



SAN FRANCISCO PLANNING DEPARTMENT

Preliminary Mitigated Negative Declaration

Date: July 9, 2014
Case No.: **2012.0678E**
Project Title: **Mason and Turk Residential Mixed-Use Project**
Zoning: C-3-G (Downtown General Commercial) Use District
120-X Height and Bulk District
Block/Lot: 0340/002, 005, and 006
Lot Size: 14,220 square feet (combined three lots)
Project Sponsor: John Kevlin – (415) 567-9000
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PROJECT DESCRIPTION:

The project site at 19 – 25 Mason Street and Turk Street (no address listed) is located in the Downtown/Civic Center neighborhood and Uptown Tenderloin National Register Historic District. The 14,220-square-foot (sf) project site is within the block bounded by Eddy Street to the north, Mason Street to the east, Turk Street to the south, and Taylor Street to the west. The L-shaped project site is adjacent to the Hotel Metropolis and fronts both Mason Street and Turk Street and is one block north of Market Street and one block west of the Powell Street Muni/BART station. The project site is currently used as a fenced-in surface parking lot for 54 vehicles, serving the adjacent Hotel Metropolis. The proposed project would include removal of the existing surface parking lot, merger of the three parcels, and construction of a new 12-story, 120-foot-tall (131-to-140-foot tall with above-roof structures), 142,920 sf building. The new building would include 109 dwelling units at the second through twelfth floors, separate ground-floor retail spaces along both street frontages (2,400 sf), and at- and below-grade parking for 55 vehicles, one car-share space, 120 bicycles, and two service vehicles. The dwelling unit mix would be 65 one bedroom, and 44 two-bedroom units. The Hotel Metropolis would not be altered as part of the proposed project and would remain as a hotel use.

The proposed project would be subject to Downtown Project Authorization (Section 309 of the Planning Code) review process because the project site is located within a C-3 district, including exceptions for rear yard, ground-level wind currents, and accessory off-street parking. The Downtown Project Authorization is identified as the Approval Action for the whole of the proposed project. In addition, the proposed project would seek a variance for exposure (Section 140 of the Planning Code) and a Transfer of Development Rights to increase permitted floor area ratio from 6.0 to 1 to 7.9 to 1.0.

FINDING:

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

the following reasons as documented in the Initial Evaluation (Initial Study) for the project, which is attached.

Mitigation measures are included in this project to avoid potentially significant effects. See pages 105 – 116.

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INITIAL STUDY
19 MASON STREET/TURK STREET
PLANNING DEPARTMENT CASE NO. 2012.0678E

A. PROJECT DESCRIPTION

Project Location

The project site at 19 – 25 Mason Street and Turk Street (no address listed) is located in the Downtown/Civic Center neighborhood and Uptown Tenderloin National Register Historic District. The 14,220-square-foot (sf) project site (Assessors Block 340, Lots 002, 005, and 006) is within the block bounded by Eddy Street to the north, Mason Street to the east, Turk Street to the south, and Taylor Street to the west. The L-shaped project site is adjacent to the Hotel Metropolis and fronts both Mason Street and Turk Street and is one block north of Market Street and one block west of the Powell Street Muni/BART station (refer to Figure 1, Project Vicinity). The project site is within a Downtown General Commercial (C-3-G) Use District and a 120-X Height and Bulk District. The basic floor area ratio (FAR) allowed for the project site is 85,314 gross sf (gsf), which can be increased to 127,971 gsf through the Transfer of Development Rights.

Land uses in the surrounding area include a mixture of retail, entertainment, hotel, residential, and office uses. Land uses adjacent to the project site include a six-story single-room-occupancy residential building (Ambassador Hotel) above ground-floor commercial uses to the north, an eight-story office building above ground-floor commercial uses across Mason Street to the east, a nine-story hotel (Hotel Metropolis) to the southeast, a two-story commercial building across Turk Street to the south (with frontage on Market Street), and a seven-story single-room-occupancy residential building (Dalt Hotel) above ground-floor commercial uses to the west (refer to Figure 2, Surrounding Land Uses).

The project site is currently used as a fenced-in surface parking lot for 54 vehicles, serving the adjacent Hotel Metropolis. Vehicles access the project site from two 20-foot-wide curb cuts, one at Turk Street and one at Mason Street. No trees exist on or around the perimeter of the project site (refer to Figure 3, Existing Project Site).

Figure 1 Project Vicinity

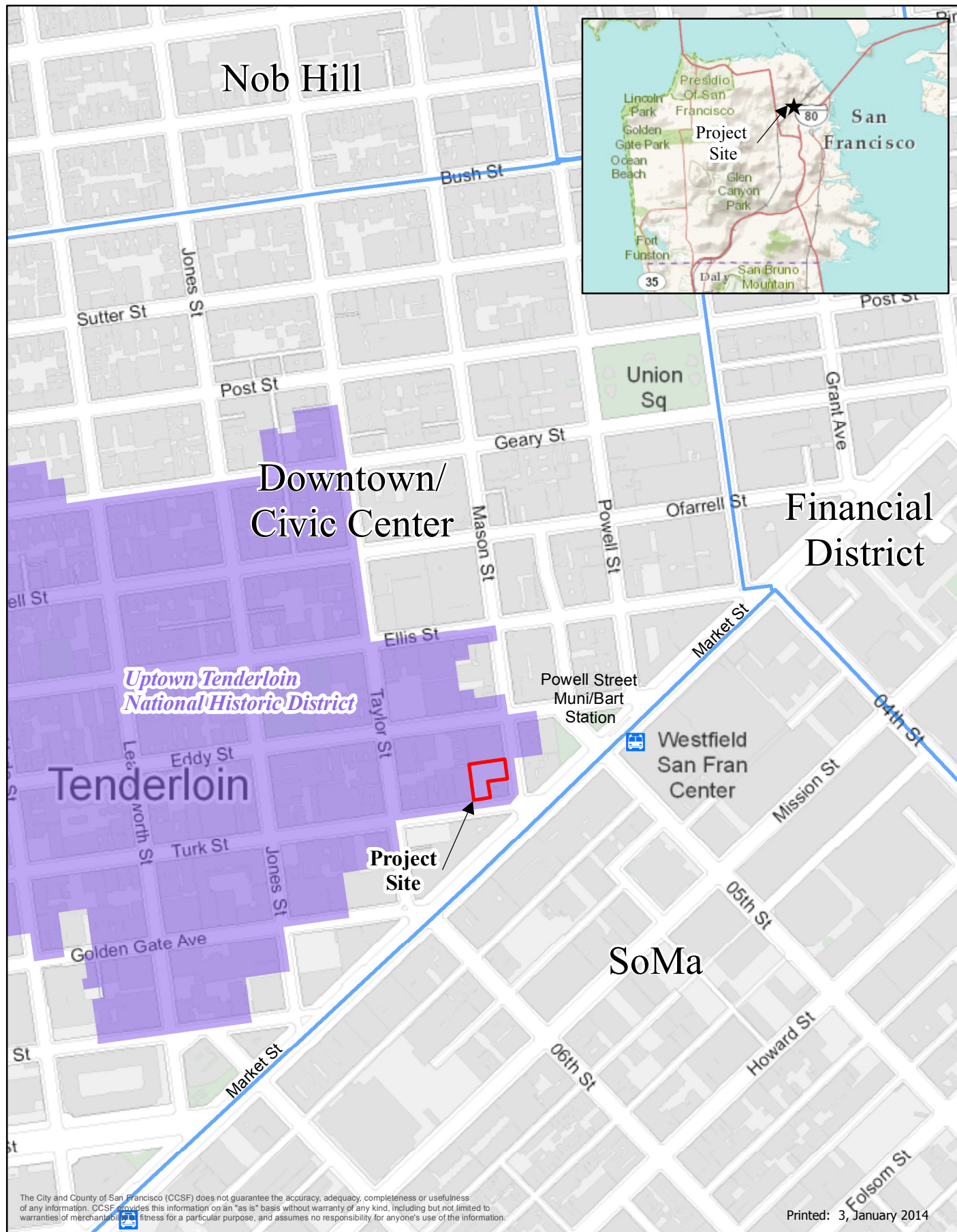
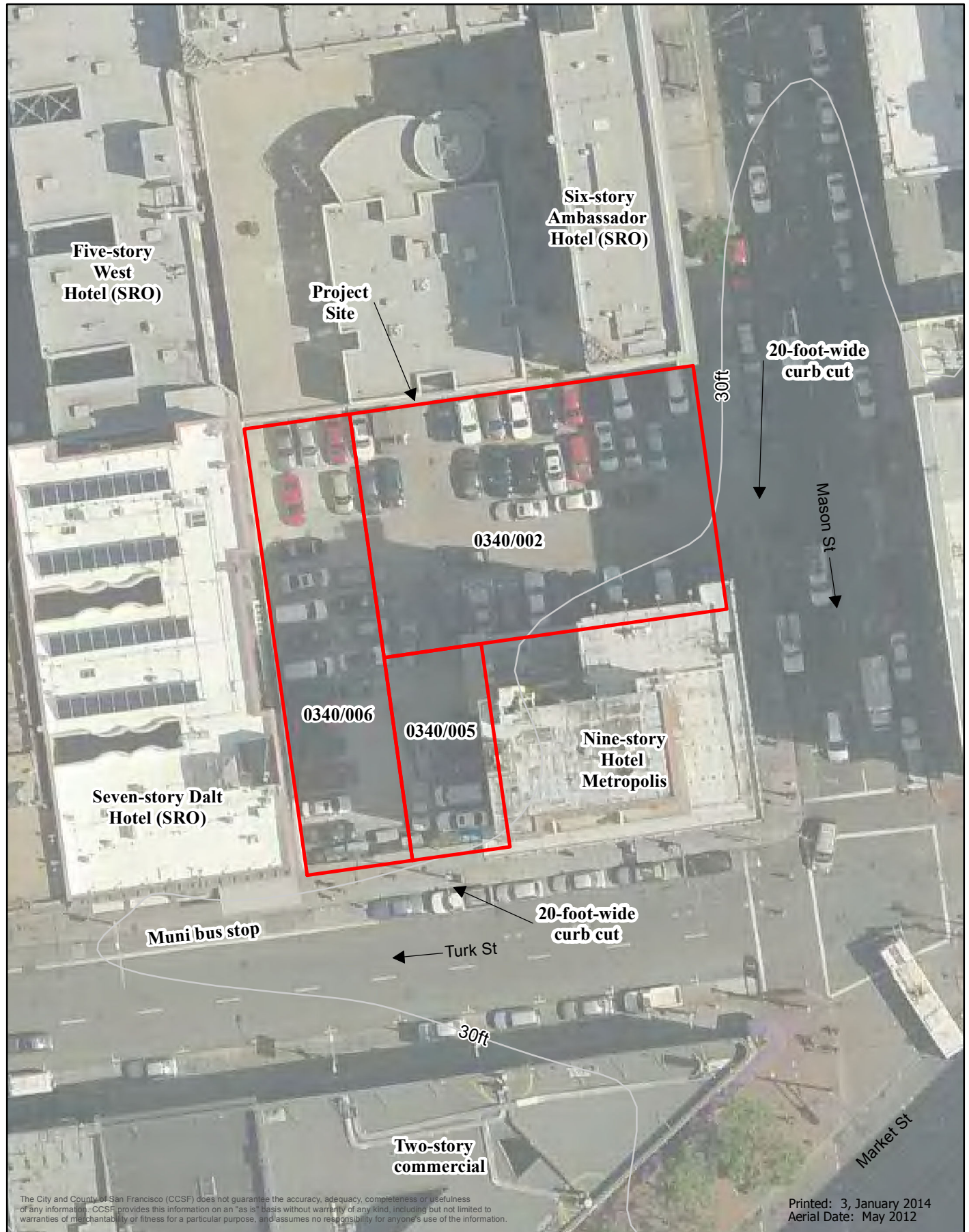


Figure 2 Surrounding Land Uses



Comments: SRO - Single-room-occupancy

Figure 3 Existing Project Site



Comments: SRO - Single-room-occupancy
XXXX/XXX - Block/Lot Number

Project Characteristics

The proposed project would include removal of the existing surface parking lot, merger of the three parcels, and construction of a new 12-story, 120-foot-tall (131-to-140-foot tall with above-roof structures), 142,920 sf (or 112,600 gsf) building. The new building would include 109 dwelling units at the second through twelfth floors, separate ground-floor retail spaces along both street frontages (2,400 sf),¹ and at- and below-grade parking for 55 vehicles, one car-share space, and two service vehicles (18,140 sf).² The dwelling unit mix would be 65 one bedroom, and 44 two-bedroom units. The residential lobby and entrance would be located adjacent to the northern side of the existing Hotel Metropolis. The Mason Street retail space, at 1,560 sf, would be located to the north of the new residential lobby. The Turk Street retail space, at 840 sf, would be located to the west of the new parking garage entrance. The parking garage would be accessed from a new 14-foot-eight-inch-wide curb cut at Turk Street, which is approximately 10 feet, nine inches east of an existing 120-foot-long Muni bus stop for the 16X – Noriega and 31 – Balboa. The new curb cut would reduce the length of an existing 86-foot-long passenger loading zone on Turk Street to 75 feet, three inches. At the ground floor, the parking garage would also include two service vehicle spaces and 120 bicycle parking spaces (refer to Figure 4 Proposed Ground-Floor Plan, Figure 5 Proposed Basement Plan, Figure 6 Proposed Representative Upper-Floor Plan, and Figure 7 Proposed Roof Plan).

The ground floor and basement would fill the entirety of the project site. Below ground surface (bgs) construction would include a reinforced mat foundation to a depth of approximately 18 feet bgs and an elevator pit to a depth of approximately 24 feet bgs. The excavation area would require the removal and disposal of 7,000 to 8,000 cubic yards of soil. At the northwest corner of the project site, the second through twelfth floors would be set back approximately 55 feet from the western adjacent buildings and approximately 65 feet from the northern adjacent buildings. On the second floor (podium level), the setback area would contain a 3,500-sf landscaped open space. An approximately 3,100-sf open space would also be provided on the roof, adjacent to the northern side of the existing Hotel Metropolis. The roof would also contain separate structures above 120 feet that may be visible from the public right-of-way. An 11-foot-tall mechanical penthouse would be set back approximately 11 feet from the Turk Street façade roofline. A 20-foot-tall elevator penthouse and 11-foot-tall mechanical penthouse would be set back approximately 29 feet and 23 feet, respectively from the Mason Street façade roofline (refer to Figure 8 South Elevation and Figure 9 East Elevation). A backup diesel generator would also be provided in a self-contained acoustic enclosure (approximately 8-feet-wide by 20-feet-long by 8-feet-tall) on the roof, west of the 11-foot-tall mechanical penthouse on the Turk Street façade. On the street frontages of the project site, the proposed project would include seven new trees and would fill in the existing curb cuts along Mason and Turk Streets.

¹ The ground floor retail spaces, both less than 5,000 square feet, are not factored into the gross square footage building calculations in accordance with Planning Code Section 102.9(b)(13).

² Various spaces (i.e., the parking garage, 18,140 sf; bicycle parking, 1,040 sf; and mechanical, storage, and circulation, 8,740 sf) are not factored into the gross square footage calculations in accordance with Planning Code Section 102.9(b).

Figure 4, Proposed Ground-Floor Plan



Comments: Not to Scale
Source: SB Architects, June 5, 2014.

The floor plan illustrates the second floor layout, featuring a central corridor and various utility and storage rooms. Key areas include:

- Utility Rooms:** Water Tank (485 SF), Fire Pump (336 SF), Electrical (228 SF), Transformer (360 SF), and a Boiler Room (134 SF).
- Staircases:** Stair 1 and Stair 2, both with 'UP' arrows.
- Lobby:** A central area with two elevators labeled 'ELEV 1' and 'ELEV 2'.
- Parking:** A large parking area with 36 spaces, labeled P1 through P36. A note indicates '(8) CLASS 2 BIKE PARKING SPACES IN DOUBLE ROWS GALVANIZED STEEL BIKE RACKS'.
- Access Points:** Multiple 'DEP ACCESS MECH STACKER' points are marked throughout the plan.
- Dimensions:** The overall building footprint is 137'-2 3/16" wide by 74'-8" deep. Individual room dimensions are also provided, such as 16'-0" for the Water Tank and 43'-2" for the Transformer area.
- Orientation:** The plan is oriented with 'TURK ST ABOVE' on the left and 'MASON ST. ABOVE' on the right.

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Figure 6, Proposed Representative Upper-Floor Plan



Comments: Not to Scale
Source: SB Architects, June 5, 2014.

Site plan for the proposed 10-story building at the intersection of Turk St. and Mason St. The plan shows the building footprint, setbacks, and surrounding context.

Building Footprint:

- Core: LOBBY (337 SF), ELEV 1, ELEV 2
- Wing 1: KITCH 1 (420 SF), MECH 1 (200 SF), STAIR 1 (233 SF)
- Wing 2: KITCH 2 (310 SF), MECH 2 (200 SF), STAIR 2 (140 SF)

Setbacks:

- Setback from Turk St. (68.75' ROW): 15'-0"
- Setback from Mason St. (69.06' ROW): 15'-0"

Surrounding Context:

- EXISTING 1-STORY BUILDING (NORTH)
- EXISTING 7-STORY BUILDING (WEST)
- COURT AT AMBASSADOR HOTEL (2-STORY PORTION) (NORTH)
- BALCONIES BELOW, 750 SF AT LVL 12 (WEST)
- RESERVED FOR FACADE MAINT. EGMT (EAST)

Other Features:

- 6' FENCE (Surrounding the building footprint)
- ROOF TERRACE 1 COMMON OPEN SPACE (MIN 1,680 SF) (SEE LANDSCAPE DRAWINGS)
- ROOF TERRACE 2 COMMON OPEN SPACE (MIN 1,380 SF) (SEE LANDSCAPE DRAWINGS)

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Architectural elevation drawing of a building facade. The drawing shows a multi-story building with a central section and two side sections. The central section has a modern design with large windows and a flat roof. The side sections have a more traditional design with multiple windows and a pitched roof. A height limit of 120'-0" is indicated on the right side of the drawing. The drawing includes level markers from the BASEMENT LEVEL to the ROOF LEVEL. A legend on the right side of the drawing defines the materials used for the storefront and awning.

South Elevation

± 82'-0"

Aluminum roll-up garage entry grille

BASEMENT LEVEL

LEVEL 1 (AT LOBBY)

FIRST RESIDENTIAL LEVEL

LEVEL 2

LEVEL 3

LEVEL 4

LEVEL 5

LEVEL 6

LEVEL 7

LEVEL 8

LEVEL 9

LEVEL 10

LEVEL 11

LEVEL 12

ROOF LEVEL

120'-0" HEIGHT LIMIT

+120'-0" HEIGHT LIMIT

+0'-0" BASE HEIGHT

1

2

3

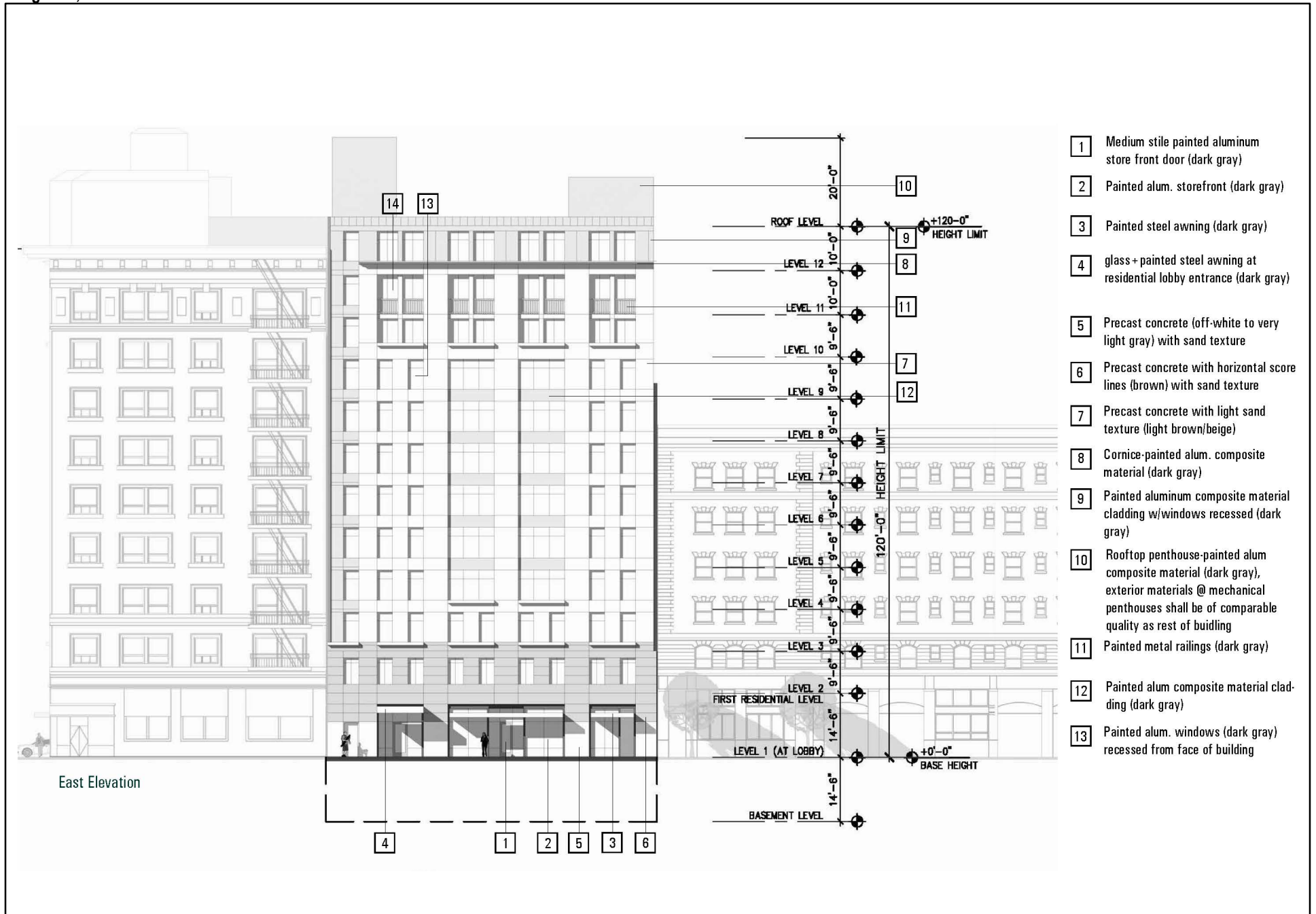
1 Medium stile painted aluminum store front door (dark gray)

2 Painted alum. storefront (dark gray)

3 Painted steel awning (dark gray)

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Figure 9, East Elevation



Comments: Not to Scale
Source: SB Architects, April 3, 2014.

Noise Measures

The proposed project would apply Sound Transmission Class 32 – 39 (depends on location and floor level) for all windows and exterior door assemblies facing Mason street and Turk Street to reduce noise. In addition, the proposed project would apply Sound Transmission Class 28 – 39 (depends on location and floor level) for all windows and exterior door assemblies facing the rear/side yard to reduce noise. Refer to Table 5 in Section E.5 Noise for further information.

Construction

Construction would last approximately 18 months with an anticipated date of occupancy in Summer, 2016. Diesel-generating equipment would be required for the proposed project during the initial and middle phases of construction for approximately 16 months. Construction phases would consist of bgs construction, superstructure, exterior wall construction and glazing, and building construction interior and finishes. The estimated construction cost is \$39,000,000.

Project Approvals

The proposed project would require the following approvals:

Planning Commission

- Downtown Project Authorization (Section 309 of the *Planning Code*), including exceptions for rear yard, ground-level wind currents, and accessory off-street parking. The Downtown Project Authorization is identified as the Approval Action for the whole of the proposed project.

Zoning Administrator

- Variance for exposure (Section 140 of the *Planning Code*).
- Transfer of Development Rights to increase permitted FAR from 6.0 to 1.0 gsf to 7.9 to 1.0 gsf.

San Francisco Department of Public Works

- Lot Merger.

San Francisco Department of Building Inspection

- Approval of a Building Permit.

San Francisco Municipal Transportation Agency

- Reduction of an existing passenger loading zone and any proposed curb or street modifications.

San Francisco Public Utilities Commission

- Approval of Erosion and Sediment Control Plan (Article 4.1 of the Public Works Code).
- Approval of Stormwater Control Plan (Article 4.2 of the Public Works Code).

- Approval of landscape and irrigation plans (Article 63 of the Administrative Code).

San Francisco Department of Public Health

- Certification for backup diesel generator (Article 30 of the Health Code).
- Approval of Enhanced Ventilation System (Article 38 of the Health Code).
- Approval of Site Mitigation Plan (Article 22A of the Health Code).

Bay Area Air Quality Management District

- Approval of permit to operate backup diesel generator.

B. PROJECT SETTING

The project site is within the Tenderloin neighborhood, which is part of the larger Downtown/Civic Center neighborhood, and near the South of Market Neighborhood, which is across Market Street one block south of the project site. The L-shaped project site is three lots (14,220 sf) consisting of a fenced-in surface parking lot for 54 vehicles, serving the adjacent Hotel Metropolis near the intersection of Turk Street and Mason Street. The topography of the project site and surrounding area is relatively flat. The project site is within the block bounded by one-way eastbound Eddy Street to the north, one-way southbound Mason Street to the east, one-way westbound Turk Street to the south, and one-way northbound Taylor Street to the west. In the vicinity of the project site, each of these roadways consists of two or three travel lanes.

The project site is within a Downtown General Commercial (C-3-G) Use District and a 120-X Height and Bulk District. Most of the properties along Market Street near the project site are within a similar Use District (e.g., C-3-R) and similar Height and Bulk District (110-X), with the exception of Hallidie Plaza (P Use District and OS Height and Bulk District), which is approximately 200 feet east of the project site. Properties adjacent to the project site to the west are also within the North of Market Residential Special Use District and Fringe Financial Service Restricted Use District. Both districts' purposes, among others, are to preserve the residential character and neighborhood-serving commercial uses of the neighborhood.

Land uses in the surrounding area include a mixture of retail, entertainment, hotel, residential, and office uses. Land uses adjacent to the project site include a six-story single-room-occupancy residential building (Ambassador Hotel) above ground-floor commercial uses to the north, an eight-story office building above ground-floor commercial uses across Mason Street to the east, a nine-story hotel (Hotel Metropolis) to the southeast, a two-story commercial building across Turk Street to the south (with frontage on Market Street), and a seven-story single-room-occupancy residential building (Dalt Hotel) above ground-floor commercial uses to the west.

The project site and most of the surrounding buildings are within the Uptown Tenderloin National Register Historic District (District). The District is a high-density residential area characterized by a variety of multiple-story commercial, residential, hotel, and institutional buildings dating from 1906 to the 1930s, with a few newer, non-contributory buildings. The character-defining features of the District include a building type with 3–7 stories, multi-unit apartment or hotel use, and façades of brick or reinforced concrete. Buildings rise continuously straight up from the sidewalk and occupy the entire width of the lots. Refer to Section E.4 Cultural and Paleontological Resources for a further description of this District.

C. COMPATIBILITY WITH EXISTING ZONING AND PLANS

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

San Francisco Planning Code

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

Uses

The project site is within a C-3-G Use District. This district covers the western portions of downtown and is composed of a variety of uses: retail, offices, hotels, entertainment, clubs and institutions, and high-density residential. The C-3-G Use District permits the maximum density ratio of one dwelling unit for each 125 sf of lot area. The project site is 14,220 square feet and the proposed project includes 109 dwelling units, which equates to one dwelling unit for each 130 sf of lot area. The C-3-G Use District permits retail business or personal service establishment, such as the retail space included in the proposed project. Therefore, the proposed project would be consistent the uses allowed in the C-3-G Use District.

