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Addendum to Environmental Impact Report

Addendum Date:	June 16, 2016
Case No.:	**2010.0305E**
Project Title:	**Sunnydale-Velasco HOPE SF Master Plan**
EIR:	2010.0305E, certified July 9, 2015
Project Sponsor:	Robin Zimbler, Sunnydale Development Co. LLC (415) 677-4009
Lead Agency:	San Francisco Planning Department
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REMARKS

BACKGROUND

A Notice of Preparation (NOP) was published for the Sunnyvale-Velasco HOPE SF Master Plan Project ("original project") EIR on December 19, 2012, and the Final EIR was certified on July 9, 2015 by the San Francisco Planning Commission. Construction of the original project has not yet begun. The original project includes demolition of all 775 existing family and senior housing units, in 94 two-story residential buildings, within the Sunnydale and Velasco public housing development and new construction of approximately 34 new two- to five-story development blocks containing up to 1,700 units of housing, including one-for-one public housing replacement units, affordable rental units and market rate and affordable for-sale units. The original project also includes up to 72,500 square feet of community service, recreational and educational facilities; 11.5 acres of new parks and open spaces; 12.2 acres of a new and reconfigured street network potentially including "green" features including bioswales and landscaping; and up to 16,200 square feet of neighborhood-serving retail space. The original project would occupy approximately 2,843,500 square feet of floor area, a net increase of 2,049,000 square feet compared to the existing development. The heights of the new buildings would range from 40 to 60 feet above ground level, with 18 buildings 40 feet or less in height and 15 buildings 50 feet in height, and one building 60 feet in height. Thirty-three of the buildings would contain family dwelling units; the single 60-foot-tall building would contain senior housing and would have some retail and community services on the ground floor.

The original project would be built in three major phases over a period of 9 to 15 years. During each phase, the existing buildings, streets, and utilities would be demolished first, and rough grading of the streets, building pads and open space would occur. The original project would require about 221,000 cubic yards of soil to be hauled off the site. Maximum excavation depth would be 45 feet below the current ground surface. The original project includes realignment of Sunnydale, Brookdale and Blythedale Avenues and Santos Street and addition of new cross streets to create a street grid that would improve connectivity and access within the development and to Hahn Street. Brookdale Avenue would be realigned to connect with Sunnydale Avenue; new cross streets would connect Blythedale Avenue to Sunnydale Avenue at three different locations; Blythedale Avenue would be realigned at Hahn Street to connect with Sunrise Way; and a pair of new streets would link Blythedale Avenue and Hahn Street one

block north of Sunrise Way. The original project site currently contains 430 off-street surface parking spaces (0.55 spaces per dwelling unit) and 452 on-street parking spaces. The original project would provide approximately 1,437 off-street parking spaces (0.85 spaces per dwelling unit) in underground and at-grade parking garages in mixed-use and residential buildings, and 525 on-street parking spaces. The original project site is 48.8 acres in size.

As part of the original project, the project sponsor has requested a Special Use District (SUD) overlay to the current RM-1 use district and amendment of the Zoning Map to alter the existing 40-X height and bulk district zoning. The SUD would permit less than 100,000 square feet of neighborhood-serving retail and community uses for certain buildings and enable densities to be transferred across blocks. Further, the project sponsor has proposed establishing a Design Standards and Guidelines document that would more specifically detail development requirements and guidelines for internal streets, open spaces, and buildings. In conjunction with the SUD, other zoning map amendments would enable buildings taller than 40 feet.

PROPOSED MODIFICATIONS TO THE ORIGINAL PROJECT

Subsequent to the certification of the Final EIR, the original project design was modified. The modified project differs from that analyzed in the EIR in that the modified project includes development of an additional residential building on a site located at the southeast corner of Sunnydale Avenue and Hahn Street. The newly added site is known as Sunnydale Parcel Q. Sunnydale Parcel Q consists of eight assessor's parcels (Block 6356, Lots 61-68) that together comprise 20,845 square feet (0.48 acres) at 1433-1497 Sunnydale Avenue and 209-221 Hahn Street. Parcel Q is located directly across Sunnydale Avenue from the original project site, which was previously analyzed in a joint Environmental Impact Report/Environmental Impact Statement (EIR/EIS).[1] The site is currently vacant and unpaved, and does not contain any trees. The Parcel Q development would include the construction of up to 70 additional units of affordable housing in a six-story, 65-foot-tall building (up to 81 feet including mechanical and stair penthouses as permitted under the *San Francisco Planning Code*); the new building would also include approximately 37 parking spaces (15,950 square feet) in a podium level. The Parcel Q building would contain approximately 88,550 square feet for residential units, corridors, and common areas (not including the square footage dedicated to parking). The Parcel Q component would expand the size of the approximately 1,700-unit original project by about 4 percent in terms of the number of total dwelling units and total floor area, and about 1 percent in overall site area. The increase in net new dwelling units (total number of dwelling units to be constructed, minus existing units to be demolished) compared to the original project would be about 7.5 percent. As noted, Parcel Q is across the street from the original project site.

Under the modified project, the project site would be expanded to include Parcel Q, which is currently zoned NC-1 (Neighborhood Commercial Cluster District), would be added to the proposed Special Use District. The underlying zoning of Parcel Q would also likely be changed to be consistent with the original project site, and the height and bulk district of Parcel Q would be changed from 40-X to 65-X. Construction of the Parcel Q building is anticipated to begin in 2017 with completion in mid-2019, taking approximately 14-20 months, and would occur coincident with Phase I of the original project. This

[1] Inasmuch as this addendum evaluates changes to the project only in the context of CEQA, no further reference to the EIS is made.

modification would increase the number of units built in Phase I from 521 to 591, or approximately 13 percent. The addition of the proposed development of Parcel Q would not increase the length of construction of either Phase I or the overall modified project, compared to that for the original project.

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

Table 1, below, compares the original project evaluated in the Final EIR with the modified project, which would include the development of Parcel Q.

TABLE 1
COMPARISON OF THE ORIGINAL PROJECT TO THE MODIFIED PROJECT

	Original Project	Parcel Q	Modified Project (Original Project Plus Parcel Q)
Residential	2,185,000 square feet	88,550 square feet	2,273,550 square feet
Retail	16,000 square feet	—	16,000 square feet
Parking	570,000 square feet structured	15,950 square feet structured	585,950 square feet structured
Other	72,500 square feet of recreation building, pavilion, and community services	—	No Change
Total Gross Square Footage (GSF)	2,843,500 GSF	104,500 GSF	2,948,000 GSF
Dwelling units	1,700	70	1,770
Parking spaces	1,437 off-street 525 on-street	37 off-street	Off-street: 1,474 On-street: 525
Number of buildings	34 development blocks	1 development block	35 development blocks
Height of buildings	40-60 feet	65 feet	40-65 feet
Number of stories	2-6	6	2-6

ANALYSIS OF POTENTIAL ENVIRONMENTAL EFFECTS

CEQA Guidelines Section 15164 provides for the use of an addendum to document the basis for a lead agency's decision not to require a Subsequent or Supplemental EIR for a project that is already adequately covered in an existing certified EIR. The lead agency's decision to use an addendum must be supported by substantial evidence that the conditions that would trigger the preparation of a Subsequent EIR, as provided in CEQA Guidelines Section 15162, are not present. This addendum documents the assessment and determination that the modified project is within the scope of the Final EIR and no additional environmental review is required.

The proposed project modifications would not require major revisions of the EIR. The additional square footage and dwelling units would not substantially exceed the assumptions studied for the original project in the EIR (an increase of approximately 4 percent in units and total floor area). The modified

project would not cause new significant impacts not identified in the EIR. In addition, no new mitigation measures would be necessary to reduce significant impacts. Mitigation measures identified in the EIR would be sufficient to reduce any significant impacts of the modified project to a *less than significant* level, except in instances in which the original project would have a significant, unavoidable impact (traffic at certain intersections under cumulative conditions), in which case the modified project, including development of Parcel Q, would likewise have a *significant, unavoidable impact*. No changes have occurred with respect to circumstances surrounding the project that would cause significant environmental impacts to which the proposed project modifications would contribute considerably. No new information has become available that suggests the modified project would cause significant environmental impacts not previously discussed in the EIR, that significant effects previously examined for the original project would be substantially more severe than described in the EIR, that mitigation measures or alternatives previously found infeasible are feasible, or that new feasible mitigation measures or alternatives considerably different from those in the EIR are available to substantially reduce significant impacts.

Many CEQA topics studied in the Final EIR for the original project would not require any further analysis. Those topics are:

- Land Use and Land Use Planning—Development on Parcel Q would not introduce land uses different from the original project, and therefore could not cause any new inconsistencies with surrounding land uses, nor would it divide an existing community by creating any physical barriers, nor would it substantially alter the character of the area. Effects would be *less than significant*, as with the original project.
- Historical Resources—Parcel Q is currently undeveloped, so no historical resources would be demolished. The EIR previously found that there are no identified historical resources on or near the original project site, therefore no indirect effects would result from the modified project. The effects would not be significant, as with the original project.
- Greenhouse Gas Emissions—Development on Parcel Q would, like the original project, comply with the City's adopted policies with respect to greenhouse gas reduction, and therefore would not substantially increase the less-than-significant effects related to greenhouse gas emissions.
- Wind—Based on Planning Department experience with development in San Francisco, buildings up to 85 feet in height have not been found to result in hazardous pedestrian-level wind conditions, and for this reason, the original project was found to result in *less-than-significant* wind impacts. At 65 feet, the Parcel Q building would likewise have *less-than-significant* effects on pedestrian-level winds.
- Recreation—The relatively small increase in residential population due the proposed additional development on Parcel Q (approximately 4 percent) compared to the original project would not substantially increase effects on recreational facilities, and effects would be *less than significant*, as with the original project.
- Utilities and Service Systems— The relatively small increase in residential population (approximately 4 percent) compared to the original project would not substantially increase effects on utilities and service systems. With the addition of the proposed development of Parcel Q, water use would increase from an estimated 0.18 million gallons per day (mgd) to 0.19 mgd, or 3.9 percent. Wastewater generation would increase similarly; neither change would require the construction of new facilities not previously contemplated. As with the original project, Parcel Q development would be subject to the City's Residential Water Conservation

Ordinance and Water Efficient Irrigation Ordinance. The addition of development of Parcel Q to the original project would likewise result in an incremental increase in solid waste generation, but this would be accommodated under the City's existing solid waste disposal contract. Therefore, effects related to utilities and service systems would be *less than significant*, as with the original project.

