



# SAN FRANCISCO PLANNING DEPARTMENT

## Community Plan Exemption Checklist

*Case No.:* 2014.002016E  
*Project Address:* 15/23 Grace Street and 17 Grace Street  
*Zoning:* RED-MX (Residential Enclave, Mixed) Use District  
Western SoMa Special Use District  
45-X Height and Bulk District  
*Block/Lot:* 3509/024, 025 and 026  
*Lot Size:* 5,710 square feet  
*Plan Area:* Western SoMa  
*Project Sponsor:* Marc Dimalanta, (415) 252-0888  
*Staff Contact:* Justin Horner – (415) 575-9023  
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### PROJECT DESCRIPTION

The 5,710-square-foot project site is made up of three adjacent parcels. Parcel #1 located at 15 Grace Street is 1,420- square feet; parcel #2 located at 23 Grace Street is 1,420- square feet; and parcel #3 located at 17 Grace Street is 2,880 square feet. All three parcels are located on Grace Street on the block bordered by Grace Street to the west, Washburn Street to the east, Mission Street to the north and Howard Street to the south in the South of Market neighborhood (Figure 1). -Parcel #3 at 17 Grace Street is a through lot between Grace Street and Washburn Street. The entire project site is currently a paved surface parking lot. The project site is located in the RED-MX (Residential Enclave-Mixed) zoning district and a 45-X height and bulk district.

The proposed project would include the merger of parcels #1 and #2, the construction of an 8,041 square foot, four-story, 45-foot-tall residential building with 11 residential units, one of which will be below market rate, on the merged parcel (15/23 Grace Street), and the construction of an 8,385-square-foot four-story, 45-foot-tall residential building with 11 residential, one of which will be below market rate, units on parcel #3 (17 Grace Street). The 15/23 Grace Street building would include six one-bedroom units that average 430 sf each, and four two-bedroom units that average 704 sf in size. The residential lobby entrance for 15/23 Grace Street would be located on Grace Street. The 17 Grace Street building would include four studios that average 308 square feet in size, three one-bedrooms that average 456 square feet, and four two-bedrooms that average 694 square feet in size. The residential entrances for 17 Grace Street would be on Grace Street and Washburn Street. Each building would provide 11 class 1 bicycle parking spaces<sup>1</sup> on the first floor, two class 2 bicycle parking spaces<sup>2</sup> on Grace Street, and no on-site vehicle parking. The proposed 15/23 Grace Street building would remove a curb cut on Grace Street, and 17 Grace Street would remove existing curb cuts on Grace Street and Washburn Street (Figures 2-13). Construction of 15/23 Grace Street would require approximately 140 cubic yards of excavation to a

<sup>1</sup> Class one bicycle spaces are spaces in secure, weather-protected facilities intended for use as long-term, overnight, and work-day bicycle storage by dwelling unit residents, non-residential occupants, and employees. Planning Code section 155.1(a).

<sup>2</sup> Class two bicycle spaces are "bicycle racks located in a publicly-accessible, highly visible location intended for transient or short-term use by visitors, guests, and patrons to the building or use. Planning Code section 155.1 (a).

maximum depth of approximately 5 feet, and construction of 17 Grace Street would require approximately 143 cubic yards of excavation to a maximum depth of approximately 5 feet. Construction for both projects would last approximately 11 months.

## PROJECT APPROVAL

The proposed project at 15/23 and 17 Grace Street would require the following approvals:

- Approval of building permits from the San Francisco Department of Building Inspection for new construction.
- Approval of a site mitigation plan from the San Francisco Department of Public Health prior to the commencement of any excavation work.
- Approval of stormwater management plan by the San Francisco Public Utilities Commission.

The approval of the building permit would be the *approval action* for the project. The approval action date establishes the start of the 30-day appeal period for this CEQA determination pursuant to section 31.04(h) of the San Francisco Administrative Code

## EVALUATION OF ENVIRONMENTAL EFFECTS

This initial study evaluates whether the environmental impacts of the proposed project are addressed in the programmatic environmental impact report prepared for the Western SoMa Community Plan, Rezoning of Adjacent Parcels, and 350 Eighth Street Project (Western SoMa PEIR).<sup>3</sup> The initial study indicates whether the proposed project would result in significant impacts that: (1) are peculiar to the project or project site; (2) were not identified as significant project-level, cumulative, or off-site effects in the PEIR; or (3) are previously identified significant effects, which as a result of substantial new information that was not known at the time that the Western SoMa PEIR was certified, are determined to have a more severe adverse impact than discussed in the PEIR. Such impacts, if any, will be evaluated in a project-specific mitigated negative declaration or environmental impact report. If no such topics are identified, the proposed project is exempt from further environmental review in accordance with CEQA section 21083.3 and CEQA Guidelines section 15183.

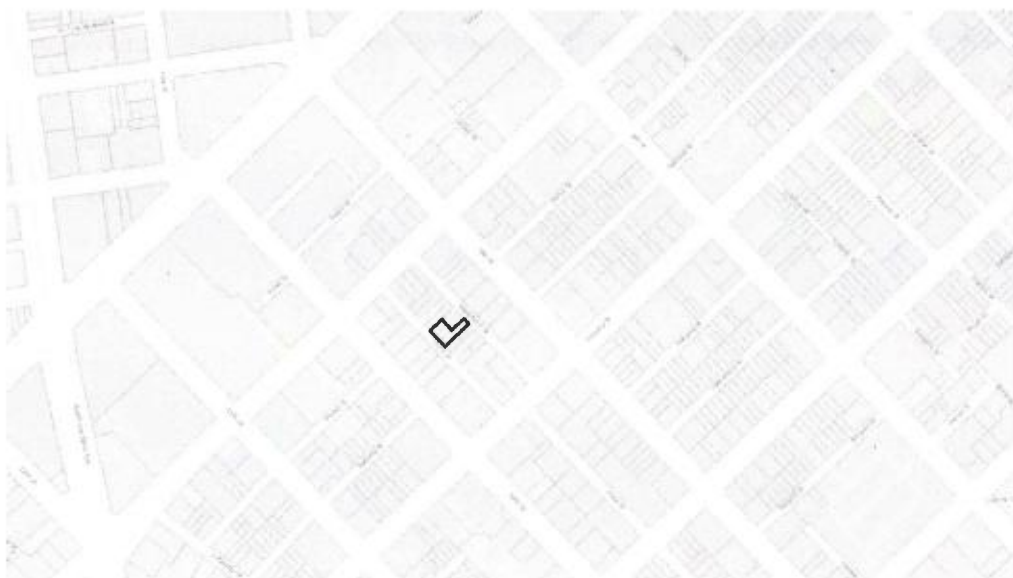
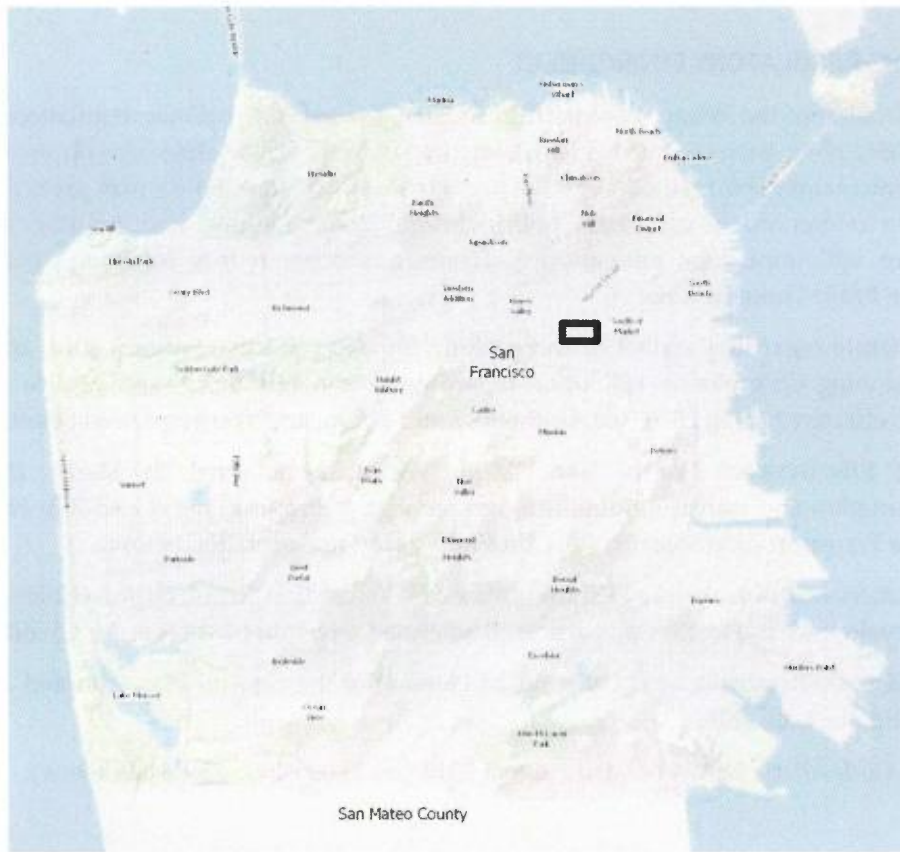
Mitigation measures identified in the PEIR are discussed under each topic area, and measures that are applicable to the proposed project are provided under the Mitigation Measures section at the end of this initial study.

The Western SoMa PEIR identified significant impacts related to transportation and circulation, cultural and paleontological resources, wind and shadow, noise and vibration, air quality, biological resources, and hazards and hazardous materials. Additionally, the PEIR identified significant cumulative impacts related to shadow, transportation and circulation, cultural and paleontological resources, air quality, and noise. Aside from shadow, mitigation measures were identified for the above impacts and reduced said impacts to less-than-significant except for those related to transportation (program-level and cumulative traffic impacts at three intersections; and cumulative transit impacts on several Muni lines), cultural and paleontological resources (cumulative impacts from demolition of historic resources), noise (cumulative

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<sup>3</sup> San Francisco Planning Department, Western SoMa Community Plan, Rezoning of Adjacent Parcels, and 350 Eighth Street Project Final Environmental Impact Report, Planning Department Case Nos. 2008.0877E and 2007.1035E, State Clearinghouse No. 2009082031, certified December 6, 2012. Available online at: <http://www.sf-planning.org/index.aspx?page=1893>, accessed May 28, 2015.