Height and Bulk

The project site is located in a 120-X Height and Bulk District. The proposed new building would be 120 feet in height with a mechanical penthouse extending above the roof slab an additional 11 feet (131 feet in height) and a penthouse elevator extending above the roof slab an additional 20 feet (140 feet in height). Although these additional features would extend above 120 feet, these features are exempt per *Planning Code* Section 260(b). The "X" Bulk District does not have bulk limitations for sites at this Height District. Thus, the proposed project would comply with the 120-X Height and Bulk District limits.

Floor Area Ratio

The basic FAR allowed for the project site is 85,314 gsf, which can be increased to 127,971 gsf through the Transfer of Development Rights. The proposed project would consist of a new 112,600 gsf building, by seeking a Transfer of Development Rights to increase the FAR at the project site.

Exceptions to Section 309 Review

The proposed project would seek a Downtown Project Authorization (Section 309 of the *Planning Code*), including exceptions for rear yard (Section 134 of the *Planning Code*), ground-level wind currents (Section 148 of the *Planning Code*), and residential accessory parking (Section 151.1(f) of the *Planning Code*).

Planning Code Section 134 requires that any building containing a dwelling unit in a Downtown Commercial District must provide a rear yard equal to 25 percent of the total lot depth at all residential levels. The proposed project does not provide a rear yard that complies with this Code requirement, and as such, requires a rear yard exception under *Planning Code* Section 309. A 309 exception may be granted so long as the “building location and configuration assure adequate light and air to windows within the residential units and to the usable open space provided.”

Planning Code Section 148 requires that new construction in Downtown Commercial Districts will not cause ground-level wind currents to exceed pedestrian comfort levels. This standard requires that wind speeds not exceed 11 miles per hour in areas of substantial pedestrian use for more than 10 percent of the time year round, between 7:00 AM and 6:00 PM. The requirements of this Section apply either when preexisting ambient wind speeds at a site exceed the comfort level and are not being eliminated as a result of the project, or when the project may result in wind conditions exceeding the comfort criterion. Exceptions from the comfort criterion may be granted through the 309 process, but no exception may be granted where a project would cause wind speeds at the site to reach or exceed the hazard level of 26 mph for a single hour of the year. The existing conditions at the project site indicate that 19 of the 41 test points exceed the *Planning Code's* comfort criterion. A Section 309 exception is being sought because with the proposed project, 24 of the 45 test locations were found to meet or exceed the *Planning Code's* comfort criterion. Refer to Section E.8, Wind and Shadow, for further information about the analysis.

Planning Code Section 151.1 limits principally permitted residential parking in a Downtown Commercial Zoning District to up to one car per four units, which equates to 27 spaces. Parking up to .75 spaces (or 1 per unit, depending on the size of the unit) is permitted if the Planning Commission grants an exception through the 309 process. The proposed project is seeking 55 parking spaces, which is a ratio of .50 parking spaces per unit, therefore, a parking exception is required under *Planning Code* Section 309. A 309 exception may be granted so long as additional findings outlined in Section 151.1(f) can be made by the Planning Commission.

Variance

The proposed project is requesting a variance for exposure (Section 140 of the *Planning Code*). *Planning Code* Section 140 requires at least one room within every dwelling unit to face directly on an open area that is either (1) a public street or alley that is at least 25 feet in width, or a side yard or rear yard that meets the requirements of the *Planning Code*, or (2) an open area that is unobstructed and is no less than 25 feet in every horizontal dimension for the floor at which the dwelling unit in question is located and at the floor immediately above it, with an increase of five feet in every horizontal dimension at each subsequent floor. The proposed dwelling units that face onto Turk and Mason Streets comply with this requirement; however, the proposed

dwelling units that face toward the rear courtyard at the sixth floor and below do not comply with this requirement. A variance from Section 140 is being sought as part of this proposed project.

Plans and Policies

San Francisco General Plan

The *San Francisco General Plan (General Plan)*, which provides general policies and objectives to guide land use decisions, contains some policies that relate to physical environmental issues. The *General Plan* contains 10 elements (Commerce and Industry, Recreation and Open Space, Housing, Community Facilities, Urban Design, Environmental Protection, Transportation, Air Quality, Community Safety, and Arts) that set forth goals, policies and objectives for the physical development of the City. Any conflict between the proposed project and policies that relate to physical environmental issues are discussed in Section E, Evaluation of Environmental Effects. The compatibility of the proposed project with *General Plan* policies that do not relate to physical environmental issues will be considered by decision-makers as part of their decision whether to approve or disapprove the proposed project.

Proposition M – The Accountable Planning Initiative

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the *Planning Code* to establish eight Priority Policies. These policies, and the topics of the Evaluation of Environmental Effects addressing the environmental issues associated with the policies, are: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character (Question 1c, Land Use); (3) preservation and enhancement of affordable housing (Question 3b, Population and Housing, with regard to housing supply and displacement issues); (4) discouragement of commuter automobiles (Questions 4a, b, f, and g, Transportation and Circulation); (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership (Question 1c, Land Use); (6) maximization of earthquake preparedness (Questions 13 a-d, Geology, Soils, and Seismicity); (7) landmark and historic building preservation (Question 3a, Cultural Resources); and (8) protection of open space (Questions 8a and b, Wind and Shadow, and Questions 9a and c, Recreation).

Prior to issuing a permit for any project that requires an Initial Study under the California Environmental Quality Act (CEQA), and prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action that requires a finding of consistency with the *General Plan*, the City is required to find that the proposed project or legislation would be consistent with the Priority Policies.

As noted above, the compatibility of the proposed project with *General Plan* objectives and policies that do not relate to physical environmental issues will be considered by decision-makers as part of their decision whether to approve or disapprove the proposed project. Any potential conflicts identified as part of the process would not alter the physical environmental effects of the proposed project.

Regional Plans and Policies

The five principal regional planning agencies and their over-arching policy-plans to guide planning in the nine-county bay area include the Association for Bay Area Governments' (ABAG) *Projections 2009*, the Bay Area Air Quality Management District's (BAAQMD's) *Bay Area 2010 Clean Air Plan (2010 Clean Air Plan)*, the Metropolitan Transportation Commission's Regional Transportation Plan – Transportation 2035, the San Francisco Regional Water Quality Control Board's San Francisco Basin Plan, and the San Francisco Bay Conservation and Development Commission's *San Francisco Bay Plan*. Due to the size and nature of the proposed project, no anticipated conflicts with regional plans would occur.

Required Approvals by Other Agencies

See pages 12 and 13 for a list of required approvals.

D. SUMMARY OF ENVIRONMENTAL EFFECTS

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

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

This Initial Study examines the proposed project to identify potential effects on the environment. For each item on the Initial Study checklist, the evaluation has considered the impacts of the proposed project both individually and cumulatively. All items on the Initial Study Checklist that have been checked "Less than Significant Impact with Mitigation Incorporated," "Less than Significant Impact," "No Impact" or "Not Applicable," indicate that, upon evaluation, staff has determined that the proposed project could not have a significant adverse environmental effect relating to that issue. A discussion is included for those issues checked "Less than Significant Impact with Mitigation Incorporated" and "Less than Significant Impact" and for most items checked with "No Impact" or "Not Applicable." For all of the items checked "No Impact" or "Not Applicable" without discussion, the conclusions regarding potential significant adverse environmental effects are based upon field observation, staff experience and expertise on similar projects, and/or standard reference material available within the Department, such as the Department's *Transportation Impact Analysis Guidelines for Environmental Review*, or the California Natural Diversity Data Base and maps, published by the California Department of Fish and Game. For each checklist item, the evaluation has considered the impacts of the proposed project both individually and cumulatively. The items checked above have been determined to be "Less than Significant with Mitigation Incorporated."

SENATE BILL 743 AND PUBLIC RESOURCES CODE SECTION 21099

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014.³ Among other provisions, SB 743 amended CEQA by adding Public Resources Code Section 21099 regarding the analysis of aesthetics and parking impacts for certain urban infill projects in transit priority areas.⁴

³ SB 743 can be found on-line at: http://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB743.

⁴ A "transit priority area" is defined in as an area within one-half mile of an existing or planned major transit stop. A "major transit stop" is defined in Section 21064.3 of the California Public Resources Code as a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. A map of San Francisco Transit Priority Areas can be found on-line at: <http://sfmea.sfplanning.org/Map%20of%20San%20Francisco%20Transit%20Priority%20Areas.pdf>.

Aesthetics and Parking Analysis

Public Resources Code Section 21099(d), effective January 1, 2014, provides that, “aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment.” Accordingly, aesthetics and parking are no longer to be considered in determining if a project has the potential to result in significant environmental effects for projects that meet all of the following three criteria:

- 1) The project is in a transit priority area; and
- 2) The project is on an infill site; and
- 3) The project is residential, mixed-use residential, or an employment center.

The proposed project meets each of the above three criteria and thus, this Initial Study does not consider aesthetics and the adequacy of parking in determining the significance of project impacts under CEQA.⁵

Public Resources Code section 21099(e) states that a Lead Agency maintains the authority to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers and that aesthetics impacts do not include impacts on historical or cultural resources. As such, there will be no change in the Planning Department’s methodology related to design and historic review.

The Planning Department acknowledges that parking conditions may be of interest to the public and the decision makers. Therefore, this Initial Study presents parking demand analysis for informational purposes and considers any secondary physical impacts associated with constrained supply (e.g., queuing by drivers waiting for scarce onsite parking spaces that affects the public right-of-way) as applicable in the transportation analysis in Section E.4, Transportation and Circulation.

⁵ San Francisco Planning Department, “Transit-Oriented Infill Project Eligibility Checklist,” Mason and Turk Street Residential Mixed-Use Project, Case No. 2012.0678E, March 31, 2014. This document is on file and available for public review at the San Francisco Planning Department, as part of Case File 2012.0678E.

E. EVALUATION OF ENVIRONMENTAL EFFECTS

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

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

The proposed project would construct a new building on an existing parking lot. All construction would occur within the existing lot boundaries of the project site and would not interfere with or change the existing street plan nor impede the passage of persons. Therefore, the proposed project would not physically divide an established community and impacts are considered less than significant.

Impact LU-2: The proposed project would be consistent with applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. (Less than Significant)

The proposed project would not substantially conflict with any applicable land use plan, policy, or regulation such that an adverse physical change would result (see Section C. Compatibility with Existing Zoning and Plans). Environmental plans and policies are those, like the *2010 Clean Air Plan*, which directly address environmental issues and/or contain targets or standards, which must be met in order to preserve or improve characteristics of the City's physical environment. The proposed project would not substantially conflict with any such adopted environmental plan or policy and this impact would be less than significant.

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

The project site is currently developed with a surface parking lot that serves the adjacent Hotel Metropolis. Land uses in the vicinity include a mixture of high-density retail, entertainment, and hotel, residential, and office uses. The proposed project would construct a new building consisting of residential and ground-floor commercial uses on the existing parking lot. While the proposed project would result in an intensification of use on the existing lot, the land use would not be out of character with the residential and mixed-use buildings that are typically found in the project vicinity. The proposed project would include land uses permitted and already

existing within the project vicinity. Therefore, the proposed project would not have a substantial impact regarding the existing character of the project's vicinity. Refer to Section E.3 Cultural and Paleontological Resources for a further description of this historic district and nearby historic resources.

Impact C-LU-1: The proposed project, in combination with past, present, and reasonably foreseeable future project in the vicinity of the project site, would result in less-than-significant cumulative impacts to land use. (Less than Cumulatively Considerable)

Cumulative land use projects in the vicinity of the project site consist of conversion of existing buildings to other uses (Proposed 229 Ellis Street,⁶ conversion of a vacant bath house to mixed-use residential) and construction of new buildings (Proposed 351V Turk Street and 145 Leavenworth Street,⁷ construction of two new residential buildings on existing parking lots). The proposed projects would result in noticeable physical change to the surrounding area in terms of increasing the number of persons in the surrounding area, within the vicinity of the project site. Although these changes would result in a more dense urban fabric, they would not alter the overall mix of retail, entertainment, and hotel, residential, and office uses in the area and they would not result in physical division of the established community. Some projects would require modifications, variances, or exceptions to *Planning Code* requirements or *General Plan* land use designations. The Proposed 5M Project (925 Mission Street),⁸ while a major project in its own right, would occur in a different neighborhood (SoMa), on the opposite side of major thoroughfares (Market Street and Mission Street), and would not combine with the proposed project in any substantial way to alter the project site neighborhood character.

Given that the proposed project and uses would occur within the boundaries of the existing lot lines, no physical barriers to movement through the community would occur, and the proposed project would not substantially conflict with any applicable land use plan, policy, or regulation such that an adverse physical change would result. Thus, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable land use impact.

⁶ This proposed project is on file and available for public review at the San Francisco Planning Department, as part of Case File 2009.0343.

⁷ This proposed project is on file and available for public review at the San Francisco Planning Department, as part of Case File 2012.1531.

⁸ This proposed project is on file and available for public review at the San Francisco Planning Department, as part of Case File 2011.0409.

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

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

In general, a project would be considered growth inducing if its implementation would result in substantial population increases and/or new development that might not occur if the project would not be implemented. Implementation of the proposed project would remove an existing parking lot construct a new mixed-use building with up to 109 dwelling units and 2,400 sf of retail space. The proposed project would therefore directly increase population and employment at the project site and contribute to anticipated population growth in both the neighborhood and citywide context.

The 2010 US Census reported a population of 805,235 residents in the City and County of San Francisco, and a population of 5,335 residents in Census Tract 125.01, which includes the project site and its immediate vicinity.⁹ The population of Census Tracts generally within the Downtown/Civic Center neighborhood is approximately 33,896 residents.¹⁰ Based on an average household size for Census Tract 125.01 of 2.42 persons per household, the addition of 109 dwelling units would increase the population at the project site by approximately 264 residents. This would represent a residential population increase of approximately 0.03 percent citywide, 0.8 percent within the Downtown/Civic Center neighborhood, and 4.72 percent within Census Tract 125.01. This increase in the number of residential units on the project site is not considered to be substantial. Therefore, implementation of the proposed project would not directly induce substantial population growth and would not indirectly induce substantial population growth in the project area, as it would not involve any extensions to area roads or other infrastructure.

⁹ United States Census 2010, "2010 Census Interactive Population Search." Available online at: <http://www.census.gov/2010census/popmap/>. Accessed November 13, 2013.

¹⁰ United States Census 2010. Census Tracts 120, 121, 122.01, 122.02, 123.01, 123.02, 124.01, 124.02, and 125.02 were included in this calculation, in the area generally bound by Bush Street to the north, Powell Street to the east, Market Street to the south, and Van Ness Avenue to the west.

The proposed project would also introduce commercial activity and employment to the site, estimated at approximately seven employees.¹¹ This minor increase in employment would not generate a substantial demand for additional housing in the context of Citywide employment growth.

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

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

The project site consists of a parking lot used by the adjacent Hotel Metropolis and includes no residents. Therefore, no residential, employee, or housing unit displacement would result from the proposed project. Assuming that some of these employees would be new to the region, the increase of seven employees could result in a small increase in demand for additional housing. However, the number of such employees would be very small compared to the total population and the available housing stock in San Francisco and the Bay Area and would not necessitate the construction of new housing. The proposed project would result in less-than-significant impacts related to the displacement of people or creation of demand for additional housing.

Impact C-PH-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would result in less-than-significant cumulative impacts to population and housing. (Less than Significant)

As described above, the proposed project would not induce substantial population growth or have significant physical environmental effects on housing demand or population. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable population and housing impact.

¹¹ San Francisco Planning Department, *Transportation Impact Analysis Guidelines for Environmental Review*, October 2002, Appendix C, Table C-1. An employment factor of 350 gsf per employee is used for general retail uses.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
3. CULTURAL AND PALEONTOLOGICAL RESOURCES—Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco <i>Planning Code</i> ?	☐	☒	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐	☐

Setting

Historic Architectural Resources

The following summarizes historic architectural resources in the area based on reports completed prior to and for the analysis of potential impacts for the proposed project. These reports, including the National Register nomination for the Uptown Tenderloin Historic District, a Historic Resource Evaluation (HRE) report prepared by Richard Brandi, and a Historic Resource Evaluation Response (HREER) prepared by the Planning Department,¹² are discussed and summarized below.

Uptown Tenderloin National Register Historic District

In May 2008, historians Michael R. Corbett and Anne Bloomfield prepared a National Register nomination form for the Uptown Tenderloin Historic District (District). Corbett and Bloomfield found that the area contains an eligible historic district that is significant for listing in the National Register of Historic Places (NRHP)/California Register of Historical Resources (CRHR) under Criterion A/1 in the area of Social History for its association with the development of hotel and apartment life in San Francisco during a critical period of change. As a distinctive residential area it is also associated with commercial activity, entertainment, and vice culture. In addition, the district was found to be significant under National Register of Historic Places (NRHP)/California Register of Historical Resources (CRHR) Criterion C/3 in the area of Architecture for its distinctive mix of building types that served a new urban population of office

¹² Richard Brandi, *Historic Resource Evaluation, Proposed 19-25 Mason Street Project*, March 28, 2014. Michael Corbett and Anne Bloomfield, *National Register Nomination for Uptown Tenderloin Historic District*, May 2008. San Francisco Planning Department, *19-25 Mason Street, Historic Resource Evaluation Response*, April 14, 2014. These documents are on file and available for public review at the San Francisco Planning Department, as part of Case File 2012.0678E.

and retail workers. Predominantly hotels and apartments, the District also includes non-residential building types associated with life in the neighborhood. The District is significant at the local level for the period 1906-1957. The District was listed in the National Register on February 5, 2009 and is recognized by the San Francisco Planning Department as a historic district for the purposes of CEQA review.

The project site and most of the surrounding buildings are within the District. The District boundaries are irregular and are generally defined as: Mason and Taylor Streets to the east, Geary Boulevard to the north, Larkin Street to the west, and Golden Gate Avenue and McAllister Street to the south; thus the project site is located at the eastern edge of the District. The District comprises 18 whole and 15 partial city blocks and 477 total buildings and sites, of which 410 and 67 are considered as contributing and non-contributing resources to the District, respectively. Properties were considered contributing if they were built during the period of significance and relate to the significance and character defining features identified for the District (see below). Resources were considered non-contributing if they were built or substantially altered after the period of significance or are vacant lots or other visual intrusions in the district. The project site block (block 0340) contains 12 district contributors and five non-contributing vacant lots or parking lots, including the project site. The project site is adjacent to three district contributors: 2-16 Turk Street (Hotel Metropolis, 10 stories), 34-48 Turk Street (Dalt Hotel, 7 stories), and 35-65 Mason Street (Ambassador Hotel, 6 stories). Adjacent contributors display the character-defining features described below and are some of the tallest district contributors due to the proximity of the subject block to Market Street. The Hotel Metropolis (2-16 Turk Street) is also listed as a Category I (Significant) property under Article 11 of the Planning Code and thus is also considered an individual historic resource.

The District is formed around its predominant building type: a three-to-seven-story, multi-unit apartment, hotel, or apartment-hotel constructed of brick or reinforced concrete. On the exteriors, sometimes only signage clearly distinguishes between these related building types. Because virtually the entire District was constructed in the quarter-century between 1906 and the early 1930s, a limited number of architects, builders, and clients produced a harmonious group of structures that share a single, classically oriented visual imagery using similar materials and details. Mixed in among the predominantly residential buildings are examples of other building types that support residential life, including churches, stores, garages, a YMCA complex, and a bathhouse. In addition there are a few building types that are not directly related to the residential neighborhood: machine shops, office buildings, union halls, and film exchanges. While not necessarily related to residential life, the union halls (for example, those serving waitresses and musicians) and the film exchanges are related to the overlay of entertainment businesses in around the neighborhood.

The character defining exterior features of the District (i.e., physical features that enable the district to convey its historic identity) are described in Table 1, below.

TABLE 1
UPTOWN TENDERLOIN NATIONAL REGISTER HISTORIC DISTRICT CHARACTER DEFINING FEATURES

Exterior
• Three- to-seven-story building height; • Buildings occupy entire width of lot creating a continuous street wall; • Building types: multi-unit apartments, hotels, or apartment-hotels, as well as other building types that support residential life, including institutional and commercial uses; • Constructed of brick or reinforced concrete; • Clear articulation of three-part vertical building composition of articulated base, shaft and prominent overhanging cornice; • Punched double-hung wood-sash or casement windows with transoms; • Projecting angled or curved bay windows; • Prominent fire escapes on primary facades; • Elaborately detailed residential entrances; and • Other decorative features: segmented arches, iron window lintels, brick or stucco facings, molded galvanized iron, terra cotta or cast concrete features, sandstone or terra cotta rusticated bases, columns, sills, lintels, quoins, entry arches, keystones, string courses, engraved or painted signs and bronze plaques.

Archeological Resources

A preliminary review for potential impacts to archeological resources was conducted for the proposed project.¹³ The following setting information and analysis below relies on the information provided in the preliminary review.

Assessors Block 340, Lot 002, which fronts on Mason Street, is covered by a 7.5-to-9.5-inch thick reinforced concrete slab underlain by approximately 14 feet of void space with a concrete slab at the bottom of void space. Assessors Block 340, Lots 005 and 006, which fronts on Turk Street, is covered by concrete pavement underlain by approximately 10-12 feet of artificial fill with a concrete slab at the bottom of the fill. Native dune sand is present beneath the void space for Lot 002 (14 feet bgs) and the fill for Lots 005 and 006 (10-12 feet bgs) to approximately 22 feet bgs. Below this depth, the Colma formation is present. Both the native dune sands and the top several feet of the Colma formation, approximately 10-25 feet bgs within the project site, are sensitive for prehistoric archeological resources and therefore, there is the potential for the presence of significant prehistoric archeological deposits within the project site.

No prehistoric sites have been recorded in the project vicinity north of Market Street. However, several prehistoric sites are located nearby on the southern side of Market Street. The nearest prehistoric site was recorded roughly between 10.5 to 15.7 feet bgs. Based on a review of early 1850s US Coast Survey maps, the project area is in a similar terrain as those nearby prehistoric sites. During this era, the project area was on a relatively flat area approximately 40 feet above sea level and surrounded by sand dunes north of the marshes of Mission Bay.

¹³ Allison Vanderslice, *Environmental Planning Preliminary Archeological Review: Checklist for 19-25 Mason Street/2-16 Turk Street*, September 17, 2013. This document is on file and available for public review at the San Francisco Planning Department, as part of Case File 2012.0678E.

Historically, the project area was not improved with more than a path before 1869. By 1887, dwellings and a saloon (Lot 002), a drug store with a doctor's office above (Lot 005), and a store and a saloon (Lot 006) were present on the project site. Post-1906 earthquake and fire development of the project site resulted in several buildings with basements that disturbed the majority of the project site to approximately 9 to 14 feet bgs, as evidenced by the concrete slabs encountered during geotechnical investigations. These buildings were demolished in the 1950s and the project site has been used as a parking lot since the 1960s.

Paleontological Resources

Paleontological resources consist of the fossilized remains of plants and animals. Of the sedimentary deposits identified above in the Archeological Resources section, the Colma Formation is the only deposit within the project site that is sensitive for paleontological resources that has the potential to be disturbed by proposed project activities. The Colma Formation consists of Pleistocene-age sand, silty sand, and sandy clay deposits that are of both marine and nonmarine origin. According to the investigations conducted for the California Pacific Medical Center Long Range Development Plan EIR, the Colma formation is considered paleontologically sensitive because sources suggest that the location of some recorded Rancholabrean-age fossils could be correlated with the Colma formation.¹⁴

Impact CP-1: During construction, the proposed project's activities would result in groundborne vibration that could structurally impact and materially impair nearby historically significant buildings. (Less than Significant with Mitigation)

Typically, groundborne vibration generated by activities attenuates rapidly with distance from the source of the vibration. Structures, especially older masonry structures, are sensitive to groundborne vibration. Groundborne vibration can cause movement of building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. In extreme cases, the vibration can cause damage to buildings.

Several different methods are used to quantify vibration, of which peak particle velocity (PPV) is most frequently used to describe vibration impacts on buildings. PPV is defined as the maximum instantaneous peak of the vibration signal in inches per second. The Federal Transit Administration (FTA) significance criteria for non-engineered timber and masonry buildings is a PPV of 0.2 or greater and for engineered concrete and masonry buildings is a PPV of 0.3 or greater.¹⁵

Of the various construction equipment that generates vibration, vibrating pile drivers are associated with the greatest vibration levels. Other construction equipment that generates vibration includes clam shovel drop, bulldozers, jackhammers, and loaded trucks. Table 2 identifies the PPV at 25 feet and 82.5 feet of various pieces of typical construction equipment

¹⁴ San Francisco Planning Department, *California Pacific Medical Center, Long Range Development Plan Draft EIR*, July 21, 2010, Chapter 4.4. This project is on file and available for public review at the San Francisco Planning Department, as part of Case File 2005.0555E.

¹⁵ Federal Transit Administration (FTA), *Transit Noise and Vibration Impact Assessment*, May 2006, Table 12-3.

(note: at a distance of 100 feet, even the upper range vibration level from pile driving would be less than the FTA criteria of 0.2 PPV for structure damage).^{16, 17}

**TABLE 2
VIBRATION VELOCITIES FOR CONSTRUCTION EQUIPMENT**

Equipment	PPV at 25 feet (inches/second)	PPV at 82.5 feet (inches/second)
Impact Pile Driver (upper range)	1.518	0.265
Impact Pile Driver (typical)	0.644	0.113
Sonic Pile Driver (upper range)	0.734	0.132 ^a
Sonic Pile Driver (typical)	0.170	0.031 ^a
Clam shovel drop (slurry wall)	0.202	0.037
Hoe Ram	0.089	0.035
Large bulldozer	0.089	0.016
Loaded trucks	0.076	0.013
Jackhammer	0.035	0.006 ^a
Small bulldozer	0.003	0.001

Source: FTA, 2006, Table 12-2 and San Francisco Planning Department, *Western SoMa EIR*, 2012.

- a. An 82 percent reduction was assumed from the estimated PPV values at 25 feet, consistent with reductions taken for the other pieces of equipment as reported in the *Western SoMa EIR*.

The project site is within the Uptown Tenderloin Historic District and adjacent to or within 25 feet of the following contributors to the historic district: Hotel Metropolis (which is also identified as significant by Article 11 of the Planning Code), Ambassador Hotel, Dalt Hotel, and 141 Eddy Street. In addition, as mentioned in the setting, the project site is within the same block of other contributory buildings to the historic district. These adjacent and nearby buildings and other contributors to the historic district are commonly constructed of brick (masonry) or reinforced concrete, which could be susceptible to damage from vibration-related construction activities.

The proposed project would include excavation to a depth of approximately 18 feet bgs for a reinforced mat foundation and to a depth of approximately 24 feet bgs for an elevator pit. The geotechnical investigation conducted for the proposed project recommended a temporary

¹⁶ FTA, 2006, Table 12-2.

¹⁷ San Francisco Planning Department, *Western SoMa Community Plan, Rezoning of Adjacent Parcels and 350 Eighth Street Project Final EIR (Western SoMa EIR)*, December 6, 2012, Section 4.F. This project is on file and available for public review at the San Francisco Planning Department, as part of Case File 2008.0877E and 2007.1035E.

shoring system with cantilevered soldier piles and timber lagging during construction.¹⁸ Construction activities, including the use of heavy equipment near adjacent buildings and the installation of cantilevered soldier piles that could require the use of pile driving and other vibratory methods, could structurally impact and materially impair nearby historically significant buildings within 100 feet of the project site. This is considered a significant impact.

