



SAN FRANCISCO PLANNING DEPARTMENT

Community Plan Exemption Checklist

Case No.: **2014.0831E**
Project Address: **250 10th Street**
Zoning: Regional Commercial District (RCD)
WSoMa Mixed-Use General (WMUG) District
55/65-X Height & Bulk District
Block/Lot: 3517/034, 036, 037, 038
Lot Size: 59,020 square feet
Plan Area: Western SoMa Area Plan
Project Sponsor: Lee Drolet, Presidio Knolls School – 415-202-0770
Staff Contact: Jenny Delumo – (415) 575-9146, Jenny.Delumo@sfgov.org

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PROJECT DESCRIPTION

Project Overview

The approximately 59,020-square-foot (sq. ft.) project site is comprised of four adjacent lots: 240 10th Street (Lot 036), 250 10th Street (Lot 038), 260 10th Street (Lot 037), and 1415 Howard Street (Lot 034). The project site is developed with an approximately 36,510-gross-square-foot (gsf) preschool through third-grade school campus (i.e., Presidio Knolls School). The project sponsor proposes to alter the Presidio Knolls School campus in order to expand instruction to fourth- through eighth-grade students. The proposed project would demolish the elementary school building (Lot 038), preschool building (Lot 037), and garage (Lot 036); merge Lots 036, 037, and 038; construct two new school buildings; and make interior and exterior alterations to the rectory (Lot 034) and convert the space from group housing to educational uses. No interior or exterior alterations are proposed for the parish hall (Lot 037) which serves as a multi-purpose room. The proposed improvements would create an approximately 81,600-gsf school campus that could accommodate an additional 295 students (274 elementary and middle school students and 21 preschool students) and 45 faculty/staff, resulting in a maximum enrollment of 550 students supported by 117 faculty/staff.

Project Site

The subject lots form a roughly L-shaped project site located on the northeast corner of the block bounded by 10th Street to the northeast, Folsom Street to the southeast, Howard Street to the northwest, and 11th Street to the southwest. Kissling Street, which runs parallel to Howard and Folsom Streets, divides the western half of the subject block and dead ends at approximately the middle of the southwestern lot line of the project site. The project site is located in the South of Market (SoMa) neighborhood and within the Western SoMa Light Industrial and Residential Historic District (the Historic District). The project site is located within the St. Joseph's Church complex (the complex). The complex is comprised of St. Joseph's Church (constructed in 1913), rectory (constructed in 1908), parish hall (constructed in 1907), convent (constructed in 1961), school (constructed in 1960), and garage (constructed in 1960). The five structures comprising the Presidio Knolls School campus include:

- Presidio Knolls School elementary school building (formerly St. Joseph's Convent) – an approximately 5,485-gsf, 30-foot-tall, two-story building.

- Presidio Knolls School preschool building (formerly St. Joseph's School) – an approximately 8,935-gsf, 16-foot-tall, one-story building.
- St. Joseph's parish hall – an approximately 11,300-gsf, 50-foot tall, two-story building.
- St. Joseph's rectory – an approximately 9,300-gsf, 45-foot-tall, two-story-over basement building.
- St. Joseph's garage – an approximately 1,130-gsf, 12-foot-tall, single-story structure. The garage can accommodate two off-street parking spaces, but is currently used for storage.

St. Joseph's Church, located on the northeast corner of the subject block on Lot 035, is not a part of the Presidio Knolls School campus and is not a part of the project site.

Project Characteristics

The proposed project would demolish the elementary school building, preschool building, and garage, which total approximately 15,550-gsf of space; merge Lots 036, 037, and 038; and construct two new buildings:

- An approximately 48-foot-tall, 60,000-gsf, three-story school building. The building would be sited where the existing preschool and elementary school buildings are located. The new building would abut the eastern, southern and western lot lines of the southern half of the project site, enclosing a courtyard with a preschool play area.
- An approximately 19-foot-tall, 1,000-gsf, one-story music building. The building would be sited where the existing garage is located.

The vacant rectory, which was previously used for group housing, would be converted to educational uses. Interior alterations to the rectory would include seismic structural upgrades and interior reconfiguration to accommodate classrooms, a break room, administrative offices, and storage. Exterior alterations to the rectory would include removing non-historic windows on the east façade and replacing them with new windows that match existing historic windows, and lowering the sills of the existing window openings on the western façade of the building approximately 42 inches in order to create a new doorway and install two new doors. All alterations to the rectory would be consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. While the parish hall is part of the project site, there are no proposed interior or exterior alterations to the building under this project proposal. Alterations to the school campus would also include a new playground, new toddler yards, and a new curved concrete wall to create separation between portions of the campus.

The proposed project would provide space for new classrooms, including four toddler rooms, four preschool rooms, multi-purpose rooms, and language, science, art, and music rooms. A library, gymnasium, and administrative space would also be provided. Five Class I bicycle lockers (10 Class I bicycle parking spaces) would be installed along the south side of the parish hall, 20 Class II bicycle racks (40 Class II bicycle parking spaces) would be installed along the eastern side of the rectory, and two bicycle racks (four Class II bicycle parking spaces) would be installed on 10th Street near the main entrance, for a total of 54 bicycle parking spaces. The proposed project would also include excavation of approximately 1,050 cubic yards of material to a maximum depth of approximately three feet below grade. Student drop-off and pick-up areas would be located on 10th and Howard Streets.

The proposed project would be implemented in three phases:

- Phase 1 – Exterior and interior alterations to the rectory.

- Phase 2 – Partial demolition of the existing preschool building, full demolition of the elementary school building, and construction of the western portion of the new school building, including the playground.
- Phase 3 – Demolition of the remainder of the existing preschool building, construction of the remainder of the new school building, demolition of the existing garage, and construction of the new music building.

School operations continue during the construction phases. During Phase 2 students who currently use the classrooms in the elementary school building and the portion of the preschool building proposed for demolition during this construction phase would receive instruction in temporary classrooms located in the Parish Hall. During Phase 3 students who currently use the classrooms in the elementary school building and the portion of the preschool building proposed for demolition during this construction phase would receive instruction in the western portion of the new school building and in temporary classrooms in the Parish Hall.

Project Setting

The project site is within the Western SoMa Plan area. The irregularly shaped Plan area is comprised of two connected areas. Area 1 is roughly bounded by Minna Street to the north, Bryant Street to the south, Seventh Street to the east, and 13th Street to the west. Area 2 is roughly bounded by Harrison Street to the north, Townsend Street to the south, Fourth Street to the east, and Seventh Street to the west. Outlying parcels, roughly bounded by Folsom, Clementina, Fifth, and Fourth Streets, are also located in the Plan area. The project vicinity is characterized by a mix of commercial (auto repair shops, restaurants, bars, storage facilities), residential, and institutional uses. The portions of the blocks that abut 10th Street, including the eastern half of the subject block, are zoned RCD (Regional Commercial). The northwestern corner of the subject block and a small portion of the southern perimeter of the subject block are zoned WMUG (WSoMa Mixed Use-General). RED (South of Market Residential Enclave), RED-MX (Residential Enclave-Mixed), and WMUO (WSoMa Mixed Use-Office) zoning districts are all located on portions of the subject block and throughout the project vicinity. The density of development in the project vicinity is primarily comprised of low- and mid-rise buildings. On the subject block, a three-story self-storage facility fronts Folsom and 10th Streets (southeast corner), a three-story apartment building fronts Folsom Street at the mid-block, a one-story auto repair fronts 11th and Folsom Streets (southwest corner), a three-story building housing a community service organization and a three-story building with a restaurant on the ground floor front 11th Street at the mid-block, and a one-story building housing Production, Distribution, and Repair (PDR) and retail uses fronts Howard and 11th Streets (northwest corner). One- and two-story-over-basement houses front Kissling Street.

As previously discussed, the subject block is bounded by 10th, Folsom, 11th, and Howard Streets, and intersected by Kissling Street. 10th Street is a southbound four-lane, one-way street with a bike lane on the west side of the street and parking on both sides of the street. Howard Street is a westbound, three-lane, one-way street with a bike lane on the south side of the street and parking on both sides of the street. Along the subject block, the far left lane is left turn only. Eleventh Street is northbound three-lane, two-way street with a bike lane on the west side of the street and parking on both sides of the street. Two lanes travel southbound and one lane travels northbound. Folsom Street is an eastbound three-lane, one-way street with a bike lane on the south side of the street and parking on both sides of the street. Kissling Street is an undivided, two-way mid-block alley with one travel lane and parking on the east side of the street.

Figure 1 – Project Site Location

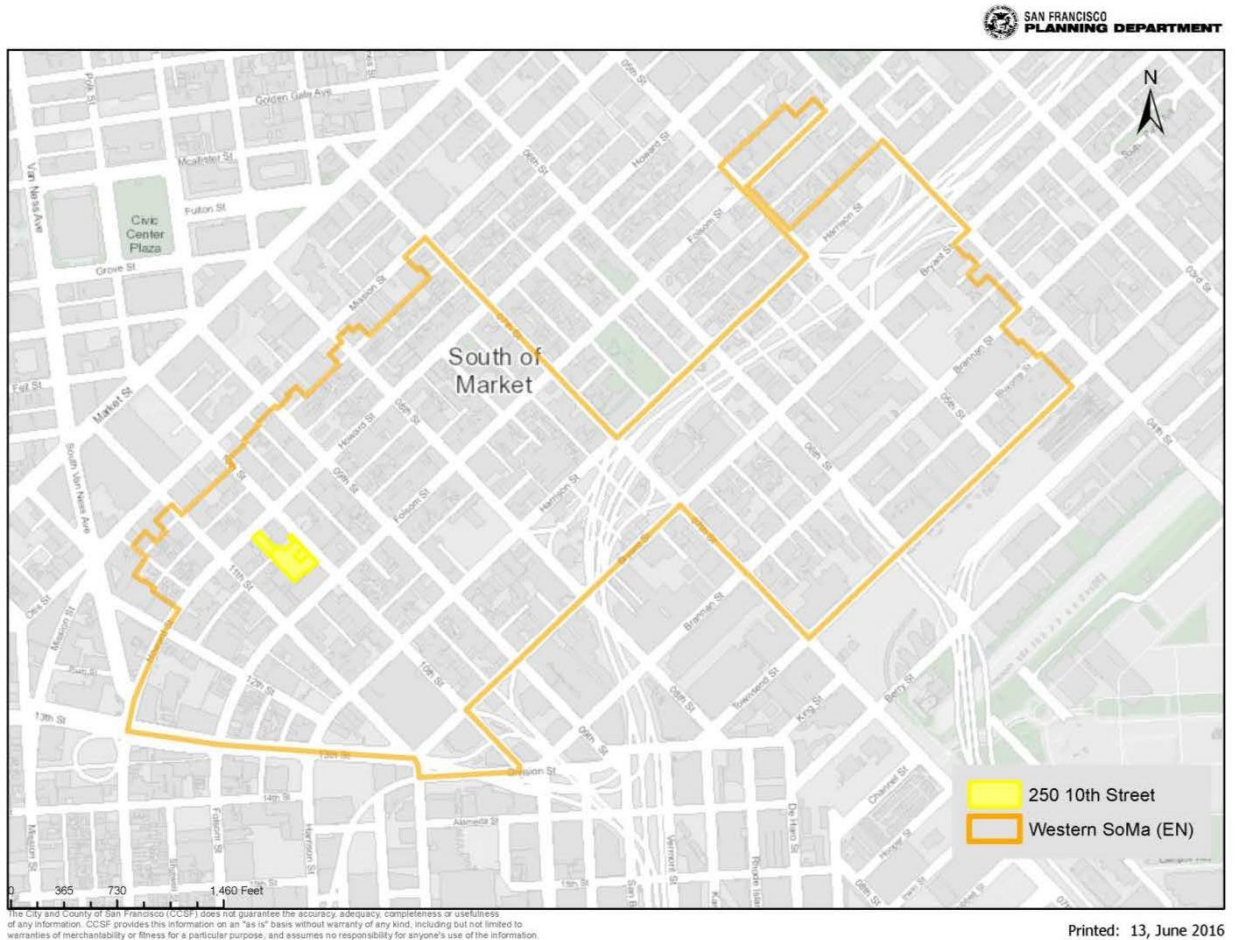
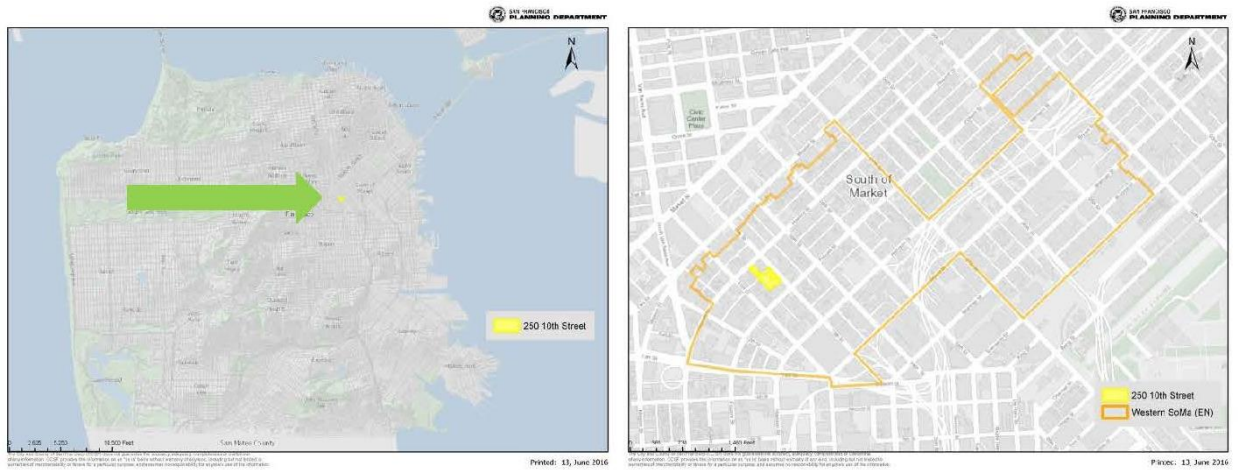