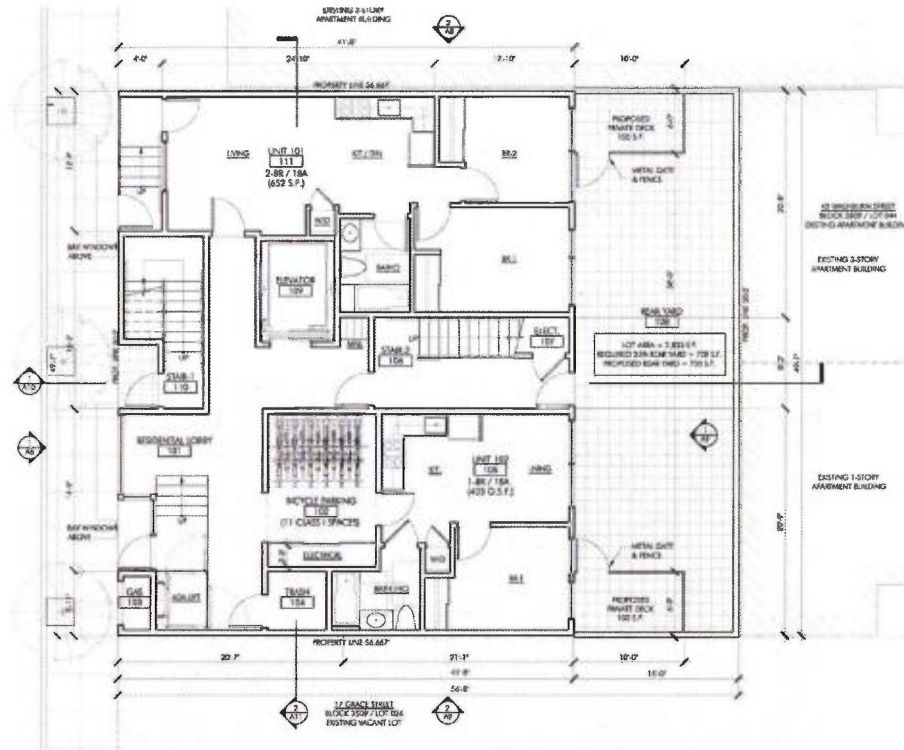
Figure 1. Project Location



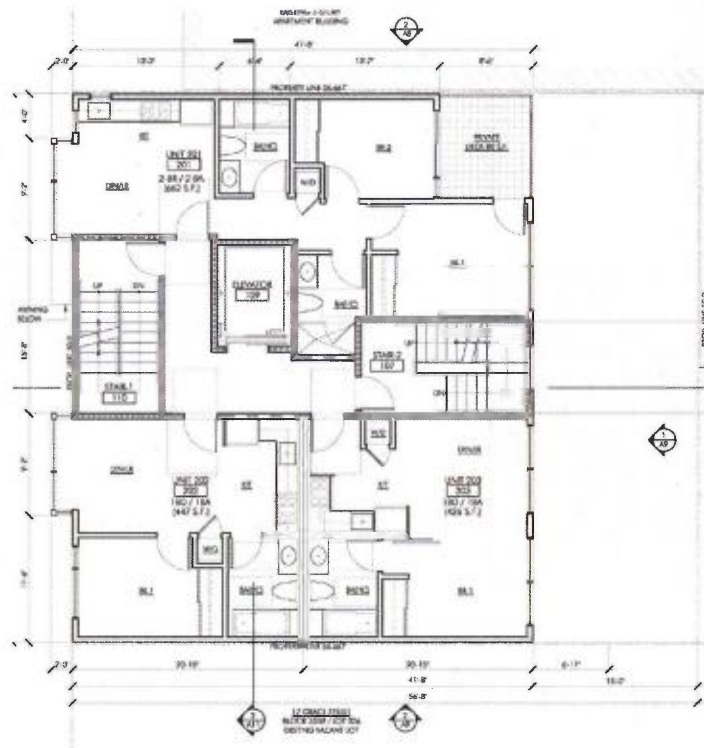
Source: San Francisco Planning Department



Figure 3: 15/23 Grace Street Proposed Ground and Second Floor Plans



1 | PROPOSED GROUND / FIRST FLOOR PLAN  
3/16"=1'-0"



2 | PROPOSED SECOND FLOOR PLAN  
3/16"=1'-0"

Figure 4: 15/23 Grace Street Proposed Third and Fourth Floor Plans

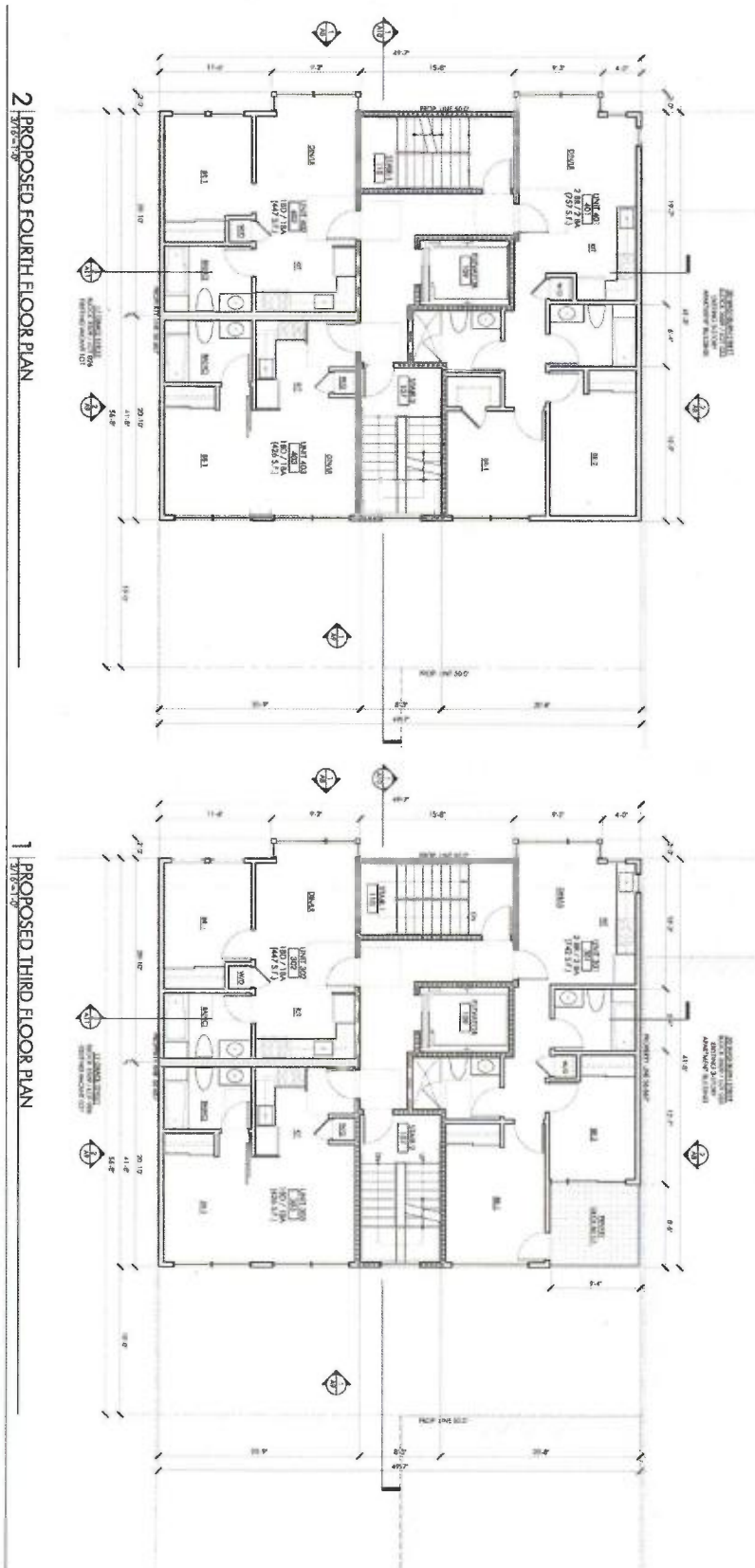
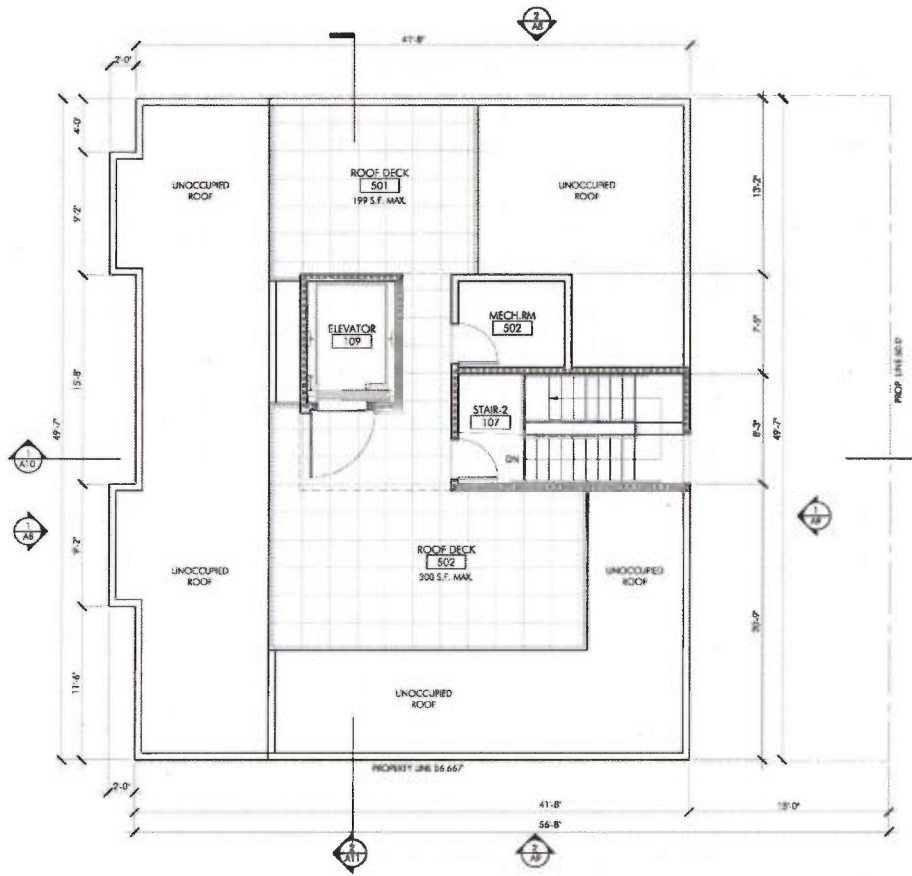


