.2
Additional Reductions Needed to Achieve the GHG Cap	34.4
Total	**174**
Other Recommended Measures	
Government Operations	1-2
Agriculture- Methane Capture at Large Dairies	1
Methane Capture at Large Dairies	1
Additional GHG Reduction Measures	
Water	4.8
Green Buildings	26
High Recycling/ Zero Waste • Commercial Recycling • Composting • Anaerobic Digestion • Extended Producer Responsibility • Environmentally Preferable Purchasing	9
Total	**42.8-43.8**

The Scoping Plan relies on the requirements of Senate Bill 375 (SB 375) to implement the carbon emission reductions anticipated from land use decisions. SB 375 was enacted to align local land use and transportation planning to further achieve the State's GHG reduction goals. SB 375 requires regional transportation plans, developed by Metropolitan Planning Organizations (MPOs), to incorporate a "sustainable communities strategy" in their regional transportation plans (RTPs) that would achieve GHG emission reduction targets set by ARB. SB 375 also includes provisions for streamlined CEQA review for some infill projects such as transit-oriented development. SB 375 would be implemented over the next several years and the Metropolitan Transportation Commission's 2013 RTP would be its first plan subject to SB 375.

Senate Bill 97 (SB 97) required the Office of Planning and Research (OPR) to amend the state CEQA guidelines to address the feasible mitigation of GHG emissions or the effects of GHGs. In response, OPR amended the CEQA guidelines to provide guidance for analyzing GHG emissions. Among other changes to the CEQA

[35] Ibid.

Guidelines, the amendments add a new section to the CEQA Checklist (CEQA Guidelines Appendix G) to address questions regarding the project's potential to emit GHGs.

The Bay Area Air Quality Management District (BAAQMD) is the primary agency responsible for air quality regulation in the nine county San Francisco Bay Area Air Basin (SFBAAB). As part of their role in air quality regulation, BAAQMD has prepared the CEQA air quality guidelines to assist lead agencies in evaluating air quality impacts of projects and plans proposed in the SFBAAB. The guidelines provide procedures for evaluating potential air quality impacts during the environmental review process consistent with CEQA requirements. On June 2, 2010, the BAAQMD adopted new and revised CEQA air quality thresholds of significance and issued revised guidelines that supersede the 1999 air quality guidelines. The *2010 CEQA Air Quality Guidelines* provide for the first time CEQA thresholds of significance for greenhouse gas emissions. OPR's amendments to the CEQA Guidelines as well as BAAQMD's *2010 CEQA Air Quality Guidelines* and thresholds of significance have been incorporated into this analysis accordingly.

The BAAQMD has adopted CEQA thresholds of significance for projects that emit GHGs, one of which is a determination of whether the proposed project is consistent with a Qualified Greenhouse Gas Reduction Strategy, as defined in the *2010 CEQA Air Quality Guidelines*. On August 12, 2010, the San Francisco Planning Department submitted a draft of the City and County of San Francisco's *Strategies to Address Greenhouse Gas Emissions* to the BAAQMD.[36] This document presents a comprehensive assessment of policies, programs and ordinances that collectively represent San Francisco's Qualified Greenhouse Gas Reduction Strategy in compliance with the BAAQMD's *2010 CEQA Air Quality Guidelines* and thresholds of significance.

San Francisco's GHG reduction strategy identifies a number of mandatory requirements and incentives that have measurably reduced greenhouse gas emissions including, but not limited to, increasing the energy efficiency of new and existing buildings, installation of solar panels on building roofs, implementation of a green building strategy, adoption of a zero waste strategy, a construction and demolition debris recovery ordinance, a solar energy generation subsidy, incorporation of alternative fuel vehicles in the City's transportation fleet (including buses and taxis), and a mandatory composting ordinance. The strategy also identifies 42 specific regulations for new development that would reduce a project's GHG emissions.

San Francisco's climate change goals as are identified in the 2008 San Francisco Greenhouse Gas Reduction Ordinance as follows:

[36] San Francisco Planning Department. *Strategies to Address Greenhouse Gas Emissions in San Francisco*. 2010. The final document is available online at: http://www.sfplanning.org/index.aspx?page=1570.

- By 2008, determine the City's 1990 GHG emissions, the baseline level with reference to which target reductions are set;
- Reduce GHG emissions by 25 percent below 1990 levels by 2017;
- Reduce GHG emissions by 40 percent below 1990 levels by 2025; and
- Reduce GHG emissions by 80 percent below 1990 levels by 2050.

The City's 2017 and 2025 GHG reduction goals are more aggressive than the State's GHG reduction goals as outlined in AB 32, and consistent with the State's long-term (2050) GHG reduction goals. San Francisco's *Strategies to Address Greenhouse Gas Emissions* identifies the City's actions to pursue cleaner energy, energy conservation, alternative transportation and solid waste policies, and concludes that San Francisco's policies have resulted in a reduction in greenhouse gas emissions below 1990 levels, meeting statewide AB 32 GHG reduction goals. As reported, San Francisco's 1990 GHG emissions were approximately 8.26 million metric tons (MMT) CO_2E and 2005 GHG emissions are estimated at 7.82 $MMTCO_2E$, representing an approximately 5.3 percent reduction in GHG emissions below 1990 levels.

The BAAQMD reviewed San Francisco's *Strategies to Address Greenhouse Gas Emissions* and concluded that the strategy meets the criteria for a Qualified GHG Reduction Strategy as outlined in BAAQMD's CEQA Guidelines (2010) and stated that San Francisco's "aggressive GHG reduction targets and comprehensive strategies help the Bay Area move toward reaching the State's AB 32 goals, and also serve as a model from which other communities can learn."[37]

Depending on a proposed project's size, use, and location, a variety of controls are in place to ensure that a proposed project would not impair the State's ability to meet statewide GHG reduction targets outlined in AB 32, nor impact the City's ability to meet San Francisco's local GHG reduction targets. Given that: (1) San Francisco has implemented regulations to reduce greenhouse gas emissions specific to new construction and renovations of private developments and municipal projects; (2) San Francisco's sustainable policies have resulted in the measured success of reduced greenhouse gas emissions levels; (3) San Francisco has met and exceeded AB 32 greenhouse gas reduction goals for the year 2020; (4) current and probable future state and local greenhouse gas reduction measures will continue to reduce a project's contribution to climate change; and (5) San Francisco's *Strategies to Address Greenhouse Gas Emissions* meet BAAQMD's requirements for a Qualified

[37] Letter from Jean Roggenkamp, BAAQMD, to Bill Wycko, San Francisco Planning Department. October 28, 2010. This letter is available online at: http://www.sfplanning.org/index.aspx?page=1570. Accessed November 12, 2010.

GHG Reduction Strategy, projects that are consistent with San Francisco's regulations would not contribute significantly to global climate change.

Impact GG-1: The proposed project would generate greenhouse gas emissions, but not in 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)

The proposed project would increase the activity onsite by demolition of an existing office building and construction of a new mixed-use building, which would result in additional vehicle trips and an increase in energy use. The project could also result in an increase in overall water usage, which generates indirect emissions from the energy required to pump, treat and convey water. The project could also result in an increase in discarded landfill materials. Therefore, the proposed project would contribute to annual long-term increases in GHGs as a result of increased vehicle trips (mobile sources) and operations associated with energy use, water use and wastewater treatment, and solid waste disposal.

Based on the BAAQMD's 2010 *CEQA Air Quality Guidelines*, projects that are consistent with San Francisco's *Strategies to Address Greenhouse Gas Emissions* would result in a less than significant impact with respect to GHG emissions. Furthermore, because San Francisco's strategy is consistent with AB 32 goals, projects that are consistent with San Francisco's strategy would also not conflict with the State's plan for reducing GHG emissions. As discussed in San Francisco's *Strategies to Address Greenhouse Gas Emissions*, new development and renovations/alterations for private projects and municipal projects are required to comply with San Francisco's ordinances that reduce greenhouse gas emissions. Requirements that are applicable to the proposed project are shown below in Table 3.

Table 3. Greenhouse Gas Reduction Strategies Applicable to the Proposed Project

Regulation	Requirements	Project Compliance	Discussion
Transportation Sector			
Commuter Benefits Ordinance (Environment Code, Section 421)	All employers must provide at least one of the following benefit programs: 1. A Pre-Tax Election consistent with 26 U.S.C. § 132(f), allowing employees to elect to exclude from taxable wages and compensation, employee commuting costs incurred for transit passes or vanpool charges, or (2) Employer Paid Benefit whereby the employer supplies a transit pass for the public transit system requested by each Covered Employee or reimbursement for equivalent vanpool charges at least equal in value to the purchase price of	X Project Complies ☐ Not Applicable ☐ Project Does Not Comply	The commercial components of the project that would have over 20 employees would be required to comply with the Commuter Benefits Ordinance.

Regulation	Requirements	Project Compliance	Discussion
	the appropriate benefit, or (3) Employer Provided Transit furnished by the employer at no cost to the employee in a vanpool or bus, or similar multi-passenger vehicle operated by or for the employer.		
Transit Impact Development Fee (Administrative Code, Chapter 38)	Establishes the following fees for all commercial developments. Fees are paid to the SFMTA to improve local transit services.	X Project Complies ☐ Not Applicable ☐ Project Does Not Comply	The proposed project would include commercial uses, which are required to comply with these regulations.
Bicycle parking in Residential Buildings (Planning Code, Section 155.5)	(A) For projects up to 50 dwelling units, one Class 1 space for every 2 dwelling units. (B) For projects over 50 dwelling units, 25 Class 1 spaces plus one Class 1 space for every 4 dwelling units over 50.	X Project Complies ☐ Not Applicable ☐ Project Does Not Comply	The project would include 12 bicycle Class 1 bicycle spaces to be located on garage of the mixed use building. The project is required to provide ten Class 1 spaces. Therefore, the proposed project complies with bicycle parking requirements.
Energy Efficiency Sector			
San Francisco Green Building Requirements for Energy Efficiency (SF Building Code, Chapter 13C)	Commercial buildings greater than 5,000 sf will be required to be at a minimum 14% more energy efficient than Title 24 energy efficiency requirements. By 2008 large commercial buildings will be required to have their energy systems commissioned, and by 2010, these large buildings will be required to provide enhanced commissioning in compliance with LEED® Energy and Atmosphere Credit 3. Mid-sized commercial buildings will be required to have their systems commissioned by 2009, with enhanced commissioning by 2011.	X Project Complies ☐ Not Applicable ☐ Project Does Not Comply	The proposed project, with 6,215 square feet of commercial space at the ground floor, would be required to comply with the Green Building Ordinance, which would increase energy efficiency by a minimum of 15% beyond the 2005 Title 24 energy efficiency requirements.
San Francisco Green Building Requirements for Energy Efficiency (SF Building Code, Chapter 13C)	Under the Green Point Rated system and in compliance with the Green Building Ordinance, all new residential buildings will be required to be at a minimum 15% more energy efficient than Title 24 energy efficiency requirements.	X Project Complies ☐ Not Applicable ☐ Project Does Not Comply	See discussion above. The proposed project would be required to comply with the Green Building Ordinance, which would increase energy efficiency by a minimum of 15% beyond the 2005 Title 24 energy efficiency requirements.
San Francisco Green Building Requirements for Stormwater Management (SF Building Code, Chapter 13C) Or San Francisco Stormwater	Requires all new development or redevelopment disturbing more than 5,000 square feet of ground surface to manage stormwater on-site using low impact design. Projects subject to the Green Building Ordinance Requirements must comply with either LEED® Sustainable Sites Credits 6.1 and 6.2, or with the City's Stormwater	X Project Complies ☐ Not Applicable ☐ Project Does Not Comply	The proposed project would disturb over 5,000 square feet, and thus would be required to comply with the SFPUC's stormwater design guidelines, which emphasize low impact development using a variety of Best Management Practices for managing stormwater runoff and reducing impervious surfaces, thereby reducing the volume of