- Public Services—The relatively small increase in residential population due to the proposed development of Parcel Q (approximately 4 percent) compared to the original project would not substantially increase effects on public services such as police, fire, schools, and libraries, and effects would be *less than significant*, as with the original project.
- Geology and Soils—Given that Parcel Q is immediately across the street from the original project site, soil and groundwater conditions are similar to those at the original site; therefore, effects related to geology and soils, would be the same or similar as those of the original project, and would be *less than significant*. Moreover, development on Parcel Q would, like the original project, be required to comply with *Building Code* provisions related to seismic safety, foundation support, and related issues.
- Hydrology and Water Quality— As with geology and soils, subsurface soil and groundwater conditions are similar beneath Parcel Q to conditions at the original project site. There are no additional sources of contamination that could affect water quality at Parcel Q. Therefore, effects related to hydrology and water quality would be the same or similar as those of the original project, and would be *less than significant*. Moreover, development on Parcel Q would, like the original project, be required to comply with the City's recently updated Stormwater Management Ordinance (Article 4.2 of the *Public Works Code)* and the San Francisco Stormwater Management Requirements and Design Guidelines.
- Mineral and Energy Resources—Effects would be *less than significant*, as with the original project.
- Agricultural and Forest Resources—Effects would be *less than significant*, as with the original project.

The remaining CEQA topics, Population and Housing, Archaeological Resources, Paleontological Resources, Transportation and Circulation, Noise, Air Quality, Biological Resources, Hazards and Hazardous Materials and Shadow, are the focus of the this Memorandum's analysis of potential environmental effects. The analysis of these topics is provided below.

Population and Housing

Final EIR Conclusions for the Original Project

The Final EIR found that the original project would result in a *less-than-significant* impact on population growth because it would not induce substantial population growth, either directly or indirectly. Additionally, the original project would result in a *less-than-significant* displacement of housing impact because, although it would temporarily displace existing housing units and residents, this displacement would not necessitate the construction of replacement housing elsewhere. All existing affordable units on the original project site would be replaced on a one-for-one basis.

Evaluation of Proposed Modifications to the Original Project

The modified project would not result in physical barriers or reduced access that would isolate a particular neighborhood or population group. The original project would better integrate the Sunnydale-

Velasco site into the surrounding neighborhood by aligning streets on the project site with the surrounding street grid and creating a mixed-income community, and the proposed modifications include development of an existing vacant lot, also within the existing street grid. Construction of the proposed building on Parcel Q would occur coincident with Phase I of the original project and would result in little, if any, additional construction employment at the project site. Any increase is anticipated to be accommodated by the existing employment pool. The addition of the proposed development of Parcel Q to the proposed project would include construction of up to 70 additional affordable housing units, resulting in an increase in population in the project area; based on the population density of the original project (2.17 persons per unit), the 70 additional dwelling units would result in approximately 152 additional residents. However, given the existing residential nature of the vicinity and the large scale of planned redevelopment of the adjacent public housing on the original project site, the overall number of new residents added by the modified project would be consistent with neighborhood character and would not result in any new significant impacts or substantially more severe population impacts than those identified in the Final EIR. Furthermore the modified project would provide additional affordable housing consistent with the needs established in the Regional Housing Need Plan for the San Francisco Bay Area. The modified project would not result in permanent displacement of existing residents; the additional 70 units, once built in Phase I, would allow for more existing residents of the original project site to remain in their existing neighborhood during construction of the subsequent two phases. Thus, there would be no new significant impacts or substantially more severe impacts with respect to displacement than identified in the Final EIR. Additionally, development of Parcel Q would incrementally increase the amount of affordable housing provided in the modified project.

Based on this information, the addition of the proposed development of Parcel Q to the original project would not result in any new significant impacts or substantially more severe population or housing displacement impacts than those identified for the original project. No mitigation measures would be required.

Archaeological Resources

Final EIR Conclusions for the Original Project

The Final EIR found that original project's impacts related to archaeological resources would be *less than significant with mitigation* because, while the original project could cause a substantial adverse change in the significance of an archeological resource, the impact would be reduced to a *less-than-significant* level with implementation of Mitigation Measure M-CP-2, Archaeological Testing Program.

Evaluation of Proposed Modifications to the Original Project

An Archaeological Sensitivity Assessment was conducted in 2011 for the original project, which is located across Hahn Street to the west of Parcel Q. The Area of Potential Effect (APE) and records search included a ¼ mile radius from the original project site, which includes Parcel Q and its immediate vicinity. No previously recorded prehistoric or historic-era sites were identified in this search. The APE for Parcel Q consists of the Parcel Q site, which has no structures but has a similar historical ecological setting and geomorphology to the eastern portion of the original project site. Both sites have a moderate sensitivity for prehistoric archeological deposits below relatively shallow artificial fill.

The proposed parking garage on the Parcel Q site would be an at-grade podium, with residential construction above, the same approach as would be used on the original project site. Earthwork or

ground disturbing activities would be to the same or lesser depth than would occur on the eastern, adjacent portion of the original project, to a depth of approximately 3 to 5 feet for proposed foundations. As with the original project, development of Parcel Q could potentially affect previously undiscovered prehistoric resources. The Planning Department has determined in its Preliminary Archeological Review for Parcel Q that the Final EIR mitigation measure requiring archaeological testing would be applicable to the modified project, including Parcel Q (Mitigation Measure M-CP-2, Archaeological Testing Program) and would reduce potential effects to *less than significant*. This determination was established based on the similarity in historical ecological setting and expected geomorphology of the eastern portion of the original project site with that of Parcel Q.[2] Additionally, Mitigation Measure M-CP-4, Inadvertent Discovery of Human Remains, would apply to Parcel Q, and would reduce the potential effect of accidental discovery of human remains to a *less-than-significant* level.

Based on this information, the addition of the proposed Parcel Q development to the original project would not result in any new significant impacts or substantially more severe impacts to archaeological resources than those identified for the original project. Implementation of mitigation identified in the EIR would reduce the impacts of the proposed project modifications to a *less than significant* level, and no new mitigation measures would be required.

As described above, FEIR Mitigation Measure M-CP-2, Archaeological Testing Program, and Mitigation Measure M-CP-4, Inadvertent Discovery of Human Remains, would be applicable to the modified project, including development of Parcel Q.

Paleontological Resources

Final EIR Conclusions for the Original Project

Paleontological resources are the fossilized remains of plants and animals, including vertebrates (animals with backbones), invertebrates (e.g., starfish, clams, snails, and marine coral), and fossils of microscopic plants and animals (microfossils). The age and abundance of fossils depend on the location, topographic setting, and particular geologic formation in which they are found. Fossil discoveries not only provide a historical record of past plant and animal life but can assist geologists in dating rock formations. In addition, fossil discoveries can expand our understanding of the time periods and the geographic ranges of existing and extinct flora and fauna. The Final EIR evaluated site-specific geotechnical reports and paleontological literature from University of California Museum of Paleontology (UCMP) database, and determined that the original project could directly or indirectly destroy a unique paleontological resource or site or unique geological feature.

The Final EIR found that construction could result in inadvertent damage to, or destruction of, fossils that would possibly be unique and/or scientifically important. While the potential for disturbance of paleontological resources is generally limited by the fact that the ground surface at the original project site has been previously disturbed, deeper excavation could occur in areas that are underlain by previously undisturbed soils. Moreover, while the UCMP records search did not identify any fossils found near the original project site, it did identify several fossil localities in the broader region within the same

[2] E-mail from Randall Dean, archeologist, Environmental Planning, San Francisco Planning Department, to Kansai Uchida, Environmental Planner, Environmental Planning, San Francisco Planning Department, March 18, 2016. This and all documents cited herein, unless otherwise stated, are available at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2010.0305E.

geologic units that could be disturbed by the original project. Because a high percentage of the original project site is underlain by Pleistocene alluvium, which has high paleontological potential, construction activities have the potential to affect paleontological resources, a significant impact.

The Final EIR determined that potential effects on paleontological resources would be mitigated to a *less-than-significant* level with implementation of Mitigation Measure M-CP-3a, Paleontological Resources Mitigation Program, Mitigation Measure M-CP-3b, Paleontological resources training; Mitigation Measure M-CP-3c, Assessment and salvage of potential fossil finds; and Mitigation Measure M-CP-3d: Monitoring by a qualified paleontologist during ground disturbing activities.

Evaluation of Proposed Modifications to the Original Project

No new or more severe impacts would occur from development of the Parcel Q site because the physical setting of Parcel Q, including subsurface soil conditions, is similar to that of the original project site. Like the original project site, Parcel Q is underlain by Pleistocene alluvium, which has high potential paleontological resources. While earthwork or ground disturbing activities would be limited for the Parcel Q site, the potential exists for impacts to paleontological resources, as with the original project. Therefore, with implementation of Mitigation Measure M-CP-3a, Paleontological Resources Mitigation Program, Mitigation Measure M-CP-3b, Paleontological resources training; Mitigation Measure M-CP-3c, Assessment and salvage of potential fossil finds; and Mitigation Measure M-CP-3d: Monitoring by a qualified paleontologist during ground disturbing activities, impacts to paleontological resources would be *less than significant*.

Operation of the original project would not directly or indirectly destroy a unique paleontological resource or site or unique geological feature. The proposed development on the Parcel Q site would be similar to the development that would occur on the original project site, and therefore would not have paleontological impacts that are more severe than analyzed in the EIR for the original project.

Transportation and Circulation

Final EIR Conclusions for the Original Project

The Final EIR evaluated transportation impacts for the following four traffic scenarios: 1) Existing Conditions, 2) Existing Conditions plus Project, 3) Year 2030 Cumulative Conditions plus Project; and 4) Year 2040 Cumulative Conditions plus Project. The initial cumulative conditions analysis (year 2030) prepared for the Final EIR/EIS was updated in 2014 to be consistent with the Planning Department's then-current methodology for evaluating cumulative traffic impacts.[3] The update included a revision to the original project's trip generation calculations using the modal split assumptions found in the 2012 American Community Survey data and the development of future cumulative traffic volumes for Year 2040 using the latest outputs from the San Francisco County Transportation Authority's San Francisco Chained Activity Model Process (SF-CHAMP) travel forecasting model.

Traffic

Intersection operating conditions were analyzed at 12 study intersections. All 12 study intersections would continue to operate satisfactorily at LOS C or better under Existing plus Project conditions;

[3] CHS Consulting Group, Memorandum, "Sunnydale-Velasco Housing Development Traffic Study – Update of Traffic and Transit Conditions under Existing Plus Project and 2040 Cumulative Conditions," September 4, 2014.

therefore, the original project impacts on traffic would be *less than significant*. The Final EIR analysis showed that background traffic volumes would grow over time and traffic delays would increase at all 12 study intersections by 2040. The original project would result in a *significant impact* to 2040 Cumulative plus Project operational conditions at the intersection of Sunnydale Avenue/Persia Street during the p.m. peak-hour. Because no feasible mitigation measure exists for this intersection, future cumulative impacts on the Sunnydale Avenue/Persia Street intersection would remain significant and unavoidable. Cumulative impacts at the other 11 study intersections would be *less than significant* under 2040 cumulative conditions. In the 2030 cumulative scenario, however, significant impacts were identified at six intersections because the 2030 scenario analysis methods included the manual addition of traffic from the Candlestick Point-Hunters Point project, whereas the 2040 scenario included that growth in traffic modeling using SF-CHAMP.[4] Mitigation Measures for three intersections (M-CC-TR-1(a), M-CC-TR-1(b), and M-CC-TR-1(a)) call for the San Francisco Municipal Transportation Agency (SFMTA) to monitor the intersections of Sunnydale Avenue and Schwerin Street, Geneva Avenue and Santos Street, and Geneva Avenue and Schwerin Street, respectively, and to implement turn pockets and, in two cases, adjust signal timing, if the intersection degrades below acceptable levels. However, cumulative 2030 impacts at these intersections, and at three others—Sunnydale Avenue and Bayshore Boulevard, Geneva Avenue and Bayshore Boulevard, and Visitacion Avenue and Bayshore Boulevard—where no mitigation was identified would be *significant and unavoidable* due to the uncertainty of implementing feasible mitigation and the fact that required signal timing changes would not be feasible. Therefore, only Mitigation Measure M-CC-TR-1a, Monitoring of the intersection of Sunnydale Avenue and Schwerin Street is feasible and applicable to the modified project.