Mitigation Measures M-CP-1a and M-CP-1b would apply to any components of the proposed project resulting in ground-disturbing activities. These measures require, among other things, the project sponsor to set a performance standard for maximum vibration levels and use construction best practices to avoid vibration damages on adjacent and nearby historic buildings based on that performance standard. In addition, monitoring is required to document and remediate any damage to adjacent and nearby historic buildings caused by construction activities at the project site. With implementation of Mitigation Measures M-CP-1a and M-CP-1b, to which the project sponsor has agreed, the proposed project would result in less-than-significant vibration impacts to historical architectural resources.

Mitigation Measure M-CP-1a: Construction Best Practices for Historical Architectural Resources

The project sponsor shall incorporate into construction specifications for the project a requirement that the construction contractor(s) use all feasible means to avoid damage to adjacent and nearby historic buildings (contributors to historic districts and/or individually significant), including, but not necessarily limited to:

- Using techniques in removal of the parking lot, excavation, shoring, and construction that create the minimum feasible vibration;
- Appropriately shoring excavation sidewalls to prevent movement of potentially affected buildings, as necessary;
- Underpinning of foundations of potentially affected buildings, as necessary;
- Restricting the use of heavy equipment within 10 horizontal feet from potentially affected shallow foundation and basement walls; and
- The installation of soldier piles shall implement pile driving technology with less groundborne vibration than impact drivers (e.g., such as pre-drilling of piles and sonic pile drivers), where feasible.
- The installation of soldier piles and other vibratory methods shall be restricted within 25 feet of existing potentially affected buildings or at distances set to meet the maximum vibration level(s) established by the requirements in Mitigation Measure M-CP-1b, whichever is more restrictive.

¹⁸ Rockridge Geotechnical, *Geotechnical Investigation, Proposed Residential Building, 1-25 Mason Street, San Francisco, California*, October 29, 2012. This document is on file and available for public review at the San Francisco Planning Department, as part of Case File 2012.0678E.

Mitigation Measure M-CP-1b: Construction Monitoring Program for Historical Architectural Resources

The project sponsor shall undertake a monitoring program to minimize damage to nearby historic resource buildings (contributors to historic districts and/or individually significant) and to ensure that any such damage is documented and repaired. The monitoring program shall include the following components: Prior to the start of any ground-disturbing activity, the project sponsor shall engage a historic architect or qualified historic preservation professional to undertake a preconstruction survey of historical resource(s) identified by the Planning Department within 100 feet of planned construction to document and photograph the buildings' existing conditions (e.g., crack survey). Based on the construction and conditions of the resource(s), the professional, in consultation with the Department of Building Inspection or qualified geotechnical engineer, if necessary, shall establish a maximum vibration level(s) that shall not be exceeded at each building, based on the existing condition, character-defining features, soils conditions, and anticipated construction practices (a common standard is 0.2 or 0.3 inches per second, peak particle velocity). To ensure that vibration levels do not exceed the established standard(s), the project sponsor shall monitor vibration levels at each surveyed building and shall prohibit vibration construction activities that generate vibration levels in excess of the standard(s).

Should vibration levels be observed in excess of the standard(s), construction shall be halted and alternative techniques put into practice, to the extent feasible. The professional shall conduct regular periodic inspections of each surveyed building during ground-disturbing activity on the project site. Should damage to the surveyed building(s) occur from construction activities on the project site, the surveyed building(s) shall be remediated to its' preconstruction conditions immediately following the conclusion of ground-disturbing activity on the project site.

Impact CP-2: The proposed project's new building would not cause a substantial adverse change in the significance of a historic district, Uptown Tenderloin Historic District, including the individual historic resource at 2-16 Turk Street. (Less than Significant)

The project site is currently used as a fenced-in surface parking lot for 54 vehicles, serving the adjacent Hotel Metropolis. The proposed project would include removal of the existing surface parking lot. The surface parking lot is identified as a non-contributor to the Uptown Tenderloin National Historic District (District). In addition, the project site is not identified as an individually significant historic resource pursuant to CEQA. Therefore, the proposed project would have no historic resource impact to the project site.

The proposed project would construct a new 12-story, 120-foot-tall (131-to-140-foot tall with above-roof structures), 112,600 gsf building on the entirety of the existing surface parking lot. The height and massing of the new building is consistent with the overall scale of existing buildings within the District. Most contributing buildings in the District range in height from three to seven stories. Near Market Street and on corner lots, buildings rise higher than this average, including the Hotel Metropolis, currently the tallest building on the subject block at 10 stories. Existing buildings on the subject block range in height from 2 to 10 stories. The proposed

project involves the construction of a 12-story building that wraps around the Hotel Metropolis. The new building appears as one story taller than the Hotel Metropolis due to the difference in floor-to-floor heights of the buildings. The upper portion of the new building includes the following features that relate to the Hotel Metropolis: an intermediate cornice between the 11th and 12th stories that relates to the prominent projecting cornice of the adjacent Hotel Metropolis, simplification of the wall treatment of the upper story, and change in material of the upper story to allow the top floor of the building to appear less prominently as the Hotel Metropolis when viewed from the street.

The District features a continuous street wall of similar buildings. The existing condition of the project site includes a surface parking lot that is seen as a visual intrusion to the District through gaps in the continuous street wall along both Mason Street and Turk Street. The proposed project would infill two large gaps in the street wall on both aforementioned streets and would provide greater continuity of the street wall in this portion of the District.

The new building would consist of 109 residential dwelling units and 2,400 sf of ground-floor retail. This type of building is consistent with the multi-unit apartments and other building types that support residential life, including commercial uses that are found in the District.

The proposed project would feature a series of vertically oriented window openings that reference the character-defining punched window openings seen throughout the District, but appear as a clearly contemporary interpretation of this feature. The openings provide some alignment with the window openings of adjacent District contributors to provide visual connection along the street wall.

The materials of the new building would be consistent with the character of existing materials in the District. The pre-cast concrete cladding is neutral in color and would be visually compatible with the predominant neutral stone materials found throughout the District. Horizontally scored pre-cast concrete with a sandstone/brown finish would be used for the base to relate to the tradition of rusticated, differentiated bases of existing buildings in the District. A lighter shade of pre-cast concrete panels would be used for the upper stories to different the middle portion of the new building from its base. Contemporary materials such as painted aluminum and glass would be used for the storefront detailing and would appear as compatible with the overall character of storefronts in the District. The top floor of the new building would be clad with a dark gray painted aluminum composite material that would allow this portion of the new building to appear as a separate element, but one that does not compete with the decorative over-hanging cornice of the adjacent Hotel Metropolis.

Overall, the proposed design is compatible with the overall massing, height, materials, composition and character of contributing buildings within the District and would not cause a significant impact to the District, including the individual historic resource at 2-16 Turk Street. As designed, the proposed project would not materially impair the significance of the District, including the individual historic resource at 2-16 Turk Street, and impacts are considered less-than-significant.

Impact CP-3: The proposed project would potentially cause a substantial adverse change in the significance of an archeological resource and potentially disturb human remains, including those interred outside of formal cemeteries. (Less than Significant with Mitigation)

Subsurface construction for the proposed project would include a reinforced mat foundation to a depth of approximately 18 feet bgs and an elevator pit to a depth of approximately 24 feet bgs. The subsurface construction could potentially encounter and result in a change in the significance of an archeological resource, with potential anticipated archeological resources being prehistoric resources, and the low possibility of disturbing human remains, within the native sand dunes and top of the Colma formation between approximately 10 and 24 bgs. This is considered a potentially significant impact.

Mitigation Measure M-CP-3 would apply to any components of the proposed project resulting in soils disturbance of ten feet or greater below the ground surface. This measure requires, among other things, the project sponsor to prepare an archeological monitoring plan. With implementation of Mitigation Measure M-CP-3, to which the project sponsor has agreed, the proposed project would result in less-than-significant impacts to archeological resources.

Mitigation Measure M-CP-3: Archeological Resource Monitoring

Based on the reasonable potential that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of an archaeological consultant 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 monitoring program. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the Environmental Review Officer (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 Sect. 15064.5 (a)(c).

Archeological monitoring plan (AMP). The archeological monitoring plan 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 project archeologist 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 (foundation, shoring, etc.), site

remediation, etc., shall require archeological monitoring because of the potential risk these activities pose to archaeological 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 archaeological 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 the 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 crews and heavy 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, after making a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, present the findings of this assessment to the ERO.

Consultation with Descendant Communities: On discovery of an archeological site¹⁹ associated with descendant Native Americans or the Overseas Chinese an appropriate representative²⁰ 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 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 Archaeological Resources Report shall be provided to the representative of the descendant group.

¹⁹ By the term “archeological site” is intended here to minimally include any archeological deposit, feature, burial, or evidence of burial.

²⁰ 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 and in the case of the Overseas Chinese, the Chinese Historical Society of America.

If the ERO in consultation with the archeological consultant 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) An archeological 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.

If an archeological data recovery program is required by the ERO, the archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The project archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP. The archeological consultant shall prepare a draft ADRP that shall be submitted to the ERO for review and approval. 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 will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the 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.

Human Remains, Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils

disturbing activity shall comply with applicable State and Federal Laws, including immediate notification of the Coroner of the City and County of San Francisco and the ERO and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archeological consultant, project sponsor, ERO and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, curation, possession, and final disposition of the human remains and associated or unassociated funerary objects.

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 draft final report.

Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The 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 or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.

Impact CP-4: The proposed project could result in damage to, or destruction of, as-yet unknown unique paleontological resource or site or unique geologic feature. (Less than Significant with Mitigation)

Paleontological resources include fossilized remains or traces of animals, plants, and invertebrates, including their imprints, from a previous geological period. Collecting localities and the geological formations containing those localities are also considered paleontological resources; they represent a limited, nonrenewable, and impact sensitive scientific and educational resource. No unique geologic features exist at the project site.

Excavation and foundation work resulting from the proposed project would not be expected to adversely affect paleontological resources. Subsurface construction for the proposed project would include a reinforced mat foundation to a depth of approximately 18 feet bgs and an elevator pit to a depth of approximately 24 feet bgs. At approximately 22 feet bgs, the Colma formation is present, which could contain paleontological resources. Because project excavation

would be expected to affect soils to at this depth, the proposed project could affect geologic units that might contain paleontological remains or trace of paleontological remains. This is considered a potentially significant impact.

Mitigation Measure M-CP-4 would apply to any components of the proposed project resulting in soils disturbance of 22 feet or greater below the ground surface. This measure requires, among other things, the project sponsor to hire a qualified paleontologist to train construction personnel regarding the possibility of encountering fossils and the steps that shall occur if fossils are encountered. With implementation of Mitigation Measure M-CP-4, to which the project sponsor has agreed, the proposed project would result in less-than-significant impacts to paleontological resources.

Mitigation Measure M-CP-4: Paleontological Resource Accidental Discovery

Based on the reasonable potential that paleontological resources may be present within the project site at excavation depths within the Colma formation, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on paleontological resources. Before the start of any earthmoving activities, the project sponsor shall retain a qualified paleontologist to train all construction personnel involved with earthmoving activities, including the site superintendent, regarding the possibility of encountering fossils, the appearance and types of fossils likely to be seen during construction, and proper notification procedures should fossils be encountered.

If paleontological resources are discovered during earthmoving activities, the construction crew shall immediately cease work near the find and notify the project sponsor and the San Francisco Planning Department. The project sponsor shall retain a qualified paleontologist to evaluate the resource and prepare a recovery plan in accordance with Society of Vertebrate Paleontology guidelines.²¹ The recovery plan may include a field survey, construction monitoring, sampling and data recovery procedures, museum storage coordination for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the City to be necessary and feasible shall be implemented before construction activities can resume at the site where the paleontological resources were discovered.

Impact C-CP-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not cause a substantial adverse change in the significance of a historic district, Uptown Tenderloin Historic District. (Less than Significant)

As stated above, the proposed project would construct a new building within the Uptown Tenderloin National Register historic District (District). However, the proposed design is compatible with the overall massing, height, materials, composition and character of contributing buildings within the District and would not cause a significant impact to the District. Two other cumulative projects exist within the District (229 Ellis Street and 351V Turk Street and 145 Leavenworth Street), as identified within Section E.1 Land Use and Land Use Planning.

²¹ Society of Vertebrate Paleontology, "Conditions of Receivership for Paleontologic Salvage Collections (final draft)," 1996, *Society of Vertebrate Paleontology News Bulletin* 166:31-32.

However, those proposed projects would not demolish existing resources within the District and each will be evaluated for its impact on historic resources per the requirements of CEQA and the procedures for evaluation for historical architectural resources, including: (1) whether the project itself would have a direct impact on historic resources and (2) whether the project would impact the historic context of a particular resources and/or would have an incidental impact on nearby resources. For these reasons, the proposed project would not result in a cumulatively considerable impact on the District.

Impact C-CP-2: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not cause a substantial adverse in the significance of an archeological or paleontological resources nor disturb human remains. (Less than Significant)

Project-related impacts on archeological or paleontological resources and human remains are site-specific and generally limited to the proposed project's construction area. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable impact on archeological or paleontological resources and human remains.

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

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐	☐

The project site is not located within an airport land use plan area, or in the vicinity of a private airstrip. The proposed project would not interfere with air traffic patterns. Therefore, topic 4c is not applicable.

A transportation study was prepared for the proposed project.²² The following discussion relies on the information provided in the transportation study.

Setting

The project site is within the Tenderloin neighborhood near the intersection of Turk Street and Mason Street, one block north of Market Street. The project site is within the block bounded by Eddy Street to the north, Mason Street to the east, Turk Street to the south, and Taylor Street to the west. In the project site vicinity, Eddy Street runs one-way eastbound with two travel lanes and metered parking on both sides; Mason Street runs one-way southbound with two travel lanes and metered parking on both sides; Turk Street runs one-way westbound with two travel lanes and no parking on either side;²³ and Taylor Street runs one-way northbound with three travel lanes and metered parking on both sides. None of these streets contain bikeways in the project site vicinity.²⁴ Adjacent to the project site, the width of the existing sidewalk on Turk Street is approximately 12 feet and the existing sidewalk width on Mason Street is approximately 15 feet. Pedestrian curb ramps are provided to cross intersections near the project site, except for pedestrians heading south across Turk Street from the west side of Mason Street. An existing 19-foot-wide curb cut on Turk Street is located adjacent to a Muni bus stop (see below) for vehicular access to the existing parking lot on the project site. An 86-foot-long passenger loading/unloading zone for the Metropolis Hotel is located to the east of the existing curb-cut on Turk Street. In addition, an existing 22-foot, six-inch wide curb cut is located along Mason Street for vehicular access to the existing parking lot on the project site.

²² Stantec Consulting Services, *19-25 Mason Street Transportation Study*, May 1, 2014. This document is on file and available for public review at the San Francisco Planning Department, as part of Case File 2012.0678E.

²³ In early 2014, the San Francisco Municipal Transportation Agency removed parking from both sides of the Turk Street block between Taylor and Mason Streets. This parking removal was not accounted for in the project-specific transportation study, but is included in the analysis below.

²⁴ Bikeways are typically classified as Class I, II, or III bikeways. "Class I bikeways are bicycle paths with exclusive right-of-way for use by bicyclists or pedestrians. Class II bikeways are bicycle lanes striped with the paved areas of roadways, and established for the preferential use of bicycles, while Class III bikeways are signed bicycle routes that allow bicycles to share streets or sidewalks with vehicles or pedestrians." San Francisco Bicycle Plan FEIR, Volume 1, p. V.A.1-14. This document is one file and available for public review at the San Francisco Planning Department, as part of Case File 2007.0347E.

Market Street runs two-way northeast-southwest with two lanes in each direction. Left turns for private vehicles from Market Street are prohibited in the study area. Bi-directional streetcar tracks run along the center lanes of Market Street between Fremont Street and Castro Street. One travel lane in each direction is reserved for buses only along various stretches of Market Street. Market Street is a major bicycle route (Route 50) within San Francisco that connects other bicycle routes. Within the study area, Market Street has a Class III bikeway. Market Street is also a major pedestrian route, with high volumes and wide sidewalks near the project site, especially closer to the Powell Street Muni/BART station.

The project site is well-served by public transit, with both local and regional service provided nearby. The Muni local service route 31 – Balboa operates on Eddy Street, Mason Street, and Turk Street. The Muni express, peak hour service route, 16X- Noriega also operates along Turk Street. Both of these Muni routes stop adjacent to the project site in a 120-foot-long Muni bus stop. The project site is approximately 400 feet from the Powell Street Muni/BART station, which serves all Muni Metro lines and BART. In addition, several other Muni lines stop near the project site along Market Street (e.g., 9L – San Bruno; 21 – Hayes; 71L – Haight-Noriega).

Approach to Analysis

Policy 10.4 of the Transportation Element of the *General Plan* states that the City will “Consider the transportation system performance measurements in all decisions for projects that affect the transportation system.” To determine whether the proposed project would conflict with a transportation- or circulation-related plan, ordinance or policy, this section describes the potential impacts that these rehabilitations and improvements could have on traffic, transit, pedestrian, bicycle, loading, parking, and emergency vehicle circulation, as well as any potential transportation impacts related to construction of the proposed project. Parking is also discussed for informational purposes.

Impact TR-1: The proposed project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, nor would the proposed project conflict with an applicable congestion management program. (Less than Significant)

Trip Generation

Based on the *Transportation Impact Analysis Guidelines for Environmental Review*, October 2002 (*Transportation Guidelines*),²⁵ the proposed project would generate 1,288 daily person-trips and 207 daily vehicle-trips. During the PM peak hour, the proposed project would generate an estimated 195 PM peak hour trips, consisting of 39 auto trips (or 34 vehicle trips, which accounts for vehicle occupancy data), 91 transit trips, 53 walking trips, and 12 other trips (other includes bicycle, motorcycle, taxi and additional modes). During the AM peak hour, the proposed project would generate an estimated 29 vehicle trips.

²⁵ This document can be found here: <http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=6753>.

Traffic

As set forth in the *Transportation Guidelines*, the Planning Department evaluates traffic conditions for the weekday PM peak hour conditions (between the hours of 4 PM to 6 PM), which typically represent the worse conditions for the local transportation network. In addition, for this analysis, weekday AM peak hour conditions (between the hours of 7 AM to 9 AM) were also evaluated for studied intersections along Market Street and Mission Street. As shown in Table 3, eight intersections were evaluated during the PM peak hour, of which four were also evaluated during the AM peak hour. Although the proposed project is estimated to generate 34 PM peak hour vehicle trips and 29 AM peak hour vehicle trips, these vehicle trips would not change the level of service (LOS)²⁶ at the intersections in the project vicinity, and would not be considered a substantial traffic increase to the existing capacity of the local street system. Therefore, the proposed project's impact on existing vehicular traffic is considered less than significant.

**TABLE 3
AM AND PM PEAK HOUR LEVEL OF SERVICE AND DELAY ANALYSIS**

Intersection	Existing				Existing plus Project			
	AM Peak		PM Peak		AM Peak		PM Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
Market/Mason/Turk	11.0	B	11.1	B	11.1	B	11.2	B
Market/6 th /Taylor	31.1	C	25.2	C	31.4	C	25.4	C
Market/5 th	16.0	B	17.0	B	16.0	B	17.0	B
Turk/Jones			13.6	B			13.6	B
Turk/Taylor			17.0	B			17.0	B
Eddy/Taylor			16.2	B			16.1	B
Eddy/Mason			14.4	B			15.0	B
Mission/5th	20.1	C	25.9	C	20.1	C	26.0	C

Source: Stantec, 2014

Delay is presented in seconds per vehicle.

LOS = Level of Service

Other Traffic Issues

The proposed project would remove the existing curb cuts on Turk Street and Mason Street. The proposed project would include a new curb cut approximately 10 feet nine inches east of the existing Muni bus stop and the existing curb cut on Turk Street. The new curb cut would provide vehicular access into and out of the proposed project's at-grade and underground parking garage. During the PM peak hour, this driveway would serve 34 vehicle trips (20 inbound, 14 outbound), which is equivalent to one vehicle entering or exiting the garage and crossing the sidewalk on average every one to two minutes during the peak hour and less frequently throughout the rest of the day. A queue could form on Turk Street as vehicles wait to access the

²⁶ Level of service (LOS) is a qualitative measure of an intersection's performance based on the average delay per vehicle. LOS has letter designations ranging from A to F, with LOS A representing free flow traffic with little or no delay and LOS F representing jammed conditions with excessive delay and long back-ups.

parking garage if substantial pedestrian activity is occurring, but this queuing is not anticipated to occur frequently based on the limited number of proposed project-related vehicle trips. Given the relatively infrequent number of proposed project-related vehicle trips, the low traffic volumes along Turk Street, and that the proposed project would not include components that would obstruct traffic, the proposed project would have a less-than-significant impact on traffic operations or traffic hazards in the project vicinity. Potential conflicts with transit operations, passenger loading/unloading zone and pedestrians on Turk Street is further discussed below.

Although the proposed project would have less than significant traffic impacts, the project sponsor has agreed to the following improvement measures that could further reduce the less-than-significant impacts of automobile traffic on adjacent and area roadways.

Improvement Measure I-TR-1a: Implement Additional and Project-Specific Travel Demand Strategies to Reduce Vehicle Trips

The project sponsor, property owner, or official designee of the development, should implement a Transportation Demand Management (TDM) Program that seeks to minimize the number of single occupancy vehicle (SOV) trips generated by the proposed project for the lifetime of the project. The TDM Program targets a reduction in SOV trips by encouraging persons to select other modes of transportation, including, walking, bicycling, transit, car-share, carpooling, and/or other modes.

The project sponsor has agreed to implement the following TDM measures:

- **Identify TDM Coordinator:** The project sponsor should identify a TDM coordinator for the project site. The TDM Coordinator is responsible for the implementation and ongoing operation of all other TDM measures described below. The TDM Coordinator could be a brokered service through an existing transportation management association (e.g., the Transportation Management Association of San Francisco), or the TDM Coordination could be an existing staff member (e.g., property manager); the TDM Coordinator does not have to work full-time at the project site. However, the TDM Coordinator should be the single point of contact for all transportation-related questions from building occupants and City staff. The TDM Coordinator should provide TDM training to other building staff about the transportation amenities and options available at the project site and nearby.
- **Provide Transportation and Trip Planning Information to Building Occupants:**
 - *Move-in packet:* Provide a transportation insert for the move-in packet that includes information on transit service (local and regional, schedules and fares), information on where transit passes could be purchased, information on the 511 Regional Rideshare Program and nearby bike and car share programs, and information on where to find additional web-based alternative transportation materials (e.g., NextMuni phone app). This move-in packet should be continuously updated as local transportation options change, and the packet should be provided to each new building occupant. Provide Muni maps, San Francisco Bicycle and Pedestrian maps upon request. A NextMuni digital screen on-site could be a way of detailing real-time Muni transit information.

- *Current transportation information:* Provide ongoing local and regional transportation information and updates (e.g., up-to-date transit maps and schedules, maps of bicycle routes, internet links) for new and existing occupants.
- *Ride Board:* Provide a “ride board” through which residents can offer/request rides, on the Homeowners Association website and/or lobby bulletin board.
- **Bicycles:**
 - *Signage:* Ensure that the points of access to bicycle parking through elevators on the ground floor (preferred location) and the garage ramp include signage indicating the location of these facilities.
 - *Tenant Cooperation:* Encourage commercial tenants to allow bicycles in the workplace by identifying a location within the commercial space or garage for bicycle storage.
 - *Safety:* Ensure that bicycle safety strategies are developed along the sides of the property, avoiding conflicts with private cars, transit vehicles and loading vehicles, such as those described in Improvement Measure I-TR-1b, Loading Monitoring and Queue Abatement.
 - *Workshop:* The TDM Coordinator should provide information about and/or host a bike safety workshop conducted by a third party.
 - *Parking:* In addition, the project sponsor should provide the following amounts of bicycle parking above the *Planning Code* requirements:
 - o Eight additional Class 1 bicycle spaces in the ground-floor bicycle room;
 - o Eight additional Class 2 bicycle spaces in the basement level, next to parking stall #8; and
 - o As needed to meet demand, up to 48 Class 1 bicycle spaces in the ground-floor 361-square-foot storage room.
- **Car Share Access:** Ensure that points of access to car share spaces to building and non-building occupants are made convenient (e.g., signage from public right-of-way and internal lobbies).

TDM Program Monitoring

The project sponsor should collect data and make monitoring reports available for review by the Planning Department.

- **Timing:** Monitoring reports should be required to be submitted to City staff biannually (every two years) for four reporting periods. The first monitoring report is required one year after 80 percent occupancy of the units for the new building. Each trip count and survey (see below for definitions) should be completed with 90 days following the end of the applicable biannual reporting period. Each monitoring report should be completed within 180 days following the applicable biannual reporting period.
- **Components:** The monitoring report, including trip counts and surveys, should include the following components OR comparable alternative methodology and components as approved or provided by City staff:
 - *Trip Count and Intercept Survey:* Trip count and intercept survey of persons arriving and leaving the building for no less than two days of the reporting

period between 6 AM and 8 PM. One day should be a Tuesday, Wednesday, or Thursday, and another day should be a Saturday.^{27, 28}

- *Travel Diary or Stated Preference Survey:* The project sponsor should request in writing from City staff a one-week travel diary or stated preference survey (online or paper).²⁹ The one-week travel diary or stated preference survey should be distributed to residents and employees of the building to supplement the trip count and intercept survey data and be deemed complete with at least a 20 percent response rate. To encourage participation, the property manager/coordinator should provide an incentive (e.g., gift card, reduced rent or homeowner association fee, etc.).
- *Property Manager/Coordinator Survey:* The project sponsor should request in writing from City staff a survey (online or paper) that should be completed by property manager/coordinator to document which TDM Program were implemented during the reporting period and obtain basic building information (e.g., percent unit occupancy, off-site parking utilization by occupants of the building, loading frequency, etc.).
- *Travel Demand Information:* The above trip count and survey information should be able to provide travel demand analysis characteristics as outlined in the SF Guidelines.³⁰
- *Assistance and Confidentiality:* City staff will assist the TDM Coordinator on questions regarding the components of the monitoring report and shall ensure that the identity of individual survey responders is protected.

Improvement Measure I-TR-1b: Loading Monitoring and Queue Abatement

The project sponsor, property owner, or official designee of the development, should monitor and ensure recurring vehicle queues do not occur on Turk Street for the proposed off-street parking facility. A vehicle queue is defined as one or more vehicles (destined to the parking facility) blocking any portion of any public street, alley or sidewalk for a consecutive period of three minutes or longer on a daily or weekly basis.

If recurring queuing occurs, the owner/operator of the parking facility should employ abatement methods as needed to abate the queue. Suggested abatement methods include but are not limited to the following: redesign of facility to improve vehicle circulation and/or on-site queue capacity; employment of parking attendants; installation of LOT FULL signs with active management by parking attendants; use of valet parking or other

²⁷ The trip count and intercept survey shall be prepared by a qualified transportation or qualified survey consultant and the methodology shall be approved by the Planning Department prior to conducting the components of the trip count and intercept survey.

²⁸ An example of an appropriate trip count and intercept survey can be found in the University of California, Davis, *California Smart-Growth Trip Generation Rates Study*, March 2013, available online at: <http://ultrans.its.ucdavis.edu/projects/smart-growth-trip-generation>.

²⁹ An example of an appropriate travel diary and stated preference survey distributed are those found in the California Department of Transportation, *2010-2012 California Household Travel Survey Final Report*, June 14, 2013.