Regulation	Requirements	Project Compliance	Discussion
Management Ordinance (Public Works Code Article 4.2)	ordinance and stormwater design guidelines.		combined stormwater and sanitary sewage requiring treatment.
San Francisco Green Building Requirements for water efficient landscaping (SF Building Code, Chapter 13C)	All new commercial buildings greater than 5,000 square feet are required to reduce the amount of potable water used for landscaping by 50%.	X Project Complies ☐ Not Applicable ☐ Project Does Not Comply	The proposed project, with 6,215 square feet of commercial space at the ground floor, would be required to comply with the Green Building Ordinance for water efficient landscaping.
San Francisco Green Building Requirements for water use reduction (SF Building Code, Chapter 13C)	All new commercial buildings greater than 5,000 sf are required to reduce the amount of potable water used by 20%.	X Project Complies ☐ Not Applicable ☐ Project Does Not Comply	The proposed project, with 6,215 square feet of commercial space at the ground floor, would be required to comply with the Green Building Ordinance for water use reduction.
Residential Water Conservation Ordinance (SF Building Code, Housing Code, Chapter 12A)	Requires all residential properties (existing and new), prior to sale, to upgrade to the following minimum standards: 1. All showerheads have a maximum flow of 2.5 gallons per minute (gpm) 2. All showers have no more than one showerhead per valve 3. All faucets and faucet aerators have a maximum flow rate of 2.2 gpm 4. All Water Closets (toilets) have a maximum rated water consumption of 1.6 gallons per flush (gpf) 5. All urinals have a maximum flow rate of 1.0 gpf 6. All water leaks have been repaired. Although these requirement apply to existing buildings, compliance must be completed through the Department of Building Inspection, for which a discretionary permit (subject to CEQA) would be issued.	X Project Complies ☐ Not Applicable ☐ Project Does Not Comply	The project is a mixed-use building with residential and commercial uses. Therefore, the proposed project would be required to comply with the Residential Water Conservation Ordinance.
Renewable Energy Sector			
San Francisco Green Building Requirements for renewable energy (SF Building Code, Chapter 13C)	By 2012, all new commercial buildings will be required to provide on-site renewable energy or purchase renewable energy credits pursuant to LEED® Energy and Atmosphere Credits 2 or 6. Credit 2 requires providing at least 2.5% of the buildings energy use from on-site renewable sources. Credit 6 requires providing at least 35% of the building's electricity from renewable energy	X Project Complies ☐ Not Applicable ☐ Project Does Not Comply	The proposed project is the construction of a mixed-use building which would be required to comply with the San Francisco Green Building Code.

Regulation	Requirements	Project Compliance	Discussion
	contracts.		
Waste Reduction Sector			
San Francisco Green Building Requirements for solid waste (SF Building Code, Chapter 13C)	Pursuant to Section 1304C.0.4 of the Green Building Ordinance, all new construction, renovation and alterations subject to the ordinance are required to provide recycling, composting and trash storage, collection, and loading that is convenient for all users of the building.	X Project Complies ☐ Not Applicable ☐ Project Does Not Comply	The proposed project is the construction of a mixed-use building which would be required to comply with the San Francisco Green Building Code requirements for solid waste.
Mandatory Recycling and Composting Ordinance (Environment Code, Chapter 19)	The mandatory recycling and composting ordinance requires all persons in San Francisco to separate their refuse into recyclables, compos tables and trash, and place each type of refuse in a separate container designated for disposal of that type of refuse.	X Project Complies ☐ Not Applicable ☐ Project Does Not Comply	The proposed project is the construction of a mixed-use building which would be required to comply with the Mandatory Recycling and Composting Ordinance.
San Francisco Green Building Requirements for construction and demolition debris recycling (SF Building Code, Chapter 13C)	These projects proposing demolition are required to divert at least 75% of the project's construction and demolition debris to recycling.	X Project Complies ☐ Not Applicable ☐ Project Does Not Comply	The proposed project is the demolition of an office building and new construction of a mixed-use building which would be required to comply with the San Francisco Green Building for demolition debris.
Environment/Conservation Sector			
Street Tree Planting Requirements for New Construction (Planning Code Section 428)	Planning Code Section 143 requires new construction, significant alterations or relocation of buildings within many of San Francisco's zoning districts to plant on 24-inch box tree for every 20 feet along the property street frontage.	X Project Complies ☐ Not Applicable ☐ Project Does Not Comply	Planning Code Section 143 requires new construction, significant alterations or relocation of buildings within many of San Francisco's zoning districts to plant one 24-inch box tree for every 20 feet along the property street frontage. In conformance with Planning Code section 143, the proposed project would plant seven trees along Columbus Avenue for every 20 feet along the property lines.
Wood Burning Fireplace Ordinance (San Francisco Building Code, Chapter 31, Section 3102.8)	Bans the installation of wood burning fire places except for the following: • Pellet-fueled wood heater • EPA approved wood heater • Wood heater approved by the Northern Sonoma Air Pollution Control District	X Project Complies ☐ Not Applicable ☐ Project Does Not Comply	The proposed project would not include any wood burning fireplaces.

The proposed project would be required to comply with these requirements, and was determined to be consistent with San Francisco's *Strategies to Address Greenhouse Gas Emissions.*[38] As such, the proposed project would result in a less-than-significant impact with respect to GHG emissions.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
9. WIND AND SHADOW—Would the project:					
a) Alter wind in a manner that substantially affects public areas?	☐	☐	☒	☐	☐
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	☐	☐	☒	☐	☐

Impact WS-1: The proposed project would not alter wind in a matter that substantially affects public areas. (Less than Significant)

Winds in San Francisco are generally from the west, off the Pacific Ocean. Wind speeds, in general, are greatest in the spring and summer, and lowest in the fall, and generally the strongest wind (speed) is in the late afternoon and the lightest is in the morning.

Ground-level wind accelerations near buildings are controlled by three main elements: exposure, massing, and orientation. Exposure is a measure of the extent that the building extends above surrounding structures into the wind stream. A building that is surrounded by taller structures is not likely to cause adverse wind accelerations at ground level. Building massing controls how much wind is intercepted by a structure and patterns of wind distribution and accelerations. In general, a flat façade would have a greater potential for wind acceleration, particularly at the ground level, as compared to an articulated façade, i.e. buildings with unusual shapes or that utilize set-backs. Similar to massing, orientation determines how much wind is intercepted by the structure, a factor that directly determines wind acceleration. In general, buildings that are oriented with their wide axis across the prevailing wind direction will have a greater impact on ground-level winds than a building oriented with its long axis along the prevailing wind direction. As described in the project description and Figures 2 – 9, the proposed project would construct an irregularly shaped, mixed-use building, and would not have a flat façade.

[38] Greenhouse Gas Reduction Strategies Applicable for 1255-1275 Columbus Avenue. November 12, 2010. This document is on file and available for public review at the Planning Department, 1650 Mission Street, Suite 400.

The project site, which is currently occupied by three-story building, is located on the corner of Columbus Avenue, North Point, and Leavenworth Streets. The buildings across the street from project site are three stories in height, and the buildings in the immediate project vicinity range from two to four stories in height. The proposed height of the building at 40' would be one story taller than the existing office building, which is 32 feet tall. The proposed building would not be sheltered from prevailing winds due to its location at the intersection of three roadways.

Based on consideration of the height, massing, and orientation of the proposed project, the proposed building would not have the potential to cause significant changes to the wind environment in pedestrian areas adjacent or near the site. The proposed project would not affect the climate either in the neighborhood or regionally. Accordingly, the proposed project would result in a less-than-significant wind impact.

Impact WS-2: The proposed project would not create new shadow in a manner that could substantially affect outdoor recreation facilities or other public areas. (Less than Significant)

Section 295 of the *Planning Code* was adopted in response to Proposition K (passed November 1984) in order to protect certain public open spaces from shadowing by new structures during the period between one hour after sunrise and one hour before sunset, year round. *Planning Code* Section 295 restricts net new shadow on public open spaces under the jurisdiction of, or to be acquired by, the Recreation and Park Department, by any structure exceeding 40 feet, unless the Planning Commission, in consultation with the Recreation and Park Commission, finds the impact to be less than significant. The nearest public open spaces to the project site are the Joseph Conrad Mini-Park (one block north of the project site); Russian Hill Park (two blocks southwest of the project site); Fay Park (three blocks south of the project site); Aquatic Park (two blocks northwest of the project site); and North Beach Playground (five blocks southeast of the project site).

The proposed project would not increase the total amount of shading above levels that are common and generally accepted in urban areas. The height of the building at 40 feet and the distance between the project site and Joseph Conrad Mini-Park would prevent any project-related shadows on the Park. The proposed project would not exceed 40 feet, and therefore Section 295 would not apply and the proposed project would not be considered to have a significant impact on shadows.