Figure 5: 15/23 Grace Street Proposed Roof Plan



**2** PROPOSED ROOF PLAN  
3/16"=1'-0"

Figure 6: Proposed South (Grace Street) Elevation

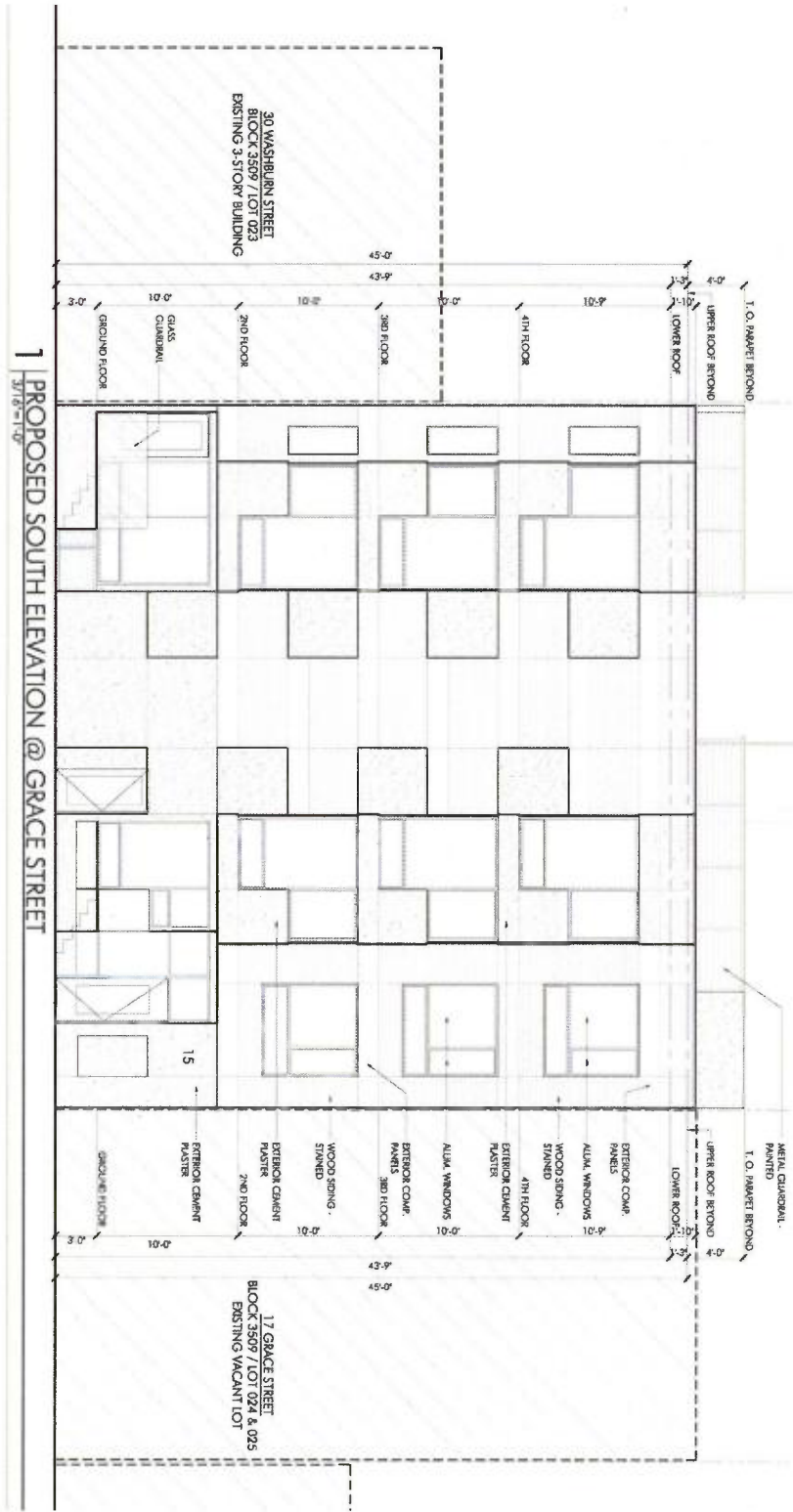




Figure 7: 17 Grace Street Proposed Ground Floor Plan



Figure 8: 17 Grace Street Proposed Second Floor Plan

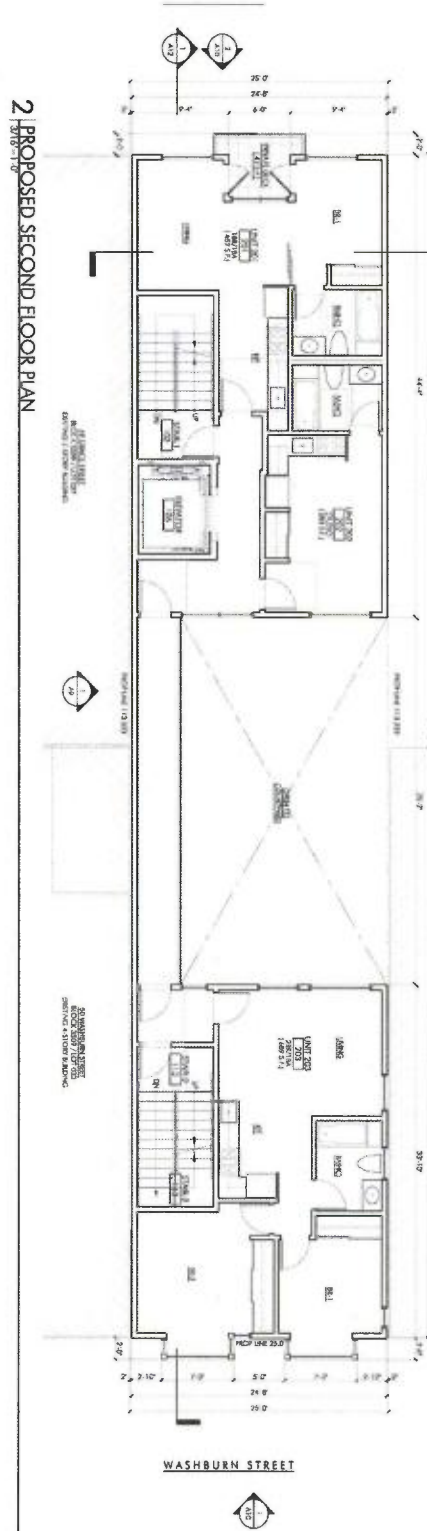


Figure 9: 17 Grace Street Proposed Third Floor Plan

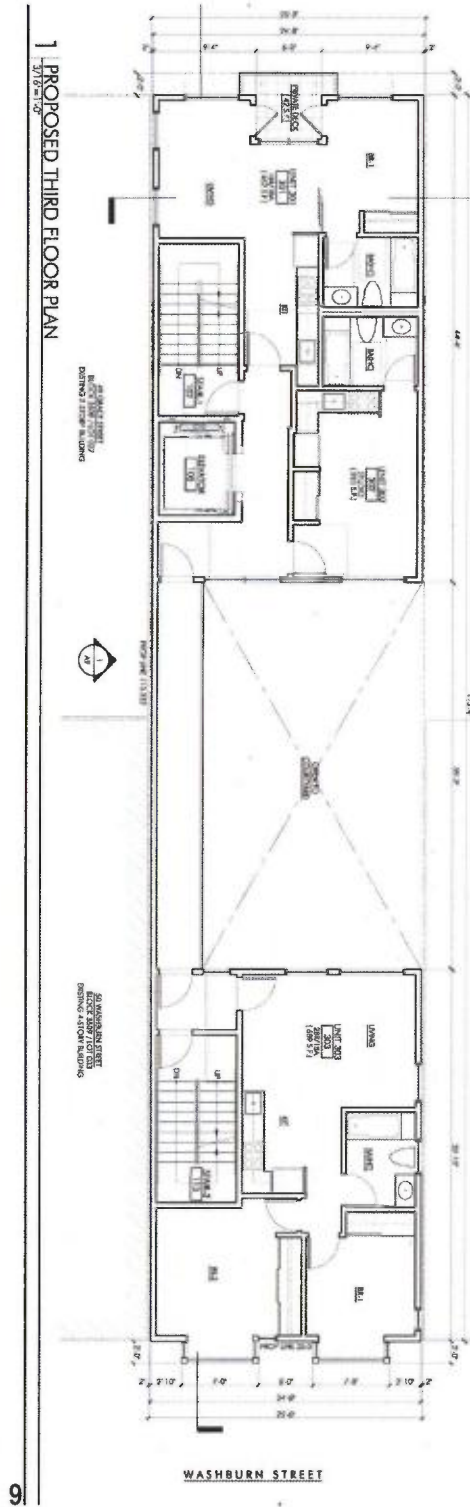




Figure 11: 17 Grace Street Proposed Roof Plan

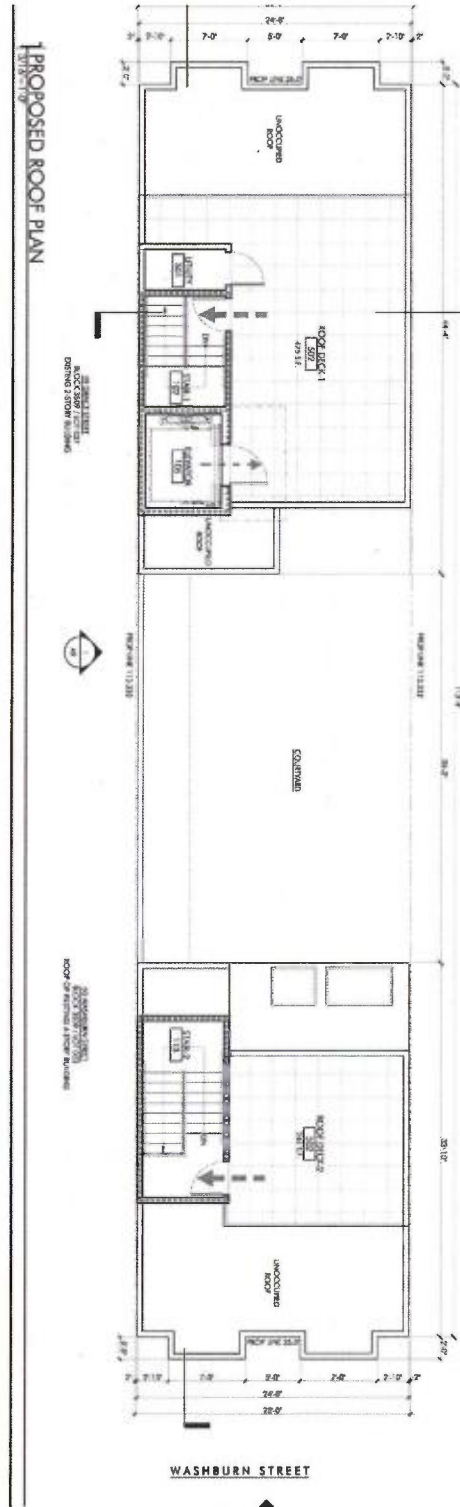


Figure 12: 17 Grace Street Proposed South (Grace Street) Elevation

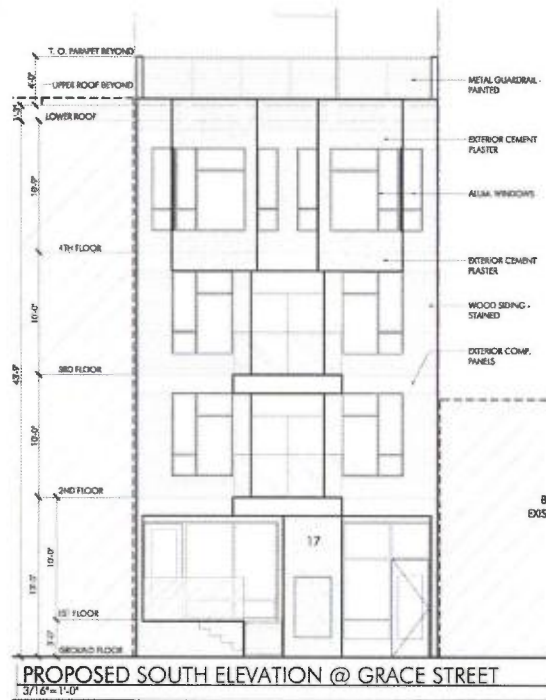
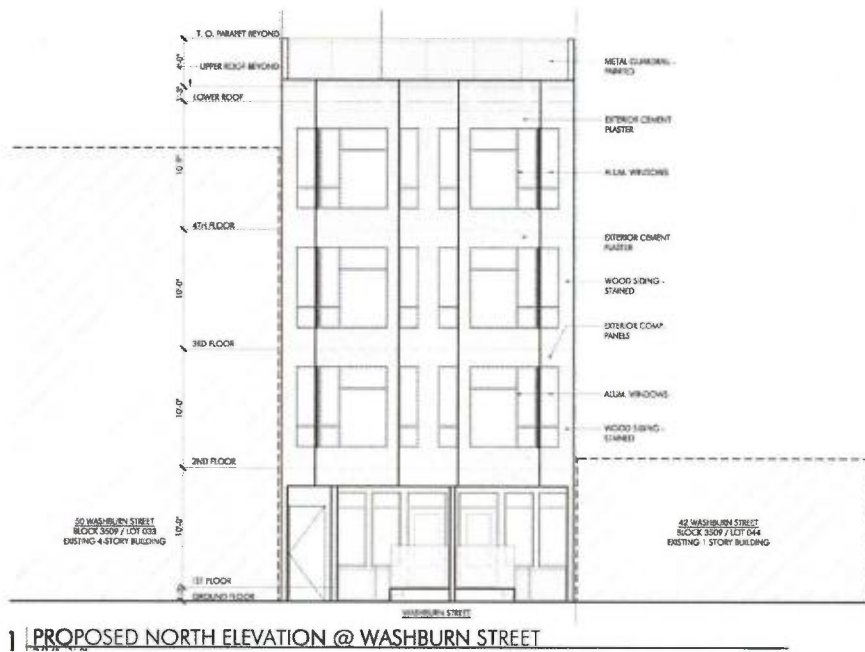


Figure 13: 17 Grace Street Proposed North (Washburn Street) Elevation



### **Aesthetics and Parking**

In accordance with CEQA section 21099 – Modernization of Transportation Analysis for Transit Oriented Projects – aesthetics and parking shall not be considered in determining if a project has the potential to result in significant environmental effects, provided the project meets all of the following three criteria:

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

The proposed project meets each of the above three criteria and thus, this checklist does not consider aesthetics or parking in determining the significance of project impacts under CEQA.<sup>5</sup> Project elevations are included in the project description.

### **Automobile Delay and Vehicle Miles Traveled**

In addition, CEQA section 21099(b)(1) requires that the State Office of Planning and Research (OPR) develop revisions to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects that “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” CEQA section 21099(b)(2) states that upon certification of the revised guidelines for determining transportation impacts pursuant to section 21099(b)(1), automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment under CEQA.