Transit

The Final EIR found that original project impacts related to transit would be *less than significant* for both Existing plus Project and 2040 Cumulative plus Project conditions because the original project would not increase the bus travel time by more than half of its headway, and the original project's contribution to the local and regional transit screenlines would not exceed the respective capacity utilization standards.

Pedestrians

The Final EIR found that the original project would result in a *less-than-significant* impact on pedestrian conditions because it would not result in substantial overcrowding of sidewalks, create potentially hazardous conditions for pedestrians, or interfere with pedestrian accessibility to the site and adjoining areas.

Bicyclists

The Final EIR found that the original project would result in a *less-than-significant* impact because it would not create potentially hazardous conditions for bicyclists, or otherwise substantially interfere with bicyclist access, and would not substantially conflict with adopted policies, plans, or programs regarding bicycle facilities, or otherwise decrease the performance or safety of such facilities.

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[4] The SF-CHAMP model assumes less traffic due to the fact that, in a manual trip assignment, some trips are counted twice (i.e., a person counted as traveling from home in the analysis of a large project's residential component may also be counted as a person traveling to work in the analysis of the project's employment component). Therefore, while it is likely that the model-based analysis of 2040 conditions is more realistic, 2030 conditions were also reported in the Final EIR, to provide for full disclosure.

Loading

The Final EIR found that the original project's loading demand would be sufficiently accommodated through the combination of the designated off-street loading facilities and on-street loading zones to be provided throughout the original project site. Because the original project would have sufficient loading spaces on the original project site and its trash collection would not interfere with pedestrian and other traffic, the Final EIR concluded that the original project would result in a *less-than-significant* impact on loading conditions.

Emergency Access

The Final EIR found that the original project would not result in inadequate emergency access and effects on emergency access would be *less than significant*. With the implementation of the original project, access to the original project site would not be substantially different from existing conditions. Emergency vehicles would continue to use major access roads, such as Sunnydale Avenue, Santos Street, Brookdale Avenue, or Blythedale Avenue to access the original project site. The original project would reconfigure parts of Sunnydale Avenue, Brookdale Avenue, Blythedale Avenue and Santos Street, and would add new streets and driveways in between residential buildings within the site. All streets would be required to adhere to the *San Francisco Fire Code*. The project sponsor would ensure that all buildings and facilities are designed in accordance with the City standards to provide adequate emergency access.

Construction

The Final EIR concluded that the transportation impacts of constructing the original project would be *less than significant with mitigation* because, while construction could potentially result in intermittent degradation of intersection levels of service, result in delays to transit, interfere with pedestrian and bicycle accessibility to the site and adjoining areas, and/or disrupt emergency access, mitigation was identified. The impact would be reduced to a *less-than-significant* level with implementation of Mitigation Measure M-TR-6, Prepare Construction Traffic Control Plan.

Parking

The Final EIR noted that, under *California Public Resources Code* Section 21099(d), parking impacts of certain projects on infill sites within a transit priority area are not to be considered significant impacts under CEQA. Because the original project meets the criteria of Section 21099(d), the Final EIR did not consider the adequacy of parking in determining the significance of transportation impacts and found that the original project would not result in a substantial parking deficit that would create hazardous conditions or significant delays affecting traffic, transit, bicycles or pedestrians.

Evaluation of Proposed Modifications to the Original Project

Travel Demand

In the p.m. peak hour, the 70 dwelling units on Parcel Q would generate approximately 50 vehicle trips, about 40 transit trips, 1 additional pedestrian trip plus the 40 transit riders walking to a bus stop, and 3 additional bicycle trips. Daily vehicle trip generation would be approximately 250.

Traffic - VMT Analysis

CEQA Section 21099(b)(1) requires that the State Office of Planning and Research (OPR) develop revisions to the CEQA Guidelines establishing criteria for determining the significance of transportation

impacts of projects that "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." CEQA Section 21099(b)(2) states that upon certification of the revised guidelines for determining transportation impacts pursuant to Section 21099(b)(1), automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment under CEQA.

In January 2016, OPR published for public review and comment a Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA recommending that transportation impacts for projects be measured using a vehicle miles traveled (VMT) metric.[5] On March 3, 2016, in anticipation of the future certification of the revised CEQA Guidelines, the San Francisco Planning Commission adopted OPR's recommendation to use the VMT metric instead of automobile delay to evaluate the transportation impacts of projects (Resolution 19579). (Note: the VMT metric does not apply to the analysis of impacts on non-automobile modes of travel such as riding transit, walking, and bicycling.)

The original project EIR was completed prior to the Planning Commission adoption of the VMT metric in March 2016. At the time the original project EIR was completed, level of service (LOS) as defined by automobile delay was San Francisco's metric for determining transportation impacts. Given that LOS as defined by automobile delay has been replaced by VMT as the City's transportation impact metric, this addendum does not contain a discussion of automobile delay impacts. Instead, a VMT and induced automobile travel impact analysis is provided below. The topic of automobile delay, nonetheless, may be considered by decision-makers, independent of the environmental review process, as part of their decision to approve, modify, or disapprove the modified project. Because the original project was analyzed based on LOS, LOS-based mitigation measures from the EIR would apply to the modified project. '

Many factors affect travel behavior. These factors include density, diversity of land uses, design of the transportation network, access to regional destinations, distance to high-quality transit, development scale, demographics, and transportation demand management. Typically, low-density development at great distance from other land uses, located in areas with poor access to non-private vehicular modes of travel, generate more automobile travel compared to development located in urban areas, where a higher density, mix of land uses, and travel options other than private vehicles are available.

Given these travel behavior factors, San Francisco has a lower VMT ratio than the nine-county San Francisco Bay Area region. In addition, some areas of the City have lower VMT ratios than other areas of the City. These areas of the City can be expressed geographically through transportation analysis zones. Transportation analysis zones are used in transportation planning models for transportation analysis and other planning purposes. The zones vary in size from single city blocks in the downtown core, multiple blocks in outer neighborhoods, to even larger zones in historically industrial areas like the Hunters Point Shipyard.

The San Francisco County Transportation Authority (Transportation Authority) uses SF-CHAMP to estimate VMT by private automobiles and taxis for different land use types. Travel behavior in SF-CHAMP is calibrated based on observed behavior from the California Household Travel Survey 2010-

[5] This document is available online at: https://www.opr.ca.gov/s_sb743.php.

2012, Census data regarding automobile ownership rates and county-to-county worker flows, and observed vehicle counts and transit boardings. SF-CHAMP uses a synthetic population, which is a set of individual actors that represents the Bay Area's actual population, who make simulated travel decisions for a complete day. The Transportation Authority uses tour-based analysis for office and residential uses, which examines the entire chain of trips over the course of a day, not just trips to and from the project site. For retail uses, the Transportation Authority uses trip-based analysis, which counts VMT from individual trips to and from the project site (as opposed to entire chain of trips). A trip-based approach, as opposed to a tour-based approach, is necessary for retail projects because a tour is likely to consist of trips stopping in multiple locations, and the summarizing of tour VMT to each location would over-estimate VMT.[6,7]

For residential development, the regional average daily VMT per capita is 17.2.[8] For office and retail development, regional average daily work-related VMT per employee are 19.1 and 14.9, respectively. See Table 2, which includes the traffic analysis zones (TAZ) in which the original project site and Parcel Q are located.

A project would have a significant effect on the environment if it would cause substantial additional VMT. The OPR's Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA ("proposed transportation impact guidelines") recommends screening criteria to identify types, characteristics, or locations of projects that would not result in significant impacts to VMT. If a project meets screening criteria, then it is presumed that VMT impacts would be *less than significant* for the project and a detailed VMT analysis is not required.

TABLE 2
DAILY VEHICLE MILES TRAVELED

Land Use	Bay Area		Original Project			Parcel Q
	Regional Average	Regional Average minus 15%	TAZ 3	TAZ 7	TAZ 12	TAZ 5
Households (Residential)	17.2	14.6	10.7	11.1	11.1	11.1
Employment (Retail)	14.9	12.6	10.9	9.5	9.5	9.5

[6] To state another way: a tour-based assessment of VMT at a retail site would consider the VMT for all trips in the tour, for any tour with a stop at the retail site. If a single tour stops at two retail locations, for example, a coffee shop on the way to work and a restaurant on the way back home, then both retail locations would be allotted the total tour VMT. A trip-based approach allows us to apportion all retail-related VMT to retail sites without double-counting.

[7] San Francisco Planning Department, Executive Summary: Resolution Modifying Transportation Impact Analysis, Attachment F, Appendix A, March 3, 2016. Available on the internet at: http%3A%2F%2Fcommissions.sfplanning.org%2Fcpcpackets%2FAlign-CPC%2520exec%2520summary_20160303_Final.pdf&usg=AFQjCNGy5ZtkZvRG-62Ixoals3UIfz0OqQ

[8] Includes the VMT generated by the households in the development.