For the reasons discussed above, the proposed project's impacts related to wind and shadows, both individually and cumulatively, are considered less than significant under CEQA.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
10. 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?	☐	☐	☒	☐	☐
c) Physically degrade existing recreational resources?	☐	☐	☐	☒	☐

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

In 1998, the City of San Francisco initiated the Great Parks for a Great City Assessment Project to determine the condition of the park system as well as to determine future needs. In August of 2004, the San Francisco Recreation and Park Department published a Recreation Assessment Report that evaluates the recreation needs of San Francisco residents.[39] Nine service area maps were developed for the Recreation Assessment Report. The service area maps were intended to help Recreation and Park Department staff and key leadership assess where services are offered, how equitable the service delivery is across the City and how effective the service is as it applies to participating levels overlaid against the demographics of where the service is provided. The project site is not located within an area of the City that was determined to be underserved for parks and recreation facilities. Parks and recreation facilities in the area include Joseph Conrad Mini-Park (one block north of the project site); Russian Hill Park (two blocks southwest of the project site); Fay Park (three blocks south of the project site); Aquatic Park (two blocks northwest of the project site); and North Beach Playground (five blocks southeast of the project site). The addition of 39 projected residents would incrementally increase the demand for park and recreation services and facilities in the area, but not in excess of the amounts provided for in the project vicinity. Based on overall current use of the surrounding parks, the park would accommodate this demand.

The proposed project would provide on-site open space for passive recreational use for project residents through private rear yard and deck at the first residential level (the building's second level), which would total

[39] San Francisco Recreation and Park Department, Recreation Assessment Report, August 2004. This document is on file and available for public review by appointment at the Planning Department, 1650 Mission Street, 4th Floor, and is available online at http://www.parks.sfgov.org/site/recpark_index.asp?id=27310.

approximately 1,525 square feet in size. Additionally, 10 residential units would have 100 square feet of open space in the form of private decks. The provision of private and common open space would provide recreation and outdoor opportunities on the site, reducing the impacts of the project on surrounding recreation areas.

With the projected addition of 57 new residents to the area, the proposed project would not require the construction or expansion of offsite recreation facilities. The increase in demand would not be in excess of amounts expected and provided for in the area and the City as a whole. The additional use of the recreational facilities would be relatively minor compared with the existing use and therefore, the proposed project would not result in substantial physical deterioration of existing recreational resources. The impact on recreational facilities would, therefore, be less than significant.

Impact RE-2: The proposed project would include some limited outdoor recreational facilities, but would not require construction or expansion of recreational facilities that would have an adverse physical effect on the environment. (Less than Significant)

As discussed above, the proposed project would provide some open space on site for the residents, in the form of a rear deck and private decks for some units.

Residents at the project site would be within walking distance of the above-noted parks and open spaces. Although the proposed project would introduce a new permanent population to the project site, the number of new residents projected would not substantially increase demand for or use of either neighborhood parks and recreational facilities (discussed above) or citywide facilities such as Golden Gate Park such that any increased user demand would require the construction of new recreational facilities or the expansion of existing facilities. The project would have no impact on existing recreational facilities.

Impact RE-3: The proposed project would not physically degrade existing recreational facilities. (No Impact)

The project site has no recreational resources that would be affected by the proposed project and construction of the proposed project would not physically degrade existing recreational facilities. Additionally, the incremental increase in demand on existing recreational facilities from the proposed project would not physically degrade existing recreational facilities.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
11. UTILITIES AND SERVICE SYSTEMS— Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐	☐
d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?	☐	☐	☒	☐	☐
e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐	☐

Impact UT-1: Implementation of the proposed project would result in a less-than-significant impact to wastewater collection and treatment facilities and would not require or result in the construction of new storm water drainage facilities or expansion of existing facilities. (Less than Significant)

Project-related wastewater and stormwater would flow to the City's combined stormwater and sewer system and would be treated to standards contained in the City's National Pollutant Discharge Elimination System (NPDES) Permit for the Southeast Water Pollution Control Plant prior to discharge into the Bay. Additionally, during wet weather events, combined sanitary and storm water flows from the project area would be treated at the North Point Wet Weather Facility. Because the NPDES standards are set and regulated by the San Francisco Bay Area Regional Water Quality Control Board (RWQCB), the project would not conflict with RWQCB requirements. The project would not require substantial expansion of wastewater/stormwater treatment facilities or an extension of a sewer trunk line because the site is currently served by existing facilities. Additionally, compliance with the Stormwater Management Ordinance in general will require the project to

maintain or reduce the existing volume and rate of stormwater runoff discharged from the site. To achieve this, the project sponsor would implement and install appropriate stormwater management systems that retain runoff onsite, promote stormwater reuse, and limit site discharges entering the combined sewer collection system. This in turn would limit the incremental demand on both the collection system and wastewater facilities resulting from stormwater discharges, and minimize the potential for upsizing or constructing new facilities. As no new wastewater/stormwater infrastructure would be required to serve the project, this impact would be less than significant.

Impact UT-2: The SFPUC has sufficient water supply and entitlements to serve the proposed project, and implementation of the proposed project would not require expansion or construction of new water treatment facilities. (Less than Significant)

All large-scale projects in California subject to CEQA are required to obtain an assessment from a regional or local jurisdiction water agency to determine the availability of a long-term water supply sufficient to satisfy project-generated water demand under Senate Bill 610 and Senate Bill 221.[40] Under Senate Bill 610, a Water Supply Assessment (WSA) is required if a proposed project is subject to CEQA review in an Environmental Impact Report (EIR) or Negative Declaration and is any of the following: (1) a residential development of more than 500 dwelling units; (2) a shopping center of business employing more than 1,000 persons or having more than 500,000 sf of floor space; (3) a commercial office building employing more than 1,000 persons or having more than 250,000 sf of floor space; (4) a hotel or motel with more than 500 rooms; (5) an industrial or manufacturing establishment housing more than 1,000 persons or having more than 650,000 sf or 40 acres; (6) a mixed-use project containing any of the foregoing; or (7) any other project that would have a water demand at least equal to a 500 dwelling unit project. The proposed project would not exceed any of these thresholds and therefore, would not be required to prepare a WSA.

In the *2005 Urban Water Management Plan*, the SFPUC adopted a resolution finding that the SFPUC's Urban Water Management Plan (UWMP) adequately fulfills the requirements of the water assessment for water quality and wastewater treatment and capacity as long as a project is covered by the demand projections identified in the UWMP, which includes all known or expected development projects and projected development in San Francisco at that time through 2020. The UWMP uses growth projections prepared by the Planning Department and Association of Bay Area Governments (ABAG) to estimate future water demand. As

[40] California Department of Water Resources (2003). Guidebook for Implementation of Senate Bill 610 and Senate Bill 221 of 2001. Available at www.owue.water.ca.gov/Guidebook_101003.pdf.

discussed under Topic 3, Population and Housing, the project would be within the projected population growth for San Francisco. Therefore, the project would not exceed the UWMP's water supply projections.

The proposed project would require water connections per the SFPUC. The proposed project would use existing wastewater and storm drainage infrastructure unless the SFPUC recommends changes to the size and design of this infrastructure.

The proposed project, with an estimated 39 residents, would consume an additional 2,418 gallons of water per day.[41] Although the proposed project would incrementally increase the demand for water in San Francisco, the estimated increase would be accommodated within the City's anticipated water use and supply projections. The new building would be designed to incorporate water-conserving measures, such as low-flush toilets and urinals, as required by the *California State Building Code* Section 402.0(c). Since the proposed water demand could be accommodated by existing and planned water supply anticipated under the SFPUC's *2005 Urban Water Management Plan* and would include water conservation devices, it would not result in a substantial increase in water use and could be served from existing water supply entitlements and resources. Considering all of the above, the proposed project would result in less-than-significant project-specific and cumulative water supply impacts.

Impact UT-3: The proposed project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs. (Less than Significant)

Solid waste generated in San Francisco is transported to and disposed of at the Altamont Landfill. The landfill has a permitted peak maximum daily disposal of 11,150 tons per day and is currently operating at approximately 4,000 to 5,000 tons per day. The landfill has an annual solid waste capacity of 2,226,500 tons from the City of San Francisco. However, the City is well below its allowed capacity, generating approximately 550,000 tons of solid waste in 2005. The Altamont Landfill is expected to remain operational for 20 or more years, and has current plans to increase capacity by adding 250 additional acres of fill area. With the City's increase in recycling efforts and the Altamont Landfill expansion, the City's solid waste disposal demand could be met through at least 2026. Given the existing and anticipated increase in solid waste recycling and the proposed landfill expansion in size and capacity, the impacts on solid waste facilities from the project would be less than significant.

[41] Based on current residential use in San Francisco of 62 gallons per capita per day x 39 residents = 2,418 gallons per day (SFPUC, 2005 Urban Water Management Plan for the City and County of San Francisco, December 2005, p. 40). Available for viewing at www.sfwater.org, accessed for this report on April 14, 2009.

The proposed project would be subject to the City's Mandatory Recycling and Composting Ordinance, which requires all San Francisco residents and commercial landlords to separate their refuse into recyclables, compostables, and trash, thereby minimizing solid waste disposal and maximizing recycling. The project would also be subject to the City's Construction and Demolition Debris Recovery Ordinance, which requires all construction and demolition debris to be transported to a registered facility that can divert a minimum of 65 percent of the material from landfills. Therefore, the project's impact on existing landfill capacity would be less than significant.

Impact UT-4: The construction and operation of the proposed project would follow all applicable statutes and regulations related to solid waste. (Less than Significant)

The California Integrated Waste Management Act of 1989 (AB 939) requires municipalities to adopt an Integrated Waste Management Plan (IWMP) to establish objectives, policies, and programs relative to waste disposal, management, source reduction, and recycling. Reports filed by the San Francisco Department of the Environment showed the City generated 1.88 million tons of waste material in 2002. Approximately 63 percent (1.18 million tons) was diverted through recycling, composting, reuse, and other efforts while 700,000 tons went to a landfill.[42] San Francisco residents currently divert approximately 72 percent of their solid waste to recycling and composting, bringing the City's residents closer to their goal of 75 percent diversion by 2010 and 100 percent by 2020.[43] The solid waste associated with the proposed project's construction would be required to divert 65 percent of all non-hazardous construction waste for recycling and reuse, as required by the Construction, Demolition and Debris Ordinance.

San Francisco Ordinance No. 27-06 requires a minimum of 65 percent of all construction and demolition debris to be recycled and diverted from landfills. Furthermore, the project would be required to comply with City's Ordinance 100-09, the Mandatory Recycling and Composting Ordinance, which requires everyone in San Francisco to separate their refuse into recyclables, compostables, and trash. With waste diversion and expansions that have occurred at the Altamont Landfill, there is adequate capacity to accommodate San Francisco's solid waste.