In January 2016, OPR published for public review and comment a [\*Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA\*](#)<sup>6</sup> recommending that transportation impacts for projects be measured using a vehicle miles traveled (VMT) metric. On March 3, 2016, in anticipation of the future certification of the revised CEQA Guidelines, the San Francisco Planning Commission adopted OPR’s recommendation to use the VMT metric instead of automobile delay to evaluate the transportation impacts of projects (Resolution 19579). Therefore, impacts and mitigation measures from the Western SoMa PEIR associated with automobile delay are not discussed in this checklist, including PEIR Mitigation Measures E-1: Traffic Signal Installation, E-2: Intelligent Traffic Management, E-3: Enhanced Funding, and E-4: Intelligent Traffic Management. Instead, a VMT analysis is provided in the Transportation section.

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<sup>5</sup> San Francisco Planning Department. Eligibility Checklist: CEQA section 21099 – Modernization of Transportation Analysis for 15-23 Grace Street and 17 Grace Street., June 14, 2017. This document (and all other documents cited in this report, unless otherwise noted), is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400 as part of Case File No. 2014.002016E.

<sup>6</sup> This document is available online at: [https://www.opr.ca.gov/s\\_sb743.php](https://www.opr.ca.gov/s_sb743.php).

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
<b>1. LAND USE AND LAND USE PLANNING— Would the project:</b>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial impact upon the existing character of the vicinity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Western SoMa PEIR determined that adoption of the Western SoMa Community Plan would not result in a significant impact related to land use. The Western SoMa PEIR anticipated that future development under the community plan would result in more cohesive neighborhoods and would include more clearly defined residential, commercial, and industrial areas. No mitigation measures were identified in the PEIR.

As a result of the Western SoMa Community Plan, the project site was rezoned from SLR (Service/Light Industrial/Residential District) to RED-MX (Residential Enclave, Mixed). The RED-MX permits residential dwelling units without specific density limitations, allowing physical controls such as height, bulk, and setbacks to control dwelling unit density.

The Western SoMa PEIR determined that implementation of the community plan would not create any new physical barriers in the plan area because the rezoning and community plan do not provide for any new major roadways, such as freeways, that would divide the project area or isolate individual neighborhoods within it.

The citywide planning and current planning divisions of the planning department have determined that the proposed project is permitted in the RED-MX, and is consistent with the bulk, density, and land uses envisioned in the Western SoMa Community Plan. The project falls within the Western SoMa RED-MX, envisioned as an area of primarily low-scale, medium density residential uses. As a medium-scale residential development, the proposed project is consistent with this designation.<sup>7,8</sup>

For these reasons, implementation of the proposed project would not result in either project-level or cumulative significant impacts that were not identified in the Western SoMa PEIR related to land use and land use planning.

<sup>7</sup> Susan Exline, San Francisco Planning Department, Community Plan Exemption Eligibility Determination, Citywide Planning Analysis, 15 Grace Street, October 19, 2015.

<sup>8</sup> Jeff Joslin, San Francisco Planning Department, Community Plan Exemption Eligibility Determination, Current Planning Analysis, 17 Grace Street, December 1, 2015.



<b>Topics:</b>	<b>Significant Impact Peculiar to Project or Project Site</b>	<b>Significant Impact not Identified in PEIR</b>	<b>Significant Impact due to Substantial New Information</b>	<b>No Significant Impact not Previously Identified in PEIR</b>
<b>2. POPULATION AND HOUSING— Would the project:</b>				
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

One of the objectives of the Western SoMa Community Plan is to identify appropriate locations for housing to meet the citywide demand for additional housing. The Western SoMa PEIR concluded that an increase in population in the plan area is expected to occur as a secondary effect of the proposed rezoning and that any population increase would not, in itself, result in adverse physical effects, but would serve to advance key city policy objectives, such as providing housing in appropriate locations next to downtown and other employment generators and furthering the city’s transit first policies. It was anticipated that the rezoning would result in an increase in both housing development and population in all of the community plan project area. The Western SoMa PEIR determined that the anticipated increase in population and density would not result in significant adverse physical effects on the environment. No mitigation measures were identified in the PEIR.

Implementation of the proposed project would result in 22 new residential units, two of which would be below market rate, which would increase the number of residents living within the Western SoMa area. These direct effects of the proposed project on population and housing are within the scope of the population and housing growth anticipated under the Western SoMa Community Plan, and evaluated in the Western SoMa PEIR.

For the above reasons, the proposed project would not result in significant project-level or cumulative impacts on population and housing growth that were not identified in the Western SoMa PEIR.

<b>Topics:</b>	<b>Significant Impact Peculiar to Project or Project Site</b>	<b>Significant Impact not Identified in PEIR</b>	<b>Significant Impact due to Substantial New Information</b>	<b>No Significant Impact not Previously Identified in PEIR</b>
<b>3. CULTURAL AND PALEONTOLOGICAL RESOURCES—Would the project:</b>				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Historic Architectural Resources**

Pursuant to CEQA Guidelines sections 15064.5(a)(1) and 15064.5(a)(2), historical resources are buildings or structures that are listed, or are eligible for listing, in the California Register of Historical Resources or are identified in a local register of historical resources, such as Articles 10 and 11 of the San Francisco Planning Code. The Western SoMa PEIR identified significant and unavoidable impacts related to causing a substantial adverse change in the significance of a historic resource through demolition.

The project site is currently a vacant lot within the Western SoMa Light Industrial and Residential Historic District. The Western SoMa Light Industrial and Residential Historic District is significant as a representation of a noteworthy trend in development patterns and the establishment of various ethnic groups in San Francisco, most notably the Greek community. Its significance is also rooted in the reconstruction of the South of Market area after the 1906 Earthquake and Fire. Reconstruction proceeded in several distinct periods, beginning with the initial flurry of building activity occurring between 1906 and 1913, with later waves occurring after the First World War between 1918 and 1920, and culminating with a major real estate boom in the mid-1920s. No other neighborhood in San Francisco contains such a concentration of small, light industrial buildings. The historic district's period of significance ranges from 1906 to 1936.

The project site is not individually eligible for listing in the California Register of Historic Places; however, the subject property is located within the boundaries of the eligible Western SoMa Light Industrial and Residential Historic District, which is a qualified historic resource for the purposes of CEQA. The historic district originally possessed 721 resources, of which 478 resources contribute to the district's historic character. These contributing resources include a wide variety of building types, including: large three- to six-story apartment buildings and residential hotels; multi-family wood-frame flats; small single-family dwellings; one- to three-story concrete commercial buildings; light industrial buildings; warehouses; civic buildings; and churches.

As a result of the above, the department evaluated the proposed project to ensure that it would not materially impair the historic district.<sup>9</sup> The department's evaluation found that the scale of the proposed project (four-story residential buildings) is compatible with the scale of the immediate neighborhood (two- to four-story industrial and residential buildings) and the massing, fenestration, and materials of the proposed project are common in the immediate area. The department finds that the proposed buildings are consistent with the historic massing and general character of the surrounding eligible historic district, as well as new construction within the district boundaries. Given the varied character of the district, the proposed buildings provide the appropriate references to the larger-scale industrial buildings, as evidenced by the overall design, massing, and scale. Overall, the proposed project is consistent with the district's mixed character and would not impact the district's character-defining features.

For these reasons, the proposed project would not result in significant project-level or cumulative impacts on historic architectural resources that were not identified in the Western SoMa PEIR.

### **Archeological Resources**

The Western SoMa PEIR determined that implementation of the community plan could result in significant impacts on archeological resources and identified two mitigation measures that would reduce these potential impacts to a less than-significant-level. Western SoMa PEIR Mitigation Measure M-CP-4a: Project-Specific Preliminary Archeological Assessment and M-CP-4b: Procedures for Accidental Discovery of Archeological Resources apply to projects involving any soils-disturbing or soils-improving activities including excavation to a depth of 5 or more feet below grade. Construction of the proposed building at 15/23 Grace Street would involve excavation to a maximum depth of 5 feet below ground surface and construction of the proposed building at 17 Grace Street would involve up to a maximum of 5 feet of excavation below ground surface. A total of approximately 283 cubic yards of soil would be removed from the site. Therefore, Mitigation Measures M-CP-4a and M-CP-4b apply to the project.

As part of project implementation of Mitigation Measure M-CP-4a, the Planning Department's archeologist conducted a Preliminary Archeology Review (PAR) for the proposed project.<sup>10</sup> The PAR determined that the project would be subject to Mitigation Measure M-CP-4b to reduce potential impacts from accidental discovery of buried archeological resources during project construction to a less than significant level. The project sponsor has agreed to implement M-CP-4b as **Project Mitigation Measure 1** (full text provided in the "Mitigation Measures" section below). The project would not result in significant impacts related to archeological resources with implementation of these mitigation measures.

### **Paleontological Resources**

The Western SoMa PEIR determined that implementation of the community plan would have low potential to uncover unique or significant fossils as geological materials that would be disturbed by construction excavations in the plan area would have little to no likelihood of containing unique or significant fossils. Therefore, the PEIR found less-than-significant impacts on paleontological resources. As documented in the geotechnical report prepared for the proposed project, the site is underlain by sand

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<sup>9</sup> SF Planning Department, *Preservation Team Review 15/23 and 17 Grace Street*, March 10, 2017.

<sup>10</sup> Randall Dean, San Francisco Planning Department, Archeological Log.

to depth of at least 15 feet.<sup>11</sup> Consistent with the determination in the PEIR that development in the plan area would not have a significant effect on unique paleontological resources, sand is unlikely to contain intact fossils. For the reasons above, the proposed project would not result in either project-level or cumulative significant impacts on cultural and paleontological resources that were not identified in the Western SoMa PEIR.

<u>Topics:</u>	<u>Significant Impact Peculiar to Project or Project Site</u>	<u>Significant Impact not Identified in PEIR</u>	<u>Significant Impact due to Substantial New Information</u>	<u>No Significant Impact not Previously Identified in PEIR</u>
<b>4. TRANSPORTATION AND CIRCULATION— Would the project:</b>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels, obstructions to flight, or a change in location, that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is not located within an airport land use plan area, or in the vicinity of a private airstrip. Therefore, initial study checklist topic 4c is not applicable.

The Western SoMa PEIR anticipated that growth resulting from the zoning changes would not result in significant impacts related to pedestrians, bicyclists, emergency access, or construction. As the proposed project is within the development projected under the Western SoMa Community Plan, there would be no additional impacts on pedestrians, bicyclists, emergency access, or construction beyond those analyzed in the Western SoMa PEIR. Transportation system improvements included as part of the Western SoMa Plan were identified to have significant impacts related to loading, but the impact was reduced to less-than-significant with mitigation.

<sup>11</sup> Capex Engineering Inc, *Geotechnical Investigation Report Proposed Two Five-Story Building[s] at 15-23 and 17 Grace Street*, February 22, 2015.

The Western SoMa PEIR anticipated that adoption of the Western SoMa Community Plan could result in significant impacts on traffic, transit, and loading, and identified four transportation mitigation measures. One mitigation measure reduced loading impacts to less-than-significant. Even with mitigation, however, it was anticipated that the significant adverse traffic impacts and the cumulative impacts on transit lines could not be fully mitigated. Thus, these impacts were found to be significant and unavoidable. As discussed above, in response to state legislation that called for removing automobile delay from CEQA analysis, the Planning Commission adopted resolution 19579 replacing automobile delay with a VMT metric for analyzing transportation impacts of a project. Therefore, impacts and mitigation measures from the Western SoMa PEIR associated with automobile delay are not discussed in this checklist.

The Western SoMa PEIR did not evaluate vehicle miles traveled or the potential for induced automobile travel. The VMT analysis presented below evaluates the project's transportation effects using the VMT metric.