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

- Map-Based Screening for Residential, Office, and Retail Projects. OPR recommends mapping areas that exhibit where VMT is less than the applicable threshold for that land use. Accordingly, the Transportation Authority has developed maps depicting existing VMT levels in San Francisco for residential, office, and retail land uses based on the SF-CHAMP 2012 base-year model run. The Planning Department uses these maps and associated data to determine whether a proposed project is located in an area of the City that is below the VMT threshold. Development on Parcel Q would meet this screening threshold, as would the original project and the overall modified project.
- Small Projects – OPR recommends that lead agencies may generally assume that a project would not have significant VMT impacts if the project would either: (1) generate fewer trips than the level for studying consistency with the applicable congestion management program or (2) where the applicable congestion management program does not provide such a level, fewer than 100 vehicle trips per day. The Transportation Authority's Congestion Management Program, December 2015, does not include a trip threshold for studying consistency. Therefore, the Planning Department uses the 100 vehicle trip per day screening criterion as a level generally where projects would not generate a substantial increase in VMT.
- Proximity to Transit Stations. OPR recommends that residential, retail, and office projects, as well projects that are a mix of these uses, proposed within ½ mile of an existing major transit stop (as defined by CEQA Section 21064.3) or an existing stop along a high quality transit corridor (as defined by CEQA Section 21155) would not result in a substantial increase in VMT. However, this presumption would not apply if the project would: have a floor area ratio of less than 0.75; (2) include more parking for use by residents, customers, or employees of the project than required or allowed, without a conditional use; or (3) is inconsistent with the applicable Sustainable Communities Strategy.[9] Development on Parcel Q would meet this screening criteria, as would the original project and the overall modified project, because there are multiple bus lines (8-Bayshore/8-AX and –BX Bayshore Express and 9-San Bruno/9-R San Bruno Rapid) with sufficient peak-hour service frequency that the intersection of Sunnydale Avenue and Hahn Street is considered a major transit stop. Off-street parking would be provided on the Parcel Q site at a rate of 0.53 spaces per dwelling unit. Off-street parking on the entire project site with Parcel Q included would be provided at a rate of 0.83 spaces per dwelling unit. Therefore, the modified project would not exceed the parking requirement for the current RM-1 and NC-1 use districts, which is one space per dwelling unit.[10]

[9] A project is considered to be inconsistent with the Sustainable Communities Strategy if development is located outside of areas contemplated for development in the Sustainable Communities Strategy.

[10] San Francisco Planning Code, Sections and 209.2 and 710.94.

As shown in Table 2 above, existing average daily VMT per capita for residential uses in TAZ 5, 7, and 12 is 11.1 miles and 10.7 miles for TAZ 3. This is between 35.5 and 37.8 percent below the existing regional average daily VMT per capita of 17.2. Also, as shown in Table 2 above, existing average daily VMT per employee for retail uses in TAZ 5, 7, and 12 is 9.5 miles and 10.9 miles for TAZ 3. This is between 26.8 and 36.2 percent below the existing regional average daily VMT per capita of 14.9. Given the original project site and Parcel Q are located in an area where existing VMT is more than 15 percent below the existing regional average, the modified project's residential and retail uses (including development of Parcel Q) would not result in substantial additional VMT and impacts would be *less than significant*.

San Francisco 2040 cumulative conditions were projected using a SF-CHAMP model run, using the same methodology as outlined for existing conditions, but including residential and job growth estimates and reasonably foreseeable transportation investments through 2040. Projected 2040 average daily VMT per capita for residential uses in TAZ 5, 7, and 12 is 8.8 miles and 8.6 miles in TAZ 3 (see Table 3). This is

TABLE 3
DAILY VEHICLE MILES TRAVELED - 2040

Land Use	Bay Area		Original Project			Parcel Q
	Regional Average	Regional Average minus 15%	TAZ 3	TAZ 7	TAZ 12	TAZ 5
Households (Residential)	16.1	13.7	8.6	8.8	8.8	8.8
Employment (Retail)	14.6	12.4	10.1	9.1	9.1	9.0

between 45.3 and 46.6 percent below the projected 2040 regional average daily VMT per capita of 16.1.[11] Projected 2040 average daily VMT per employee for retail uses is 9.0 miles in TAZ 5, 9.1 miles in TAZs 7, and 12, and 10.1 miles in TAZ 3. This is between 30.8 and 38.3 percent below the projected 2040 regional average daily VMT per employee of 14.6.[12] Given the modified project site is located in an area where VMT is greater than 15 percent below the projected 2040 regional average, the modified project's residential uses, including the proposed use at Parcel Q would not result in substantial additional VMT. Therefore, the modified project's residential and retail uses would not contribute considerably to any substantial cumulative increase in VMT.

Transit

The original project would generate approximately 562 net new p.m. peak hour transit trips, of which 524 would be residential transit trips. The additional approximately 40 p.m. peak hour transit trips generated by the 70 residential units on Parcel Q would not cause a substantial increase in overall transit demand for the modified project because they would represent a relatively small (4 percent) increase in the total number of residential units, and an increase of about 7.5 percent in net new units, and would therefore not substantially increase capacity utilization on the various Muni lines serving Parcel Q. As noted in the Final EIR, none of the transit lines are, or would be with the original project, close to Muni's 85 percent capacity threshold at the various analysis "screenlines," and the additional ridership resulting from

[11] Ibid.

[12] Ibid.

development of Parcel Q would not change this conclusion. As such, the *less-than-significant* impacts described in the Final EIR with regard to increased transit delays, transit demand at Muni and regional transit screenlines, Maximum Load Point contributions on Route 9, Route 8BX, and T Third, would remain valid with the addition of the proposed development of Parcel Q.

Based on this information, the addition of the proposed development of Parcel Q to the original project would not result in any new significant impacts or substantially more severe impacts on transit than those identified for the original project.

Pedestrians

The original project would generate approximately 67 p.m. peak hour pedestrian trips, and an additional 562 p.m. peak hour walking trips to and from a transit stop. The additional 41 pedestrian trips generated by the 70 residential units on Parcel Q (including persons walking to and from transit stops) would not cause a substantial increase in overall pedestrian activity for the modified project because they represent only a marginal (4 percent) increase in the total number of residential units, and an increase of about 7.5 percent in net new units, and would therefore not substantially increase pedestrian activity. Moreover, with a single driveway and garage access point and new sidewalks that would tie into the existing pedestrian network, development on Parcel Q would present no substantial pedestrian conflicts. As such, the *less-than-significant* impacts described in the Final EIR with regard to sidewalk capacities, ADA compliance, intersection crossing safety, and the potential for pedestrian-vehicular conflicts would not substantially worsen with the addition of the proposed development of Parcel Q.

Based on this information, the addition of the proposed development of Parcel Q to the original project would not result in any new significant impacts or substantially more severe impacts on pedestrians than those identified for the original project.

Bicycles

As stated in the Final EIR, the original project would provide bicycle lanes on westbound Sunnydale Avenue west of Santos Street, and along both sides of Santos Street. The original project would also provide bicycle sharrows along the remaining portions of Sunnydale Avenue and along Brookdale and Blythedale Avenues.[13] These facilities would also serve the proposed development at Parcel Q. Because the existing bicycle volumes in the area were observed during preparation of the Final EIR to be relatively low, the proposed bicycle facilities would be sufficient to accommodate the new bicycle trips generated by the modified project.[14]

The original project would generate approximately 42 p.m. peak hour trips using "Other" modes (i.e., other than driving, taking transit, or walking). The majority of these trips would likely be made by bicycle. The approximately three additional p.m. peak hour bicycle trips generated by the 70 residential units proposed for Parcel Q would not cause a substantial increase in overall bicycle activity for the modified project because they would represent only a marginal (4 percent) increase in the total number of

[13] A sharrow is a street symbol that combines arrows and a bicycle and that indicates the path of travel for bicycles where no separate bicycle lane is provided.

[14] Field visits were conducted on Sunday, August 29, 2010, and on Thursday, September 23, 2010. Conditions at the site today are expected to be similar to conditions observed during site visits. No major capital projects that would substantially change the character of available bicycle facilities have occurred at the project site in the intervening time.

residential units, and an increase of about 7.5 percent in net new units, and would therefore not substantially increase bicycle activity. Bicycle trips would increase by the same percentages as the number of residential units.

The Parcel Q development, like most of the original project, would consist of a residential building over a ground-level parking podium. The Parcel Q building would include a single driveway for garage access and would have sidewalks that align with those on the Parcel Q block. There is Muni service (56-Rutland) on the Sunnydale Avenue frontage of Parcel Q but not on the Hahn Street frontage. Although detailed designs for the Parcel Q development are not available, preliminary feasibility studies anticipate garage access on Hahn Street, which would avoid conflicts with Muni buses, as well as with bicycles traveling to and from the original site on Sunnydale Avenue. The only Muni bus route on Sunnydale Avenue east of Hahn Street is the 56-Rutland, which runs every 30 minutes. The Parcel Q garage would generate less than one car trip per minute during the peak hour, which would not substantially conflict with transit service operation (i.e. substantial bus delay due to vehicles queuing to enter the garage would not occur), even if the garage entrance were to be located on Sunnydale Avenue instead of Hahn Street. (The original project would add bike lanes/shared bike-auto lanes on Sunnydale Avenue). As such, the *less-than-significant* impacts described in the Final EIR with regard to potential conflicts with bicyclists and other transportation activities such as parking, transit, and loading would remain valid with the addition of the proposed development of Parcel Q.

Based on this information, the addition of the proposed development of Parcel Q to the original project would not result in any new significant impacts or substantially more severe impacts related to bicycles than those identified for the original project.

Loading

Parcel Q, which would be comprised of approximately 88,550 square feet of residential use, would generate demand for .12 loading spaces during the average hour and .15 spaces during the peak loading hour. As indicated in the Final EIR, the original project without Parcel Q would generate demand for four loading spaces for the average hour and five spaces for the peak loading hour. The additional loading demand generated by the 70 residential units on Parcel Q would not cause an increase in the overall loading demand for the modified project that would change the number of loading spaces needed. As stated in the Final EIR, the original project would provide one off-street loading space as part of the mixed-use senior building, and the remaining loading activities would need to be accommodated in on-street loading spaces. The exact location of on-street loading zones would be determined based on the actual demand and needs for the project site in the future with collaboration with the SFMTA. It is expected that the move-in and move-out activities for residential uses would occur within the garages or from a nearby loading zone that could be created by SFMTA on either Hahn Street or Sunnydale Avenue.

The current plans for Parcel Q do not include building-specific design information. It is anticipated that the multi-family residential building would include a centralized area for collection of trash, recycling, and composting bins on the ground floor or outside the building at grade, and these bins would be rolled in and out for each pick-up through the proposed parking entry curb-cuts on either Hahn Street or Sunnydale Avenue.

Based on this information, the addition of the proposed development of Parcel Q to the original project would not result in any new significant impacts or substantially more severe impacts on loading than those identified for the original project.

Emergency Access

The building proposed to be developed on Parcel Q would be designed in accordance with *San Francisco Fire Code* standards that require provision of adequate emergency access. With the implementation of the modified project, access to the Parcel Q site would not be substantially different from the existing conditions. Emergency vehicles would continue to use Sunnydale Avenue or Hahn Street to access Parcel Q. These public streets adhere to the standards set forth in the *Fire Code* and would not be modified as part of the development of Parcel Q; streets reconstructed as part of the original project would be built according to *Fire Code* standards. Finally, the 4 percent additional residents compared to the original project would not substantially increase calls for service such that response times would be noticeably increased, nor would the development of Parcel Q impede movement of emergency vehicles. Therefore, the addition of the proposed development of Parcel Q to the original project would not result in any new significant impacts or substantially more severe impacts related to emergency access than those identified for the original project.

Construction

The Parcel Q site is currently vacant land, and thus development of Parcel Q would not require demolition of any existing structures. The Parcel Q building would be developed as part of Phase I of the original project, anticipated to begin construction in 2017. Development on Parcel Q would not include a basement; excavation would be required only for building foundations, as would be the case with residential buildings constructed on the original project site.