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42 San Francisco Office of the Controller, Community Indicators Report. Available on the internet at: http://www.sfgov.org/wcm_controller/community_indicators/physicalenvironment/index.htm. Accessed March 12, 2009.

43 San Francisco Department of the Environment. Zero Waste. Website available at: http://sfgov.org/site/frame.asp?u=http://www.sfenvironment.org. Accessed February 11, 2009.

Therefore, solid waste generated from the project's construction and operation would not substantially affect the projected life of the landfill, and no associated impacts related to solid waste would occur.

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

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

The project site currently receives emergency services from the San Francisco Fire Department (SFFD), Station 28 at 1814 Stockton Street, which is approximately seven blocks southeast of the project site, and the San Francisco Police Department (SFPD), Central Station at 776 Vallejo Street, which is approximately eight blocks southeast of the project site. No new stations are proposed in the project vicinity; however, the SFPD and SFFD have sufficient resources to accommodate a project of this size. Given the scale of the proposed project, it would not necessitate the construction of a new police station. Overall, the project would have a less-than-significant impacts on police and fire protection services.

Impact PS-2: The proposed project would indirectly generate school students, but these new students would be accommodated within existing school facilities, and would not require new or physically altered school facilities. (Less than Significant)

The San Francisco Unified School District (SFUSD) provides school services to the project area. Currently, the SFUSD schools nearest the project site include Yick Wo Alternative Elementary School (grades K through five), Garfield Elementary School (grades K through five), Francisco (grades 6 through 8) and Galileo (grades 9 through 12). There are numerous schools at all levels within two miles of the project site. In the last decade, overall SFUSD enrollment has gradually declined. The decline stopped in the fall of 2008, when kindergarten

enrollments began to increase, reflecting a growth in birth rates five years earlier. SFUSD projections indicate that elementary enrollment will continue to grow.[44] The number of elementary school students will eventually rise from 25,000 students in 2008 to 27,600 in 2013, representing an 11 percent increase in five years. After a slight decline in 2009 and 2010, middle school enrollment will increase again. However, in 2013 it will still stand below current enrollment (at 11,640 compared with 11,816 in 2008). High school enrollment will experience a continuous decline over the next five years, from 19,696 students in 2008 to 18,396 in 2013. District-wide enrollment as of Fall 2008 was 55,272. The District currently maintains a property and building portfolio that has a student capacity for over 90,000 students.[45] Thus, even with increasing enrollment, facilities throughout the City and County are underutilized. The increase in students associated with the proposed project would not substantially change the demand for schools, and no new facilities are expected to be needed to accommodate the students. The proposed project would thus result in a less-than-significant impact on schools.

Impact PS-3: The proposed project would increase demand for government services, but not to the extent that would result in significant physical impacts. (Less than Significant)

The incremental population increase of approximately 39 residents and 18 employees that would result from the proposed mixed-use building would not necessitate the need for new or physically altered government facilities and therefore any related impact would be less than significant.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
13. 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 Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒	☐

[44] San Francisco Unified School District, *Capital Plan FY 2010-2019*, September 2009. Available at http://portal.sfusd.edu/data/facilities/FINAL%20APPROVED%20CAPITAL%20PLAN%202010-2019%20Oct%2027%202009.pdf, accessed February 11, 2010.

[45] S.F.U.S.D. School Profiles 2008-2009, http://orb.sfusd.edu/profile/prfl-100.htm, accessed February 11, 2010.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
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 Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒	☐

Impact BIO-1: The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any special status species, sensitive natural community, protected wetlands, or conflict with an adopted conservation plan. (No Impact)

The majority of the area around the project site is covered with structures and other impermeable surfaces. The project site is entirely covered with an office building and surface parking lot. The project site is not located within or near any riparian habitat, sensitive natural community, federally protected wetlands, or adopted conservation plan. The project site is in a developed urban area and does not support or provide habitat for any rare or endangered wildlife species, animal, or plant life or habitat. Therefore, no significant impacts would occur to any special status species, sensitive natural communities, or protected wetlands, nor would the project conflict with an adopted conservation plan.

Impact BIO-2: The proposed project would not interfere with the movement of native resident or wildlife species or with established native resident or migratory wildlife corridors. (Less than Significant with Mitigation)

The proposed project would result in the removal and replacement of 12 significant trees and seven street trees located within the sidewalks directly abutting the project site. Nesting birds, their nests, and eggs are fully protected by *Fish and Game Code* (Sections 3503, 3503.5) and the MBTA. The Migratory Bird Treaty Act (MBTA) protects over 800 species, including geese, ducks, shorebirds, raptors, songbirds, and many relatively common species. Destruction or disturbance of a nest would be a violation of these regulations and is considered a potentially significant impact.

Impacts to nesting birds would most likely occur during the bird nesting period (January 15 through August 15). Implementation of **Mitigation Measure M-BIO-2**, requiring pre-construction surveys for nesting birds, should construction occur during the bird nesting period. The incorporation of **Mitigation Measure M-BIO-2** would reduce potential impacts to nesting birds to a less-than-significant level.

Mitigation Measure M-BIO-2: Pre-Construction Nesting Bird Survey

Bird nesting, protected under the federal Migratory Bird Treaty Act (MBTA), may occur in the project area. Migratory birds include geese, ducks, shorebirds, raptors, songbirds, and seabirds. As described above, a number of non-native trees would be removed from the project site. To reduce potential for effects on nesting birds from non-native tree removal, construction should occur outside the bird nesting season (January 15 to August 15). Bird nesting season is generally recognized to be from March 15 to August 15 in most areas of California, but can begin as early as January 15th in the San Francisco area. If construction during bird nesting cannot be fully avoided, preconstruction nesting surveys should be conducted prior to work in order to comply with the MBTA. The MBTA makes it unlawfully to "take" (kill, harm, harass, shoot, etc.) any migratory bird listed in 50CFR 10, including their nests, eggs, or young. Pursuant to the MBTA, the project sponsor will conduct preconstruction bird nesting surveys within seven days of the start of construction (i.e., active ground disturbance). If active nests are located during the preconstruction bird nesting survey, the project sponsor is required to contact the California Department of Fish and Game for guidance on obtaining and complying with a Section 1081 Agreement, which may include setting up and maintaining a line-of-site buffer area around the active nest and prohibiting construction activities within the buffer; modifying construction activities; and/or removing or relocating active nests.

Impact BIO-3: Implementation of the proposed project would not conflict with local tree protection regulations. (Less than Significant)

The San Francisco Board of Supervisors adopted legislation that amended the City's Urban Forestry Ordinance, Public Works Code Sections 801 et. seq., to require a permit from the DPW to remove any protected trees.[46] Protected trees include landmark trees, significant trees, or street trees located on private or public property anywhere within the territorial limits of the City and County of San Francisco. Article 16 of the San Francisco Public Works Code, the Urban Forestry Ordinance, provides for the protection of "landmark" trees, "significant" trees, and street trees. Landmark trees are designated by the Board of Supervisors upon the recommendation of the Urban Forestry Council, which determines whether a nominated tree meets the qualification for landmark designations by using established criteria (Section 810). Special permits are required to remove a landmark tree on private property or on City-owned property. Significant trees are those trees within the jurisdiction of the Department of Public Works, or trees on private property within 10 feet of the public right-of-way, that meet certain size criteria. To be considered significant, a tree must have a diameter at breast height of more than 12 inches, a height of more than 20 feet, or a canopy of more than 15 feet (Section 810(A)(a)). The removal of significant trees on privately owned property is subject to the requirements for the removal of street trees. As part of the determination to authorize removal of a significant tree, the Director of Public Works is required to consider certain factors related to the tree, including (among others) its size, age, species, and visual, cultural, and ecological characteristics (Section 810A(c)). The removal of "street trees" (trees within the public right-of-way or on land within the jurisdiction of the Department of Public Works) by abutting property owners requires a permit under Article 16 of the San Francisco Public Works Code. A Tree Disclosure Statement for the proposed project identified that there are 12 significant trees and seven street trees on the project site. The proposed project would result in removal and replanting of these 19 trees on the project site. If the Department of Public Works (DPW) grants a permit under Article 16 of the San Francisco Public Works Code, it shall require that replacement trees be planted (at a one-to-one ratio) or that an in-lieu fee be paid (Section 806(b)). Therefore, with the compliance of Section 806(b), the project would not conflict with any local policies or ordinances protecting trees.

As described above, the proposed project would not conflict with any local policies or ordinances protecting biological resources; affect any rare, threatened, or endangered species; diminish habitat; or remove any protected trees. Therefore, the proposed project would not result in any impact to biological resources.

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[46] San Francisco Planning Department, Director's Bulletin No. 2006-01, May 5, 2006, Planning Department Implementation of Tree Protection Legislation, page 2, http://www.sfgov.org/site/uploadedfiles/planning/projects_reports/db2006_01treedisclosuredirector.pdf.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
14. GEOLOGY AND SOILS— Would the project:					
a) Expose people or structures to 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?	☐	☐	☒	☐	☐
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, creating substantial 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 wastewater?	☐	☐	☐	☐	☒
f) Change substantially the topography or any unique geologic or physical features of the site?	☐	☐	☒	☐	☐

Impact GE-1: The proposed project would not result in exposure of people and structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, expansive soils, seismic ground-shaking, liquefaction, lateral spreading, or landslides. (Less than Significant)

A geotechnical report was prepared for the proposed project by Earth Mechanics Consulting Engineers. [47] The geotechnical report found that the project site is entirely underlain by fill to a depth of 19 feet.[48] A subsurface

[47] Earth Mechanics Consulting Engineers, Environmental and Geotechnical Consultants, *Geotechnical Investigation*, September 1, 2009. This report is on file at the Planning Department in Case File No. 2008.0723E, 1650 Mission Street, Suite 400, San Francisco.

investigation conducted for the geotechnical report found a thin layer of native soil is located beneath the fill, and sandstone bedrock was encountered at a depth of 19 feet. The subsurface investigation included three borings drilled to depths of approximately 12 to 20 feet below ground surface (bgs). Groundwater was not encountered to depths of 20 feet during the field exploration. Construction of the proposed project would require excavation to a maximum of about nine and a half feet on the southwest corner of the project site below the existing ground surface of the site and removal of approximately 15,000 cubic yards of soil.