³⁰ City and County of San Francisco, *Transportation Impact Analysis Guidelines for Environmental Review*, October 2002, or subsequent updates, if applicable.

space-efficient parking techniques; use of off-site parking facilities or shared parking with nearby uses; use of parking occupancy sensors and signage directing drivers to available spaces; travel demand management strategies such as those listed in Improvement Measure I-TR-1a, including additional bicycle parking, delivery services; and/or parking demand management strategies such as parking time limits, paid parking, time-of-day parking surcharge, or validated parking.

If the Planning Director, or his or her designee, suspects that a recurring queue is present, the Department should notify the property owner in writing. Upon request, the owner/operator should hire a qualified transportation consultant to evaluate the conditions at the site for no less than seven days. The consultant should prepare a monitoring report to be submitted to the Department for review. If the Department determines that a recurring queue does exist, the facility owner/operator should have 90 days from the date of the written determination to abate the queue.

Loading

Pursuant to *Planning Code* Section 153, the proposed project would be required to supply one off-street loading space or two service vehicle spaces as substitutes per *Planning Code* Section 153(a)(6). Per the *Transportation Guidelines*, the proposed project would be expected to generate a total of approximately four daily delivery/service vehicle trips (three residential and one retail), which corresponds to a demand of less than one loading vehicle during the peak hour. The proposed project would provide two off-street loading service vehicles spaces, with an available vertical clearance height of 10 feet, six inches., thus, based on the size of moving vans and trucks expected to be generated by the proposed project and the typical size of other service vehicles (typically between 9-10 feet tall), the proposed loading space would be adequate to accommodate project-related loading activities on site. However, if larger trucks need to access the project site, loading activity could be conducted within convenient on street loading zones. Three yellow curb (commercial loading) zones exist within 150 feet of the project site (two on Mason Street and one on Eddy Street) that could be potentially utilized for the loading and unloading activities on street. During field observations conducted for the transportation study, limited loading/unloading activity was observed in the vicinity of the project site, and it would be expected that the additional loading/unloading activities generated by the proposed project could be conducted within 150 feet of the project site. Therefore, given the limited amount of loading demand during the peak hour of loading activities, the provision of two proposed off-street service vehicles spaces, and the availability of convenient on-street loading zones, the proposed project would not create potentially hazardous conditions or significant delays affecting traffic, transit, bicycles or pedestrians and the impact would be less-than-significant.

Although the proposed project would have less than significant loading impacts, the project sponsor has agreed to the following improvement measure, in addition to Improvement Measure I-TR-1b, that could further reduce these less-than-significant impacts on loading.

Improvement Measure I-TR-1c: Coordination of Move-In and Move-Out and Activities related to Large Trucks

To ensure that residential move-in and move-out activities do not impede traffic flow on Mason Street or Turk Street, move-in and move-out operations, as well as larger deliveries that cannot be accommodated by the off-street service vehicle spaces should be scheduled and coordinated through building management.

Construction

The proposed project's construction activities would last 18 months. During this period, temporary and intermittent transportation impacts would result in additional vehicle trips to the project site from workers and equipment deliveries, but these activities would be limited in duration. Construction material staging and storage, and parking for construction workers would be anticipated to occur on or directly in front of the project site. Construction vehicle trips during peak traffic flow (typically between 4:00 PM and 6:00 PM) would have a greater potential to create conflicts than during non-peak hours because of the greater numbers of vehicles on the streets during the peak hour. However, given the temporary and intermittent nature of the construction activities, the proposed project's construction-related activities would not result in a significant impact to transportation.

Although the proposed project would have less than significant construction impacts, the project sponsor has agreed to the following improvement measures that could further reduce the less-than-significant impacts on construction.

Improvement Measure I-TR-1d: Non-Peak Construction Traffic Hours

To minimize the construction-related disruption of the general traffic flow on adjacent streets during the AM and PM peak periods, the contractor should restrict truck movements and deliveries to, from, and around the project site during peak hours (generally 7 to 9 AM and 4 to 6 PM,) or other times, as determined by San Francisco Municipal Transportation Agency and its Transportation Advisory Staff Committee.

Improvement Measure I-TR-1e: Construction Management

As an improvement measure to reduce potential conflicts between construction activities and pedestrians, transit and automobiles at the Project site, the contractor should add certain measures to the required traffic control plan for Project construction. In addition to the requirements for the construction traffic control plan, the Project should include the following measures:

- Identify construction traffic management best practices in San Francisco, as well as others that, although not being implemented in the City, could provide valuable information for the project. Management practices include, but are not limited to the following:
 - Identifying ways to reduce construction worker vehicle-trips through transportation demand management programs and methods to manage construction worker parking demands.
 - Identifying best practices for accommodating pedestrians, such as temporary pedestrian wayfinding signage or temporary walkways.

- Identifying ways to consolidate truck delivery trips, including a plan to consolidate deliveries from a centralized construction material and equipment storage facility.
- Identifying a route(s) for construction-related trucks to utilize during construction.
- Require consultation with surrounding community, including business and property owners near the project site to assist coordination of construction traffic management strategies as they relate to the needs of other users adjacent to the project site.
- Develop a public information plan to provide adjacent residents and businesses with regularly-updated information regarding project construction activities, peak construction vehicle activities, (e.g. concrete pours), travel lane closures, and other lane closures. Provide a project contact for such construction-related concerns.

Parking

As noted above, Public Resources Code Section 21099(d), effective January 1, 2014, provides that, “aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment.” The proposed project meets each of the above three criteria and thus, this Initial Study does not consider the adequacy of parking in determining the significance of project impacts under CEQA. Therefore, this analysis presents a parking demand, supply and requirements under the Planning Code analysis for informational purposes.

Parking conditions are not static, as parking supply and demand varies from day to day, from day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel. The absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service or other modes (walking and biking), would be in keeping with the City’s “Transit First” policy and numerous *General Plan* Policies, including those in the Transportation Element. The City’s Transit First Policy, established in the City’s Charter Article 8A, Section 8A.115, provides that “parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation.”

The transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking is unavailable. The secondary effects of drivers searching for parking is typically offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area, and thus choose to reach their destination by other modes (e.g., walking, biking, transit, taxi). If this occurs, any secondary environmental impacts that may

result from a shortfall in parking in the vicinity of the proposed project would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise and pedestrian safety analyses, would reasonably address potential secondary effects.

The parking demand for the proposed project was determined based on the methodology presented in the *Transportation Guidelines*. On an average weekday, the demand for vehicular parking would be 75 spaces (69 for residential and six for commercial). The proposed project would provide 55 off-street vehicle parking spaces and 120 off-street bicycle spaces. Thus, as proposed, the project would have an unmet vehicular parking demand of 20 spaces. In addition, the proposed project would displace an existing 54 space parking lot currently occupying the project site. During field observations for the transportation study, it was found that 53 vehicles were parked at the existing parking lot during a typical midday peak period. Thus, it is expected that the proposed project would have an unmet parking demand of about 73 vehicular spaces (20+53).

Based on occupancy surveys conducted for the transportation study, it was found that off-street vehicular parking within the study area is approximately 67 percent occupied during the weekday midday peak period (1:30 to 3:00 PM), with 938 off-street parking spaces available, and approximately 46 percent is occupied during the evening peak period (6:30 to 8:00 PM), with 1,439 off-street-parking spaces available.³¹ Therefore, during the daytime and evening time, off-street vehicular parking could be found by proposed project retail patrons, residential visitors, or Hotel Metropolis valet staff in the project vicinity (surrounded by O'Farrell Street, Jones Street, Mission Street, and Powell Street), if an unmet parking demand would occur. This unmet parking demand would cause an increase in competition for on-street and off-street parking spaces in the proposed project vicinity. However, the project site is well served by public transit and bicycle facilities, as mentioned above in the setting. In recognition of this accessibility, the project site is not required to provide any off-street vehicular parking per *Planning Code C-3* requirements and off-street vehicular parking is limited to a maximum of 82 off-street parking spaces.

It should be noted that the Planning Commission has the discretion to adjust the number of off-street parking spaces included in the proposed project, typically at the time that the project entitlements are sought. In many cases the Planning Commission does not support the parking ratio proposed by the project sponsor and the ratio is substantially reduced. In some cases, particularly when the proposed project is in a transit rich area, the Planning Commission does not support the provision of any off-street parking spaces.

Here, if no off-street parking spaces were provided, the proposed project would have an unmet demand of 128 (75 + 53) vehicular spaces. As mentioned above, the unmet parking demand of 73 spaces could be accommodated by existing facilities, as could the unmet parking demand of 128

³¹ Note: the transportation study also evaluated the occupancy of on-street parking availability nearby. Assuming parking is no longer available on Turk Street on the project site block, on-street parking within the study area is approximately 61 percent occupied during the mid-day peak period, with approximately 179 on-street parking spaces available.

spaces if no off-street parking is approved by the Planning Commission. Therefore, the unmet vehicular parking demand could be met by existing facilities and the project site is well-served by transit and bicycle facilities, as mentioned above.

Impact TR-2: The proposed project would not substantially increase hazards due to a design feature or incompatible uses. (Less than Significant)

The project site exists within a developed block of San Francisco that is currently a surface parking lot and the proposed project would construct a new building consisting of residential and ground-floor commercial uses in its place. No project design features are proposed that would substantially increase traffic-related hazards. In addition, as discussed in Section E.1, Land Use and Land Use Planning, the project does not include incompatible uses. Therefore, transportation hazard impacts due to a design feature or resulting from incompatible uses would be less than significant.

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

Emergency access would remain unchanged from existing conditions. Emergency vehicles would continue to access the project site from either Turk Street or Mason Street. The proposed project would not close off any existing streets or entrances to public uses. Therefore, the proposed project would have a less than significant impact on emergency access to the project site or any surrounding sites.

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

Transit

As discussed above, the project site is well served by local and regional public transit. The proposed project would generate an estimated 91 PM peak-hour transit person-trips which would be dispersed among the various transit lines within the project vicinity. To analyze potential impacts to these transit facilities, the maximum load points near the project site were identified and proposed project-generated transit trips were added and compared to the transit providers' capacity utilization standard. For Muni, the standard is 85 percent and for regional providers, the standard is 100 percent. With implementation of the proposed project, capacity utilization for all Muni screenlines and subcorridors as well as regional screenlines would continue to operate under their providers' capacity utilization standards.

The proposed project would remove an existing curb cut on Turk Street located adjacent to the existing Muni unsheltered bus stop for the 16X – Noriega and 31 – Balboa lines. The new curb cut for the proposed project's new driveway would be located approximately 10 feet nine inches east of the existing Muni bus stop. It is expected that there would be some conflicts with the vehicles exiting the proposed driveway and buses, but not to the extent that the operations of the buses would be significantly affected. In addition, the relocation of the Turk Street driveway would reduce vehicles and transit conflicts between Existing and Existing plus Project conditions. A

high voltage catenary³² exists along Turk Street that provides power for the 31-Balboa trolley coach line. Currently wires are attached to a trolley wire support pole on the Turk Street sidewalk adjacent to the project site. The new driveway would not substantially interfere with the Muni bus operations and the new building would not interfere with the existing trolley wire support pole, and therefore, impacts of proposed project on transit would be less than significant.

Although the proposed project would have less than significant transit impacts, the project sponsor has agreed to the following improvement measure that could be implemented to further reduce these less-than-significant impacts on transit.

Improvement Measure I-TR-4a: Installation of Eyebolts

As an improvement measure to reduce pole clutter on Turk Street, within one year after issuance of a building permit for the subject project, the project sponsor should coordinate with the San Francisco Municipal Transportation Agency (SFMTA) to determine whether it would be appropriate to install eyebolts in the new building to support SFMTA's overhead wire system.

Bicycle Facilities

The proposed project would not substantially interfere with bicycle accessibility to the project site or adjoining areas because no bikeways exist along the project site's adjacent streets. Implementation of the proposed project could encourage more existing visitors to bring their bicycle to the project site as the proposed project would provide 120 new bicycle spaces, exceeding the requirements of Section 155.2 of the *Planning Code*. More persons bringing their bicycles to the project site would not create potentially hazardous conditions for bicyclists because Muni bus stops, sidewalks, and bikeways exist within close proximity of the project site and the roadways near the project site have low to moderate volumes, therefore visitors could walk their bicycles safely along sidewalks from nearby Muni bus stops or bikeways or ride along the roadways to the project site. Therefore, the proposed project would result in less-than-significant impacts related to bicyclists.

Although the proposed project would have less than significant bicycle impacts, the project sponsor may wish to consider the measures in Improvement Measure I-TR-1a that could be implemented to further reduce these less-than-significant impacts on bicycles.

Pedestrian Facilities

Pedestrian trips generated by the proposed project would include walking trips to and from the project site (53 during the PM peak hour) as well as walking trips to and from local transit providers (91 during the PM peak hour). These additional walking trips would not result in substantial overcrowding on nearby public sidewalks.

The proposed project would eliminate existing curb cuts on Mason Street and Turk Street and include a new 14-foot, eight-inch wide curb cut approximately 10 feet nine inches east of the

³² Overhead electric cables that transmit electrical power to the buses.

existing Muni bus stop and the existing curb cut on Turk Street. Pedestrian access to the proposed residential units would be from Mason Street. The proposed project's Mason Street retail space would have pedestrian access from the north side of the new residential lobby. The proposed project's Turk Street retail space would provide pedestrian access from Turk Street adjacent to the western side of the proposed new driveway. The elimination of the curb cut on Mason Street would reduce conflicts between vehicles and pedestrians as compared to existing conditions. The new curb cut on Turk Street would provide vehicular access into the proposed project's at-grade and underground parking garage. During the PM peak hour, this driveway would serve an estimated 34 vehicle trips (20 inbound, 14 outbound), which is equivalent to one vehicle entering or exiting the garage and crossing the sidewalk on average every one to two minutes during the peak hour and less frequently throughout the rest of the day. Given the infrequent number of proposed project-related vehicle trips entering the new driveway and the reduction in curb cut widths at the project site, the proposed project would not create potentially hazardous conditions to pedestrians.

Furthermore, the proposed project is an existing surface parking lot. The proposed project would replace the existing surface parking lot with a new building and would not include any components (e.g., sidewalk narrowing, roadway widening, removal of center medians) that would obstruct pedestrian accessibility to the site and adjoining areas. Therefore, the proposed project would have less-than-significant impacts to pedestrians. In addition, the proposed project would also retain required street lighting and provided new landscaping on Turk Street and Mason Street to be consistent with City's Better Streets Plan, which is a unified set of standards, guidelines, and implementation strategies to govern how the City designs, buildings, and maintains its pedestrian environment.

Although the proposed project would have less than significant pedestrian impacts, the project sponsor has agreed to the following improvement measure that could further reduce the less-than-significant impacts of pedestrians and Improvement Measure I-TR-1b to reduce conflicts with pedestrians.

Improvement Measure I-TR-4b: Pedestrian Improvements

As the improvement measure to improve accessibility for pedestrians in the project vicinity, within one year after issuance of a building permit for the subject project, the project sponsor should contact the San Francisco Municipal Transportation Agency in writing to fund a curb ramp for pedestrians heading south across Turk Street from the west side of Mason Street.

Impact C-TR-1: The proposed project, in combination of past, present, and reasonably foreseeable future project, would result in less-than-significant cumulative impacts to transportation. (Less than Significant)

The transportation study evaluated the transportation impacts of the proposed project under cumulative conditions, as follows.

Traffic

Future year 2040 cumulative traffic conditions were developed in order to assess the cumulative effects of the proposed project and other development that could occur through the year 2040. The 2040 traffic forecast for the study intersections were developed using the San Francisco County Transportation Authority travel demand model runs (CHAMP model version 4.3.0.3), with manual adjustments conducted by the transportation consultant to take into account recent network changes (e.g., Eddy Street and Ellis Street two-way conversions).

As shown in Table 4, in 2040 Cumulative Conditions (which includes the proposed project), with the exception of Mission Street and Fifth Street, the study area intersections would continue to operate at acceptable LOS. Therefore, no cumulative traffic impacts would occur at these intersections. It should be noted that at some of the study intersections the average delay per vehicle would remain constant or slightly decrease with the addition of project-related traffic. LOS is calculated based on an average of the total vehicular delay per approach, weighted by the number of vehicles at each approach. Increases in traffic volumes at an intersection usually result in increases in the overall intersection delay. However, if there are increases in the number of vehicles at movements with low delays, the average weighted delay per vehicle may decrease.

TABLE 4
AM AND PM PEAK HOUR LEVEL OF SERVICE AND DELAY ANALYSIS - CUMULATIVE

Intersection	Existing				2040 Cumulative			
	AM Peak		PM Peak		AM Peak		PM Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
Market/Mason/Turk	11.0	B	11.1	B	10.8	B	14.8	B
Market/6 th /Taylor	31.1	C	25.2	C	39.8	C	22.4	C
Market/5 th	16.0	B	17.0	B	18.6	B	19.8	B
Turk/Jones			13.6	B			13.2	B
Turk/Taylor			17.0	B			16.8	B
Eddy/Taylor			16.2	B			15.7	B
Eddy/Mason			14.4	B			15.3	B
Mission/5th	20.1	C	25.9	C	28.6	C	>80	F (1.5 v/c)

Source: Stantec, 2014

Delay is presented in seconds per vehicle.

LOS = Level of Service

V/C = volume to capacity ratio

Intersections operating at LOS E or LOS F are shown in **bold**.

The increase in traffic volumes at the intersection of Mission Street and Fifth Street is attributed to the general future growth in the area and due to planned network changes in the area. At this intersection during the PM peak hour, the proposed project's contribution on 5th Street is two vehicles on both the southbound and northbound through movements. The proposed project is not expected to add any contribution to the westbound through movement, which is the critical movement. Therefore the contribution to the overall intersection LOS F conditions under 2040 Cumulative conditions would not be cumulatively considerable.

Transit

Future year 2035 cumulative transit conditions were developed in order to assess the cumulative effects of the proposed project and other development that could occur through the year 2035. In 2035 Cumulative Conditions (which includes the proposed project), with the exception of the Geary subcorridor within the Northwest screenline, the capacity utilization for all Muni screenlines and subcorridors as well as regional screenlines would continue to operate under their providers' capacity utilization standards. Therefore, no cumulative transit impacts would occur along these screenlines and subcorridors.

The contribution of the proposed project to 2035 Cumulative PM peak hour transit ridership on the Geary subcorridor was conducted to determine if it would have a significant contribution to this transit ridership. The proposed project would contribute one transit trip to the Geary subcorridor within the Northwest screenline, which would be less than 1.0 percent of total ridership, and would, therefore, not be a cumulatively considerable contribution. Therefore, the proposed project's contribution to the 2035 Cumulative conditions for transit would be less than significant.

Bicycle Facilities

Bicycle circulation impacts by their nature are site-specific and generally do not contribute to impacts from other development projects. Bicycle trips throughout the City may increase under the cumulative scenario due to general growth. Bicycle trips generated by the proposed project in the project site vicinity would include bicycle trips to and from the project site. However, as stated in Existing plus Project Conditions, the proposed project would not create potentially hazardous conditions for bicyclists or otherwise interfere with bicyclist accessibility to the site and adjoining areas. Increases in the number of proposed project vehicle trips could increase some conflicts between bicyclists and the new vehicles (e.g., along Market Street), however these conflicts would not be considered significant. Considering the proposed project's growth with reasonably foreseeable future project and growth throughout the City, the cumulative effects of the proposed project on bicycle facilities would not be considerable. Furthermore, the proposed project would not add a conflict (e.g., new curb cut or loading zone) along a near or long-term project identified in the San Francisco Bicycle Plan. For the above reasons, the proposed project would result in less-than-significant cumulative bicycle-related transportation impacts.

Pedestrian Facilities

Pedestrian circulation impacts by their nature are site-specific and generally do not contribute to impacts from other development projects. Pedestrian trips throughout the City may increase under the cumulative scenario due to general growth. Pedestrian trips generated by the proposed project in the project site vicinity would include walk trips to and from the project site, plus walk trips to and from transit lines. However, as stated in Existing plus Project Conditions, the proposed project would not result in the overcrowding of sidewalks, create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas. Increases in the number of proposed project vehicle trips could increase some conflicts between pedestrians and the new vehicles; however these conflicts would be

similar to existing conditions, given the location of the existing driveway and use as a parking lot. Considering the proposed project's growth cumulatively with reasonably foreseeable future project and growth throughout the City, the cumulative effects of the proposed project would not be considerable. Furthermore, the Better Streets Plan recommends various pedestrian improvements in the project site vicinity that would further reduce the proposed project related pedestrian impacts in future Cumulative Conditions. Various pedestrian improvements for Downtown commercial streets include generous sidewalks, high levels of pedestrian amenities and distinctive, formal design treatments. For the above reasons, the proposed project would result in less-than-significant cumulative pedestrian-related transportation impacts.

Conclusion

As described above, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in cumulatively considerable transportation and circulation impacts.

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

The project site is not located within an airport land use plan area, or in the vicinity of a private airstrip. Therefore, topics 5e and 6f are not applicable.

For a discussion of vibration impacts to nearby historic buildings, refer to topic 3a, above.

Impact NO-1: The proposed project would not result in a substantial permanent increase in ambient noise levels in the project vicinity, expose persons to noise levels in excess of standards established in the local general plan or noise ordinance, or be substantially affected by existing noise levels. (Less than Significant)

Substantial Permanent Increase in Ambient Noise Levels

Ambient noise levels in the vicinity of the project site are typical of noise levels in neighborhoods in San Francisco, which are dominated by vehicular traffic, including trucks, cars, Muni buses, emergency vehicles, and land use activities, such as commercial businesses and periodic temporary construction-related noise from nearby development, or street maintenance. Noises generated by residential uses are common and generally accepted in urban areas. An approximate doubling in traffic volumes in the area would be necessary to produce an increase in ambient noise levels barely perceptible to most people (3 decibel (dB) increase).³³ The proposed project consists of removal of an existing parking lot and new construction of a mixed-use building with up to 109 dwelling units and 2,400 sf of retail space. The proposed project would generate 207 daily vehicle trips near roadways with volumes that would not be doubled by the proposed project's vehicle trips.

The proposed project would include new fixed noise sources that would produce operational noise on the project site. The proposed heating, ventilation, and air conditioning equipment and the backup diesel generator³⁴ would be located on the rooftop. Operation of this equipment would be subject to the City's Noise Ordinance (Article 29 of the San Francisco Police Code). Section 2909 (a)(1) regulates noise from mechanical equipment and other similar sources on residential property. Mechanical equipment operating on residential property must not produce a noise level more than 5 dBA above the ambient noise level at the property boundary. Section 2909 (d) states that no fixed noise source may cause the noise level measured inside any sleeping or living room in a dwelling unit on residential property to exceed 45 dBA between 10 PM and 7 AM or 55 dBA between 7 AM and 10 PM with windows open, except where building ventilation is achieved through mechanical systems that allow windows to remain closed. The proposed project would be subject to and required to comply with the Noise Ordinance.

For the above reasons, the proposed project would not result in a substantial permanent increase in ambient noise levels in the project vicinity.

³³ A decibel is a unit of measurement describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure, which is 20 micropascals.

³⁴ Although backup diesel generators are intended only to be used in periods of power outages, monthly testing of the backup diesel generator would be required.

Expose Persons to Noise Levels in Excess of Standards

Residential uses are considered noise sensitive uses because they may contain noise sensitive receptors, including children and the elderly. Residential development in noisy environments could expose these sensitive receptors to noise levels in excess of established standards. The United States Department of Housing and Urban Development (HUD) has developed minimum national noise standards for land use compatibility. HUD considers noise levels below 65 dB as generally “acceptable,” between 65 dB and 75 dB as “normally unacceptable,” and in excess of 75 dB as “considered unacceptable” for residential land uses.³⁵ The California State Office of Planning and Research (OPR) has developed similar statewide guidelines.³⁶ OPR’s guidelines have largely been incorporated into the Environmental Protection Element of the *General Plan*.³⁷ In addition, the California Building Code and Title 24 of the California Code of Regulations have regulations to limit interior noise levels to 45 dBA L_{dn}.^{38,39} In instances where exterior noise levels exceed 60 L_{dn}, Title 24 requires an acoustical report to be submitted with the building plans describing the noise control measures that have been incorporated into the design of the project to meet the noise requirements.

Ambient noise levels in San Francisco are largely influenced by traffic-related noise. Figure V.G-2 and Figure V.G-3 in the San Francisco 2004 and 2009 Housing Element EIR identifies roadways within San Francisco with traffic noise levels exceeding 60 L_{dn} and 75 L_{dn}, respectively. Most of San Francisco’s neighborhoods are currently affected by traffic noise levels exceeding 60 L_{dn}.

The project site is located along a street with modeled noise levels above 75 dBA L_{dn} (portions of Mason Street, Turk Street, and Market Street) and potential existing noise-generating land uses are nearby. Therefore, a noise analysis was prepared for the residential portion of the proposed project and the results are summarized below.⁴⁰

Noise level measurements were taken at the project site as part of the noise analysis. Long-term measurements (continuous measurements with 15-minute intervals) were made at an elevation 12 feet above the sidewalk adjacent to the project site at Mason Street and Turk Street between February 11th and 14th, 2013. These noise level measurement locations are near the proposed new building’s façade for the residential units. To account for the noise effect of Market Street on

³⁵ Code of Federal Regulations, Title 24, Part 51, Section 51.100 – 51.105.

³⁶ Office of Planning and Research, *State of California General Plan Guidelines*, October 2003.

³⁷ *San Francisco General Plan*, Environmental Protection Element, Policy 11.1.

³⁸ dBA refers to the sound level in decibels as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the response of the human ear and gives good correlation with subjective reactions to noise.

³⁹ L_{dn} refers to the day-night average level or the average equivalent A-weighted sound level during a 24-hour day, obtained after the addition of 10 decibels to sound levels in the night after 10 p.m. and before 7 a.m.

⁴⁰ Charles M. Salter Associates Inc., *Environmental Noise Study, 19-25 Mason Street/2-16 Turk Street, San Francisco, California, CSA Project Number: 13-0056*, March 21, 2013. This document is available for public review at the Planning Department, as part of Case No. 2012.0678E.

certain units of floors 6-12 of the proposed new building, the noise analysis utilized previous noise data collected for Market Street and mathematical modeling for the shielding of surrounding buildings.

The primary noise source in the area is transportation noise. Other potential noise-generating uses in the project vicinity are five bars, three night clubs, 13 restaurants, and three theatres. However, the noise from these uses would not be expected to be above the transportation noise levels. The calculated noise levels for the long-term measurements was 75 dBA L_{dn} at both Mason Street and Turk Street and the calculated maximum noise level measurements was between 71 and 107 dBA L_{max} .

Typical residential building construction will generally provide exterior-to-interior noise level reduction performance of no less than 25 dB when exterior windows and doors are closed. In this case, exterior noise exposure would need to exceed 70 dBA L_{dn} to produce interior noise levels in excess of the City's and Title 24's interior noise criterion (45 dBA L_{dn}). Given the calculated exterior noise level of 75 dBA L_{dn} along both project site frontages, the noise analysis provided recommendations to achieve the interior noise criterion of 45 dBA L_{dn} .

The noise analysis recommendations include, but are not limited to, applying the Sound Transmission Class (STC) requirements listed in Table 5 below for full windows and exterior doors. The proposed project would be subject to and would comply with these recommendations to ensure that Title 24 requirements could be met. Furthermore, through the building permit review process, the Department of Building Inspection (DBI) would ensure that Title 24 requirements would be met. Therefore, the proposed project would not expose persons to noise levels in excess of applicable noise standards.

