Mitigated Negative Declaration

PMND Date: June 14, 2017; amended on July 10, 2017 (amendments to the Initial Study/Preliminary Mitigated Negative Declaration are shown as deletions in strike through and additions in double underline)

Case No.: 2014-002849ENV
Project Title: 1196 Columbus Avenue
Zoning/Plan Area: C-2 (Community Business) District
Telegraph Hill-North Beach Residential Special Use District
40-X Height and Bulk District
Block/Lot: 0043/007
Lot Size: 6,379 square feet
Project Sponsor: 1196 Hotel, LLC
c/o Mark Loper – Reuben, Junius & Rose
(415) 567-9000, miloper@reubenlaw.com
Lead Agency: San Francisco Planning Department
Staff Contact: Christopher Espiritu
(415) 575-9022, Christopher.Espiritu@sfgov.org

PROJECT DESCRIPTION:

The project site, which is in San Francisco’s North Beach neighborhood, has frontages on the northeast side of Columbus Avenue, the east side of Jones Street, and the south side of Bay Street. The project site is occupied by a one-story, 22-foot-tall retail building that is occupied by a bicycle rental business. Prior to 2015, the building had been vacant since approximately 2006. There are no existing curb cuts or driveways on the project site.

The proposed project consists of the demolition of the existing building and the construction of a four-story, 40-foot-tall building containing 75 tourist hotel rooms and a 2,209-gross-square-foot bar and lounge. There would be a 12-foot-tall elevator penthouse and a nine-foot-tall stair penthouse on the roof of the building; the tallest point of the building would be approximately 52 feet above grade. No automobile parking spaces would be provided. A total of 12 bicycle parking spaces would be provided; six Class 1 spaces would be provided in a storage room in the basement, and six Class 2 spaces would be provided on the Jones Street sidewalk, adjacent to the project site.1 The proposed building would include a roof terrace for the hotel guests.

Construction of the proposed project would take about 18 months. The proposed project would be supported by a spread footing foundation; pile driving would not be required. Construction of the

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1 Section 155.1(a) of the Planning Code defines Class 1 bicycle spaces as “spaces in secure, weather-protected facilities intended for use as long-term, overnight, and work-day bicycle storage by dwelling unit residents, nonresidential occupants, and Employees” and defines Class 2 bicycle spaces as “spaces 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.”
Mitigated Negative Declaration
July 13, 2017

proposed project would require excavation to a depth of about 14 feet below ground surface and the removal of about 1,200 cubic yards of soil.

FINDING:

This project could not have a significant effect on the environment. This finding is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15064 (Determining Significant Effect), 15065 (Mandatory Findings of Significance), and 15070 (Decision to prepare a Negative Declaration), and the following reasons as documented in the Initial Evaluation (Initial Study) for the project, which is attached. Mitigation measures are included in this project to avoid potentially significant effects. See pages 97-104.

In the independent judgment of the Planning Department, there is no substantial evidence that the project could have a significant effect on the environment.

Lisa Gibson
Environmental Review Officer

7/12/17
Date of Issuance of Final Mitigated Negative Declaration

cc: 1196 Hotel, LLC – Project Sponsor
Mark Loper – Reuben, Junius & Rose
Carly Grob, Current Planning Division
Randall Dean, Archeologist
Supervisor Aaron Peskin, District 3
Master Decision File
Northeast Quadrant Bulletin Board
Distribution List
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A. PROJECT DESCRIPTION

Project Location

The 6,379-square-foot (0.15-acre) project site (Assessor’s Block 0043, Lot 007) is located at the southeast corner of Bay Street and Jones Street within San Francisco’s North Beach neighborhood. The project site is a corner lot located on a block bounded by Bay Street to the north, Columbus Avenue to the southwest, Taylor Street to the east, and Jones Street to the west (see Figure 1). The project site is located within the C-2 (Community Business) Zoning District and a 40-X Height and Bulk District. The site is also located within the Telegraph Hill-North Beach Residential Special Use District (SUD).

The project site is currently occupied by an approximately 5,750-square-foot, one-story, approximately 22-foot-tall building housing a bicycle rental business. Prior to 2015, the building was previously vacant since approximately 2006. Construction of the existing building was completed in 1995. Because the existing building on the project site is less than 45 years old, the building would not be eligible for listing in the California Register of Historical Resources (California Register) or otherwise identified as a historic resource for the purposes of the California Environmental Quality Act (CEQA). As such, the existing building is not considered a historic resource.

As shown on Figure 2 (Site Plan), the project site is a corner lot with approximately 69 feet of frontage along Bay Street, 60 feet of frontage along Jones Street, and 60 feet of frontage along Columbus Avenue. The existing building footprint on Lot 007 encompasses the entire lot and mirrors the existing street grid. There are no existing curb cuts located on the project site. Currently, there are existing street trees located along the Columbus Avenue frontages.

Project Characteristics

The proposed project consists of the demolition of the existing building and the construction of a four-story, 40-foot-tall building containing 75 tourist hotel rooms and a 2,209-gross-square-foot bar/lounge. Figures 3 through 5 (Floor Plans), shows the proposed ground floor configuration of the bar/lounge area and floor plans. The proposed building would include a roof terrace for the hotel guests (See Figure 5, Roof Plan). Also, as shown in Figures 6 through 9 (Elevations), there would be a 12-foot-tall elevator penthouse and a nine-foot-tall stair penthouse on the roof of the building; the tallest point of the building would be 52 feet above grade. A

As shown on Figure 10 (Basement Plan), no automobile parking spaces would be provided. A total of 12 bicycle parking spaces would be provided; six Class 1 spaces would be provided in a storage room in the basement, and six Class 2 spaces would be provided on the Jones Street sidewalk adjacent to the project site.
Project Construction

Construction of the proposed project would take about 18 months. The proposed project would be supported by a spread footings foundation; pile driving would not be required. Construction of the proposed project would require excavation to a depth of about 14 feet below ground surface and the removal of about 1,200 cubic yards of soil. Nighttime construction activities would not be anticipated.
Figure 1 – Project Location Map
Figure 2 – Site Plan

Source: Stanton Architecture, 2017
Figure 3 – Proposed Ground Floor Plan

Source: Stanton Architecture, 2017
Figure 4 – Typical Floor Plans (Floors 2-4)

Source: Stanton Architecture, 2017
Figure 5 – Proposed Roof Plan

Source: Stanton Architecture, 2017
Figure 6 – Proposed Elevations (Columbus Avenue)
Figure 7 – Proposed Elevations (Jones Street)
Figure 9 – Proposed Project (Bay and Jones Street View)

Source: Stanton Architecture, 2017
Source: Stanton Architecture, 2017

Figure 10 – Proposed Basement Plan
Project Approvals

Planning Commission

The project sponsor would be required to obtain a Conditional Use Authorization from the Planning Commission per Planning Code Sections 210.1 and 303, which would allow hotel uses within the C-2 (Community Business) zoning district.

Approval Action: Approval of the Conditional Use Authorization by the San Francisco Planning Commission is the Approval Action for the proposed project for the purposes of a CEQA appeal. The Approval Action date would establish the start of the 30-day appeal period for appeal of the Final Mitigated Negative Declaration to the Board of Supervisors pursuant to Section 31.04(h) of the San Francisco Administrative Code.

Department of Building Inspection

Approval of demolition and building permits would require review and approval by the Planning Department and Department of Building Inspection (DBI).

Department of Public Works

Construction of a new corner bulb-out along the Bay Street frontage would require a permit from San Francisco Public Works (SFPW)

If sidewalk(s) are used for construction staging and pedestrian walkways are constructed in the curb lane(s), the project would require a street space permit from the Bureau of Street Use and Mapping of SFPW.

San Francisco Municipal Transportation Agency

If sidewalk(s) are used for construction staging and pedestrian walkways are constructed in the curb lane(s), the project would require a special traffic permit from the San Francisco Municipal Transportation Agency (SFMTA) Sustainable Streets Division.

San Francisco Public Utilities Commission

Approval by the San Francisco Public Utilities Commission (SFPUC) would be required for any changes to sewer laterals (connections to the City sewer). The SFPUC must approve an erosion and sediment control plan prior to the start of construction, and must also approve compliance with post-construction stormwater design guidelines, including a stormwater control plan that complies with the City’s Stormwater Design Guidelines.
B.  PROJECT SETTING

The project site is on a block bounded by Bay Street to the north, Francisco Street to the south, Taylor Street to the east, Jones Street/Columbus Avenue to the west. The topography of the project site and the project vicinity is flat. Existing development on the project block consists of one- and two-story commercial buildings, four-story hotels, and two- to four-story residential buildings, some of which have ground-floor retail uses. The property adjacent to and east of the project site (500 Bay Street) is occupied by a four-story building containing residential uses above ground-floor retail uses. The property adjacent to and west of the project site (501 Bay Street) is occupied by a four-story residential building with a pre-school on the ground floor.

The project vicinity is characterized by residential, retail, hotel, and parking uses. The scale of development in the project vicinity ranges in height from 15 to 40 feet. There is a four-story hotel on the east side of Bay Street across from the project site, and there is a four-story residential building on the southwest side of Columbus Avenue from the project site. The NorthPoint Centre, a shopping center with a two-level parking garage, occupies the entire city block to the east of the project site and further east on Bay Street. Other land uses in the area include the San Francisco Municipal Railway’s (Muni’s) Kirkland Bus Yard (0.1 mile northeast of the project site), the Longshoremen’s Memorial Building (0.1 mile northwest), the North Beach Branch of the San Francisco Public Library (0.2 mile south), and Joe DiMaggio Playground and the North Beach Pool (0.2 mile south).

The project site is well served by public transit. Within one-quarter mile of the project site, Muni operates the 30 Stockton, and 47 Van Ness bus lines, and the Powell/Hyde and Powell/Mason cable cars.

The blocks to the north are zoned C-2, and the blocks to the west are zoned C-2, RH-1(D) (Residential, House, One-Family Detached), RH-2 (Residential, House, Two-Family), and RH-3 (Residential, House, Three-Family). The blocks to the east are zoned C-2 and RM-3. All of the blocks surrounding the project block are in a 40-X Height and Bulk District.

Cumulative Setting

Cumulative development in the project vicinity (generally within a 0.25-mile radius of the project site) includes the following projects that are either under construction or for which the Planning Department has an Environmental Evaluation Application on file:

- 400 Bay Street: The project would include the construction of a four-story, 13-room, approximately 15,000-square-foot hotel covering the entirety of the project site and reaching a height of approximately 40 feet. Support spaces, event areas, and other guest amenities would be located in the basement level, with a flexible 2,000-square-foot...
retail/event space on both the ground and basement levels (Planning Commission approval in August 2015).

- 2293-2299 Powell Street & 309-311 Bay Street: The project would demolish two vacant structures (most recently used for office and retail) and construct a new four-story, mixed-use building featuring 2,000 sq ft for ground-floor retail with three stories of residential use. The project would include a total of 17 dwelling units, including 12 one-bedroom and five two-bedroom units (Building permit and Variance Decision issued in December 2015).

For analysis of potential cumulative effects, each environmental topic herein briefly identifies the cumulative context relevant to that topic. For example, the context would be nearby projects that could contribute to cumulative shadow effects on open space. In other cases, such as air quality, the context would be citywide or regional growth projects.
C. COMPATIBILITY WITH EXISTING ZONING AND PLANS

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Discuss any variances, special authorizations, or changes proposed to the Planning Code or Zoning Map, if applicable.

Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.

Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection, or from Regional, State, or Federal Agencies.

San Francisco Planning Code and Zoning Maps

The San Francisco Planning Code (Planning Code), which incorporates by reference the City’s Zoning Maps, governs permitted uses, densities, and the configuration of buildings within San Francisco. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless the proposed project complies with the Planning Code, an exception or variance is granted pursuant to the provisions of the Planning Code, or legislative amendments to the Planning Code are included and adopted as part of the proposed project.

Land Use

The project site is within the C-2 (Community Business) zoning district. Pursuant to Planning Code Section 210.1, C-2 Districts provide convenience goods to residential areas of the City as well as comparison shopping goods and services to a citywide or regional market area. The composition of C-2 Districts varies from small clusters of stores to shopping centers along major thoroughfares. Pursuant to Planning Code Table 210.1, residential and restaurant uses are principally permitted in C-2 Districts.

The project site is in the Telegraph Hill-North Beach Residential SUD. The provisions of this SUD apply to properties that are zoned RH (Residential, House) or RM (Residential, Mixed). Since the project site is zoned C-2, the provisions of this SUD are not applicable.

Height and Bulk

The project site is in a 40-X Height and Bulk District, which permits a maximum building height of 40 feet. Bulk controls reduce the size of a building’s floorplates as the building increases in height. Pursuant to Planning Code Section 270(a), there are no bulk controls in an “X” Bulk District. At a height of 40 feet, the proposed project complies with the 40-foot height limit.

Floor Area Ratio

Floor area ratio (FAR) is the ratio of gross floor area of all the buildings on a lot to the area of the lot. Pursuant to Planning Code Section 124(c), the basic FAR shall be 4.8 to 1 for any property located within a C-2 (Community Business) Zoning District that is nearer to an RM-4 (Residential – Mixed) or RC-4 (Residential – Commercial) district than any other Residential District. A total
of 30,619 gsf can be developed on the 6,379-sq-ft project site. With a total of 28,278 gsf, the proposed project complies with the basic FAR of the project site.

Plans and Policies

San Francisco General Plan

The San Francisco General Plan (General Plan) establishes objectives and policies to guide land use decisions related to the physical development of San Francisco. It is comprised of ten elements, each of which addresses a particular topic that applies citywide: Air Quality; Arts; Commerce and Industry; Community Facilities; Community Safety; Environmental Protection; Housing; Recreation and Open Space; Transportation; and Urban Design. Any conflict between the proposed project and policies that relate to physical environmental issues are discussed in Section E, Evaluation of Environmental Effects. The compatibility of the proposed project with General Plan policies that do not relate to physical environmental issues will be considered by decision-makers as part of their decision whether to approve or disapprove the proposed project.

Proposition M – The Accountable Planning Initiative

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

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

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

The five principal regional planning agencies and their overarching policy-plans to guide planning in the nine-county bay area include the Association for Bay Area Governments’ Projections 2013, the Bay Area Air Quality Management District’s (BAAQMD’s) Bay Area 2010 Clean Air Plan (2010 Clean Air Plan), the Metropolitan Transportation Commission’s Regional Transportation Plan – Transportation 2035, the San Francisco Regional Water Quality Control Board’s San Francisco Basin Plan, and the San Francisco Bay Conservation and Development Commission’s San Francisco Bay Plan. Due to the size, location, and nature of the proposed project, no anticipated conflicts with regional plans would occur.

Required Approvals by Other Agencies

See Section A, Project Description, p. 14, for a list of required project approvals.

D. SUMMARY OF ENVIRONMENTAL EFFECTS

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

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

**CEQA SECTION 21099**

Aesthetics and Parking Analysis

CEQA Section 21099(d) provides that “aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment.” Accordingly, aesthetics and parking are not considered in determining if a project has the potential to result in significant environmental effects for projects that meet all of the following three criteria:

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

The proposed project meets each of the above three criteria and thus, this EIR does not consider aesthetics and the adequacy of parking in determining the significance of project impacts under CEQA.¹

The Planning Department recognizes that the public and decision makers nonetheless may be interested in information pertaining to the aesthetic effects of a proposed project and may desire that such information be provided as part of the environmental review process. Therefore, some information that would have otherwise been provided in an aesthetics section of the EIR (i.e., “before” and “after” visual simulations) has been included in Chapter 2, Project Description, of this EIR. However, this information is provided solely for informational purposes and is not used to determine the significance of the environmental impacts of the project, pursuant to CEQA.

In addition, CEQA section 21099(d)(2) states that a Lead Agency maintains the authority to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers and that aesthetics impacts do not include impacts on historical or cultural resources

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¹ San Francisco Planning Department, *Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis*, 1196 Columbus Avenue, Case Number 2014-002849ENV, March 2017. This document is available for public review at the Planning Department, 1650 Mission Street, Suite 400.
(e.g., historic architectural resources). As such, the Planning Department does consider aesthetics for design review and to evaluate effects on historic and cultural resources.

Automobile Delay and Vehicle Miles Traveled Analysis

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\(^2\) recommending that transportation impacts for projects be measured using a vehicle miles traveled (VMT) metric. On March 3, 2016, based on compelling evidence in that document and on the City’s independent review of the literature on LOS and VMT, the San Francisco Planning Commission adopted OPR’s recommendation to use the VMT metric instead of automobile delay to evaluate the transportation impacts of projects (Resolution 19579). (Note: the VMT metric does not apply to the analysis of impacts on non-automobile modes of travel such as riding transit, walking and bicycling.)

Accordingly, this Initial Study does not contain a discussion of automobile delay impacts. Instead, a VMT and induced automobile travel impact analysis is provided in Section 4, Transportation and Circulation. The topic of automobile delay, nonetheless, may be considered by decision-makers, independent of the environmental review process, as part of their decision to approve, modify, or disapprove the proposed project.

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\(^2\) This document is available online at: [https://www.opr.ca.gov/s_sb743.php](https://www.opr.ca.gov/s_sb743.php).
E. EVALUATION OF ENVIRONMENTAL EFFECTS

| Topics: LAND USE AND LAND USE PLANNING—Would the project: |
|---------------------------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| a) Physically divide an established community? | ☐ | ☐ | ☒ | ☐ | ☐ |
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | ☐ | ☐ | ☒ | ☐ | ☐ |

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

As discussed in the Section A, Project Description (page 1), the approximately 6,379-square-foot project site is located on a corner lot at the southeast corner of Bay Street and Jones Street in San Francisco’s North Beach neighborhood (see Figure 1). The project site is currently occupied by an existing one-story, 22-foot-tall, commercial building. The proposed project would include the demolition of the existing building on-site and the construction of a new four-story structure consisting of 2,209 square feet for a ground floor bar and lounge and 75 hotel rooms above. The proposed mixed-use structure would be approximately 40 feet above grade to the roofline, with an additional approximately 12 feet in height for the proposed rooftop features such as a mechanical penthouse (exempt from the height limits for this zoning district).

Given that the existing building only contains a single-story commercial space with no dwelling units, the proposed project would intensify the use of the project site, but would not alter the general land use pattern of the immediate area, which already includes nearby buildings with commercial uses on the ground floor with hotel uses above. The proposed building would not physically divide the established community, because the project would be built within the existing street configuration and would not include any impediments to pedestrian or other travel through the neighborhood. The surrounding uses and activities would remain and they would interrelate with each other as they do currently. They would not be affected substantially by the proposed project.

Implementation of the proposed project would not alter the established street grid or permanently close any streets or sidewalks. Although portions of the sidewalk adjacent to the project site could be closed for periods of time during project construction, these closures would be temporary in nature. For these reasons, the proposed project would not physically divide an
established community. This impact would be less than significant, and no mitigation measures are necessary.

**Impact LU-2:** The proposed project would not 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. *(Less than Significant)*

Land use impacts are considered to be significant if the proposed project would conflict with any plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Environmental plans and policies are those, like the Bay Area Air Quality Management District *Bay Area 2010 Clean Air Plan*, which directly address environmental issues and/or contain targets or standards, which must be met in order to preserve or improve characteristics of the City’s physical environment. As discussed in Section C, Compatibility with Existing Zoning and Plans, the proposed project would not obviously or substantially conflict with any such adopted environmental plan or policy. Furthermore, the proposed project would not conflict with the San Francisco General Plan policies that relate to physical environmental issues. Therefore, the proposed project would have a less-than-significant impact with regard to consistency with existing plans, polices, and regulations, and no mitigations are necessary.