The Community Safety Element of the *General Plan* contains maps that indicate areas of the city where one or more geologic hazards exist. Maps 2 and 3 in the Community Safety Element of the *General Plan* show the intensity of ground shaking in San Francisco from two of the most probable earthquakes, one of magnitude 7.1 on the San Andreas Fault and one of magnitude 7.1 on the northern segment of the Hayward fault. The project site is in a Seismic Hazards Study Zone designated by the California Division of Mines and Geology as an area subject to "extreme" to "heavy" damage from seismic groundshaking along both the Peninsula segment of the San Andreas Fault and the Northern segment of the Hayward fault. The project site is not in an area subject to landslide, seiche, or tsunami run-up, or reservoir hazards (Maps 5, 6, and 7 in the Community Safety Element).[49]

The geotechnical report found low potential for fault rupture, lateral spreading, liquefaction, densification, or landsliding. Based on its San Francisco location, it is likely that the site would experience periodic minor earthquakes and potentially a major (moment magnitude [Mw] greater than 7.1 characteristic) earthquake on one or more of the nearby faults during the life of the proposed development. The closest mapped active fault to the project site is the San Andreas Fault located approximately 10 kilometers to the west. The Working Group for California Earthquake Probabilities estimates a 62 percent probability of an earthquake of Mw 6.7 or greater occurring on one of the major faults in the Bay Area by 2031.[50]

The project site is not within an Earthquake Fault Zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act and no known fault or potentially active fault exists on the site. In a seismically active area, such as the San Francisco Bay Area, the possibility exists for future faulting in areas where no faults previously existed. The geotechnical investigation report for the project site found no evidence of active faulting on the site and concludes that the risk of surface faulting is low. However, during an earthquake along any of the major faults mentioned above, the ground at the project site would experience strong to very strong shaking. Strong shaking

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[48] Earth Mechanics Consulting Engineers, September 1, 2006, op cit

[49] San Francisco Planning Department, Community Safety Element, *San Francisco General Plan*, April 1997.

[50] Earthquake probabilities were analyzed by the Working Group for California Earthquake Probabilities, a group assembled by the U.S. Geological Survey, Earthquake Hazards Program. Its analysis is available online for review at http://quake.usgs.gov/research/seismology/wg02/.

during an earthquake can result in ground failure associated with soil liquefaction, lateral spreading, and differential compaction (also referred to as cyclic densification).

The project site is located in an area defined by the Seismic Hazards Zone as delineated by the California Division of Mines and Geology as historically or potentially subject to liquefaction.[51] However, the geological report stated the soil encountered during the borings is stiff and cohesive, and groundwater was not encountered during drilling to depths of 20 feet. Therefore, it was concluded that there is low potential for liquefaction at the project site. Lateral spreading of lurching is generally caused by liquefaction of marginally stable soils underlying gentle slopes. Because the site has a low potential for liquefaction, it was concluded that the potential for lateral spreading also is low.

The proposed project would be required to conform to the San Francisco Building Code, which ensures the safety of all new construction in the City. Decisions about appropriate foundation design and whether additional background studies are required would be considered as part of the Department of Building Inspection (DBI) review process. Background information provided to DBI would provide for the security and stability of adjoining properties as well as the subject property during construction. Therefore, potential damage to structures from geologic hazards on the project site would be addressed through the DBI requirement for a geotechnical report and review of the building permit application pursuant to its implementation of the Building Code. Any changes incorporated into the foundation design required to meet the Building Code standards that are identified as a result of the DBI review process would constitute minor modifications of the project and would not require additional environmental analysis. In light of the above, the proposed project would not result in a significant effect related to seismic and geologic hazards.

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

The proposed project would not substantially change the topography of the site or any unique geologic or physical features of the site. The project site is at an elevation of approximately 16.5 feet above Mean Sea Level (MSL) and the majority of the project site would require four feet of excavation and only the southwest corner of the project site would require 9.5 feet of excavation. Therefore, the proposed project would result in minimal impacts with respect to changes to topographical features located on the project site. Because the project sponsor is required to implement construction Best Management Practices listed on the Stormwater Pollution Prevention Program "Checklist for Construction Requirements," implementation of erosion and sedimentation control

measures, as required by the City and/or resources agencies, would minimize short-term construction-related erosion impacts to less-than-significant.

Impact GE-3: The proposed project would not use septic tanks or alternative wastewater disposal systems, which would have soils incapable of adequately supporting them. (Not Applicable)

The proposed project would be connected to the existing sewer system and would not require use of septic systems. Therefore, this checklist topic impact is not applicable to the proposed project.

Impact GE-4: The proposed project would not result in impacts to site topographical features. (Less than Significant)

The project site itself is generally flat and has no unique topography. Apart from clearing and minimal site grading for the surface level garage and building foundation, the proposed project would not alter the topography of the project site, or otherwise affect any unique geologic or physical features of the site. The proposed project would have a less than significant impact with respect to topographical features of the site.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
15. HYDROLOGY AND WATER QUALITY— Would the project:					
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion of siltation on- or off-site?	☐	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☐	☒	☐

Topics:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
e)	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?	☐	☐	☒	☐	☐
f)	Otherwise substantially degrade water quality?	☐	☐	☒	☐	☐
g)	Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map?	☐	☐	☒	☐	☐
h)	Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☒	☐	☐
i)	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒	☐
j)	Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒	☐

Impact HY-1: The proposed project would not violate water quality standards or otherwise substantially degrade water quality. (Less than Significant)

The proposed project would not substantially degrade water quality or contaminate a public water supply. All wastewater from the proposed project building, and storm water runoff from the project site, would flow into the city's combined sewer system to be treated at the Southeast Water Pollution Control Plant prior to discharge into San Francisco Bay. Additionally, during wet weather events, combined sanitary and storm water flows from the project area would be treated at the North Point Wet Weather Facility. Treatment would be provided pursuant to the effluent discharge standards contained in the City's National Pollutant Discharge Elimination System (NPDES) permit for the plant. Additionally, compliance with the Stormwater Management Ordinance in general will require the project to maintain or reduce the existing volume and rate of stormwater runoff discharged from the site. To achieve this, the project would implement and install appropriate stormwater management systems that retain runoff onsite, promote stormwater reuse, and limit site discharges before entering the combined sewer collection system.

Over the construction period, there would be a potential for erosion and transportation of soil particles during site preparation, excavation, foundation pouring, and construction of the building shell. Once in surface water, runoff, sediment and other pollutants could leave the construction site and ultimately be released into San Francisco Bay. As discussed above, stormwater runoff from project construction would drain to the combined

sewer and stormwater system and be treated at the Southeast Water Pollution Control Plant. Pursuant to *Building Code* Chapter 33 (Excavation and Grading) and the City's NPDES permit, the project sponsor would be required to implement measures to reduce potential erosion impacts. Therefore, the proposed project would not substantially degrade water quality.

Impact HY-2: The proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. (Less than Significant)

As discussed in Topic 13. Geology and Soils, groundwater was not observed in the borings drilled to a maximum depth of 20 feet below ground surface (bgs). However, groundwater will vary with time and zones of seepage may be encountered near the ground surface following rain or irrigation upslope of the project site. Any groundwater that is encountered during construction of the proposed project is subject to the requirements of the City's Industrial Waste Ordinance (Ordinance Number 199 77), requiring that groundwater meet specified water quality standards before it may be discharged into the sewer system. Therefore, groundwater resources would not be substantially degraded or depleted, and the project would not substantially interfere with groundwater recharge.

Impact HY-3: The proposed project would not result in altered drainage patterns that would cause substantial erosion or flooding or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. (No Impact)

The project site is completely covered with impervious surfaces and natural groundwater flow would continue under and around the site. Construction of the proposed project would not increase impervious surface coverage on the site nor reduce infiltration and groundwater recharge. Additionally, compliance with the SMO will require the project to maintain or reduce the existing volume and rate of stormwater runoff at the site by retaining runoff onsite, promoting stormwater reuse, and limiting site discharges before entering the combined sewer collection system. Therefore, the proposed project would not substantially alter existing groundwater quality or surface flow conditions.

Impact HY-4: The proposed project would not expose people, housing, or structures to substantial risk of loss due to flooding. (Less than Significant)

Development in the City and County of San Francisco must account for flooding potential. Areas located on fill or bay mud can subside to a point at which the sewers do not drain freely during a storm (and sometimes during dry weather) and there can be backups or flooding near these streets and sewers. The proposed project falls within an area in the City prone to flooding during storms, especially where ground stories are located below an elevation of 0.0 City Datum or, more importantly, below the hydraulic grade line or water level of the sewer.

The City has implemented a review process to avoid flooding problems caused by the relative elevation of the structure to the hydraulic grade line in the sewers. Applicants for building permits for either new construction, change of use (Planning) or change of occupancy (Building Inspection), or for major alterations or enlargements are referred to the SFPUC for a determination of whether the project would result in ground-level flooding during storms. The side sewer connection permits for these projects need to be reviewed and approved by the SFPUC at the beginning of the review process for all permit applications submitted to the Planning Department, the Department of Building Inspection, or the Redevelopment Agency. The SFPUC and/or its delegate (SFDPW, Hydraulics Section) will review the permit application and comment on the proposed application and the potential for flooding during wet weather. The SFPUC will receive and return the application within a two-week period from date of receipt. The permit applicant shall refer to SFPUC requirements for information required for the review of projects in flood-prone areas. Requirements may include provision of a pump station for the sewage flow, raised elevation of entryways, and/or special sidewalk construction and the provision of deep gutters.

As required, the sponsor coordinated with SFPUC in order to determine if the project would result in ground-level flooding during storms. SFPUC determined that ground-level flooding would not occur and design measures would not be required to be incorporated.[52] Therefore, the project would result in less-than-significant impact on wastewater systems.

Flood risk assessment and some flood protection projects are conducted by federal agencies including the Federal Emergency Management Agency (FEMA) and the U.S. Army Corps of Engineers (Corps). The flood management agencies and cities implement the National Flood Insurance Program (NFIP) under the jurisdiction of FEMA and its Flood Insurance Administration. Currently, the City of San Francisco does not participate in the NFIP and no flood maps are published for the City. However, FEMA is preparing Flood Insurance Rate

[52] Email Correspondence from Cliff Wong, San Francisco Department of Public Works to Bruce Baumann, Bruce D. Baumann & Associates, March 9, 2009. A copy o this correspondence is available for public review at the Planning Department, 1650 Mission Street, 4th Floor, as part of Case File No. 2008.0723E.