Figure 2 – Existing Site Plan

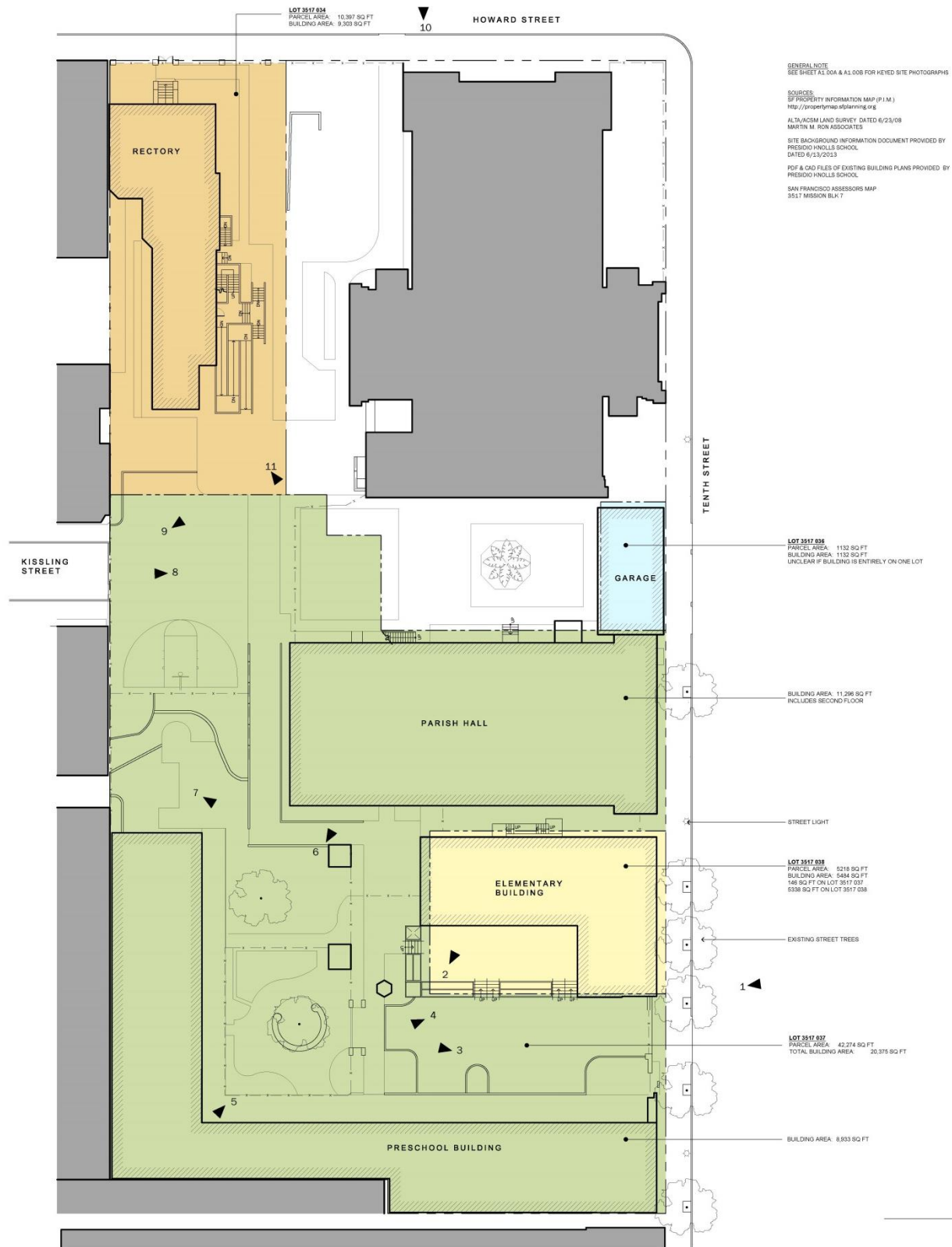


Figure 3 – Proposed Project Site Plan

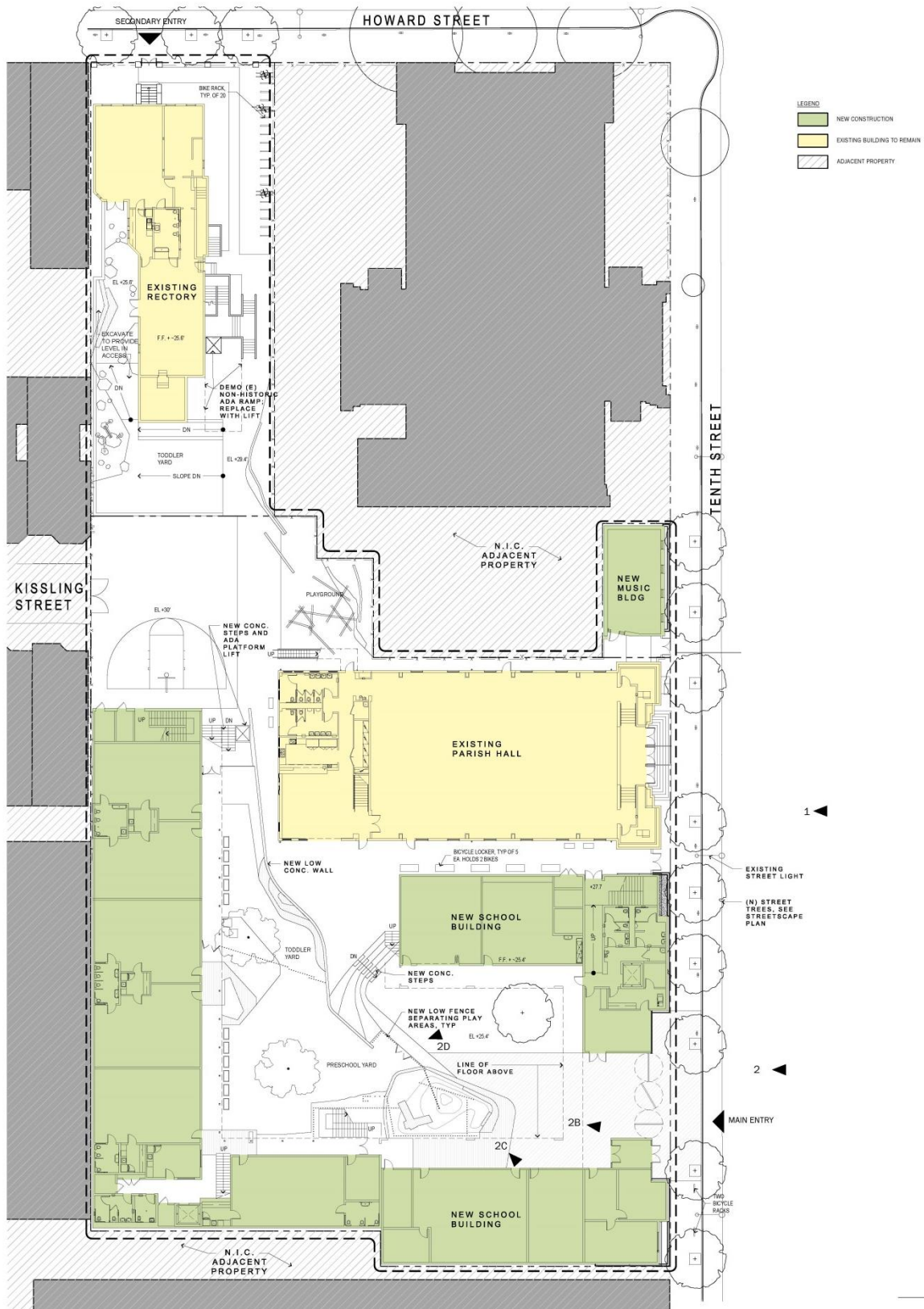


Figure 4 – Proposed Landscape/Streetscape Site Plan



Figure 5 – Proposed First Floor

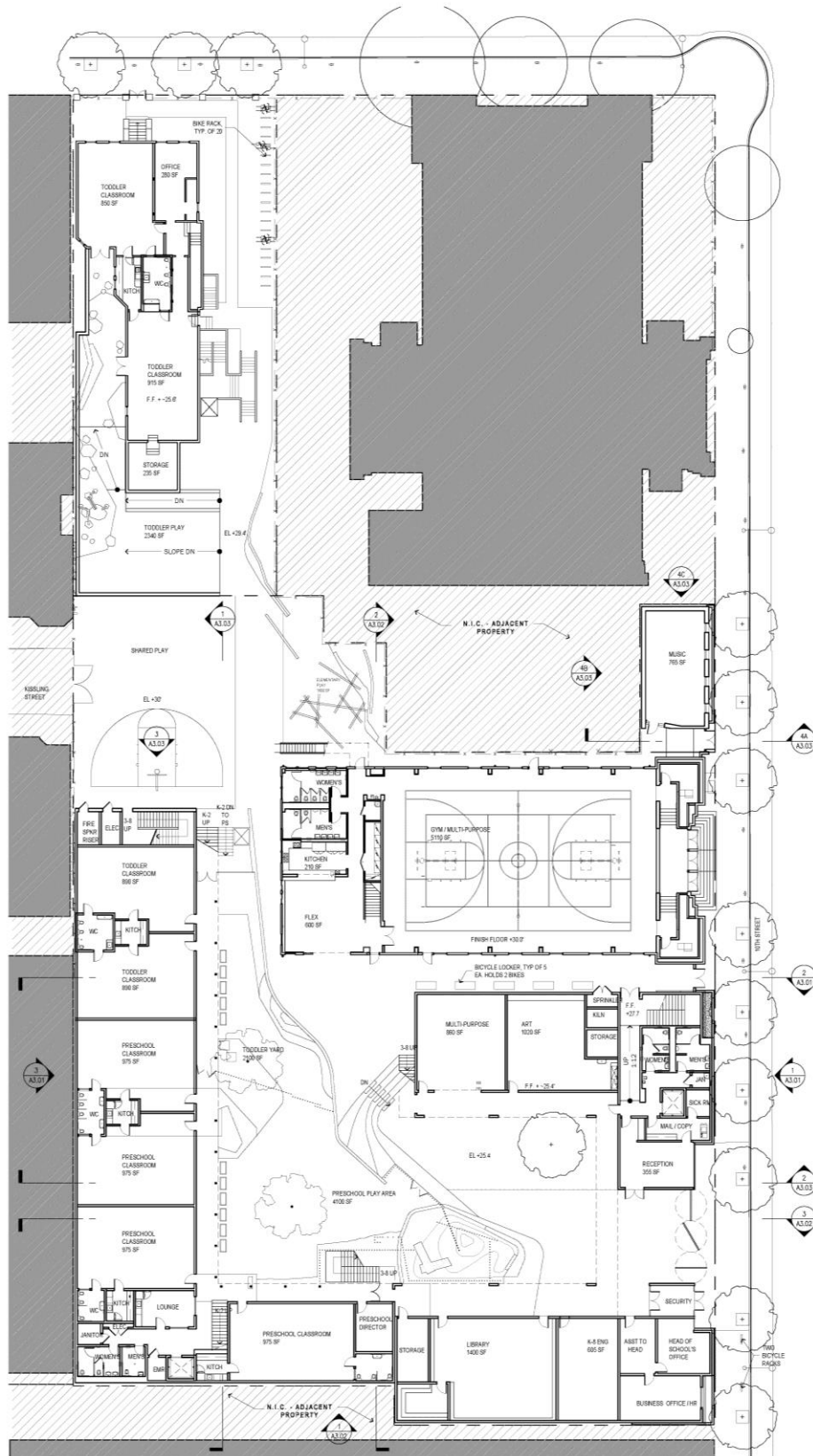


Figure 6 – Proposed Second Floor



Figure 7 – Proposed Third Floor

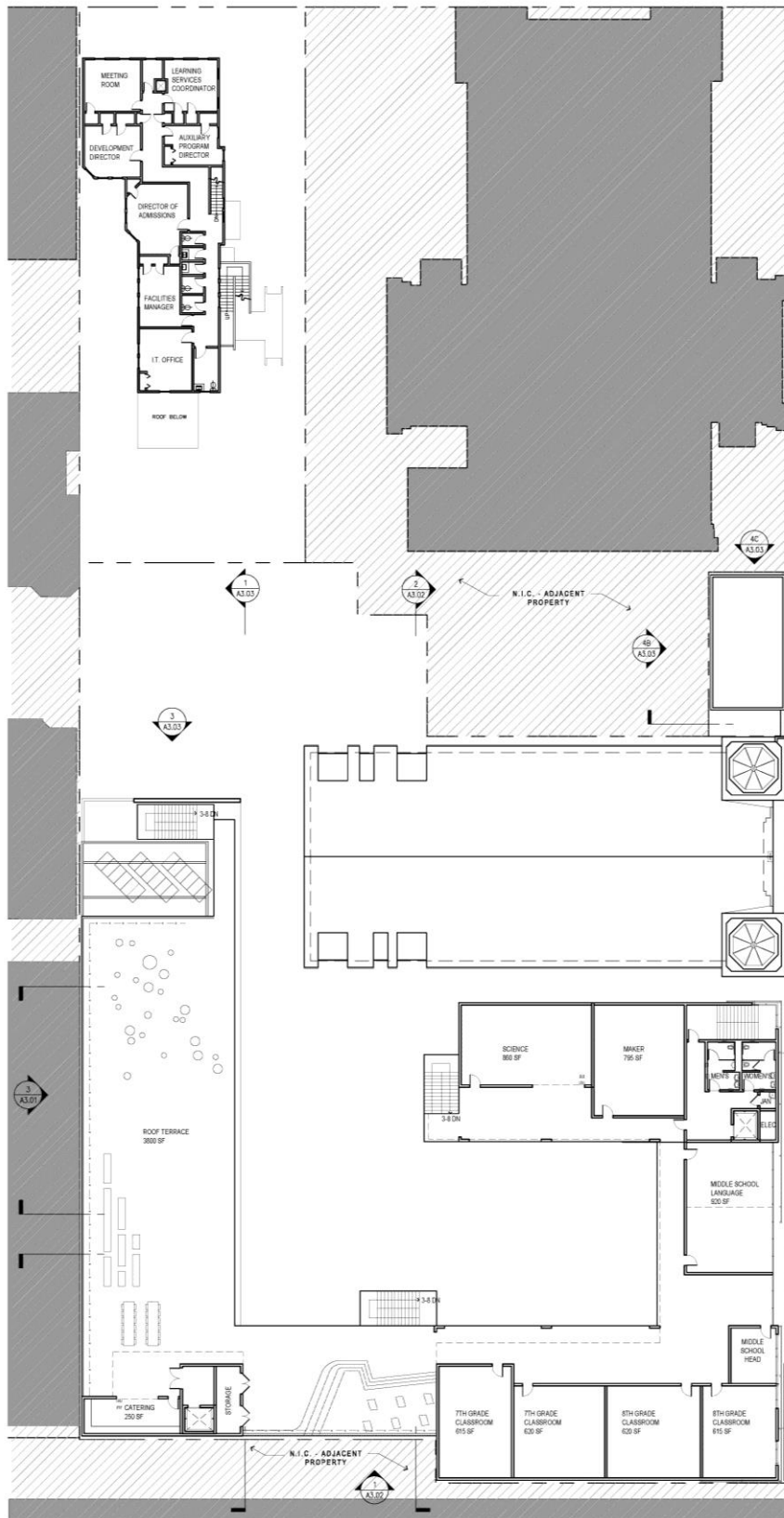


Figure 8 – Proposed Roof Plan

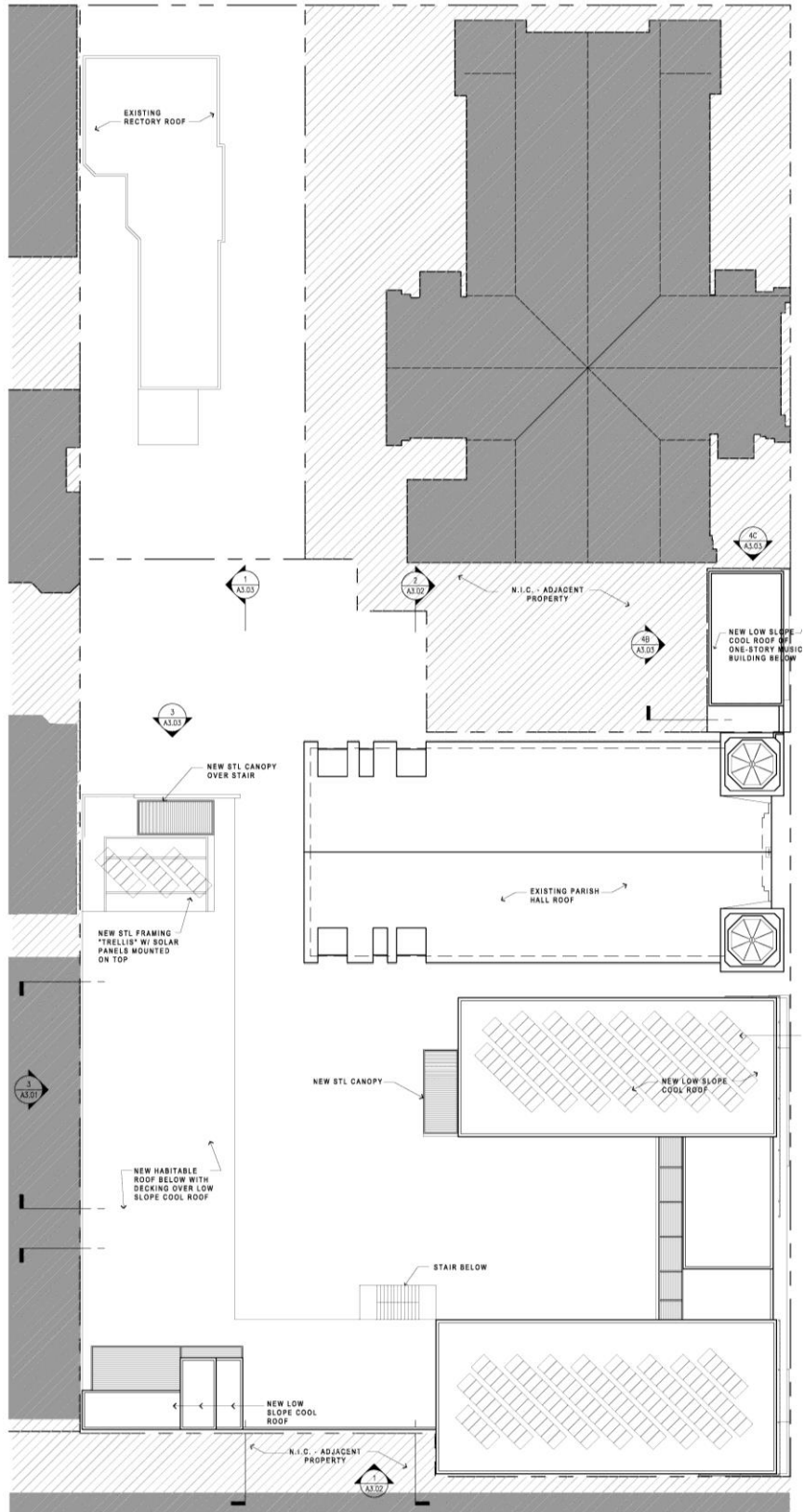


Figure 10 – Proposed Courtyard Elevations and Sections (facing north and west)

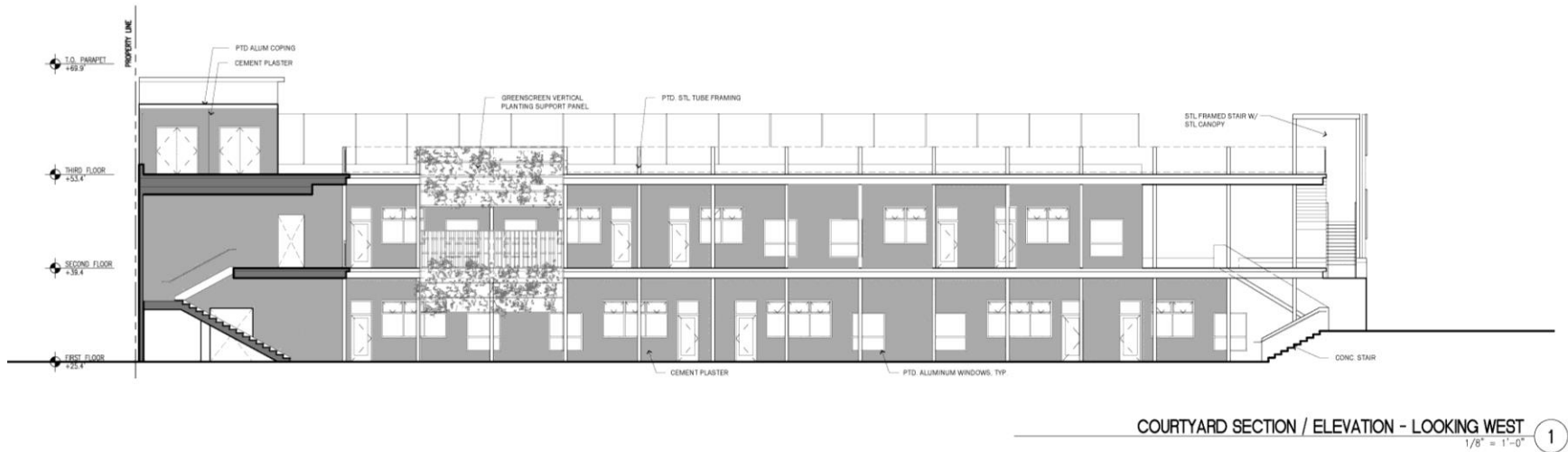
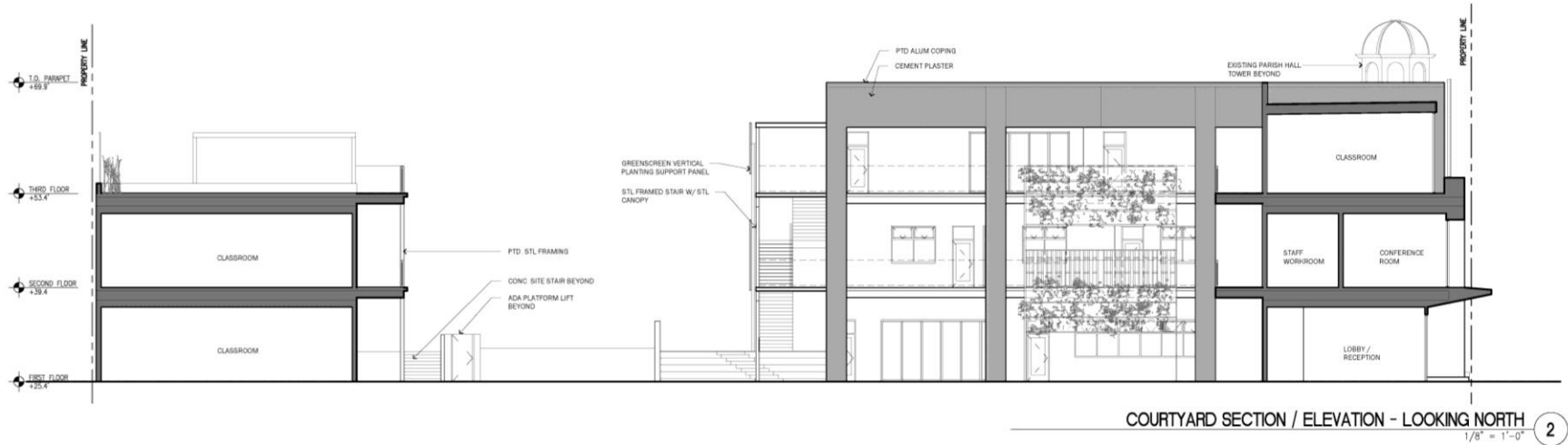