**TABLE 5
OPERATIONAL NOISE COMPONENTS**

Floor	STC Rating for Full Window and Exterior Doors by Proposed Building Elevation ^{a, b}		
	Mason Street	Turk Street	Rear/Side Yard
2 – 7	35	34	28
8	32 – 36	34	28 – 36
9 – 12	32 – 36	34 – 39	28 – 39

STC = Sound Transmission Class

- STC rating recommended are for full window and exterior door assemblies (glass and frame), rather than just the glass.
- Refer to Figures 3 – 5 in Charles M. Salter Associates Inc., *Environmental Noise Study, 19-25 Mason Street/2-16 Turk Street, San Francisco, California, CSA Project Number: 13-0056*, March 21, 2013 for the exact locations of the STC rating requirements. Note the unit configurations in the plans were slightly revised since the publication of this study, but the plans do not substantially alter the conclusions of the study. This document is available for public review at the San Francisco Planning Department, as part of Case No. 2012.0678E.

Be Substantially Affected by Existing Noise Levels

As stated above, with implementation of the noise analysis specific recommendations, the proposed project would not expose persons to noise levels in excess of applicable noise

standards. Therefore, the proposed project would not be substantially affected by existing noise levels.

For the above reasons, the proposed project would not result in a substantial permanent increase in ambient noise levels in the project vicinity, expose persons to noise levels in excess of standards established in the local general plan or noise ordinance, or be substantially affected by existing noise levels and the impact would be less than significant.

Impact NO-2: During construction, the proposed project would result in a temporary or periodic increase in ambient noise levels and vibration in the project vicinity above levels existing without the project, but any construction-related increase in noise levels and vibration would be considered less than significant. (Less than Significant)

The proposed project's construction activities would last approximately 18 months. Construction noise and vibration would be intermittent and limited to the period of construction. The closest sensitive receptors to construction activities would be residents adjacent to the west, east, and north of the project site. Construction activities would generate noise and vibration that could be considered an annoyance by occupants of nearby properties. Construction activities would require the use of heavy trucks, excavating and grading equipment, material loaders, concrete breakers, pile driving, and other mobile and stationary construction equipment. Construction noise and vibration would fluctuate depending on the construction phase, equipment type and duration of use, and distance between noise source and listener. The greatest construction-generating noise and vibration phases would generally be limited to the initial and middle phases during excavation, new foundation construction, and exterior and façade element construction. In particular, the greatest noise and vibration levels would occur from the installation of cantilever soldier piles for a temporary shoring system to laterally restrain the sides of the excavation for the proposed below-grade parking level of the new building and limit the movement of adjacent improvements. Once the façade is in place, noise from interior finishing would generally be contained within the building envelope and would not be expected to generate excessive noise.

Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the Police Code), which requires noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA at 100 feet from the source. Impact tools must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Section 2908 of the Ordinance prohibits construction work between 8:00 PM and 7:00 AM if noise would exceed the ambient noise level by 5 dBA at the project property line, unless a special permit is authorized by the Director of Public Works. Although construction noise could be annoying at times, it would not be expected to exceed noise levels commonly experienced in this urban environment and would not be considered significant.

The most frequently used method to describe the effect of vibration on the human body is the root mean square (RMS) amplitude. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (Vdb) is commonly used to measure RMS. The decibel

notation acts to compress the range of numbers required to describe vibration.⁴¹ Although it is possible that construction vibration would exceed levels that are considered an annoyance by adjacent residents, these annoyance levels would be temporary (i.e., initial and middle phases of construction and between the hours as directed by the Noise Ordinance) and thus not considered excessive. Because the proposed project would be subject to and would comply with regulations set forth in the Noise Ordinance and would be limited to the duration of proposed project construction, the proposed project would result in a less-than-significant impact regarding temporary increases in noise and vibration levels. Although impacts are considered less-than-significant, the implementation of Mitigation Measures M-CP-1a and M-CP-1b, identified in Section E.3 Cultural and Paleontological Resources, would further reduce these less-than-significant impacts.

Impact C-NO-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would result in less-than-significant cumulative impacts to noise (Less than Significant)

Construction activities in the vicinity of the project site, such as excavation, grading, or construction of other buildings in the area, would occur on a temporary and intermittent basis, similar to the proposed project, would be subject to the Noise Ordinance and thus would not be considered significant. Therefore, cumulative construction-related noise impacts would be less than significant.

The proposed project in combination with other cumulative projects would not result in substantial population growth in the project vicinity. Because neither the proposed project nor the other cumulative impacts in the vicinity are anticipated to result in a doubling of traffic volumes along nearby streets, the project would not contribute considerably to any cumulative traffic-related increases in ambient noise. Moreover, the proposed project's mechanical equipment and occupants would be required to comply with the Noise Ordinance, and therefore would not be expected to contribute to any significant cumulative increases in the ambient noise as a result of the building's mechanical equipment or occupants. Similar to the proposed project, any rooftop mechanical equipment that would be a part of cumulative development would be reviewed by an acoustical specialist and the DBI to ensure that the City's Noise Ordinance standards are met. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable noise impact.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
6. AIR QUALITY—Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐	☐

⁴¹ FTA, May 2006, Table 8-1.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐	☐

Setting

Overview

The Bay Area Air Quality Management District (BAAQMD) is the regional agency with jurisdiction over the nine-county San Francisco Bay Area Air Basin (SFBAAB), which includes San Francisco, Alameda, Contra Costa, Marin, San Mateo, Santa Clara, and Napa Counties and portions of Sonoma and Solano Counties. The BAAQMD is responsible for attaining and maintaining air quality in the SFBAAB within federal and state air quality standards, as established by the federal Clean Air Act (CAA) and the California Clean Air Act (CCAA), respectively. Specifically, the BAAQMD has the responsibility to monitor ambient air pollutant levels throughout the SFBAAB and to develop and implement strategies to attain the applicable federal and state standards. The CAA and the CCAA require plans to be developed for areas that do not meet air quality standards, generally. The most recent air quality plan, the *Bay Area 2010 Clean Air Plan*, was adopted by the BAAQMD on September 15, 2010. The *2010 Clean Air Plan* updates the *Bay Area 2005 Ozone Strategy* in accordance with the requirements of the CCAA to implement all feasible measures to reduce ozone; provide a control strategy to reduce ozone, particulate matter, air toxics, and greenhouse gases in a single, integrated plan; and establish emission control measures to be adopted or implemented. The *2010 Clean Air Plan* contains the following primary goals:

- Attain air quality standards;
- Reduce population exposure and protect public health in the San Francisco Bay Area; and
- Reduce greenhouse gas emissions and protect the climate.

The *2010 Clean Air Plan* represents the most current applicable air quality plan for the SFBAAB. Consistency with this plan is the basis for determining whether the proposed project would conflict with or obstruct implementation of air quality plans.

Criteria Air Pollutants

In accordance with the state and federal CAAs, air pollutant standards are identified for the following six criteria air pollutants: ozone, carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead. These air pollutants are termed criteria air pollutants because they are regulated by developing specific public health- and welfare-based criteria as the basis for setting permissible levels. In general, the SFBAAB experiences low concentrations of most pollutants when compared to federal or state standards. The SFBAAB is designated as either in attainment⁴² or unclassified for most criteria pollutants with the exception of ozone, PM_{2.5}, and PM₁₀, for which these pollutants are designated as non-attainment for either the state or federal standards. By its very nature, regional air pollution is largely a cumulative impact in that no single project is sufficient in size to, by itself, result in non-attainment of air quality standards. Instead, a project's individual emissions contribute to existing cumulative air quality impacts. If a project's contribution to cumulative air quality impacts is considerable, then the project's impact on air quality would be considered significant.⁴³

Land use projects may contribute to regional criteria air pollutants during the construction and operational phases of a project. Table 6 identifies air quality significance thresholds followed by a discussion of each threshold. Projects that would result in criteria air pollutant emissions below these significance thresholds would not violate an air quality standard, contribute substantially to an air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants within the SFBAAB.

TABLE 6
BAAQMD THRESHOLDS OF SIGNIFICANCE FOR CRITERIA AIR POLLUTANTS – PROJECT LEVEL

Pollutant	Construction-Related	Operational-Related	
	Average Daily Emissions	Average Daily Emissions	Maximum Annual Emissions
ROG	54 lbs/day	54 lbs/day	10 tons/year
NO _x	54 lbs/day	54 lbs/day	10 tons/year
PM ₁₀	82 lbs/day (exhaust)	82 lbs/day	15 tons/year
PM _{2.5}	54 lbs/day (exhaust)	54 lbs/day	10 tons/year
PM ₁₀ and PM _{2.5} (fugitive dust)	Construction Dust Ordinance or Other Best Management Practices	None	

Ozone Precursors

As discussed previously, the SFBAAB is currently designated as non-attainment for ozone and particulate matter. Ozone is a secondary air pollutant produced in the atmosphere through a

⁴² "Attainment" status refers to those regions that are meeting federal and/or state standards for a specified criteria pollutant. "Non-attainment" refers to regions that do not meet federal and/or state standards for a specified criteria pollutant. "Unclassified" refers to regions where there is not enough data to determine the region's attainment status for a specified criteria air pollutant.

⁴³ Bay Area Air Quality Management District (BAAQMD), *California Environmental Quality Act Air Quality Guidelines*, May 2011, page 2-1.

complex series of photochemical reactions involving reactive organic gases (ROG) and oxides of nitrogen (NO_x). The potential for a project to result in a cumulatively considerable net increase in criteria air pollutants, which may contribute to an existing or projected air quality violation, are based on the state and federal Clean Air Acts emissions limits for stationary sources. To ensure that new stationary sources do not cause or contribute to a violation of an air quality standard, BAAQMD Regulation 2, Rule 2 requires that any new source that emits criteria air pollutants above a specified emissions limit must offset those emissions. For ozone precursors ROG and NO_x, the offset emissions level is an annual average of 10 tons per year (or 54 pounds (lbs.) per day).⁴⁴ These levels represent emissions by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants.

Particulate Matter (PM₁₀ and PM_{2.5})

The federal New Source Review (NSR) program was created by the federal CAA to ensure that stationary sources of air pollution are constructed in a manner that is consistent with attainment of federal health based ambient air quality standards. For PM₁₀ and PM_{2.5}, the emissions limit under NSR is 15 tons per year (82 lbs. per day) and 10 tons per year (54 lbs. per day), respectively. These emissions limits represent levels at which a source is not expected to have an impact on air quality.⁴⁵ Although the regulations specified above apply to new or modified stationary sources, land use development projects result in ROG, NO_x, PM₁₀ and PM_{2.5} emissions as a result of increases in vehicle trips, architectural coating and construction activities. Therefore, the above thresholds can be applied to the construction and operational phases of land use projects and those projects that result in emissions below these thresholds would not be considered to contribute to an existing or projected air quality violation or result in a considerable net increase in ozone precursors or particulate matter. Due to the temporary nature of construction activities, only the average daily thresholds are applicable to construction phase emissions.

Fugitive Dust

Fugitive dust emissions are typically generated during construction phases. Studies have shown that the application of best management practices (BMPs) at construction sites significantly control fugitive dust.⁴⁶ Individual measures have been shown to reduce fugitive dust by anywhere from 30 to 90 percent.⁴⁷ The BAAQMD has identified a number of BMPs to control fugitive dust emissions from construction activities.⁴⁸ The City's Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) requires a number of fugitive dust control measures to ensure that construction projects do not result in visible dust. The BMPs employed in

⁴⁴ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 17.

⁴⁵ *Ibid*, page 16.

⁴⁶ Western Regional Air Partnership. 2006. *WRAP Fugitive Dust Handbook*. September 7, 2006. This document is available online at http://www.wrapair.org/forums/dejff/dh/content/FDHandbook_Rev_06.pdf, accessed February 16, 2012.

⁴⁷ BAAQMD, October 2009, page 27.

⁴⁸ BAAQMD, May 2011.

compliance with the City's Construction Dust Control Ordinance is an effective strategy for controlling construction-related fugitive dust.

Local Health Risks and Hazards

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

Unlike criteria air pollutants, TACs do not have ambient air quality standards but are regulated by the BAAQMD using a risk-based approach to determine which sources and pollutants to control as well as the degree of control. A health risk assessment is an analysis in which human health exposure to toxic substances is estimated, and considered together with information regarding the toxic potency of the substances, to provide quantitative estimates of health risks.⁴⁹

Air pollution does not affect every individual in the population in the same way, and some groups are more sensitive to adverse health effects than others. Land uses such as residences, schools, children's day care centers, hospitals, and nursing and convalescent homes are considered to be the most sensitive to poor air quality because the population groups associated with these uses have increased susceptibility to respiratory distress or, as in the case of residential receptors, their exposure time is greater than for other land uses. Therefore, these groups are referred to as sensitive receptors. Exposure assessment guidance typically assumes that residences would be exposed to air pollution 24 hours per day, 350 days per year, for 70 years. Therefore, assessments of air pollutant exposure to residents typically result in the greatest adverse health outcomes of all population groups.

Exposures to fine particulate matter (PM_{2.5}) are strongly associated with mortality, respiratory diseases, and lung development in children, and other endpoints such as hospitalization for cardiopulmonary disease.⁵⁰ In addition to PM_{2.5}, diesel particulate matter (DPM) is also of concern. The California Air Resources Board (ARB) identified DPM as a TAC in 1998, primarily based on evidence demonstrating cancer effects in humans.⁵¹ The estimated cancer risk from

⁴⁹ In general, a health risk assessment is required if the BAAQMD concludes that projected emissions of a specific air toxic compound from a proposed new or modified source suggest a potential public health risk. The applicant is then subject to a health risk assessment for the source in question. Such an assessment generally evaluates chronic, long-term effects, estimating the increased risk of cancer as a result of exposure to one or more TACs.

⁵⁰ SFDPH, *Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review*, May 2008.

⁵¹ California Air Resources Board (ARB), Fact Sheet, "The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines," October 1998.

exposure to diesel exhaust is much higher than the risk associated with any other TAC routinely measured in the region.

In an effort to identify areas of San Francisco most adversely affected by sources of TACs, San Francisco partnered with the BAAQMD to inventory and assess air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed the “Air Pollutant Exposure Zone,” were identified based on two health-protective criteria: (1) excess cancer risk from the contribution of emissions from all modeled sources greater than 100 per one million population, and/or (2) cumulative PM_{2.5} concentrations greater than 10 micrograms per cubic meter (µg/m³).

Excess Cancer Risk

The above 100 per one million persons (100 excess cancer risk) criteria is based on United State Environmental Protection Agency (USEPA) guidance for conducting air toxic analyses and making risk management decisions at the facility and community-scale level.⁵² As described by the BAAQMD, the USEPA considers a cancer risk of 100 per million to be within the “acceptable” range of cancer risk. Furthermore, in the 1989 preamble to the benzene National Emissions Standards for Hazardous Air Pollutants (NESHAP) rulemaking,⁵³ the USEPA states that it “...strives to provide maximum feasible protection against risks to health from hazardous air pollutants by (1) protecting the greatest number of persons possible to an individual lifetime risk level no higher than approximately one in one million and (2) limiting to no higher than approximately one in ten thousand [100 in one million] the estimated risk that a person living near a plant would have if he or she were exposed to the maximum pollutant concentrations for 70 years.” The 100 per one million excess cancer cases is also consistent with the ambient cancer risk in the most pristine portions of the Bay Area based on BAAQMD regional modeling.⁵⁴

Fine Particulate Matter

In April 2011, the USEPA published *Policy Assessment for the Particulate Matter Review of the National Ambient Air Quality Standards*, “Particulate Matter Policy Assessment.” In this document, USEPA staff concludes that the current federal annual PM_{2.5} standard of 15 µg/m³ should be revised to a level within the range of 13 to 11 µg/m³, with evidence strongly supporting a standard within the range of 12 to 11 µg/m³. The Air Pollutant Exposure Zone for San Francisco is based on the health protective PM_{2.5} standard of 11 µg/m³, as supported by the USEPA’s Particulate Matter Policy Assessment, although lowered to 10 µg/m³ to account for uncertainty in accurately predicting air pollutant concentrations using emissions modeling programs.

Land use projects within the Air Pollutant Exposure Zone require special consideration to determine whether the project’s activities would expose sensitive receptors to substantial air pollutant concentrations or add emissions to areas already adversely affected by poor air quality.

⁵² BAAQMD, October 2009, page 67.

⁵³ 54 Federal Register 38044, September 14, 1989.

⁵⁴ BAAQMD, October 2009, page 67.

Construction Air Quality Impacts

Project-related air quality impacts fall into two categories: short-term impacts from construction and long-term impacts from project operation. The following addresses construction-related air quality impacts resulting from the proposed project.

Impact AQ-1: The proposed project's construction activities would generate fugitive dust and criteria air pollutants, but would not violate an air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants. (Less than Significant)

Construction activities (short-term) typically result in emissions of ozone precursors and PM in the form of dust (fugitive dust) and exhaust (e.g., vehicle tailpipe emissions). Emissions of ozone precursors and PM are primarily a result of the combustion of fuel from on-road and off-road vehicles. However, ROG's are also emitted from activities that involve painting, other types of architectural coatings, or asphalt paving. The proposed project includes removal of the existing surface parking lot and construction of a new 12-story, 120-foot-tall, 112,600 gsf building. During the project's approximately 18 month construction period, construction activities would have the potential to result in emissions of ozone precursors and PM, as discussed below.

Fugitive Dust

Project-related demolition, excavation, grading, and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. Although there are federal standards for air pollutants and implementation of state and regional air quality control plans, air pollutants continue to have impacts on human health throughout the country. California has found that particulate matter exposure can cause health effects at lower levels than those provided in national standards. The current health burden of particulate matter demands that, where possible, public agencies take feasible available actions to reduce sources of particulate matter exposure. According to the ARB, reducing particulate matter PM_{2.5} concentrations to state and federal standards of 12 µg/m³ in the San Francisco Bay Area would prevent between 200 and 1,300 premature deaths.⁵⁵

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

In response, the San Francisco Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes generally referred hereto as the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) with the intent of reducing the quantity of dust generated during site preparation, demolition and construction work in order to protect the

⁵⁵ ARB, *Methodology for Estimating Premature Deaths Associated with Long-term Exposure to Fine Airborne Particulate Matter in California*, Staff Report, Table 4c, October 24, 2008.

health of the general public and of onsite workers, minimize public nuisance complaints, and to avoid orders to stop work by the DBI.

The Ordinance requires that all site preparation work, demolition, or other construction activities within San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures whether or not the activity requires a permit from DBI. The Director of DBI may waive this requirement for activities on sites less than one half-acre that are unlikely to result in any visible wind-blown dust.

In compliance with the Construction Dust Control Ordinance, the project sponsor and the contractor responsible for construction activities at the project site would be required to use the following practices to control construction dust on the site or other practices that result in equivalent dust control that are acceptable to the Director. Dust suppression activities may include watering all active construction areas sufficiently to prevent dust from becoming airborne; increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water must be used if required by Article 21, Section 1100 et seq. of the San Francisco Public Works Code. If not required, reclaimed water should be used whenever possible. Contractors shall provide as much water as necessary to control dust (without creating run-off in any area of land clearing, and/or earth movement). During excavation and dirt-moving activities, contractors shall wet sweep or vacuum the streets, sidewalks, paths, and intersections where work is in progress at the end of the workday. Inactive stockpiles (where no disturbance occurs for more than seven days) greater than 10 cubic yards or 500 square feet of excavated material, backfill material, import material, gravel, sand, road base, and soil shall be covered with a 10 mil (0.01 inch) polyethylene plastic (or equivalent) tarp, braced down, or use other equivalent soil stabilization techniques.

Compliance with the regulations and procedures set forth by the San Francisco Dust Control Ordinance would ensure that potential dust-related air quality impacts would be reduced to a less-than-significant level.

Criteria Air Pollutants

As discussed above, construction activities would result in emissions of criteria air pollutants from the use of off- and on-road vehicles and equipment. To assist lead agencies in determining whether short-term construction-related air pollutant emissions require further analysis as to whether the project may exceed the criteria air pollutant significance thresholds shown in Table 6, above, the BAAQMD, in its *CEQA Air Quality Guidelines* (May 2011), developed screening criteria. If a proposed project meets the screening criteria, then construction of the proposed project would result in less-than-significant criteria air pollutant impacts. A project that exceeds the screening criteria may require a detailed air quality assessment to determine whether criteria air pollutant emissions would exceed significance thresholds. The *CEQA Air Quality Guidelines*

note that the screening levels are generally representative of new development on greenfield⁵⁶ sites without any form of mitigation measures taken into consideration. In addition, the screening criteria do not account for project design features, attributes, or local development requirements that could also result in lower emissions.

The proposed project includes removal of an existing parking lot and new construction of a mixed-use building with up to 109 dwelling units and 2,400 sf of retail space, which would require the removal and disposal of approximately 7,000 to 8,000 cubic yards of soil during excavation. The size of proposed construction activities would be below the criteria air pollutant screening sizes for high-rise residential (249 units) and strip mall (277,000 sf) and amount of material transport identified in the BAAQMD's *CEQA Air Quality Guidelines*. Thus, quantification of construction-related criteria air pollutant emissions is not required and the proposed project's construction activities would result in a less-than-significant criteria air pollutant impact.

Impact AQ-2: The proposed project's construction exhaust activities would generate toxic air contaminants, including diesel particulate matter, but would not expose sensitive receptors to substantial pollutant concentrations. (Less than Significant)

Off-road equipment (which includes construction-related equipment) is a large contributor to DPM emissions in California, although since 2007, the ARB has found the emissions to be substantially lower than previously expected.⁵⁷ Newer and more refined emission inventories have substantially lowered the estimates of DPM emissions from off-road equipment such that off-road equipment is now considered the sixth largest source of DPM emissions in California.⁵⁸ This reduction in emissions is due, in part, to effects of the economic recession and refined emissions estimation methodologies. For example, revised PM emission estimates for the year 2010, which DPM is a major component of total PM, have decreased by 83 percent from previous 2010 estimates for the SFBAAB.⁵⁹ Approximately half of the reduction can be attributed to the economic recession and approximately half can be attributed to updated assumptions independent of the economic recession (e.g., updated methodologies used to better assess construction emissions).⁶⁰

Additionally, a number of federal and state regulations are requiring cleaner off-road equipment. Specifically, both the USEPA and California have set emissions standards for new off-road equipment engines, ranging from Tier 1 to Tier 4. Tier 1 emission standards were phased in between 1996 and 2000 and Tier 4 Interim and Final emission standards for all new engines would be phased in between 2008 and 2015. To meet the Tier 4 emission standards, engine

⁵⁶ A greenfield site refers to agricultural or forest land or an undeveloped site earmarked for commercial, residential, or industrial projects.

⁵⁷ ARB, *Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements*, p.1 and p. 13 (Figure 4), October 2010.

⁵⁸ *Ibid.*

⁵⁹ ARB, "In-Use Off-Road Equipment, 2011 Inventory Model," Query accessed online, April 2, 2012, http://www.arb.ca.gov/msei/categories.htm#inuse_or_category.

⁶⁰ ARB, October 2010.

manufacturers will be required to produce new engines with advanced emission-control technologies. Although the full benefits of these regulations will not be realized for several years, the USEPA estimates that by implementing the federal Tier 4 standards, NO_x and PM emissions will be reduced by more than 90 percent.⁶¹ Furthermore, California regulations limit maximum idling times to five minutes, which further reduces public exposure to NO_x and PM emissions.⁶²

In addition, construction activities do not lend themselves to analysis of long-term health risks because of their temporary and variable nature. As explained in the BAAQMD's *CEQA Air Quality Guidelines*:

"Due to the variable nature of construction activity, the generation of TAC emissions in most cases would be temporary, especially considering the short amount of time such equipment is typically within an influential distance that would result in the exposure of sensitive receptors to substantial concentrations. Concentrations of mobile-source diesel PM emissions are typically reduced by 70 percent at a distance of approximately 500 feet (ARB 2005). In addition, current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 40, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. This results in difficulties with producing accurate estimates of health risk."⁶³

Therefore, project-level analyses of construction activities have a tendency to produce overestimated assessments of long-term health risks. However, within the Air Pollutant Exposure Zone, as discussed above, additional construction activity may adversely affect populations that are already at a higher risk for adverse long-term health risks from existing sources of air pollution.

The project site is not located within an identified Air Pollutant Exposure Zone. Although on-road heavy-duty diesel vehicles and off-road equipment would be used during the 18-month construction duration, emissions would be temporary and variable in nature and would not be expected to expose sensitive receptors to substantial air pollutants. Furthermore, the proposed project would be subject to, and would comply with, California regulations limiting idling to no more than five minutes, which would further reduce nearby sensitive receptors exposure to temporary and variable DPM emissions. Therefore, construction period TAC emissions would result in a less-than-significant impact to sensitive receptors.

Although the proposed project is not within an Air Pollutant Exposure Zone, the project sponsor has agreed to the following improvement measure which would further reduce these less-than-significant construction impacts.

⁶¹ United State Environmental Protection Agency, "Clean Air Nonroad Diesel Rule: Fact Sheet," May 2004.

⁶² California Code of Regulations, Title 13, Division 3, § 2485.

⁶³ BAAQMD, May 2011, page 8-6.

Improvement Measure I-AQ-2: Construction Emissions Minimization

- A. *Construction Emissions Minimization Plan.* Prior to issuance of a construction permit, the project sponsor should 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 should 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 should meet the following requirements:
 - a) Where access to alternative sources of power are available, portable diesel engines should be prohibited;
 - b) All off-road equipment should have:
 - i. Engines that meet or exceed either U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 2 off-road emission standards, and
 - ii. Engines that are retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy (VDECS).⁶⁴
 - 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 should 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).

⁶⁴ Equipment with engines meeting Tier 4 Interim or Tier 4 Final emission standards automatically meet this requirement, therefore a VDECS would not be required.

- iii. If an exception is granted pursuant to A(1)(c)(ii), the project sponsor should provide the next cleanest piece of off-road equipment as provided by the step down schedules in Table A.

Table A – Off-Road Equipment Compliance Step-down Schedule

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

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.

* Alternative fuels are not a VDECS.

2. The project sponsor should 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 should 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.
 3. The project sponsor should require that construction operators properly maintain and tune equipment in accordance with manufacturer specifications.
 4. The Plan should 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 should indicate the type of alternative fuel being used.
 5. The Plan should be kept on-site and available for review by any persons requesting it and a legible sign should 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 should provide copies of Plan to members of the public as requested.
- B. *Reporting.* Quarterly reports should 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 should include the actual amount of alternative fuel used.

Within six months of the completion of construction activities, the project sponsor should submit to the ERO a final report summarizing construction activities. The final report

should indicate the start and end dates and duration of each construction phase. For each phase, the report should include detailed information required in A(4). In addition, for off-road equipment using alternative fuels, reporting should 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.

Operational Air Quality Impacts

Land use projects typically result in emissions of criteria air pollutants and toxic air contaminants primarily from an increase in motor vehicle trips. However, land use projects may also result in criteria air pollutants and toxic air contaminants from combustion of natural gas, landscape maintenance, use of consumer products, and architectural coating. The following addresses air quality impacts resulting from operation of the proposed project.

Impact AQ-3: During project operations, the proposed project would result in emissions of criteria air pollutants, but not at levels that would violate an air quality standard, contribute to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants. (Less than Significant)

As discussed above in Impact AQ-1, the BAAQMD, in their *CEQA Air Quality Guidelines* (May 2011), has developed screening criteria to determine whether a project requires an analysis of operational-related criteria air pollutants. If all the screening criteria are met by a proposed project, then the lead agency or applicant does not need to perform a detailed air quality assessment.