**Impact C-LU-1:** The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative land use impact. *(Less than Significant)*

As of April 2017, cumulative development in the project vicinity (within a quarter-mile radius of the project site) includes the following projects that are either under construction or for which the Planning Department has an Environmental Evaluation Application on file:

- 400 Bay Street (a 13-room tourist hotel with 2,000 gsf of retail/event space)
- 2293-2299 Powell Street/309-311 Bay Street (a 17-unit residential building with 2,000 gsf of retail space)

There are no other known future/pipeline development projects within one-quarter mile of the project site. These nearby cumulative development projects would not physically divide an established community by constructing a physical barrier to neighborhood access or removing a means of access. None of the nearby cumulative development projects would obviously or substantially conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The nearby cumulative development projects would introduce new retail and hotel uses to the project vicinity. All of these uses currently exist in the project vicinity. The proposed project, as well as nearby cumulative development projects, would not introduce any incompatible uses, such as industrial uses. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects to create a significant cumulative land use impact.
## POPULATION AND HOUSING

Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

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b) Displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?

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c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

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### Impact PH-1: The proposed project would not directly or indirectly induce substantial population growth in an area. (Less than Significant)

In general, a project would be considered growth inducing if its implementation were to result in a substantial population increase or new development that might not occur without the project. The proposed project would replace an existing one-story commercial building with a new hotel containing 75 rooms and 2,209 gsf of ground-floor bar/lounge space. The proposed project would directly increase employment at the project site and contribute to anticipated population growth in both the neighborhood and citywide context.

The 2010 U.S. Census reported a population of 805,235 persons in the City and County of San Francisco and a population of 3,739 persons in Census Tract 101, which includes the project site and its immediate vicinity. The 2010 population of census tracts within a quarter-mile radius of the project site is approximately 15,225 persons. The proposed project would not include any new dwelling units on-site, thus the project would not increase the population at the project site. Further, implementation of the proposed project would not directly induce substantial population growth in the project vicinity that would cause a substantial adverse physical change to the environment. The proposed project would not indirectly induce substantial population growth in the project vicinity, because it would not involve any changes to roads, utilities, or other infrastructure.

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4 Census Tract 101 is generally bounded by Leavenworth Street and Columbus Avenue on the west, Chestnut Street on the south, and The Embarcadero on the east and the north.

The proposed project would introduce commercial activity and about 74 employees to the project site. San Francisco’s overall employment is projected to increase by approximately 190,780, from about 568,720 employees in 2010 to approximately 759,500 in 2040. Even if all of the 74 employees associated with the proposed project were conservatively assumed to be new to San Francisco, the project-related employment growth would represent considerably less than 1 percent (0.01 percent) of the City’s estimated employment growth between the years 2010 and 2040. This estimated increase in employment would be negligible in the context of total employment in San Francisco. For these reasons, implementation of the proposed project would not induce substantial growth or concentration of employment that would cause a substantial adverse physical change to the environment.

In summary, project-related population increases would be less than significant in relation to the existing number of residents and employees in the project vicinity and to the expected increases in the residential and employment populations of San Francisco. The proposed project would not directly or indirectly induce substantial population growth or concentration of employment in the project vicinity or citywide such that an adverse physical change to the environment would occur. This impact would be less than significant, and no mitigation measures are necessary.

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

The proposed project would not displace any residents or housing units, since no residential uses or housing units currently exist on the project site. As noted above, the proposed project would construct a new 75-room hotel and a 2,209 sq ft bar and lounge on the ground floor, and would not include new housing units. An estimated 74 new jobs (68 hotel employees and 6 bar/lounge employees) would be created with the establishment the proposed project. The hotel and bar/lounge employment in the proposed project would not likely offer sufficiently high wages such that it would be anticipated to attract new employees to San Francisco. Therefore, it can be anticipated that most of the employees would live in San Francisco (or nearby communities), and that the project would thus not generate demand for new housing for the potential retail employees.

Further, the demolition of the existing one-story commercial building and the subsequent removal of the existing employment would not be considered a displacement of a substantial number of employees. Also, the project would not create a substantial demand for new housing elsewhere, because the project would not create a substantial number of new jobs related to the proposed uses on the project site. Therefore, the proposed project would have a less-than-

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6 San Francisco Planning Department, *Transportation Impact Analysis Guidelines for Environmental Review*, October 2002, Appendix C, Table C-1. Based on 75 hotel rooms, there would be 68 employees. Based on 2,209 gsf of bar/lounge space, there would be 6 employees.

7 ABAG, *Projections 2013*, p. 75.
significant impact related to the displacement of housing, displacement of employees, or the creation of a demand for additional housing elsewhere, and no mitigation measures are necessary.

**Impact C-PH-1:** The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact related to population and housing. *(Less than Significant)*

Cumulative development in the project vicinity would result in an intensification of land uses and cumulative increases in the residential and employment populations at the neighborhood, citywide, and regional levels. This cumulative growth is consistent with projections presented in *Plan Bay Area* and *Projections 2013*. As discussed under Impacts PH-1 and PH-2, the proposed project’s contribution to this cumulative growth would not be substantial. The proposed project would not combine with past, present, and reasonably foreseeable future projects to create a significant cumulative impact related to population and housing.

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3. **CULTURAL RESOURCES—Would the project:**

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code?

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

c) Disturb any human remains, including those interred outside of formal cemeteries?

d) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code §21074?

**Impact CR-1:** The proposed project would not cause a substantial adverse change in the significance of a historical resource. *(No Impact)*

Historical resources are those properties that meet the definitions in Section 21084.1 of the CEQA statute and Section 15064.5 of the CEQA Guidelines. Historical resources include properties listed in, or formally determined eligible for listing in, the California Register of Historical Resources (California Register) or in an adopted local historic register. Historical resources also include resources identified as significant in a historical resource survey meeting certain criteria.
Additionally, properties that are not listed but are otherwise determined to be historically significant, based on substantial evidence, would also be considered historical resources. The significance of a historical resource is materially impaired when a project “demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance.”

Implementation of the proposed project includes the demolition of the existing commercial building on-site. In evaluating whether the proposed project would cause a substantial adverse change in the significance of a historical resource, the Planning Department must first determine whether the existing buildings on the project site are historical resources. A property may be considered a historical resource if it meets any of the California Register criteria related to (1) events, (2) persons, (3) architecture, or (4) information potential, that make it eligible for listing in the California Register, or if it is considered a contributor to a potential historic district.

The building at 1196 Columbus Avenue was constructed in 1995 and the project site is not located in an eligible or identified historic district. The existing building on the project site is less than 45 years of age.

In conclusion, the existing building at 1196 Columbus Avenue is not eligible for listing on the California Register as individual resources or as a contributor to a historic district and thus is not considered historical resources under CEQA. For these reasons, the proposed project would not cause a substantial adverse change in the significance of a historical resource. This impact would be less than significant, and no mitigation measures are necessary.

**Impact CR-2: The proposed project would potentially cause a substantial adverse change in the significance of an archeological resource and potentially disturb human remains, including those interred outside of formal cemeteries. (Less than Significant with Mitigation)**

Determining the potential for encountering archeological resources includes relevant factors such as the location, depth, and amount of excavation proposed as well as any recorded information on known resources in the area. Construction of the proposed project would require excavation to a depth of 14 feet below ground surface and the removal of approximately 1,200 cubic yards of soil. Due to the depth of the proposed excavation, the Planning Department conducted a Preliminary Archeological Review and determined that the project site may have sensitivity for historic and deeply buried prehistoric archeological deposits. Also, the project would require deep foundations or some type of soils improvement technique which may have the potential to adversely affect such deposits. The proposed project, therefore, has the potential to cause a substantial adverse change to subsurface archaeological resources by adversely affecting the significance of these resources under Criterion 4 (Information Potential). The partial or total destruction of archaeological resources by the project would impair the ability of such resources to convey important scientific and historical information. Implementation of **Mitigation Measure**
**M-CR-2 Archeological Testing** below would reduce the potential impact to a less-than-significant level.

**Mitigation Measure M-CR-2: Archeological Testing**

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

**Consultation with Descendant Communities:** On discovery of an archeological site\(^8\) associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group an appropriate representative\(^9\) of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to offer recommendations to the ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Final Archaeological Resources Report shall be provided to the representative of the descendant group.

**Archeological Testing Program.** The archeological consultant shall prepare and submit to the ERO for review and approval an archeological testing plan (ATP). The archeological testing program shall be conducted in accordance with the approved ATP. The ATP shall

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

9 An “appropriate representative” of the descendant group is here defined to mean, in the case of Native Americans, any individual listed in the current Native American Contact List for the City and County of San Francisco maintained by the California Native American Heritage Commission and in the case of the Overseas Chinese, the Chinese Historical Society of America. An appropriate representative of other descendant groups should be determined in consultation with the Department archeologist.
identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, the testing method to be used, and the locations recommended for testing. The purpose of the archeological testing program will be to determine to the extent possible the presence or absence of archeological resources and to identify and to evaluate whether any archeological resource encountered on the site constitutes an historical resource under CEQA.

At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the ERO. If based on the archeological testing program the archeological consultant finds that significant archeological resources may be present, the ERO in consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or an archeological data recovery program. No archeological data recovery shall be undertaken without the prior approval of the ERO or the Planning Department archeologist. If the ERO determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

A) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or
B) A data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

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

- The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils-disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the risk these activities pose to potential archaeological resources and to their depositional context;
- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;
- The archeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;
- The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be
empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO.

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

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

The scope of the ADRP shall include the following elements:

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

**Human Remains and Associated or Unassociated Funerary Objects.** The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner’s determination that the human remains are Native American
remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archeological consultant, project sponsor, ERO, and MLD shall have up to but not beyond six days of discovery to make all reasonable efforts to develop an agreement for the treatment of human remains and associated or unassociated funerary objects with appropriate dignity (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. Nothing in existing State regulations or in this mitigation measure compels the project sponsor and the ERO to accept recommendations of an MLD. The archeological consultant shall retain possession of any Native American human remains and associated or unassociated burial objects until completion of any scientific analyses of the human remains or objects as specified in the treatment agreement if such as agreement has been made or, otherwise, as determined by the archeological consultant and the ERO.

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

Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound, one unbound and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

Impact CR-3: The proposed project would not cause a substantial adverse change in the significance of a tribal cultural resource. (Less than Significant with Mitigation)

Tribal cultural resources are those resources that meet the definitions in Public Resources Code Section 21074. Tribal cultural resources are defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are also either (a) included or determined to be eligible for inclusion in the California Register of Historical Resources or (b) included in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). Based on discussions with Native American tribal representatives, in San Francisco, prehistoric archeological resources are presumed to be potential
tribal cultural resources. A tribal cultural resource is adversely affected when a project impacts its significance.

Pursuant to Assembly Bill 52, effective July 1, 2015, within 14 days of a determination that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency is required to contact the Native American tribes that are culturally or traditionally affiliated with the geographic area in which the project is located. Notified tribes have 30 days to request consultation with the lead agency to discuss potential impacts on tribal cultural resources and measures for addressing those impacts.

In June 2017, the Planning Department mailed a “Tribal Notification Regarding Tribal Cultural Resources and CEQA” to the appropriate Native American tribal representatives who have requested notification. No Native American tribal representatives contacted the Planning Department to request consultation.

As discussed under Impact CR-2, Mitigation Measure M-CR-2, Archeological Testing, would be applicable to the proposed project as it would result in below-grade soil disturbance of 14 feet or greater below ground surface. Unknown archeological resources may be encountered during construction that could be identified as TCRs at the time of discovery or at a later date. Therefore, the potential adverse effects of the proposed project on previously unidentified archeological resources, discussed under Impact CR-2, also represent a potentially significant impact on TCRs. Implementation of Mitigation Measure M-CR-3, Tribal Cultural Resources Interpretive Program, would reduce potential adverse effects on TCRs to a less-than-significant level. Mitigation Measure M-CR-3 would require either preservation-in-place of the TCRs, if determined effective and feasible, or an interpretive program regarding the TCRs developed in consultation with affiliated Native American tribal representatives.

Mitigation Measure M-CR-3: Tribal Cultural Resources Interpretive Program

If the ERO determines that a significant archeological resource is present, and if in consultation with the affiliated Native American tribal representatives, the ERO determines that the resource constitutes a tribal cultural resource (TCR) and that the resource could be adversely affected by the proposed project, the proposed project shall be redesigned so as to avoid any adverse effect on the significant tribal cultural resource, if feasible. If the Environmental Review Officer (ERO), if in consultation with the affiliated Native American tribal representatives and the Project Sponsor, determines that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option, the Project Sponsor shall implement an interpretive program of the TCR in consultation with affiliated tribal representatives. An interpretive plan produced in consultation with the ERO and affiliated tribal representatives, at a minimum, and approved by the ERO would be required to guide the interpretive program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and
materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, artifacts displays and interpretation, and educational panels or other informational displays.

Below-grade construction on the proposed project site could potentially encounter and result in a change in the significance of TCRs. However, implementation of Mitigation Measure M-CR-3, Tribal Cultural Resources Interpretive Program, would reduce potential adverse effects on TCRs to a less-than-significant level.

**Impact C-CR-1:** The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in cumulative impacts on cultural resources. *(Less than Significant)*

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

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<td>4. TRANSPORTATION AND CIRCULATION—Would the project:</td>
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<td>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?</td>
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<td>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?</td>
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<td>c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?</td>
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<td>d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?</td>
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The project is not located within an airport land use plan area or in the vicinity of a private airstrip. Therefore, Topic 4(c) is not applicable to the project. A transportation study was prepared for the proposed project. The following discussion is based on the information provided in the transportation memorandum.\textsuperscript{10}

\textbf{Setting}

The project site is located within San Francisco’s North Beach neighborhood on a block bounded by Bay Street to the north, Francisco Street to the south, Taylor Street to the east, and Jones Street/Columbus Avenue to the west. The project site is a corner lot with frontages along Bay Street, Jones Street, and Columbus Avenue. Access to the project site by transit, foot, or bicycle is available through existing bus transit service, sidewalks, streets, and crosswalks near the site.

As part of the transportation study, p.m. peak hour conditions were evaluated for three intersections along roadways adjacent to or nearby the project site, including the north-south roadways: Columbus Avenue and Jones Street; and east-west roadway: Bay Street. The three roadways with frontages on the project site—Columbus Avenue, Jones Street, and Bay Street—are highlighted here.\textsuperscript{11}

Columbus Avenue is a north-south roadway that runs between Beach and Washington Streets. In the vicinity of the project site, Columbus Avenue has two lanes in each direction and on-street parking on both sides of the street. Bay Street is an east-west roadway that runs between Laguna Street and the Embarcadero. In the vicinity of the project site, Bay Street has two travel lanes in each direction and on-street parking on both sides of the street. Jones Street is a north-south roadway that runs between Jefferson Street and Market Street. In the vicinity of the project site, Jones Street has one travel lane in each direction and on-street parking on both sides of the street.

Sidewalks of varying widths are provided on both sides of all three streets fronting the project site. The sidewalks along Columbus Avenue are approximately 12 feet wide. The sidewalks along Bay Street are 9-12 feet wide. There are no existing on-street loading spaces on any of the project frontages of Bay Street or Columbus Avenue. There are existing bicycle facilities within the project vicinity with the closest bicycle routes located on Columbus Avenue (Class III) and on

\textsuperscript{10} CHS Consulting, 1196 Columbus Avenue Hotel Project Transportation Memo, San Francisco, CA, January 2017

North Point Street (Class II). Class II bicycle facilities provide a designated striped lane for one-way travel; Class III bicycle facilities are designated shared-use lanes, where bicyclists travel in the same lane as motor vehicle traffic.

The transit study area generally covers a two-block radius from the project site, bounded by Beach Street to the north, Hyde Street to the west, Chestnut Street to the south and Mason Street to the east. The project site is served by local public transit service provided by the San Francisco Municipal Railway (Muni). There are two Muni bus routes and two Muni cable car lines that operate within the study area. These lines operate along Columbus Avenue, Taylor Street, North Point Street and Hyde Street.

There is an existing bus stop adjacent to the project site located just south of the project frontage on Columbus Avenue at Francisco Street. The project site can be accessed by a number of Muni bus routes, including the 30 Stockton bus line along Bay Street and the 47 Van Ness bus line along North Point Street. Additionally, two Muni cable car lines operate two blocks to the west on Hyde Street (Powell-Hyde) and one block to the east on Taylor Street (Powell-Mason). In addition to Muni operations, the following regional transit services operate within San Francisco and are accessible from the project site via Muni or other modes of travel: Bay Area Rapid Transit (BART), Golden Gate Transit, Alameda-Contra Costa County Transit District (AC Transit), Caltrain, and San Mateo County Transit District (SamTrans). The BART station most easily accessible to the project site is the Powell Street Station, located approximately less than two miles from the project site.

There is no existing parking on the project site and there are no existing curb cuts or driveways. Pedestrian access to the existing one-story commercial building is from a storefront on Jones Street. There are no existing passenger loading zones adjacent to any of the project frontages, however there are passenger loading zones in the vicinity of the project on Columbus Avenue, Bay Street, and Jones Street.

**Approach to Analysis**

Policy 10.4 of the Transportation Element of the General Plan directs City decision-makers to “consider the transportation system performance measurements in all decisions for projects that affect the transportation system.” In order to determine whether the proposed project would conflict with a transportation- or circulation-related plan, ordinance, or policy, this section discusses the potential impacts that the proposed project could have on traffic, transit, pedestrian, bicycle, and emergency vehicle circulation as well as potential impacts associated with loading activities and construction activities. As noted on pp. 20-21, parking is not considered a potential environmental impact, but parking is discussed for informational purposes.

**Vehicle Miles Traveled in San Francisco and the Bay Area**
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.\textsuperscript{12,13}

For the purposes of VMT analysis, residential VMT is used as a proxy for other similar developments (such as tourist hotels). The regional average daily VMT per capita is 16.8 for hotel uses. For the proposed retail development, regional average daily work-related VMT per employee is 12.6. Refer to Table 1: Daily Vehicle Miles Traveled, which includes the

\textsuperscript{12} A tour-based assessment of VMT at a retail site would consider the VMT for all trips in the tour, for any tour with a stop at the retail site. If a single tour stops at two retail locations, for example, a coffee shop on the way to work and a restaurant on the way back home, then both retail locations would be allotted the total tour VMT. A trip-based approach allows us to apportion all retail-related VMT to retail sites without double-counting

\textsuperscript{13} San Francisco Planning Department, Executive Summary: Resolution Modifying Transportation Impact Analysis, Appendix F, Attachment A, March 3, 2016
transportation analysis zone (TAZ) in which the project site is located, 833.

Table 1 – Daily Vehicle Miles Traveled – Existing Conditions

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Bay Area</th>
<th>TAZ 833</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Regional Average</td>
<td>Regional Average Minus 15%</td>
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<tr>
<td>Employment (Retail)</td>
<td>14.9</td>
<td>12.6</td>
</tr>
<tr>
<td>Tourist Hotel</td>
<td>16.8</td>
<td>14.6</td>
</tr>
</tbody>
</table>

Source: San Francisco Transportation Information Map (SF TIM), accessed online May 2017.

Trip Generation

The proposed project consists of the demolition of an existing commercial building and the construction of a new four-story building containing 75 hotel rooms, approximately 2,209 sq ft for a ground floor bar/lounge, and seven bicycle parking spaces.