Figure 11 – Proposed Courtyard Elevations and Sections (facing south and east)

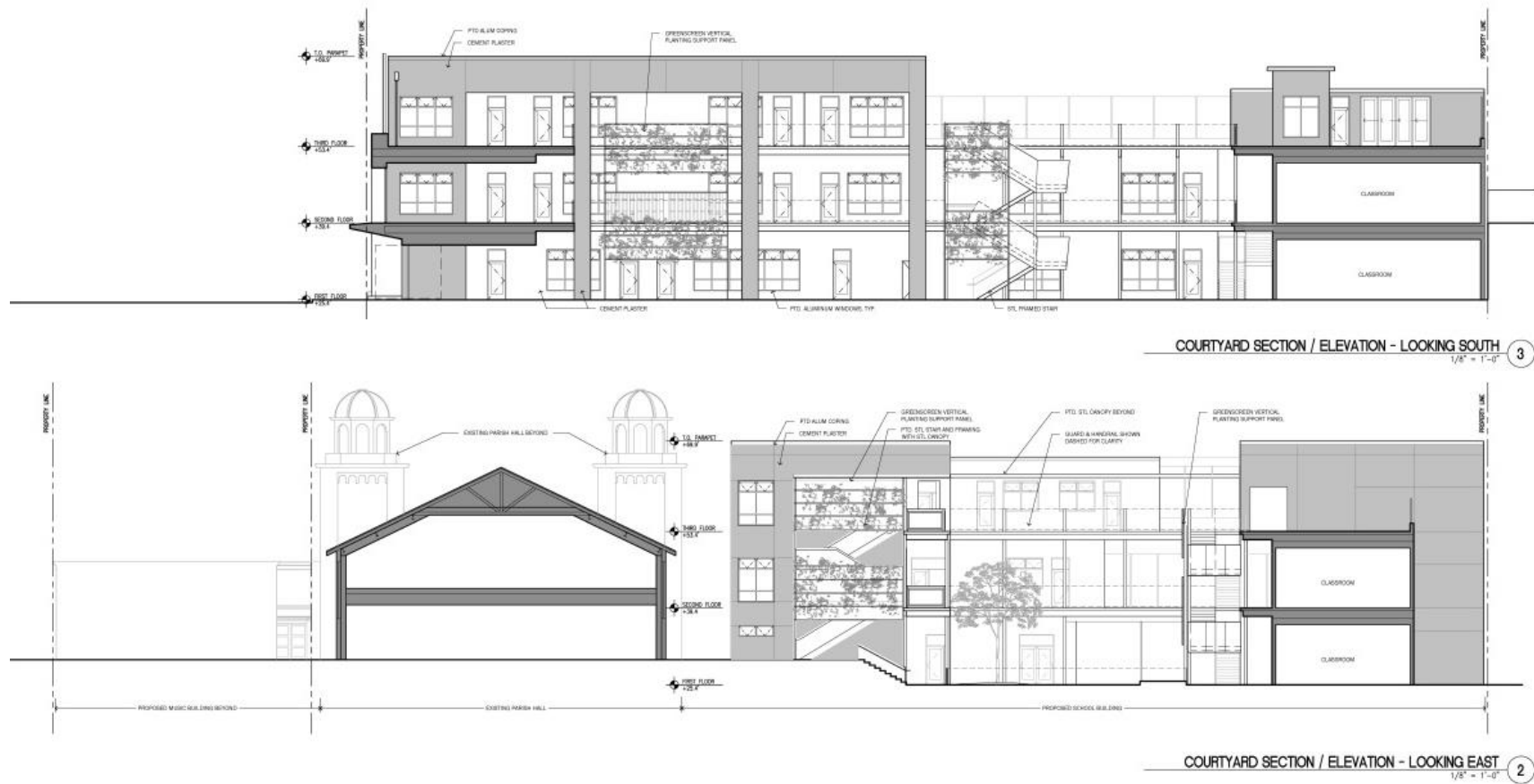
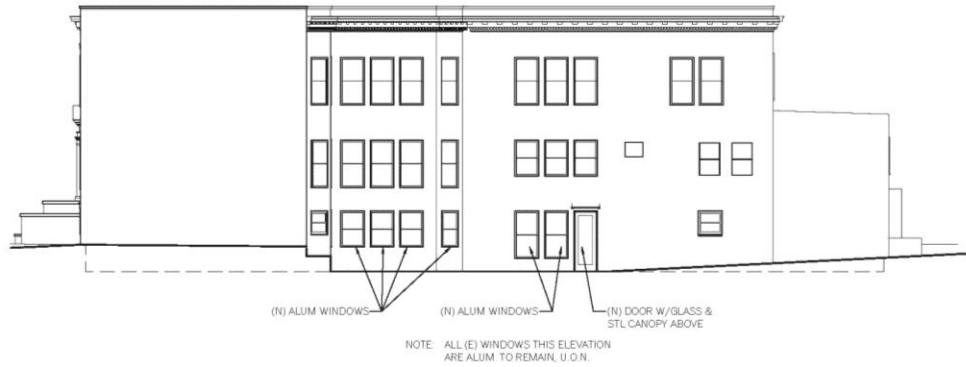
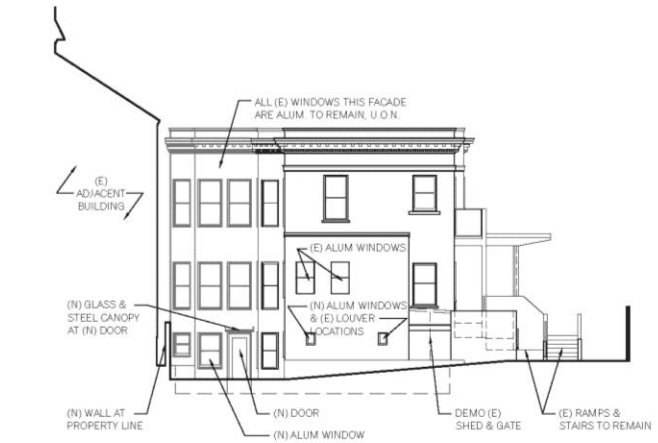


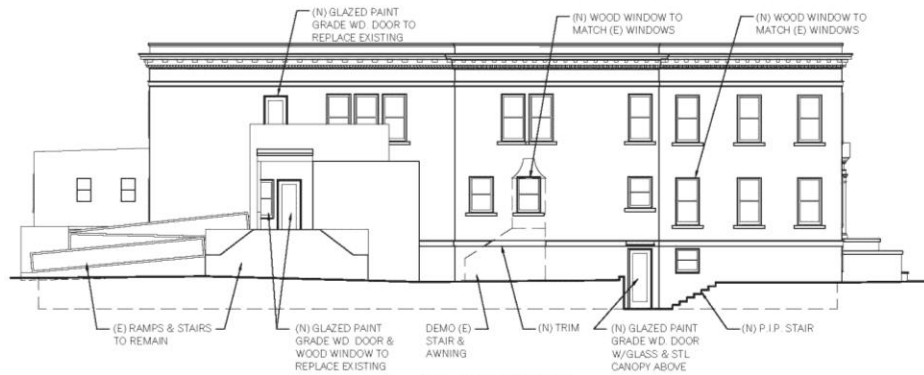
Figure 12 – Proposed Rectory Elevations



4. WEST ELEVATION



3. SOUTH ELEVATION

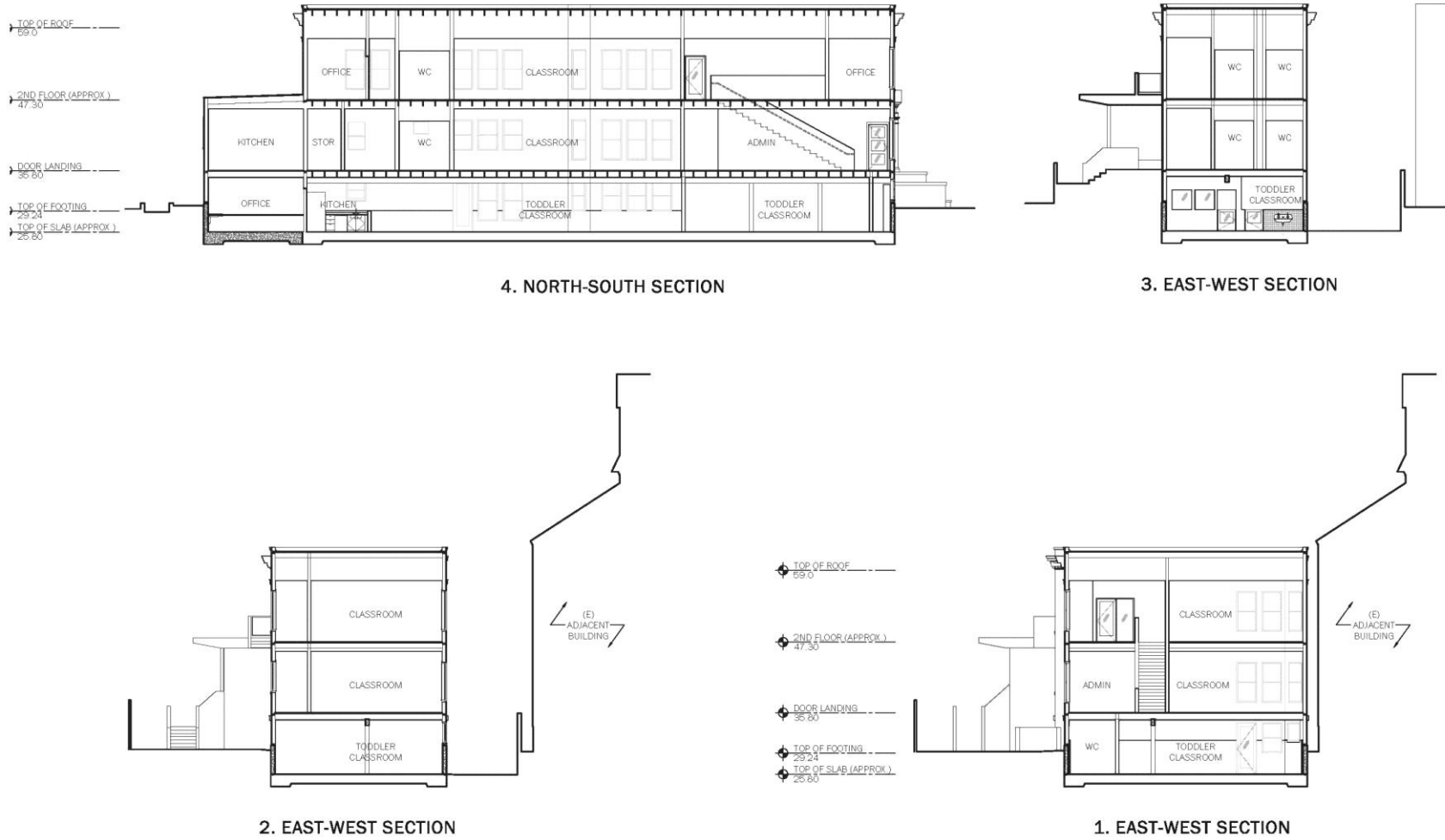


2. EAST ELEVATION



1. NORTH ELEVATION

Figure 13 – Proposed Rectory Sections



PROJECT APPROVAL

The proposed 250 10th Street project would require the following approvals:

Actions by the Planning Commission

The proposed project would require a Conditional Use Authorization (CUA) and a Planned Unit Development (PUD) from the Planning Commission pursuant to Planning Code Sections 303 and 304. The proposed project requires the CUA for (1) the development of a lot larger than 10,000 square feet in an RCD District pursuant to Planning Code Section 121.1; (2) merging lots in an RCD District with a lot frontage greater than 100 feet pursuant to Planning Code Section 121.7; (3) removal of ten group housing units pursuant to Planning Code Section 317; (4) establishing a child care facility (a preschool with more than 13 children) in an RCD District pursuant to Planning Code Section 744.82a; and (5) establishment of a non-residential use (school and child care) larger than 10,000 square feet in the RCD & WMUG Zoning Districts, pursuant to Planning Code Section 121.2. The project is seeking exceptions to the code for:

- **Rear Yard** (Planning Code Section 134)
- **Street Frontage** (Planning Code Section 145.1)
- **Bicycle Parking, Shower and Locker Facilities** (Planning Code Sections 155.2 and 155.4)

Actions by other City Departments

- **Department of Building Inspection (DBI)**. Approval of demolition, grading, building and occupancy permits for demolition of the existing structures and new construction.
- **Department of Public Health (DPH)**. Approval of a Site Mitigation Plan pursuant to the Maher Ordinance prior to the commencement of any excavation work, and approval of a Soil Mitigation Plan and Dust Control Plan prior to construction-period activities.
- **San Francisco Municipal Transportation Agency (SFMTA)**. Approval of all proposed changes in curb cuts and loading zones pursuant to the SFMTA Color Curb Program. Coordination with the SFMTA Interdepartmental Staff Committee on Traffic and Transportation to coordinate temporary construction-related changes to the transportation network.
- **San Francisco Public Works (Public Works)**. Approval of a lot merger, and modifications to public sidewalks, street trees, curb cuts.
- **San Francisco Public Utilities Commission (SFPUC)**. Approval of a stormwater control plan and an erosion and sediment control plan prior to commencing construction.

The Conditional Use Authorization would be the Approval Action for the project. The Approval Action date establishes the start of the 30-day appeal period for this CEQA exemption determination pursuant to Section 31.04(h) of the San Francisco Administration Code.

EVALUATION OF ENVIRONMENTAL EFFECTS

This Community Plan Exemption (CPE) Checklist evaluates whether the environmental impacts of the proposed project are addressed in the Programmatic Environmental Impact Report for the Western SoMa

Community Plan, Rezoning of Adjacent Parcels, and 350 Eighth Street Project (Western SoMa PEIR).¹ The CPE Checklist indicates whether the proposed project would result in significant impacts that: (1) are peculiar to the project or project site; (2) were not identified as significant project-level, cumulative, or off-site effects in the PEIR; or (3) are previously identified significant effects, which as a result of substantial new information that was not known at the time that the Western SoMa PEIR was certified, are determined to have a more severe adverse impact than discussed in the PEIR. Such impacts, if any, will be evaluated in a project-specific Mitigated Negative Declaration or Environmental Impact Report. If no such topics are identified, the proposed project is exempt from further environmental review in accordance with Public Resources Code Section 21083.3 and CEQA Guidelines Section 15183.

Mitigation measures identified in the PEIR are discussed under each topic area, and measures that are applicable to the proposed project are described in the Mitigation Monitoring and Reporting Plan (MMRP) that is attached to the CPE Certificate.

The Western SoMa PEIR identified significant impacts related to cultural and paleontological resources, transportation and circulation, wind and shadow, noise and vibration, air quality, biological resources, and hazards and hazardous materials. Additionally, the PEIR identified significant cumulative impacts related to cultural and paleontological resources, transportation and circulation, shadow, noise, and air quality. Mitigation measures were identified for the above impacts—aside from shadow—and reduced said impacts to less-than-significant except for those related to transportation (program-level and cumulative traffic impacts at three intersections; and cumulative transit impacts on several San Francisco Municipal Railway (Muni) lines), cultural and paleontological resources (program-level and cumulative impacts from demolition of historic resources), noise (cumulative noise impacts), and air quality (program-level toxic air contaminants (TACs) and fine particulate matter (PM_{2.5}) pollutant impacts, program-level and cumulative criteria air pollutant impacts).

The proposed project would include demolition of the existing elementary, preschool, and garage buildings, construction of an approximately 60,000-gsf school building and an approximately 1,000-gsf music building, and interior and exterior alterations to the rectory building. As discussed below in this Checklist, the proposed project would not result in new, significant environmental effects, or effects of greater severity than were already analyzed and disclosed in the Western SoMa PEIR.

SENATE BILL 743

AESTHETICS AND PARKING

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

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

¹ San Francisco Planning Department, *Western SoMa Community Plan, Rezoning of Adjacent Parcels, and 350 Eighth Street Project Final Environmental Impact Report (FEIR)*, Planning Department Case Nos. 2008.0877E and 2007.1035E. This document is available for review at 1650 Mission Street, Suite 400, as part of Case Nos. 2008.0877E and 2007.1035E.

The proposed project does not meet the third criterion above because it is not a residential, mixed-use, or employment center² project. Thus, this CPE Checklist considers aesthetics and parking in determining the significance of project impacts under CEQA. Project elevations are included in the project description.

Automobile Delay and Vehicle Miles Traveled

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

In January 2016, OPR published for public review and comment a [Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA](#)³ recommending that transportation impacts for projects be measured using a vehicle miles traveled (VMT) metric. On March 3, 2016, in anticipation of the future certification of the revised CEQA Guidelines, the San Francisco Planning Commission adopted OPR’s recommendation to use the VMT metric instead of automobile delay to evaluate the transportation impacts of projects (Resolution 19579). (Note: the VMT metric does not apply to the analysis of project impacts on non-automobile modes of travel such as riding transit, walking, and bicycling.) Therefore, impacts and mitigation measures from the Western SoMa PEIR associated with automobile delay are not discussed in this checklist, including M-TR-1c: Optimization of Signal Timing in the Eight/Harrison/I-80 Westbound off-Ramp Intersection and M-TR-4: Provision of New Loading Spaces on Folsom Street. Instead, a VMT analysis is provided in Checklist topic 4, Transportation.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
1. LAND USE AND LAND USE PLANNING—Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial impact upon the existing character of the vicinity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

² Employment center project is defined as a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area.