The addition of the proposed development of Parcel Q to the original project would not result in any new significant impacts or substantially more severe construction impacts on transportation than those identified in the Final EIR. As noted in the Final EIR, construction could potentially result in intermittent degradation of intersection levels of service, result in delays to transit, interfere with pedestrian and bicycle accessibility to the site and adjoining areas, and/or disrupt emergency access. However, the impact would be reduced to a *less-than-significant* level with implementation of Mitigation Measure M-TR-6, Prepare Construction Traffic Control Plan, which would also apply to the modified project, including development of Parcel Q.

Parking

As with the original project, development on Parcel Q would meet the criteria of Section 21099(d), and therefore parking is not considered a significant impact under CEQA. However, the following discussion is provided for informational purposes.

As stated previously, the proposed building on Parcel Q would include garage parking for 37 vehicles. The specific parking demand was not calculated for Parcel Q as the unit mix (e.g., studio, one bedroom, etc.), which is a key variable in the calculation of parking demand, has not yet been determined. Based on the number of proposed residential units, however, it can be determined that the minimum parking demand would be approximately 32 spaces (if all units are studios or one bedrooms) and the maximum would be approximately 64 spaces (if all units are two bedrooms). The original project without Parcel Q development would generate a total parking demand of about 1,810 spaces (1,699 long-term and 111

short-term parking spaces). A comparison of supply versus demand indicates there would be a surplus of approximately 127 on-street parking spaces and the original project would provide an adequate supply of parking to accommodate the anticipated demand.

The additional parking demand generated by the 70 residential units on Parcel Q would not cause a substantial increase in the overall parking demand for the modified project because this would represent only a marginal increase in the total parking demand, compared to that of the original project. Additionally, Parcel Q would contain 37 off-street parking spaces and is served by public transit and bicycle facilities. Therefore, development of Parcel Q would not result in a substantial parking deficit and would not materially affect the overall parking conditions in the project vicinity such that hazardous conditions or conflicts with other transportation modes would be created.

As described above, FEIR Mitigation Measure M-TR-6, Prepare Construction Traffic Control Plan, would be applicable to the modified project, including development of Parcel Q. Additionally, for cumulative impacts, Mitigation Measure M-CC-TR-1a, Monitoring of the intersection of Sunnydale Avenue and Schwerin Street would be applicable to the modified project. Mitigation Measures M-CC-TR-1b (Geneva Avenue and Santos Street) and M-CC-TR-1c (Geneva Avenue and Schwerin Street) were determined in the Final EIR to be infeasible.

Noise

Final EIR Conclusions for the Original Project

As indicated in the Final EIR for the original project, construction activities of up to 91 dBA at 50 feet could result in a substantial temporary increase in ambient noise levels in the original project vicinity above existing conditions, which were monitored to be 64 to 74 dBA during daytime hours. Consequently, Mitigation Measure M-NO-1a was identified to reduce construction noise levels as reasonably feasible. Because construction activities would occur during the daytime and involve standard construction equipment, implementation of the noise-reducing measures in Mitigation Measure M-NO-1a, Construction Specifications to Reduce Noise Levels During Construction, would be sufficient to reduce this impact to *less than significant with mitigation*.

The Final EIR presented modeled noise levels according to the HUD Day/Night Noise Level (DNL) Calculator, and evaluated noise levels on Sunnydale Avenue and Santos Street on the original project site. Modeling indicated that the original project would not increase 24-hour noise levels on either street, and cumulative noise levels would increase only incrementally, with the resulting change not likely to be perceptible.

The impact of overall traffic noise levels on residences would be *less than significant with mitigation* because, while the original project would exacerbate traffic noise that modeling indicates exceeds *San Francisco General Plan* standards, this impact would be reduced to a *less-than-significant* level with implementation of Mitigation Measures M-NO-1a, Noise Reduction Building Strategies, M-NO-1b, Noise Reduction Building Strategies for Residential Uses, and M-NO-1c, Noise Minimization for Residential Open Space.

Vibration caused during construction and experienced during operation of the original project would be *less than significant* because a) none of the construction activities associated with propagation of ground-borne vibration (e.g., pile driving, blasting, use of hoe-rams for demolishing large concrete structures, and caisson drilling) would be needed to construct the original project; and b) the residential uses of the

original project would not result in the generation of groundborne vibrations which are typically associated with rail operations in an urban setting. The original project site is located more than 1 mile from the nearest rail operations, and residential uses would not be affected by vibration from the rail. No other sources of vibration at the original project site have been identified.

Stationary noise generators (i.e., diesel generators and HVAC equipment) would be subject to Article 29 Section 2909 of the *San Francisco Police Code* which for residential properties, restricts the noise generation to 5 dBA above the ambient level at any point outside of the property plane of a residential use.

Evaluation of Proposed Modifications to the Original Project

The sensitive receptors nearest to the Parcel Q site are the residences surrounding the site, notably two residential buildings adjacent to the southern and eastern boundaries of Parcel Q. These buildings are located at a comparable distance from Parcel Q as the distance between the original project site and existing residences on the east side of Hahn Street between Sunnydale Avenue and Sunrise Way.

Operational Noise

Development of Parcel Q would generate incrementally more noise from vehicle use on adjacent and nearby roadways by residents of the additional 70 dwelling units; however, the increase would not perceptibly change traffic noise generated by the modified project, including Parcel Q, compared to traffic noise from the original project. Likewise, mechanical equipment that may be present on the Parcel Q building would not substantially increase operational noise, compared to that generated by the original project.

As stated above, the Final EIR found that the addition of traffic from the original project would not substantially increase traffic noise on local streets. The additional 50 p.m. peak-hour vehicle trips and 250 daily vehicle trips would not substantially increase traffic noise generated by the modified project, including Parcel Q, compared to the noise generated by the original project, and the change in noise levels, compared to those with the original project, would be well below 1 dBA and therefore would not be perceptible.

Title 24 of the *California Code of Regulations* (the *California Building Code*, adopted by the City as the *San Francisco Building Code*) establishes uniform noise insulation standards for residential projects. New residences must be designed to limit intruding noise to an interior community noise equivalent level (CNEL) (or day-night average sound level [DNL]) of at least 45 dBA. Moreover, pursuant to the Land Use Compatibility guidance for noise in the *San Francisco General Plan* Environmental Protection Element, new residential development in areas where, like the original project site and Parcel Q, the existing day-night noise level exceeds 60 dBA should only be undertaken after a detailed noise study is conducted. The Department of Building Inspection (DBI) would review the final building plans and any noise stud(ies) prepared for the modified project to ensure that the *Building Code* standards regarding sound transmission are met.

Construction Noise

Development of Parcel Q would also introduce short-term noise during the construction period of the new building. However, because construction would overlap with Phase I of the original project, the change in construction noise would not be substantial, and no new significant impact or substantially more severe noise impact would ensue. Construction of the Parcel Q component of the modified project

would not require demolition as the site is vacant. Parcel Q construction would consist of off-road equipment along with other construction-related noise sources including vehicle trips for deliveries and construction workers, and would be expected to affect surrounding receptors. Construction equipment would consist of concrete industrial saws, rubber tired dozers, tractors, loaders, backhoes, cranes, forklifts, cement and mortar mixers, pavers, rollers, and air compressors. The loudest of these pieces of equipment would be the concrete saw with a measured Lmax at 50 feet of 90 dBA but the construction subphase requiring this equipment would only last for about two days.

Building construction would by far be the longest subphase at 100 days with the loudest piece of equipment being the crane with a measured Lmax at 50 feet of 81 dBA. However use of this equipment would be intermittent as work progresses from one level to the next.

Construction activities would be required to comply with San Francisco Noise Ordinance (Article 29 of the *Police Code*). Section 2908 of the Ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m. The San Francisco Noise Ordinance limits noise levels from individual pieces of equipment to 80 dBA at a distance of 100 feet. Noise levels generated by construction of the proposed development on Parcel Q would have the potential to exceed these standards and nearby residential uses and would be considered a significant impact. Mitigation Measure M-NO-1a, identified in the Final EIR, would ensure that construction noise impacts remain *less than significant* for the modified project, including the development of Parcel Q.

Conclusion

Based on the information above, the addition of the proposed development of Parcel Q to the original project would not result in any new significant impacts or substantially more severe impacts related to noise than those identified for the original project, and no new mitigation measures would be required.

FEIR Mitigation Measure M-NO-1a, Construction Specifications to Reduce Noise Levels During Construction, would apply to development of Parcel Q. Mitigation Measure M-NO-1b, Noise Reduction Building Strategies for Residential Uses, would not be applicable because the *San Francisco Building Code* was amended after the Draft EIR was prepared to reinstate a maximum interior residential noise standard that was formerly included. Section 1207.6.2 states, "Interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room."[15] Therefore, interior noise levels for residential units of the modified project, including Parcel Q, would be required by law to not exceed a day-night noise level 45 dBA, which is the same standard established by Mitigation Measure M-NO-1b.

Air Quality

Final EIR Conclusions for the Original Project

As indicated in the Final EIR for the original project, construction of the original project would generate emissions of fugitive dust and criteria air pollutants. The project sponsor, through its contractors, would be required to implement dust control measures in compliance with the requirements of the Construction Dust Control Ordinance, which would ensure that the construction-related impacts due to fugitive dust would be *less than significant*.

[15] A habitable room is one used for living, sleeping, eating, or cooking.

The original project would be developed in three phases over a total period of 9 to 15 years. Because the first phase units would be occupied during construction of the second phase, and the units built in the first two phases would be occupied during construction of Phase 3, construction and operational emissions would overlap (unlike a typical project in which construction and operational emissions occur sequentially). Accordingly, the Final EIR evaluated these overlapping construction and operational emissions together against the City's significance thresholds for four periods: Phase 1 construction, Phase 1 operation plus Phase 2 construction, Phases 1 and 2 operation plus Phase 3 construction, and Phases 1, 2, and 3 operation (i.e., buildout).

Operation of the original project would include a variety of sources that would contribute to long term emissions of criteria air pollutants. These sources would include new vehicle trips, maintenance and operation of a standby diesel generator, natural gas combustion and area sources such as landscape equipment and use of consumer products. Estimated operational emissions at buildout of the original project would not exceed the daily or annual significance thresholds for the following criteria air pollutants: reactive Organic Gases (ROG), suspended particulate matter 10 microns or less diameter (PM_{10}), and suspended particulate matter 2.5 microns or less diameter ($PM_{2.5}$), nor would combined construction and operational emissions of ROG, PM_{10}, or $PM_{2.5}$ exceed the significance thresholds during any of the three construction periods. Emissions of nitrogen oxides (NOx), however, would exceed the applicable threshold during Phase 1 construction and the overlap between Phase 2 construction and Phase 1 operation. Implementation of Mitigation Measure M-AQ-1, Construction Emissions Minimization, would reduce NOx emissions and the resultant emissions would not exceed the applicable threshold, and the construction-related impact due to emissions of NOx would be *less than significant with mitigation*.