The proposed project includes removal of an existing parking lot and new construction of a mixed-use building with up to 109 dwelling units and 2,400 sf of retail space. The size of proposed construction activities would be below the criteria air pollutant screening sizes for high-rise residential (510 units) and strip mall (99,000 sf) identified in the BAAQMD's *CEQA Air Quality Guidelines*. Thus, quantification of operational-related criteria air pollutant emissions is not required and the proposed project would not exceed any of the significance thresholds for criteria air pollutants, and would result in a less than significant impact with respect to criteria air pollutants.

Impact AQ-4: During project operations, the proposed project would generate toxic air contaminants, including diesel particulate matter, but would not expose sensitive receptors to substantial pollutant concentrations. (Less than Significant)

Vehicle Trips

Individual projects result in emissions of toxic air contaminants primarily as a result of an increase in vehicle trips. The BAAQMD considers roads with less than 10,000 vehicles per day "minor, low-impact" sources that do not pose a significant health impact even in combination with other nearby sources and recommends that these sources be excluded from the environmental analysis. The proposed project's 207 daily vehicle trips would be well below this

level, therefore an assessment of project-generated TACs resulting from vehicle trips is not required, and the proposed project would not generate a substantial amount of TAC emissions that could affect nearby sensitive receptors.

Backup Emergency Generators

The proposed project would include a backup emergency generator on the roof. Emergency generators are regulated by the BAAQMD through its New Source Review (Regulation 2, Rule 5) permitting process. The project applicant would be required to obtain applicable permits to operate an emergency generator from the BAAQMD. Although emergency generators are intended only to be used in periods of power outages, monthly testing of the generator would be required. The BAAQMD limit testing to no more than 50 hours per year. Additionally, as part of the permitting process, the BAAQMD limits the excess cancer risk from any facility to no more than ten per one million population and requires any source that would result in an excess cancer risk greater than one per one million population to install Best Available Control Technology for Toxics. Compliance with the BAAQMD permitting process would ensure that project-generated TAC emissions would not expose sensitive receptors to substantial air pollutant concentrations, and TAC emissions would be less than significant.

Although the proposed project is not within an Air Pollutant Exposure Zone, the project sponsor has agreed to the following improvement measure which would further reduce these less-than-significant operational impacts.

Improvement Measure I-AQ-4a: Best Available Control Technology for Diesel Generators

All diesel generators should have engines that (1) meet Tier 4 Final or Tier 4 Interim emission standards, or (2) meet Tier 2 emission standards and are equipped with a California Air Resources Board (ARB) Level 3 Verified Diesel Emissions Control Strategy (VDECS).

Siting Sensitive Land Uses

The proposed project would include new residential receptors and is therefore considered a sensitive land use for purposes of air quality evaluation. As discussed above, San Francisco, in partnership with the BAAQMD, has modeled and assessed air pollutant impacts from mobile, stationary and area sources within the City. This assessment has resulted in the identification of the Air Pollutant Exposure Zone. The proposed project would site sensitive land uses, but not within an Air Pollutant Exposure Zone, therefore, the proposed project would result in a less-than-significant impact with respect to exposing sensitive receptors to substantial levels of air pollution.

In addition, although the proposed project is not within an Air Pollutant Exposure Zone, the proposed project is subject to the existing Article 38 of the Health Code (Potential Roadway Exposure Zone), which requires the project sponsor to install an enhanced ventilation system.⁶⁵

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

Typical odor sources of concern include wastewater treatment plants, sanitary landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing facilities, fiberglass manufacturing facilities, auto body shops, rendering plants, and coffee roasting facilities. During construction, diesel exhaust from construction equipment would generate some odors. However, construction-related odors would be temporary and would not persist upon project completion. The project site is not substantially affected by sources of odors. Additionally, the proposed project includes construction of a new mixed-use building with up to 109 dwelling units and 2,400 sf of retail space and would therefore not create a significant source of new odors. Therefore, odor impacts would be less than significant.

Impact AQ-6: The proposed project would not conflict with or obstruct implementation of the Bay Area 2010 Clean Air Plan. (Less than Significant)

The most recently adopted air quality plan for the SFBAAB is the *2010 Clean Air Plan*. The *2010 Clean Air Plan* is a road map that demonstrates how the San Francisco Bay Area will achieve compliance with the state ozone standards as expeditiously as practicable and how the region will reduce the transport of ozone and ozone precursors to neighboring air basins. In determining consistency with the *2010 Clean Air Plan*, this analysis considers whether the project would: (1) support the primary goals of the *2010 Clean Air Plan*, (2) include applicable control measures from the Clean Air Plan (CAP), and (3) avoid disrupting or hindering implementation of control measures identified in the CAP.

The primary goals of the *2010 Clean Air Plan* are to: (1) reduce emissions and decrease concentrations of harmful pollutants, (2) safeguard the public health by reducing exposure to air pollutants that pose the greatest health risk, and (3) reduce greenhouse gas emissions. To meet the primary goals, the *2010 Clean Air Plan* recommends specific control measures and actions. These control measures are grouped into various categories and include stationary and area source measures, mobile source measures, transportation control measures, land use measures, and energy and climate measures. The *2010 Clean Air Plan* recognizes that to a great extent, community design dictates individual travel mode, and that a key long-term control strategy to reduce emissions of criteria pollutants, air toxics, and greenhouse gases from motor vehicles is to channel future Bay Area growth into vibrant urban communities where goods and services are close at hand, and people have a range of viable transportation options. To this end, the *2010 Clean Air Plan* includes 55 control measures aimed at reducing air pollution in the SFBAAB.

The measures most applicable to the proposed project are transportation control measures and energy and climate control measures. The proposed project's impact with respect to Greenhouse

⁶⁵ San Francisco Department of Public Health, Environmental Health, "19-25 Mason St., 2-16 Turk St. Air Quality Assessment," February 14, 2013. This document is on file and available for public review at the San Francisco Planning Department, as part of Case File 2012.0678E.

Gases (GHGs) is discussed in Section E.7, Greenhouse Gas Emissions, which demonstrates that the proposed project would comply with the applicable provisions of the City's Greenhouse Gas Reduction Strategy.

The compact development of the proposed project and high availability of viable transportation options ensure that residents could bicycle, walk, and ride transit to and from the project site instead of taking trips via private automobile. These features ensure that the project would avoid substantial growth in automobile trips and vehicle miles traveled. The proposed project's anticipated 207 net new vehicle trips would result in a negligible increase in air pollutant emissions. Furthermore, the proposed project would be generally consistent with the *San Francisco General Plan*, as discussed in Section C, Compatibility with Existing Zoning and Plans. Transportation control measures that are identified in the *2010 Clean Air Plan* are implemented by the *San Francisco General Plan* and the *Planning Code*, for example, through the City's Transit First Policy, bicycle parking requirements, and transit impact development fees. Compliance with these requirements would ensure the project includes relevant transportation control measures specified in the *2010 Clean Air Plan*. Therefore, the proposed project would include applicable control measures identified in the CAP to meet the CAP's primary goals.

Examples of a project that could cause the disruption or delay of *2010 Clean Air Plan* control measures are projects that would preclude the extension of a transit line or bike path, or projects that propose excessive parking beyond parking requirements. The proposed project would construct a new mixed-use building in a dense, walkable urban area near a concentration of regional and local transit service. It would not preclude the extension of a transit line or a bike path or any other transit improvement, and thus would not disrupt or hinder implementation of control measures identified in the CAP.

For the reasons described above, the proposed project would not interfere with implementation of the *2010 Clean Air Plan*, and because the proposed project would be consistent with the applicable air quality plan that demonstrates how the region will improve ambient air quality and achieve the state and federal ambient air quality standards, this impact would be less than significant.

Impact C-AQ-1: The proposed project, in combination with past present, present, and reasonably foreseeable future development in the project area would result in less-than-significant cumulative impacts to air quality. (Less than Significant)

As discussed above, regional air pollution is by its very nature largely a cumulative impact. Emissions from past, present, and future projects contribute to the region's adverse air quality on a cumulative basis. No single project by itself would be sufficient in size to result in regional nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulative adverse air quality impacts.⁶⁶ The project-level thresholds for criteria air pollutants are based on levels by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants.

⁶⁶ BAAQMD, May 2011, page 2-1.

Therefore, because the proposed project's construction (Impact AQ-1) and operational (Impact AQ-4) emissions would not exceed the project-level thresholds for criteria air pollutants, the proposed project would not be considered to result in a cumulatively considerable contribution to regional air quality impacts.

Although the project would a new sensitive land use (i.e., residential) and new sources of TACs (e.g., new vehicle trips and backup emergency generator), the project site is not located within an Air Pollutant Exposure Zone. The project's incremental increase in localized TAC emissions resulting from construction, new vehicle trips, and a new source would be minor and would not contribute substantially to cumulative TAC emissions that could affect nearby or proposed sensitive land uses. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable air quality impact.

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

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

The BAAQMD has prepared guidelines and methodologies for analyzing GHGs. These guidelines are consistent with CEQA Guidelines Sections 15064.4 and 15183.5 which address the analysis and determination of significant impacts from a proposed project's GHG emissions. CEQA Guidelines Section 15064.4 allows lead agencies to rely on a qualitative analysis to describe GHG emissions resulting from a project. CEQA Guidelines Section 15183.5 allows for public agencies to analyze and mitigate GHG emissions as part of a larger plan for the reduction of greenhouse gases and describes the required contents of such a plan. Accordingly, San Francisco has prepared *Strategies to Address Greenhouse Gas Emissions* (GHG Reduction Strategy)⁶⁷ which presents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco's Qualified GHG Reduction Strategy in compliance with

⁶⁷ San Francisco Planning Department, *Strategies to Address Greenhouse Gas Emissions in San Francisco*, 2010. The final document is available online at: <http://www.sf-planning.org/index.aspx?page=2627>.

CEQA guidelines. The actions outlined in the strategy have resulted in a 14.5 percent reduction in GHG emissions in 2010 compared to 1990 levels, exceeding the year 2020 reduction goals outlined in the BAAQMD's *2010 Clean Air Plan*, Executive Order S-3-05,⁶⁸ and Assembly Bill 32 (also known as the Global Warming Solutions Act.)^{69,70}

Given that the City's local greenhouse gas reduction targets are more aggressive than the State and Region's 2020 GHG reduction targets and consistent with the long-term 2050 reduction targets, the City's Greenhouse Gas Reduction Strategy is consistent with the goals of EO S-3-05, AB 32, and the *2010 Clean Air Plan*. Therefore, proposed projects that are consistent with the City's Greenhouse Gas Reduction Strategy would be consistent with the goals of EO S-3-05, AB 32, and the *2010 Clean Air Plan*, would not conflict with these plans, and would therefore not exceed San Francisco's applicable GHG threshold of significance.

The following analysis of the proposed project's impact on climate change focuses on the project's contribution to cumulatively significant GHG emissions. Given the analysis is in a cumulative context, this section does not include an individual project-specific impact statement.

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

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

The proposed project would increase the activity onsite through removal of an existing parking lot and new construction of a mixed-use building with up to 109 dwelling units and 2,400 sf of retail space. Therefore, the proposed project would contribute to annual long-term increases in GHGs as a result of increased vehicle trips (mobile sources) and residential operations that result in an increase in energy use, water use and wastewater treatment, and solid waste disposal. Construction activities would also result in temporary increases in GHG emissions.

The proposed project would be subject to and required to comply with several regulations adopted to reduce GHG emissions as identified in the GHG Reduction Strategy. The regulations that are applicable to the proposed project include the Commuter Benefits Ordinance, Emergency

⁶⁸ Executive Order S-3-05 sets forth a series of target dates by which statewide emissions of GHGs need to be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels (approximately 457 million MTCO₂E); by 2020, reduce emissions to 1990 levels (estimated at 427 million MTCO₂E); and by 2050 reduce emissions to 80 percent below 1990 levels (approximately 85 million MTCO₂E).

⁶⁹ San Francisco Department of Environment (DOE), *San Francisco Climate Action Strategy, 2013 Update*.

⁷⁰ The *2010 Clean Air Plan*, Executive Order S-3-05, and Assembly Bill 32 goals, among others, are to reduce GHGs in the year 2020 to 1990 levels.

Ride Home Program, Bicycle Parking requirements, Street Tree Planting Requirements for New Construction, Mandatory Recycling and Composting Ordinance, SF Green Building Requirements for Energy Efficiency, and Stormwater Management.

These regulations, as outlined in San Francisco's *Strategies to Address Greenhouse Gas Emissions*, have proven effective as San Francisco's GHG emissions have measurably reduced when compared to 1990 emissions levels, demonstrating that the City has met and exceeded EO S-3-05, AB 32, and the 2010 *Clean Air Plan* GHG reduction goals for the year 2020. The proposed project was determined to be consistent with San Francisco's GHG Reduction Strategy.⁷¹ Other existing regulations, such as those implemented through AB 32, will continue to reduce a proposed project's contribution to climate change. Therefore, the proposed project's GHG emissions would not conflict with state, regional, and local GHG reduction plans and regulations, and thus the proposed project's contribution to GHG emissions would not be cumulatively considerable or generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment. As such, the proposed project would result in a less-than-significant impact with respect to GHG emissions.

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

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

A wind assessment and study were prepared for the proposed project.⁷² The following discussion relies on the information provided in those reports.

Average wind speeds in San Francisco are the highest in the summer and lowest in winter. However, the strongest peak winds occur in winter. Throughout the year the highest wind speeds occur in mid-afternoon and the lowest in the early morning. West-northwest, west, northwest, and west-southwest are the most frequent and strongest of primary wind directions during all seasons (referred to as prevailing winds).

⁷¹ San Francisco Planning Department, "Greenhouse Gas Analysis: Compliance Checklist," April 14, 2014. This document is on file and available for public review at the San Francisco Planning Department, as part of Case File 2012.0678E.

⁷² RWDI, *Mason and Turk Street Project, San Francisco, CA, Pedestrian Wind Assessment*, RWDI #1301364, June 3, 2013. RWDI, *Mason and Turk Street Project, San Francisco, California, Pedestrian Wind Study*, RWDI #1301364, December 10, 2013. These documents are on file and available for public review at the San Francisco Planning Department, as part of Case File 2012.0678E.

San Francisco Planning code Section 148, Reduction of Ground-level Wind Currents in C-3 Districts, outlines wind reduction criteria for projects in C-3 Districts. The project site is within a C-3 District and the proposed project is subject to these criteria. The *Planning Code* sets criteria for both comfort and hazards and requires buildings to be shaped so as not to cause ground-level wind currents to exceed these criteria. However, for the purposes of evaluating impacts under CEQA, the analysis uses the hazard criterion to determine whether the proposed project would alter wind in a manner that substantially affects public areas.

The *Planning Code* pedestrian comfort criterion of 11 miles per hour (mph) is based on wind speeds measured and averaged over a period of one minute. In contrast, the *Planning Code* wind hazard criterion of 26 mph is defined by a wind speed that is measured and averaged over a period of one hour. When stated on the same time basis as the comfort criterion wind speed, the hazard criterion wind speed (26 mph averaged over one hour) is equivalent to a one-minute average of 36 mph, which is a speed where wind gusts can blow people over and are therefore hazardous. As stated above, the analysis uses the hazard criterion to determine significant effects under CEQA. In addition, the proposed project's effects related to the comfort criterion are presented for informational purposes.

A building taller than its immediate surrounding will intercept winds and deflect them down to the ground level, causing wind flow accelerations around building corners. When the gap between two buildings is aligned with the prevailing winds, high wind activity is expected along the gap. The project site is currently a surface parking lot that surrounds the nine-story Hotel Metropolis. Existing buildings in the surrounding area are shorter than the Hotel Metropolis and are generally two-to-eight stories tall. Given that the Hotel Metropolis is taller than the surroundings to the west and north, the prevailing winds are deflected down to the surface parking lot. The downwashed flows are then channeled between the existing buildings, resulting in increased wind speeds around the corners of the Hotel Metropolis and on sidewalks along both Mason Street and Turk Street.

Wind tunnel testing was conducted at 41 wind speed sensor locations under Existing Conditions within a 1,200 foot radius of the project site, at a pedestrian height of approximately five feet. The results of the wind tunnel testing indicate that no sensor locations exceed the hazard criterion under Existing Conditions. For informational purposes, the results of the wind tunnel testing indicate that 19 of the 41 sensor locations exceed the *Planning Code's* 11 mph pedestrian comfort criterion under Existing Conditions. Wind speeds of 10 percent exceedance (i.e., the wind speed exceeded 10 percent of time) are 11.6 mph on average over 41 sensor locations. The nearest comfort criterion exceedance to the project site is adjacent to the existing curb cut for the project site at Turk Street. All four corners at the intersection of Mason Street and Eddy Street exceed the comfort criterion. In addition, most sensor locations along Market Street exceed the comfort criterion, with the highest wind speeds modeled along the south side of Market Street, southwest of the intersection of Market Street and Fifth Street.

The proposed project would include removal of the existing surface parking lot and construction of a new 12-story, 120-foot-tall (131-to-140-foot tall with above-roof structures), 112,600 gsf

building on the entirety of the existing surface parking lot. The proposed project would include two common open spaces, at the podium level and rooftop. Wind tunnel testing was conducted for Existing plus Project Conditions with an additional four wind speed sensor locations at the proposed open space locations. The results of the wind tunnel testing indicate that the proposed project would not cause a sensor location to exceed the hazard criterion. Therefore, the proposed project would not alter wind in a manner that substantially affects public areas and impacts are considered less than significant.

For informational purposes, the results of the wind tunnel testing indicate that 24 of the 41 sensor locations would exceed the *Planning Code's* 11 mph pedestrian comfort criterion under Existing plus Project Conditions, an increase of five sensor locations. Wind speeds of 10 percent exceedance would be 11.4 mph on average over 45 sensor locations, similar to Existing Conditions. No sensor locations adjacent to the project site would exceed the comfort criterion as wind speeds would lessen at these locations compared to Existing Conditions. Additional wind comfort criterion exceedances compared to Existing Conditions would occur along the east side of Mason Street, between Turk Street and Eddy Street (where the greatest increases from the proposed project would occur at two mph), and at the proposed outdoor common open spaces, one location at the podium level and two locations at the rooftop. The highest wind speeds would continue to occur along the south side of Market Street, southwest of the intersection of Market Street and Fifth Street.

While the proposed project's wind hazard impacts would be less than significant, the project sponsor has agreed to the following improvement measure that could improve usability of the new rooftop deck on the new building by reducing wind exposure.

Improvement Measure I-WS-1: Wind Reduction on New Rooftop Deck

To reduce wind and improve usability on the new rooftop deck, the project sponsor should provide wind screens or landscaping along the north and west perimeter of the new rooftop deck. Suggestions include *Planning Code* compliant porous materials or structures (vegetation, hedges, screens, latticework, perforated or expanded metal) as opposed to a solid surface.

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

Section 295 of the *Planning Code* was adopted in response to Proposition K (passed November 1984) in order to protect certain public open spaces under the jurisdiction of the Recreation and Park Commission from shadowing by new and altered structures during the period between one hour after sunrise and one hour before sunset, year round. Section 295 restricts new shadow upon public open spaces under the jurisdiction of the Recreation and Park Commission by any structure exceeding 40 feet in height unless the Planning Commission finds the shadow to be an insignificant effect.

The nearest public open spaces to the project site are Father Alfred E. Boeddeker Park, approximately 0.2 mile northwest of the project site, Hallidie Plaza, approximately 200 feet east of

the project site, and Mint Plaza, approximately 0.1 mile southeast of the project site. Of these public open spaces, only Father Alfred E. Boeddeker Park is protected by Section 295.

The proposed project would include removal of the existing surface parking lot and construction of a new 12-story, 120-foot-tall (131-to-140-foot tall with above-roof structures), 112,600 gsf building. The preliminary shadow fan prepared by the Planning Department found that the proposed project's shadow could reach all three of the aforementioned public open spaces.⁷³ However, the preliminary shadow fan assumes no other buildings are present and do not take into account topography. Therefore, a more detailed shadow study was conducted that includes intervening buildings.⁷⁴

The results of the shadow study indicate that the proposed project would not result in any net new shadows on the aforementioned public open spaces. The proposed project's shadow would not extend to Father Alfred E. Boeddeker Park, after taking into account topography. Thus, the proposed project is compliance with Section 295. The proposed project's shadow would extend to locations within Hallidie Plaza and Mint Plaza a few times a year. However, during these times, shadow at the locations on these public open spaces is already present. Therefore, the proposed project would not add any net new shadow on public open spaces.

No privately owned, publicly accessible open spaces exist within reach of the proposed project's shadow.

The proposed project would cast net new shadow on nearby sidewalks including those along Taylor Street, Eddy Street, Turk Street, Mason Street, and Market Street, at certain times of day throughout the year. Many of the sidewalks in this part of San Francisco are already shadowed for much of the day by densely developed, multi-story buildings, and additional project-related shadow would be temporary in nature and would not substantially affect the use of the sidewalks.

For the above reasons, the proposed project would not create new shadow that substantially affects outdoor recreation facilities or other public areas and impacts are considered less-than-significant.

The shadow analysis also found the proposed project would shade portions of nearby private property at times within the project vicinity. Although occupants of nearby property may regard the increase in shadow as undesirable, the limited increase in shading of private properties as a result of the proposed project would not be considered a significant impact under CEQA.

⁷³ San Francisco Planning Department, "19-25 Mason Street (2-16 Turk Street) – PPA Shadow Analysis," March 12, 2013. This document is on file and available for public review at the San Francisco Planning Department, as part of Case File 2012.0678U.

⁷⁴ Loisos + Ubbelohde, *Shadow Study, 19-25 Mason Street/2-16 Turk Street, San Francisco, CA 94102*, June 2013. This document is on file and available for public review at the San Francisco Planning Department, as part of Case File 2012.0678E.

Impact C-WS-1: The proposed project, in combination with other past, present, or reasonably foreseeable future projects, would result in less-than-significant cumulative impacts to wind. (Less than Significant)

Wind tunnel testing was conducted for Cumulative Conditions (which includes the proposed project) at 45 sensor locations, taking into account the proposed 5M project (925 Mission Street)⁷⁵ and the proposed 229 Ellis Street project.⁷⁶ The results of the wind tunnel testing indicate that 25 of the 41 sensor locations would exceed the *Planning Code's* 11 mph pedestrian comfort criterion under Cumulative Conditions, an increase of six sensor locations compared to Existing Conditions. Wind speeds of 10 percent exceedance would be 11.6 mph on average over 45 sensor locations, the same as Existing Conditions. No sensor locations adjacent to the project site would exceed the comfort criterion as wind speeds would lessen at these locations compared to Existing Conditions. Additional wind comfort criterion exceedances compared to Existing Conditions would occur along the east side of Mason Street, between Turk Street and Eddy Street; one location along the south side of Eddy Street, between Taylor Street and Mason Street; and at the proposed outdoor common open spaces, one location at the podium level and two locations at the rooftop. The highest wind speeds would continue to occur along the south side of Market Street, southwest of the intersection of Market Street and Fifth Street. Under Cumulative Conditions, no sensor locations would exceed the hazard criterion. Therefore, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable wind impact.

Impact C-WS-2: The proposed project, in combination with other past, present, or reasonably foreseeable future projects, would result in less-than-significant cumulative impacts to shadow. (Less than Significant)

Based on the fact that the proposed project would not cast new shadows on a public open space, it would not contribute to a cumulative shadow impact on the public open spaces in the project vicinity. Future projects would be subject to *Planning Code* Section 295 and other controls to avoid substantial net new shading of public open space. Thus the proposed project, in combination with other past, present, and reasonably foreseeable future projects proposed in the vicinity, would not result in a cumulatively considerable shadow impact.

⁷⁵ The proposed project would include up to 1.85 million gsf of new and existing office, residential, cultural, educational, and retail uses, located approximately 800 feet southeast of the project site at a four-acre site west of Fifth Street and between Mission Street and Howard Street. This proposed project is on file and available for public review at the San Francisco Planning Department, as part of Case File 2011.0409E.

⁷⁶ The proposed project would include the change of use (18 dwelling units over 6,000 sf commercial uses), interior structural improvements, façade rehabilitation, and a three-story addition to an existing four-story, vacant building. This proposed project is on file and available for public review at the San Francisco Planning Department, as part of Case File 2009.0343E.

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

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

The project site is identified within a location of the City with a “High Need” for open space, defined as areas with high population densities, high concentrations of seniors and youth, and lower income populations that are located outside of existing parking service areas.⁷⁷ The nearest neighborhood parks to the project site are the Father Alfred E. Boeddeker Park, which is a one acre community park approximately 0.2 miles walking northwest of the project site, and the Turk and Hyde Mini Park, which is a 0.1 acre park primarily for preschoolers approximately 0.3 miles walking west of the project site. The proposed project would add approximately 264 residents to the project area, which would increase the demand for parks or other recreational facilities. The proposed project would provide approximately 6,200 sf of common open space and approximately 2,100 sf of private open space for project residents. Although new residents may utilize parks and recreational spaces in the vicinity of the site and the existing open space in the project site vicinity is limited, the use would likely be modest based on the size of projected population increase in comparison to existing populations within the Downtown/Civic Center neighborhood and Census Tract 125.01, as discussed in Section E.2 Population and Housing. Therefore, it is unlikely that substantial physical deterioration would occur. In addition, the proposed project would not substantially increase demand for or use of citywide/regional facilities such as Golden Gate Park or other recreational facilities such as Tenderloin Recreation Center. Therefore, the proposed project would not be expected to create a substantial contribution to the existing demand for existing neighborhood parks or other recreational facilities in this area and this impact would be less than significant.

Impact RE-2: The proposed project would not require the construction of recreational facilities that may have an adverse physical effect on the environment. (Less than Significant)

The proposed project would provide some open space on site for the residents, in the form of a rooftop deck and common rear yard space. Residents at the project site would be within walking distance of the above-noted Father Alfred E. Boeddeker Park and Turk and Hyde Mini Park.

⁷⁷ *San Francisco General Plan, Recreation & Open Space Element, April 2014, Map 7.*

Although the proposed project would introduce a new permanent population to the project site, the number of new residents projected would not substantially increase demand for or use of either neighborhood parks and recreational facilities (discussed above) or citywide/regional facilities such as Golden Gate Park such that any increased user demand would require the construction of new recreational facilities or the expansion of existing facilities. Therefore, the project would not result in the construction of recreational facilities that would themselves have physical environmental impacts.

Impact RE-3: The proposed project would not physically degrade existing recreational facilities. (Less than Significant)

The proposed project would not result in the physical alteration of any recreational resource within the vicinity of the project site or in the City as a whole. The proposed project would include removal of the existing surface parking lot and construction of a new 12-story, 120-foot-tall, 112,600 gsf building. Therefore, the proposed project would not physically degrade existing recreational facilities and this impact would be less than significant.

Impact C-RE-1: The proposed project in combination with past, present, and reasonably foreseeable future projects in the vicinity, would result in less-than-significant cumulative impacts to recreation. (Less than Significant)

The use of recreational facilities in the vicinity of the project site is not expected to noticeably increase as a result of the proposed project. No other development in the project vicinity would contribute substantially to recreational cumulative effects. Additionally, future developments would be subject to *Planning Code* open space requirements. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable recreation impact.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
10. UTILITIES AND SERVICE SYSTEMS— Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐	☐

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?	☐	☐	☒	☐	☐
e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐	☐

Impact UT-1: Implementation of the proposed project would not exceed wastewater treatment requirements, exceed the capacity of the wastewater treatment provider serving the project site, or result in the construction of new or expansion of existing wastewater treatment or stormwater drainage facilities. (Less than Significant)

Proposed project-related wastewater and stormwater would flow to the City's combined stormwater and sewer system and would be treated to standards contained in the City's National Pollutant Discharge Elimination System (NPDES) Permit for the Southeast Water Pollution Control Plant prior to discharge into the Bay. The NPDES standards are set and regulated by the San Francisco Bay Area Regional Water Quality Control (RWQCB), therefore, the proposed project would not conflict with RWQCB requirements.