Maps (FIRMs) for the City and County of San Francisco for the first time. FIRMs identify areas that are subject to inundation during a flood having a 1 percent chance of occurrence in a given year (also known as a "base flood" or "100-year flood"). FEMA refers to the flood plain that is at risk from a flood of this magnitude as a special flood hazard area ("SFHA").

Because FEMA has not previously published a FIRM for the City and County of San Francisco, there are no identified SFHAs within San Francisco's geographic boundaries. FEMA has completed the initial phases of a study of the San Francisco Bay. On September 21, 2007, FEMA issued a preliminary FIRM of San Francisco for review and comment by the City. The City has submitted comments on the preliminary FIRM to FEMA. FEMA anticipates publishing a revised preliminary FIRM in 2011, after completing the more detailed analysis that Port and City staff requested in 2007. After reviewing comments and appeals related to the revised preliminary FIRM, FEMA will finalize the FIRM and publish it for flood insurance and floodplain management purposes.

FEMA has tentatively identified SFHAs along the City's shoreline in and along the San Francisco Bay consisting of Zone A (in areas subject to inundation by tidal surge) and Zone V (areas of coastal flooding subject to wave hazards).[53] On June 10, 2008, legislation was introduced at the San Francisco Board of Supervisors to enact a floodplain management ordinance to govern new construction and substantial improvements in flood prone areas of San Francisco, and to authorize the City's participation in NFIP upon passage of the ordinance. Specifically, the proposed floodplain management ordinance includes a requirement that any new construction or substantial improvement of structures in a designated flood zone must meet the flood damage minimization requirements in the ordinance. The NFIP regulations allow a local jurisdiction to issue variances to its floodplain management ordinance under certain narrow circumstances, without jeopardizing the local jurisdiction's eligibility in the NFIP. However, the particular projects that are granted variances by the local jurisdiction may be deemed ineligible for federally-backed flood insurance by FEMA.

The Board of Supervisors adopted the Floodplain Management Ordinance on March 23, 2010. The Ordinance indicated FEMA should issue the final FIRM in early 2011. The Department of Public Works will publish flood maps for the City, and applicable City departments and agencies may begin implementation for new construction and substantial improvements in areas shown on the Interim Floodplain Map.

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[53] City and County of San Francisco, Office of the City Administrator, National Flood Insurance Program Flood Sheet, http://www.sfgov.org/site/uploadedfiles/risk_management/factsheet.pdf, accessed July 31, 2008

According to the preliminary map, the project site is not located within a flood zone designated on the City's interim floodplain map. Therefore, the project would result in less than significant impacts related to placement of mixed-use building within a 100-year flood zone.

Impact HY-5: The proposed project would not expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow. (No Impact)

The project site is not on the San Francisco 20-foot Tsunami Runup Map; therefore, no significant tsunami hazards exist at the site. A seiche is an oscillation of a water body, such as a bay, which may cause local flooding. A seiche could occur on the San Francisco Bay due to seismic or atmospheric activity. However, based on the historical record, seiches are rare and there is no significant seiche hazard at the site. There is no mudslide hazard at the project site because the site and vicinity are fully-developed with no erosion-prone slopes. Thus, there would be no project-related significant impacts from seiche, tsunami or mudflow hazard.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
16. 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 for people residing or working in the project area?	☐	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☐	☒

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐	☐
h) Expose people or structures to a significant risk of loss, injury or death involving fires?	☐	☐	☒	☐	☐

The project site is not located near a public or private airport or within an airport land use plan area. Therefore, Initial Study Checklist Items 16e and f would not apply to the proposed project.

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

The proposed project would result in the use of relatively small quantities of hazardous materials for routine purposes. The development would likely handle common types of hazardous materials, such as cleaners and disinfectants. These products are labeled to inform users of potential risks and to instruct them in appropriate handling procedures. Most of these materials are consumed through use, resulting in relatively little waste. Businesses are required by law to ensure employee safety by identifying hazardous materials in the workplace, providing safety information to workers who handle hazardous materials, and adequately training workers. For these reasons, hazardous materials used during project operation would not pose any substantial public health or safety hazards related to hazardous materials. Thus, there would be less-than-significant impacts related to the use of hazardous materials, with development of the proposed project.

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

A Phase 1 Environmental Site Assessment (ESA) was prepared for the project site and is summarized below.[54] The Phase 1 ESA addresses the potential for hazardous materials exposure that could result from project construction. The Phase 1 ESA describes current and prior uses on the site, reviews environmental agency databases and records, reports site reconnaissance observations, and summarizes potential soil and

[54] ACC Environmental Consultants, Phase 1 Environmental Site Assessment (Phase 1 ESA) for 1255 – 1275 Columbus Avenue and 2670 Leavenworth Street, San Francisco, California, prepared by Ms. Catie Hawkins, April 13, 2007. This report is on file at the Planning Department in Case File No. 2008.0723E, 1650 Mission Street, Suite 400, San Francisco.

groundwater contamination issues. This section addresses the potential hazards on the site, and the Phase 1 ESA.

Prior uses of the project site were identified through a review of building permits, historical Sanborn Fire Insurance maps, Polk and Haines City Directories available at the San Francisco Public Library, and aerial photographs. The subject property was vacant prior to 1913. In 1913 the subject property was occupied with tenements along the southwestern corner and commercial businesses along the southeast corner. These buildings were demolished in 1935 and the site was developed with a business with a small office building. The existing office building was then constructed in 1954.

The project site is not listed on a federal or State database for sites known to be impacted by hazardous materials, nor is the project site into proximity to any properties listed on the State Contaminant List. It was determined that the surrounding area had several properties that were on federal and State environmental agency databases. The Phase 1 found two sites on the CERLIS NFRAP list; 52 sites on the Leaking Underground Storage Tank (LUST) Database; two sites on the Underground Storage Tank Database; one site on the RCRA Large Quantity Generators list, and two sites on the RCRA Small Quantity Generators. The Phase 1 determined that based on the relative distance between the project site and these sites, the fact that many sites had received regulatory case closure, and none of these sites were adjoining the subject property, the surrounding properties did not represent a recognized environmental concern. The Phase 1 ESA did not reveal any recognized environmental conditions at the project site. The Phase 1 ESA did not identify that the project site was located within an area of the City regulated by Article 22A.

The project site is located within the area of the City regulated by Article 22A of the San Francisco Health Code, also known as the "The Maher Ordinance". The Maher Ordinance applies to that portion of the City bayward of the original high tide line, where past industrial uses and fill associated with the 1906 earthquake and bay reclamation often left hazardous waste residue in soils and groundwater. The ordinance requires that soils must be analyzed for hazardous wastes if more than 50 cubic yards of soil are to be disturbed. The City adopted Ordinance 253-86 (signed by the Mayor on June 27, 1986), which requires analyzing soil for hazardous wastes within specified areas, known as the Maher area, when over 50 cubic yards of soil is to be disturbed and on sites specifically designated by the Director of Public Works. In accordance with the Maher Ordinance, the project sponsor conducted subsurface investigations of the soils on the project site. [55] Even though the Phase 1 report did not identify any recognized environmental conditions at the project site, the presence of fill materials in

[55] ERS, Limited Subsurface Investigation for 1275 Columbus Avenue, San Francisco, April 2009.

areas of the City that burned following the 1906 earthquake represented an environmental concern.[56] The investigations determined that the arsenic and lead levels exceeded the Regional Water Quality Control Board's (RWQCB) Environmental Screening Levels (ESLs) for residential soils.

The proposed project would require excavation to four feet below ground surface (bgs) on 95% of the project site, and 9.5 feet on the southwest corner of the project site. The excavation could result in removal of contaminated soils.[57] Implementation of Mitigation Measure **M-HZ-2a** would reduce the projects' impacts related to contaminated soils to a less-than- significant level.

Mitigation Measure M-HZ-2a: Site Mitigation Plan

Based on the potential for encountering contaminated soils during site excavation, the SFDPH has determined that the preparation of a Site Mitigation Plan (SMP) is warranted. The SMP shall include a discussion of the level of contamination of soils on the project site and mitigation measures for managing contaminated soils on the site, including, but not limited to: 1) the alternatives for managing contaminated soils on the site (e.g., encapsulation, partial or complete removal, treatment, recycling for reuse, or a combination); 2) the preferred alternative for managing contaminated soils on the site and a brief justification; and 3) the specific practices to be used to handle, haul, and dispose of contaminated soils on the site. The SMP shall be submitted to the SFDPH for review and approval. A copy of the SMP shall be submitted to the Planning Department to become part of the case file.

The SFDPH concluded that the preparation of the SMP, including confirmatory sampling at the bottom of the excavation area, along with the garage ventilation, would remove and address any potential source of soil vapors or related hazards to potentially contaminated soils.[58]

Step 1: Handling, Hauling, and Disposal of Contaminated Soils

Specific Work Practices: Based on the results of the soil tests conducted, the SFDPH determined that the soils on the project site are contaminated at or above potentially hazardous levels. The construction contractor shall be alert for the presence of such soils during excavation of the building slab on the project site (detected through

[56] ERS, Work Plan – Limited Subsurface Investigation for 1275 Columbus Avenue, San Francisco, March 23, 2009

[57] City and County of San Francisco Department of Public Health, Division of Occupational and Environmental Health, letter to Russian Hill Corners, LLC, March 3, 2009. This document is on file and available for public review by appointment at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, as part of the Case File No. 2008.00723E.

[58] SFDPH, March 3, 2009. op cit.

soil odor, color, and texture and results of on-site soil testing), and shall be prepared to handle, profile (i.e., characterize), and dispose of such soils appropriately (i.e., as dictated by local, state, and federal regulations) when such soils are encountered on the site.

(a) Dust Suppression: Soils exposed during excavation for site preparation and project construction activities shall be kept moist throughout the time they are exposed, both during and after work hours.

(b) Surface Water Runoff Control: Where soils are stockpiled, visqueen shall be used to create an impermeable liner, both beneath and on top of the soils, with a berm to contain any potential surface water runoff from the soil stockpiles during inclement weather.

(c) Soils Replacement: If necessary, clean fill or other suitable material(s) shall be used to bring portions of the project site, where contaminated soils have been excavated and removed, up to construction grade.

(d) Hauling and Disposal: Contaminated soils shall be hauled off the project site by waste hauling trucks appropriately certified with the State of California and adequately covered to prevent dispersion of the soils during transit, and shall be disposed of at a permitted hazardous waste disposal facility registered with the State of California.