Construction and operation of the original project would generate emissions of toxic air contaminants, including diesel particulate matter (DPM). A project-specific health risk assessment conducted for the original project indicated that without mitigation, the original project would exceed the 100 cases per one million population significance threshold for increased lifetime cancer risk for the maximally exposed off-site receptors and would therefore result in a significant impact. The great majority (85 percent) of the increased cancer risk would result from DPM emitted by off-road construction vehicles and equipment, with the remaining risk attributable to background sources and to project operation (primarily routine testing of a backup diesel generator). However, with implementation of Mitigation Measure M-AQ-1, Construction Emissions Minimization, construction health risk would be reduced by nearly 95 percent, and impacts related to increased cancer risk would be reduced to *less than significant*. With mitigation, the resulting excess cancer risk impact at offsite sensitive receptors would be approximately 38 in one million and at on-site receptor locations would range between 47-49 per one million persons exposed. In contrast to cancer risk, the annual average concentrations of $PM_{2.5}$ would be below the significance threshold of 10 micrograms per cubic meter and would be *less than significant*. Therefore, the health risk impact would be *less than significant with mitigation* because construction and operation of the original project would generate toxic air contaminants, including DPM, which would expose sensitive receptors to substantial pollutant concentrations, but emissions would be reduced to a *less-than-significant* level through implementation of identified mitigation.

The original project would not conflict with, or obstruct implementation of the 2010 Clean Air Plan, and this impact would be *less than significant*.

During construction, diesel exhaust from construction equipment would generate some odors. However, construction-related odors would be temporary and would not persist upon project completion. Additionally, the original project is residential in nature with a small retail component (i.e., 16,200 square feet) and would not create a significant sources of new odors. Therefore, odor impacts would be *less than significant*.

Evaluation of Proposed Modifications to the Original Project

The addition of the proposed development of Parcel Q to the original project would include new construction and operation of an additional affordable multi-family housing building. The Parcel Q site is currently a vacant lot and would not require demolition of buildings. The site is approximately level and the proposed building would be built above grade, so excavation would be required only for building foundations, as would be the case with residential buildings constructed on the original project site. The modified project would result in short-term construction emissions as well as long-term operational emissions primarily from consumer products and vehicle use from the new residents.

The California Emissions Estimator Model (CalEEMod version 2013.2.2) was used to estimate operational-related emissions resulting from the addition of the proposed development of Parcel Q to determine if emissions of the modified project would exceed the applicable significance thresholds.

Additional operational emissions resulting from the proposed project modifications would result primarily from consumer product and vehicle use generated by residents. Results from CalEEMod indicate that maximum annual emissions from the operation of the proposed Parcel Q building at buildout would be well below the applicable significance thresholds, as was the case with the original project, reaching no more than 70 percent of any of the annual thresholds and 76 percent of any of the daily thresholds. Table 4, Mitigated Criteria Air Pollutant Emissions, shows the average daily and maximum annual emissions of the modified project, including development of Parcel Q.

Table 4. Mitigated Criteria Air Pollutant Emissions				
	Average Daily Emissions (lbs/day)			
	ROG	**NOx**	**PM_{10}**	**$PM_{2.5}$**
Phase 1 Construction	**25**	**35**	**0.4**	**0.3**
Parcel Q	6.25	8.75	0.1	0.075
Phase 1 Construction Total	**31.25**	**43.75**	**0.5**	**0.375**
	No	No	No	No
Phase 2 Construction	28	36	0.4	0.4
Phase 1 Operation	16	13	9.1	2.7
Parcel Q	3.25	1.68	0.007	0.007
Phase 2 Construction Period Total	**47.25**	**50.68**	**9.507**	**3.107**
	No	No	No	No
Phase 3 Construction	22	26	0.3	0.3
Phase 1 & 2 Operation	27	17	16	4.8
Parcel Q	3.25	1.68	0.007	0.007
Phase 3 Construction Period Total	**52.25**	**44.68**	**16.307**	**5.107**
	No	No	No	No
Threshold	54	54	82	54
Exceeds threshold?	No	No	No	No
	Maximum Annual Emissions (tons/year)			
	ROG	**NOx**	**PM_{10}**	**$PM_{2.5}$**
Phase 1 Construction	4.6	6.6	0.1	0.1
Parcel Q	1.15	1.65	0.025	0.025
Phase 1 Construction Total	**5.75**	**8.25**	**0.125**	**0.125**
	No	No	No	No
Phase 2 Construction	5.1	6.6	0.1	0.1
Phase 1 Operation	2.6	2	1.4	0.4
Parcel Q	0.6	0.4	0.23	0.07
Phase 2 Construction Period Total	**8.3**	**9**	**1.73**	**0.57**
	No	No	No	No
Phase 3 Construction	4	4.8	0.1	0.1
Phase 1 & 2 Operation	4.6	2.6	2.5	0.7
Parcel Q	0.6	0.4	0.23	0.07
Phase 3 Construction Period Total	**9.2**	**7.8**	**2.83**	**0.87**
	No	No	No	No
Threshold	10	10	15	10
Exceeds threshold?	No	No	No	No
SOURCE: ENVIRON and ESA, 2014\; ESA, 2016				

When operational emission are combined with construction emissions—assuming that development of Parcel Q would be part of Phase I of the overall modified project—as described above with respect to the analysis of the original project's phased development, the modified project, including development of Parcel Q, would result in NOx emissions in excess of the significance thresholds during Phase 1 construction and the overlap between Phase 2 construction and Phase 1 operation, as with the original project. The modified project would also exceed the significance threshold for ROG emissions during Phase 3 construction, which would include operational emissions from Phases 1 and 2. However, as with the original project, implementation of Mitigation Measure M-AQ-1 Construction Emissions Minimization, would reduce construction emissions sufficiently such that all combined criteria pollutant emissions across all phases would be below the significance thresholds, and emissions of criteria pollutants would be *less than significant with mitigation*, as with the original project.

With respect to health risk, as described above, the great majority of increased cancer risk from the original project would be attributable to diesel-powered construction equipment. Assuming a proportional increase in construction risk due to the approximately 4 percent additional residential units that would be developed under the modified project, and acknowledging that the closest sensitive receptors to the modified project site are located at a comparable distance from Parcel Q as the distance between the original project site and existing residences on the east side of Hahn Street between Sunnydale Avenue and Sunrise Way, the increased cancer risk would still be well below the 100 in one million significance threshold, when reduced through implementation of Mitigation Measure M-AQ-1, Construction Emissions Minimization, and therefore would be *less than significant*. This measure would be applicable to the modified project. As with the original project, health risk from $PM_{2.5}$ would be *less than significant* under the modified project.

The City's Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) requires a number of measures to control fugitive dust to ensure that construction projects do not result in visible dust. The Best Management Practices (BMPs) employed in compliance with the City's Construction Dust Control Ordinance would be effective in controlling construction-related fugitive dust such that no significant impacts would result. This ordinance would apply to the modified project, with the addition of the proposed development of Parcel Q, and would likewise avoid any significant impacts related to construction dust.

There is no building currently on the Parcel Q site, therefore, construction activities associated with the proposed project modifications would not result in a release of asbestos containing materials or lead based paint.

Based on this information, the addition of the proposed development of Parcel Q to the original project would not result in any new significant impacts or substantially more severe impacts on air quality than those identified for the original project, and no new mitigation measures would be required.

As described above, FEIR Mitigation Measure M-AQ-1, Construction Emissions Minimization, would be applicable to the modified project, including development of Parcel Q.

Shadow

Final EIR Conclusions for the Original Project

As indicated in the Final EIR for the original project, new shadow during all four seasons would be of limited duration and primarily fall on wooded areas of Herz Playground and Gleneagles Golf Course.

The existing active recreational uses would not be shaded by the original project for most of the year. The net new shadow would not be expected to adversely affect these elements because it would be of limited duration. Shadow would not substantially affect the use of these recreational facilities.

Shadow would also be cast within the original project site. Given the site's existing low-density development—as well as the residential buildings' locations and orientations away from streets and sidewalks—the existing Sunnydale and Velasco buildings do not cast substantial shadow on public rights of way. The increased height, bulk, and overall development density of the original project as compared to existing conditions would increase overall shadow. This new shadow would be most noticeable in the late fall and early winter, as well as early morning and late afternoon year round, when the sun is lowest in the sky. It would be of an extent and duration typical of shadow in other moderate-density built-out urban neighborhoods.

The Final EIR concluded that shadow cast by the original project would not substantially affect the use of outdoor recreation facilities adjacent to the original project site. Project-generated shadow would be typical of moderate-density San Francisco neighborhoods outside of the downtown skyscraper core. Accordingly, shadow effects of the original project were found to be *less than significant*.

Evaluation of Proposed Modifications to the Original Project

Similar to the analysis performed for the Final EIR for the original project, potential shadow impacts were evaluated for the building proposed on Parcel Q. A shadow fan analysis was conducted for a building with a height of up to 81 feet (including an allowance for mechanical/stairwell rooftop elements).[16] The shadow fan analysis shows that the proposed development of Parcel Q would not result in any shadow on nearby Herz Playground, Gleneagles Golf Course or other areas of McLaren Park, or any other parks subject to Section 295 of the *Planning Code* or other recreational facilities. Development on Parcel Q would result in shadow on surrounding streets and sidewalks, but not in a manner beyond what is common and generally accepted in an urban area. Therefore, new shadow resulting from development on Parcel Q would be *less than significant*. Therefore, the addition of the proposed development of Parcel Q to the original project would not result in any new significant impacts or substantially more severe impacts related to shadow than those identified for the original project, and no new mitigation measures would be required.

Biological Resources

Final EIR Conclusions for the Original Project

The Final EIR found that the original project could have a significant effect on special-status species because the original project would involve removal of trees that could potentially be used for nesting by a variety of birds—as well as demolition of buildings that are vacant, or not occupied—that may be used for roosting by special-status bats. Mortality of special-status birds or bats as a result of such construction activities would be considered a significant impact. This would include mortality of white-tailed kite, which is a California Fully Protected species observed on the original project site. Additionally, tree removal resulting in impacts to active nests or mortality of migratory birds would violate the federal Migratory Bird Treaty Act and/or the *California Fish and Game Code*, Sections 3500-3516. In addition, critical habitat for Franciscan manzanita, a federally endangered shrub historically found in serpentine

[16] San Francisco Planning Department, "Preliminary Shadow Fan Analysis – Sunnydale Block Q," February 3, 2016.

soils, bedrock outcrops, greenstone, and mixed Franciscan rock, is located west of, and outside of, the original project site and the original project would not impact this proposed critical habitat. No other listed or proposed endangered or threatened species or critical habitats have potential to occur within the original project site or have potential to be adversely affected by construction. Implementation of Mitigation Measure M-BI-1a, Protection of Special Status Bat Species, and Mitigation Measure M-BI-1b, Protection of Nesting Birds, would ensure that the original project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations. All other effects on biological resources (effects on riparian habitat or other sensitive natural communities; effects on wetlands; effects on wildlife movement); effects on locally important resources, effects to habitat conservation plans) were determined to be *less than significant* or *no impact*.