³ California Office of Planning and Research, *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, January 2016. Available at https://www.opr.ca.gov/s_sb743.php, accessed March 8, 2016.

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

The Western SoMa PEIR determined that implementation of the Plan and Rezoning of Adjacent Parcels would not create any new physical barriers in the Plan area because the Plan does not provide for any new major roadways, such as freeways, that would divide the project area or isolate individual neighborhoods within it. The Western SoMa PEIR also concluded that implementation of the Plan would not result in substantial changes to the existing character of the vicinity.

The Western SoMa PEIR determined that implementation of the Plan would result in less-than-significant displacement impacts. The project would not result in any displacement impacts not previously identified in the Western SoMa PEIR. The project site is currently developed with a school campus and would not displace any existing residential units.

The Citywide Planning and Current Planning Divisions of the Planning Department determined that the proposed project would be permitted with the approval of a Conditional Use Authorization as a Planned Unit Development in the in the RCD and WMUG Districts, and is consistent with the bulk, density, and lands uses as envisioned in the Western SoMa Plans.^{4,5}

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

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
2. AESTHETICS—Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment which contribute to a scenic public setting?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

⁴ Adam Varat, San Francisco Planning Department, Community Plan Exemption Eligibility Determination, Citywide Planning and Policy Analysis, 250 10th Street, June 27, 2016. This document (and all other documents cited in this report, unless otherwise noted), is available for review at 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case No. 2014.0831E.

⁵ Jeff Joslin, San Francisco Planning Department, Community Plan Exemption Eligibility Determination, Current Planning Analysis, 510-520 Townsend Street, June 6, 2016.

The Western SoMa Community Plan PEIR determined that implementation of the Plan and Rezoning of Adjacent Parcels would not have a substantial adverse effect on a scenic vista, substantially damage scenic resources that contribute to a scenic public setting, substantially degrade the visual character or quality of the area, or create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties. No mitigation measures were identified in the FEIR.

The project site and vicinity are surrounded by uses typical in an urban setting. The site vicinity is primarily comprised of low- and mid-rise buildings of one to six stories, accommodating a mix of commercial, residential, and PDR uses. Public viewpoints in the site vicinity are dominated by existing buildings and St. Joseph's Church. The Western SoMa PEIR determined that while St. Joseph's Church is a notable historic resource, it does not constitute a visual or scenic resource. Therefore, no scenic vistas or scenic resources exist in the project vicinity.

The project site is located within the St. Joseph's Church complex, and as such is adjacent to St. Joseph's Church. Two of the existing buildings on the project site, the rectory and the parish hall, are also historic resources. The proposed project would include the demolition of three structures (the elementary school building, preschool building, and garage) and the construction of an approximately 60,000-gsf, 48-foot-tall school building) and an approximately 1,000-gsf, 19-foot-tall music building. Interior and exterior renovation of the rectory is also proposed. The proposed renovation of the rectory would be undertaken in accordance with the Secretary of Interior's Standards for the Treatment of Historic Properties, and the proposed school building and music building and renovations would be subject to the Planning Department's Design Guidelines. The PEIR found that adherence to the Design Guidelines would minimize the impact of Plan-generated development on the Plan area, including visually distinct buildings such as St. Joseph's Church. Therefore, the proposed project would not substantially degrade the visual character or quality of the area.

While the proposed buildings would not be substantially taller than most of the surrounding development in the site vicinity and would abut industrial buildings without windows on the facades facing the school campus, they would be visible from some residential and commercial buildings within the project site vicinity. However, should the proposed project result in reduced private views on private property it would be an unavoidable consequence of the proposed project and would be an undesirable change for those individuals affected. Nonetheless, the change in views would not exceed that commonly encountered in an urban setting, and the loss of those private views would not constitute a significant impact under CEQA. In addition, the proposed project would not obstruct long-range views from a publically-accessible area. Therefore, the proposed project would not substantially alter public views.

The proposed buildings would introduce a new source of light and glare. However, the proposed project would be subject to and would comply with the City's Green Building Code,⁶ which requires all newly constructed non-residential buildings to design interior and exterior lighting such that zero direct-beam illumination leaves the building site, except for emergency lighting and lighting required for nighttime activity. In addition, the proposed project would be subject to and would comply with Planning Code Section 139, which establishes guidelines aimed at limiting glare from proposed buildings and the City's Standards for Bird-Safe Buildings requires that new structures do not create a substantial source of glare.

⁶ Building Code, 2010 Edition, Section 13.C.5.106.8

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

Topics:	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
3. POPULATION AND HOUSING— Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

The proposed project would be expected to add an estimated additional 295 students and 45 faculty/staff to the project site, for a total of approximately 550 students and 117 faculty/staff. School operations continue during the construction phases. During construction Phase 2 students who currently use the classrooms in the elementary school building and the portion of the preschool building proposed for demolition during this construction phase would receive instruction in temporary classrooms located in the Parish Hall. During construction Phase 3 students who currently use the classrooms in the elementary school building and the portion of the preschool building proposed for demolition during this construction phase would receive instruction in the western portion of the new school building and in temporary classrooms in the Parish Hall.

Although the project would not directly affect population and housing through the construction of new residential units, the incremental increase in school capacity and employment resulting from the project could contribute indirectly to the demand for housing and related services in the project area. This indirect effect on population and housing is within the scope of the population growth anticipated under the Western SoMa Community Plan, and evaluated in the Western SoMa PEIR.

For these reasons, the proposed project would not result in significant impacts on population and housing that were not identified in the Western SoMa PEIR.

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

Historic Architectural Resources

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

The existing buildings on the project site are located within the boundaries of the Western SoMa Light Industrial and Residential Historic District (the Historic District), and were evaluated in the adopted South of Market Historic Resource Survey.⁷ Through the survey, the rectory (constructed in 1908) and the parish hall (constructed in 1907) were given a California Historic Resource Status Code (CHRSC) of “1S”. This defines each property as an “individual property listed in the NR [National Register] by the Keeper. Listed in the CR [California Register]”. The elementary school building, preschool building, and garage were assigned a CHRSC of “6Z”. This defines the properties as “found ineligible for NR, CR or local designation through survey evaluation”. Thus, the elementary school building, preschool building, and garage are not considered historic resources for the purpose of CEQA review. A qualified historic resources consultant was retained to prepare a Historic Resource Evaluation (HRE) of the proposed project.⁸ The Planning Department reviewed the HRE and provided a historic resource determination in a Preservation Team Review Form.⁹ The findings from the HRER and historic resource determination are summarized below.

⁷ San Francisco Planning Department, *South of Market Historic Resource Survey Map*. Available at <http://www.sf-planning.org/index.aspx?page=2491>, accessed August 31, 2015.

⁸ Page & Turnbull, *Presidio Knolls School, 260 10th Street, Historic Resource Evaluation Part 2*, August 31, 2015.

⁹ San Francisco Planning Department, *Preservation Team Review Form, 250 10th Street*, June 16, 2016.

The proposed project would demolish the preschool building and elementary school building, construct an approximately 60,000-gsf school building and an approximately 1,000-gsf music building, and alter the interior and exterior of the rectory. Interior alterations to the rectory would consist of seismic structural upgrades and interior reconfiguration to accommodate classrooms, a break room, administrative offices, and storage. Exterior alterations would consist of removing non-historic windows on the east façade and replacing them with new windows that match existing historic windows, and lowering the sills of the existing window openings on the western façade of the building approximately 42 inches in order to create a new doorway and install two new doors. No alterations are proposed for the parish hall as part of this project.

The proposed alterations to the rectory were evaluated using the criteria set forth by the Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (the Standards). The Standards outline four categories of evaluation criteria (Preservation standards, Rehabilitation standards, Restoration standards, and Reconstruction standards). The Secretary of the Interior's Standards for Rehabilitation were determined to be most applicable to the appraisal of the proposed alterations to the rectory, specifically standards 1-10. The consultant's report found that the proposed alterations to the rectory would achieve compliance with standards 1-10 of the Secretary of the Interior's Standards for Rehabilitation. In addition, the report concluded that the proposed project would respect the historic buildings of the St. Joseph's Church complex, and the complex would not be affected by the proposed project to the extent that it loses integrity or become ineligible for listing in the National Register, and would be compatible with the Historic District.

The Planning Department concurs with the findings in the consultant's report, and has determined that the proposed project would not result in a substantial adverse impact on a historic resource and would be consistent with the Secretary of Interior's Standards for Rehabilitation.

The proposed project would not include the demolition of a historic resource, nor would the proposed alterations to the rectory result in a significant adverse effect on a historic resource. Therefore, the proposed project would not contribute to the significant and unavoidable impacts on historic resources identified in the Western SoMa PEIR, and Western SoMa PEIR Mitigation Measures M-CP-1a: Documentation of a Historical Resource, M-CP-1b: Oral Histories, and M-CP-1c: Interpretive Program would not apply to the proposed project.

Western SoMa PEIR Mitigation Measures M-CP-7a: Protect Historical Resources from Adjacent Construction Activities and M-CP-7b: Construction Monitoring Program for Historical Resources were identified to reduce construction-related impacts on historic resources to less-than-significant levels. PEIR Mitigation Measures M-CP-7a is required when use of heavy equipment is to occur within 25 feet of a historic building and PEIR Mitigation Measure M-CP-7b is required when any construction is to occur within 25 feet a historic building. The proposed project would include new construction within 25 feet of historic resources (the parish hall, rectory, and St. Joseph's Church) and would involve the use of heavy equipment. Therefore, PEIR Mitigation Measures M-CP-7a and M-CP-7b would apply to the proposed project. The project sponsor has agreed to implement these measures as **Project Mitigation Measures 1 and 2** (see Mitigation Measures section below for full text).

Based on the above, the proposed project would not result in significant impacts on historic architectural resources beyond those identified in the Western SoMa PEIR.

Archeological Resources

The Western SoMa PEIR determined that implementation of the Community Plan could result in significant impacts on archeological resources and identified two mitigation measures that would reduce these potential impacts to a less than-significant-level. Western SoMa PEIR Mitigation Measure M-CP-4a Project-Specific Preliminary Archeological Assessment applies to projects involving soil-improving activities including excavation to a depth of five or more feet below grade. PEIR Mitigation Measure M-CP-4b Procedures for Accidental Discovery of Archeological Resources applies to all soil-disturbing activities.

The proposed project at 250 10th Street would involve up to three feet of soil disturbance to construct the foundations for the new buildings and level the grade near the proposed western entrance to the rectory. Therefore, PEIR Mitigation Measure M-CP-4b applies to the proposed project. The Planning Department’s archeologist conducted a Preliminary Archeology Review (PAR) of the project site and the proposed project. Based on the PAR, the Planning Department determined that standard Archeological Mitigation Measure I (Accidental Discovery) would apply to the proposed project.¹⁰ The PAR and mitigation requirements are consistent with Mitigation Measure M-CP-4b of the Western SoMa PEIR, the implementation of which would reduce potential impacts from accidental discovery of buried archeological resources during project construction to a less-than-significant level. The project sponsor has agreed to implement Mitigation Measure M-CP-4b, including the requirements of the Planning Department’s first standard Archeological Mitigation Measure, as **Project Mitigation Measure 3** (full text provided in the Mitigation Measures section below).

The Western SoMa PEIR also noted that the potential disturbance of human remains is governed by state laws and regulations, and compliance with these laws and regulations would avoid any potentially significant impacts related to such disturbance in the Plan area.

For the above reasons, the proposed project would not result in significant impacts on cultural or archeological resources beyond those identified in the Western SoMa PEIR.

Topics:	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
5. TRANSPORTATION AND CIRCULATION—Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

¹⁰ San Francisco Planning Department, *Preliminary Archeological Review (PAR) for 250 10th Street*, April 23, 2015.

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels, obstructions to flight, or a change in location, that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Western SoMa PEIR anticipated that growth resulting from the zoning changes would not result in significant impacts related to pedestrians, bicyclists, emergency access, or construction. Transportation system improvements included as part of the Western SoMa Community Plan were identified to have significant impacts related to loading, but the impact was reduced to less-than-significant with mitigation. Accordingly, consistent with the Western SoMa PEIR, the proposed project would not conflict with any applicable transportation plans, ordinances, policies, or programs.

The Western SoMa PEIR anticipated that adoption of the Plan could result in significant impacts on traffic, transit, and loading, and identified four transportation mitigation measures. One mitigation measure reduced loading impacts to less-than-significant. Even with mitigation, however, it was anticipated that the significant adverse traffic impacts and the cumulative impacts on transit lines could not be fully mitigated. Thus, these impacts were found to be significant and unavoidable.

To examine the potential for significant new impacts that were not identified in the Western SoMa PEIR or the potential for more severe transportation impacts associated with the proposed project, a Transportation Circulation Memorandum was prepared for the proposed project.¹¹ The results of this study are summarized below.

As discussed above under "Senate Bill 743", in response to state legislation that called for removing automobile delay from CEQA analysis, the Planning Commission adopted resolution 19579 replacing automobile delay with a VMT metric for analyzing transportation impacts of a project. Therefore, impacts and mitigation measures from the Western SoMa PEIR associated with automobile delay are not discussed in this checklist.

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

¹¹ CHS Consulting Group, 250 Tenth Street (Presidio Knolls School) Transportation Memorandum, May 5, 2016.

Vehicle Miles Traveled (VMT) Analysis

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

Given these travel behavior factors, San Francisco has a lower VMT ratio than the nine-county San Francisco Bay Area region. In addition, some areas of the City have lower VMT ratios than other areas of the City. These areas of the City can be expressed geographically through transportation analysis zones (TAZ). TAZs 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 retail, office, residential, and other land uses, such as day care centers, 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.^{12,13}

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

The project proposed for 250 10th Street includes the expansion of an existing approximately 35,150-gsf school campus to approximately 81,600 gsf. Trips associated with school projects typically function similarly to office projects. School drop-off/pick-up trips are often a side trip within a larger tour. For example, school trips are influenced by the origin (e.g., home) and/or ultimate destination (e.g., work) of those tours. Therefore, school uses are treated as office for screening and analysis. This approach is

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

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

consistent with CEQA Section 21099 and the thresholds of significance for other land uses recommended in OPR's proposed transportation impact guidelines.

Vehicle Miles Traveled Analysis – Schools

The existing average daily VMT per capita for schools is 8.0 for the transportation analysis zone the project site is located in (TAZ 595). The existing regional average daily VMT for schools is 19.1. Fifteen percent below the regional average daily VMT for schools is 16.2. As the project site is located in an area where existing VMT is greater than 15 percent below the existing regional average, the proposed project's school uses would not result in substantial additional VMT and impacts would be less than significant. Furthermore, the project site meets the Proximity to Transit Stations screening criterion, which also indicates the proposed project's school uses would not cause substantial additional VMT.¹⁴

San Francisco 2040 cumulative conditions were projected using a SF-CHAMP model run, using the same methodology as outlined for existing conditions, but includes residential and job growth estimates and reasonably foreseeable transportation investments through 2040. Projected 2040 average daily VMT for schools is 7.0 for the TAZ the project site is located in. Projected 2040 regional average daily VMT for schools is 17.0. Fifteen percent below the projected 2040 regional average daily VMT for schools is 14.5. Given the project site is located in an area where VMT is greater than 15 percent below the projected 2040 regional average, the proposed project's school uses would not result in substantial additional VMT. Thus, the proposed project would not contribute considerably to any substantial cumulative increase in VMT.

Induced Automobile Travel Analysis

A project would have a significant effect on the environment if it would substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow lanes) or by adding new roadways to the network. OPR's proposed transportation impact guidelines includes a list of transportation project types that would not likely lead to a substantial or measureable increase in VMT. If a project fits within the general types of projects (including combinations of types), then it is presumed that VMT impacts would be less than significant and a detailed VMT analysis is not required.

The proposed project is not a transportation project. However, the proposed project would include features that would alter the transportation network. The proposed project would remove the existing 50-foot-long curb cut on 10th Street in front of the existing garage and convert the restored curb length to a white passenger loading zone. The proposed project would also convert one on-street parking space on 10th Street and two on-street parking spaces on Howard Street to white passenger loading zones. These features fit within the types of projects that would not substantially induce automobile travel. Therefore, the impacts would be less than significant.¹⁵

¹⁴ San Francisco Planning Department, *Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis for 250 10th Street*, April 11, 2016.

¹⁵ Ibid.

Trip Generation

The proposed project would expand the capacity of the existing 36,150-gsf Presidio Knolls School campus, which currently accommodates roughly 255 students and 72 faculty/staff. The project proposed would demolish three existing structures (the preschool building, elementary school building, and garage totaling approximately 15,550 gsf), construct an approximately 60,000-gsf school building and an approximately 1,000-gsf music building, and alter the interior and exterior of the existing rectory. The proposed project would result in an approximately 81,600-gsf campus with room for approximately 550 students and 117 faculty/staff.

Presidio Knolls School surveyed parents, guardians, and employees to find out their travel patterns and preferred mode of travel.¹⁶ The school currently conducts drop-off activities between 7:30 a.m. and 9:15 a.m. During this period, early-care drop-off occurs between 7:30 a.m. and 8:00 a.m., students aged four or above are dropped off between 8:00 a.m. and 8:30 a.m., and preschool drop-off occurs between 8:30 a.m. and 9:15 a.m. According to the travel survey, approximately half of drop-off activities occur between 8:15 a.m. and 8:45 a.m. (i.e., peak drop-off period). Afternoon pick-up activities take place between 3:00 p.m. and 6:00 p.m. Students may be picked up after classroom instruction ends (3:30 p.m.) or once after-school programs conclude (5:00 p.m.); however, on Wednesdays pick-up activities occur between 2:15 p.m. and 4:45 p.m. on a typical school day, approximately half of pick-up activities occur between 3:30 p.m. and 4:15 p.m. (i.e., peak pick-up period). Faculty/staff typically arrive between 6:00 a.m. and 7:30 a.m. and leave after classroom instruction ends or once afterschool programs conclude. The proposed project would operate under the existing school schedule.

Table 1 – Net New Daily Project Trip Generation by Mode

	Students					Employees					Total
	Drive Alone	Carpool ¹	Transit	Bike/Walk	Other	Drive Alone	Carpool	Transit	Bike/Walk	Other	
Daily	373	154	30	12	23	27	0	57	6	0	682

¹ Carpool trips assume two students per vehicle trip (i.e., 154 carpool person trips would result in 78 vehicle trips).