### **Vehicle Miles Traveled (VMT) Analysis**

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

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

The San Francisco County Transportation Authority (Transportation Authority) uses the San Francisco Chained Activity Model Process (SF-CHAMP) to estimate VMT by private automobiles and taxis for different land use types. Travel behavior in SF-CHAMP is calibrated based on observed behavior from the California Household Travel Survey 2010-2012, Census data regarding automobile ownership rates and county-to-county worker flows, and observed vehicle counts and transit boardings. SF-CHAMP uses a synthetic population, which is a set of individual actors that represents the Bay Area's actual population, who make simulated travel decisions for a complete day. The Transportation Authority uses tour-based analysis for office and residential uses, which examines the entire chain of trips over the course of a day, not just trips to and from the project. For retail uses, the Transportation Authority uses trip-based analysis, which counts VMT from individual trips to and from the project (as opposed to entire chain of trips). A trip-based approach, as opposed to a tour-based approach, is necessary for retail projects because a tour is likely to consist of trips stopping in multiple locations, and the summarizing of tour VMT to each location would over-estimate VMT.<sup>12,13</sup>

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<sup>12</sup> To state another way: a tour-based assessment of VMT at a retail site would consider the VMT for all trips in the tour, for any tour with a stop at the retail site. If a single tour stops at two retail locations, for example, a coffee shop on the way to work and a restaurant on the way back home, then both retail locations would be allotted the

For residential development, the existing regional average daily VMT per capita is 17.2.<sup>14</sup> Refer to Table 1: Daily Vehicle Miles Traveled, which includes the transportation analysis zone in which the project site is located, 609.

**Table 1 Daily Vehicle Miles Traveled**

<u>Land Use</u>	<u>Existing</u>			<u>Cumulative 2040</u>		
	<u>Bay Area Regional Average</u>	<u>Bay Area Regional Average minus 15%</u>	<u>TAZ 609</u>	<u>Bay Area Regional Average</u>	<u>Bay Area Regional Average minus 15%</u>	<u>TAZ 609</u>
Households (Residential)	17.2	14.6	2.6	16.1	13.7	2.3

A project would have a significant effect on the environment if it would cause substantial additional VMT. The State Office of Planning and Research’s (OPR) *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA* (“proposed transportation impact guidelines”) recommends screening criteria to identify types, characteristics, or locations of projects that would not result in significant impacts to VMT. If a project meets one of the three screening criteria provided (Map-Based Screening, Small Projects, and Proximity to Transit Stations), then it is presumed that VMT impacts would be less than significant for the project and a detailed VMT analysis is not required. Map-Based Screening is used to determine if a project site is located within a transportation analysis zone that exhibits low levels of VMT; Small Projects are projects that would generate fewer than 100 vehicle trips per day; and the Proximity to Transit Stations criterion includes projects that are within a half mile of an existing major transit stop, have a floor area ratio of greater than or equal to 0.75, vehicle parking that is less than or equal to that required or allowed by the Planning Code without conditional use authorization, and are consistent with the applicable Sustainable Communities Strategy.

The proposed project would include 22 dwelling units in the proposed new buildings. Existing average daily VMT per capita is 2.6 for the transportation analysis zone the project site is located in, 609. This is 85 percent below the existing regional average daily VMT per capita of 17.2. Future 2040 average daily VMT per capita is 2.3 for the transportation analysis zone 609. This is 86 percent below the future 2040 regional average daily VMT per capita of 16.1.<sup>15</sup> Therefore, the proposed project would not cause substantial additional VMT and impacts would be less-than-significant impact.

**Trip Generation**

The proposed project involves the construction of two 45-foot-tall, four-story residential buildings approximately 8,000 square feet in size each. The proposed buildings would include a total of 22

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total four VMT. A trip-based approach allows us to apportion all retail-related VMT to retail sites without double-counting.

<sup>13</sup> San Francisco Planning Department, Executive Summary: Resolution Modifying Transportation Impact Analysis, Appendix F, Attachment A, March 3, 2016.

<sup>14</sup> Includes the VMT generated by the households in the development and averaged across the household population to determine VMT per capita.

<sup>15</sup> San Francisco Planning Department. Eligibility Checklist: CEQA section 21099 – Modernization of Transportation Analysis for 15/23 and 17 Grace Street, June 14, 2017.

residential units two of which would be below market rate. The proposed mix of units would be four studios, 10 one-bedroom units and eight two-bedroom units. The proposed buildings would include 22 Class 1 bicycle spaces at the ground-floor level and no on-site vehicle parking. Pedestrian and bicycle access would be from both Grace Street for 15/23 Grace Street and from Grace Street and Washburn Street for 17 Grace Street.

Localized trip generation of the proposed project was calculated using a trip-based analysis and information in the *2002 Transportation Impacts Analysis Guidelines for Environmental Review* (SF Guidelines) developed by the San Francisco Planning Department.<sup>16</sup> The proposed project would generate an estimated 185 person trips (inbound and outbound) on a weekday daily basis, consisting of 47 person trips by auto, 73 transit trips, 55 walk trips and 10 trips by other modes. During the p.m. peak hour, the proposed project would generate an estimated 32 person trips, consisting of 8 person trips by auto (6 vehicle trips accounting for vehicle occupancy data for this Census Tract), 13 transit trips, 9 walk trips and 2 trips by other modes.

### Transit

Western SoMa Mitigation Measure M-C-TR-2: Impose Development Impact Fees to Offset Transit Impacts was adopted to address significant transit impacts. Subsequently, as part of the Transportation Sustainability Program the San Francisco Board of Supervisors approved amendments to the San Francisco Planning Code, referred to as the Transportation Sustainability Fee (Ordinance 200-154, effective December 25, 2015). The Transportation Sustainability Fee updated, expanded, and replaced the prior Transit Impact Development Fee.

The SFMTA is implementing the Transit Effectiveness Project (TEP), which was approved by the SFMTA Board of Directors in March 2014. The TEP (now called Muni Forward) involved system-wide review and evaluation, and made recommendations to improve service and increase transportation efficiency. Service improvements have been made along several routes with the Western SoMa plan area, including the 14 and 14R transit lines.

San Francisco Transportation and Road Improvement Bond, Proposition A, approved in November 2014, authorized the city to borrow \$500 million through issuing general obligation bonds in order to meet transportation infrastructure needs of the city. The projects to be funded include Muni Forward projects; pedestrian, bicycle, and vehicle, safety programs; transit vehicle maintenance. San Francisco Adjusting Transportation Funding for Population Growth, Proposition B, also approved in November 2014, increases the base contribution to SFMTA by a percentage equal to the city's annual population increase.

The project site is located within a quarter mile of several local transit lines including Muni lines 6-Haight/Parnassus, 7-Haight/Noriega, 7R-Haight/Noriega Rapid, 9-San Bruno, 9R-San Bruno Rapid, 12-Folsom, 14-Mission, 14R-Mission Rapid, 19-Polk, and 21-Hayes bus lines, as well as Muni rail lines KT-K-Ingleside/T-Third Street, L-Taraval, M-Ocean View, and N-Judah. The proposed project would be expected to generate 73 daily transit trips, including 13 during the p.m. peak hour. Given the wide availability of nearby transit, the addition of 13 p.m. peak hour transit trips would be accommodated by existing capacity. As such, the proposed project would not result in unacceptable levels of transit service or cause a substantial increase in delays or operating costs such that significant adverse impacts in transit service could result.

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<sup>16</sup> San Francisco Planning Department, Transportation Calculations for 15/23 and 17 Grace Street, May 11, 2017.

The Western SoMa Community Plan PEIR identified less than significant impacts relating to exceedance of the capacity utilization standards for Muni lines or regional transit providers, or a substantial increase in delays or operating costs.

The proposed project's minor contribution of 13 p.m. peak hour transit trips would not be a substantial proportion of the overall transit volume generated by Western SoMa Community Plan area projects. The proposed project would not contribute considerably to cumulative transit conditions and thus, the proposed project would not result in any significant project-level or cumulative transit impacts that were not identified in the PEIR.

For the above reasons, the proposed project would not result in significant impacts that were not identified in the Western SoMa Community Plan PEIR related to transportation.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
<b>5. NOISE—Would the project:</b>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Be substantially affected by existing noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Western SoMa PEIR determined that implementation of the Western SoMa Area Plan would result in significant noise impacts during construction activities and due to conflicts between noise-sensitive uses in proximity to traffic-generated noise levels along major streets throughout the plan area. The Western SoMa PEIR identified six noise mitigation measures, three of which may be applicable to subsequent development projects.<sup>17</sup> These mitigation measures would reduce noise impacts from construction and noisy land uses to less-than-significant levels.

<sup>17</sup> Western SoMa PEIR Mitigation Measures M-NO-1a, M-NO-1b, and M-NO-1d address the siting of sensitive land uses in noisy environments. In a decision issued on December 17, 2015, the California Supreme Court held that



The proposed project would be subject to the following interior noise standards, which are described for informational purposes. The California Building Standards Code (Title 24) establishes uniform noise insulation standards. The Title 24 acoustical requirement for residential structures is incorporated into section 1207 of the San Francisco Building Code and requires these structures be designed to prevent the intrusion of exterior noise so that the noise level with windows closed, attributable to exterior sources, shall not exceed 45 dBA in any habitable room. In compliance with Title 24, DBI would review the final building plans to ensure that the building wall, floor/ceiling, and window assemblies meet Title 24 acoustical requirements. If determined necessary by DBI, a detailed acoustical analysis of the exterior wall and window assemblies may be required.

Mitigation Measure M-NO-1c: Siting of Noise-Generating Uses requires a noise analysis for new development including commercial, industrial, or other uses that would be expected to generate noise levels in excess of ambient noise in the project vicinity in order to reduce potential conflicts between existing sensitive receptors and new noise-generating uses. The proposed project is entirely residential and would not include noise generating uses. Therefore, Mitigation Measure M-NO-1c would not apply to the proposed project.

Mitigation Measures M-NO-2a: General Construction Noise Control Measures and M-NO-2b: Noise Control Measures during Pile Driving require implementation of noise controls during construction in order to reduce construction-related noise impacts. The proposed project would involve construction of two four-story, 45-foot-tall residential buildings and, therefore, would contribute to construction-related noise impacts. The project would be subject to Mitigation Measures M-NO-2a—detailed under **Project Mitigation Measure 2** in the “Mitigation Measures” section below—in order to reduce these impacts to a less-than-significant level. The proposed project does not include pile driving, so Mitigation Measure M-NO-2b would not apply to the proposed project.

In addition, all construction activities for the proposed project (occurring over the course of approximately 12 months) would be subject to the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code). The noise ordinance requires that construction work be conducted in the following manner: (1) noise levels of construction equipment, other than impact tools, must not exceed 80 dBA<sup>18</sup> (Ldn<sup>19</sup>) at a distance of 100 feet from the source (the equipment generating the noise); (2) impact

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CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents except where a project or its residents may exacerbate existing environmental hazards (California Building Industry Association v. Bay Area Air Quality Management District, December 17, 2015, Case No. S213478. Available at: <<http://www.courts.ca.gov/opinions/documents/S213478.PDF>>). As noted above, the Western SoMa PEIR determined that incremental increases in traffic-related noise attributable to implementation of the Western SoMa Area Plan would be less than significant, and thus would not exacerbate the existing noise environment. Therefore, Western SoMa PEIR Mitigation Measures M-NO-1a, M-NO-1b, and M-NO-1d are not applicable. Nonetheless, for all noise sensitive uses, the general requirements for adequate interior noise levels of Mitigation Measures M-NO-1a, M-NO-1b are met by compliance with the acoustical standards required under the California Building Standards Code (California Code of Regulations Title 24).

<sup>18</sup> The dBA, or A-weighted decibel, refers to a scale of noise measurement that approximates the range of sensitivity of the human ear to sounds of different frequencies. On this scale, the normal range of human hearing extends from about 0 dBA to about 140 dBA. A 10-dBA increase in the level of a continuous noise represents a perceived doubling of loudness.

tools must have intake and exhaust mufflers that are approved by the Director of the Department of Public Works or the Director of the Department of Building Inspection to best accomplish maximum noise reduction; and (3) if the noise from the construction work would exceed the ambient noise levels at the site property line by 5 dBA, the work must not be conducted between 8:00 p.m. and 7:00 a.m. unless the Director of San Francisco Public Works authorizes a special permit for conducting the work during that period.