Evaluation of Proposed Modifications to the Original Project

Development of Parcel Q would not adversely affect biological resources, as the undeveloped site supports only common weedy vegetation. Effects of the modified project, including Parcel Q, would be *less than significant with mitigation*, as with the original project, with implementation of mitigation measures (Mitigation Measure M-BI-1a, Protection of Special Status Bat Species; and Mitigation Measure M-BI-1b, Protection of Nesting Birds, which would remain applicable to the modified project with the addition of the proposed development of Parcel Q). As with the original project, development on Parcel Q would be subject to the City's *Standards for Bird-Safe Buildings*. Other effects of the modified project with respect to biological resources would be *less than significant* or *no impact*, as with the original project.

Hazards and Hazardous Materials

Final EIR Conclusions for the Original Project

The Final EIR found that demolition and construction could cause or create a hazard through routine transport, use, disposal, handling, or emission of, or accident/upset conditions with respect to, hazardous materials, including contaminated soil and groundwater and hazardous building materials (e.g., asbestos, lead-based paint, and polychlorinated biphenyls [PCBs]). However, handling of asbestos and lead paint is heavily regulated by state and local codes, which would preclude a significant effect with respect to these substances. Mitigation Measure M-HZ-1, Hazardous Building Materials, would require that the presence of other hazardous building materials be evaluated prior to demolition and, if such materials were present, require that they be properly handled during removal and building demolition. This would reduce the potential impacts of these hazardous materials to a *less-than-significant* level. With respect to potential subsurface contamination, Mitigation Measure M-HZ-2, Site Mitigation Plan and Radon Survey, would ensure that construction activities would be able to respond to potential contamination, if encountered, and would reduce potential exposure impacts to *less than significant* levels. Other effects (hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of a school; location on a hazardous materials site; effects on emergency/evacuation plans; and exposure of people or structures to significant risk of loss, injury or death involving fires) were determined to be *less than significant* with respect to the original project.

Evaluation of Proposed Modifications to the Original Project

As with geology and soils and hydrology and water quality, subsurface soil and groundwater conditions, including any existing contamination, are similar beneath Parcel Q to conditions at the original project site. There are no additional sources of contamination that could affect Parcel Q. Therefore, effects related to hazardous materials would, as with the original project, be *less than significant* with applicable mitigation (Mitigation Measure M-HZ-2: Site Mitigation Plan and Radon Survey). (Mitigation Measure M-HZ-1, related to hazardous building materials, would not apply to Parcel Q, as there are no buildings on this site.) Other effects of the modified project with respect to hazardous materials would be *less than significant*, as with the original project.

MITIGATION MEASURES

Mitigation Measures identified in the Final EIR would continue to apply to the modified project (original project plus development of Parcel Q). However, the following mitigation measures from the Final EIR would be applicable Parcel Q.

Mitigation Measure M-CP-2: Archeological Testing Program.

An Archeological Testing Program shall be developed to ascertain whether archeological material may be preserved underneath recent fill within the project C-APE. This effort shall entail geoarcheological coring of the eastern-most portion of the project C-APE—in project blocks 1 through 8 east of Santos Street—and shall take place after detailed project design plans have been developed that show the full extent and depth of project construction activity. Additional pre-field investigations into the cut and fill history of the project C-APE should also be undertaken. With these additional data sets, the precise placement and depth of cores can be determined in order to ensure testing coverage is sufficient to identify any unknown archeological material that would be impacted by construction activities.

Based on a reasonable presumption that archeological resources may be present within the project area, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried archeological resources. The project sponsor shall retain the services of an archaeological consultant qualified in geoarcheology from the rotational Department Qualified Archaeological Consultants List (QACL) maintained by the Planning Department archaeologist. The project sponsor shall contact the Department archeologist to obtain the names and contact information for the next three archeological consultants on the QACL. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the ERO. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Section 15064.5 (a)(c).

Consultation with Descendant Communities. On discovery of an archeological site[17] an appropriate representative[18] of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to consult with the ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Final Archeological Resources Report shall be provided to the representative of the descendant group.

Archeological Testing Plan. The archeological consultant shall prepare and submit to the ERO for review and approval an archeological testing plan (ATP). The archeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, the testing method to be used, and the locations recommended for testing. The purpose of the archeological testing program shall be to determine to the extent possible the presence or absence of archeological resources and to identify and evaluate whether any archeological resource encountered on the site constitutes an historical resource under CEQA.

At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the ERO. If based on the archeological testing program the archeological consultant finds that significant archeological resources may be present, the ERO in consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or an archeological data recovery program. If the ERO determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

A) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or

B) A data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

Archeological Monitoring Program. If the ERO in consultation with the archeological consultant determines that an archeological monitoring program shall be implemented the archeological monitoring program shall minimally include the following provisions:

- The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils- disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles

[17] By the term "archeological site" is intended here to minimally include any archeological deposit, feature, burial, or evidence of burial.

[18] An "appropriate representative" of the descendant group is here defined to mean, in the case of Native Americans, any individual listed in the current Native American Contact List for the City and County of San Francisco maintained by the California Native American Heritage Commission.

(foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the risk these activities pose to potential archeological resources and to their depositional context;

- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;
- The archeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;
- The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archeological monitor has cause to believe that the pile driving activity may affect an archeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO.

Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO.

Archeological Data Recovery Program. The archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP shall identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.

The scope of the ADRP shall include the following elements:

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

Final Archeological Resources Report. The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/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.

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 Environmental Planning division of the Planning Department shall receive one bound, one unbound and one unlocked, searchable PDF copy on CD 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 in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

Mitigation Measure M-CP-3a: Paleontological Resources Mitigation Program.

Prior to ground disturbance, the project sponsor shall retain a qualified paleontologist (is a practicing scientist who is recognized in the paleontologic community and is proficient in vertebrate paleontology) or a California Professional Geologist with appropriate paleontological expertise to carry out all mitigation measures related to paleontological resources. The qualified paleontologist or geologist shall be available "on-call" to project sponsor throughout the duration of ground-disturbing activities.

Mitigation Measure M-CP-3b: Paleontological resources training.

All construction forepersons and field supervisors conducting or overseeing subsurface excavations shall be trained by a qualified paleontologist in the recognition of potential fossil materials prior to ground disturbing activities. A one hour pre-construction training on paleontological resources shall also be provided to all other construction workers, but may include videotape of the initial training and/or the

use of written materials rather than in person training by the qualified paleontologist. In addition to fossil recognition, the training shall convey procedures to follow in the event of a potential fossil discovery.

Mitigation Measure M-CP-3c: Assessment and salvage of potential fossil finds.

If potential fossils are discovered during construction, all earthwork or other types of ground disturbance in the immediate vicinity of the find shall stop until the qualified paleontologist can assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the fossil. If salvage is required, recommendations shall be consistent with current professional standards outlined in the Society of Vertebrate Paleontology, Assessment and Mitigation of Adverse Impacts to Nonrenewable Paleontologic Resources: Standard Guidelines. If required, treatment for fossil remains may include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection.

Mitigation Measure M-CP-3d: Monitoring by a qualified paleontologist during ground disturbing activities.

If fossils are discovered during construction, a qualified paleontologist shall determine whether monitoring shall be required during remaining ground disturbing activities. If required, a qualified paleontologist, a California Professional Geologist with appropriate paleontological expertise, or paleontological monitor working under the supervision of a qualified paleontologist shall monitor ground-disturbing activities. This monitoring shall consist of periodically inspecting disturbed, graded, and excavated surfaces, as well as soil stockpiles and disposal sites. The frequency of monitoring would be determined by the qualified paleontologist. If the monitor encounters a paleontological resource, he or she shall assess the fossil, and record or salvage it as described in M-CP-3c.

Mitigation Measure M-CP-4: Inadvertent Discovery of Human Remains.

The following measures shall be implemented in the event of the discovery, or anticipated discovery, of human remains and associated burial-related cultural materials:

> The treatment of human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activities shall comply with applicable state laws. This shall include immediate notification of the coroner of the county within which the project is located and, in the event of the coroner's determination that the human remains are Native American, notification of the California Native American Heritage Commission, which shall appoint a Most Likely Descendant (MLD) (PRC Section 5097.98). The archeological consultant, the project sponsor, ERO, and MLD shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of human remains and associated or unassociated funerary objects (CEQA Guidelines Section 15064.5[d]). The agreement shall take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. The PRC allows 48 hours to reach agreement on these matters. If the MLD and the other parties do not agree on the reburial method, the project sponsor shall follow Section 5097.98(b) of the PRC, which states that "the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance."

Mitigation Measure M-TR-6: Prepare Construction Traffic Control Plan.

The project sponsor shall implement the following measure:

To reduce potential delays and conflicts between construction activities and various modes of transportation, the project sponsor and its construction contractor(s) shall prepare a traffic control plan(s) for project construction. The project sponsor and construction contractor(s) shall meet with residents, neighbors, DPW, SFMTA, the Fire Department, SFUSD, Muni Operations, and other City agencies to coordinate feasible measures to reduce transportation conflicts and delays, including temporary transit stop relocations, transit service re-routing, adequate emergency access route(s), and other measures to reduce traffic and transit disruption, pedestrian and bicycle circulation effects, and interference with emergency access during construction of the proposed project. The contractor would be required to comply with the City and County of San Francisco's Regulations for Working in San Francisco Streets, which establish rules and permit requirements so that construction activities can be done safely while minimizing interference with pedestrians, bicyclists, transit, and vehicular traffic.

The coordinated plan shall include measures that address street closures, and ensure safe access to the McLaren Early Education School and all occupied residences. It shall also include, but may not be limited to, the following elements:

- Advisory signs shall be erected several weeks in advance to inform the public of planned street closures in the area. During each construction phase, street closure signs and detour routes shall be posted to direct vehicles to use alternative routes to access the project site.

- Emergency vehicle access shall be maintained to the school and all other occupied units and buildings at all times using the temporary streets, detour routes, and/or flagpersons.

- Construction staging and worker parking shall occur within the 48-acre Sunnydale-Velasco project site.

- The construction contractor shall coordinate with school administrators to ensure safe access to and from the school for students, teachers, and parents at all times. The contractors should inquire as to the school start and dismissal times and schedule construction vehicle trips outside of the peak school drop-off and pick up hours to the extent feasible. If avoiding these hours is infeasible, the construction contractor shall provide additional flaggers during school drop-off and pick-up hours near school.

To the extent applicable, the traffic control plan shall conform to Caltrans's Manual of Traffic Controls for Construction and Maintenance Work Zones.

Mitigation Measure M-CC-TR-1a: Upon completion of the proposed project, the SFMTA shall regularly monitor vehicular congestion. If LOS at Sunnydale Avenue and Schwerin Street degrades substantially to LOS E, and if consistent with the City's goals for a multi-modal transportation network, then the project sponsor shall work with SFMTA to add a left-turn pocket at the intersection of Sunnydale Avenue and Schwerin Street on the westbound approach. The project sponsor, or its successor(s), shall make a fair share contribution of funding for the improvement.