Trip generation for the proposed project was calculated using information in the 2002 Transportation Impact Analysis Guidelines for Environmental Review (Transportation Guidelines) developed by the San Francisco Planning Department. The proposed project would generate an estimated 1,733 person trips (inbound and outbound) on a weekday daily basis, consisting of 624 person trips by auto, 308 transit trips, 596 walk trips, and 206 trips by other modes. During the p.m. peak hour, the proposed project would generate an estimated 78 person trips by auto. Accounting for vehicle occupancy data for the project site’s census tract, the proposed project would generate 267 daily vehicle trips, 36 of which would occur during the p.m. peak hour.

Impact TR-1: The proposed project would not cause substantial additional VMT or substantially induce automobile travel. (Less than Significant)

Vehicle Miles Traveled Analysis – Tourist Hotel

As discussed above, existing average daily VMT per capita for hotel uses in TAZ 833 is 4.1 miles. This is 75.6 percent below the existing regional average daily VMT per capita of 16.8. Given the project site is located in an area where existing VMT is more than 15 percent below the existing regional average, the proposed project’s hotel use would not result in substantial additional VMT and impacts would be less than significant. Also, the project site meets the Proximity to Transit Stations screening criterion, which indicates that the proposed project’s hotel uses would not cause substantial additional VMT.

Vehicle Miles Traveled Analysis – Retail

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14 San Francisco Planning Department, Transportation Calculations, 1196 Columbus Avenue, April 2017.
As mentioned previously, existing average daily VMT per employee for retail uses in TAZ 833 is 6.2 miles. This is 58 percent below the existing regional average daily VMT per capita of 14.9. Given the project site is located in an area where existing VMT is more than 15 percent below the existing regional average, the proposed project’s bar/lounge use would meet the Map-Based Screening for Retail and Residential Projects criterion and would not result in substantial additional VMT; impacts would be less than significant. The project site also meets the Proximity to Transit Stations screening criterion, which indicates that the proposed project’s retail uses would not cause substantial additional VMT.

The proposed project would generate 36 p.m. peak-hour vehicle trips that would travel through surrounding intersections. These 36 p.m. peak-hour vehicle trips represent a small portion of the overall number of p.m. peak-hour vehicle trips that pass through surrounding intersections. For example, about 610 vehicles pass through the intersection of Columbus Avenue and Jones Street in the northbound direction during the p.m. peak hour.\textsuperscript{15} The proposed project’s daily and p.m. peak-hour vehicle trips would not substantially increase traffic volumes at nearby intersections such that new traffic hazards would be created.

For these reasons, the proposed project would result in less-than-significant traffic impacts, and no mitigation measures are necessary.

Impact TR-2: The proposed project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system and would not conflict with an applicable congestion management. (Less than Significant)

Construction Traffic

Construction of the proposed project would take approximately 18 months. Construction staging would occur primarily on the project site and is not expected to close any travel lanes on Columbus Avenue, Jones Street, or Bay Street; any necessary closures would be temporary in duration. During the construction period, there would be a flow of construction-related trucks to and from the project site. Due to the slower movement and larger turning radii of trucks, there would be a temporary reduction in the capacities of local streets. Construction activities would generate construction worker trips to and from the project site and a temporary demand for parking and public transit. Construction workers would likely park their vehicles in nearby off-street parking facilities. The temporary demand for public transit would not exceed the capacity of local or regional transit service. Due to the temporary nature of the construction activities, the construction-related impacts on transportation and circulation would be less than significant and no mitigation measures are necessary.

Loading

Pursuant to Planning Code Section 152, the proposed project is not required to provide any off-street loading spaces. As discussed above, there is an existing on-street loading space on Bay Street directly across from the project site. During a midday field observation, this loading space was unoccupied and available for use.\footnote{Field observation on August 21, 2015.}

Loading demand for the proposed project was calculated using the methodology set forth in the Transportation Guidelines. The proposed project would generate six loading trips per day, which equates to an average peak-hour loading demand of less than one space. The peak loading demand for the proposed project could be met by the existing on-street loading spaces. The project sponsor would seek an approval for a new on-street freight loading zone pending review by SFMTA.

Given the peak-hour loading demand of less than one space for the proposed project and the availability of existing on-street loading spaces near the project site, the proposed project would not have significant loading impacts.

**Parking**

The parking demand for the new hotel and commercial uses associated with the proposed project was determined based on the methodology presented in the Transportation Guidelines. On an average weekday, the demand for parking would be 31 spaces. The proposed project would not provide any vehicle parking spaces, which would result in an unmet parking demand of 31 spaces. At this location, the unmet parking demand could be accommodated by existing on-street and off-street parking spaces within a reasonable distance from the project vicinity. Additionally, the project site is well served by public transit and bicycle facilities. Therefore, any unmet parking demand associated with the proposed project would not materially affect the overall parking conditions in the project vicinity in such a way that hazardous conditions or significant delays would be created.

Parking conditions are not static, as parking supply and demand varies from day to day, from day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition but changes over time as people change their modes and patterns of travel. Although parking conditions change over time, a substantial shortfall in parking caused by a project that creates hazardous conditions or significant delays to traffic, transit, bicycles, or pedestrians could adversely affect the physical environment. Whether a shortfall in parking creates such conditions depends on the magnitude of the shortfall and the ability of drivers to change travel patterns or switch to other travel modes. If a substantial shortfall in parking caused by a project creates hazardous conditions or significant delays in travel, such a condition could also result in secondary physical environmental impacts (e.g., air quality or noise impacts caused by congestion), depending on the project and its setting.
The absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles, or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service or other modes (walking and biking), would be in keeping with the City’s “Transit First” policy and numerous San Francisco General Plan policies, including those in the Transportation Element. The City’s Transit First policy, established in the City’s Charter, Section 8A.115, provides that “parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation.”

The transportation analysis accounts for potential secondary effects, such as drivers circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking is unavailable. The secondary effects of drivers searching for parking is typically offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area, and thus choose to reach their destination by other modes (i.e., walking, biking, transit, taxi). If this occurs, any secondary environmental impacts that may result from a shortfall in parking in the vicinity of the project site would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise and pedestrian safety analyses, would reasonably address potential secondary effects.

Impact TR-3: The proposed project would not substantially increase hazards due to a design feature or incompatible uses. *(Less than Significant)*

The proposed project would not include any design features that would substantially increase traffic hazards (e.g., a new sharp curve or dangerous intersections), and would not include any incompatible uses, as discussed in Topic E1, Land Use and Land Use Planning. Therefore, the proposed project would not cause adverse impacts associated with traffic hazards. The proposed project would not include on-site vehicle parking and would not add new driveways or curb cuts along the project frontages. Based on the above, the proposed project would have a less-than-significant impact related to transportation hazards due to a design feature or resulting from incompatible uses.

Impact TR-4: The proposed project would not result in inadequate emergency access. *(Less than Significant)*

Implementation of the proposed project would not result in the permanent closure of any existing streets in the project vicinity, so emergency vehicle access would remain unchanged from existing conditions. Emergency vehicles would continue to access the project site from either Columbus Avenue, Bay Street, or Jones Street. This impact would be less than significant, and no mitigation measures are necessary.
Impact TR-5: The proposed project would not conflict with adopted policies, plans or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such features. *(Less than Significant)*

**Transit**

The project site is well served by local and regional public transit. Within one-quarter mile of the project site, Muni operates the 30 Stockton bus line along Bay Street and the 47 Van Ness bus line along North Point Street. Additionally, two Muni cable car lines operate two blocks to the west on Hyde Street (Powell-Hyde) and one block to the east on Taylor Street (Powell-Mason). The proposed project would generate 308 daily transit trips, including 46 during the p.m. peak hour. These transit trips would be distributed among the multiple transit lines serving the project vicinity. Given the availability of nearby transit, the addition of 46 p.m. peak-hour transit trips would be accommodated by existing capacity. For these reasons, 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.

**Bicycle Conditions**

It is anticipated that some of the daily person trips to and from the project site would be made by bicycle. The proposed project would provide 12 bicycle parking spaces (six Class I and six Class II bicycle parking spaces) within a basement level and bicycle racks along the Jones Street frontage of the site. The proposed project would generate 206 daily and 23 p.m. peak-hour trips made by other modes including bicycles, as well as 267 daily vehicle trips. These vehicle trips would be distributed among all of the streets in the project vicinity and would not be concentrated along North Point Street, where an existing Class II bicycle lane is located. For these reasons, the proposed project would not conflict with adopted policies, plans or programs regarding bicycle facilities or decrease the performance or safety of such features. This impact would be less than significant, and no mitigation measures are necessary.

The *San Francisco Bicycle Plan* includes goals and objectives to encourage bicycle use in the City, describes the existing bicycle route network (a series of interconnected streets and pathways on which bicycling is encouraged) and identifies improvements to achieve the established goals and objectives. Implementation of the proposed project would not alter the existing street grid or result in other physical changes that would affect the existing Class II bicycle lane along North Point Street.

The proposed project would provide adequate bicycle access and bicycle parking (as shown on Figure 2 and 10 (Site Plan and Basement Plan), and would not result in hazardous conditions for bicyclists, and therefore would have a less-than-significant impact related to conflicting with the City’s *Bicycle Plan*, or other plan, policy or program related to bicycle use in San Francisco.
Pedestrians

The proposed project would generate 596 daily pedestrian trips to and from the project site, including 68 pedestrian trips during the p.m. peak hour. As discussed above, the sidewalks along the project frontages on Columbus Avenue, Jones Street, and Bay Street are approximately 10 feet wide, 15 feet wide, and 8 feet wide, respectively. Implementation of the proposed project would not result in the narrowing of sidewalks, the expansion of roadways, or other alterations to the existing street grid. The proposed project would include the construction of a new sidewalk extension (bulb-out) at the southeast corner of Jones Street and Bay Street. The existing sidewalks in the project vicinity would be able to accommodate the additional pedestrian trips generated by the proposed project without becoming substantially overcrowded or substantially affecting pedestrian flows. This impact would be less than significant, and no mitigation measures are necessary.

Impact C-TR-1: The proposed project, in combination of past, present, and reasonably foreseeable future projects, would not result in a considerable contribution to cumulative regional VMT. (Less than Significant)

VMT, by its very nature, is largely a cumulative impact. The VMT associated with past, present, and future projects contribute to physical secondary environmental impacts. It is likely that no single project by itself would be sufficient in size to prevent the region or state from meeting its VMT reduction goals. Instead, a project’s individual VMT contributes to cumulative VMT impacts. The VMT and induced automobile travel project-level thresholds are based on levels at which new projects are not anticipated to conflict with state and regional long-term greenhouse gas emission reduction targets and statewide VMT per capita reduction targets set for 2020. Therefore, because the proposed project would not exceed the project-level thresholds for VMT and induced automobile travel (Impact TR-1), the proposed project would not result in a cumulatively considerable contribution to VMT impacts.

Furthermore, as shown in Table 2 below, the projected 2040 average daily VMT per capita for hotel uses in TAZ 833 is 3.8. This is approximately 76 percent below the projected 2040 regional average daily VMT per capita of 16.1 for hotel uses. Also, projected 2040 average daily VMT per employee for retail uses in TAZ 833 is 6.0 miles. This is approximately 59 percent below the projected 2040 regional average daily VMT per employee of 14.6. Given that the project site is located in an area where VMT is more than 15 percent below the projected 2040 regional average, the proposed project would not contribute considerably to any substantial cumulative increase in VMT.
Table 2 – Daily Vehicle Miles Traveled – Year 2040 Conditions

<table>
<thead>
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<th>Land Use</th>
<th>Bay Area</th>
<th>TAZ 833</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Regional Average</td>
<td>Regional Average Minus 15%</td>
</tr>
<tr>
<td>Employment (Retail)</td>
<td>14.6</td>
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</tr>
<tr>
<td>Tourist Hotel</td>
<td>16.1</td>
<td>13.7</td>
</tr>
</tbody>
</table>

Source: San Francisco Transportation Information Map (SF TIM), accessed online May 2017.

Impact C-TR-2: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would result in less-than-significant cumulative impacts related to transportation. *(Less than Significant)*

The geographic context for the analysis of cumulative transportation impacts is the local roadway within the 1196 Columbus Avenue vicinity. Project impacts related to bicycle and pedestrian circulation, loading supply and demand, emergency vehicle access, and construction would be localized and site specific, and would not contribute to impacts from other development and infrastructure projects in San Francisco. As of March 2017, the 400 Bay Street and 2293-2299 Powell Street/309-311 Bay Street projects are the only active projects located within a ¼-mile from the project site. Although the proposed project would generate approximately 1,733 daily person trips, 624 daily vehicle trips and a total of 78 p.m. peak person trips, these trips would not contribute to a level of significant cumulative impact to nearby intersections. Of the 78 p.m. peak-hour person trips, 36 would be vehicle person-trips, 46 would be transit trips, 68 would be walking trips, and 23 would be trips made via other modes of transportation such as bicycles, taxi, or motorcycle. Based on the above, the project would not contribute considerably to a significant cumulative traffic impact, and the project’s cumulative impact would be less than significant.

The analysis of cumulative transit utilization considers foreseeable changes in local and regional transit service in the future, such as Muni service changes due to the Van Ness and Geary BRT projects, other Muni Forward service improvements, and the anticipated growth in ridership due to future development. As presented in the transportation study, an analysis of transit impacts across the Muni and regional screenlines was conducted to determine the extent to which an increase in transit trips associated with the proposed project would affect local and regional transit lines under cumulative (Year 2040) conditions. While some screenlines and sub-corridors would operate above Muni’s established capacity utilization threshold (85 percent) by 2040, the proposed project would contribute 1 percent or less of the transit trips on these sub-corridors and the entire screenline. Therefore, the project’s contribution to cumulative transit impacts would be less than significant.

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17 Transportation Study, p. 19-20
Bicycling trips may increase between the completion of the proposed project and the cumulative scenario due to the addition and enhancement of bicycle facilities (such as accessible bicycle parking on project sites, and the improvement of on-street bicycle facilities citywide in accordance with the Bike Plan). In particular, encouraging employees and residents to store their bicycles in secure locations to avoid conflicts with private cars and loading vehicles accessing the garage, and facilitating access to the bicycle network through on-site signage, would all serve to increase bicycling trips over time, although not to the level that would create potentially hazardous conditions for bicycles.

In general, the increased intensity of use on the project site would not result in overcrowding of sidewalks or create new potentially hazardous conditions for pedestrians under Cumulative Conditions. The proposed bulb-out at the southeast corner of Jones and Bay streets would improve pedestrian conditions by facilitating safe and easy pedestrian crossings, by providing safe spaces for pedestrians, by slowing traffic, and by increasing pedestrian visibility to drivers. Walk trips may increase between the completion of the proposed project with the addition of cumulative development due to the addition of other nearby hotel uses at 400 Bay Street and residential uses at 2293-2299 Powell Street/309-311 Bay Street to the local area. Transit improvements including the Geary and Van Ness BRT projects and Travel Demand Management (TDM) measures for new developments could over time increase the number of pedestrians accessing transit surrounding the project site, although not to the level which would induce overcrowding of sidewalks under the Cumulative Condition.

As noted previously, an increase in background automobile traffic between Existing plus Project and Cumulative Conditions is anticipated. This would result in an increase in the potential for automobile-bicycle and automobile-pedestrian conflicts at intersections and driveways in the study area. While there would be a general increase in vehicle, bicycle, and pedestrian traffic that is expected through the future cumulative scenario, the proposed project would not create potentially hazardous conditions for bicycles or pedestrians, or otherwise interfere with bicycle or pedestrian accessibility to the project site and adjoining areas. For the above reasons, the proposed project, in combination with past, present and reasonably foreseeable development in San Francisco, would have a less-than-significant impact on bicycle and pedestrian conditions.

Cumulative construction impacts would be temporary and localized, and would be resultant of nearby construction proposed projects whose construction schedules overlap with the proposed project. The trip distribution and mode split of construction workers are speculative to estimate. However, it is anticipated that the addition of the worker-related vehicle- or transit-trips would not substantially affect transportation conditions. Therefore, the proposed project would have less-than-significant cumulative construction impacts.

For these reasons, the proposed project would not make a considerable contribution to any cumulative impact related to transportation and circulation that could result from past, present, or reasonably foreseeable future projects in the project vicinity.
5. **NOISE—Would the project:**

<table>
<thead>
<tr>
<th>Topics:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
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<tr>
<td>c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>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?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>g) Be substantially affected by existing noise levels?</td>
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<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

The project site is not within an airport land use plan area, nor is it in the vicinity of a private airstrip. Therefore, Topics 5(e) and 5(f) are not applicable.

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

**Substantial Permanent Increase in Ambient Noise Levels**

Ambient noise levels in the vicinity of the project site are typical of noise levels in neighborhoods in San Francisco, which are dominated by vehicular traffic, including trucks, cars, Muni buses, emergency vehicles, and land use activities, such as commercial businesses and periodic temporary construction-related noise from nearby development, or street maintenance. An approximate doubling in traffic volumes in the area would be necessary to produce an increase in
ambient noise levels barely perceptible to most people (3 decibel (dB) increase).\textsuperscript{18} The proposed project consists of demolition of an existing commercial building and construction of a four-story, 75-room hotel. The proposed project would generate 267 daily vehicle trips on roadways with volumes that would not be doubled by the proposed project’s vehicle trips.

Noises generated by hotel uses are common and generally accepted in urban areas, including the tourist-oriented vicinity of the proposed project. The proposed project would include new fixed noise sources on the rooftop that would produce operational noise on the project site, such as heating, ventilation, and air conditioning equipment. Operation of this equipment would be subject to the City’s Noise Ordinance (Article 29 of the San Francisco Police Code). Section 2909 (a)(1) regulates noise from mechanical equipment and other similar sources on residential property. Mechanical equipment operating on commercial property must not produce a noise level more than 8 dBA above the ambient noise level at the property boundary. Section 2909 (d) states that no fixed noise source may cause the noise level measured inside any sleeping or living room in a dwelling unit on residential property to exceed 45 dBA between 10 PM and 7 AM or 55 dBA between 7 AM and 10 PM with windows open, except where building ventilation is achieved through mechanical systems that allow windows to remain closed. The proposed project would be subject to and required to comply with the Noise Ordinance.

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

\textit{Expose Persons to Noise Levels in Excess of Standards or Result in a Temporary Increase in Ambient Noise Levels}

Background noise levels along Bay Street are above 75 dBA Ldn.\textsuperscript{19, 20, 21} Because the noise levels at the project site exceed 75 dBA (Ldn), the General Plan’s Land Use Compatibility chart\textsuperscript{22} recommends that a detailed evaluation of noise reduction requirements be made for new hotel (transient lodging) development and recommended noise reduction measures be incorporated as part of the project design. Furthermore, California’s Building Standards Code (Title 24 of the

\textsuperscript{18} A decibel is a unit of measurement describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure, which is 20 micropascals.

\textsuperscript{19} Existing noise levels along these streets were estimated based on the consultation of the San Francisco Department of Public Health’s (DPH) noise map, “Noise 6 Category”.

\textsuperscript{20} 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.

\textsuperscript{21} 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.

\textsuperscript{22} The Environmental Protection element of the General Plan contains Land Use Compatibility Guidelines for Community Noise. These guidelines, which are similar to, but differ somewhat from, state guidelines promulgated by the Governor’s Office of Planning and Research, indicate maximum acceptable noise levels for various newly developed land uses.
California Code of Regulations, which at the local level is enforced by the Department of Building Inspection, contains noise insulation standards that are required for new hotel buildings. Hotel room occupants are considered noise-sensitive receptors.