The building department is responsible for enforcing the noise ordinance for private construction projects during normal business hours (8:00 a.m. to 5:00 p.m.). The police department is responsible for enforcing the noise ordinance during all other hours. Occupants of the nearby properties could be disturbed by project construction noise. Times may occur when noise could interfere with indoor activities in nearby residences and other businesses near the project site and may be considered an annoyance by occupants of nearby properties. However, the increase in noise in the project area during project construction would not be considered a significant impact, because the construction noise would be temporary (approximately 12 months), intermittent, and restricted in occurrence and level, because the contractor would be subject to the noise ordinance. Compliance with the noise ordinance would reduce any construction-related noise effects on nearby residences.

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

For the above reasons, the proposed project would not result in significant noise impacts that were not identified in the Western SoMa PEIR.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
<b>6. AIR QUALITY—Would the project:</b>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>19</sup> The Ldn is the Leq, or Energy Equivalent Level, of the A-weighted noise level over a 24-hour period with a 10 dB penalty applied to noise levels between 10:00 p.m. to 7:00 a.m. The Leq is the level of a steady noise which would have the same energy as the fluctuating noise level integrated over the time period of interest.

The Western SoMa PEIR identified significant and unavoidable impacts related to violation of an air quality standard, uses that emit diesel particulate matter (DPM), exposure of sensitive land uses to substantial pollutant concentrations, and construction emissions. The Western SoMa PEIR identified five mitigation measures that would help reduce air quality impacts; however, due to the uncertain nature of future development proposals that would result from adoption of the Western SoMa Community Plan, it could not be determined whether implementation of these mitigation measures would reduce impacts to less-than-significant levels.

### **Construction Dust Control**

To reduce construction dust impacts, the San Francisco Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes, generally referred to as the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008). The intent of the Construction Dust Control Ordinance is to reduce the quantity of dust generated during site preparation, demolition, and construction work in order to protect the health of the general public and of on-site workers, minimize public nuisance complaints, and to avoid orders to stop work by DBI. Construction activities from the proposed project would result in dust, primarily from ground-disturbing activities. The proposed project would be subject to the Construction Dust Control Ordinance, which would ensure that these impacts would remain less than significant.

### **Criteria Air Pollutants**

The Bay Area Air Quality Management District (BAAQMD) is the regional agency with jurisdiction over the nine-county San Francisco Bay Area Air Basin. As part of its *CEQA Air Quality Guidelines (Air Quality Guidelines)*, the BAAQMD developed screening criteria for determining whether a project's criteria air pollutant emissions 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.<sup>20</sup> Pursuant to the *Air Quality Guidelines*, projects that meet the screening criteria do not have a significant impact related to criteria air pollutants. Criteria air pollutant emissions during construction and operation of the proposed project would meet the *Air Quality Guidelines* screening criteria. The proposed project, with a total of 22 dwelling units, is below both the construction screening criterion and the operational screening criterion for the "apartment, mid-rise" land use type (which are 240 units and 494 units, respectively). Therefore, Western SoMa Mitigation Measure M-AQ-6 does not apply to the proposed project. The proposed project would not have a significant impact related to criteria air pollutants, and a detailed air quality assessment is not required.

PEIR Mitigation Measure M-AQ-2: Transportation Demand Management Strategies for Future Development Projects, is required for projects generating more than 3,500 daily vehicle trips, resulting in excessive criteria pollutant emissions. The proposed project would generate about 37 daily vehicle trips. Therefore, PEIR Mitigation Measure M-AQ-2 is not applicable to the proposed project.

### **Health Risk**

Subsequent to certification of the Western SoMa PEIR, the San Francisco Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes (Ordinance No. 224-14, effective December 8, 2014), generally referred to as Health Code Article 38: Enhanced Ventilation Required for

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<sup>20</sup> Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, updated May 2011, pp. 3-2 to 3-3.

Urban Infill Sensitive Use Developments (Article 38). The purpose of Article 38 is to protect the public health and welfare by establishing an Air Pollutant Exposure Zone (APEZ) and imposing an enhanced ventilation requirement for all urban infill sensitive use development within the APEZ. The project site is within an APEZ. The APEZ, as defined in Article 38, consists of areas that, based on modeling of all known air pollutant sources, exceed health protective standards for cumulative PM<sub>2.5</sub> concentration and cumulative excess cancer risk. The APEZ incorporates health vulnerability factors and proximity to freeways. Projects within the APEZ, such as the proposed project, 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.

### Construction

The project site is located within an identified Air Pollutant Exposure Zone; therefore, the ambient health risk to sensitive receptors from air pollutants is considered substantial. The proposed project would require heavy-duty off-road diesel vehicles and equipment during 6 months of the anticipated 11-month construction period. Therefore, the proposed project's temporary and variable construction activities would result in short-term emissions of DPM and other TACs that would add emissions to areas already adversely affected by poor air quality. As a result, Western SoMa PEIR Mitigation Measure M-AQ-7 (Construction Emissions Minimization Plan for Health Risks and Hazards) is applicable to the project, and is detailed under **Project Mitigation Measure 3** (see full text of this measure in the "Mitigation Measures" section, below). Mitigation Measure M-AQ-7 requires, among other things, diesel equipment to meet a minimum performance standard (all engines greater than 25 horsepower must meet Tier 2 emissions standards and be equipped with a Level 3-verified diesel emissions control strategy. Compliance with this mitigation measure would result in less-than-significant air quality impacts from construction vehicles and equipment. The project sponsor has agreed to implement **Project Mitigation Measure 3**.

### Siting Sensitive Land Uses

For sensitive use projects within the APEZ as defined by Article 38, such as the proposed project, the ordinance requires that the project sponsor submit an Enhanced Ventilation Proposal for approval by the Department of Public Health (DPH) that achieves protection from PM<sub>2.5</sub> (fine particulate matter) equivalent to that associated with a Minimum Efficiency Reporting Value 13 filtration. The Department of Building Inspection (DBI) will not issue a building permit without written notification from the Director of the DPH that the applicant has an approved Enhanced Ventilation Proposal.

In compliance with Article 38, the project sponsor submitted an initial application to the DPH.<sup>21</sup> The regulations and procedures set forth in Article 38 would ensure that exposure to sensitive receptors would not be significant. These requirements supersede the provisions of PEIR Mitigation Measure M-AQ-3: Reduction in Exposure to Toxic Air Contaminants for New Sensitive Receptors. Therefore, PEIR Mitigation Measure M-AQ-3 is no longer applicable to the proposed project, and impacts related to siting new sensitive land uses would be less than significant through compliance with Article 38.

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<sup>21</sup> Application for Article 38 Compliance Assessment, 17 Grace Street, September 6, 2015.

**Siting New Sources**

PEIR Mitigation Measure M-AQ-4: Siting of Uses that Emit PM<sub>2.5</sub> or DPM and Other TACs, requires analysis of operational emissions for new development that would generate substantial levels of TACs as part of everyday operations, whether from stationary or mobile sources. The proposed project would not generate substantial levels of TACs from mobile or stationary sources, such as more than 10,000 vehicle trips per day, more than 100 truck trips per day, or more than 40 refrigerated truck trips per day. In addition, the proposed project would not include a backup diesel generator. For these reasons, PEIR Mitigation Measure M-AQ-4 is not applicable to the proposed project.

**Conclusion**

For the above reasons, the proposed project would not result in significant impacts on air quality that were not identified in the Western SoMa PEIR.

Topics:	Significant Impact Peculiar to Project or Project Site	Significant Impact not Identified in PEIR	Significant Impact due to Substantial New Information	No Significant Impact not Previously Identified in PEIR
<b>7. GREENHOUSE GAS EMISSIONS—Would the project:</b>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Western SoMa PEIR assessed the Greenhouse Gas (GHG) emissions that could result from implementation of the Western SoMa Community Plan. The PEIR concluded that the resulting GHG emissions from plan implementation would be less than significant. No mitigation measures were identified in the PEIR.

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 and allow for projects that are consistent with an adopted GHG reduction strategy to conclude that the project’s GHG impact is less than significant. San Francisco’s *Strategies to Address Greenhouse Gas Emissions*<sup>22</sup> presents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco’s GHG reduction strategy in compliance with the BAAQMD and CEQA guidelines. These GHG reduction actions have resulted in a 23.3 percent reduction in GHG emissions in 2012 compared to 1990 levels,<sup>23</sup> exceeding the year 2020 reduction goals outlined in the BAAQMD’s *2010 Clean Air Plan*,<sup>24</sup> Executive

<sup>22</sup> San Francisco Planning Department, *Strategies to Address Greenhouse Gas Emissions in San Francisco*, November 2010. Available at [http://sfmea.sfplanning.org/GHG\\_Reduction\\_Strategy.pdf](http://sfmea.sfplanning.org/GHG_Reduction_Strategy.pdf), accessed March 3, 2016.

<sup>23</sup> ICF International, *Technical Review of the 2012 Community-wide Inventory for the City and County of San Francisco*, January 21, 2015.

<sup>24</sup> Bay Area Air Quality Management District, *Clean Air Plan*, September 2010. Available at <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>, accessed March 3, 2016.

Order S-3-05<sup>25</sup>, and Assembly Bill 32 (also known as the Global Warming Solutions Act).<sup>26,27</sup> In addition, San Francisco's GHG reduction goals are consistent with, or more aggressive than, the long-term goals established under Executive Orders S-3-05<sup>28</sup> and B-30-15.<sup>29,30</sup> Therefore, projects that are consistent with San Francisco's GHG Reduction Strategy would not result in GHG emissions that would have a significant effect on the environment and would not conflict with state, regional, and local GHG reduction plans and regulations.

The proposed project would increase the intensity of use of the site by adding 22 residential units on a site currently used as a surface parking lot. 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, wastewater treatment, and solid waste disposal. Construction activities would also result in temporary increases in GHG emissions.

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

Compliance with the City's bicycle parking requirements would reduce the proposed project's transportation-related emissions. These regulations reduce GHG emissions from single-occupancy vehicles by promoting the use of alternative transportation modes with zero or lower GHG emissions on a per capita basis.

The proposed project would be subject to the energy efficiency requirements of the City's Green Building Code, Stormwater Management Ordinance, Irrigation ordinances, and Energy Conservation Ordinance, which would promote energy and water efficiency, thereby reducing the proposed project's energy-related GHG emissions.<sup>31</sup> Additionally, the project would be required to meet the renewable energy criteria of the Green Building Code, further reducing the project's energy-related GHG emissions.

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<sup>25</sup> Office of the Governor, *Executive Order S-3-05*, June 1, 2005. Available at <https://www.gov.ca.gov/news.php?id=1861>, accessed March 3, 2016.

<sup>26</sup> California Legislative Information, *Assembly Bill 32*, September 27, 2006. Available at [http://www.leginfo.ca.gov/pub/05-06/bill/asm/ab\\_0001-0050/ab\\_32\\_bill\\_20060927\\_chaptered.pdf](http://www.leginfo.ca.gov/pub/05-06/bill/asm/ab_0001-0050/ab_32_bill_20060927_chaptered.pdf), accessed March 3, 2016.

<sup>27</sup> Executive Order S-3-05, Assembly Bill 32, and the Bay Area 2010 Clean Air Plan set a target of reducing GHG emissions to below 1990 levels by year 2020.

<sup>28</sup> 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 MTCO<sub>2</sub>E); by 2020, reduce emissions to 1990 levels (approximately 427 million MTCO<sub>2</sub>E); and by 2050 reduce emissions to 80 percent below 1990 levels (approximately 85 million MTCO<sub>2</sub>E).

<sup>29</sup> Office of the Governor, *Executive Order B-30-15*, April 29, 2015. Available at <https://www.gov.ca.gov/news.php?id=18938>, accessed March 3, 2016. Executive Order B-30-15 sets a state GHG emissions reduction goal of 40 percent below 1990 levels by the year 2030.