Source: CHS Consulting Group, 2015

Trip generation for the proposed project was calculated using the information provided in the travel survey. As shown on **Table 1**, based on the survey results, the proposed project would generate an estimated net new 682 daily person trips (inbound and outbound) by students and staff on a weekday basis, consisting of approximately 478 person trips by auto,¹⁷ 87 transit trips, 16 bike trips, two walk trips, and 23 trips for another means of transportation (e.g., Uber, Lyft). Of the 478 new daily vehicle trips, an estimated 239 trips would take place during the a.m. drop-off period and 239 would take place during the p.m. pick-up period.

Traffic

The Western SoMa PEIR analyzed traffic impacts at 20 intersections in the Plan area. In the PEIR intersection operating conditions are characterized by the concept of Level of Service (LOS),¹⁸ which ranges from A to F and provides a description of an intersection's performance based on traffic volumes,

¹⁶ CHS Consulting Group, *250 Tenth Street (Presidio Knolls School) Transportation Memorandum*, May 5, 2016.

¹⁷ An estimated 154 of the person trips by auto would take place via carpool. It is assumed that each carpool trip would accommodate two students for a total of approximately 78 vehicle trips by carpool.

¹⁸ Intersection operating conditions are characterized by the concept of Level of Service (LOS), which ranges from A to F and provides a description of an intersection's performance based on traffic volumes, intersection capacity, and vehicle delays.

intersection capacity, and vehicle delays. Since certification of the PEIR, the San Francisco Planning Commission passed a resolution¹⁹ to assess vehicle miles traveled instead of automotive delay impacts. Therefore, a discussion of LOS in the project site vicinity is not included in this section.

Of the estimated 478 new daily vehicle trips, approximately 450 vehicle trips would occur during the school's drop-off and pick-up periods, with an estimated 213 new vehicle trips taking place during the peak drop-off period (8:15 a.m. to 8:45 a.m.) and 192 new vehicle trips taking place during the peak pick-up period (3:30 p.m. to 4:15 p.m.).

Traffic count data was collected for the section of 10th Street between Folsom and Howard Streets for a 48-hour period beginning on Wednesday, June 3, 2015. Based on the data collected, traffic on this portion of 10th Street is relatively high during typical drop-off and pick-up periods. Field observations were conducted during a site visit on Wednesday, June 10, 2015, which took place from 7:30 a.m. to 9:00 a.m. and 3:00 p.m. to 5:00 p.m. Traffic is also relatively high on 10th Street as well as 9th and Howard Streets. While traffic in the project site vicinity is typically high and expected project-generated vehicle trips would increase traffic on 10th Street and other streets in the project site vicinity, the majority of the estimated new vehicle trips would occur during the school's drop-off and pick-up peak periods and would not contribute substantially to the existing weekday p.m. peak-period traffic (4:00 p.m. to 6:00 p.m.)²⁰ on 10th Street. Thus, the estimated 213 new vehicle trips during the peak drop-off period and 192 new vehicle trips during the peak pick-up period would not substantially increase traffic volumes at these or other nearby streets relative to the project site's surrounding street network. In addition, the proposed project is within the development projected for the Western SoMa Plan area and analyzed in the PEIR.

Western SoMa PEIR Improvement Measure I-TR-1: Transportation Demand Management Strategies for Future Development Projects was identified to reduce Plan-induced trip generation for those projects that would add more than 3,500 daily vehicle trips or emit criteria pollutants in excess of one or more applicable thresholds. The proposed project would produce an estimated 478 daily vehicle trips. Therefore, PEIR Improvement Measure I-TR-1 is not applicable to the proposed project. However, the project sponsor has agreed to implement the similar **Project Improvement Measure 1: Transportation Management Plan (TMP)**, which would further reduce the proposed project's less-than-significant impacts on traffic. A TMP would encourage parents/guardians and faculty/staff that travel to and from the project site to use alternative means of transportation such as public transit, biking, and walking. Components of a TMP program may include an on-site travel demand management coordinator, dissemination of transportation and trip planning information, and free or subsidized transit passes, among other measures. The TMP would also include new street signage on Howard Street indicating to vehicles that the project site is within a 25 mile per-hour-speed limit zone. A full description of Project Improvement Measure 1 is provided in the Improvement Measures section below.

Western SoMa PEIR Mitigation Measure M-TR-1c: Optimization of Signal Timing at the Eighth/Harrison/I-80 Westbound off-Ramp Intersection was adopted as part of the Plan with uncertain feasibility of implementation. While Mitigation Measure M-TR-1c would reduce traffic impacts at this intersection to a less-than-significant level, implementation would be under the purview of SFMTA in coordination with Caltrans. Thus, implementation of this mitigation measure is uncertain and would

¹⁹ San Francisco Planning Commission, *Resolution Modifying Transportation Impact Analysis*, March 3, 2016

²⁰ Weekday p.m. peak hours generally represent the time when the transportation system is most heavily used and is more likely to reach maximum capacity.

remain significant and unavoidable. This measure is not applicable to the proposed project, as it is a plan-level mitigation to be implemented by City and County agencies.

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

Transit

The project site is located within a quarter mile of several local transit lines including Muni routes 9 (San Bruno), 12 (Folsom-Pacific), 47 (Van Ness) and San Mateo County Transit District (SamTrans) routes 292 (Hillsdale Mall), 397 (Palo Alto Transit Center), and KX (Redwood City). The Civic Center Bay Area Rapid Transit (BART) station is located within roughly one half mile of the project site. Based on the travel survey, parents/guardians, and faculty/staff use Muni routes J (Church), KT (Ingleside/Third Street), L (Taraval), M (Ocean View), N (Judah), 12 (Folsom-Pacific), 14 (Mission), 47 (Van Ness), and 49 (Van Ness/Mission) to access the project site either directly from their home or via other transit connections. The proposed project would be expected to generate 87 daily transit trips. Given the wide availability of nearby transit, the addition of 87 daily transit trips distributed among the transit lines in the area would be accommodated by existing capacity.

The Western SoMa PEIR identified significant cumulative (2030) transit impacts for the “Other Lines” corridor which includes the J (Church), 10 (Townsend), 12 (Folsom-Pacific), 19 (Polk) and 27 (Bryant) routes within the Southeast Screenline related to the additional programmatic growth. The Western SoMa PEIR identified Mitigation Measure M-C-TR-2: Impose Development Impact Fees to Offset Transit Impacts. Even with this mitigation, however, the cumulative transit impact of the Western SoMa Plan Area development was found to be significant and unavoidable and a Statement of Overriding Considerations related to this impact was adopted as part of the PEIR Certification and Plan approval. The proposed project’s 87 daily transit trips would be dispersed across several transit routes and would represent a negligible contribution to Muni screenlines, including the “Other Lines” identified in the PEIR. As such, the proposed project would not make a cumulatively considerable contribution to the unacceptable levels of cumulative transit service identified in the Western SoMa PEIR. Mitigation Measure M-C-TR-2 is therefore not applicable to the proposed project.

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

Loading

The evaluation of loading impacts, as presented in the Western SoMa PEIR, provided an overall comparison of proposed loading supply to general Planning Code requirements and discussed the extent to which the estimated daily and peak-hour loading demand would affect loading conditions throughout the Plan area. Based on the development assumed under the Western SoMa PEIR, the Plan would generate about 487 delivery and service vehicle trips per day and a demand of about 28 loading spaces during the peak hour of loading activities. Because it is expected that individual developments associated with the Plan would include off-street loading spaces consistent with Planning Code requirements, the loading demand generated by these developments would be accommodated within the combination of proposed off-street spaces, and existing on-street loading spaces. Therefore, loading impacts related to the planned growth under the PEIR were found to be less than significant.

However, the PEIR did state that the proposed transportation improvements (e.g., construction of sidewalk extensions and bulbouts) within the Plan area, specifically along Folsom Street, could affect existing yellow commercial vehicle loading/unloading zones. To improve loading conditions along Folsom Street and reduce potential loading impacts to a less-than-significant level, the PEIR identified Mitigation Measure M-TR-4: Provision of New Loading Spaces on Folsom Street to reduce the project loading impacts along Folsom Street. This measure would be applicable to any removal of yellow commercial vehicle freight loading spaces due to planned transportation improvements. The measure further provided guidance on where the relocation of such on-street spaces could occur. This mitigation measure under the PEIR was found to reduce the significant loading impact along Folsom Street to a less-than-significant level. The project site does not front Folsom Street, nor does the proposed project include the removal of a yellow loading zone. Therefore, PEIR Mitigation Measure M-TR-4 would not apply to the proposed project.

Pick-up and drop-off activities currently occur on 10th Street at an approximately 100-foot-long, five-vehicle white loading zone along the school's frontage (Loading Zone 1). The white loading zone consists of five metered parking spaces, which are unavailable to the public on weekdays from 7:00 a.m. to 6:00 p.m. The proposed project would expand Loading Zone 1 and develop an additional two-vehicle loading zone on Howard Street (Loading Zone 2):

- **Loading Zone 1:** The proposed project would remove an existing 50-foot-long curb cut on 10th Street located in front of the existing garage and convert the restored curb length to a white loading zone. An existing 20-foot-long, one-vehicle metered parking space, which is located between Loading Zone 1 and the existing curb cut, would also be converted to a white loading zone. These proposed new loading spaces would be combined with Loading Zone 1 to create an approximately 170-foot-long, eight-vehicle white loading zone.
- **Loading Zone 2:** The proposed project would convert two metered parking spaces in front of the rectory on the northwest perimeter of the project site to a white loading space, resulting in an approximately 40-foot-long, two-vehicle loading zone on Howard Street. Loading Zone 2 would be designated for middle school students.

The proposed changes would provide an additional five vehicle loading spaces, for a total of 10 vehicle loading spaces on the project site.

As previously discussed, student drop-off occurs from 7:30 a.m. to 9:15 a.m. Student pick-up occurs from 3:00 p.m. to 6:00 p.m., with the exception of Wednesdays when pick-up activities occur between 2:15 p.m. and 4:45 p.m. Prior to pick-up and drop-off, faculty and staff place orange cones on 10th Street to indicate areas of ingress and egress from the loading zone.

Currently, approximately 81 vehicle trips take place during the peak drop-off period and 88 vehicle trips take place during the peak pick-up period. An estimated 213 new drop-off peak period vehicle trips and an additional 192 pick-up peak period vehicle trips would be generated by the proposed project. The additional vehicle trips could potentially result in vehicles queuing while waiting to enter the student loading zone. Based on the existing average wait time for vehicles dropping off/picking up students, the proposed project is estimated to generate demand for five vehicle loading spaces should the additional vehicle trips be evenly distributed across the peak periods. However, in order to provide a conservative estimate of loading demand, it is assumed that vehicles arriving to the loading zone may not always be

evenly distributed. Therefore, the proposed project would generate demand for an additional five vehicle loading spaces for a total of 10 vehicle loading spaces on the project site. Currently there are five loading spaces on 10th Street. The proposed project would provide an additional three vehicle loading spaces on 10th Street, adjacent to the existing loading space, and two vehicle loading spaces on Howard Street, in front of the rectory. Thus, the proposed project would provide 10 vehicle loading spaces, meeting the projected demand that would be generated by additional students on the school campus.

Existing plus net new trips would result in an average of approximately seven vehicles per minute during the 30-minute peak drop-off period and approximately four vehicles per minute during the 45-minute peak pick-up period. The proposed loading zones would provide space for 10 vehicles. Thus, the estimated number of vehicles that would use the loading zones each minute during peak drop-off (seven vehicles) and pick-up (four vehicles) could be accommodated by the loading zones. In addition to student unloading/loading activities, the proposed project would generate an average of one delivery/service vehicle trip per day. The delivery/service trip could be accommodated by the proposed loading zones between drop-off and pick-up periods.

Therefore, the proposed project would not result in significant impacts related to loading and would not create potentially hazardous traffic conditions or significant delays affecting traffic or transit beyond those analyzed in the Western Soma PEIR.

Pedestrians

The Western SoMa PEIR found that the estimated 8,366 p.m. peak-hour pedestrian trips generated by development under the Plan would be accommodated on the existing sidewalks and would not substantially affect pedestrian operations on the nearby sidewalks and crosswalks. While the frequency of conflict between pedestrians and vehicles could likely increase as traffic volumes increase along with increases in pedestrian exposure associated with residential and non-residential development, implementation of the Plan would not be expected to have a significant impact on existing pedestrian conditions because neither vehicle traffic volumes nor pedestrian activity would increase to such a degree that a substantial increase in conflicts would be anticipated. Therefore, the PEIR found impacts on pedestrians to be less than significant.

Pedestrian access to the school would be provided on 10th Street at the existing main school gates and the entrance to the rectory on Howard Street. The project site is located within a pedestrian network that includes continuous sidewalks, striped crosswalks, curb ramps, pedestrian walk signals, and other pedestrian facilities. Thus, the estimated two daily pedestrian trips that would be generated by the proposed project could be accommodated on the existing sidewalks and crosswalks in the site vicinity, and would not result in a substantial adverse impact on pedestrian circulation in the site vicinity. In addition, pedestrian traffic in the project site vicinity is low to moderate during the school's drop-off and pick-up periods. Thus, project-generated pedestrian trips would not substantially overcrowd the current pedestrian conditions along 10th, 11th, Howard, and Folsom Streets.

The proposed project is also subject to the Better Streets Plan. The proposed streetscape improvements would comply with the Better Streets Plan requirements, would improve the pedestrian realm adjacent to the project site and promote pedestrian safety and comfort, and would allow for adequate public space and maneuverability for safe pedestrian passage along the sidewalk areas. In addition, the proposed project would not include any features that would potentially increase hazards to pedestrians. The

proposed project would not include sidewalk narrowing, roadway widening, or removal of a center median; conditions that can adversely affect pedestrians. As such, the proposed project would not cause a hazard to pedestrians or otherwise interfere with pedestrian accessibility to the project site and adjoining areas.

Therefore, the proposed project would not result in significant impacts on pedestrian conditions that were not identified in the Western SoMa PEIR.

Bicycles

The Western SoMa PEIR found that bicycle trips due to Plan-generated growth would not increase to such a degree that a substantial increase in conflicts and collisions would be anticipated when compared to existing conditions and thus, would have less-than-significant bicycle impacts.

Bicycle facilities consist of bicycle lanes, trails, and paths, as well as bike parking, bike lockers, and showers for cyclists. On-street bicycle facilities include city-designated Bicycle Routes that are part of the San Francisco Bicycle Network. Bicycle Routes are classified as Class 1, 2, or 3. Class 1 routes are dedicated bike paths for bicyclists and pedestrians which do not allow motorized travel. Class 2 routes are striped bike lanes located between vehicle lanes and curbs/street-side parking. Class 3 routes are unmarked paths where bicyclists often must share travel lanes with motorized vehicles. While Class 3 routes do not feature markings or striping, they often include signage. Bicycle Routes within the site vicinity include Routes 25 (Class 2) and 30 (Class 2). Route 25 has a dedicated bike lane on the east side of 11th Street. Route 30 has dedicated bike lanes on the south side of Folsom Street and the north side of Howard Street. The proposed project would add an estimated 16 net new daily bike trips from additional students and faculty/staff. This level of additional bicycle trips in the project vicinity could be accommodated on existing bicycle facilities.

Pursuant to Planning Code Sections 155.1 and 155.2, the proposed project is required to provide at least 52 Class 1²¹ and 26 Class 2 bicycle parking spaces, for a total of 78 bicycle parking spaces. Five Class I bicycle lockers (10 Class I bicycle parking spaces) would be located along the south side of the parish hall, 20 Class II bicycle racks (40 Class II bicycle parking spaces) would be located along the eastern side of the rectory, and two bicycle racks (4 Class II bicycle parking spaces) would be located on 10th Street near the main entrance, for a total of 54 bicycle parking spaces. As the proposed project would provide fewer Class 1 bicycle parking spaces than required by code, the project sponsor is seeking an exception from Planning Department requirements.

Therefore, the proposed project would not result in significant impacts on bicycle circulation or conditions that were not identified in the Western SoMa PEIR.

Construction

The Western SoMa PEIR found that construction impacts on transportation and circulation are specific to individual development projects and pertain to any potential temporary roadway and sidewalk closures, relocation of bus stops, effects on roadway circulation due to the construction trucks, and the increase in vehicle trips, transit trips, and parking demand associated with construction workers. Construction

²¹ Per Planning Code Section 155.1, Class I bicycle spaces are in secure, weather-protected facilities intended for use as long-term, overnight, and work-day bicycle storage by dwelling unit residents, non-residential occupants, and employees.

impacts were not assessed for the Plan in the PEIR and those potential impacts associated with individual projects are not usually considered significant because they are temporary and generally of short-term duration. Therefore, no significant construction impacts were identified in the PEIR and no mitigation measures were recommended.

The proposed project at 250 10th Street would be implemented in three phases:

- Phase 1 – Exterior and interior alterations to the rectory.
- Phase 2 – Partial demolition of the existing preschool building and construction of the western portion of the new school building, including the playground.
- Phase 3 – Demolition of the remainder of the existing preschool building and construction of the remainder of the new school building, demolition of the existing garage, and construction of the new music building.

Proposed construction activities would last approximately 10 months during construction Phase 1, 12 months during construction Phase 2, and 12 months during construction Phase 3, including demolition, excavation, and building construction. Construction activities would likely occur weekdays from 7:00 a.m. to 3:30 p.m., with Saturday construction taking place, on an as-needed basis, from 8:00 a.m. to 4:00 p.m. All construction work would be conducted in accordance with the San Francisco Noise Ordinance (see Noise section below).

Detailed plans for construction activities have not yet been finalized, but during the anticipated three-phase construction schedule, temporary and intermittent transportation impacts would result from construction-related truck movements to and from the project site during demolition and construction activities associated with the proposed development. Primary access to the site for construction activities would be on 10th Street and Howard Street; however construction workers may need to access the rear of the project site via Kissling Street.