As discussed above, ambient noise levels in San Francisco are largely influenced by traffic-related noise. The project site is located along a street with modeled noise levels above 75 dBA Ldn (Bay Street) and potential existing noise-generating land uses are nearby. Therefore, a noise analysis was prepared for the proposed project and the results are summarized below.23

Noise level measurements were taken at the project site as part of the noise analysis. Long-term measurements (continuous measurements with 15-minute intervals) were made at an elevation 12 feet above the sidewalk adjacent to the project site at Jones Street and Bay Street between October 23 and October 25, 2015. These noise level measurement locations are near the proposed new building’s façade-facing hotel rooms. To account for potential increase in traffic volumes in the future, a three percent increase in traffic volume per year was added consistent with the methodology used by the California Department of Transportation, corresponding to approximately a one-decibel increase over ten years. The calculated noise levels for the long-term measurements were 75 dBA Ldn at Bay Street and 69 dBA Ldn at Jones Street.

Typical building construction will generally provide exterior-to-interior noise level reduction performance of no less than 25 dB when exterior windows and doors are closed. In this case, exterior noise exposure would need to exceed 70 dBA Ldn on the upper floors and 75 dBA Ldn on the ground floor to produce interior noise levels in excess of Title 24’s interior noise criterion (45 dBA Ldn for living spaces and 50 dBA Ldn for commercial spaces). Given the calculated exterior noise level of 75 dBA Ldn along both project site frontages, the noise analysis provided recommendations to achieve the interior noise criterion of 45-50 dBA Ldn for the respective uses.

In order to achieve interior noise levels of 45 dBA Ldn and comply with Title 24, the proposed project would be required to use window and exterior door assemblies with specific sound transmission class (STC) ratings. Depending on their locations, the windows and exterior doors of the proposed building would need to have minimum STC ratings ranging from 41 to 28 on the second through fourth floors in order to achieve interior noise levels that do not exceed 45 dBA Ldn.24 Implementation of the recommendations in the noise study would ensure that the proposed project would comply with Title 24 and that the occupants of the proposed project would not be substantially affected by existing noise levels.

In compliance with Mitigation Measure NO-1 of the Housing Element EIR, the proposed project’s on-site open space would be protected from existing sources of noise in order to minimize

23 Charles M. Salter Associates Inc., 1196 Columbus Avenue, San Francisco, CA Environmental Noise Assessment, March 2015. This document is available for public review at the Planning Department, as part of Case No. 2014-002849ENV.
disruption to users of the rooftop open space. The proposed rooftop open space on the fourth floor would be shielded from traffic noise on Bay Street by the building itself. Implementation of this design feature would ensure that the proposed project’s open space would not be substantially affected by existing noise levels.

Residential uses are considered sensitive receptors for the purpose of noise impact analysis. As discussed in Section B, Project Setting, there are residential uses adjacent to the project site on Bay Street. These are the sensitive receptors closest to the project site. The proposed project would include mechanical equipment, such as heating and ventilation systems, that could produce operational noise and potentially disturb adjacent and nearby sensitive receptors. The operation of this mechanical equipment is subject to the provisions of Section 2909 of the Noise Ordinance. Compliance with the Noise Ordinance would minimize noise from building operations. Moreover, the design of any on-site noise-generating mechanical equipment would be required to include noise muffling devices or shielding to reduce noise levels that may affect adjacent and nearby sensitive receptors.

For these reasons, the proposed project would not result in a substantial permanent increase in ambient noise levels in the project vicinity and would not be substantially affected by existing noise levels. This impact would be less than significant, and no mitigation measures are necessary.

**Impact NO-2: The proposed project would not expose people to or generate excessive groundborne vibration or groundborne noise levels. (Less than Significant)**

The proposed project would be supported by a spread footings foundation. Piles would not be necessary, so there would be no groundborne noise or vibration impacts associated with pile driving during construction. The proposed project’s construction activities would be temporary in nature; once construction has been completed, groundborne noise and vibration produced by construction equipment and construction vehicles would cease.

Older buildings, particularly masonry buildings, can be damaged by excessive vibration associated with construction activities. As discussed above, construction of the proposed project would not generate excessive vibration that could damage adjacent or nearby buildings. In addition, the DBI is responsible for reviewing the building permit application to ensure that proposed construction activities, including shoring and underpinning, comply with all applicable procedures and requirements and would not materially impair adjacent or nearby buildings.

For these reasons, the proposed project would not expose people to or generate excessive groundborne vibration or groundborne noise levels. This impact would be less than significant, and no mitigation measures are necessary.
Impact NO-3: The proposed project would not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity. *(Less than Significant)*

Construction of the proposed project would temporarily increase noise levels in the project vicinity. Construction equipment would generate noise that could be considered an annoyance by occupants of nearby properties, but construction noise would fluctuate depending on the construction phase, equipment type, duration of use, and distance between the source and the listener. Furthermore, construction noise would be intermittent and limited to the construction period of the proposed project, which is expected to last 18 months.

Nearby sensitive land uses such as residences would experience temporary and intermittent noise associated with site clearance, demolition of the existing building on-site, and construction activities as well as the passage of construction trucks in and out of the project site. However, the proposed project would not include nighttime construction activities and would not involve pile driving or other unusually noisy construction activities. As discussed above, construction noise is regulated by Sections 2907 and 2908 of the Noise Ordinance. Therefore, the proposed project would result in less than significant impacts and no mitigation measures are necessary.

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

Cumulative development in the project vicinity would result in temporary and intermittent construction noise but would not introduce new sensitive receptors to an area with elevated ambient noise and vibration levels. Like the proposed project, nearby cumulative development projects would be subject to the provisions of Title 24, the Environmental Protection Element of the General Plan, and the Noise Ordinance. Compliance with these regulations would reduce the noise impacts of nearby cumulative development projects to less-than-significant levels. Construction-related vibration impacts from nearby cumulative development projects would be localized at their respective sites and would not combine to create cumulative vibration impacts. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative noise or vibration impact.
6. AIR QUALITY—Would the project:

<table>
<thead>
<tr>
<th>Topics:</th>
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<tr>
<td>Potentially Significant Impact</td>
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a) Conflict with or obstruct implementation of the applicable air quality plan?

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

d) Expose sensitive receptors to substantial pollutant concentrations?

e) Create objectionable odors affecting a substantial number of people?

Setting

Overview

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

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

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

Criteria Air Pollutants

In accordance with the state and federal CAAs, air pollutant standards are identified for the following six criteria air pollutants: ozone, carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead. These air pollutants are termed criteria air pollutants because they are regulated by developing specific public health- and welfare-based criteria as the basis for setting permissible levels. In general, the SFBAAB experiences low concentrations of most pollutants when compared to federal or state standards. The SFBAAB is designated as either in attainment or unclassified for most criteria pollutants with the exception of ozone, PM₂.₅, and PM₁₀, for which these pollutants are designated as non-attainment for either the state or federal standards. By its very nature, regional air pollution is largely a cumulative impact in that no single project is sufficient in size to, by itself, result in non-attainment of air quality standards. Instead, a project’s individual emissions contribute to existing cumulative air quality impacts. If a project’s contribution to cumulative air quality impacts is considerable, then the project’s impact on air quality would be considered significant.

Land use projects may contribute to regional criteria air pollutants during the construction and operational phases of a project. Table 3 identifies air quality significance thresholds followed by a discussion of each threshold. Projects that would result in criteria air pollutant emissions below these significance thresholds would not violate an air quality standard, contribute substantially to an air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants within the SFBAAB.

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

Table 3
Criteria Air Pollutant Significance Thresholds

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Construction Thresholds</th>
<th>Operational Thresholds</th>
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<tbody>
<tr>
<td></td>
<td>Average Daily Emissions (lbs./day)</td>
<td>Average Daily Emissions (lbs./day)</td>
</tr>
<tr>
<td>ROG</td>
<td>54</td>
<td>54</td>
</tr>
<tr>
<td>NOx</td>
<td>54</td>
<td>54</td>
</tr>
<tr>
<td>PM10</td>
<td>82 (exhaust)</td>
<td>82</td>
</tr>
<tr>
<td>PM2.5</td>
<td>54 (exhaust)</td>
<td>54</td>
</tr>
<tr>
<td>Fugitive Dust</td>
<td>Construction Dust Ordinance or other Best Management Practices</td>
<td>Not Applicable</td>
</tr>
</tbody>
</table>

**Ozone Precursors.** As discussed previously, the SFBAAB is currently designated as non-attainment for ozone and particulate matter. Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG) and oxides of nitrogen (NOx). The potential for a project to result in a cumulatively considerable net increase in criteria air pollutants, which may contribute to an existing or projected air quality violation, are based on the state and federal Clean Air Acts emissions limits for stationary sources. To ensure that new stationary sources do not cause or contribute to a violation of an air quality standard, BAAQMD Regulation 2, Rule 2 requires that any new source that emits criteria air pollutants above a specified emissions limit must offset those emissions. For ozone precursors ROG and NOx, the offset emissions level is an annual average of 10 tons per year (or 54 pounds (lbs.) per day). These levels represent emissions below which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants.

Although this regulation applies to new or modified stationary sources, land use development projects result in ROG and NOx emissions as a result of increases in vehicle trips, architectural coating and construction activities. Therefore, the above thresholds can be applied to the construction and operational phases of land use projects and those projects that result in emissions below these thresholds, would not be considered to contribute to an existing or projected air quality violation or result in a considerable net increase in ROG and NOx emissions. Due to the temporary nature of construction activities, only the average daily thresholds are applicable to construction phase emissions.

**Particulate Matter (PM10 and PM2.5).** The BAAQMD has not established an offset limit for PM2.5. However, the emissions limit in the federal NSR for stationary sources in nonattainment areas is an appropriate significance threshold. For PM10 and PM2.5, the emissions limit under NSR is 15 tons per year (82 lbs. per day) and 10 tons per year (54 lbs. per day), respectively. These emissions limits represent levels below which a source is not expected to have an impact on air quality.

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28 PM10 is often termed “coarse” particulate matter and is made of particulates that are 10 microns in diameter or smaller. PM2.5, termed “fine” particulate matter, is composed of particles that are 2.5 microns or less in diameter.
quality.\textsuperscript{29} Similar to ozone precursor thresholds identified above, land use development projects typically result in particulate matter emissions as a result of increases in vehicle trips, space heating and natural gas combustion, landscape maintenance, and construction activities. Therefore, the above thresholds can be applied to the construction and operational phases of a land use project. Again, because construction activities are temporary in nature, only the average daily thresholds are applicable to construction-phase emissions.

**Fugitive Dust.** Fugitive dust emissions are typically generated during construction phases. Studies have shown that the application of best management practices (BMPs) at construction sites significantly control fugitive dust\textsuperscript{30} and individual measures have been shown to reduce fugitive dust by anywhere from 30 to 90 percent.\textsuperscript{31} The BAAQMD has identified a number of BMPs to control fugitive dust emissions from construction activities.\textsuperscript{32} The City’s Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) requires a number of measures to control fugitive dust and the BMPs employed in compliance with the City’s Construction Dust Control Ordinance is an effective strategy for controlling construction-related fugitive dust.

**Other Criteria Pollutants.** Regional concentrations of CO in the Bay Area have not exceeded the state standards in the past 11 years and SO2 concentrations have never exceeded the standards. The primary source of CO emissions from development projects is vehicle traffic. Construction-related SO2 emissions represent a negligible portion of the total basin-wide emissions and construction-related CO emissions represent less than five percent of the Bay Area total basin-wide CO emissions. As discussed previously, the Bay Area is in attainment for both CO and SO2. Furthermore, the BAAQMD has demonstrated, based on modeling, that in order to exceed the California ambient air quality standard of 9.0 ppm (8-hour average) or 20.0 ppm (1-hour average) for CO, project traffic in addition to existing traffic would need to exceed 44,000 vehicles per hour at affected intersections (or 24,000 vehicles per hour where vertical and/or horizontal mixing is limited). Therefore, given the Bay Area’s attainment status and the limited CO and SO2 emissions that could result from a development projects, development projects would not result in a cumulatively considerable net increase in CO or SO2, and quantitative analysis is not required.

**Local Health Risks and Hazards**

In addition to criteria air pollutants, individual projects may emit toxic air contaminants (TACs). TACs collectively refer to a diverse group of air pollutants that are capable of causing chronic (i.e., of long-duration) and acute (i.e., severe but short-term) adverse effects to human health.


\textsuperscript{32} BAAQMD, CEQA Air Quality Guidelines, May 2011.
including carcinogenic effects. Human health effects of TACs include birth defects, neurological damage, cancer, and mortality. There are hundreds of different types of TACs with varying degrees of toxicity. Individual TACs vary greatly in the health risk they present; at a given level of exposure, one TAC may pose a hazard that is many times greater than another.

Unlike criteria air pollutants, TACs do not have ambient air quality standards but are regulated by the BAAQMD using a risk-based approach to determine which sources and pollutants to control as well as the degree of control. A health risk assessment is an analysis in which human health exposure to toxic substances is estimated, and considered together with information regarding the toxic potency of the substances, to provide quantitative estimates of health risks.33

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

Exposures to fine particulate matter (PM$_{2.5}$) are strongly associated with mortality, respiratory diseases, and lung development in children, and other endpoints such as hospitalization for cardiopulmonary disease.34 In addition to PM$_{2.5}$, diesel particulate matter (DPM) is also of concern. The California Air Resources Board (ARB) identified DPM as a TAC in 1998, primarily based on evidence demonstrating cancer effects in humans.35 The estimated cancer risk from exposure to diesel exhaust is much higher than the risk associated with any other TAC routinely measured in the region.

In an effort to identify areas of San Francisco most adversely affected by sources of TACs, San Francisco partnered with the BAAQMD to conduct a citywide health risk assessment based on an inventory and assessment of air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed the “Air Pollutant Exposure Zone,” were identified based on health-protective criteria that considers estimated cancer risk, exposures to fine particulate matter, proximity to freeways, and locations with particularly

33 In general, a health risk assessment is required if the BAAQMD concludes that projected emissions of a specific air toxic compound from a proposed new or modified source suggest a potential public health risk. The applicant is then subject to a health risk assessment for the source in question. Such an assessment generally evaluates chronic, long-term effects, estimating the increased risk of cancer as a result of exposure to one or more TACs.
34 SFDPH, Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review, May 2008.
vulnerable populations. The project site is not located within the Air Pollutant Exposure Zone. Each of the Air Pollutant Exposure Zone criteria is discussed below.

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

**Fine Particulate Matter.** In April 2011, the USEPA published *Policy Assessment for the Particulate Matter Review of the National Ambient Air Quality Standards*, “Particulate Matter Policy Assessment.” In this document, USEPA staff concludes that the then current federal annual PM$_{2.5}$ standard of 15 µg/m$^3$ should be revised to a level within the range of 13 to 11 µg/m$^3$, with evidence strongly supporting a standard within the range of 12 to 11 µg/m$^3$. The Air Pollutant Exposure Zone for San Francisco is based on the health protective PM$_{2.5}$ standard of 11 µg/m$^3$, as supported by the USEPA’s Particulate Matter Policy Assessment, although lowered to 10 µg/m$^3$ to account for uncertainty in accurately predicting air pollutant concentrations using emissions modeling programs.

**Proximity to Freeways.** According to the California Air Resources Board, studies have shown an association between the proximity of sensitive land uses to freeways and a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children. Siting sensitive uses in close proximity to freeways increases both exposure to air pollution and the potential for adverse health effects. As evidence shows that sensitive uses in an area within a 500-foot buffer of any freeway are at an increased health risk from air pollution, lots that are within 500 feet of freeways are included in the Air Pollutant Exposure Zone.

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37 54 Federal Register 38044, September 14, 1989.
Health Vulnerable Locations. Based on the BAAQMD’s evaluation of health vulnerability in the Bay Area, those zip codes (94102, 94103, 94105, 94124, and 94130) in the worst quintile of Bay Area Health vulnerability scores as a result of air pollution-related causes were afforded additional protection by lowering the standards for identifying lots in the Air Pollutant Exposure Zone to: (1) an excess cancer risk greater than 90 per one million persons exposed, and/or (2) PM$_{2.5}$ concentrations in excess of 9 µg/m$^3$.$^{40}$

The above citywide health risk modeling was also used as the basis in approving a series of amendments to the San Francisco Building and Health Codes, generally referred to as the Enhanced Ventilation Required for Urban Infill Sensitive Use Developments or Health Code, Article 38 (Ordinance 224-14, effective December 8, 2014) (Article 38). The purpose of Article 38 is to protect the public health and welfare by establishing an Air Pollutant Exposure Zone and imposing an enhanced ventilation requirement for all urban infill sensitive use development within the Air Pollutant Exposure Zone. In addition, projects within the Air Pollutant Exposure Zone require special consideration to determine whether the project’s activities would add a substantial amount of emissions to areas already adversely affected by poor air quality.

Construction Air Quality Impacts

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

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

Construction activities (short-term) typically result in emissions of ozone precursors and PM in the form of dust (fugitive dust) and exhaust (e.g., vehicle tailpipe emissions). Emissions of ozone precursors and PM are primarily a result of the combustion of fuel from on-road and off-road vehicles. However, ROGs are also emitted from activities that involve painting, other types of architectural coatings, or asphalt paving. The proposed project includes the demolition of an existing one-story commercial building and the construction of a new four-story, approximately 40-foot-tall, hotel with 75 rooms and 2,209 sq ft for a ground-floor bar and lounge. During the project’s approximately 18-month construction period, construction activities would have the potential to result in emissions of ozone precursors and PM, as discussed below.

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$^{40}$ San Francisco Planning Department and San Francisco Department of Public Health, *2014 Air Pollutant Exposure Zone Map (Memo and Map)*, April 9, 2014. These documents are part of San Francisco Board of Supervisors File No. 14806, Ordinance No. 224-14 Amendment to Health Code Article 38
**Fugitive Dust**

Project-related demolition, excavation, grading, and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. Although there are federal standards for air pollutants and implementation of state and regional air quality control plans, air pollutants continue to have impacts on human health throughout the country. California has found that particulate matter exposure can cause health effects at lower levels than national standards. The current health burden of particulate matter demands that, where possible, public agencies take feasible available actions to reduce sources of particulate matter exposure. According to the ARB, reducing particulate matter PM$_{2.5}$ concentrations to state and federal standards of 12 µg/m$^3$ in the San Francisco Bay Area would prevent between 200 and 1,300 premature deaths.$^{41}$

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

In response, the San Francisco Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes generally referred hereto as the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) with the intent of reducing the quantity of dust generated during site preparation, demolition and construction work in order to protect the health of the general public and of onsite workers, minimize public nuisance complaints, and to avoid orders to stop work by the Department of Building Inspection (DBI).

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

In compliance with the Construction Dust Control Ordinance, the project sponsor and the contractor responsible for construction activities at the project site would be required to use the following practices to control construction dust on the site or other practices that result in equivalent dust control that are acceptable to the Director. Dust suppression activities may include watering all active construction areas sufficiently to prevent dust from becoming airborne; increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. During excavation and dirt-moving activities, contractors shall wet sweep or vacuum the streets, sidewalks, paths, and intersections where work is in progress at the end of the

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$^{41}$ ARB, Methodology for Estimating Premature Deaths Associated with Long-term Exposure to Fine Airborne Particulate Matter in California, Staff Report, Table 4c, October 24, 2008.
workday. Inactive stockpiles (where no disturbance occurs for more than seven days) greater than 10 cubic yards or 500 square feet of excavated material, backfill material, import material, gravel, sand, road base, and soil shall be covered with a 10 mil (0.01 inch) polyethylene plastic (or equivalent) tarp, braced down, or use other equivalent soil stabilization techniques. CCSF Ordinance 175-91 restricts the use of potable water for soil compaction and dust control activities undertaken in conjunction with any construction or demolition project occurring within the boundaries of San Francisco, unless permission is obtained from the San Francisco Public Utilities Commission (SFPUC). Non-potable water must be used for soil compaction and dust control activities during project construction and demolition. The SFPUC operates a recycled water truck-fill station at the Southeast Water Pollution Control Plant that provides recycled water for these activities at no charge.