Step 2: Preparation of Closure/Certification Report

After excavation for the garage for the project, the project sponsor shall prepare and submit a closure/certification report to the SFDPH for review and approval. The closure/certification report to the SFDPH will require additional soil and groundwater sampling to be submitted at the time the excavation is conducted in order to receive final site closure and clearance for redevelopment. Additionally, the closure/certification report shall include the mitigation measures in the SMP for handling and removing contaminated soils from the project site, whether the construction contractor modified any of these mitigation measures, and how and why the construction contractor modified those mitigation measures.

Asbestos

The existing 15,852-square-foot office building on the project site was constructed in 1954. The Phase 1 ESA noted that asbestos-containing materials are located throughout the subject building.[59] Section 19827.5 of the California Health and Safety Code, adopted January 1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The BAAQMD is vested

[59] ACC Environmental Consultants, Phase 1, April 13, 2007, op. cit

by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and is to be notified ten days in advance of any proposed demolition or asbestos abatement work. The notification must include: (1) the names and addresses of the operations; (2) the names and addresses of persons responsible; and (3) the location and description of the structure to be demolished/altered, including size, age, and prior use, and the approximate amount of friable asbestos; (4) scheduled starting and completion dates of demolition or asbestos abatement work; (5) nature of the planned work and methods to be employed; (6) procedures to be employed to meet BAAQMD requirements; (7) and the name and location of the waste disposal site to be used. The BAAQMD randomly inspects asbestos removal operations. In addition, the BAAQMD will inspect any removal operation about which a complaint has been received. Any ACBM disturbance at the project site would be subject to the requirements of BAAQMD Regulation 11, Rule 2: Hazardous Materials; Asbestos Demolition, Renovation and Manufacturing.

The local office of the State Occupational Safety and Health Administration must also be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow State regulations contained in 8CCR1529 and 8CCR341.6 through 341.14 where there is asbestos-related work involving 100 square feet or more of asbestos containing material. Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractor and hauler of the material are required to file a Hazardous Waste Manifest that details the hauling of the material from the site and the disposal of it. Pursuant to California Law, the Port of San Francisco Building Department would not issue the required permit until the applicant has complied with the notice requirements described above.

Lead-Based Paint

Lead paint may be found in buildings constructed prior to 1978 and proposed for demolition. The Phase 1 ESA noted that lead-based paint materials may be present on the subject building and a lead based paint survey is recommend prior to demolition, sanding, or scraping.[60] Demolition must be conducted in compliance with Section 3423 of the *San Francisco Building Code (Building Code),* Work Practices for Exterior Lead-Based Paint on Pre-1979 Buildings and Steel Structures. Where there is any work that may disturb or remove lead paint on the exterior of any building, or the interior of occupied buildings (E3, R1, or R3 occupancy classifications) built prior to or on December 31, 1978, Section 3423 requires specific notification and work standards, and identifies prohibited work methods and penalties.

[60] ACC Environmental Consultants, Phase 1, April 13, 2007, op. cit

Section 3423 applies to buildings or steel structures on which original construction was completed prior to 1979, which are assumed to have lead-based paint on their surfaces unless a certified lead inspector/assessor tests surfaces for lead and determines it is not present according to the definitions of Section 3423. The ordinance contains performance standards, including establishment of containment barriers, at least as effective at protecting human health and the environment as those in HUD Guidelines (the most recent Guidelines for Evaluation and Control of Lead-Based Paint Hazards) and identifies prohibited practices that may not be used in disturbance or removal of lead-based paint. Any person performing work subject to the ordinance shall make all reasonable efforts to prevent migration of lead paint contaminants beyond containment barriers during the course of the work, and any person performing regulated work shall make all reasonable efforts to remove all visible lead paint contaminants from all regulated areas of the property prior to completion of the work.

The Ordinance also includes notification requirements, contents of notice, and requirements for project site signs. Prior to commencement of exterior work that disturbs or removes 100 or more square feet or 100 or more linear feet of lead-based paint in total, the responsible party must provide the Director of the DBI with written notice that describes the address and location of the proposed project; the scope and specific location of the work; whether the responsible party has reason to know or presume that lead-based paint is present; the methods and tools for paint disturbance and/or removal; the approximate age of the structure; anticipated job start and completion dates for the work; whether the building is residential or nonresidential; whether it is owner-occupied or rental property; the approximate number of dwelling units, if any; the dates by which the responsible party has or will fulfill any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager number of the party who will perform the work. Further notice requirements include: a Post Sign notifying the public of restricted access to work area, a Notice to Residential Occupants, Availability of Pamphlet related to protection from lead in the home, and Early Commencement of Work (by Owner, Requested by Tenant), and Notice of Lead Contaminated Dust or Soil, if applicable. The ordinance contains provisions regarding inspection and sampling for compliance by DBI, and enforcement, and describes penalties for non-compliance with the requirements of the ordinance.

These regulations and procedures, already established as part of the building permit review process, would ensure that potential impacts of the proposed project due to the presence of lead-based paint would be reduced to a less-than-significant level.

Other Potential Hazardous Building Materials

In addition to asbestos-containing building materials and lead-based paint, the existing buildings on the site may contain other potentially hazardous building materials such as polychlorinated biphenyls (PCBs), contained primarily in exterior paint, sealants, electrical equipment, and fluorescent light fixtures. Fluorescent light bulbs are also regulated (for their disposal) due to their mercury content. Inadvertent release of such materials during demolition could expose construction workers, occupants, or visitors to these substances and could result in various adverse health effects if exposure were of sufficient quantity. Although abatement or notification programs described above for asbestos and lead-based paint have not been adopted for PCB's, mercury, or other possible hazardous materials, items containing these substances that are intended for disposal must be managed as hazardous waste and handled in accordance with Occupational Safety and Health Administration (OSHA) worker protection requirements. Potential impacts associated with encountering hazardous building materials such as PCB's, mercury, and lead would be considered a potentially significant impact. Hazardous building materials sampling and abatement pursuant to existing regulations prior to renovation work, as described in **Mitigation Measure M-HZ-2b**, below, would reduce potential impacts associated with potentially toxic building materials to a less-than-significant level.

Mitigation Measure M-HZ-2b: Other Hazardous Building Materials

The project sponsor would ensure that building surveys for PCB- and mercury-containing equipment (including elevator equipment), hydraulic oils, and fluorescent lights are performed prior to the start of renovation. Any hazardous materials so discovered would be abated according to federal, State, and local laws and regulations.

Impact HZ-3: The project site is not located within one-quarter mile of an existing school and therefore would not emit hazardous emissions or handle hazardous material within the vicinity of a school (Less than Significant)

The SFUSD schools nearest the project site include Yick Wo Alternative Elementary School (grades K through five), Garfield Elementary School (grades K through five), Francisco (grades 6 through 8) and Galileo (grades 9 through 12). All of these schools are located further than one-quarter mile of the project site. Therefore the proposed project would not emit hazardous emissions or materials within one-quarter mile of a school, and this impact would be less than significant.

Impact HZ-4: The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. (No Impact)

Currently the project site is occupied by an existing office building and surface parking lot. The project site is not on the Hazardous Waste and Substances Sites List, commonly called the "Cortese List," compiled by the California Department of Toxic Substances Control (DTSC) pursuant to Government Code Section 65962.5. The project site is not listed in database reports from State and federal regulatory agencies that identify businesses and properties that handle or have released hazardous materials or waste. The project site is located within the boundaries of the Maher area, as discussed above under Impact HZ-2.

Impact HZ-5: The proposed project would not expose people or structures to a significant risk of loss, injury or death involving fires, nor interfere with the implementation of an emergency response plan. (Less than Significant)

San Francisco ensures fire safety primarily through provisions of the Building and Fire Codes. The final building plans are reviewed by the San Francisco Fire Department (as well as DBI), in order to ensure conformance with these provisions. The proposed project includes installing sprinklers and conforming to these standards, which (depending on building type) may also include development of an emergency procedure manual and an exit drill plan. In this way, potential fire hazards (including those associated with hillside development, hydrant water pressure, and emergency access) would be mitigated during the permit review process.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
17. MINERAL AND ENERGY 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?	☐	☐	☐	☐	☒
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	☐	☐	☒	☐	☐

Impact ME-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. (Not Applicable)

All land in San Francisco, including the project site, is designated Mineral Resource Zone 4 (MRZ-4) by the California Division of Mines and Geology (CDMG) under the Surface Mining and Reclamation Act of 1975.61 This designation indicates that there is inadequate information available for assignment to any other MRZ and thus the site is not a designated area of significant mineral deposits. Since the project site is already developed, future evaluation or designation of the site would not affect or be affected by the proposed project. There are no operational mineral resource recovery sites in the project area whose operations or accessibility would be affected by the construction or operation of the proposed project. Thus, the project would not result in the loss of availability of a locally- or regionally-important mineral resource. The project would have no impacts on mineral resources.

Impact ME-2: Implementation of the proposed project would not encourage activities which would result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner. (Less than Significant)

New buildings in San Francisco are required to conform to energy conservation standards specified by the San Francisco Green Building Ordinance (SFGBO), which would require the project to meet various conservation standards. Specifically, the project would be required to achieve 25 GreenPoints, including meeting an energy standard of 15 percent more energy efficient than that required by Title 24, the California Building Code. Documentation showing compliance with the SFGBO standards is submitted with the application for the building permit. The SFGBO and Title 24 are enforced by the Department of Building Inspection. Therefore, the proposed project would not cause a wasteful use of energy and the effects related to energy consumption would not be significant. In light of the above, effects related to energy consumption would not be considered significant.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
18. AGRICULTURE AND FOREST RESOURCES—Would the project					

[61] California Division of Mines and Geology. *Open File Report 96-03*, 1996, and *Special Report 146 Parts I and II*, 1986 and 1987.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)) or timberland (as defined by Public Resources Code Section 4526)?	☐	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use?	☐	☐	☐	☐	☒

Impact AF-1: The proposed project would not result in the conversion of farmland or forest land to non-farm or non-forest use, nor would it conflict with existing agricultural or forest use or zoning. (Not Applicable)

The project site is located within an urban area in the City and County of San Francisco. The California Department of Conservation's Farmland Mapping and Monitoring Program identifies the site as *Urban and Built-Up Land*, which is defined as "… land [that] is used for residential, industrial, commercial, institutional, public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes." Because the project site does not contain agricultural uses and is not zoned for such uses, the proposed project would not convert any prime farmland, unique farmland or Farmland of Statewide Importance to non-agricultural use, and it would not conflict with existing zoning for agricultural land use or a Williamson contract, nor would it involve any changes to the environment that could result in the conversion of farmland. Therefore, the proposed project would have no impacts to agricultural resources.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
19. MANDATORY FINDINGS OF SIGNIFICANCE— Would the project:					
a) Have the potential to 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, 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 would be individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐	☐
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐	☐