Implementation of the proposed project would incrementally increase wastewater flows from the project site due to the introduction of approximately 264 residents and seven employees. The proposed project would incorporate water-efficient fixtures, as required by Title 24 of the California Code of Regulations and the City's Green Building Ordinance. Compliance with these regulations would reduce wastewater flows and the amount of potable water used for building functions. The SFPUC's infrastructure capacity plans account for projected population and employment growth. The incorporation of water-efficient fixtures into new development is also accounted for by the SFPUC because widespread adoption can lead to more efficient use of existing capacity. Therefore, this increase in population would not require expansion of wastewater treatment facilities.

The existing project site is completely covered by a surface parking lot. The proposed building footprint would also completely cover the project site; thus, project implementation would not result in an increase in impervious surfaces. Compliance with the City's Stormwater Management Ordinance (Ordinance No. 83-10) requires the proposed project to maintain, reduce, or eliminate the existing volume and rate of stormwater runoff discharged from the project site. To achieve this, the proposed project would implement and install appropriate stormwater

management systems that retain runoff onsite, promote stormwater reuse, and limit (or eliminate altogether) site discharges entering the combined sewer collection system. This in turn would limit the incremental demand on both the collection system and wastewater facilities resulting from stormwater discharges, and minimize the potential for upsizing or constructing new facilities. Therefore, the proposed project would not substantially increase the demand for wastewater or stormwater treatment and would result in a less-than-significant impact.

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

The proposed project would increase the amount of water required to serve the project site. All large-scale projects in California subject to CEQA are required to obtain an assessment from a regional or local jurisdiction water agency to determine the availability of a long-term water supply sufficient to satisfy project-generated water demand under Senate Bill 610 and Senate Bill 221.45. Under Senate Bill 610, a Water Supply Assessment (WSA) is required if a proposed project is subject to CEQA in an Environmental Impact Report or Negative Declaration and is any of the following: (1) a residential development of more than 500 dwelling units; (2) a shopping center of business employing more than 1,000 persons or having more than 500,000 square feet of floor space; (3) a commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space; (4) a hotel or motel with more than 500 rooms; (5) an industrial or manufacturing establishment housing more than 1,000 persons or having more than 650,000 square feet or 40 acres; (6) a mixed-use project containing any of the foregoing; or (7) any other project that would have water demand at least equal to a 500 dwelling unit project. The proposed project would not exceed any of these thresholds and therefore would not be required to prepare a WSA.

In June 2011, the SFPUC adopted a resolution finding that the SFPUC's 2010 Urban Water Management Plan (UWMP) adequately fulfills the requirements of the water assessment for urban water suppliers. The UWMP uses year 2035 growth projections prepared by the Planning Department and ABAG to estimate future water demand. The proposed project is within the demand projections of the UWMP and would not exceed the water supply projections.

The proposed project would include removal of the existing surface parking lot and construction of a new 12-story, 120-foot-tall, 112,600 gsf building. Although the total amount of water demand would increase at the project site, the proposed building would be designed to incorporate water-efficient fixtures as required by Title 24 of the California Code of Regulations and the City's Green Building Ordinance. Because the proposed water demand could be accommodated by existing and planned water supply anticipated under the SFPUC's 2010 UWMP, the proposed project would not result in a substantial increase in water use and would be served from existing water supply entitlements and resources. In addition, the proposed project would include water conservation devices. In addition, as part of the building permit review process, a hydraulic analysis would be required from the SFPUC to determine if the water distribution facilities leading to the project site would require upgrading. The proposed project would be subject to and required to comply with upgrades, as determined by SFPUC through the building permit

review process, into the final project's design. Therefore, the proposed project would result in a less-than-significant impact.

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

The majority of San Francisco's solid waste that is not recycled is disposed of in the Altamont Landfill. The majority of San Francisco's solid waste that is not recycled is disposed of in the Altamont Landfill. As of March 2013, San Francisco's remaining capacity at the landfill was 1,052,815 tons out of the original 15 million ton capacity.⁷⁸ At current disposal rates, San Francisco's available landfill space under the existing contract will run out in January 2015. However, as of the year 2005 (latest year of record), the landfill has a closure date in 2025 and a remaining capacity of 74 percent.⁷⁹ San Francisco Ordinance No. 27-06 requires a minimum of 65 percent of all construction and demolition debris to be recycled and diverted from landfills. San Francisco had a goal of 75 percent solid waste diversion by 2010 and has a goal of 100 percent solid waste diversion by 2020. San Francisco diverted 80 percent of their solid waste in the year 2010.⁸⁰

With implementation of the proposed project, new trash receptacles would be in place at the project site and new residents would participate in the City's recycling and composting programs and other efforts to reduce the solid waste disposal stream. Due to the existing and anticipated increase of solid waste recycling in the City and the Altamont Landfill's remaining capacity, any increase in solid waste from the project site would have less-than-significant impacts at solid waste facilities.

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

The California Integrated Waste Management Act of 1989 (Assembly Bill 939) requires municipalities to adopt an Integrated Waste management Plan (IWMP) to establish objectives, policies, and programs relative to waste disposal, management, source reduction, and recycling. San Francisco Ordinance No. 27-06 requires a minimum of 65 percent of all construction and demolition debris to be recycled and diverted from landfills. San Francisco Ordinance No. 100-09 requires everyone in San Francisco to separate their solid waste into recyclables, compostables, and trash. The proposed project would be subject to and would comply with San Francisco Ordinance No. 27-06, San Francisco Ordinance No. 100-09 and all other applicable statutes and regulations related to solid waste. Therefore, the proposed project's impact to solid waste would be less than significant.

⁷⁸ DOE, "Zero Waste FAQ." Available online at: <http://www.sfenvironment.org/zero-waste/overview/zero-waste-faq>. Accessed August 1, 2013.

⁷⁹ CalRecycle, "Active Landfills Profile for Altamont Landfill and Resource Recovery (01-AA-0009)." Available online at: <http://www.calrecycle.ca.gov/SWFacilities/Directory/01-AA-0009/Detail/>. Accessed August 1, 2013.

⁸⁰ DOE, "Mayor Lee Announces San Francisco Reaches 80 Percent Landfill Waste Diversion, Leads All Cities in North America." Available online at: <http://www.sfenvironment.org/zero-waste/overview/goals>. Accessed August 1, 2013.

Impact C-UT-1: The proposed project in combination with past, present, and reasonably foreseeable future projects in the vicinity, would result in less-than-significant cumulative impacts to utilities and service systems. (Less than Significant)

The proposed project would not substantially impact utility provision or service. No other development in the project vicinity would contribute substantially to utilities and service systems cumulative effects. In addition, existing service management plans address anticipated growth in the region. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable utilities and service systems impact.

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

For a discussion of impacts to parks, refer to topics 9a, b, and c above.

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

The project site currently receives emergency services from the San Francisco Fire Department, Battalion 3, which includes a fire station at 935 Folsom Street approximately 0.4 mile southeast of the project site, and the San Francisco Police Department, Tenderloin Station at 301 Eddy Street, which is 0.2 mile northwest of the project site. The proposed project would include removal of the existing surface parking lot and construction of a new 12-story, 120-foot-tall, 112,600 gsf building. Implementation of the proposed project could incrementally increase demand for police and fire protection from the project site due to the introduction of approximately 264 residents and seven employees. This increase would not be substantial in light of the existing demand for police and fire protection in the City and relative to the number of area-wide residents and employees in the project vicinity, as described in Section E.2 Population and Housing. Because the proposed project is located in proximity to existing police and fire protection services and the proposed project would not substantially increase population in the area, the impacts would be less than significant.

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

The San Francisco Unified School District provides public school services in San Francisco. Some of the new residents of the proposed 109 dwelling units may be families with school-age children. It is anticipated that existing schools in the area could accommodate these students. Additionally, the proposed project would be assessed a per gross square foot school impact fee for the increase in residential space. Because the proposed project would not result in a substantial unmet demand for school facilities and would not necessitate new or physically altered school facilities, the impacts would be less than significant.

Impact PS-3: The proposed project would increase demand for other government services, but not to the extent that would require new or physically altered other government services. (Less than Significant)

Similar to Impacts PS-1 and 2 above, the proposed project would likely utilize other government services, such as libraries, but not to the extent that new or physically altered government services would be required. Therefore, the proposed project would have a less-than-significant impact to other government services.

Impact C-PS-1: The proposed project in combination with past, present, and reasonably foreseeable future projects in the vicinity, would result in less-than-significant cumulative impacts to public services. (Less than Significant)

The proposed project would not be expected to increase demand for public services beyond levels anticipated and planned for by public service providers. Additionally future developments would be subject to *Planning Code* impact fee requirements. No other proposed development in the project vicinity would contribute substantially to public services cumulative effects. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable public services impact.

<u>Topics:</u>		<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
12. BIOLOGICAL	RESOURCES—					
	Would the project:					
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒	☐

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

The project site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, topic 12f is not applicable.

Impact BI-1: The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any special-status species. (No Impact)

The project site consists of an existing off-street vehicle parking lot. No trees exist on or around the perimeter of the project site. A limited number of moveable planters exist on the project site. No special-status species are known to occur at the project site.

The proposed project would include removal of the existing surface parking lot and construction of a new 12-story, 120-foot-tall, 112,600 gsf building. The proposed project would not remove any trees or any other features that may contain habitat for any special-status species. Therefore, the proposed project would have no impact on special-status species.

Impact BI-2: The proposed project would not impact any sensitive natural communities or adversely affect any federally-protected wetlands. (No Impact)

The project site does not contain riparian habitat or other sensitive natural communities or a federally-protected wetland. No impact would occur.

Impact BI-3: The proposed project would not interfere with the movement of native resident or wildlife species or with established native resident or migratory wildlife corridors. (No Impact)

Structures in an urban setting may present risks for birds' migratory paths from their location and/or their features. The City has adopted guidelines to describe the issue and provide regulations for bird-safe design within the City.⁸¹ The regulations establish bird-safe standards for new building construction, additions to existing buildings, and replacement facades to reduce bird mortality from circumstances that are known to pose a high risk to birds and are considered to be "bird hazards." The two circumstances regulated are: 1) location-related hazards, where the siting of a structure creates increased risk to birds (defined as inside or within 300 feet of open spaces two acres and larger dominated by vegetation or open water) and 2) feature-related hazards, which may create increased risk to birds regardless of where the structure is located. For new building construction located in a location-related standard, the standards include façade requirements consisting of no more than 10 percent untreated glazing and the use of minimal lighting. Lighting that is used shall be shielded without any uplighting. Feature-related hazards include free-standing glass walls, wind barriers, skywalks, balconies, and greenhouses on rooftops that have unbroken glazed segments 24 square feet and larger in size. Any structure that contains these elements shall treat 100 percent of the glazing.

The project site consists of an existing off-street vehicular parking lot and is not within 300 feet of open spaces two acres or larger. Therefore, the project site is not within a location-related hazard. The proposed project would include removal of the existing surface parking lot and construction of a new 12-story, 120-foot-tall (131-to-140-foot tall with above-roof structures), 112,600 gsf building. Because the proposed project would be subject to and would comply with City adopted regulations for bird-safe buildings, the proposed project would not interfere with the movement of native resident or wildlife species or with established native resident or migratory wildlife corridors. No impact would occur.

Impact BI-4: The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. (No Impact)

The San Francisco Board of Supervisors adopted legislation that amended the City's Urban Forestry Ordinance, Public Works Code Section 801 et. Seq., to require a permit from the Department of Public Works (DPW) to remove any protected trees.⁸² If any activity is to occur within the dripline, prior to building permit issuance, a tree protection plan prepared by an International Society of Arborists-certified arborist is to be submitted to the Planning Department for review and approval. All permit applications that could potentially impact a protected tree must include a Planning Department "Tree Disclosure Statement." Protected trees include landmark trees, significant trees, or streets trees located on private or public property anywhere

⁸¹ San Francisco Planning Department, "Standards for Bird-Safe Buildings." Website provides the adopted *Standards for Bird-Safe Buildings* adopted by the Planning Commission, July 14, 2011 and Ordinance No. 199-11, adopted by the Board of Supervisors, October 7, 2011. Available online at: <http://www.sf-planning.org/index.aspx?page=2506>. Accessed August 5, 2013.

⁸² San Francisco Planning Department, "Required Checklist for Tree Planting and Protection." Available online at: <http://www.sf-planning.org/modules/showdocument.aspx?documentid=8321>. Accessed August 5, 2013

within the territorial limits of the City and County of San Francisco. Article 16 of the San Francisco Public Works Code, the Urban Forestry Ordinance, provides for the protection of landmark, significant, and street trees. Landmark trees are designated by the Board of Supervisors upon the recommendation of the Urban Forestry Council, which determines whether a nominated tree meets the qualification for landmark designations by using establish criteria (Section 810). Significant trees are those trees within the jurisdiction of the DPW or trees on private property within 10 feet of the public right-of-way that meet any of three size criteria. The size criteria for significant trees are a tree must have a diameter at breast height in excess of 12 inches, or a height in excess of 20 feet, or a canopy in excess of 15 feet (Section 810(A)(a)). Street trees are any tree growing within the public right-of-way, including unimproved public streets and sidewalks, and any tree growing on land under the jurisdiction of the DPW (Section 802(w)). If a project would result in tree removal subject to the Urban Forestry Ordinance and the DPW would grant a permit, the DPW shall require that replacement trees be planted (at a one-to-one ratio) by the project sponsor or that an in-lieu fee be paid by the project sponsor (Section 806(b)).

No trees would be removed as part of the proposed project and seven new street trees would be planted along the street frontages of the project site. Therefore, the proposed project would not conflict with any local policy ordinance protecting biological resources and no impact would occur.

Impact C-BI-1: The proposed project would result in no impact to biological resources; therefore, a discussion of cumulative impacts is not necessary. (No Impact)

As stated above, the proposed project would have no impact to biological resources; therefore, the proposed project would not contribute to any cumulative impacts related to biological resources. No impact would occur.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
13. GEOLOGY AND SOILS— Would the project:					
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	☐	☐	☒	☐	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐	☐
iv) Landslides?	☐	☐	☒	☐	☐

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐	☐
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?	☐	☐	☒	☐	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☐	☒
f) Change substantially the topography or any unique geologic or physical features of the site?	☐	☐	☐	☒	☐

The project proposed project would not use septic tanks or alternative wastewater disposal systems. Therefore, topic 13e is not applicable.

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

A geotechnical investigation was prepared for the proposed project.⁸³ The following discussion relies on the information provided in the geotechnical investigation.

Two geotechnical borings to depths ranging from 11.5 feet to 40 feet bgs and one cone penetration test to a depth of 48.5 feet bgs were completed at the project site. The results of the borings, cone penetration test, and investigation indicate that assessors Block 340, Lot 002, which fronts Mason Street, is covered by a 7.5-to-9.5-inch thick reinforced concrete slab underlain by approximately 14 feet of void space with a concrete slab at the bottom of void space. Assessors Block 340, Lots 005 and 006, which front Turk Street, is covered by concrete pavement underlain by approximately 10-12 feet of artificial fill with a concrete slab at the bottom of the fill. Between the void space for Lot 002 (14 feet bgs) and the fill for lots 005 and 006 (10-12 feet bgs) and approximately 22 bgs, native dune sand is present. Below this depth, the Colma formation is present. Groundwater was encountered at a depths ranging between 28.5 feet and 33 feet bgs, which is similar to depths encountered elsewhere in the project vicinity.

The project site does not lie within an Alquist-Priolo Earthquake Fault Zone as defined by the California Division of Mines and Geology. No known active faults cross the project site. The

⁸³ Rockridge Geotechnical, 2012.

closest mapped active fault in the vicinity of the project site is the San Andreas Fault, located approximately 7.5 miles west of the project site. This proximity would likely result in strong to very strong seismic ground shaking at the project site.

The project site lies within a liquefaction potential zone as mapped by the California Division of Mines and Geology for the City and County of San Francisco (seismic hazard zone).⁸⁴ The geotechnical borings and cone penetration test indicate that the soil beneath the groundwater underlying site is not susceptible to liquefaction because of its relatively high density and therefore, the potential for liquefaction is low.

Cyclic densification of non-saturated sand (sand above groundwater table) can occur during an earthquake, resulting in settlement of the ground surface and overlying improvements. The proposed new building would have one level of basement that would require the removal of a majority of the loose sand above the groundwater table. Therefore, the effects of cyclic densification of the loose sand should only occur with the surrounding improvements, on the order of one inch.

Most hillside sites throughout the San Francisco Bay Area are at some risk of ground displacements (i.e., landslides) during an earthquake. The project site is not located on a hillside and the project site has not been mapped by California Division of Mines and Geology for the City and County of San Francisco as being within an area of potential earthquake-induced landsliding.⁸⁵ Therefore, the potential for landslides to occur at the project site is low.

The geotechnical investigation provided recommendations for the proposed project's construction. These recommendations include, but are not limited to: installing a reinforced mat foundation to a depth below 13 feet bgs, including corrosion-resistant building materials, and providing temporary shoring during excavation, which would require installing temporary cantilevered soldier piles.

The geotechnical investigation concluded that with implementation of these recommendations, no significant impacts would occur from earthquake shaking or other seismic and geologic hazard impacts. The proposed project would be subject to and required to comply with these or other recommendations, as determined by DBI through its building permit review process, into the final project's design. Therefore, the proposed project would not result in exposure of people and structures to potential substantial adverse effects from geology and impacts are considered less than significant.

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

The project site is located in a highly developed urban area and is occupied by a parking lot. Therefore, the proposed project would not result in loss of topsoil. Construction of the proposed project would require excavation to a depth of up to 24 feet bgs. Site preparation and excavation

⁸⁴ *San Francisco General Plan, Community Safety Element, June 2012, Map 4.*

⁸⁵ *Ibid.*

activities would disturb soils, creating the potential for wind- and water-borne soil erosion; however, these activities would not result in substantial erosion because the project area is relatively flat. Furthermore, as discussed in Section E.14, Hydrology and Water Quality, the construction contractor would be required to implement construction BMPs to prevent erosion and discharge of sediment into construction site stormwater runoff. Therefore, impacts related to soil erosion and loss of topsoil would be less than significant.

Impact GE-3: The proposed project could be located on expansive soil, but would not create substantial risks to life or property. (Less than Significant)

Expansive soils expand and contract in response to changes in soil moisture, most notably when near surface soils change from saturated to a low-moisture content condition, and back again. It is unknown if expansive soils are beneath the project site. However, the proposed project would be subject to and required to comply with requirements from DBI, through its building permit review process, that would include an analysis of the potential for soil expansion impacts. Therefore, the proposed project would not create substantial risk to life or property from expansive soils and impacts would be less than significant.

Impact GE-4: The proposed project would not change substantially the topography or unique geologic or physical features of the site. (No Impact)

No unique geologic or physical features exist at the project site. No impact would occur.

Impact C-GE-1: The proposed project, in combination with the past, present, and reasonably foreseeable future projects in the site vicinity, would result in a less-than-significant cumulative impacts to geology and soils. (Less than Significant)

Geological impacts are generally site-specific and the proposed project would not have the potential to have cumulative effects with other projects. Cumulative development would be subject to the same design review and safety measures as the proposed project. These measures would render the geologic effects of cumulative projects to less-than-significant levels. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in cumulatively considerable geology and soils impacts.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
14. HYDROLOGY AND WATER QUALITY— Would the project:					
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion of siltation on- or off-site?	☐	☐	☒	☐	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☒	☐	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐	☐
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map?	☐	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☐	☒
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☐	☒

The project site is not located within a 100-year Flood Hazard Boundary,⁸⁶ a dam failure area,⁸⁷ or a tsunami hazard area.⁸⁸ A seiche is an oscillation of a water body, such as a bay, which may cause local flooding. A seiche could occur in the San Francisco Bay due to seismic or atmospheric activity. The project site is 1.2 miles from San Francisco Bay and would therefore not be subject to a seiche. No mudslide hazards exist at the project site because the project site is not located near any landslide prone areas.⁸⁹ Therefore, topics 14g, h, i, and j are not applicable.

Impact HY-1: The proposed project would not violate water quality standards or waste discharge requirements, substantially degrade water quality, or provide substantial additional sources of polluted runoff. (Less than Significant)

Proposed project-related wastewater would flow to the City's combined stormwater and sewer system and would be treated to standards contained in the City's NPDES Permit for the Southeast Water Pollution Control Plant prior to discharge into San Francisco Bay. Because the NPDES standards are set and regulated by the San Francisco Bay Area RWQCB, the proposed project would not conflict with RWQCB requirements.

During the proposed project's construction, the potential for erosion and transportation of soil particles would exist. Once in surface water runoff, sediment and other pollutants could leave the construction site and drain into the combined sewer and stormwater system, necessitating treatment at the Southeast Water Pollution Control Plant prior to discharge into the Bay. To minimize sediments and other pollutants from entering the combined sewer and stormwater system, an Erosion and Sediment Control Plan, including BMPs, would be required to be prepared by the project sponsor for the project to minimize stormwater runoff. In addition, as discussed in Section E.15 below, the proposed project would be subject to and required to comply with the Maher Ordinance, which has further site management and reporting requirements for potential hazardous soils.

The existing project site is completely covered with a paved parking lot. The proposed building footprint would also completely cover the project site; thus, project implementation would not result in an increase in impervious surface. The City's Stormwater Management Ordinance (Ordinance No. 83-10) would require the proposed project to maintain, reduce, or eliminate the existing volume and rate of stormwater runoff discharged from the project site. To achieve this, the proposed project would implement and install appropriate stormwater management systems that retain runoff onsite, promote stormwater reuse, and limit (or eliminate altogether) site discharges entering the combined sewer collection system. This in turn would limit the incremental demand on both the collection system and wastewater facilities resulting from stormwater discharges, and minimize the potential for upsizing or constructing new facilities. Therefore, due to the requirements of existing regulations, the proposed project would not violate

⁸⁶ Federal Emergency Management Agency, "Draft Special Flood Hazard Areas (San Francisco)," September 21, 2007.

⁸⁷ *San Francisco General Plan*, Community Safety Element, June 2012, Map 6.

⁸⁸ *Ibid*, Map 5.

⁸⁹ *Ibid*, Map 4.

water quality standards, substantially degrade water quality, or provide substantial additional sources of polluted runoff and impacts would be less-than-significant.

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

The project site is currently entirely covered with impervious surfaces, greatly limiting the amount of surface that water could infiltrate to the groundwater. The proposed project would not result in the use of groundwater and groundwater is not anticipated to be encountered during construction because excavation would occur to depths of approximately 24 feet bgs, while groundwater is anticipated and previously observed at depths ranging between 28.5 feet and 33 feet bgs. The proposed project would not increase the amount of impervious surface at the project site. Therefore, the proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge and impacts would be less-than-significant.

Impact HY-3: The proposed project would not result in altered drainage patterns that would cause substantial erosion or flooding or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. (Less than Significant)

No streams or rivers exist at the project site. Therefore, the proposed project would not alter the course of a stream or river or substantially alter the existing drainage pattern of the project site or area.

During the proposed project's construction, a potential for erosion and transportation of soil particles would exist, but as stated above in Impact HY-1, the proposed project would be subject to and be required to comply with regulations that limit the amount of runoff from the project site. The existing project site is completely covered with paved surfaces. The proposed building footprint would also completely cover the project site; thus, project implementation would not result in an increase in impervious surface. Therefore, due to the requirements of the existing regulations and because the proposed project would not increase impervious surfaces at the project site, the proposed project would not result in altered drainage patterns that would cause substantial erosion or flooding or contribute runoff which would exceed the capacity of existing or planned stormwater drainage systems and impacts would be less-than-significant.

Impact C-HY-1: The proposed project, in combination with the past, present, and reasonably foreseeable future projects in the site vicinity, would result in a less-than-significant cumulative impacts to hydrology and water quality. (Less than Significant)

Cumulative development in the project area could result in intensified uses and a cumulative increase in wastewater generation. The SFPUC has accounted for such growth in its service projections. The cumulative development projects would be required to comply with construction-phase stormwater pollution control and dewatering water quality regulations, if necessary, similar to the proposed project. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable hydrology and water quality impact.

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

The project site is not located within an airport land use plan area, or in the vicinity of a private airstrip. Therefore, topics 15e and f are not applicable.

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

The proposed project would result in the use of relatively small quantities of hazardous materials for routine purposes such as cleaners, disinfectants, and fertilizers. These products are labeled to inform users of potential risks and to instruct them in appropriate handling procedures. Most of these materials are consumed through use, resulting in relatively little waste. For these reasons, hazardous materials used would not pose any substantial public health or safety hazards related

to hazardous materials. Thus, the proposed project would result in less-than-significant impacts related through routine transport, use, or disposal of hazardous materials.

Impact HZ-2: The proposed project would not create a potentially significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, including within one-quarter mile of a school. (Less than Significant)

Setting

Two schools are within one-quarter mile of the project site: San Francisco City Academy (0.1 mile west) and De Marillac Academy (0.2 mile southwest).

AEI Consultant conducted a Phase I Environmental Site Assessment (ESA) at the project site.⁹⁰ The ESA was performed to provide a record of conditions at the subject property and to evaluate what, if any, environmental issues exist at the site. The ESA assessed the potential for adverse environmental impacts from the current and historical practices on the site and the surrounding area. The Phase 1 ESA no recognized environmental conditions for the project site.⁹¹

Hazardous Soil

The proposed project would include excavation to a depth of approximately 24 feet bgs and would require the removal and disposal of 7,000 to 8,000 cubic yards of soil. The project site has been developed with mainly commercial structures since at least 1877. The project site contained multiple low-rise building until the 1950s, including a hat cleaner and blocker as indicated in a 1930 City directory. This business could have used cleaning solvents (non halogenated solvents based on the date of the listing) and mercury. The project site has been used as a surface parking lot since the 1960s.

Although the Phase 1 ESA recognized no environmental conditions for the project site, in January 2013, a letter from the San Francisco Department of Public Health (DPH) was sent to the project sponsor stating the project site is located on fill which presents a potential source of contamination. DPH requested the current owners apply to the Voluntary Remedial Action Program (VRAP), including a soil sampling work plan and a site mitigation plan for subsurface investigation to be prepared and submitted to the DPH to determine current project site conditions.⁹² The site mitigation plan would also address other items such as a worker health

⁹⁰ AEI Consultants, *Phase I Environmental Site Assessment, Hotel Metropolis, 25 Mason Street, San Francisco, CA 94102*, February 18, 2010. This document is on file and available for public review at the San Francisco Planning Department, as part of Case File 2012.0678E.

⁹¹ The Phase 1 ESA did find historical recognized environmental conditions for the adjacent Hotel Metropolis, which is discussed under Impact HZ-3.