Criteria Air Pollutants

As discussed above, construction activities would result in emissions of criteria air pollutants from the use of off- and on-road vehicles and equipment. To assist lead agencies in determining whether short-term construction-related air pollutant emissions require further analysis as to whether the project may exceed the criteria air pollutant significance thresholds shown in Table 3, above, the BAAQMD, in its CEQA Air Quality Guidelines (May 2011), developed screening criteria. If a proposed project meets the screening criteria, then construction of the project would result in less-than-significant criteria air pollutant impacts. A project that exceeds the screening criteria may require a detailed air quality assessment to determine whether criteria air pollutant emissions would exceed significance thresholds. The CEQA Air Quality Guidelines note that the screening levels are generally representative of new development on greenfield sites without any form of mitigation measures taken into consideration. In addition, the screening criteria do not account for project design features, attributes, or local development requirements that could also result in lower emissions.

The proposed project includes the demolition of an existing one-story commercial building and the construction of a new four-story hotel with 75 rooms and a ground-floor bar/lounge. The proposed project would require the removal and disposal of approximately 1,200 cubic yards of soil during excavation. The size of proposed construction activities would be below the criteria air pollutant screening sizes for hotel uses (554 rooms) amount of material transport identified in the BAAQMD’s CEQA Air Quality Guidelines. Thus, quantification of construction-related criteria air pollutant emissions is not required and the proposed project’s construction activities would result in a less-than-significant criteria air pollutant impact.

Impact AQ-2: The proposed project’s construction activities would generate toxic air contaminants, including diesel particulate matter, which would expose sensitive receptors to substantial pollutant concentrations. (Less than Significant with Mitigation)

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42 A greenfield site refers to agricultural or forest land or an undeveloped site earmarked for commercial, residential, or industrial projects.
The project site is located within the Air Pollutant Exposure Zone as described above. The proposed project would include the demolition of an existing one-story commercial building and the construction of a new four-story, 75-room hotel. For the purposes of air quality evaluation, hotels are not considered sensitive land uses. Existing sensitive land uses in the project vicinity include other hotels to the north of the project site and existing residential buildings within 1,000 feet of the project site.

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

Additionally, a number of federal and state regulations are requiring cleaner off-road equipment. Specifically, both the USEPA and California have set emissions standards for new off-road equipment engines, ranging from Tier 1 to Tier 4. Tier 1 emission standards were phased in between 1996 and 2000 and Tier 4 Interim and Final emission standards for all new engines would be phased in between 2008 and 2015. To meet the Tier 4 emission standards, engine manufacturers will be required to produce new engines with advanced emission-control technologies. Although the full benefits of these regulations will not be realized for several years, the USEPA estimates that by implementing the federal Tier 4 standards, NOx and PM emissions will be reduced by more than 90 percent.

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

“Due to the variable nature of construction activity, the generation of TAC emissions in most cases would be temporary, especially considering the short amount of time such


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43 ARB, Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements, p.1 and p. 13 (Figure 4), October 2010.
44 ARB, Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements, October 2010.
46 ARB, Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements, October 2010.
equipment is typically within an influential distance that would result in the exposure of sensitive receptors to substantial concentrations. Concentrations of mobile-source diesel PM emissions are typically reduced by 70 percent at a distance of approximately 500 feet (ARB 2005). In addition, current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 40, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. This results in difficulties with producing accurate estimates of health risk.\(^4^8\)

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

The proposed project would require construction activities for the approximate 18-month construction period. Project construction activities would result in short-term emissions of DPM and other TACs. The project site is located in an area that already experiences poor air quality and project construction activities would generate additional air pollution, affecting nearby sensitive receptors and resulting in a significant impact. Implementation of Mitigation Measure M-AQ-2, Construction Air Quality, would reduce the magnitude of this impact to a less-than-significant level. While emission reductions from limiting idling, educating workers and the public and properly maintaining equipment are difficult to quantify, other measures, specifically the requirement for equipment with Tier 2 engines and Level 3 Verified Diesel Emission Control Strategy (VDECS) can reduce construction emissions by 89 to 94 percent compared to equipment with engines meeting no emission standards and without a VDECS.\(^4^9\)

Emissions reductions from Tier 0 engines do not have PM emission standards, but the United States Environmental Protection Agency’s Exhaust and Crankcase Emissions Factors for Nonroad Engine Modeling – Compression Ignition has estimated Tier 0 engines between 50 hp and 100 hp to have a PM emission factor of 0.72 g/hp-hr and greater than 100 hp to have a PM emission factor of 0.40 g/hp-hr. Therefore, requiring off-road equipment to have at least a Tier 2 engine would result in between a 25 percent and 63 percent reduction in PM emissions, as compared to off-road equipment with Tier 0 or Tier 1 engines. The 25 percent reduction comes from comparing the PM emission standards for off-road engines between 25 hp and 50 hp for Tier 2 (0.45 g/bhp-hr) and Tier 1 (0.60 g/bhp-hr). The 63 percent reduction comes from comparing the PM emission standards for off-road engines above 175 hp for Tier 2 (0.15 g/bhp-hr) and Tier 0 (0.40 g/bhp-hr). In addition to the Tier 2 requirement, ARB Level 3 VDECSs are required and would reduce PM by an additional 85 percent. Therefore, the mitigation measure would result in between an 89 percent (0.0675 g/bhp-hr) and 94 percent (0.0225 g/bhp-hr) reduction in PM emissions, as compared to equipment with Tier 1 (0.60 g/bhp-hr) or Tier 0 engines (0.40 g/bhp-hr).

\(^{48}\) BAAQMD, CEQA Air Quality Guidelines, May 2011, page 8-6.

\(^{49}\) PM emissions benefits are estimated by comparing off-road PM emission standards for Tier 2 with Tier 1 and 0. Tier 0 off-road engines do not have PM emission standards, but the United States Environmental Protection Agency’s Exhaust and Crankcase Emissions Factors for Nonroad Engine Modeling – Compression Ignition has estimated Tier 0 engines between 50 hp and 100 hp to have a PM emission factor of 0.72 g/hp-hr and greater than 100 hp to have a PM emission factor of 0.40 g/hp-hr. Therefore, requiring off-road equipment to have at least a Tier 2 engine would result in between a 25 percent and 63 percent reduction in PM emissions, as compared to off-road equipment with Tier 0 or Tier 1 engines. The 25 percent reduction comes from comparing the PM emission standards for off-road engines between 25 hp and 50 hp for Tier 2 (0.45 g/bhp-hr) and Tier 1 (0.60 g/bhp-hr). The 63 percent reduction comes from comparing the PM emission standards for off-road engines above 175 hp for Tier 2 (0.15 g/bhp-hr) and Tier 0 (0.40 g/bhp-hr). In addition to the Tier 2 requirement, ARB Level 3 VDECSs are required and would reduce PM by an additional 85 percent. Therefore, the mitigation measure would result in between an 89 percent (0.0675 g/bhp-hr) and 94 percent (0.0225 g/bhp-hr) reduction in PM emissions, as compared to equipment with Tier 1 (0.60 g/bhp-hr) or Tier 0 engines (0.40 g/bhp-hr).
the combination of Tier 2 equipment with level 3 VDECS is almost equivalent to requiring only equipment with Tier 4 Final engines, which is not yet available for engine sizes subject to the mitigation. Therefore, compliance with Mitigation Measure M-AQ-2 would reduce construction emissions impacts on nearby sensitive receptors to a less-than-significant level.

Mitigation Measure M-AQ-2: Construction Air Quality

The project sponsor or the project sponsor’s Contractor shall comply with the following:

A. Engine Requirements.

1. All off-road equipment greater than 25 hp and operating for more than 20 total hours over the entire duration of construction activities shall have engines that meet or exceed either U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 2 off-road emission standards, and have been retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy. Equipment with engines meeting Tier 4 Interim or Tier 4 Final off-road emission standards automatically meet this requirement.

2. Where access to alternative sources of power are available, portable diesel engines shall be prohibited.

3. Diesel engines, whether for off-road or on-road equipment, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions). The Contractor shall post legible and visible signs in English, Spanish, and Chinese, in designated queuing areas and at the construction site to remind operators of the two-minute idling limit.

4. The Contractor shall instruct construction workers and equipment operators on the maintenance and tuning of construction equipment, and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications.

B. Waivers.

1. The Planning Department’s Environmental Review Officer (ERO) or designee may waive the alternative source of power requirement of Subsection (A)(2) if an alternative source of power is limited or infeasible at the project site. If the ERO grants the waiver, the Contractor must submit documentation that the equipment used for on-site power generation meets the requirements of Subsection (A)(1).

2. The ERO may waive the equipment requirements of Subsection (A)(1) if: a particular piece of off-road equipment with an ARB Level 3 VDECS is technically not feasible; the equipment would not produce desired emissions reduction due to expected operating modes; installation of the equipment would create a safety hazard or impaired visibility for the operator; or, there
is a compelling emergency need to use off-road equipment that is not retrofitted with an ARB Level 3 VDECS. If the ERO grants the waiver, the Contractor must use the next cleanest piece of off-road equipment, according to the table below.

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

<table>
<thead>
<tr>
<th>Compliance Alternative</th>
<th>Engine Emission Standard</th>
<th>Emissions Control</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Tier 2</td>
<td>ARB Level 2 VDECS</td>
</tr>
<tr>
<td>2</td>
<td>Tier 2</td>
<td>ARB Level 1 VDECS</td>
</tr>
<tr>
<td>3</td>
<td>Tier 2</td>
<td>Alternative Fuel*</td>
</tr>
</tbody>
</table>

How to use the table: If the ERO determines that the equipment requirements cannot be met, then the project sponsor would need to meet Compliance Alternative 1. If the ERO determines that the Contractor cannot supply off-road equipment meeting Compliance Alternative 1, then the Contractor must meet Compliance Alternative 2. If the ERO determines that the Contractor cannot supply off-road equipment meeting Compliance Alternative 2, then the Contractor must meet Compliance Alternative 3. Alternative fuels are not a VDECS.

C. **Construction Emissions Minimization Plan.** Before starting on-site construction activities, the Contractor shall submit a Construction Emissions Minimization Plan (Plan) to the ERO for review and approval. The Plan shall state, in reasonable detail, how the Contractor will meet the requirements of Section A.

1. 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. The description 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, the description may include: 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, the description shall also specify the type of alternative fuel being used.

2. The project sponsor shall ensure that all applicable requirements of the Plan have been incorporated into the contract specifications. The Plan shall include a certification statement that the Contractor agrees to comply fully with the Plan.

3. The Contractor shall make the Plan available to the public for review on-site during working hours. The Contractor shall post at the construction site a legible and visible sign summarizing the Plan. The sign shall also state that
the public may ask to inspect the Plan for the project at any time during working hours and shall explain how to request to inspect the Plan. The Contractor shall post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way.

D. Monitoring. After start of construction activities, the Contractor shall submit quarterly reports to the ERO documenting compliance with the Plan. After completion of construction activities and prior to receiving a final certificate of occupancy, the project sponsor shall submit to the ERO a final report summarizing construction activities, including the start and end dates and duration of each construction phase, and the specific information required in the Plan.

**Operational Air Quality Impacts**

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

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

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

The proposed project includes the demolition of the existing commercial building and the construction of a four-story, 40-foot-tall building containing 75 tourist hotel rooms and a 2,209-sq-ft bar/lounge, which would generate 267 daily vehicle trips. The proposed project would be below the criteria air pollutant screening sizes for hotel uses (554 rooms) identified in the BAAQMD’s CEQA Air Quality Guidelines. Thus, quantification of project-generated criteria air pollutant emissions is not required, and the proposed project would not exceed any of the significance thresholds for criteria air pollutants, and would result in *less than significant* impact with respect to criteria air pollutants.

**Impact AQ-4:** The proposed project would generate toxic air contaminants, including diesel particulate matter, exposing sensitive receptors to substantial air pollutant concentrations. *(Less than Significant)*
As discussed above, the project site is located within the Air Pollutant Exposure Zone. The proposed project consists of the demolition of the existing building and the construction of a four-story, 40-foot-tall building containing 75 tourist hotel rooms and a 2,209-square-foot bar/lounge; the proposed land uses are considered sensitive land uses for the purpose of air quality evaluation. Existing sensitive land uses in the project vicinity include residential uses adjacent to and south of the project site, residential uses to the west on the project block, and residential uses on the northeast corner of Bay and Powell streets.

Sources of Toxic Air Contaminants

Individual projects result in emissions of toxic air contaminants primarily as a result of an increase in vehicle trips. The BAAQMD considers roads with less than 10,000 vehicles per day “minor, low-impact” sources that do not pose a significant health impact even in combination with other nearby sources and recommends that these sources be excluded from the environmental analysis. The proposed project’s 267 vehicle trips would be well below this level and would be distributed among the local roadway network, therefore an assessment of project-generated TACs resulting from vehicle trips is not required and the proposed project would not generate a substantial amount of TAC emissions that could affect nearby sensitive receptors.

Siting Sensitive Land Uses

The proposed project would include development of a hotel use on the project site, which is not considered a sensitive land use for purposes of air quality evaluation. The nearest sensitive land use to the project site is an existing residential building adjacent to the eastern property line (500 Bay Street).

Although the project site is within an APEZ, the proposed project does not include any sensitive uses (residences, schools, children’s day care centers, hospitals, and nursing and convalescent homes). In response to an initial Article 38 application submitted by the project sponsor, DPH determined that since the proposed project does not include sensitive uses, it is not subject to Article 38. Because it would not site sensitive land uses within an APEZ, the proposed project would result in a less-than-significant impact with respect to exposing sensitive receptors to substantial levels of air pollution.

Impact AQ-5: The proposed project would not conflict with, or obstruct implementation of, the 2010 Clean Air Plan. (Less than Significant)

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

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

The measures most applicable to the proposed project are transportation control measures and energy and climate control measures. The proposed project’s impact related to greenhouse gas emissions are discussed under Section E.7, Greenhouse Gas Emissions, which demonstrates that the proposed project would comply with the applicable provisions of the City’s Greenhouse Gas Reduction Strategy.

The availability of viable transportation options and the provision of bicycle parking facilities as part of the proposed project ensure that occupants could bicycle, walk, and ride transit to and from the project site instead of taking trips via private automobile. These factors ensure that the proposed project would not contribute to substantial growth in automobile trips and vehicle miles traveled. The proposed project’s anticipated 267 daily vehicle trips would result in a negligible increase in air pollutant emissions. Furthermore, the proposed project would be generally consistent with the San Francisco General Plan (General Plan), as discussed in Section C, Compatibility with Existing Zoning and Plans. Transportation control measures that are identified in the CAP are implemented by the General Plan and the Planning Code, for example, through the City’s Transit First Policy, bicycle parking requirements, and transit impact development fees. Compliance with these requirements would ensure that the proposed project includes relevant transportation control measures specified in the CAP to meet the CAP’s primary goals.

Examples of projects that could cause the disruption or delay of CAP control measures are projects that would preclude the extension of a transit line or bike path or projects that propose excessive amounts of parking above minimum parking requirements. The proposed project would add 75 tourist hotel rooms and a 2,209 sq ft bar/lounge, and no parking spaces to a dense, walkable urban area near a concentration of regional and local transit service. It would not
preclude the extension of a transit line or a bike path or any other transit improvement and thus would not disrupt or hinder implementation of control measures identified in the CAP.

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

**Impact AQ-6: The proposed project would not create objectionable odors that would affect a substantial number of people. (Less than Significant)**

Typical odor sources of concern include wastewater treatment plants, sanitary landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing facilities, fiberglass manufacturing facilities, auto body shops, rendering plants, and coffee roasting facilities. During construction, diesel exhaust from construction equipment would generate some odors. However, construction-related odors would be temporary and would not persist upon project completion. Observation indicates that the project site is not substantially affected by sources of odors. Additionally, the proposed project includes hotel and bar/lounge uses that would not create significant sources of new odors. Therefore, odor impacts would be less than significant.

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

As discussed above, regional air pollution is by its very nature largely a cumulative impact. Emissions from past, present, and future projects contribute to the region’s adverse air quality on a cumulative basis. No single project by itself would be sufficient in size to result in regional nonattainment of ambient air quality standards. Instead, a project’s individual emissions contribute to existing cumulative adverse air quality impacts. The project-level thresholds for criteria air pollutants are based on levels by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants. Therefore, because the proposed project’s construction (Impact AQ-1) and operational (Impact AQ-3) emissions would not exceed the project-level thresholds for criteria air pollutants, the proposed project would not be considered to result in a cumulatively considerable contribution to regional air quality impacts.

As discussed above, the project site is located in an area that already experiences poor air quality. The project would add temporary emissions of diesel particulate matter during construction and new vehicle trips within an area already adversely affected by air quality, resulting in a considerable contribution to cumulative health risk impacts on nearby sensitive receptors. This would be a significant cumulative impact. The proposed project would be required to implement

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51 Field observation on March 2017.
52 BAAQMD, CEQA Air Quality Guidelines, May 2011, page 2-1.
Mitigation Measure M-AQ-2, Construction Air Quality, pages 60 to 62, which could reduce construction period emissions by as much as 94 percent. Implementation of this mitigation measure would reduce the project’s contribution to cumulative air quality impacts to a less-than-significant level.

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<tr>
<th>Topics:</th>
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<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Not Applicable</th>
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<tbody>
<tr>
<td>7. GREENHOUSE GAS EMISSIONS—Would the project:</td>
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<tr>
<td>a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</td>
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<td>☒</td>
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<td>☐</td>
</tr>
<tr>
<td>b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</td>
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Greenhouse gas (GHG) emissions and global climate change represent cumulative impacts. GHG emissions cumulatively contribute to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature; instead, the combination of GHG emissions from past, present, and future projects have contributed and will contribute to global climate change and its associated environmental impacts.

The Bay Area Air Quality Management District (BAAQMD) has prepared guidelines and methodologies for analyzing GHGs. These guidelines are consistent with CEQA Guidelines Sections 15064.4 and 15183.5, which address the analysis and determination of significant impacts from a proposed project’s GHG emissions. CEQA Guidelines Section 15064.4 allows lead agencies to rely on a qualitative analysis to describe GHG emissions resulting from a project. CEQA Guidelines Section 15183.5 allows for public agencies to analyze and mitigate GHG emissions as part of a larger plan for the reduction of GHGs and describes the required contents of such a plan. Accordingly, San Francisco has prepared Strategies to Address Greenhouse Gas Emissions (GHG Reduction Strategy),53 which presents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco’s Qualified GHG Reduction Strategy in compliance with the CEQA Guidelines. The actions outlined in the strategy have resulted in a 14.5 percent reduction in GHG emissions in 2010 compared to 1990 levels, exceeding the year 2020 reduction goals outlined in the BAAQMD’s 2010 Clean Air Plan, Executive Order S-3-05 (EO S-3-05),54 and Assembly Bill 32 (AB 32), also known as the Global Warming Solutions Act.55,56

54 Executive Order S-3-05, sets forth a series of target dates by which statewide emissions of GHGs need to be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels (approximately 457 million MTCO2E);
Given that the City’s local GHG reduction targets are more aggressive than the State’s and the Region’s 2020 GHG reduction targets and are consistent with the long-term 2050 reduction targets, the City’s Greenhouse Gas Reduction Strategy is consistent with the goals of EO S-3-05, AB 32, and the BAAQMD’s 2010 Clean Air Plan. Therefore, proposed projects that are consistent with the City’s Greenhouse Gas Reduction Strategy would be consistent with the goals of EO S-3-05, AB 32, and the BAAQMD’s 2010 Clean Air Plan, would not conflict with these plans, and would therefore not exceed San Francisco’s applicable GHG threshold of significance.