The general contractor would be responsible for all phases of construction, and would be required to follow SFMTA's *Regulations for Working in San Francisco Streets* (the Blue Book). The project is not expected to require off-site staging, or closure/ relocation of travel lanes, or transit facilities. However, should any closure or relocation of sidewalks, travel lanes, and transit facilities be required, the work must be coordinated with SFMTA's Interdepartmental Staff Committee on Traffic and Transportation and a public meeting would be held. The general contractor would also be required to develop a construction management plan for review and approval by SFMTA's Transportation Advisory Committee, which consists of representatives of City departments including SFMTA, Public Works, the Fire Department, the Police Department, the Department of Public Health, the Port of San Francisco, and the Taxi Commission. SFMTA would have to be reimbursed for any installation or removal of temporary signage or striping. In addition, prior to commencing with construction activities, the general contractor would coordinate construction activities with Muni's Street Operations and Special Events Office to reduce any impacts on transit operations in the site vicinity.

There would be a flow of construction-related traffic to and from the project site throughout the construction period. Construction workers and construction vehicles would need to access the site throughout the construction period. During construction, the proposed project is estimated to generate 30 construction worker vehicle trips and one construction equipment vehicle trip per day. Construction workers would be able to use nearby transit lines to reach the project site, and the project sponsor has

indicated that arrangements would likely be made for construction workers to access off-street parking. Construction activities would temporarily increase traffic volume, but the additional trips would not substantially affect traffic conditions. Moreover, construction-related impacts, generally, would not be considered significant due to their temporary and limited duration.

Construction of the proposed project, which is anticipated to last approximately 34 non-consecutive months, would likely take place simultaneous to the construction of other projects in the project site vicinity. Projects proposed for development in the project site vicinity include, but are not limited to 1455-1465 Folsom Street (the Millennium School project) and 241 10th Street.²² Given the proximity of the sites to each other and the possible overlap in construction schedules, the potential exists for construction of the proposed project, 241 10th Street, and the Millennium School project to result in increased traffic levels due to employee ingress and egress, excavation, and the delivery of construction materials via trucks. Should this occur, coordination of construction activities with other projects would reduce potential construction-generated traffic impacts. As discussed above, the proposed project would develop a construction management plan, subject to the review and approval of SFMTA's Transportation Advisory Committee, to minimize construction impacts on nearby businesses, and minimize traffic and parking demand associated with construction workers. In addition, construction of other projects in the project vicinity is not anticipated to substantially increase the number of construction-related trips in the project vicinity. Thus, the proposed project would not result in significant construction-related impacts on transportation.

While construction-related transportation impacts would be less-than-significant, limiting construction-related traffic to non-peak hours, identifying optimal circulation routes and construction staging areas, among other measures, would further reduce potential construction impacts. These measures are included as **Project Improvement Measure 2: Construction Management Plan** (full text provided in the Improvement Measures section below).

Parking

As discussed on pages 18-19, the proposed project does not meet the criteria for a Transit Priority Infill development. Thus this CPE Checklist considers the adequacy of parking in determining the significance of project impacts under CEQA.

The project site is located in RCD and WMUG Districts where, pursuant to Section 151.1 of the Planning Code, the proposed project would not be required to provide any off-street parking spaces. The proposed project would include demolition of a garage with space for two vehicles on the project site. However, the garage is currently used for storage, and thus does not provide readily accessible off-street parking. The proposed project would remove five on-street parking spaces (two on 10th Street and three on Howard Street) and convert them into loading zones. No new off-street parking is proposed for the project.

Based on the travel survey, approximately 30 faculty/staff commute to the school via single-occupancy vehicles and therefore require parking spaces during the day. The proposed project is estimated to generate 27 net new faculty/staff single-occupancy vehicle trips, resulting in a total parking demand of approximately 57 spaces.

²² Proposed projects include 1455-1465 Folsom Street (Case No. 2015-013268ENV) and 24110th Street (Case No. 2014.0666E).

As no off-street parking spaces are proposed, the project would result in a parking shortfall of 57 spaces. However, the unmet parking demand could be accommodated through existing on-street parking. Approximately 169 on-street parking spaces are located within a one-block radius of the school. Based on field observation, roughly 65 percent of those parking spaces (108 spaces) are occupied in the morning and 79 percent (133 spaces) are occupied in the afternoon. This would leave roughly 61 to 36 available in the morning and in the afternoon, respectively. The site is also well served by public transit and bicycle facilities, as discussed in the Transit and Bicycles sub-sections. In addition, implementation of **Project Improvement Measure 1: Transportation Management Plan** (discussed in the Traffic sub-section) would further reduce any less-than-significant conflicts arising from a parking shortfall.

While any unmet demand for parking spaces could be accommodated by existing transportation infrastructure, parking conditions are not static, as parking supply and demand varies from day to day, from day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel. The absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. 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. Thus, the proposed project would not result in a substantial parking shortfall that would create hazardous traffic conditions or overtax the capacity of the surrounding transportation system.

The project site is not located within an airport land use plan area, or in the vicinity of a private airstrip. Therefore, the Community Plan Exemption Checklist topic 4c is not applicable. Similarly, consistent with the Western SoMa PEIR, topic 4d is not applicable because the project does not include design features that would be expected to result in particular safety hazards or introduce incompatible uses.

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

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
6. NOISE—Would the project:				
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Be substantially affected by existing noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Western SoMa PEIR identified potential conflicts related to residences and other noise-sensitive uses in proximity to noise-generating uses such as PDR, retail, entertainment, cultural/institutional/educational uses, and office uses. In addition, the Western SoMa PEIR noted that implementation of the Community Plan would incrementally increase traffic-generated noise on some streets in the Plan area and result in construction noise impacts from pile driving and other construction activities. The Western SoMa PEIR identified six noise mitigation measures that would reduce noise impacts to less-than-significant levels. However, the PEIR determined that even with the identified mitigation measures cumulative impacts on noise would remain significant and unavoidable.

Operational Noise

The proposed project would alter an existing preschool and elementary school campus in order to accommodate additional students and employees. Therefore, the project sponsor conducted an environmental noise study to determine the amount of noise that would be generated by the additional students in the school's outdoor areas and the potential impact the proposed project would have on the existing noise environment.²³ The study analyzed whether proposed activities would raise noise at the property line greater than 8 dBA above existing levels.²⁴

Noise levels on the project site were found to be between 76 dBA and 78 dBA on 10th Street, 63 dBA on Kissling Street (adjacent to the basketball court), and 57 dBA in the preschool courtyard. The noise measurement at Kissling Street was taken during recess and is indicative of the ambient noise on the site when students are at play. Based on this measurement, the report found that the estimated additional 274 elementary school students would increase noise on the project site by an estimated 5 dBA. Thus, the report concludes that the proposed project would not increase ambient noise at the property line more than 8 dBA above existing levels. Therefore, the proposed project would not result in significant impacts on the existing noise environment.

²³ CSDA Design Group, *Presidio Knolls Scholl, 250 10th Street, San Francisco, Environmental Noise Study*, December 8, 2015.

²⁴ Eight dBA is a threshold used by the Planning Department for the purpose of analyzing the potential impact of project-generated noise on the project vicinity.

The proposed project would be subject to the following interior noise standards, which are described for informational purposes: the California Building Standards Code (Title 24), which establishes uniform noise insulation standards. The acoustical requirements of Title 24 are incorporated into the San Francisco Green Building Code. Title 24 allows the project sponsor to choose between a prescriptive or performance-based acoustical requirement for non-residential uses. Both compliance methods require wall, floor/ceiling, and window assemblies to meet certain sound transmission class or outdoor-indoor sound transmission class ratings to ensure that adequate interior noise standards are achieved. In compliance with Title 24, DBI would review the final building plans to ensure that the building wall, floor/ceiling, and window assemblies meet Title 24 acoustical requirements. If determined necessary by DBI, a detailed acoustical analysis of the exterior wall and window assemblies may be required.

Construction Noise

Western SoMa PEIR Mitigation Measures M-NO-2a: General Construction Noise Control Measures and M-NO-2b: Noise Control Measures during Pile Driving require implementation of noise control measures during general and pile-driving construction in order to reduce construction-related noise and groundborne vibration impacts. The proposed project construction would involve demolition of three structures, excavation, grading, and construction of the proposed buildings. Therefore, the construction of this project would contribute to construction-related noise and vibration impacts identified in the Western SoMa PEIR, and PEIR Mitigation Measure M-NO-2a would apply to the proposed project. The project sponsor has agreed to implement Mitigation Measure M-NO-2a as **Project Mitigation Measure 4** (full text provided in the Mitigation Measures section below). According to the geotechnical investigation prepared for the proposed project the proposed buildings may be accommodated with a spread footing or mat slab foundation.²⁵ The project sponsor does not anticipate the use of pile drivers for either foundation type.²⁶ Therefore, Mitigation Measure M-NO-2b does not apply to the proposed project.

In addition, all construction activities for the proposed project (occurring over the course of approximately 34 months) would be subject to and would comply with the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code) (Noise Ordinance). The Noise Ordinance requires that construction work be conducted in the following manner: (1) noise levels of construction equipment, other than impact tools, must not exceed 80 dBA²⁷ at a distance of 100 feet from the source (the equipment generating the noise); (2) impact tools must have intake and exhaust mufflers that are approved by the Director of San Francisco Public Works (Public Works) or the Director of the Department of Building Inspection (DBI) to best accomplish maximum noise reduction; and (3) if the noise from the construction work would exceed the ambient noise levels at the site property line by 5 dBA, the work must not be conducted between 8:00 p.m. and 7:00 a.m. unless the Director of Public Works authorizes a special permit for conducting the work during that period.

DBI is responsible for enforcing the Noise Ordinance for private construction projects during normal business hours (8:00 a.m. to 5:00 p.m.). The Police Department is responsible for enforcing the Noise Ordinance during all other hours. Nonetheless, during the construction period for the proposed project occupants of the nearby properties could be disturbed by construction noise. Times may occur when

²⁵ Earth Mechanics Consulting Engineers, *250 10th Street, San Francisco, CA*, June 9, 2013.

²⁶ San Francisco Planning Department, *Email to Jenny Delumo Re: PKS-250 10th Street – Foundation*, February 29, 2016.

²⁷ 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.

noise could interfere with indoor activities in nearby residences and other businesses near the project site and may be considered an annoyance by occupants of nearby properties. The increase in noise in the project area during project construction would not be considered a significant impact of the proposed project, because the construction noise would be temporary (approximately 34 months), intermittent, and restricted in occurrence and level, as the contractors would be subject to and would comply with the Noise Ordinance. Compliance with the Noise Ordinance would reduce construction-related noise effects on nearby residences.

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

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

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
7. AIR QUALITY—Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

Construction Dust Control

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

of the general public and of on-site workers, minimize public nuisance complaints, and to avoid orders to stop work by DBI. Construction activities from the proposed project would result in dust, primarily from ground-disturbing activities. In compliance with the Construction Dust Control Ordinance, the project sponsor and contractor responsible for construction activities at the project site would be required to control construction dust on the site through a combination of watering disturbed areas, covering stockpiled materials, sweeping streets and sidewalks, and other measures.

The Western SoMa PEIR found that compliance with the Construction Dust Ordinance would reduce impacts construction dust-related impacts to a less-than-significant level. The proposed project would be subject to and would comply with the Construction Dust Control Ordinance, which would ensure that these impacts would remain less than significant.

Regional Criteria Air Pollutants

In accordance with the state and federal Clean Air Acts, air pollutant standards are identified for the following six criteria air pollutants: ozone, carbon monoxide, particulate matter, nitrogen dioxide, sulfur dioxide, 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 San Francisco Bay Area Air Basin (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, PM_{2.5}, and PM₁₀, for which these pollutants are designated as non-attainment for either the state or federal standards. By its very nature, regional air pollution is largely a cumulative impact in that no single project is sufficient in size to, by itself, result in non-attainment of air quality standards. Instead, a project's individual emissions contribute to existing cumulative air quality impacts. If a project's contribution to cumulative air quality impacts is considerable, then the project's impact on air quality would be considered significant.

The BAAQMD prepared updated *2011 BAAQMD CEQA Air Quality Guidelines* (Air Quality Guidelines),²⁸ which provided new methodologies for analyzing air quality impacts. The Air Quality Guidelines also provide screening criteria for those criteria air pollutants that the SFBAAB is in non-attainment. The screening criteria are used by the City to help assess whether a project's criteria air pollutant emissions would violate an air quality standard, contribute to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants.

Pursuant to the Air Quality Guidelines, projects that meet the screening criteria do not have a significant impact related to criteria air pollutants, and in most cases do not require project-specific operational or construction air quality emission analysis. The proposed project would expand the existing Presidio Knolls School campus by approximately 45,450 gsf, resulting in an approximately 81,600 gsf campus that could accommodate an additional 295 students (274 elementary and middle school students and 21 preschool students) and 45 faculty/staff. Thus, the proposed project meets the Air Quality Guidelines screening criteria for construction and operations.²⁹ In addition, the proposed project would include approximately 1,050 cubic yards of soil would be excavated and transported off-site. This does not exceed

²⁸ Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, updated May 2011. See pp. 3-2 to 3-3.

²⁹ The screening criteria level for a "Day-Care Center" is 53,000 square feet for operations and 277,000 square feet for construction. The screening criteria level for an "Elementary School" is 271,000 square feet or 2,747 students for operations and 277 thousand square feet or 3,904 students for construction. The screening criteria level for a "Junior High School" is 285,000 square feet or 2,460 students for operations and 277 thousand square feet or 3,261 students for construction.

the BAAQMD's screening criteria that states that construction-related activities should not include extensive material transport (i.e., greater than 10,000 cubic yards of soil import/export) requiring a considerable amount of haul truck activity.

Construction

Western SoMa PEIR Mitigation Measure M-AQ-6: Construction Emissions Minimization Plan for Criteria Air Pollutants requires a development project that may exceed the standards for criteria air pollutants to undergo an analysis of its construction emissions. If, based on that analysis, the construction emissions may be significant the project sponsor shall submit a Construction Emissions Minimization Plan for review and approval by the Planning Department. As discussed above, the proposed project does not exceed the BAAQMD's construction screening criterion for the "day-care center", "elementary school", and "junior high school" land use types. For this reason, PEIR Mitigation Measure M-AQ-6 is not applicable to the proposed project. Therefore, the proposed project would not result in significant construction-related impacts on criteria air pollutants.

Operation

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

The proposed project would generate criteria pollutant emissions associated with vehicle traffic (mobile sources), on-site area sources (i.e., natural gas combustion for space and water heating, and combustion of other fuels by building and grounds maintenance equipment), energy usage, and testing of a backup diesel generator. As discussed above, the proposed project does not exceed the BAAQMD's construction screening criterion for the proposed school uses. Therefore, the proposed project would not result in significant operations-related impacts on criteria air pollutants.

Health Risk

Subsequent to certification of the Western SoMa PEIR, the San Francisco Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes (Ordinance No. 224-14, effective December 7, 2014), generally referred to as Health Code Article 38: Enhanced Ventilation Required for Urban Infill Sensitive Use Developments (Article 38). The purpose of Article 38 is to protect the public health and welfare by establishing an Air Pollutant Exposure Zone (APEZ) and imposing an enhanced ventilation requirement for all urban infill sensitive use development within the APEZ. The APEZ, as defined in Article 38, consists of areas that, based on modeling of all known air pollutant sources, exceed health protective standards for cumulative PM_{2.5} concentration and cumulative excess cancer risk. The APEZ incorporates health vulnerability factors and proximity to freeways. Projects within the APEZ require special consideration to determine whether the project's activities would expose sensitive receptors to substantial air pollutant concentrations or add emissions to areas already adversely affected by poor air quality. The project site is within an APEZ. Thus, the project sponsor enrolled in the Article 38 program with DPH.³⁰

³⁰ Mara Chase, *Application for Article 38 Compliance Assessment, 1870 Market Street*, October 16, 2015.

Construction

Western SoMa PEIR Mitigation Measure M-AQ-7: Construction Emissions Minimization Plan for Health Risks and Hazards requires projects proposing construction in areas of poor air quality to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants. PEIR Mitigation Measure M-AQ-7 requires, among other things, diesel equipment to meet a minimum performance standard (all engines greater than 25 horsepower must meet Tier 2 emissions standards and be equipped with a Level 3-verified diesel emissions control strategy). The project site is located within an APEZ, and construction activities from the proposed project would result in DPM and other TACs from equipment exhaust, construction-related vehicular activity, and construction worker automobile trips. Construction would last approximately 34 non-consecutive months from around September 2016 through August 2021, and diesel-generating equipment would be required for the duration of the project's construction phase. As a result, the proposed project's temporary and variable construction activities would result in short-term emissions of DPM and other TACs that would add emissions to areas already adversely affected by poor air quality. Therefore, PEIR Mitigation Measure M-AQ-7 is applicable to the proposed project. The project sponsor has agreed to implement PEIR Mitigation Measure M-AQ-7 as **Project Mitigation Measure 5** (full text provided in the Mitigation Measures section below).

Siting Sensitive Land Uses

For sensitive use projects within an APEZ as defined by Article 38, the Ordinance requires that the project sponsor submit an Enhanced Ventilation Proposal for approval by DPH that achieves protection from PM_{2.5} equivalent to that associated with a Minimum Efficiency Reporting Value 13 filtration. DBI will not issue a building permit without written notification from the Director of Public Health that the applicant has an approved Enhanced Ventilation Proposal. The proposed school project is considered a sensitive use project and is therefore subject to this requirement. As discussed above, the project sponsor has submitted an Article 38 application to DPH.

The proposed project would not include a backup diesel generator or other source that would emit DPM, a TAC. Western SoMa PEIR Mitigation Measure M-AQ-4: Siting of Uses that Emit PM_{2.5} or DPM and Other TACs requires analysis of operational emissions for new development that would generate substantial levels of TACs as part of everyday operations, whether from stationary or mobile sources. Therefore, the Western SoMa Mitigation Measure M-AQ-4 would not be applicable to the proposed project.

Objectionable Odors

As noted in the Western SoMa PEIR, the likely potential sources of odors in the Plan area are generally limited to coffee roasters and auto body shops. Because the proposed project does not include such a use or any other odor-creating use, it would not create objectionable odors affecting a substantial number of people.