⁹² San Francisco Department of Public Health, Environmental Health, "Phase I Review and Request for Work Plan, Metropolis Hotel Parking Lots, 19-25 Mason, 2-16 Turk streets, San Francisco, SMED 916," January 31, 2013. This document is on file and available for public review at the San Francisco Planning Department, as part of Case File 2012.0678E.

and safety plan, dust control plan, and stormwater controls. The project sponsor enrolled in the VRAP and received an approved soil sampling work plan from the DPH in June 2013.⁹³

Subsequent to the June 2013 DPH letter, the San Francisco Board of Supervisors approved and the Mayor signed a series of amendments to the San Francisco Building and Health Codes, referred to as the Soil and/or Groundwater Testing Requirements Ordinance (Ordinance No. 155-13, July 16, 2013), which is an update to the existing Maher Ordinance. The intent of the updated Maher Ordinance is to identify, investigate, analyze, and when deemed necessary, remediate hazardous substances in soils by expanding the boundaries and types of projects for which soil testing is required and to require testing of groundwater under specified circumstances in order to protect the environment and public health and safety. The project site is within the boundaries of the updated Maher Ordinance and the elements requested by the DPH in the VRAP would now be required for the proposed project with implementation of the updated Maher Ordinance.

The proposed project would be required to remediate potential soil contamination described above in accordance with updated Maher Ordinance. Thus, the proposed project would not result in a significant hazard to the public or environment from contaminated soil and the proposed project would result in a less than significant impact.

Other Hazardous Materials

The project site is an existing surface parking lot with no buildings. Therefore, no other hazardous materials (e.g., mold, lead-based paint) would be anticipated during construction.

Impact HZ-3: The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. (Less than Significant)

The aforementioned ESA identified that an underground heating oil tank was located beneath the sidewalk on Turk Street. A tank closure occurred in 2007 and was overseen by the San Francisco DPH. Approximately three tons of soil was removed from that site. Soil samples, collected at 9.5 and 10 feet bgs, did not show detectable concentrations of contaminants. The DPH granted no further action for the site.⁹⁴ Therefore, the case is no longer considered active⁹⁵ and impacts would be less than significant.

⁹³ San Francisco Department of Public Health, Environmental Health, "Work Plan Approval, Metropolis Hotel Parking Lots, 19-25 Mason, 2-16 Turk streets, San Francisco, SMED 916," June 18, 2013. This document is on file and available for public review at the San Francisco Planning Department, as part of Case File 2012.0678E.

⁹⁴ San Francisco City and County Department of Public Health, Environmental Health Section, Local Oversight Program, "Underground Storage Tank Case, Hotel Metropolis, 25 Mason Street, San Francisco, LOP Case Number: 11805," September 29, 2011. This document is on file and available for public review at the San Francisco Planning Department, as part of Case File 2012.0678E.

⁹⁵ California Environmental Protection Agency, "Cortese List: Section 65962.5(c)." Available online at: <http://www.calepa.ca.gov/sitecleanup/corteselist/SectionC.htm>. Accessed July 18, 2012.

Impact HZ-4: The proposed project would not expose people or structures to a significant risk of loss, injury or death involving fires, nor interfere with the implementation of an emergency response plan. (Less than Significant)

San Francisco ensures fire safety primarily through provisions of the *Building* and the *Fire Codes*. In addition, the San Francisco Fire Department, as well as DBI, reviews the final building plans to ensure conformance with these provisions. In addition, the proposed project is not located within a fire hazard severity zone.⁹⁶ The proposed project would conform to these standards, which (depending on building type) may also include development of an emergency procedure manual and an exit drill plan. Therefore, potential emergency response and fire hazard impacts of the proposed project would be less-than-significant.

Impact C-HZ-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would result in less-than-significant impacts related to hazards and hazardous materials. (Less than Significant)

Impacts from hazards are generally site-specific, and typically do not result in cumulative impacts. The proposed project would not have a significant impact on hazardous material conditions on the project site or vicinity. No other project developments in the project vicinity that would contribute considerably to cumulative effects. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable hazards and hazardous materials impact.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
16. MINERAL AND ENERGY RESOURCES— Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☐	☒
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	☐	☐	☒	☐	☐

Impact ME-1: The proposed project would not result in the loss of availability of a known mineral resource or a locally-important mineral resource recovery site. (Not Applicable)

All land in San Francisco, including the project site, is designated Mineral Resource Zone 4 (MRZ-4) by the California Division of Mines and Geology (CDMG) under the Surface Mining and

⁹⁶ California Department of Forestry and Fire Protection (CalFire), "Draft Fire Hazard Severity Areas in LRA, San Francisco (Map)," September 17, 2007.

Reclamation Act of 1975.⁹⁷ This designation indicates that there is inadequate information available for assignment to any other MRZ and thus the project site is not designated area of significant mineral deposits. No operational mineral resource recovery sites exist in the project area whose operations or accessibility would be affected by the proposed project. Therefore, significance criteria 16(a) and (b) are not applicable to the proposed project.

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

The proposed project would include removal of the existing surface parking lot and construction of a new 12-story, 120-foot-tall, 112,600 gsf building. Demolition and construction activities would require electricity to operate air compressors, hand tools, mobile project offices, and lighting. Construction vehicles and equipment would primarily use diesel fuel, and construction workers would use gasoline and diesel to commute. The construction activities would not result in demand for electricity or fuels greater than that for any other similar project in the region. Given this, the construction-related energy use associated with the proposed project would not be large or wasteful. Therefore, the construction-related impacts on fuel, water, or energy would be less than significant.

The operation of the proposed building would not result in the use of large amounts of fuel, water, or energy. The proposed project would use energy produced in regional power plants using hydropower and natural gas, coal, and nuclear fuels and would not use substantial quantities of other nonrenewable natural resources. The proposed project would meet, or exceed, current state and local energy conservation standards, including the City's Green Building Ordinance and Title 24 of the California Code of Regulations, enforced by DBI. While the proposed project would increase demand for energy, the project-generated demand would be typical for a project of this size and would be negligible in the context of the overall consumer demand in San Francisco and the state. Therefore, the operation of the proposed building would not result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner and impacts are considered less-than-significant.

Impact C-ME-1: The proposed project, in combination with the past, present, and reasonably foreseeable future projects in the site vicinity, would result in less-than-significant cumulative impacts to energy and minerals. (Less than Significant)

No known minerals exist at the project site and thus, the proposed project would not contribute to any cumulative impact on mineral resources. The project-generated demand for electricity would be negligible in the context of overall demand within San Francisco, the greater Bay Area, and the State, and would not in and of itself require any expansion of power facilities. The City plans to reduce GHG emissions to 25 percent below 1990 levels by the year 2017 and ultimately reduce GHG emission to 80 percent below 1990 levels by 2050 which would be achieved through a number of different strategies, including energy efficiency. Therefore, the energy demand associated with the proposed project would not substantially contribute to a cumulative impact on existing or proposed energy supplies or resources. For these reasons, the proposed project, in

⁹⁷ California Division of Mines and Geology, Open File Report 96-03 and Special Report 146 Parts 1 and II)

combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable mineral and energy resources impact.

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

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

The project site is an existing parking lot surrounded by an urbanized area of San Francisco. The California Department of Conservation's Farmland Mapping and Monitoring Program identify the site as "Urban and Built-up Land".⁹⁸ Because the project site does not contain agricultural uses and is not zoned for such uses, the proposed project would not convert any prime farmland, or Farmland of Statewide Importance to non-agricultural use, and it would not conflict with existing zoning for agricultural land use or a Williamson Act contract, nor would it involve any changes to the environment that could result in the conversion of farmland. Additionally, the proposed project would not convert any forest land or timberland to non-forest use. Forest land

⁹⁸ California Department of Conservation, "Bay Area Region Important Farmland 2004 and Urbanization 1984 – 2004 (Map)," March 2007.

is defined as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits” (Public Resources Code § 12220(g)). Timberland is defined as “land, other than land owned by the federal government and land designated by the board (State Board of Forestry and Fire Protection) as experimental forest land, which is available for, and capable of, growing a crop of trees of any commercial species uses to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis after consultation with the district committees and others” (Government Code § 51104(g)). Therefore, significance criteria 18(a), (b), (c), (d), and (e) are not applicable to the proposed project.

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

As described in Section E.4, Cultural Resources, the proposed project could result in a substantial adverse change in the significance of contributors to a historic district and an archeological resource. In addition, the proposed project could disturb human remains or result in damage to, or destruction of, as yet- unknown unique paleontological resource. Implementation of Mitigation Measures M-CP-1a, M-CP-1b, M-CP-3, and M-CP-4 would reduce the impacts to less-than-significant levels. Therefore, the proposed project would not result in a significant impact through the elimination of important examples of major periods of California history or prehistory.

Both long-term and short-term environmental effects, including substantial adverse effects on human beings, associated with the proposed project would be less than significant, as discussed

under each environmental topic. Each environmental topic area includes an analysis of cumulative impacts based on land use projects, compliance with adopted plans, statutes, and ordinances, and currently proposed projects.

F. MITIGATION MEASURES AND IMPROVEMENT MEASURES

The following mitigation measures have been identified to reduce potentially significant environmental impacts resulting from the proposed project to less-than-significant levels. In addition, improvement measures have also been agreed to by the project sponsor to further reduce less-than-significant impacts.⁹⁹

Mitigation Measure M-CP-1a: Construction Best Practices for Historical Architectural Resources

The project sponsor shall incorporate into construction specifications for the project a requirement that the construction contractor(s) use all feasible means to avoid damage to adjacent and nearby historic buildings (contributors to historic districts and/or individually significant), including, but not necessarily limited to:

- Using techniques in removal of the parking lot, excavation, shoring, and construction that create the minimum feasible vibration;
- Appropriately shoring excavation sidewalls to prevent movement of potentially affected buildings, as necessary;
- Underpinning of foundations of potentially affected buildings, as necessary;
- Restricting the use of heavy equipment within 10 horizontal feet from potentially affected shallow foundation and basement walls; and
- The installation of solidier piles shall implement pile driving technology with less groundborne vibration than impact drivers (e.g., such as pre-drilling of piles and sonic pile drivers), where feasible.
- The installation of solidier piles and other vibratory methods shall be restricted within 25 feet of existing potentially affected buildings or at distances set to meet the maximum vibration level(s) established by the requirements in Mitigation Measure M-CP-1b, whichever is more restrictive.

Mitigation Measure M-CP-1b: Construction Monitoring Program for Historical Architectural Resources

The project sponsor shall undertake a monitoring program to minimize damage to nearby historic resource buildings (contributors to historic districts and/or individually significant) and to ensure that any such damage is documented and repaired. The monitoring program shall include the following components: Prior to the start of any

⁹⁹ *Agreement to Implement Mitigation and Improvement Measures*, Mason and Turk Street Residential Mixed-Use Project, Case No. 2012.0678E, July 8, 2014. This document is on file and available for public review at the San Francisco Planning Department, as part of Case File 2012.0678E.

ground-disturbing activity, the project sponsor shall engage a historic architect or qualified historic preservation professional to undertake a preconstruction survey of historical resource(s) identified by the Planning Department within 100 feet of planned construction to document and photograph the buildings' existing conditions (e.g., crack survey). Based on the construction and conditions of the resource(s), the professional, in consultation with the Department of Building Inspection or qualified geotechnical engineer, if necessary, shall establish a maximum vibration level(s) that shall not be exceeded at each building, based on the existing condition, character-defining features, soils conditions, and anticipated construction practices (a common standard is 0.2 or 0.3 inches per second, peak particle velocity). To ensure that vibration levels do not exceed the established standard(s), the project sponsor shall monitor vibration levels at each surveyed building and shall prohibit vibration construction activities that generate vibration levels in excess of the standard(s).

Should vibration levels be observed in excess of the standard(s), construction shall be halted and alternative techniques put into practice, to the extent feasible. The professional shall conduct regular periodic inspections of each surveyed building during ground-disturbing activity on the project site. Should damage to the surveyed building(s) occur from construction activities on the project site, the surveyed building(s) shall be remediated to its' preconstruction conditions immediately following the conclusion of ground-disturbing activity on the project site.

Mitigation Measure M-CP-3: Archeological Resource Monitoring

Based on the reasonable potential that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of an archaeological consultant from the rotational Department Qualified Archaeological Consultants List (QACL) maintained by the Planning Department archaeologist. The project sponsor shall contact the Department archaeologist to obtain the names and contact information for the next three archeological consultants on the QACL. The archeological consultant shall undertake an archeological monitoring program. 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 Sect. 15064.5 (a)(c).

Archeological monitoring plan (AMP). The archeological monitoring plan 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 project archeologist 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 (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the potential risk these activities pose to archaeological 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 archaeological 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 the 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 crews and heavy 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, after making a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, present the findings of this assessment to the ERO.

Consultation with Descendant Communities: On discovery of an archeological site¹⁰⁰ associated with descendant Native Americans or the Overseas Chinese an appropriate representative¹⁰¹ 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 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

¹⁰⁰ By the term “archeological site” is intended here to minimally include any archeological deposit, feature, burial, or evidence of burial.

¹⁰¹ 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 and in the case of the Overseas Chinese, the Chinese Historical Society of America.

the Final Archaeological Resources Report shall be provided to the representative of the descendant group.

If the ERO in consultation with the archeological consultant 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:

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

If an archeological data recovery program is required by the ERO, the archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The project archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP. The archeological consultant shall prepare a draft ADRP that shall be submitted to the ERO for review and approval. 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 will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the 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.

Human Remains, Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal Laws, including immediate notification of the Coroner of the City and County of San Francisco and the ERO and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archeological consultant, project sponsor, ERO and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, curation, possession, and final disposition of the human remains and associated or unassociated funerary objects.

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 draft final report.

Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The 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 or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.

Mitigation Measure M-CP-4: Paleontological Resource Accidental Discovery

Based on the reasonable potential that paleontological resources may be present within the project site at excavation depths within the Colma formation, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on paleontological resources. Before the start of any earthmoving activities, the project sponsor shall retain a qualified paleontologist to train all construction personnel involved with earthmoving activities, including the site superintendent, regarding the possibility of encountering fossils, the appearance and types of fossils likely to be seen during construction, and proper notification procedures should fossils be encountered.

If paleontological resources are discovered during earthmoving activities, the construction crew shall immediately cease work near the find and notify the project

sponsor and the San Francisco Planning Department. The project sponsor shall retain a qualified paleontologist to evaluate the resource and prepare a recovery plan in accordance with Society of Vertebrate Paleontology guidelines.¹⁰² The recovery plan may include a field survey, construction monitoring, sampling and data recovery procedures, museum storage coordination for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the City to be necessary and feasible shall be implemented before construction activities can resume at the site where the paleontological resources were discovered.

Improvement Measures

Improvement Measure I-TR-1a: Implement Additional and Project-Specific Travel Demand Strategies to Reduce Vehicle Trips

The project sponsor, property owner, or official designee of the development, should implement a Transportation Demand Management (TDM) Program that seeks to minimize the number of single occupancy vehicle (SOV) trips generated by the proposed project for the lifetime of the project. The TDM Program targets a reduction in SOV trips by encouraging persons to select other modes of transportation, including, walking, bicycling, transit, car-share, carpooling, and/or other modes.

The project sponsor has agreed to implement the following TDM measures:

- **Identify TDM Coordinator:** The project sponsor should identify a TDM coordinator for the project site. The TDM Coordinator is responsible for the implementation and ongoing operation of all other TDM measures described below. The TDM Coordinator could be a brokered service through an existing transportation management association (e.g., the Transportation Management Association of San Francisco), or the TDM Coordination could be an existing staff member (e.g., property manager); the TDM Coordinator does not have to work full-time at the project site. However, the TDM Coordinator should be the single point of contact for all transportation-related questions from building occupants and City staff. The TDM Coordinator should provide TDM training to other building staff about the transportation amenities and options available at the project site and nearby.
- **Provide Transportation and Trip Planning Information to Building Occupants:**
 - *Move-in packet:* Provide a transportation insert for the move-in packet that includes information on transit service (local and regional, schedules and fares), information on where transit passes could be purchased, information on the 511 Regional Rideshare Program and nearby bike and car share programs, and information on where to find additional web-based alternative transportation materials (e.g., NextMuni phone app). This move-in packet should be continuously updated as local transportation options change, and the packet should be provided to each new building occupant. Provide Muni maps, San

¹⁰² Society of Vertebrate Paleontology, "Conditions of Receivership for Paleontologic Salvage Collections (final draft)," 1996, *Society of Vertebrate Paleontology News Bulletin* 166:31-32.

San Francisco Bicycle and Pedestrian maps upon request. A NextMuni digital screen on-site could be a way of detailing real-time Muni transit information.

- *Current transportation information:* Provide ongoing local and regional transportation information and updates (e.g., up-to-date transit maps and schedules, maps of bicycle routes, internet links) for new and existing occupants.
- *Ride Board:* Provide a “ride board” through which residents can offer/request rides, on the Homeowners Association website and/or lobby bulletin board.
- **Bicycles:**
 - *Signage:* Ensure that the points of access to bicycle parking through elevators on the ground floor (preferred location) and the garage ramp include signage indicating the location of these facilities.
 - *Tenant Cooperation:* Encourage commercial tenants to allow bicycles in the workplace by identifying a location within the commercial space or garage for bicycle storage.
 - *Safety:* Ensure that bicycle safety strategies are developed along the sides of the property, avoiding conflicts with private cars, transit vehicles and loading vehicles, such as those described in Improvement Measure I-TR-1b, Loading Monitoring and Queue Abatement.
 - *Workshop:* The TDM Coordinator should provide information about and/or host a bike safety workshop conducted by a third party.
 - *Parking:* In addition, the project sponsor should provide the following amounts of bicycle parking above the *Planning Code* requirements:
 - o Eight additional Class 1 bicycle spaces in the ground-floor bicycle room;
 - o Eight additional Class 2 bicycle spaces in the basement level, next to parking stall #8; and
 - o As needed to meet demand, up to 48 Class 1 bicycle spaces in the ground-floor 361-square-foot storage room.
- **Car Share Access:** Ensure that points of access to car share spaces to building and non-building occupants are made convenient (e.g., signage from public right-of-way and internal lobbies).

TDM Program Monitoring

The project sponsor should collect data and make monitoring reports available for review by the Planning Department.

- **Timing:** Monitoring reports should be required to be submitted to City staff biannually (every two years) for four reporting periods. The first monitoring report is required one year after 80 percent occupancy of the units for the new building. Each trip count and survey (see below for definitions) should be completed with 90 days following the end of the applicable biannual reporting period. Each monitoring report should be completed within 180 days following the applicable biannual reporting period.
- **Components:** The monitoring report, including trip counts and surveys, should include the following components OR comparable alternative methodology and components as approved or provided by City staff:

- *Trip Count and Intercept Survey:* Trip count and intercept survey of persons arriving and leaving the building for no less than two days of the reporting period between 6 AM and 8 PM. One day should be a Tuesday, Wednesday, or Thursday, and another day should be a Saturday.^{103, 104}
- *Travel Diary or Stated Preference Survey:* The project sponsor should request in writing from City staff a one-week travel diary or stated preference survey (online or paper).¹⁰⁵ The one-week travel diary or stated preference survey should be distributed to residents and employees of the building to supplement the trip count and intercept survey data and be deemed complete with at least a 20 percent response rate. To encourage participation, the property manager/coordinator should provide an incentive (e.g., gift card, reduced rent or homeowner association fee, etc.).
- *Property Manager/Coordinator Survey:* The project sponsor should request in writing from City staff a survey (online or paper) that should be completed by property manager/coordinator to document which TDM Program were implemented during the reporting period and obtain basic building information (e.g., percent unit occupancy, off-site parking utilization by occupants of the building, loading frequency, etc.).
- *Travel Demand Information:* The above trip count and survey information should be able to provide travel demand analysis characteristics as outlined in the SF Guidelines.¹⁰⁶
- *Assistance and Confidentiality:* City staff will assist the TDM Coordinator on questions regarding the components of the monitoring report and shall ensure that the identity of individual survey responders is protected.

Improvement Measure I-TR-1b: Loading Monitoring and Queue Abatement

The project sponsor, property owner, or official designee of the development, should monitor and ensure recurring vehicle queues do not occur on Turk Street for the proposed off-street parking facility. A vehicle queue is defined as one or more vehicles (destined to the parking facility) blocking any portion of any public street, alley or sidewalk for a consecutive period of three minutes or longer on a daily or weekly basis.

If recurring queuing occurs, the owner/operator of the parking facility should employ abatement methods as needed to abate the queue. Suggested abatement methods include but are not limited to the following: redesign of facility to improve vehicle circulation

¹⁰³ The trip count and intercept survey shall be prepared by a qualified transportation or qualified survey consultant and the methodology shall be approved by the Planning Department prior to conducting the components of the trip count and intercept survey.

¹⁰⁴ An example of an appropriate trip count and intercept survey can be found in the University of California, Davis, *California Smart-Growth Trip Generation Rates Study*, March 2013, available online at: <http://ultrans.its.ucdavis.edu/projects/smart-growth-trip-generation>.

¹⁰⁵ An example of an appropriate travel diary and stated preference survey distributed are those found in the California Department of Transportation, *2010-2012 California Household Travel Survey Final Report*, June 14, 2013.

¹⁰⁶ City and County of San Francisco, *Transportation Impact Analysis Guidelines for Environmental Review*, October 2002, or subsequent updates, if applicable.

and/or on-site queue capacity; employment of parking attendants; installation of LOT FULL signs with active management by parking attendants; use of valet parking or other space-efficient parking techniques; use of off-site parking facilities or shared parking with nearby uses; use of parking occupancy sensors and signage directing drivers to available spaces; travel demand management strategies such as those listed in Improvement Measure I-TR-1a, including additional bicycle parking, delivery services; and/or parking demand management strategies such as parking time limits, paid parking, time-of-day parking surcharge, or validated parking.

If the Planning Director, or his or her designee, suspects that a recurring queue is present, the Department should notify the property owner in writing. Upon request, the owner/operator should hire a qualified transportation consultant to evaluate the conditions at the site for no less than seven days. The consultant should prepare a monitoring report to be submitted to the Department for review. If the Department determines that a recurring queue does exist, the facility owner/operator should have 90 days from the date of the written determination to abate the queue.

Improvement Measure I-TR-1c: Coordination of Move-In and Move-Out and Activities related to Large Trucks

To ensure that residential move-in and move-out activities do not impede traffic flow on Mason Street or Turk Street, move-in and move-out operations, as well as larger deliveries that cannot be accommodated by the off-street service vehicle spaces should be scheduled and coordinated through building management.

Improvement Measure I-TR-1d: Non-Peak Construction Traffic Hours

To minimize the construction-related disruption of the general traffic flow on adjacent streets during the AM and PM peak periods, the contractor should restrict truck movements and deliveries to, from, and around the project site during peak hours (generally 7 to 9 AM and 4 to 6 PM,) or other times, as determined by San Francisco Municipal Transportation Agency and its Transportation Advisory Staff Committee.

Improvement Measure I-TR-1e: Construction Management

As an improvement measure to reduce potential conflicts between construction activities and pedestrians, transit and automobiles at the Project site, the contractor should add certain measures to the required traffic control plan for Project construction. In addition to the requirements for the construction traffic control plan, the Project should include the following measures:

- Identify construction traffic management best practices in San Francisco, as well as others that, although not being implemented in the City, could provide valuable information for the project. Management practices include, but are not limited to the following:
 - Identifying ways to reduce construction worker vehicle-trips through transportation demand management programs and methods to manage construction worker parking demands.

- Identifying best practices for accommodating pedestrians, such as temporary pedestrian wayfinding signage or temporary walkways.
- Identifying ways to consolidate truck delivery trips, including a plan to consolidate deliveries from a centralized construction material and equipment storage facility.
- Identifying a route(s) for construction-related trucks to utilize during construction.
- Require consultation with surrounding community, including business and property owners near the project site to assist coordination of construction traffic management strategies as they relate to the needs of other users adjacent to the project site.
- Develop a public information plan to provide adjacent residents and businesses with regularly-updated information regarding project construction activities, peak construction vehicle activities, (e.g. concrete pours), travel lane closures, and other lane closures. Provide a project contact for such construction-related concerns.

Improvement Measure I-TR-4a: Installation of Eyebolts

As an improvement measure to reduce pole clutter on Turk Street, within one year after issuance of a building permit for the subject project, the project sponsor should coordinate with the San Francisco Municipal Transportation Agency (SFMTA) to determine whether it would be appropriate to install eyebolts in the new building to support SFMTA's overhead wire system.

Improvement Measure I-TR-4b: Pedestrian Improvements

As the improvement measure to improve accessibility for pedestrians in the project vicinity, within one year after issuance of a building permit for the subject project, the project sponsor should contact the San Francisco Municipal Transportation Agency in writing to fund a curb ramp for pedestrians heading south across Turk Street from the west side of Mason Street.

Improvement Measure I-AQ-2: Construction Emissions Minimization

A. *Construction Emissions Minimization Plan.* Prior to issuance of a construction permit, the project sponsor should 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 should 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 should meet the following requirements:
 - a) Where access to alternative sources of power are available, portable diesel engines should be prohibited;
 - b) All off-road equipment should have:
 - i. Engines that meet or exceed either U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 2 off-road emission

- standards, and
- ii. Engines that are retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy (VDECS).¹⁰⁷
- 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 should 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 should provide the next cleanest piece of off-road equipment as provided by the step down schedules in Table A.

Table A – Off-Road Equipment Compliance Step-down Schedule

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

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.

* Alternative fuels are not a VDECS.

- 2. The project sponsor should 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 should be posted in multiple languages (English, Spanish, Chinese) in designated queuing areas and at the construction site to remind operators of

¹⁰⁷ Equipment with engines meeting Tier 4 Interim or Tier 4 Final emission standards automatically meet this requirement, therefore a VDECS would not be required.

- the two minute idling limit.
3. The project sponsor should require that construction operators properly maintain and tune equipment in accordance with manufacturer specifications.
 4. The Plan should 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 should indicate the type of alternative fuel being used.
 5. The Plan should be kept on-site and available for review by any persons requesting it and a legible sign should 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 should provide copies of Plan to members of the public as requested.
- B. *Reporting.* Quarterly reports should 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 should include the actual amount of alternative fuel used.

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

Improvement Measure I-AQ-4a: Best Available Control Technology for Diesel Generators

All diesel generators should have engines that (1) meet Tier 4 Final or Tier 4 Interim emission standards, or (2) meet Tier 2 emission standards and are equipped with a California Air Resources Board (ARB) Level 3 Verified Diesel Emissions Control Strategy (VDECS).

Improvement Measure I-WS-1: Wind Reduction on New Rooftop Deck

To reduce wind and improve usability on the new rooftop deck, the project sponsor should provide wind screens or landscaping along the north and west perimeter of the new rooftop deck. Suggestions include *Planning Code* compliant porous materials or structures (vegetation, hedges, screens, latticework, perforated or expanded metal) as opposed to a solid surface.

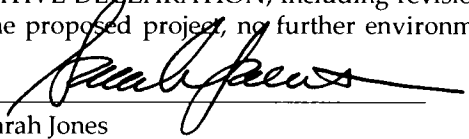
G. PUBLIC NOTICE AND COMMENT

A "Notification of Project Receiving Environmental Review" was mailed on February 4, 2013, to owners of properties within 300 feet of the project site, adjacent occupants, and neighborhood groups. Comments regarding physical environmental effects were related to: (1) loading and (2) traffic; and (3) light and air on adjacent buildings. In addition, a commenter had concerns about the (4) lack of parking proposed in the project. All of these comments have been addressed under the topics in Section E, Evaluation of Environmental Effects under the following topics: comment (1), (2), and (4) under topic 4, Transportation and Circulation, and comment (3) under topic 8, Wind and Shadow.

H. DETERMINATION

On the basis of this Initial Study:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.


Sarah Jones
Environmental Review Officer
for
John Rahaim
Director of Planning

DATE July 8, 2014

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