<sup>30</sup> San Francisco's GHG reduction goals are codified in section 902 of the Environment Code and include: (i) by 2008, determine City GHG emissions for year 1990; (ii) by 2017, reduce GHG emissions by 25 percent below 1990 levels; (iii) by 2025, reduce GHG emissions by 40 percent below 1990 levels; and by 2050, reduce GHG emissions by 80 percent below 1990 levels.

<sup>31</sup> Compliance with water conservation measures reduce the energy (and GHG emissions) required to convey, pump and treat water required for the project.

The proposed project’s waste-related emissions would be reduced through compliance with the City’s Recycling and Composting Ordinance, and Green Building Code requirements. These regulations reduce the amount of materials sent to a landfill, reducing GHGs emitted by landfill operations. These regulations also promote reuse of materials, conserving their embodied energy<sup>32</sup> and reducing the energy required to produce new materials.

Compliance with the City’s Street Tree Planting requirements would serve to increase carbon sequestration. Other regulations, including those limiting refrigerant emissions and the Wood Burning Fireplace Ordinance would reduce emissions of GHGs and black carbon, respectively. Regulations requiring low-emitting finishes would reduce volatile organic compounds (VOCs).<sup>33</sup> Thus, the proposed project was determined to be consistent with San Francisco’s GHG reduction strategy.<sup>34</sup>

Therefore, the proposed project’s GHG emissions would not conflict with state, regional, and local GHG reduction plans and regulations. Furthermore, the proposed project is within the scope of the development evaluated in the PEIR and would not result in impacts associated with GHG emissions beyond those disclosed in the PEIR. For the above reasons, the proposed project would not result in significant GHG emissions that were not identified in the Western SoMa PEIR and no mitigation measures are necessary.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
<b>8. WIND AND SHADOW—Would the project:</b>				
a) Alter wind in a manner that substantially affects public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Wind**

The Western SoMa PEIR determined that implementation of the Western SoMa Community Plan would have a potentially significant impact related to the alteration of wind in a manner that would substantially affect public areas. However, the PEIR determined that this impact could be reduced to a less-than-significant level with implementation of Mitigation Measure M-WS-1: Screening-Level Wind Analysis and Wind Testing, which would require a wind analysis for any new structures within the community plan area that have a proposed height of 80 feet or taller.

Based upon experience of the Planning Department in reviewing wind analyses and expert opinion on other projects, it is generally the case that projects less than 80 feet in height do not have significant wind impacts. The proposed 45-foot-tall buildings would be three stories taller than an adjacent one-story

<sup>32</sup> Embodied energy is the total energy required for the extraction, processing, manufacture and delivery of building materials to the building site.

<sup>33</sup> While not a GHG, VOCs are precursor pollutants that form ground level ozone. Increased ground level ozone is an anticipated effect of future global warming that would result in added health effects locally. Reducing VOC emissions would reduce the anticipated local effects of global warming.

<sup>34</sup> San Francisco Planning Department, *Greenhouse Gas Analysis: Compliance Checklist for 15-23 Grace Street*, September 18, 2015

building to the south and compatible with other surrounding three-story and four-story buildings in the vicinity. Because the proposed buildings would be less than 80 feet tall and would not be substantially taller than other existing buildings in the area, the proposed project would not contribute to the significant wind impact identified in the Western SoMa PEIR, and Mitigation Measure M-WS-1 is not applicable.

For the above reasons, the proposed project is not anticipated to cause significant project-level or cumulative wind impacts that were not identified in the Western SoMa PEIR.

**Shadow**

Planning Code section 295 generally prohibits new structures above 40 feet in height that would cast additional shadows on open space that is under the jurisdiction of the San Francisco Recreation and Park Commission between one hour after sunrise and one hour before sunset, at any time of the year, unless that shadow would not result in a significant adverse effect on the use of the open space. The Western SoMa PEIR determined that implementation of the Western SoMa Community Plan would have a significant and unavoidable impact related to the creation of new shadows in a manner that would substantially affect outdoor recreation facilities or other public areas. No mitigation measures were identified in the PEIR.

The proposed project includes the construction of two 45-foot-tall buildings (54 feet including the elevator penthouse). Therefore, the Planning Department prepared a preliminary shadow fan analysis to determine whether the proposed project would have the potential to cast new shadow on nearby parks. The shadow fan analysis prepared by the Department found that the project as proposed would not cast shadows on Recreation and Parks Department parks or other public parks.<sup>35</sup>

The proposed project would shade portions of nearby streets and sidewalks and private property at times within the project vicinity. Shadows upon streets and sidewalks would not exceed levels commonly expected in urban areas and would be considered a less-than-significant effect under CEQA. Although occupants of nearby properties 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.

In light of the above, the project would not contribute to the significant project-level or cumulative shadow impacts identified in the Western SoMa PEIR.

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
<b>9. RECREATION—Would the project:</b>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>35</sup> San Francisco Planning Department, *PPA Letter for 17 Grace Street* (2014-002016PPA).



<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
c) Physically degrade existing recreational resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Western SoMa PEIR determined that implementation of the Western SoMa Community Plan would not result in substantial or accelerated deterioration of existing recreational resources or require the construction or expansion of recreational facilities that may have an adverse effect on the environment. No mitigation measures were identified in the PEIR.

An update of the Recreation and Open Space Element (ROSE) of the General Plan was adopted in April 2014. The amended ROSE provides a 20-year vision for open spaces in the City. It includes information and policies about accessing, acquiring, funding, and managing open spaces in San Francisco. The amended ROSE identifies areas within the Western SoMa Community Plan area for acquisition and the locations where new open spaces and open space connections should be built. In addition, the amended ROSE identifies the role of both the Better Streets Plan<sup>36</sup> and the Green Connections Network in open space and recreation. Green Connections are special streets and paths that connect people to parks, open spaces, and the waterfront, while enhancing the ecology of the street environment. The Tenderloin to Potrero (Route 18) Green Connection route crosses the Western SoMa Community Plan area.

Furthermore, the planning code requires a specified amount of new usable open space (either private or common) for each new residential unit. Some developments are also required to provide privately owned, publicly accessible open spaces. The planning code open space requirements would help offset some of the additional open space needs generated by increased residential population to the project area.

The proposed project also includes private open spaces for the use of residents. The 15/23 Grace Street project includes four units with private decks, as well as approximately 500 square feet of roof deck for the use of all residents and an approximately 700-square-foot rear yard. The 17 Grace Street project includes one unit with a private deck, an approximately 710-square-foot internal courtyard on the ground floor, and two roof decks (475 square feet and 245 square feet) for the use of all residents.

Because the proposed project would not degrade recreational facilities and is consistent with the development density established under the Western SoMa Community Plan, there would be no additional project-level or cumulative impacts on recreation beyond those analyzed in the Western SoMa PEIR.

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<sup>36</sup> The Better Streets Plan provides a blueprint for the future of San Francisco’s pedestrian environment. It describes a vision, creates design guidelines, and identifies next steps to create a truly great pedestrian realm. The Plan seeks to balance the needs of all street users, and reflects the understanding that the pedestrian environment is about much more than just transportation – that streets serve a multitude of social, recreational and ecological needs that must be considered when deciding on the most appropriate design. The Better Streets Plan is available at [http://www.sf-planning.org/ftp/BetterStreets/proposals.htm#Final\\_Plan](http://www.sf-planning.org/ftp/BetterStreets/proposals.htm#Final_Plan) (accessed June 14, 2017).

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
<b>10. UTILITIES AND SERVICE SYSTEMS—Would the project:</b>				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Western SoMa PEIR determined that the anticipated increase in population would not result in a significant impact to the provision of water, wastewater collection and treatment, and solid waste collection and disposal. No mitigation measures were identified in the PEIR.

In June 2011, the San Francisco Public Utilities Commission adopted the 2010 update to the City's Urban Water Management Plan. The updated plan includes city-wide water supply demand projections to the year 2035, compares available water supplies to meet demand and presents water demand management measures to reduce long-term water demand. Additionally, the plan includes a discussion of the conservation requirement set forth in Senate Bill 7 passed in November 2009 mandating a statewide 20-percent reduction in per capita water use by 2020. The plan includes a quantification of the City's water use reduction targets and plan for meeting these objectives. The plan projects sufficient water supply in normal years and a supply shortfall during prolonged droughts. Plans are in place to institute varying degrees of water conservation and rationing as needed in response to severe droughts.

In addition, the SFPUC is in the process of implementing the Sewer System Improvement Program, which is a 20-year, multi-billion dollar citywide upgrade to the City's sewer and stormwater infrastructure to ensure a reliable and seismically safe system. The program includes planned improvements that will serve development in the Eastern Neighborhoods Plan area including at the southeast treatment plant, the central bayside system, and green infrastructure projects, such as the Mission and Valencia Green Gateway.

Because the proposed project is consistent with the development density established under the Western SoMa Community Plan, there would be no additional project-level or cumulative impacts on utilities and service systems beyond those analyzed in the Western SoMa PEIR.

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
<b>11. PUBLIC SERVICES—Would the project:</b>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Western SoMa PEIR determined that the anticipated increase in population would not result in a substantial adverse physical impacts associated with the provision of or need for new or physically altered public services, including fire protection, police protection, and public schools. No mitigation measures were identified in the PEIR.

Because the proposed project is consistent with the development density established under the Western SoMa Community Plan, there would be no additional project-level or cumulative impacts on public services beyond those analyzed in the Western SoMa PEIR.

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
<b>12. BIOLOGICAL RESOURCES—Would the project:</b>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

As discussed in the Western SoMa PEIR, the Western SoMa Community Plan Area is almost fully developed with buildings and other improvements such as streets and parking lots. Most of the project area consists of structures that have been in industrial use for many years. As a result, landscaping and other vegetation is sparse, except for a few parks. Because future development projects under the Western SoMa Community Plan would largely consist of new construction of mixed-uses in these heavily built-out former industrial neighborhoods, vegetation loss or disturbance of wildlife other than common urban species would be minimal. Therefore, the Western SoMa PEIR concluded that implementation of the Plan would not result in any significant effects related to riparian habitat, wetlands, movement of migratory species, local policies or ordinances protecting biological resources, or habitat conservation plans.

The Western SoMa PEIR determined that the Western SoMa Community Plan would result in significant but mitigable impacts on special-status birds and bats that may be nesting in trees or roosting in buildings that are proposed for removal/demolition as part of an individual project. The proposed project site is a paved surface parking lot, no demolition or removal of trees is proposed, and the proposed project consistent with the development density established under the Western SoMa Community Plan. Therefore, there would be no project-level or cumulative impacts on biological resources beyond those analyzed in the Western SoMa PEIR.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
<b>13. GEOLOGY AND SOILS—Would the project:</b>				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Topics:	Significant Impact Peculiar to Project or Project Site	Significant Impact not Identified in PEIR	Significant Impact due to Substantial New Information	No Significant Impact not Previously Identified in PEIR
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Change substantially the topography or any unique geologic or physical features of the site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Western SoMa PEIR concluded that the project would indirectly increase the population that would be subject to an earthquake, including seismically induced ground-shaking, liquefaction, and landslides. The PEIR also noted that new development is generally safer than comparable older development due to improvements in building codes and construction techniques. Compliance with applicable codes and recommendations made in project-specific geotechnical analyses would not eliminate earthquake risk, but would reduce them to an acceptable level, given the seismically active characteristics of the Bay Area. Therefore, the PEIR concluded that the project would not result in significant impacts related to geological hazards. No mitigation measures were identified in the PEIR.

A geotechnical investigation was prepared for the proposed project.<sup>37</sup> The geotechnical report states that the primary geotechnical concern at the project site is that the project site is located within a liquefaction zone. The geotechnical investigation concluded, however, that liquefaction potential at this site is “nil” and the proposed buildings could be supported on a concrete slab on grade provided the slab is structurally reinforced and underlain by a minimum of four inches of granular material conforming to Caltrans Class II specifications. Construction of the proposed project would not involve piling driving.

The proposed project would be required to conform to the San Francisco Building Code, which ensures the safety of all new construction in the city. Therefore, potential damage to structures from geologic hazards such as landslide hazards and seismic stability of the project site would be addressed through the building code requirement for a geotechnical or other subsurface report and review of the building permit application.