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

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

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

The proposed project would increase the activity onsite with the demolition of an existing commercial building and the construction of a new four-story, 40-foot-tall building containing 75 hotel rooms and a ground floor bar/lounge, with 12 bicycle parking spaces. Therefore, the proposed project would contribute to annual long-term increases in GHGs as a result of increased vehicle trips (mobile sources) and hotel and bar/lounge 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 Commuter Benefits Program, Emergency Ride Home Program, transportation management programs, Transportation Sustainability Fee, Jobs-Housing Linkage

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55 San Francisco Department of Environment (DOE), San Francisco Climate Action Strategy, 2013 Update.
56 The Clean Air Plan, Executive Order S-3-05, and Assembly Bill 32 goals, among others, are to reduce GHGs in the year 2020 to 1990 levels.
Program, and 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 required to comply with the energy efficiency requirements of the City’s Green Building Code, Stormwater Management Ordinance, Water Conservation and Irrigation ordinances, and Energy Conservation Ordinance, which would promote energy and water efficiency, thereby reducing the proposed project’s energy-related GHG emissions. 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.

The proposed project’s waste-related emissions would be reduced through compliance with the City’s Recycling and Composting Ordinance, Construction and Demolition Debris Recovery 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 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).

Thus, the proposed project was determined to be consistent with San Francisco’s GHG reduction strategy.

The project sponsor is required to comply with these regulations, which have proven effective as San Francisco’s GHG emissions have measurably decreased when compared to 1990 emissions levels, demonstrating that the City has met and exceeded EO S-3-05, AB 32, and the Bay Area 2010 Clean Air Plan GHG reduction goals for the year 2020. Other existing regulations, such as those implemented through AB 32, will continue to reduce a proposed project’s contribution to climate change. In addition, San Francisco’s local GHG reduction targets are consistent with the long-term GHG reduction goals of EO S-3-05, EO B-30-15, AB 32, SB 32 and the Bay Area 2010 Clean Air Plan. Therefore, because the proposed projects is consistent with the City’s GHG reduction strategy, it is also consistent with the GHG reduction goals of EO S-3-05, EO B-30-15, AB 32, SB 32

57 Compliance with water conservation measures reduce the energy (and GHG emissions) required to convey, pump and treat water required for the project.
58 Embodied energy is the total energy required for the extraction, processing, manufacture and delivery of building materials to the building site. 
59 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.
60 San Francisco Planning Department, Greenhouse Gas Analysis: Compliance Checklist for 1196 Columbus Avenue, March 7, 2017.
and the Bay Area 2010 Clean Air Plan, would not conflict with these plans, and would therefore not exceed San Francisco’s applicable GHG threshold of significance. As such, the proposed project would result in a less-than-significant impact with respect to GHG emissions. No mitigation measures are necessary.

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<thead>
<tr>
<th>Topics:</th>
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<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>8. WIND AND SHADOW—Would the project:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a) Alter wind in a manner that substantially affects public areas?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?</td>
<td>☐</td>
<td>☐</td>
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<td>☐</td>
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Impact WS-1: The proposed project would not alter wind in a manner that substantially affects public areas. (Less than Significant)

A proposed project’s wind impacts are directly related to its height, orientation, design, location, and surrounding development context. Based on wind analyses for other development projects in San Francisco, a building that does not exceed a height of 85 feet generally has little potential to cause substantial changes to ground-level wind conditions. At a height of 40 feet (with an additional 12 feet for rooftop mechanical equipment and elevator penthouse), the proposed project would be about the same height as existing adjacent or nearby buildings. Given its height, orientation, design, location, and surrounding development context, the proposed 40-foot-tall building (plus 12-foot-tall mechanical equipment and elevator penthouse) has little potential to cause substantial changes to ground-level wind conditions adjacent to and near the project site. For these reasons, the proposed project would not alter wind in a manner that substantially affects public areas. This impact would be less than significant, and no mitigation measures are necessary.

Impact C-WS-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative wind impact. (Less than Significant)

As discussed above, buildings shorter than 85 feet have little potential to cause substantial changes to ground-level wind conditions. Given that the height limit in the project vicinity is 40 feet, none of the nearby cumulative development projects would be tall enough to alter wind in a manner that substantially affects public areas. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative wind impact.
Impact WS-2: The proposed project would not create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas. (Less than Significant)

In 1984, San Francisco voters approved an initiative known as “Proposition K, The Sunlight Ordinance,” which was codified as Planning Code Section 295 in 1985. 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. Public open spaces that are not under the jurisdiction of the Recreation and Park Commission as well as private open spaces are not subject to Planning Code Section 295.

Implementation of the proposed project would result in the construction of a 40-foot-tall building (with an additional 12 feet for rooftop mechanical equipment and elevator penthouse). 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 or open spaces. The shadow fan analysis prepared by the Planning Department determined that the project as proposed would not cast shadow on any nearby parks or open spaces.61

The proposed project would shade portions of streets, sidewalks, and private properties in the project vicinity at various times of the day throughout the year. Shadows on 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, any increase in shading of private properties as a result of the proposed project would not be considered a significant impact under CEQA.

For these reasons, the proposed project would not create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas. This impact would be less than significant, and no mitigation measures are necessary.

Impact C-WS-2: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative shadow impact. (Less than Significant)

As discussed above, the proposed project would not shadow any nearby parks or open spaces. The proposed project would not be tall enough to cast new shadows that would interact with shadows of cumulative projects proposed nearby, such as the 400 Bay Street and 2293-2299 Powell Street projects. Therefore, the proposed project would not contribute to any potential cumulative shadow impact on parks and open spaces.

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61 San Francisco Planning Department, Shadow Fan Analysis for 1196 Columbus Avenue, March 2017.
The sidewalks in the project vicinity are already shadowed for much of the day by densely developed, multi-story buildings. Although implementation of the proposed project and nearby cumulative development projects would add net new shadow to the sidewalks in the project vicinity, these shadows would be transitory in nature, would not substantially affect the use of the sidewalks, and would not increase shadows above levels that are common and generally expected in a densely developed urban environment.

For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative shadow impact.

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**Topics:**

| Impact RE-1: The proposed project would not 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. *(Less than Significant)* |

The proposed project would be served by the San Francisco Recreation and Parks Department (SFRPD), which administers more than 220 parks, playgrounds, and open spaces throughout the City, as well as recreational facilities including recreation centers, swimming pools, golf courses, and athletic fields, tennis courts, and basketball courts. The project site is located within an intensely developed urban neighborhood, and does not contain large regional park facilities, but includes a number of neighborhood parks and open spaces, as well as other recreational facilities. The 2014 Final Recreation and Open Space Element of the San Francisco General Plan identified areas of “high-need,” which are given highest priority for the construction of new parks and
recreation improvements. The project site is located within proximate distance to some medium- and higher-need areas, but is currently served by existing SFRPD facilities.

The neighborhood parks or other recreational facilities closest to the project site are Joseph Conrad Mini Park (0.2 miles northwest), Fay Park (0.2 miles southwest), Russian Hill Park (0.21 miles west), and the Russian Hill Open Space (0.21 miles southwest). While the proposed project would not include an increase in the residential population on the project site, the project would include the addition of 74 employees on-site and hotel guests, this increase in population would not substantially increase the demand for recreational facilities. The proposed project would partially offset the demand for recreational facilities by providing approximately 500 sq ft for a commonly accessible rooftop terrace. Although the proposed hotel guests and on-site employees may use parks, open spaces, and other recreational facilities in the project vicinity, the additional use of these recreational facilities is expected to be modest based on the size of the projected population increase.

On a citywide/regional basis, the increased demand on recreational facilities from hotel guests and 74 employees would be negligible considering the number of people living and working in San Francisco and the region as well as the number of existing and planned recreational facilities. For these reasons, implementation of the proposed project would not increase the use of existing recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. This impact would be less than significant, and no mitigation measures are necessary.

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

The proposed project would provide approximately 500 sq ft for a rooftop terrace on-site for the project hotel guests. This open space would partially offset the demand for recreational facilities. In addition, the project site is within walking distance to a number of parks, open spaces, or other recreational facilities, as discussed above. It is anticipated that these existing recreational facilities would be able to accommodate the increase in demand for recreational resources generated by the project. For these reasons, the construction of new or the expansion of existing recreational facilities, both of which might have an adverse physical effect on the environment, would not be required. This impact would be less than significant, and no mitigation measures are necessary.

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

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The proposed project would not result in the physical alteration or degradation of any recreational resources in the project vicinity or the City as a whole. Project-related construction activities would occur within the boundaries of the project site, which does not include any existing recreational resources. This impact would be less than significant, and no mitigation measures are necessary.

Impact C-RE-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact on recreational facilities or resources. (Less than Significant)

Cumulative development in the project vicinity would result in an intensification of land uses and a cumulative increase in the demand for recreational facilities and resources. The City has accounted for such growth as part of the Recreation and Open Space Element of the General Plan. In addition, San Francisco voters passed two bond measures, in 2008 and 2012, to fund the acquisition, planning, and renovation of the City’s network of recreational resources. As discussed above, there are four parks, open spaces, or other recreational facilities within 0.2 mile of the project site. It is expected that these existing recreational facilities would be able to accommodate the increase in demand for recreational resources generated by nearby cumulative development projects. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact on recreational facilities or resources.

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10. UTILITIES AND SERVICE SYSTEMS—Would the project:

- a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

- b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

- c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

- 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?
Impact UT-1: Implementation of the proposed project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board, would not exceed the capacity of the wastewater treatment provider that would serve the project, and would not require the construction of new or expansion of existing wastewater treatment or stormwater drainage facilities. (Less than Significant)

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

Implementation of the proposed project would incrementally increase wastewater flows from the project site due to the introduction of about 74 employees and hotel guests. The proposed project would incorporate water-efficient fixtures, as required by Title 24 of the California Code of Regulations and the San Francisco Green Building Ordinance. Compliance with these regulations would reduce wastewater flows and the amount of potable water used for building functions. The San Francisco Public Utilities Commission’s (SFPUC’s) infrastructure capacity plans account for projected population and employment growth. The incorporation of water-efficient fixtures into new development is also accounted for by the SFPUC, because widespread adoption can lead to more efficient use of existing capacity. For these reasons, the population increase associated with the proposed project would not require the construction of new or expansion of existing wastewater treatment facilities.

The project site has been developed since 1940, and the proposed building footprint would cover the entire project site. Implementation of the proposed project would not result in an increase in impervious surfaces. The City’s Stormwater Management Ordinance (Ordinance No. 83-10, effective May 22, 2010) requires the proposed project to maintain, reduce, or eliminate the existing volume and rate of stormwater runoff discharged from the project site. To achieve this
objective, the proposed project would implement and install appropriate stormwater management systems that retain runoff on site, promote stormwater reuse, and limit (or eliminate altogether) site discharges from entering the City's combined stormwater/sewer system. This, in turn, would limit the incremental demand on both the collection system and wastewater facilities resulting from stormwater discharges and would minimize the potential for constructing new or expanding existing stormwater drainage facilities.

For these reasons, the proposed project would not substantially increase the demand for wastewater or stormwater treatment. This impact would be less than significant, and no mitigation measures are necessary.

**Impact UT-2:** The SFPUC has sufficient water supply available to serve the proposed project from existing entitlements and resources and would not require new or expanded water supply resources or entitlements. *(Less than Significant)*

Implementation of the proposed project, which consists of a 75-room hotel and 2,209 sq ft for a ground-floor bar/lounge would add a minimum of 75 hotel guests intermittently to the site, as well as add 74 daily employees to the site, which would incrementally increase the demand for water in San Francisco. However, the proposed project would not result in a population increase and corresponding water demand beyond that assumed for planning purposes by the SFPUC’s 2010 *Urban Water Management Plan* (2010 UWMP).[^63]

All large-scale projects in California subject to CEQA are required to obtain an assessment from a regional or local jurisdiction water agency to determine the availability of a long-term water supply sufficient to satisfy project-generated water demand under Senate Bill 610 and Senate Bill 221.45. Under Senate Bill 610, a water assessment is required if a proposed project is subject to CEQA in an Environmental Impact Report or Negative Declaration and falls within any of the following categories: (1) a residential development of more than 500 dwelling units; (2) a shopping center or business employing more than 1,000 persons or having more than 500,000 sf of floor space; (3) a commercial office building employing more than 1,000 persons or having more than 250,000 sf of floor space; (4) a hotel or motel with more than 500 rooms; (5) an industrial or manufacturing establishment housing more than 1,000 persons or having more than 650,000 sf or 40 acres; (6) a mixed-use project containing any of the foregoing; or (7) any other project that would have water demand at least equal to a 500-dwelling-unit project. The proposed project would include the construction of a 75-room hotel and would not exceed any of these thresholds and, therefore, is not required to prepare a water supply assessment.

In June 2011, the SFPUC adopted a resolution finding that the 2010 UWMP adequately fulfills the requirements of the water supply assessment for urban water suppliers. The 2010 UWMP uses year 2035 growth projections prepared by the Planning Department and the Association of

Bay Area Governments to estimate future water demand. The proposed project is within the demand projections of the 2010 UWMP and would not exceed the water supply projections.

Although the total amount of water demand would increase at the project site, the proposed building would be designed to incorporate water-efficient fixtures as required by Title 24 of the California Code of Regulations and the City’s Green Building Ordinance. Because the proposed water demand could be accommodated by existing and planned water supply anticipated under the 2010 UWMP, the proposed project would not result in a substantial increase in water use and would be served from existing water supply entitlements and resources. In addition, the proposed project would include water conservation devices such as low-flow showerheads and low-flush toilets. For these reasons, there would be sufficient water supply available to serve the proposed project from existing water supply entitlements and resources, and new or expanded resources or entitlements would not be required. This impact would be less than significant, and no mitigation measures are necessary.

Impact UT-3: The proposed project would be served by a landfill with sufficient permitted capacity and would comply with federal, state, and local statutes and regulations related to solid waste. (Less than Significant)

In September 2015, the City approved an agreement with Recology, Inc. for the transport and disposal of the City’s municipal solid waste at the Recology Hay Road landfill in Solano County. The City began disposing its municipal solid waste at Recology Hay Road landfill in January 2016, and that practice is anticipated to continue for approximately nine years, with an option to renew the agreement thereafter for an additional six years. San Francisco had a goal of 75 percent solid waste diversion by 2010, which it exceeded at 80 percent diversion, and has a goal of 100 percent solid waste diversion or “zero waste” to landfill or incineration by 2020. San Francisco Ordinance No. 27-06 requires mixed construction and demolition debris to be transported by a registered transporter and taken to a registered facility that must recover for reuse or recycling and divert from landfill at least 65 percent of all received construction and demolition debris. The San Francisco Green Building Code also requires certain projects to submit a recovery plan to the Department of the Environment demonstrating recovery or diversion of at least 75 percent of all demolition debris. San Francisco’s Mandatory Recycling and Composting Ordinance No. 100-09 requires all properties and everyone in the City to separate their recyclables, compostables, and landfill trash.

The proposed project would incrementally increase total waste generation from the City; however, the proposed project would be required to comply with San Francisco Ordinance No. 27-06 and 100-09, as described above. Due to the existing and anticipated increase of solid waste recycling in the City and the agreement with Recology for diversion of solid waste to the Hay Road landfill, any increase in solid waste resulting from the proposed project would be accommodated by the existing landfills. Thus, the proposed project would have less-than-significant impacts related to solid waste.
Impact C-UT-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact on utilities and service systems. *(Less than Significant)*

The proposed project would not substantially impact utility supply or service. Nearby development would not contribute to a cumulatively substantial effect on the utility infrastructure within the project area. Furthermore, existing service management plans address anticipated growth in the surrounding area and the region. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact on utilities and service systems.

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**11. PUBLIC SERVICES—Would the project:**

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<th>Topics:</th>
<th>Potentially Significant Impact</th>
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<th>Less Than Significant Impact</th>
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<th>Not Applicable</th>
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<td>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?</td>
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The proposed project’s impacts on parks are discussed under Section E.9, Recreation. Impacts on other public services are discussed below.

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

The project site receives fire protection and emergency medical services from the San Francisco Fire Department’s Battalion 3, which includes Fire Station No. 28 located at 1814 Stockton Street, approximately 0.5 mile southeast of the project site. The project site receives police protection services from the San Francisco Police Department’s Central Station at 766 Vallejo Street, approximately 0.6 mile southeast of the project site. Implementation of the proposed project would add a minimum of 75 temporary hotel guests and 74 daily employees to the project site, which would increase the demand for fire protection, emergency medical, and police protection services. This increase in demand would not be substantial given the overall demand for such

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services on a citywide basis. Fire protection, emergency medical, and police protection resources are regularly redeployed based on need in order to maintain acceptable service ratios. Moreover, the proximity of the project site to Fire Station No. 28 and Central Station would help minimize Fire Department and Police Department response times should incidents occur at the project site. For these reasons, implementation of the proposed project would not require the construction of new or alteration of existing fire and police facilities. This impact would be less than significant, and no mitigation measures are necessary.

Impact PS-2: The proposed project could increase the population of school-aged children and the demand for school services, but not to the extent that would require new or physically altered school facilities, the construction of which could result in significant environmental impacts. (Less than Significant)

Implementation of the proposed project would result in the construction of a 75-room hotel and a 2,209-sq-ft bar/lounge on the ground floor, which would add a minimum of 75 hotel guests and 74 employees on the project site. No new permanent residents would be added to the project site, and thus no new demand for schools operated by the San Francisco Unified School District (SFUSD), or private schools in the vicinity. For these reasons, implementation of the proposed project would not result in a substantial unmet demand for school facilities and would not require the construction of new or alteration of existing school facilities. This impact would be less than significant, and no mitigation measures are necessary.

Impact PS-3: The proposed project would increase demand for other public services, but not to the extent that would require new or physically altered governmental facilities, the construction of which could result in significant environmental impacts. (Less than Significant)

Implementation of the proposed project would result in the construction of a 75-room hotel and a 2,209-sq-ft bar/lounge on the ground floor, which would add a minimum of 75 hotel guests and 74 employees on the project site. Given the nature of the proposed uses on the project site, no new permanent residents would be added and there would be no substantial increase in demand for other public services such as libraries. Additionally, any increases in demand would also not be substantial given the overall demand for public services on a citywide basis. For example, the San Francisco Public Library operates 27 branches throughout San Francisco, and it is anticipated that the North Beach Branch, which is 0.2 mile south of the project site, would be able to accommodate the negligible increase in demand for library services generated by the proposed project. For these reasons, implementation of the proposed project would not require the construction of new or alteration of existing governmental facilities. This impact would be less than significant, and no mitigation measures are necessary.