Conclusion

As discussed above, the proposed project would be required to comply with the air quality regulations contained in the City's health and building codes. Furthermore, implementation of **Project Mitigation Measure 5** would reduce construction-related air quality impacts to less-than-significant levels. For these

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

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

The Bay Area Air Quality Management District (BAAQMD) has prepared guidelines and methodologies for analyzing greenhouse gas (GHG) emissions. These guidelines are consistent with CEQA Guidelines Sections 15064.4 and 15183.5 which address the analysis and determination of significant impacts from a proposed project’s GHG emissions and allow for projects that are consistent with a Qualified GHG Reduction Strategy to conclude that the project’s GHG impact is less than significant. San Francisco’s *Strategies to Address Greenhouse Gas Emissions* (GHG Reduction Strategy)³¹ presents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco’s Qualified GHG Reduction Strategy in compliance with the BAAQMD and CEQA guidelines. These GHG reduction actions have resulted in a 23.3 percent reduction in GHG emissions in 2012 compared to 1990 levels,³² exceeding the year 2020 reduction goals outlined in the BAAQMD’s *2010 Clean Air Plan*, Executive Order S-3-05, and Assembly Bill 32 (also known as the Global Warming Solutions Act).³³ In addition, San Francisco’s GHG reduction goals are consistent with, or more aggressive than, the long-term goals established under Executive Orders S-3-05³⁴ and B-30-15.^{35,36} Therefore, projects that are consistent with San Francisco’s GHG Reduction Strategy would not result in GHG emissions that would have a significant effect on the environment and would not conflict with state, regional, and local GHG reduction plans and regulations.

³¹ San Francisco Planning Department, *Strategies to Address Greenhouse Gas Emissions in San Francisco*, November 2010. Available at http://sfmea.sfplanning.org/GHG_Reduction_Strategy.pdf, accessed March 3, 2016.

³² ICF International, *Technical Review of the 2012 Community-wide GHG Inventory for the City and County of San Francisco*, January 21, 2015. Available at http://sfenvironment.org/sites/default/files/fliers/files/icf_verificationmemo_2012sfcommunityinventory_2015-01-21.pdf, accessed March 16, 2015.

³³ Executive Order S-3-05, Assembly Bill 32, and the Bay Area 2010 Clean Air Plan set a target of reducing GHG emissions to below 1990 levels by year 2020.

³⁴ Executive Order S-3-05, sets forth a series of target dates by which statewide emissions of GHGs need to be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels (approximately 457 million MTCO₂E); by 2020, reduce emissions to 1990 levels (estimated at 427 million MTCO₂E); and by 2050 reduce emissions to 80 percent below 1990 levels (approximately 85 million MTCO₂E).

³⁵ Executive Order B-30-15 sets a State GHG emissions reduction goal of 40 percent below 1990 levels by the year 2030.

³⁶ San Francisco’s GHG Reduction Goals are codified in Section 902 of the Environment Code and include: (i) by 2008, determine City GHG emissions for year 1990; (ii) by 2017, reduce GHG emissions by 25 percent below 1990 levels; (iii) by 2025, reduce GHG emissions by 40 percent below 1990 levels; and by 2050, reduce GHG emissions by 80 percent below 1990 levels.

The Western Soma PEIR determined that the goals and policies of the Western SoMa Plan were consistent with San Francisco's Qualified GHG Reduction Strategy and that implementation of the area plans and policies would ensure that subsequent development would be consistent with GHG plans and would result in less-than-significant GHG-related impacts. In addition, the PEIR assessed the GHG emissions that could result from implementation of the Western SoMa Community Plan. The PEIR concluded that the resulting GHG emissions from plan implementation would be less than significant. No mitigation measures were identified in the PEIR.

The proposed expansion of the Presidio Knolls School campus would increase activity on the project site. Therefore, the proposed project would contribute to annual long-term increases in GHGs as a result of increase vehicle trips to and from the project site (mobile sources) and institutional operations that would result in an increase in energy use, water use, wastewater treatment, and solid waste disposal. The project's construction-related activities would also result in temporary increases in GHG emissions.

The proposed project would be subject to and required to comply with several regulations adopted to reduce GHG emissions as identified in the GHG Reduction Strategy. The adopted regulations applicable to the proposed project would reduce GHG emissions from the transportation, energy, waste, and environment/conservation sectors. Compliance with the City's Commuter Benefits Ordinance, Emergency Ride Home Program, and Transportation Sustainability Fee would reduce the proposed project's transportation-related emissions. The proposed project would be required to comply with the City's Green Building requirements, Stormwater Management Ordinance, Water Conservation and Irrigation Ordinances, and Energy Conservation Ordinance, which would reduce the proposed project's energy-related emissions.³⁷ The proposed project's waste-related emissions would be reduced through compliance with the City's Recycling and Compositing Ordinance, Construction and Demolition Debris Recovery Ordinance, and Green Building Code requirements. Compliance with the City's Street Tree Planting requirements would serve to increase carbon sequestration. Other regulations, including those limiting refrigerant emissions, and requiring low-emitting finishes, would reduce emissions of GHGs and black carbon, respectively. Additionally, the project would be required to meet the renewable energy criteria of the Green Building Code. The project sponsor is required to comply with these regulations and the proposed project was determined to be consistent with San Francisco's GHG Reduction Strategy.³⁸

Therefore, the proposed project's GHG emissions would not conflict with state, regional, and local GHG reduction plans and regulations; and the proposed project's contribution to GHG emissions would not be cumulatively considerable or generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment. As such, the proposed project would result in a less-than-significant impact with respect to GHG emissions. For the above reasons, the proposed project would not result in significant impacts that were not identified in the Western SoMa PEIR.

As the proposed project is within the development projected under the Western SoMa Community Plan, there would be no additional impacts on GHG emissions (including cumulative impacts) beyond those analyzed in the Western SoMa PEIR.

³⁷ Compliance with water conservation measures reduce the energy required to convey, pump and treat water required for the project.

³⁸ projectFOCUS, *Greenhouse Gas Analysis: Compliance Checklist*, May 23, 2016.

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

Wind

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

The proposed project would construct an approximately 48-foot-tall building and a 19-foot-tall building; therefore, PEIR Mitigation Measure M-WS-1 would not apply to the proposed project.

Shadow

Planning Code Section 295 generally prohibits new structures above 40 feet in height that would cast additional shadows on property under the jurisdiction of the San Francisco Recreation and Park Commission (SFRPC) between one hour after sunrise and one hour before sunset, at any time of the year, unless that shadow would not result in a significant adverse effect on the use of the open space.

The Western SoMa PEIR analyzed the potential impacts of Plan-generated development on five parks and open spaces under the jurisdiction of SFRPC. Of those five parks and open spaces Howard-Langton Mini Park is located within the Plan area boundaries. The other four, South of Market Recreation Center, Victoria Manalo Draves Park, Civic Center Plaza, and U.N. Plaza are located in close proximity to the Plan area. The Western SoMa PEIR determined that implementation of the Western SoMa Community Plan would have a significant and unavoidable impact related to the creation of new shadows in a manner that would substantially affect outdoor recreation facilities or other public areas. No mitigation measures were identified in the PEIR.

The proposed project would construct an approximately 48-foot-tall building and a 19-foot-tall building. Therefore, the Planning Department prepared a preliminary shadow fan analysis to determine whether the project would have the potential to cast new shadow on nearby parks.³⁹ The shadow fan analysis found that the proposed project would not cast shadows on an open space under the jurisdiction of the SFRPC or other public parks or open space.

The proposed project would shade portions of nearby streets and sidewalks and private property (including private open spaces) at times within the project vicinity. Shadows upon streets and sidewalks

³⁹ San Francisco Planning Department, *Preliminary Shadow Fan Analysis for 250 10th Street, February 25, 2016.*

would not exceed levels commonly expected in urban areas and would be considered a less-than-significant effect under CEQA. Although occupants of nearby property may regard the increase in shadow as undesirable, the limited increase in shading of private properties as a result of the proposed project would not be considered a significant impact under CEQA.

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

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
10. RECREATION—Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Physically degrade existing recreational resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

As the proposed project would not degrade existing recreational facilities and is within the development projected under the Western SoMa Community Plan, there would be no additional project-level or cumulative impacts on recreation beyond those analyzed in the Western SoMa PEIR.

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
11. UTILITIES AND SERVICE SYSTEMS— Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Western SoMa PEIR determined that the anticipated increase in population (housing and employment) would not result in a significant impact to the provision of water, wastewater collection and treatment, and solid waste collection and disposal. As analyzed in the Western SoMa PEIR, the applicable utility and service providers were determined to have the capacity to accommodate the Plan growth, which would include the proposed project. No mitigation measures were identified in the PEIR.

As the proposed project is within the development projected under the Western SoMa Community Plan, and conditions have not substantially changed since that analysis, there would be no additional project-level or cumulative impacts on utilities and service systems beyond those analyzed in the Western SoMa PEIR.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
12. PUBLIC SERVICES—Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Western SoMa PEIR determined that the anticipated increase in population would not result in a significant impact to public services, including fire protection, police protection, and public schools. No mitigation measures were identified in the PEIR.

The PEIR estimated that project-generated development would result in approximately 562 additional students in the Plan area.⁴⁰ The proposed expansion of the Presidio Knolls School campus does not include housing, and therefore would not introduce new residents to the project site who would need to access public schools. In addition, Presidio Knolls School is a private institution. Therefore the additional students would not be entering a San Francisco Unified School District school and would not result in the need for new or physically altered School District school facilities.

As the proposed project is within the development projected under the Western SoMa Community Plan, there would be no additional impacts on public services beyond those analyzed in the Western SoMa PEIR.

Topics:	Significant Impact Peculiar to Project or Project Site	Significant Impact not Identified in PEIR	Significant Impact due to Substantial New Information	No Significant Impact not Previously Identified in PEIR
13. BIOLOGICAL RESOURCES—Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

As discussed in the Western SoMa PEIR, the Western SoMa Community Plan area is almost fully developed with buildings and other improvements such as streets and parking lots. Most of the project

⁴⁰ San Francisco Planning Department, *Western SoMa Community Plan, Rezoning of Adjacent Parcels, and 350 Eighth Street Project Final Environmental Impact Report (FEIR)*, Planning Department Case Nos. 2008.0877E and 2007.1035E. This document is available for review at 1650 Mission Street, Suite 400, as part of Case Nos. 2008.0877E and 2007.1035E.

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

The Western SoMa PEIR determined that the Plan would result in significant but mitigatable impacts on special-status birds and bats that may be nesting in trees or roosting in buildings that are proposed for removal/demolition as part of an individual project. The Western SoMa PEIR identified PEIR Mitigation Measures M-BI-1a Pre-Construction Special-Status Bird Surveys and M-BI-1b Pre-Construction Special-Status Bat Surveys, and determined that the measures would reduce these impacts to a less-than-significant level.

Western SoMa PEIR Mitigation Measure M-BI-1a requires that conditions of approval for building permits issued for construction of projects within the Western SoMa Community Plan area include a requirement for pre-construction special-status bird surveys when trees would be removed or buildings demolished as part of an individual project. Pre-construction special-status bird surveys shall be conducted by a qualified biologist between February 1 and August 15 if tree removal or building demolition is scheduled to take place during that period. The proposed project would demolish the existing preschool building, elementary school building, and garage. The project sponsor anticipates that a portion of the construction work, including demolition, would take place during summer recess which is between mid-June and early August. Therefore, PEIR Mitigation Measure M-BI-1a would apply to the proposed project. The project sponsor has agreed to implement PEIR Mitigation Measure M-BI-1a as **Project Mitigation Measure 6** (full text provided in the Mitigation Measures section below).

Western SoMa PEIR Mitigation Measure M-BI-1b requires pre-construction special-status bat surveys by a qualified bat biologist when large trees (those with trunks over 12 inches in diameter) are to be removed, or vacant buildings or buildings used seasonally or not occupied, especially in the upper stories, are to be demolished. The proposed project would involve demolition of three buildings on the project site. Over the course of the school year, Presidio Knolls School holds recess periods where a reduced number of students and staff utilize the preschool and elementary school buildings. The one-story garage, which would also be demolished, is primarily used for year-round storage. In addition, the proposed project would not remove any large trees on the project site. Therefore, PEIR Mitigation Measure M-BI-1b would not apply to the proposed project.

The Western SoMa Community Plan identified Biological Resources Improvement Measure I-BI-2 Night Lighting Minimization which would further reduce the proposed project's less-than-significant effects on birds from night lighting. The project sponsor has agreed to implement Improvement Measure I-BI-2 as **Project Improvement Measure 3** (full description provided in the Improvement Measures section below).

For the reasons above, the proposed project would not result in significant impacts on biological resources beyond those identified in the Western SoMa PEIR.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
14. GEOLOGY AND SOILS—Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Change substantially the topography or any unique geologic or physical features of the site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Community Plan Exemption Checklist topic 13a(i), 13a(iv), 13c as they relate to collapsible soils, topic 13(e) and 13(f) are not applicable because the Western SoMa PEIR concluded that these types of impacts would not occur in the Plan Area. The project geotechnical analysis confirms this conclusion for the project site.

The Western SoMa PEIR concluded that implementation of the Western SoMa Community Plan would indirectly increase the population that would be subject to an earthquake, including seismically induced groundshaking, liquefaction, and landslides. The PEIR also noted that new development under the Plan would be generally safer than comparable older development due to improvements in building codes and construction techniques. Compliance with applicable codes and recommendations made in project-specific geotechnical analyses would not eliminate earthquake risk, but would reduce them to an

acceptable level, given the seismically active characteristics of the Bay Area. Therefore, the PEIR concluded that implementation of the Community Plan would not result in significant impacts related to geological hazards. No mitigation measures were identified in the Western SoMa PEIR.

The proposed project would demolish three existing structures (the preschool building, elementary school building, and garage totaling approximately 15,550 gsf), construct an approximately 60,000-gsf school building and an approximately 1,000-gsf music building, and alter the interior and exterior of the existing rectory. The proposed project would result in an approximately 81,600-gsf campus with room for approximately 550 students and 117 faculty/staff.

A geotechnical investigation was prepared for the proposed project. The investigation included a subsurface investigation and reconnaissance of the project site and vicinity. The report determined that the proposed buildings could be supported on a spread footing foundation, mat foundation, or drilled pier foundation. Drilled piers may also be used for shoring and underpinning, if needed. Installation of any of the recommended foundation systems would require use of footing to support retaining walls. The project site is located within a liquefaction hazard zone, and the report concludes that the potential for damage from surface ruptures from faults, land sliding, liquefaction, or lateral spreading is relatively low. The report concluded that the project site is appropriate for construction of the proposed project provided the project sponsor implements the recommendations provided in the report.

The project would be required to conform to the San Francisco Building Code, which ensures the safety of all new construction in the City. DBI will review the project-specific geotechnical report during its review of the building permit for the project. In addition, DBI may require additional site specific soils report(s) through the building permit application process, as needed. The DBI requirement for a geotechnical report and review of the building permit application pursuant to DBI's implementation of the Building Code would ensure that the proposed project would have no significant impacts related to soils, seismic or other geological hazards.

In light of the above, the proposed project would not result in significant impacts related to geology and soils that were not identified in the Western SoMa PEIR.

Paleontological Resources

The Western SoMa PEIR determined that implementation of the Community Plan would have low potential to uncover unique or significant fossils or other unique geologic features as geological materials that would be disturbed by construction excavations in the Plan area would have little to no likelihood of containing such fossils or features. Therefore, the PEIR found that Plan-generated growth would have less-than-significant impacts on paleontological resources.

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

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

Community Plan Exemption Checklist topic 14b, 14c, 14d, 14i, and 14j are not applicable because the Western SoMa PEIR concluded that these types of impacts would not occur with Plan development. The Western SoMa PEIR determined that the anticipated increase in population would not result in a significant impact to hydrology and water quality, including the combined sewer system and the potential for combined sewer outflows. No mitigation measures were identified in the PEIR.

The project site is developed with a five-building school campus. With the exception of two trees in the preschool play yard, one tree at the rear of the garage, and six street trees, the majority of the project site is covered in impervious surfaces. The proposed project would plant five additional street trees (two

along the 10th Street frontage and three along the Howard Street frontage). The proposed project would not result in an increase in the amount of impervious surface on the site and would not increase the amount of stormwater runoff and drainage.

Therefore, the proposed project would not result in any impacts related to hydrology and water quality that were not identified in the Western SoMa PEIR.

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

Community Plan Exemption Checklist topics 15e and 15f are not applicable because the Western SoMa PEIR analysis concluded that development under the Plan would not result in these types of impacts. The Western SoMa PEIR identified less-than-significant impacts related to the routine transport, use, or disposal of hazardous materials, the potential for the Plan or subsequent development projects within the Plan area to interfere with an adopted emergency response plan, and the potential for subsequent projects to expose people or structures to a significant risk with respect to fires.

Hazardous Building Materials

The Western SoMa PEIR found that Plan-generated development may involve demolition or renovation of existing structures containing hazardous building materials. As discussed in the PEIR, there is a high potential to encounter hazardous materials during construction activities such as polychlorinated biphenyls (PCBs), mercury, asbestos and lead-based paint in many parts of the Plan area because of the presence of 1906 earthquake fill, previous and current land uses associated with the use of hazardous materials, and known or suspected hazardous materials cleanup cases. The PEIR identified Mitigation Measure M-HZ-2: Hazardous Building Materials Abatement to reduce this impact to a less-than-significant level.

The proposed project would involve demolition of three structures on the project site, which were constructed between 1960 (the preschool building and garage) and 1961 (the elementary school building). Because these structures were built before the 1970s, hazardous building materials such as PCBs, mercury, asbestos and lead-based paint are likely to be present in this structure. Demolishing the existing structures could expose workers or the community to hazardous building materials. Thus, PEIR Mitigation Measure M-HZ-2 would apply to the proposed project. The project sponsor has agreed to implement Mitigation Measure M-HZ-2 as **Project Mitigation Measure 7** (full text provided in the Mitigation Measures section below). With implementation of this project mitigation measure, the proposed project's impacts related to hazardous building materials would be less than significant.

Soil and Ground Water Contamination

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

Subsequently, Health Code Article 22A, also known as the Maher Ordinance, was expanded to include properties throughout the City where there is potential to encounter hazardous materials, primarily industrial zoning districts, sites with industrial uses or underground storage tanks, sites with historic bay fill, and sites in close proximity to freeways or underground storage tanks. The Maher Ordinance requires sponsors of projects that disturb more than 50 cubic yards of soil in a Maher Ordinance area enroll in the Maher Program with the Department of Public Health and 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 ESAs determine the potential for site contamination and level of exposure risk associated with the 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 agency(ies), and to remediate any site contamination in accordance with an approved SMP prior to the issuance of any building permit. The Maher Ordinance supersedes the site assessment and corrective action requirements of Western SoMa Mitigation Measure M-HZ-3: Site Assessment and Corrective Action. As such, PEIR Mitigation Measure M-HZ-3 does not apply to the proposed project.