Mitigation Measure M-NO-1a: Construction Specifications to Reduce Noise Levels During Construction.

The project sponsor shall incorporate the following practices into the construction specifications documents to be implemented by the project contractor:

- Provide enclosures and mufflers for stationary equipment, shrouding or shielding for impact tools, and barriers around particularly noisy operations, such as grading or use of concrete saws within 50 feet of an occupied sensitive land use.
- Use construction equipment with lower (less than 70 dB) noise emission ratings whenever possible, particularly air compressors and generators.
- Do not use equipment on which sound-control devices provided by the manufacturer have been altered to reduce noise control.
- Locate stationary equipment, material stockpiles, and vehicle staging areas as far as practicable from sensitive receptors.
- Prohibit unnecessary idling of internal combustion engines.
- Require applicable construction-related vehicles and equipment to use designated truck routes to access the project site. Construction traffic should be routed along Geneva Avenue, Brookdale Avenue and Santos Street and should be managed to avoid peak periods.
- Implement noise attenuation measures to the extent feasible (i.e., such that they do not impede efficient operation of equipment or dramatically slow production rates), which may include, but are not limited to, noise barriers or noise blankets. The placement of such attenuation measures shall be reviewed and approved by the Director of Public Works prior to issuance of development permit for construction activities.
- Designate a Noise Disturbance Coordinator who shall be responsible for responding to complaints about noise during construction. The telephone number of the Noise Disturbance Coordinator shall be conspicuously posted at the construction site and shall be provided to the City. Copies of the construction schedule shall also be posted at nearby noise-sensitive areas.

Mitigation Measure M-AQ-1: Construction Emissions Minimization

A. *Construction Emissions Minimization Plan.* Prior to issuance of a construction permit, the project sponsor shall submit a Construction Emissions Minimization Plan (Plan) to the Environmental Review Officer (ERO) for review and approval by an Environmental Planning Air Quality Specialist. The Plan shall detail project compliance with the following requirements:

1. All off-road equipment greater than 25 hp and operating for more than 20 total hours over the entire duration of construction activities shall meet the following requirements:

   a) Where access to alternative sources of power are available, portable diesel engines shall be prohibited;

   b) All off-road equipment shall have:

      i. Engines that meet or exceed either U.S. Environmental Protection Agency (U.S. EPA) or California Air Resources Board (ARB) Tier 3 off-road emission standards, and

ii. Engines that are retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy (VDECS).[19]

c) Exceptions:

i. Exceptions to A(1)(a) may be granted if the project sponsor has submitted information providing evidence to the satisfaction of the ERO that an alternative source of power is limited or infeasible at the project site and that the requirements of this exception provision apply. Under this circumstance, the sponsor shall submit documentation of compliance with A(1)(b) for onsite power generation.

ii. Exceptions to A(1)(b)(ii) *may* be granted if the project sponsor has submitted information providing evidence to the satisfaction of the ERO that a particular piece of off-road equipment with an ARB Level 3 VDECS is: (1) technically not feasible, (2) would not produce desired emissions reductions due to expected operating modes, (3) installing the control device would create a safety hazard or impaired visibility for the operator, or (4) there is a compelling emergency need to use off-road equipment that are not retrofitted with an ARB Level 3 VDECS and the sponsor has submitted documentation to the ERO that the requirements of this exception provision apply. If granted an exception to A(1)(b)(ii), the project sponsor must comply with the requirements of A(1)(c)(iii).

iii. If an exception is granted pursuant to A(1)(c)(ii), the project sponsor shall provide the next cleanest piece of off-road equipment as provided by the step down schedules in **Table M-AQ-1-1** and shall provide documentation that emissions are sufficiently reduced to ensure criteria air pollutants, excess cancer risks and PM2.5 concentrations do not exceed significance criteria.

TABLE M-AQ-1-1
OFF-ROAD EQUIPMENT COMPLIANCE STEP-DOWN SCHEDULE

Compliance Alternative	Engine Emission Standard	Emissions Control
1	Tier 2	ARB Level 3 VDECS
2	Tier 2	ARB Level 2 VDECS
3	Tier 2	ARB Level 1 VDECS

How to use the table: If the requirements of (A)(1)(b) cannot be met, then the project sponsor would need to meet Compliance Alternative 1. Should the project sponsor not be able to supply off-road equipment meeting Compliance Alternative 1, then Compliance Alternative 2 would need to be met. Should the project sponsor not be able to supply off-road equipment meeting Compliance Alternative 2, then Compliance Alternative 3 would need to be met.

2. The project sponsor shall require the idling time for off-road and on-road equipment be limited to no more than two minutes, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment. Legible and visible signs shall be posted in multiple languages (English, Spanish, Chinese) in designated queuing areas and at the construction site to remind operators of the two minute idling limit.

[19] Equipment with engines meeting Tier 4 Interim or Tier 4 Final emission standards automatically meet this requirement, therefore a VDECS would not be required.

3. The project sponsor shall require that construction operators properly maintain and tune equipment in accordance with manufacturer specifications.

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

5. The Plan shall be kept on-site and available for review by any persons requesting it and a legible sign shall be posted at the perimeter of the construction site indicating to the public the basic requirements of the Plan and a way to request a copy of the Plan. The project sponsor shall provide copies of Plan to members of the public as requested.

B. *Reporting.* Quarterly reports shall be submitted to the ERO indicating the construction phase and off-road equipment information used during each phase including the information required in A(4). In addition, for off-road equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used.

Within six months of the completion of construction activities, the project sponsor shall submit to the ERO a final report summarizing construction activities. The final report shall indicate the start and end dates and duration of each construction phase. For each phase, the report shall include detailed information required in A(4). In addition, for off-road equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used.

C. *Certification Statement and On-site Requirements.* Prior to the commencement of construction activities, the project sponsor must certify (1) compliance with the Plan, and (2) all applicable requirements of the Plan have been incorporated into contract specifications.

Mitigation Measure M-BI-1a: Protection of Special Status Bat Species:

The project sponsor shall implement the following measures:

- Prior to construction or demolition activities within 250 feet of trees/structures with at least a moderate potential to support special-status bats, a qualified biologist (i.e., a biologist holding a CDFW collection permit and a Memorandum of Understanding with CDFW allowing the biologist to handle and collect bats) shall survey for bats. If no evidence of bats (i.e., visual or acoustic detection, guano, staining, strong odors) is present, no further mitigation is required.

- If special-status bats raising pups (also called a maternity colony) are identified within 250 feet of the project area during preconstruction surveys or project construction (typically, maternity colonies are active April 15th through August 15th), the project sponsor shall create a no-disturbance buffer acceptable in size to CDFW around the bat roosts. Bat roosts initiated within 250 feet of the project area after construction has already begun are presumed to be unaffected by project-related disturbance, and no buffer would be necessary. However, the "take" of individuals (e.g., direct mortality of individuals, or destruction of roosts while bats are present) is prohibited.

- Trees or buildings with evidence of special-status bat activity shall be removed during the time that is least likely to affect bats as determined by a qualified bat biologist (in general, roosts should not be removed if maternity bat roosts are present, typically April 15th through August 15th, and roosts should not be removed if present bats are in torpor, typically when temperatures are less than 40 degrees Fahrenheit). Non-maternity bat roosts shall be removed by a qualified biologist, by either making the roost unsuitable for bats by opening the roost area to allow airflow through the cavity, or excluding the bats using one-way doors, funnels, or flaps.

- All special-status bat roosts that are destroyed shall be replaced at a 1:1 ratio with a roost suitable for the displaced species. The type of created roosting habitat would be reflective of the habitat preference of the displaced species and would be determined by the bat biologist. An example would be bat boxes for colonial roosters. The roost shall be modified as necessary to provide a suitable roosting environment for the target bat species.

Mitigation Measure M-BI-1b: Protection of Nesting Birds:

The project sponsor shall implement the following:

- Preconstruction bird surveys shall be conducted by a qualified biologist during the breeding season (breeding season is defined as February 1st through August 15th) if tree removal or building demolition is scheduled to take place during the breeding season.
- For raptors, a preconstruction survey for nests and nesting birds shall be conducted within 2 weeks prior to initiation of construction activities if work shall occur during the breeding season. A qualified biologist shall survey all potential nesting sites in the construction limits and within 300 feet and in line of sight of the construction limits. If active nests are located, work shall not occur within 300 feet of the nest until an appropriate buffer zone has been established in coordination with the appropriate agencies (i.e., USFWS and/or CDFW).
- For other nesting birds protected by the Migratory Bird Treaty Act, a pre-construction survey for active nests shall be conducted by a qualified biologist no more than 2 weeks before construction if work shall occur during the breeding season. The survey shall be conducted within 100 feet of the work areas. If construction would affect the nest, then work shall not occur within 100 feet of the nest until a qualified biologist, in coordination with the appropriate agencies, has established an appropriate buffer zone.
- Special-status birds that establish nests during the construction period are considered habituated to such activity and no buffer shall be required, except as needed to avoid direct destruction of the nest, which would still be prohibited.
- Outside of the breeding season (August 16th through January 31st), or after young birds have fledged, as determined by the biologist, work activities may proceed.

Mitigation Measure M-HZ-2: Site Mitigation Plan and Radon Survey

The project sponsor shall retain a qualified environmental consulting firm to prepare a Site Mitigation Plan (SMP) to address the possible discovery of unexpected contaminants during construction. The SMP shall specify procedures to follow upon discovery of suspect soils and include appropriate notification, handling, and disposal protocols. The SMP shall also include contingency response actions, worker health and safety protocols, stormwater protection measures, dust mitigation in accordance with *San Francisco Health Code* Article 22B, and noise control in accordance with San Francisco Noise Ordinance.

The project sponsor shall also prepare work plan describing procedures for the completion of a radon soil vapor survey to be conducted prior to construction.

The SMP and radon soil survey work plan shall be submitted to the San Francisco Department of Public Health for review and approval prior to commencement of construction activities.

CONCLUSION

Based on the foregoing, it is concluded that the analyses conducted and the conclusions reached in the Final EIR certified on July 9, 2015, remain valid. The proposed modification to the project would not cause new significant impacts not identified in the Final EIR, and no new mitigation measures or alternatives would be necessary to reduce significant impacts. No changes have occurred with respect to circumstances surrounding the proposed project that would cause significant environmental impacts to which the project would contribute considerably, and no new information has become available that shows that the project would cause significant environmental impacts. Therefore, no supplemental environmental review is required beyond this addendum.

Date of Determination:

June 16, 2016

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

Ruth Cayo, for

SARAH B. JONES
Environmental Review Officer

cc: Robin Zimbler, Sunnydale Development Co. LLC
Mat Snyder, Planner
Bulletin Board / Master Decision File
Distribution List