Impact C-PS-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact on public services. (*Less than Significant*)

Cumulative development in the project vicinity would result in an intensification of land uses and a cumulative increase in the demand for fire protection, police protection, school services, and other public services. The Fire Department, the Police Department, the SFUSD, and other City agencies have accounted for such growth in providing public services to the residents of San Francisco. Nearby cumulative development projects would be subject to many of the same development impact fees applicable to the proposed project. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact on public services.

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<th>Topics:</th>
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<td>12. BIOLOGICAL RESOURCES—Would the project:</td>
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<td>a)</td>
<td>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 Wildlife or U.S. Fish and Wildlife Service?</td>
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<td>b)</td>
<td>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 Wildlife or U.S. Fish and Wildlife Service?</td>
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<td>c)</td>
<td>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?</td>
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<td>d)</td>
<td>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?</td>
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<td>e)</td>
<td>Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?</td>
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Impact BI-1: The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service and would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. *(No Impact)*

The project site is a previously developed lot in a built urban environment and does not include any candidate, sensitive, or special-status species, any riparian habitat, or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Implementation of the proposed project would not modify any natural habitat and would have no impact on any candidate, sensitive, or special-status species, any riparian habitat, or other sensitive natural community.

Impact BI-2: The proposed project would not 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. *(No Impact)*

The project site does not include any federally protected wetlands, as defined by Section 404 of the Clean Water Act. Implementation of the proposed project would have no impact on wetlands.

Impact BI-3: The proposed project would not 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. *(Less than Significant)*

San Francisco is within the Pacific Flyway, a major north-south route of travel for migratory birds along the western portion of the Americas. Multi-story buildings are potential obstacles that can injure or kill birds in the event of a collision, and bird strikes are a leading cause of worldwide declines in bird populations. Planning Code Section 139, Standards for Bird-Safe Buildings, establishes building design standards to reduce avian mortality rates associated with bird strikes. This ordinance focuses on location-specific hazards and building feature-related hazards.
Location-specific hazards apply to buildings in, or within 300 feet of and having a direct line of sight to, an Urban Bird Refuge, which is defined as an open space “two acres and larger dominated by vegetation, including vegetated landscaping, forest, meadows, grassland, or wetlands, or open water.” The project site is not located in or within 300 feet of an Urban Bird Refuge, so the standards related to location-specific hazards are not applicable to the proposed project. Feature-related hazards, which can occur on buildings anywhere in San Francisco, are defined as freestanding glass walls, wind barriers, skywalks, balconies, and greenhouses on rooftops that have unbroken glazed segments of 24 sq ft or larger. The proposed project would not include any of the feature-related hazards mentioned above.

Although migratory birds pass through San Francisco, the project site does not include any vegetation that could provide habitat for migratory birds. Nesting birds, their nests, and their eggs are protected by the California Fish and Game Code (Sections 3503 and 3503.5) and the federal Migratory Bird Treaty Act, and the proposed project is subject to these regulations.

For these reasons, the proposed project would not interfere substantially with the movement of any native resident or migratory wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. This impact would be less than significant, and no mitigation measures are necessary.

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

There are no existing trees or other vegetation on the project site that would need to be removed as part of the proposed project. Implementation of the proposed project would include the planting of new street trees along the Bay Street and Columbus Avenue frontages, in compliance with the provisions of the San Francisco Green Landscape Ordinance. The proposed project would not conflict with any local policies or ordinances that protect biological resources, and no impact would occur.

Impact BI-5: The proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. (Not Applicable)

The project site is not within an area covered by an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, state, or regional habitat conservation plan. Therefore, significance criterion 12f is not applicable to the proposed project.

Impact C-BI-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact related to biological resources. (Less than Significant)
Cumulative development in the project vicinity would result in the construction of multi-story buildings that may include features that could injure or kill birds in the event of a collision, or would result in the removal of existing street trees or other vegetation on those respective project sites. However, nearby cumulative development projects would be subject to the same bird-safe building and urban forestry ordinances applicable to the proposed project. Compliance with these ordinances would reduce the effects of nearby cumulative development projects to less-than-significant levels. Moreover, there are no candidate, sensitive, or special-status species, any riparian habitat, or other sensitive natural community in the project vicinity. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact on biological resources.

### Topics: Potentially Significant Impact
- Less Than Significant Impact
- Mitigation Incorporated
- Less Than Significant Impact
- No Impact
- Not Applicable

**13. GEOLOGY AND SOILS—Would the project:**

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)

ii) Strong seismic ground shaking?

iii) Seismic-related ground failure, including liquefaction?

iv) Landslides?

b) Result in substantial soil erosion or the loss of topsoil?

c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
The proposed project would connect to the City’s sewer and stormwater collection and treatment system and would not use a septic water disposal system. Therefore, Topic 13e is not applicable to the project site.

**Impact GE-1:** The proposed project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, or landslides, and would not be located on unstable soil that could result in lateral spreading, subsidence, liquefaction, or collapse. *(Less than Significant)*

A geotechnical investigation was conducted to assess the geologic conditions underlying the project site and provide recommendations related to the proposed project’s design and construction. The findings and recommendations, presented in a geotechnical report, are discussed below.\(^{67}\)

The geotechnical investigation included the drilling of two test borings on the project site to a depth of 51 feet below ground surface (bgs). The project site is underlain by 15 to 18 feet of fill consisting of clay, sand, and gravel. This layer of fill is underlain by dune sand with variable amounts of silt. Groundwater was encountered about 18 to 19 feet bgs.

The San Francisco Bay Area is a seismically active region. The project site is not within an Alquist-Priolo Earthquake Fault Zone, and there are no known active faults that run underneath the project site or in the project vicinity. The closest active fault to the project site is the San Andreas Fault, which is about eight miles to the southwest. Nonetheless, the project site is subject to strong seismic ground shaking. The project site is not in a landslide zone, but it is in a liquefaction zone.

The geotechnical report concludes that the potential for lateral spreading at the project site is low, but there are potentially liquefiable sand layers underlying the project site.\(^{68}\) The geotechnical report includes recommendations related to seismic design, excavation, materials for fill, ground improvement, foundations, lateral resistance, grading, underground utilities, slabs-on-grade, etc.

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\(^{67}\) Geocon Consultants, Inc., *Geotechnical Investigation, Proposed 5-Story Hotel, 1196 Columbus Avenue, San Francisco, California* (hereinafter “Geotechnical Report”), December 2015.

\(^{68}\) Geotechnical Report, p. 4.
waterproofing, retaining wall design, and surface drainage. Implementation of these recommendations would ensure that the proposed project would not cause the soil underlying the project site to become unstable and result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

The proposed project is required to comply with the seismic safety standards set forth in the San Francisco Building Code (Building Code). The Department of Building Inspection (DBI) is the City agency responsible for reviewing the proposed project’s building permit application, structural drawings and calculations, and geotechnical report and ensuring that the proposed project complies with the seismic safety standards and other applicable requirements of the Building Code. Project compliance with the recommendations of the geotechnical report and the Building Code would ensure that the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, or landslides would be low. This impact would be less than significant, and no mitigation measures are necessary.

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

The project site is fully developed and is currently occupied by a one-story commercial building. For these reasons, construction of the proposed project would not result in the loss of topsoil. Site preparation and excavation activities would disturb soil to a depth of 14 feet bgs, creating the potential for windborne and waterborne soil erosion. Sloping terrain is more susceptible to soil erosion than flat terrain. Since the project site is flat, construction activities would not result in substantial soil erosion. In addition, the construction contractor would be required to implement best management practices to prevent erosion and discharge of sediment into construction site stormwater runoff (see Section E.14, Hydrology and Water Quality). This impact would be less than significant, and no mitigation measures are necessary.

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

San Francisco is within an area where less than 50 percent of the soil consists of clay with high swelling potential (i.e., expansive soils). Expansive soils shrink or swell substantially with changes in moisture content and generally contain a high percentage of clay particles. As discussed above, the project site is underlain by fill consisting of clay, sand, and gravel. This layer of fill is underlain by dune sand with variable amounts of silt. It is not known whether expansive soils, as defined in Table 18-1-B of the Uniform Building Code, underlie the project site. However, the DBI would analyze the potential for impacts related to expansive soils as part of its review of the proposed project’s building permit application and geotechnical report. The proposed project would be required to comply with any recommendations made by the DBI to address potential impacts related to expansive soils. For these reasons, implementation of the
proposed project would not create substantial risks to life or property. This impact would be less than significant, and no mitigation measures are necessary.

**Impact GE-4:** The proposed project would not change substantially the topography or any unique geologic or physical features of the site and would not directly or indirectly destroy a unique paleontological resource or site. *(Less than Significant)*

Paleontological resources include fossilized remains or traces of animals, plants, and invertebrates, including their imprints, from a previous geological period. Fossils are more likely to be found in certain geological formations (i.e., sedimentary rocks) than in others. As such, the potential for impacts on paleontological resources can be assessed based on information about the soils underlying the project site.

Based on the geotechnical investigation, the project site is underlain by 15 to 18 feet of artificial fill and dune sands from 18 to 45 feet below ground surface.\(^{69}\) Also, older alluvium material was observed beneath the dune sand deposits at a depth of approximately 45 feet. The proposed project would involve excavation to a depth of approximately 14 feet to accommodate the basement level and foundation. Excavation would extend into the existing artificial fill covering the project site. Artificial fills do not contain paleontological resources, and dune sands are originally derived from rocks, but have been altered, weathered, or reworked to a degree such that the discovery of intact fossils would be nearly impossible. Therefore, the project would not have a significant impact on any unique paleontological resources and no mitigation is necessary.

The project site is flat, and implementation of the proposed project would not change the topography of the project site. The project site is fully developed and there are no unique geologic or physical features on the project site that could be altered by implementation of the proposed project.

**Impact C-GE-1:** The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact related to geology and soils, or to unique paleontological resources. *(Less than Significant)*

Environmental impacts related to geology and soils are generally site-specific. Nearby cumulative development projects would be subject to the same seismic safety standards and design review procedures applicable to the proposed project. Compliance with the seismic safety standards and the design review procedures would ensure that the effects from nearby cumulative development projects would be reduced to less-than-significant levels. Impacts on paleontological resources are also site-specific and generally do not combine with impacts of other projects. As discussed above, the project would not affect any unique paleontological resources, and thus would not combine with impacts of any other projects on such resources. For these reasons, the proposed project would not combine with past, present, and reasonably

\(^{69}\) *Geotechnical Report*, p. 5.
foreseeable future projects in the project vicinity to create a significant cumulative impact related to geology and soils or to unique paleontological resources.

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<thead>
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<tbody>
<tr>
<td>14. HYDROLOGY AND WATER QUALITY— Would the project:</td>
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<tr>
<td>a) Violate any water quality standards or waste discharge requirements?</td>
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<tr>
<td>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)?</td>
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</tr>
<tr>
<td>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?</td>
<td>☐</td>
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<tr>
<td>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?</td>
<td>☐</td>
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<tr>
<td>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?</td>
<td>☐</td>
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<tr>
<td>f) Otherwise substantially degrade water quality?</td>
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</tr>
<tr>
<td>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?</td>
<td>☐</td>
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<tr>
<td>h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?</td>
<td>☐</td>
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<tr>
<td>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?</td>
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</table>
Impact HY-1: The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality. *(Less than Significant)*

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

As discussed under Section E.13, Geology and Soils, groundwater is approximately 18 to 19 feet below ground surface and would not be encountered at the planned excavation depth of 14 feet; thus, dewatering for the proposed project is unlikely be necessary during construction. Nevertheless, if, any groundwater is encountered during construction, it would be discharged into the combined stormwater/sewer system subject to the requirements of the San Francisco Sewer Use Ordinance (Ordinance No. 19-92, amended by Ordinance No. 116-97), as supplemented by Department of Public Works Order No. 158170. These regulations require a permit from the Wastewater Enterprise Collection System Division of the San Francisco Public Utilities Commission (SFPUC). A permit may be issued only if an effective pretreatment system is maintained and operated. Each permit for such discharge shall contain specified water quality standards and may require the project sponsor to install and maintain meters to measure the volume of the discharge to the combined sewer system.

Construction activities such as excavation, earthmoving, and grading would expose soil and could result in erosion and excess sediments being carried in stormwater runoff to the combined stormwater/sewer system. In addition, stormwater runoff from temporary on-site use and storage of vehicles, fuels, waste, and other hazardous materials could carry pollutants to the combined stormwater/sewer system if proper handling methods are not employed. Runoff from the project site would drain into the City’s combined stormwater/sewer system, ensuring that such runoff is properly treated at the Southeast Treatment Plant before being discharged into San Francisco Bay.

Because it would disturb more than 5,000 square feet of ground surface, the proposed project is subject to the San Francisco Construction Site Runoff Ordinance. Accordingly, the project sponsor must prepare and implement an erosion and sediment control plan during project construction.
The erosion and sediment control plan must include best management practices (BMPs) designed to prevent discharge of sediment and other pollutants from the site, and is subject to review and approval by the SFPUC.

For these reasons, the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality. This impact would be less than significant, and no mitigation measures are necessary.

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

As discussed under Section E.13, Geology and Soils, groundwater is approximately 18 to 19 feet below ground surface and would not be encountered at the planned excavation depth of 14 feet; thus, dewatering for the proposed project is unlikely to be necessary during construction. However, if groundwater were encountered during onsite excavation, dewatering activities would be necessary. Construction dewater, if necessary, would represent a temporary condition on the underlying groundwater table. The project would not require long-term dewatering, and does not propose to extract any underlying groundwater supplies. In addition, the project site is located in the Downtown San Francisco Groundwater Basin. This basin is not used as a drinking water supply and no plans for development of this basin exist for groundwater production. For these reasons, the proposed project would not deplete groundwater supplies or substantially interfere with groundwater recharge. This impact would be less than significant, and no mitigation measures are necessary.

**Impact HY-3:** The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, would not substantially increase the rate or amount of surface runoff in a manner that would result in substantial erosion, siltation, or flooding on- or off-site, and would not 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. *(Less than Significant)*

The project site is completely covered by impervious surfaces. Implementation of the proposed project would not alter drainage patterns in a manner that would result in substantial erosion, siltation, or flooding. Runoff from the project site would continue to drain into the City’s combined stormwater/sewer system. Compliance with the City’s Stormwater Management Ordinance would ensure that the proposed project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. This impact would be less than significant, and no mitigation measures are necessary.
Impact HY-4: The proposed project would not place housing within a 100-year flood hazard area and would not place structures that would impede or redirect flood flows within a 100-year flood hazard area. *(Less than Significant)*

The proposed project would not place housing within a 100-year flood hazard area and would not place structures that would impede or redirect flood flows within a 100-year flood hazard area. The project site is within an area identified by the SFPUC as prone to flooding during storms when storm flows exceed the capacity of the combined sewer system. During the building permit review process, the SFPUC would require design features necessary to minimize the potential of a sewer backup during storm events and minimize the potential of street storm flow from entering the property. This impact would be less than significant, and no mitigation measures are necessary.

Impact HY-5: The proposed project would not 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, or involving inundation by seiche, tsunami, or mudflow. *(Less than Significant)*

A seiche is a periodic oscillation (rise and fall) of the surface of an enclosed or semi-enclosed body of water that can be caused by atmospheric or seismic disturbances. Tidal records for San Francisco Bay show that the 1906 earthquake caused a seiche of approximately four inches. A temporary four-inch rise in the water level of San Francisco Bay would not reach the project site, which is 0.2 mile south of the shoreline. For these reasons, the proposed project would not be at risk of inundation by seiche. As shown on Map 5, Tsunami Hazard Zones, San Francisco, 2012, in the Community Safety Element of the General Plan, the project site is not in a tsunami hazard zone, so the proposed project would not be at risk of inundation by tsunami. The project site is not in a landslide zone, so the proposed project would not be at risk of inundation by mudflow. Therefore, significance criterion 14j is not applicable to the proposed project.

Impact C-HY-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact related to hydrology and water quality. *(Less than Significant)*

Cumulative development in the project vicinity would result in an intensification of land uses, a cumulative increase in water consumption, and a cumulative increase in wastewater generation. The SFPUC has accounted for such growth in its service projections. Nearby cumulative development projects would be subject to the same water conservation, stormwater management, and wastewater discharge ordinances applicable to the proposed project. For these reasons, the

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72 San Francisco Planning Department, GIS database geology layer, accessed January 27, 2016.
The proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact related to hydrology and water quality.

### Topics:

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<tr>
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<td>15. HAZARDS AND HAZARDOUS MATERIALS—Would the project:</td>
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<td>a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</td>
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<tr>
<td>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?</td>
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<td>c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</td>
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<td>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?</td>
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<td>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?</td>
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<td>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?</td>
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<tr>
<td>g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</td>
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<tr>
<td>h) Expose people or structures to a significant risk of loss, injury or death involving fires?</td>
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</table>

The project site is not located within an airport land use plan area or in the vicinity of a private airstrip. Therefore, Topics 15(e) and 15(f) are not applicable.
Impact HZ-1: The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. *(Less than Significant)*

The proposed project’s tourist hotel and bar/lounge uses would involve the use of relatively small quantities of hazardous materials such as cleaners and disinfectants for routine purposes. These products are labeled to inform users of potential risks and to instruct them in appropriate handling procedures. Most of these materials are consumed through use, resulting in relatively little waste. For these reasons, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. This impact would be less than significant, and no mitigation measures are necessary.

Impact HZ-2: The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. *(Less than Significant)*

The project site is not included on a list of hazardous materials sites compiled by the California Department of Toxic Substance Control pursuant to Government Code Section 65962.5. The project site is located in a Maher Area, meaning that it is known or suspected to contain contaminated soil and/or groundwater.\(^{73}\) In addition, the proposed project would require excavation to a depth of 14 feet below ground surface and the disturbance of more than 1,200 cubic yards of soil. For these reasons, the proposed project is subject to Health Code Article 22A (also known as the Maher Ordinance), which is administered and overseen by the Department of Public Health (DPH). The project sponsor is required to retain the services of a qualified professional to prepare a Phase I Environmental Site Assessment (ESA) that meets the requirements of Health Code Section 22.A.6.

The Phase I ESA would determine the potential for site contamination and level of exposure risk associated with the proposed project. Based on that information, the project sponsor may be required to conduct soil and/or groundwater sampling and analysis. Where such analysis reveals the presence of hazardous substances in excess of state or federal standards, the project sponsor is required to submit a site mitigation plan (SMP) to the DPH or other appropriate state or federal agencies and to remediate any site contamination in accordance with an approved SMP prior to the issuance of any building permit. A Phase I ESA has been prepared to assess the potential for site contamination, and the findings are discussed below.\(^{74}\)


\(^{74}\) Cardno ATC, *Phase I Environmental Site Assessment, 1196 Columbus Avenue* (hereinafter “Environmental Site Assessment”), October 27, 2014.
The project site was occupied by a gas station from 1925 through 1989. The former gas station was demolished in 1989 with four underground storage tanks (USTs) removed from the site. In 1996, a diesel tank was discovered and was removed due to leakage impacting groundwater. Subsequent soil excavation and removal activities were performed in 1996. According to the Phase I ESA, UST removal documentation provided by the DPH Local Oversight Program indicated that all USTs have been removed from the project site.75 A Remedial Action Completion Certification, dated September 5, 1996, confirms the completion of site investigation and remedial action for the four USTs formerly on the project site. Three 10,000-gallon gasoline USTs and one 800-gallon waste oil UST were excavated and removed in November 1989. Abatement efforts included the treatment and disposal of approximately 900 to 1,000 cubic yards of soil in August through October of 1991. USTs were excavated and over 900 cubic yards of contaminated soil was overexcavated to depth of 17 feet below ground surface. On-site monitoring wells indicated low to no detection of petroleum hydrocarbons. The completion certification noted that the primary source of contamination has been removed from the site. Between 1995 to present, the existing commercial building has been on the project site.