The project site is located in a Maher Ordinance area and is adjacent to a property with an active leaking underground storage tank (LUST) case. The proposed project would include excavation to a maximum

depth of three feet below grade in order to accommodate the foundations for the proposed buildings and the new western entrance to the rectory, resulting in approximately 1,050 cubic yards of soil disturbance. Therefore, the project is subject to the Maher Ordinance.

In compliance with the Maher Ordinance, the project sponsor submitted a Maher Application to DPH⁴¹ and submitted a Phase I ESA for the project site.⁴² The Phase I ESA was prepared for the properties at 240, 250, and 260 10th Street and 1401 and 1415 Howard Street. The investigation found the following Recognized Environmental Conditions (REC)⁴³: (1) dry cleaning activities may have been performed at the project site; (2) an approximately 1,500-gallon heating oil underground storage tank (UST) was removed from the site in October 2007; (3) the project site is located in an area where fill soils were historically placed, and the source and quality of the fill material are unknown; (4) a dry well was observed on the building plans dated 1960 for the elementary school building (formerly St. Joseph’s Convent); (5) peeling, chipping, and blistering paint was observed on the exterior of the St. Joseph’s Church.⁴⁴ A Phase II ESA (subsurface investigation) was subsequently prepared for the project site⁴⁵ to determine if the identified RECs were significant. The Phase II ESA concluded there is no evidence of dry cleaning activities on the subject property, the UST was appropriately closed, and lead levels in the soil were below screening levels. The location of the dry well could not be verified. However, the investigation included soil sampling and analysis near the purported location of the dry well. The analysis revealed no evidence of chemicals associated with dry cleaning activities.

Pursuant to the Maher Ordinance, DPH will review the results of the Phase I and Phase II ESAs and determine if additional analysis is required. Should additional analysis reveal the presence of contaminated soil or groundwater, DPH would require the project sponsor to submit a SMP and remediate any contamination in accordance with Article 22A of the Health Code. Thus, the proposed project would not result in a significant hazard to the public or the environment through the release of hazardous materials.

For these reasons, the proposed project would not result in significant impacts related to hazards or hazardous materials that were not identified in the Western SoMa PEIR.

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
17. MINERAL AND ENERGY RESOURCES— Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

⁴¹ Project FOCUS, *Maher Program Application, Presidio Knolls School, 250 10th Street, San Francisco, California*, October 16, 2015.

⁴² Cornerstone Earth Group, *Phase I Environmental Site Assessment, Howard and 10th Street, San Francisco, CA*, November 30, 2007.

⁴³ Recognized Environmental Condition: The presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material release of any hazardous substances or petroleum products into structures on the property or into the ground, ground water, or surface water or the property.

⁴⁴ St. Joseph’s Church, located at 1401 Howard Street, was included in the Phase I ESA investigation, but is not a part of the project site.

⁴⁵ John Carver Consulting, *Phase II Soil & Groundwater Investigation, 220-260 10th Street, San Francisco, California*, September 2, 2011.

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

<u>Topics:</u>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
18. AGRICULTURE AND FOREST RESOURCES:—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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)) or timberland (as defined by Public Resources Code Section 4526)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

MITIGATION MEASURES

Project Mitigation Measure 1: Protect Historical Resources from Adjacent Construction Activities (Implementation of Mitigation Measure M-CP-7a of the Western SoMa PEIR)

The project sponsor shall consult with Planning Department environmental planning/preservation staff to determine whether adjacent or nearby buildings constitute historical resources that could be adversely affected by construction-generated vibration. For purposes of this measure, nearby historic buildings shall include those within 100 feet of a construction site if pile driving would be used in a subsequent development project; otherwise, it shall include historic buildings within 25 feet if heavy equipment would be used on the subsequent development project. (No measures need be applied if no heavy equipment would be employed.) If one or more historical resources is identified that could be adversely affected, the project sponsor shall incorporate into construction specifications for the proposed project a requirement that the construction contractor(s) use all feasible means to avoid damage to adjacent and nearby historic buildings. Such methods may include maintaining a safe distance between the construction site and the historic buildings (as identified by the Planning Department preservation staff), using construction techniques that reduce vibration, appropriate excavation shoring methods to prevent movement of adjacent structures, and providing adequate security to minimize risks of vandalism and fire.

Project Mitigation Measure 2: Construction Monitoring Program for Historical Resources (Implementation of Mitigation Measure M-CP-7b of the Western SoMa PEIR)

The project sponsor shall undertake a monitoring program to minimize damage to adjacent historic buildings and to ensure that any such damage is documented and repaired. The monitoring program, which shall apply within 100 feet where pile driving would be used and within 25 feet otherwise, shall include the following components. Prior to the start of any ground-disturbing activity, the project sponsor shall engage a historic architect or qualified historic preservation professional to undertake a preconstruction survey of historical resource(s) identified by the Planning Department within 125 feet of planned construction to document and photograph the buildings' existing conditions. Based on the construction and condition of the resource(s), the consultant shall also establish a maximum vibration level that shall not be exceeded at each building, based on existing condition, character-defining features, soils conditions, and anticipated construction practices (a common standard is 0.2 inch per second, peak particle velocity). To ensure that vibration levels do not exceed the established standard, the project sponsor shall monitor vibration levels at each structure and shall prohibit vibratory construction activities that generate vibration levels in excess of the standard.

Should vibration levels be observed in excess of the standard, construction shall be halted and alternative techniques put in practice, to the extent feasible. The consultant shall conduct regular periodic inspections of each building during ground-disturbing activity on the project site. Should damage to either building occur, the building(s) shall be remediated to its pre-construction condition at the conclusion of ground-disturbing activity on the site.

Project Mitigation Measure 3: Procedures for Accidental Discovery of Archeological Resources (Implementation of Mitigation Measure M-CP-4b of the Western SoMa PEIR)

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

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

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

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

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

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

Project Mitigation Measure 4: General Construction Noise Control Measures (Implementation of Mitigation Measure M-NO-2a of the Western SoMa PEIR)

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

- Require the general contractor to ensure that equipment and trucks used for project construction use the best available noise control techniques (e.g., improved mufflers, equipment redesign, and use of intake silencers, ducts, engine enclosures and acoustically attenuating shields or shrouds, wherever feasible).
- Require the general contractor to locate stationary noise sources (such as compressors) as far from adjacent or nearby sensitive receptors as possible, to muffle such noise sources, and to construct barriers around such sources and/or the construction site, which could reduce construction noise by as much as 5 dBA. To further reduce noise, the contractor shall locate stationary equipment in pit areas or excavated areas, if feasible.
- Require the general contractor to use impact tools (e.g., jack hammers, pavement breakers, and rock drills) that are hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used, along with external noise jackets on the tools, which could reduce noise levels by as much as 10 dBA.
- Include noise control requirements in specifications provided to construction contractors. Such requirements could include, but not be limited to: performing all work in a manner that minimizes noise to the extent feasible; undertaking the noisiest activities during times of least disturbance to surrounding residents and occupants, as feasible; and selecting haul routes that avoid residential buildings inasmuch as such routes are otherwise feasible.
- Prior to the issuance of each building permit, along with the submission of construction documents, the project sponsor shall submit to the San Francisco Planning Department and Department of Building Inspection (DBI) a list of measures to respond to and track complaints pertaining to construction noise. These measures shall include: (1) a procedure and phone numbers for notifying DBI, the Department of Public Health, and the Police Department (during regular construction hours and off-hours); (2) a sign posted on-site describing noise complaint procedures and a complaint hotline number that shall be answered at all times during construction; (3) designation of an on-site construction complaint and enforcement manager for

the project; and (4) notification of neighboring residents and non-residential building managers within 300 feet of the project construction area at least 30 days in advance of extreme noise-generating activities (defined as activities generating noise levels of 90 dBA or greater) about the estimated duration of the activity.

Project Mitigation Measure 5: Construction Emissions Minimization Plan for Health Risks and Hazards (Implementation of Mitigation Measure M-AQ-7 of the Western SoMa PEIR)

The project sponsor shall develop a Construction Emissions Minimization Plan for Health Risks and Hazards designed to reduce health risks from construction equipment to less-than-significant levels. The Plan shall detail project compliance with the following requirements:

1. All off-road equipment greater than 25 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities shall meet the following requirements:
 - a) Where access to alternative sources of power are available, portable diesel engines shall be prohibited;
 - b) All off-road equipment shall have:
 - i. Engines that meet or exceed either United States Environmental Protection Agency or California Air Resources Board (ARB) Tier 2 off-road emission standards, *and*
 - ii. Engines that are retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy (VDECS).⁴⁶
 - c) Exceptions:
 - i. Exceptions to A(1)(a) *may* be granted if the project sponsor has submitted information providing evidence to the satisfaction of the ERO that an alternative source of power is limited or infeasible at the project site and that the requirements of this exception provision apply. Under this circumstance, the sponsor shall submit documentation of compliance with A(1)(b) for onsite power generation.
 - ii. Exceptions to A(1)(b)(ii) *may* be granted if the project sponsor has submitted information providing evidence to the satisfaction of the ERO that a particular piece of off-road equipment with an ARB Level 3 VDECS is: (1) technically not feasible, (2) would not produce desired emissions reductions due to expected operating modes, (3) installing the control device would create a safety hazard or impaired visibility for the operator, or (4) there is a compelling emergency need to use off-road equipment that are not retrofitted with an ARB Level 3 VDECS and the sponsor has submitted documentation to the ERO that the requirements of this exception provision apply. If granted an exception to A(1)(b)(ii), the project sponsor must comply with the requirements of A(1)(c)(iii).
 - iii. If an exception is granted pursuant to A(1)(c)(ii), the project sponsor shall provide the next cleanest piece of off-road equipment as provided by the step down schedules in Table A1 below.

⁴⁶ Equipment with engines meeting Tier 4 Interim or Tier 4 Final emission standards automatically meet this requirement, therefore a VDECS would not be required.

TABLE: A1
OFF-ROAD EQUIPMENT COMPLIANCE STEP DOWN SCHEDULE*

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

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

**Alternative fuels are not a VDECS

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

2. The project sponsor shall require that construction operators properly maintain and tune equipment in accordance with manufacturer specifications.
3. The Plan shall include estimates of the construction timeline by phase with a description of each piece of off-road equipment required for every construction phase. Off-road equipment descriptions and information may include, but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For VDECS installed: technology type, serial number, make, model, manufacturer, ARB verification number level, and installation date and hour meter reading on installation date. For off-road equipment using alternative fuels, reporting shall indicate the type of alternative fuel being used.
4. The Plan shall be kept on-site and available for review by any persons requesting it and a legible sign shall be posted at the perimeter of the construction site indicating to the public the basic requirements of the Plan and a way to request a copy of the Plan. The project sponsor shall provide copies of Plan to members of the public as requested.

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

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

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

Project Mitigation Measure 6: Pre-Construction Special-Status Bird Surveys (Implementation of Mitigation Measure M-BI-1a of the Western SoMa PEIR)

The project sponsor shall conduct a preconstruction special-status bird survey when trees would be removed or buildings demolished as part of an individual project. Pre-construction special-status bird surveys shall be conducted by a qualified biologist between February 1 and August 15 if tree removal or building demolition is scheduled to take place during that period. If bird species protected under the Migratory Bird Treaty Act or the California Fish and Game Code are found to be nesting in or near any work area, an appropriate no-work buffer zone (e.g., 100 feet for songbirds) shall be designated by the biologist. Depending on the species involved, input from the California Department of Fish and Game (CDFG) and/or United States Fish and Wildlife Service (USFWS) may be warranted. As recommended by the biologist, no activities shall be conducted within the no-work buffer zone that could disrupt bird breeding. Outside of the breeding season (August 16 – January 31), or after young birds have fledged, as determined by the biologist, work activities may proceed. Special-status birds that establish nests during the construction period are considered habituated to such activity and no buffer shall be required, except as needed to avoid direct destruction of the nest, which would still be prohibited.

Project Mitigation Measure 7: Hazardous Building Materials Abatement (Implementation of Mitigation Measure M-HZ-2 of the Western SoMa PEIR)

The project sponsor shall ensure that any equipment containing polychlorinated biphenyls (PCBs) or mercury, such as fluorescent light ballasts, are removed and properly disposed of according to applicable federal, state, and local laws prior to the start of renovation, and that any fluorescent light tube fixtures, which could contain mercury, are similarly removed intact and properly disposed of. Any other hazardous materials identified, either before or during work, shall be abated according to applicable federal, state, and local laws.

IMPROVEMENT MEASURES

Project Improvement Measure 1: Transportation Management Plan (TMP)

The project sponsor has agreed to develop and implement a comprehensive Transportation Management Plan (TMP) as part of the proposed school expansion project. The overall purpose of the TMP is to provide guidelines for student drop-off and pick-up procedures and to improve the student drop-off and pick up operations and encourage the use of carpooling and alternative modes of transportation to reduce vehicle and parking demand. The elements of the TMP would include:

- Notify parents/guardians about current pick-up and drop-off procedures in writing and through orientations;

- Presidio Knolls School shall continue to require faculty/staff to directly assist in getting students out of the vehicle and into their respective on-site meeting place during drop-off activities and directly assist students from the on-site meeting place to the vehicle during pick-up activities.
- Establish a policy to prohibit parents/guardians from stopping in the school loading zone for longer than two (2) minutes;
- Install school zone signage on Howard Street near the proposed passenger loading zone to address speeding vehicles and help improve safety.
- Maintain a log (inventory) of complaints from neighbors and work with those neighbors to resolve unforeseen problems with student drop-off/pick-up activities, and maintain an ongoing, constructive relationship with the neighboring residents and businesses;
- Establish a monitoring program for the first year of the schools' expansion to conduct observations and circulation along 10th Street, Howard Street, and surrounding streets during student drop-off and pick-up activities. The monitoring reports shall be distributed to staff and parents/guardians up to three times during the academic school year (between September and June). Potential improvements and adjustments to the student drop-off and pick-up procedures and other related school operations should be conducted based on the monitoring reports.
- Post the TMP on the Presidio Knolls School website for public access to the document;
- Provide parents/guardians with the TMP as part of the enrollment application, orientation manual, and/or related information packet;
- Provide a detailed map of student drop-off and pick-up zones along 10th Street and Howard Street;
- Provide a detailed vehicle routing map to the Presidio Knolls School location;
- Provide parents/guardians with Multimodal Access Guide to describe how to reach the school by walking, bicycling, and transit. The guide will include:
 - A detailed map of nearby transit facilities (stops and routes) in vicinity of the proposed school;
 - A detailed map of bicycle routes in the vicinity of the proposed school; and
 - Provide online links and phone numbers to transit providers that serve the proposed Presidio Knolls School site.
- Encourage parent/guardians to utilize on-street parking in the immediate vicinity of the proposed school for long-term parking;
- Enforce parents/guardians to not exit their vehicles and enter the school while stopped/parked at the loading zone;
- Develop a volunteer carpooling program for parents/guardians; and
- Appoint a Transportation Management Coordinator who is in charge of overseeing the implementation of TMP as well as various programs that encourage the use of alternative mode of transportation.
 - The Transportation Management Coordinator would establish mode split goals for Presidio Knolls School staff members and students, and monitor progress each year; and
 - The Transportation Management Coordinator would periodically survey parents/guardians and faculty/staff to determine travel patterns, reasons for travel choices, barriers and potential opportunities for change.

Project Improvement Measure 2: Construction Management Plan

The construction contractor(s) has agreed to develop a detailed Construction Management Plan. The Construction Management Plan would, at a minimum, include the following provisions:

- Circulation routes shall be developed to minimize impacts on local street circulation, as appropriate. In the event of parking and/or travel lane closures, flaggers or signs or both shall be used to guide vehicles through or around the construction zone. Roadside construction safety protocols shall be implemented.
- Truck routes shall be identified. Haul routes that minimize truck traffic on local roadways and residential streets shall be used to the extent possible.
- Sufficient staging areas shall be developed for trucks accessing construction zones so as to minimize disruption of access to adjacent land uses, particularly at entries to the project site.
- Construction vehicle movement shall be controlled and monitored by on-site inspectors enforcing standard construction specifications.
- Truck trips shall be scheduled outside the peak morning and evening commute hours, to the extent possible.
- All equipment and materials shall be stored in designated contractor staging areas on or next to the worksite to the extent possible, such that vehicle, pedestrian, and bicycle traffic obstruction is minimized.
- Construction shall be coordinated with facility owners or administrators of police and fire stations (including all fire protection agencies) and transit stations or stops. Emergency service vehicles shall be given priority for access.
- The contractor shall be encouraged to reduce the number of construction workers' vehicle trips by facilitating the use of public transportation and minimizing construction worker parking availability.
- The contractor shall coordinate with other contractor(s) for projects in the vicinity and share information regarding schedule, duration of activities, vehicle routing and detouring (if applicable), staging of vehicles, etc.
- The contractor shall provide regularly-updated information (typically in the form of website, news articles, on-site posting, etc.) regarding project construction and schedule, as well as contact information for specific construction inquiries or concerns.

The Construction Management Plan shall be reviewed by the TAC to adequately address issues of circulation (traffic, pedestrians, and bicycle), safety, parking and other project construction in the area.

Project Improvement Measure 3: Night Lighting Minimization (Implementation of Improvement Measure I-BI-2 of the Western SoMa PEIR)

The project sponsor has agreed to implement bird-safe building operations to prevent and minimize bird strike impacts, including but not limited to the following measures:

- Reduce building lighting from exterior sources by:
 - Minimizing amount and visual impact of perimeter lighting and façade up-lighting and avoid up-lighting of rooftop antennae and other tall equipment, as well as of any decorative features;
 - Installing motion-sensor lighting; and
 - Utilizing minimum wattage fixtures to achieve required lighting levels.
- Reduce building lighting from interior sources by:
 - Dimming lights in lobbies, perimeter circulation areas, and atria;

- Turning off all unnecessary lighting by 11:00 p.m. through sunrise, especially during peak migration periods (mid-March to early June and late August through late October);
- Utilizing automatic controls (motion sensors, photo-sensors, etc.) to shut off lights in the evening when no one is present;
- Encouraging the use of localized task lighting to reduce the need for more extensive overhead lighting;
- Scheduling nightly maintenance to conclude by 11:00 p.m.; and
- Educating building users about the dangers of night lighting to birds.