In light of the above, the proposed project would not result in a significant effect related to seismic and geologic hazards. Therefore, the proposed project would not result in significant project-level or

<sup>37</sup> Capex Engineering, Inc., *Geotechnical Investigation, Proposed Two Five-Story Building [sic] at 15/23 and 17 Grace Street, San Francisco, California*. February 22, 2015.

cumulative impacts related to geology and soils that were not identified in the Western SoMa PEIR, and no mitigation measures are necessary.

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
<b>14. HYDROLOGY AND WATER QUALITY—Would the project:</b>				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Western SoMa PEIR determined that the anticipated increase in population would not result in a significant impact to hydrology and water quality, including the combined sewer system and the potential for combined sewer outflows. No mitigation measures were identified in the PEIR.

The existing lot is entirely covered by impervious surfaces. In accordance with the San Francisco Stormwater Management Ordinance (Ordinance No. 83-10), the proposed project would be subject to the City's stormwater design guidelines, which require the project sponsor to incorporate low impact design approaches and stormwater management systems into the project. The proposed rear yard for 15/23 Grace Street, and the proposed courtyard of 17 Grace Street, which would total approximately 5,670 square feet, would use pervious surface materials. As a result, the proposed project would reduce the amount of impervious surface area on the site, which in turn would decrease the amount of runoff and drainage. Therefore, the proposed project would not adversely affect runoff and drainage.

For the above reasons, the proposed project would not result in any significant project-level or cumulative impacts related to hydrology and water quality that were not identified in the Western SoMa PEIR.

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
<b>15. HAZARDS AND HAZARDOUS MATERIALS— Would the project:</b>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Western SoMa PEIR identified less-than-significant impacts related to the routine transport, use, or disposal of hazardous materials, the potential for the plan or subsequent development projects within the plan area to interfere with an adopted emergency response plan, and the potential for subsequent projects to expose people or structures to a significant risk with respect to fires.

### *Hazardous Building Materials*

The proposed project would not involve the demolition of any structures. Therefore, the proposed project would not result in significant project-level or cumulative impacts that were not identified in the Western SoMa PEIR related to hazardous building materials.

### *Soil and Ground Water Contamination*

The Western SoMa PEIR identified potentially significant impacts related to exposing the public or the environment to unacceptable levels of hazardous materials as a result of subsequent projects within the Plan Area. The PEIR determined that Mitigation Measure M-HZ-3: Site Assessment and Corrective Action would reduce these impacts to a less-than-significant level.

Subsequent to the certification of the Western SoMa PEIR, the San Francisco Board of Supervisors amended Health Code Article 22A, which is administered and overseen by the Department of Public Health and is also known as the Maher Ordinance. Amendments to the Maher Ordinance became effective August 24, 2013, and require that sponsors for projects that disturb more than 50 cubic yards of soil to retain the services of a qualified professional to prepare a *phase I environmental site assessment* that meets the requirements of Health Code section 22.A.6. The proposed project, which is located on the Maher Map<sup>38</sup>, would excavate up to 5 feet below ground surface and disturb approximately 283 cubic yards of soil. Therefore, the project is subject to the Maher Ordinance. Mitigation Measure M-HZ-3 of the Western SoMa PEIR related to contaminated soil and groundwater is therefore superseded by the Maher Ordinance.

In compliance with the Maher Ordinance, the project sponsor has submitted a permit application to the health department and prepared phase I environmental site assessments to assess the potential for site contamination.<sup>39,40</sup> According to the site assessment for 17 Grace Street, the project site has been a vacant lot since 1949, and contained residences from 1889 to at least 1946. The property has never been used for commercial purposes, manufacturing, repair or any other use associated with hazardous materials usage, storage, manufacturing or disposal. The assessment found no evidence of *recognized environmental conditions, controlled recognized environmental conditions or historical recognized environmental conditions* at the site, and recommended no further investigation of the property. The site assessment for 15/23 Grace Street found that the property was occupied by a residence by 1913, and from 1931 to 1955, the property consisted of a vacant lot and a commercial building occupied by Art Metal Works. By 1956, the property was identified as consisting of two vacant lots. The assessment found no evidence of *recognized environmental conditions, controlled recognized environmental conditions or historical recognized environmental conditions* at the site, and recommended no further investigation of the property.

The health department will review the site assessment and determine whether further site investigation or clean up actions are required in accordance with the Maher Ordinance. Therefore, the proposed project would not result in significant project-level or cumulative impacts that were not identified in the Western SoMa PEIR related to hazardous materials that were not identified in the Western SoMa PEIR.

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<sup>38</sup> The Maher Map identifies sites that are known or suspected to contain contaminated soil and/or groundwater.

<sup>39</sup> AEI Consultants, *Phase I Environmental Site Assessment, 17 Grace Street, San Francisco, CA*. March 27, 2015. AEI Consultants, *Phase I Environmental Site Assessment, 15 & 23 Grace Street, San Francisco, CA*. March 27, 2015.

<sup>40</sup> Russell Yim, San Francisco Department of Public Health, Email to Justin Horner, 17 Grace Street, September 30, 2015.



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<b>16. MINERAL AND ENERGY RESOURCES— Would the project:</b>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Western SoMa PEIR determined that the community plan would facilitate the construction of both new residential and commercial buildings. Development of these uses would not result in use of large amounts of fuel, water, or energy in a wasteful manner or in the context of energy use throughout the City and region. The energy demand for individual buildings would be typical for such projects and would meet, or exceed, current state and local codes and standards concerning energy consumption, including Title 24 of the California Code of Regulations enforced by DBI. The Plan Area does not include any natural resources routinely extracted and the rezoning does not result in any natural resource extraction programs. Therefore, the Western SoMa PEIR concluded that implementation of the community plan would not result in a significant impact on mineral and energy resources. No mitigation measures were identified in the PEIR.

Because the proposed project is within the development projected under the Western SoMa Community Plan, there would be no additional project-level or cumulative impacts on mineral and energy resources beyond those analyzed in the Western SoMa PEIR.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
<b>17. AGRICULTURE AND FOREST RESOURCES:—Would the project:</b>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Western SoMa PEIR determined that no agricultural or forest resources exist in the Plan Area; therefore the Western SoMa Community Plan would have no effect on agricultural and forest resources. No mitigation measures were identified in the PEIR.

Because the proposed project is within the development projected under the Western SoMa Community Plan, there would be no additional project-level or cumulative impacts on agriculture and forest resources beyond those analyzed in the Western SoMa PEIR.

## MITIGATION MEASURES

### Project Mitigation Measure 1 – Procedures for Accidental Discovery of Archeological Resources (Mitigation Measure M-CP-4b of the Western SoMa PEIR)

This mitigation measure is required to avoid any potential adverse effect on accidentally discovered buried or submerged historical resources as defined in *CEQA Guidelines* section 15064.5(a)(c).

The project sponsor shall distribute the San Francisco Planning Department archeological resource "ALERT" sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, pile driving, etc. firms); and to utilities firms involved in soils-disturbing activities within the project site. Prior to any soils-disturbing activities being undertaken, each contractor is responsible for ensuring that the "ALERT" sheet is circulated to all field personnel, including machine operators, field crew, pile drivers, and supervisory personnel. The project sponsor shall provide the ERO with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firms) to the ERO confirming that all field personnel have received copies of the "ALERT" sheet.

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

If the ERO determines that an archeological resource may be present within the project site, the project sponsor shall retain the services of an archeological consultant from the pool of qualified archeological consultants maintained by the San Francisco Planning Department archeologist. The archeological consultant shall advise the ERO as to whether the discovery is an archeological resource, retains sufficient integrity, and is of potential scientific/historical/cultural significance. If an archeological resource is present, the archeological consultant shall identify and evaluate the archeological resource. The

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

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

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

Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning Division of the San Francisco Planning Department shall receive one bound copy, one unbound copy, and one unlocked, searchable PDF copy on a 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 from that presented above.

**Project Mitigation Measure 2 - General Construction Noise Control Measures (Mitigation Measure M-NO-2a of the Western SoMa PEIR)**

To ensure that project noise from construction activities is minimized to the maximum extent feasible, the sponsor of a subsequent development project shall undertake the following:

- The sponsor of a subsequent development project shall require the general contractor to ensure that equipment and trucks used for project construction use the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically attenuating shields or shrouds, wherever feasible).
- The sponsor of a subsequent development project shall require the general contractor to locate stationary noise sources (such as compressors) as far from adjacent or nearby sensitive receptors as possible, to muffle such noise sources, and to construct barriers around such sources and/or the construction site, which could reduce construction noise by as much as 5 dBA. To further reduce noise, the contractor shall locate stationary equipment in pit areas or excavated areas, if feasible.
- The sponsor of a subsequent development project shall require the general contractor to use impact tools (e.g., jack hammers, pavement breakers, and rock drills) that are hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust

muffler on the compressed air exhaust shall be used, along with external noise jackets on the tools, which could reduce noise levels by as much as 10 dBA.

- The sponsor of a subsequent development project shall include noise control requirements in specifications provided to construction contractors. Such requirements could include, but not be limited to: performing all work in a manner that minimizes noise to the extent feasible; undertaking the most noisy activities during times of least disturbance to surrounding residents and occupants, as feasible; and selecting haul routes that avoid residential buildings inasmuch as such routes are otherwise feasible.
- Prior to the issuance of each building permit, along with the submission of construction documents, the sponsor of a subsequent development project shall submit to the San Francisco Planning Department and Department of Building Inspection (DBI) a list of measures to respond to and track complaints pertaining to construction noise. These measures shall include: (1) a procedure and phone numbers for notifying DBI, the Department of Public Health, and the Police Department (during regular construction hours and off-hours); (2) a sign posted on-site describing noise complaint procedures and a complaint hotline number that shall be answered at all times during construction; (3) designation of an on-site construction complaint and enforcement manager for the project; and (4) notification of neighboring residents and non-residential building managers within 300 feet of the project construction area at least 30 days in advance of extreme noise-generating activities (defined as activities generating noise levels of 90 dBA or greater) about the estimated duration of the activity.

**Project Mitigation Measure 3 – Construction Emissions Minimization Plan for Health Risks and Hazards (Mitigation Measure M-AQ-7 of the Western SoMa PEIR)**

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

1. All off-road equipment greater than 25 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities shall meet the following requirements:
  - a) Where access to alternative sources of power are available, portable diesel engines shall be prohibited;
  - b) All off-road equipment shall have:
    - i. Engines that meet or exceed either United States Environmental Protection Agency 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).<sup>41</sup>
  - 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

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<sup>41</sup> Equipment with engines meeting Tier 4 Interim or Tier 4 Final emission standards automatically meet this requirement, therefore a VDECS would not be required.

limited or infeasible at the project site and that the requirements of this exception provision apply. Under this circumstance, the sponsor shall submit documentation of compliance with A(1)(b) for onsite power generation.

- ii. Exceptions to A(1)(b)(ii) *may* be granted if the project sponsor has submitted information providing evidence to the satisfaction of the ERO that a particular piece of off-road equipment with an ARB Level 3 VDECS is: (1) technically not feasible, (2) would not produce desired emissions reductions due to expected operating modes, (3) installing the control device would create a safety hazard or impaired visibility for the operator, or (4) there is a compelling emergency need to use off-road equipment that are not retrofitted with an ARB Level 3 VDECS and the sponsor has submitted documentation to the ERO that the requirements of this exception provision apply. If granted an exception to A(1)(b)(ii), the project sponsor must comply with the requirements of A(1)(c)(iii).
- iii. If an exception is granted pursuant to A(1)(c)(ii), the project sponsor shall provide the next cleanest piece of off-road equipment as provided by the step down schedules in Table A1 below.

**TABLE A1  
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 shall require the idling time for off-road and on-road equipment be limited to no more than two minutes, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment. Legible and visible signs

shall be posted in multiple languages (English, Spanish, Chinese) in designated queuing areas and at the construction site to remind operators of the two minute idling limit.

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

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