The Phase I ESA concludes that the closed onsite LUST case is considered to represent an historical recognized environmental condition and no additional investigation is warranted.76 Required compliance with federal and state regulations and the Maher Ordinance would ensure that implementation of the proposed project would not create a significant hazard to the public or the environment. This impact would be less than significant, and no mitigation measures are necessary.

Impact HZ-3: The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. (Less than Significant)

There is one school within a quarter-mile of the project site: Yick Wo Alternative Elementary School located at 2245 Jones Street (approximately ¼-mile southwest). As discussed under Impact HZ-1, the proposed project would include the use of common household items in quantities too small to create a significant hazard to the public or the environment. The proposed tourist hotel and bar/lounge uses would not produce hazardous emissions and would not involve the handling of hazardous or acutely hazardous materials, substances, or waste. This impact would be less than significant, and no mitigation measures are necessary.

Impact HZ-4: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and would not expose people or structures to a significant risk of loss, injury, or death involving fires. (Less than Significant)

75 Environmental Site Assessment, p. 14.
76 Environmental Site Assessment, p. 26.
San Francisco ensures fire safety primarily through provisions of the *Building* and *Fire Codes*. Final building plans would be reviewed and approved by the San Francisco Fire Department (as well as the Department of Building Inspection), to ensure conformance with these provisions. In this way, potential fire hazards, including those associated with hydrant water pressures and emergency access, would be mitigated during the permit review process. Compliance with fire safety regulations would ensure that the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan or expose people or structures to a significant risk of loss, injury, or death involving fires.

The implementation of the proposed project could add incrementally to traffic conditions in the immediate area in the event of an emergency evacuation. However, the proposed project would have a contribution to traffic conditions that would not be substantial within the context of the dense urban setting of the project site and it is expected that project-related traffic would be dispersed within the existing street grid, such that there would be no significant adverse impacts on nearby traffic conditions. Therefore, the proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan and this impact would be less than significant and no mitigation is necessary.

**Impact C-HZ-1:** The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact related to hazards and hazardous materials. *(Less than Significant)*

Environmental impacts related to hazards and hazardous materials are generally site-specific. Nearby cumulative development projects would be subject to the same fire safety and hazardous materials cleanup ordinances applicable to the proposed project. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact related to hazards and hazardous materials.

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<tr>
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<td><strong>16. MINERAL AND ENERGY RESOURCES</strong>—Would the project:</td>
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<tr>
<td>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?</td>
<td>⬜</td>
<td>⬜</td>
<td>⬜</td>
<td>⬜</td>
<td>✓</td>
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<tr>
<td>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?</td>
<td>⬜</td>
<td>⬜</td>
<td>⬜</td>
<td>⬜</td>
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Case No. 2014-002849ENV  93  1196 Columbus Avenue
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?

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

All land in the City of San Francisco, including the project site, is designated by the CGS as Mineral Resource Zone 4 (MRZ-4) under the Surface Mining and Reclamation Act of 1975. The MRZ-4 designation indicates that adequate information does not exist to assign the area to any other MRZ; thus, the area is not one designated to have significant mineral deposits. The project site has previously been developed, and future evaluations of the presence of minerals at this site would therefore not be affected by the proposed project. Further, the development and operation of the proposed project would not have an impact on any off-site operational mineral resource recovery sites.

In addition, because the site has been designated as having no known mineral deposits, the proposed project would not result in the loss of availability of a locally- or regionally-important mineral resource, and would have no impact on mineral resources.

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

In California, energy consumption in buildings is regulated by Title 24 of the California Code of Regulations. Title 24 includes standards that regulate energy consumption for the heating, cooling, ventilation, and lighting of residential and nonresidential buildings. In San Francisco, documentation demonstrating compliance with Title 24 standards is required to be submitted with a building permit application. Compliance with Title 24 standards is enforced by the San Francisco Department of Building Inspection. The proposed project would comply with the standards of Title 24 and the requirements of the San Francisco Green Building Ordinance thus minimizing the amount of fuel, water, or energy used during its construction and operational phases. The proposed project would not encourage activities that result in the use of large amounts of fuel, water, or energy, or use them in a wasteful manner. This impact would be less than significant, and no mitigation measures are necessary.

Impact C-ME-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact on mineral and energy resources. *(Less than Significant)*
As discussed above, San Francisco is not a designated area of significant mineral deposits and does not have locally important mineral resource recovery sites. Implementation of nearby cumulative development projects would not affect any operational mineral resource recovery sites. In addition, nearby cumulative development projects would be subject to the same energy conservation, water conservation, recycling and composting, and construction demolition and debris ordinances applicable to the proposed project. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact on mineral and energy resources.

17. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

—Would the project

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)) or timberland (as defined by Public Resources Code Section 4526)?

d) Result in the loss of forest land or conversion of forest land to non-forest use?

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use?

Impact AF-1: The proposed project would not convert farmland to non-agricultural use, would not conflict with existing zoning for agricultural use or a Williamson Act contract, would not conflict with existing zoning for forest land or timberland, would not result in the loss of forest land or conversion of forest land to non-forest use, and would not involve other changes
in the existing environment which could result in conversion of farmland to non-agricultural use or forest land to non-forest use. *Not Applicable*

The project site does not contain agricultural uses, is not zoned for agricultural use, and is not subject to a Williamson Act contract. The project site does not contain forest land or timberland as defined in Public Resources Code Section 12220(g) and Public Resources Code Section 4526, respectively. Therefore, significance criteria 17a through 17e are not applicable to the proposed project.

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<tr>
<td>18. MANDATORY FINDINGS OF SIGNIFICANCE—Would the project:</td>
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<tr>
<td>a) Have the potential to degrade the quality of the environment,</td>
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<td>substantially reduce the habitat of a fish or wildlife species, cause</td>
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<td>a fish or wildlife population to drop below self-sustaining levels,</td>
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<td>threaten to eliminate a plant or animal community, reduce the number</td>
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<td>or restrict the range of a rare or endangered plant or animal, or</td>
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<td>eliminate important examples of the major periods of California</td>
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<td>history or prehistory?</td>
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<td>b) Have impacts that would be individually limited, but cumulatively</td>
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<td>considerable? (&quot;Cumulatively considerable&quot; means that the incremental</td>
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<td>effects of a project are considerable when viewed in connection with</td>
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<td>the effects of past projects, the effects of other current projects,</td>
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<td>and the effects of probable future projects.)</td>
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<td>c) Have environmental effects that would cause substantial adverse</td>
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<td>effects on human beings, either directly or indirectly?</td>
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The proposed project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. As discussed in Section E.3, Cultural Resources, implementation of the proposed project would not result in a substantial adverse change in the significance of an archeological resource or a tribal cultural resource and would not disturb human remains. As discussed in Section E.13, Geology and Soils, implementation of the proposed project would not directly or indirectly destroy a unique paleontological resource or site. For these reasons, the proposed

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project would not result in the elimination of important examples of major periods of California history or prehistory.

The proposed project would not combine with past, present, or reasonably foreseeable future projects to create significant cumulative impacts related to any of the topics discussed in Section E, Evaluation of Environmental Effects, pages 22-98. There would be no significant cumulative impacts to which the proposed project would make cumulatively considerable contributions.

As discussed in Section E.5, Noise, construction of the proposed project could generate temporary noise levels that would affect nearby residents and other sensitive receptors. Required compliance with the standards of Title 24 and the San Francisco Noise Ordinance would reduce these impacts to less-than-significant levels. As discussed in Section E.6, Air Quality, construction of the proposed project would result in emissions of toxic air contaminants (TACs) that have the potential to cause adverse effects on human health. During the proposed project’s construction period, nearby sensitive receptors would be exposed to substantial pollutant concentrations. Implementation of Mitigation Measure M-AQ-2: Construction Air Quality would reduce these impacts to less-than-significant levels. For these reasons, the proposed project would not result in environmental effects that would cause substantial adverse effects on human beings.

F. MITIGATION MEASURES AND IMPROVEMENT MEASURES

The following mitigation measures have been identified to reduce potentially significant environmental impacts resulting from the proposed project to less-than-significant levels. No improvement measures were identified.78

Mitigation Measures

Mitigation Measure M-CR-2: Archeological Testing

Based on a reasonable presumption that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of an archaeological consultant from the rotational Department Qualified Archaeological Consultants List (QACL) maintained by the Planning Department archaeologist. The project sponsor shall contact the Department archeologist to obtain the names and contact information for the next three archeological consultants on the QACL. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant’s work shall be conducted in accordance with this measure at the

78 Agreement to Implement Mitigation and Improvement Measures, Case No. 2014-002849ENV, 1196 Columbus Avenue, _____, 2016.
direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Sect. 15064.5 (a) and (c).

Consultation with Descendant Communities: On discovery of an archeological site79 associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group an appropriate representative80 of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to offer recommendations to the ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Final Archaeological Resources Report shall be provided to the representative of the descendant group.

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

At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the ERO. If based on the archeological testing program the archeological consultant finds that significant archeological resources may be present, the ERO in consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or an archeological data recovery program. No archeological data recovery shall be undertaken without the prior approval of the ERO or the Planning Department archeologist. If the ERO determines that a

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

80 An “appropriate representative” of the descendant group is here defined to mean, in the case of Native Americans, any individual listed in the current Native American Contact List for the City and County of San Francisco maintained by the California Native American Heritage Commission and in the case of the Overseas Chinese, the Chinese Historical Society of America. An appropriate representative of other descendant groups should be determined in consultation with the Department archeologist.
significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

C) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or
D) A data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

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

- The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils-disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the risk these activities pose to potential archeological resources and to their depositional context;
- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;
- The archeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;
- The archeological monitor shall record and be authorized to collect soil samples and artifactual/eco factual material as warranted for analysis;
- If an intact archeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO.

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

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

The scope of the ADRP shall include the following elements:

- **Field Methods and Procedures.** Descriptions of proposed field strategies, procedures, and operations.

- **Cataloguing and Laboratory Analysis.** Description of selected cataloguing system and artifact analysis procedures.

- **Discard and Deaccession Policy.** Description of and rationale for field and post-field discard and deaccession policies.

- **Interpretive Program.** Consideration of an on-site/off-site public interpretive program during the course of the archeological data recovery program.

- **Security Measures.** Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities.

- **Final Report.** Description of proposed report format and distribution of results.

- **Curation.** Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

**Human Remains and Associated or Unassociated Funerary Objects.** The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner’s determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archeological consultant, project sponsor, ERO, and MLD shall have up to but not beyond six days of discovery to make all reasonable efforts to develop an agreement for the treatment of human remains and associated or unassociated funerary objects with appropriate dignity (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. Nothing in existing State regulations or in this mitigation measure compels the project sponsor and the ERO to accept recommendations of an MLD. The archeological consultant shall retain possession of any Native American human remains and associated or unassociated burial objects until completion of any scientific analyses of the human remains or objects as specified in the treatment agreement if such as agreement has been made or, otherwise, as determined by the archeological consultant and the ERO.
**Final Archeological Resources Report.** The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound, one unbound and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

**Mitigation Measure M-CR-3: Tribal Cultural Resources Interpretive Program**

If the ERO determines that a significant archeological resource is present, and if in consultation with the affiliated Native American tribal representatives, the ERO determines that the resource constitutes a tribal cultural resource (TCR) and that the resource could be adversely affected by the proposed project, the proposed project shall be redesigned so as to avoid any adverse effect on the significant tribal cultural resource, if feasible. If the Environmental Review Officer (ERO), if in consultation with the affiliated Native American tribal representatives and the Project Sponsor, determines that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option, the Project Sponsor shall implement an interpretive program of the TCR in consultation with affiliated tribal representatives. An interpretive plan produced in consultation with the ERO and affiliated tribal representatives, at a minimum, and approved by the ERO would be required to guide the interpretive program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, artifacts displays and interpretation, and educational panels or other informational displays.

**Mitigation Measure M-AQ-2: Construction Air Quality**

The project sponsor or the project sponsor’s Contractor shall comply with the following:
A. Engine Requirements.

1. All off-road equipment greater than 25 hp and operating for more than 20 total hours over the entire duration of construction activities shall have engines that meet or exceed either U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 2 off-road emission standards, and have been retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy. Equipment with engines meeting Tier 4 Interim or Tier 4 Final off-road emission standards automatically meet this requirement.

2. Where access to alternative sources of power are available, portable diesel engines shall be prohibited.

3. Diesel engines, whether for off-road or on-road equipment, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions). The Contractor shall post legible and visible signs in English, Spanish, and Chinese, in designated queuing areas and at the construction site to remind operators of the two-minute idling limit.

4. The Contractor shall instruct construction workers and equipment operators on the maintenance and tuning of construction equipment, and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications.

B. Waivers.

1. The Planning Department’s Environmental Review Officer (ERO) or designee may waive the alternative source of power requirement of Subsection (A)(2) if an alternative source of power is limited or infeasible at the project site. If the ERO grants the waiver, the Contractor must submit documentation that the equipment used for on-site power generation meets the requirements of Subsection (A)(1).

2. The ERO may waive the equipment requirements of Subsection (A)(1) if: a particular piece of off-road equipment with an ARB Level 3 VDECS is technically not feasible; the equipment would not produce desired emissions reduction due to expected operating modes; installation of the equipment would create a safety hazard or impaired visibility for the operator; or, there is a compelling emergency need to use off-road equipment that is not retrofitted with an ARB Level 3 VDECS. If the ERO grants the waiver, the Contractor must use the next cleanest piece of off-road equipment, according to the table below.

<table>
<thead>
<tr>
<th>Compliance Alternative</th>
<th>Engine Emission Standard</th>
<th>Emissions Control</th>
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Table – Off-Road Equipment Compliance Step-down Schedule
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<tr>
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<th>Tier 2</th>
<th>ARB Level 2 VDECS</th>
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<tr>
<td>2</td>
<td>Tier 2</td>
<td>ARB Level 1 VDECS</td>
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<tr>
<td>3</td>
<td>Tier 2</td>
<td>Alternative Fuel*</td>
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How to use the table: If the ERO determines that the equipment requirements cannot be met, then the project sponsor would need to meet Compliance Alternative 1. If the ERO determines that the Contractor cannot supply off-road equipment meeting Compliance Alternative 1, then the Contractor must meet Compliance Alternative 2. If the ERO determines that the Contractor cannot supply off-road equipment meeting Compliance Alternative 2, then the Contractor must meet Compliance Alternative 3. Alternative fuels are not a VDECS.

C. Construction Emissions Minimization Plan. Before starting on-site construction activities, the Contractor shall submit a Construction Emissions Minimization Plan (Plan) to the ERO for review and approval. The Plan shall state, in reasonable detail, how the Contractor will meet the requirements of Section A.

1. 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. The description 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, the description may include: 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, the description shall also specify the type of alternative fuel being used.

2. The ERO shall ensure that all applicable requirements of the Plan have been incorporated into the contract specifications. The Plan shall include a certification statement that the Contractor agrees to comply fully with the Plan.

3. The Contractor shall make the Plan available to the public for review on-site during working hours. The Contractor shall post at the construction site a legible and visible sign summarizing the Plan. The sign shall also state that the public may ask to inspect the Plan for the project at any time during working hours and shall explain how to request to inspect the Plan. The Contractor shall post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way.

D. Monitoring. After start of construction activities, the Contractor shall submit quarterly reports to the ERO documenting compliance with the Plan. After completion of construction activities and prior to receiving a final certificate of occupancy, the project sponsor shall submit to the ERO a final report
summarizing construction activities, including the start and end dates and duration of each construction phase, and the specific information required in the Plan.

G. PUBLIC NOTICE AND COMMENT

On March 20, 2017, the Planning Department mailed a Notification of Project Receiving Environmental Review to owners of properties within 300 feet of the project site, adjacent occupants, and neighborhood groups. Overall, concerns and issues raised by the public in response to the notice were taken into consideration and incorporated in the environmental review as appropriate.

The Planning Department received one letter expressing concerns over potential effects on traffic, loading, transit access, parking, and bike and pedestrian safety. A transportation study was prepared for the proposed project and any transportation-related impacts are addressed in Section E.4, Transportation (see Impacts TR-1 through TR-5, p. 34-41). In addition, the Planning Department received comments from nearby residents expressing concern regarding the height of the proposed project due to the potential impacts on their private views. As discussed in Section D, Summary of Environmental Effects, the proposed project qualifies as an urban infill project in a transit priority area under Senate Bill 743. For this reason, the aesthetic impacts of the proposed project are not considered in determining if the proposed project has the potential to result in significant environmental effects.

Comments related to topics outside the scope of CEQA were also received. These comments concerned socioeconomic issues including that there is no affordable housing nearby the project site for employees earning minimum wage to live, and that employees of the proposed hotel would need to drive to work requiring them to circulate neighborhood streets to search for parking. Environmental analysis under CEQA is required to focus on the direct and indirect physical changes to the environment that could reasonably result from a proposed project. Economic or social effects of a project are not considered significant environmental impacts, unless they lead to physical changes in the environment (CEQA Guidelines 15131). As discussed under the population and housing section of the MND, the project site does not contain any existing residential units and the proposed project would not result in any direct displacement of low-income residents. The possibility that the proposed project would contribute the lack of affordable housing is speculative with regard to potential physical changes that would result, and therefore is not a physical environmental effect subject to analysis under CEQA.

Additional comments received questioned the number of hotel rooms provided as part of the project (75 rooms). The commenter contends that the project should analyze the maximum number of hotel units that could fit on the property and at a level of 135 rooms. These are comments on the merits of the project and are not related to environmental analyses.
H. COMMENTS RECEIVED IN RESPONSE TO THE PMND

A “Notice of Availability of and Intent to Adopt a Mitigated Negative Declaration” was mailed on June 14, 2017, to owners of properties within 300 feet of the project site, adjacent occupants, and neighborhood groups. Members of the public provided comments to staff and requested to be included in future mailings or notices. Public comments received regarding physical environmental effects were related to (1) parking impacts; (2) comments regarding concerns on construction-related dust and air quality; and (3) comments expressing concerns over noise during the project’s construction period.

(1) As discussed in Section D, Summary of Environmental Effects, the proposed project qualifies as an urban infill project in a transit priority area under Senate Bill 743, as such, aesthetic and parking effects are no longer to be considered in determining if a project has the potential to result in significant environmental effects. For this reason, the project’s effects on parking are not considered in determining if the proposed project has the potential to result in significant environmental effects. (2) The project’s effects on air quality and construction-related dust have been addressed in Section 6, Air Quality (see Impact AQ-1, p. 55 and Impact AQ-2, p. 57). (3) The project’s construction-related noise impacts are addressed in Section E. 5, Noise (see Impact NO-3, p. 48).

Further, the project would be generally consistent with applicable zoning controls. Comments that do not pertain to physical environmental issues and comments regarding the merits of the project were not addressed and are more appropriately directed to the decisionmakers. The decision to approve or disapprove a project is independent of the environmental review process. While local concerns or other planning considerations may be grounds for modification or denial of the proposal, in the independent judgment of the department, there is no substantial evidence that the project could have a significant effect on the environment.
I. DETERMINATION

On the basis of this Initial Study:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.

Lisa Gibson
Environmental Review Officer
for
John Rahaim
Director of Planning

DATE 7/2/17
INITIAL STUDY PREPARERS
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San Francisco, CA 94103

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