As discussed in the above text, the project is anticipated to have only less-than-significant impacts and less-than-significant with mitigation in the areas discussed. The foregoing analysis indentifies potentially significant impacts to archeological resources, migratory birds, and potentially significant impacts resulting from the presence of hazardous materials, which would be mitigated though implementation of mitigation measures discussed above and listed in Section F. on page 91.

a. As discussed in Topic E.4, it is possible that below-ground archeological resources may be present. Any potential adverse effect to CEQA-significant archeological resources resulting from soils disturbance from the proposed project would be reduced to a less-than-significant level by implementation of **Mitigation Measure M-CP-2**, described within Section F. on page 92 of this Initial Study, which addresses the accidental discovery of archeological resources. Accordingly, the proposed project would not result in a significant impact to archeological resources through the elimination of examples of major periods of California history or prehistory.

b. The proposed project and any surrounding development would be anticipated to add activity (including construction activity) to the project vicinity. Cumulative projects occurring within a half – mile vicinity of the proposed project include the North Beach Library and Joe Dimaggio Playground Renovation Master Plan Project and the Jefferson Street Redesign project. The proposed North Beach library and playground project would construct a new library and reconfigure the playground and the Jefferson Street Redesign project is a

street redesign project to incorporate dedicated pedestrian and bicycle space. The proposed project in combination with other cumulative projects would not result cumulative impacts to land use, aesthetics, population and housing, cultural resources, transportation, noise, air quality, greenhouse gas emissions, wind and shadow, recreation, utilities, public services, biological resources, geology, hydrology, hazards, mineral resources, and agricultural resources. The proposed projects' contributions to cumulative traffic at intersections in the vicinity would not be substantial. The proposed project would not be considered to contribute incrementally to cumulative regional air quality conditions, or to contribute to significant cumulative noise impacts. Similarly, the proposed project would be consistent with the land use and height controls for the site and would not contribute to a cumulatively considerable land use or visual impact. No other significant cumulative impacts are anticipated. In summary, the proposed project would not have unavoidable environmental effects that are cumulatively considerable.

c. The proposed project, as discussed in Section C (Compatibility with Existing Zoning and Plans) and Topic E.1 (Land Use and Land Use Planning), would be generally consistent with local land use and zoning requirements. Mitigation Measures M-HZ-2a and 2b, listed in Section F. of this Initial Study, have been incorporated into the proposed project to address the excavation of contaminated soils and removal of hazardous building materials on site in order to reduce these impacts to a less-than-significant level.

F. MITIGATION MEASURES AND IMPROVEMENT MEASURES

MITIGATION MEASURES

The project sponsor has agreed to implement the following mitigation measures to reduce project impacts to a less-than-significant level.

Mitigation Measure M-CP-2

Archaeological Resources. (Accidental Discovery)

The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in CEQA Guidelines Section 15064.5(a)(c). The project sponsor shall distribute the Planning Department archeological resource "ALERT" sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, pile driving, etc. firms); or utilities firm involved in soils disturbing activities within the project site. Prior to any soils disturbing activities being undertaken each contractor is responsible for ensuring that the "ALERT" sheet is circulated to all field personnel including, machine operators, field crew, pile drivers,

supervisory personnel, etc. The project sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) to the ERO confirming that all field personnel have received copies of the Alert Sheet.

Should any indication of an archeological resource be encountered during any soils disturbing activity of the project, the project Head Foreman and/or project sponsor shall immediately notify the ERO and shall immediately suspend any soils disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures should be undertaken.

If the ERO determines that an archeological resource may be present within the project site, the project sponsor shall retain the services of a qualified archeological consultant. The archeological consultant shall advise the ERO as to whether the discovery is an archeological resource, retains sufficient integrity, and is of potential scientific/historical/cultural significance. If an archeological resource is present, the archeological consultant shall identify and evaluate the archeological resource. The archeological consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by the project sponsor.

Measures might include: preservation in situ of the archeological resource; an archaeological monitoring program; or an archeological testing program. If an archeological monitoring program or archeological testing program is required, it shall be consistent with the Major Environmental Analysis (MEA) division guidelines for such programs. The ERO may also require that the project sponsor immediately implement a site security program if the archeological resource is at risk from vandalism, looting, or other damaging actions.

The project archeological consultant shall submit a Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describing the archeological and historical research methods employed in the archeological monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO, copies of the FARR 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 FARR to the NWIC. The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of 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. In instances

of high public interest or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.

Mitigation Measure M-BIO-2: Pre-Construction Nesting Bird Survey

Bird nesting, protected under the federal Migratory Bird Treaty Act (MBTA), may occur in the project area. Migratory birds include geese, ducks, shorebirds, raptors, songbirds, and seabirds. As described above, a number of non-native trees would be removed from the project site. To reduce potential for effects on nesting birds from non-native tree removal, construction should occur outside the bird nesting season (January 15 to August 15). Bird nesting season is generally recognized to be from March 15 to August 15 in most areas of California, but can begin as early as January 15th in the San Francisco area. If construction during bird nesting cannot be fully avoided, preconstruction nesting surveys should be conducted prior to work in order to comply with the MBTA. The MBTA makes it unlawfully to "take" (kill, harm, harass, shoot, etc.) any migratory bird listed in 50CFR 10, including their nests, eggs, or young. Pursuant to the MBTA, the project sponsor will conduct preconstruction bird nesting surveys within seven days of the start of construction (i.e. active ground disturbance). If active nests are located during the preconstruction bird nesting survey, the project sponsor is required to contact the California Department of Fish and Game for guidance on obtaining and complying with a Section 1081 Agreement, which may include setting up and maintaining a line-of-site buffer area around the active nest and prohibiting construction activities within the buffer; modifying construction activities; and/or removing or relocating active nests.

Mitigation Measure M-HZ-2a: Site Mitigation Plan

Based on the potential for encountering contaminated soils during site excavation, the SFDPH has determined that the preparation of a Site Mitigation Plan (SMP) is warranted. The SMP shall include a discussion of the level of contamination of soils on the project site and mitigation measures for managing contaminated soils on the site, including, but not limited to: 1) the alternatives for managing contaminated soils on the site (e.g., encapsulation, partial or complete removal, treatment, recycling for reuse, or a combination); 2) the preferred alternative for managing contaminated soils on the site and a brief justification; and 3) the specific practices to be used to handle, haul, and dispose of contaminated soils on the site. The SMP shall be submitted to the SFDPH for review and approval. A copy of the SMP shall be submitted to the Planning Department to become part of the case file.

The SFDPH concluded that the preparation of the SMP, including confirmatory sampling at the bottom of the excavation area, along with the garage ventilation, would remove and address any potential source of soil vapors or related hazards to potentially contaminated soils.[62]

Step 1: Handling, Hauling, and Disposal of Contaminated Soils

Specific Work Practices: Based on the results of the soil tests conducted, the SFDPH determined that the soils on the project site are contaminated at or above potentially hazardous levels. The construction contractor shall be alert for the presence of such soils during excavation of the building slab on the project site (detected through soil odor, color, and texture and results of on-site soil testing), and shall be prepared to handle, profile (i.e., characterize), and dispose of such soils appropriately (i.e., as dictated by local, state, and federal regulations) when such soils are encountered on the site.

(a) Dust Suppression: Soils exposed during excavation for site preparation and project construction activities shall be kept moist throughout the time they are exposed, both during and after work hours.

(b) Surface Water Runoff Control: Where soils are stockpiled, visqueen shall be used to create an impermeable liner, both beneath and on top of the soils, with a berm to contain any potential surface water runoff from the soil stockpiles during inclement weather.

(c) Soils Replacement: If necessary, clean fill or other suitable material(s) shall be used to bring portions of the project site, where contaminated soils have been excavated and removed, up to construction grade.

(d) Hauling and Disposal: Contaminated soils shall be hauled off the project site by waste hauling trucks appropriately certified with the State of California and adequately covered to prevent dispersion of the soils during transit, and shall be disposed of at a permitted hazardous waste disposal facility registered with the State of California.

Step 2: Preparation of Closure/Certification Report

After excavation for the garage for the project, the project sponsor shall prepare and submit a closure/certification report to the SFDPH for review and approval. The closure/certification report to the SFDPH will require additional soil and groundwater sampling to be submitted at the time the excavation is conducted in order to receive final site closure and clearance for redevelopment. Additionally, the closure/certification report shall include the mitigation measures in the SMP for handling and removing contaminated soils from the

project site, whether the construction contractor modified any of these mitigation measures, and how and why the construction contractor modified those mitigation measures.

Mitigation Measure M-HZ-2b: Other Hazardous Building Materials

The project sponsor would ensure that building surveys for PCB- and mercury-containing equipment (including elevator equipment), hydraulic oils, and fluorescent lights are performed prior to the start of renovation. Any hazardous materials so discovered would be abated according to federal, State, and local laws and regulations.

IMPROVEMENT MEASURES

Improvement Measure I-TR-1: Construction Traffic Measures

The following measures would minimize disruption of the general traffic flow on adjacent streets:

- To the extent possible, truck movements should be limited to the hours between 9:00 AM and 3:30 PM (or other times, if approved by the SFMTA).
- The project sponsor and construction contractor(s) would meet with the Traffic Engineering Division of the SFMTA, the Police Department, the Fire Department, Muni's Street Operations and Special Events Office, the Planning Department, and other City agencies to determine feasible traffic measures to reduce traffic congestion and other potential transit disruption and pedestrian circulation effects during construction of the project.

G. NEIGHBORHOOD NOTIFICATION

A "Notification of Project Receiving Environmental Review" was sent out on April 10, 2009, to the owners of properties within 300 feet of the project site and to occupants of properties adjacent to the project site, as well as to other interested parties**.** The Planning Department received several emails, letters, and telephone calls in response to the notice. Respondents requested to receive further environmental review documents and/or expressed concerns regarding the proposed project. Concerns regarding the proposed project included: (1) construction and operational noise; (2) effects on parking supply; and (3) potential shadow and air circulation effects on neighboring private property. These issues are addressed in the discussion in Section E, Evaluation of Environmental Effects.

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.

DATE January 25, 2011

Bill Wycko
Environmental Review Officer
for
John Rahaim
Director of Planning

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