Notice of Preparation of an Environmental Impact Report

Date: July 5, 2017
Case No.: 2014.0914E
Project Title: 1033 Polk Street Project
Project Address: 1033 - 1037 Polk Street
Zoning: RC-4 – Residential-Commercial, High Density
130-V Height and Bulk District
Van Ness Special Use District
Area Plan: Van Ness Avenue
Block/Lot: 0694/003
Lot Size: 2,200 square feet
Project Sponsor: LC Development Corporation
Neil Kaye (Natoma Architects, Inc.) – (415) 626-8977
NKaye@saitowitz.com
Staff Contact: Melinda Hue – (415) 575-9041
Melinda.Hue@sfgov.org

PROJECT DESCRIPTION

The 2,200 square-foot project site (Assessor’s Block 06949, Lot 003) is located on the northwest corner of Polk and Cedar Streets, and is within the Downtown/Civic Center neighborhood, in an area generally characterized by residential, retail, and commercial uses. The site is currently occupied by a two-story building, which is vacant, but formerly contained office, retail, and residential uses. The 1033 Polk Street building is eligible for listing on the California Register of Historical Resources and therefore is considered a historic resource.

The project sponsor, LC Development Corporation, proposes to demolish the existing building and construct a mixed-use building with ground-floor retail space with frontages along Polk and Cedar Streets, and residential space above. The proposed building would be eight stories tall, plus a mechanical penthouse and elevator penthouse, reaching approximately 85 feet in height (98 feet in height with parapet and rooftop equipment). The ground floor would contain approximately 445 gross square feet (gsf) of retail space, as well as the residential lobby and required mechanical space. The proposed project would include a total of 19 residential units, including 18 one-bedroom units and one two-bedroom unit, on the second to eighth floors. The proposed project would not provide off-street parking spaces. However, 19 bicycle parking spaces would be provided centrally on the ground floor of the building, with access from the residential lobby. Two Class 2 bicycle spaces would be provided adjacent to the
curb. Minor reconstruction of sidewalks along the project frontages would be necessary, and an existing curb cut along the Cedar Street frontage would be removed as a result of the proposed project. Three existing street trees along the Polk Street frontage would be retained, and an additional street tree would be planted along the Cedar Street frontage. Project construction would span approximately 16 months, with the demolition and shoring and grading phases each lasting approximately 1 month.

FINDING

This project may have a significant effect on the environment and an Environmental Impact Report (EIR) is required. This determination is based upon the criteria of the State California Environmental Quality Act (CEQA) Guidelines, Sections 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and for the reasons documented in the Environmental Evaluation (Initial Study) for the project, which is attached.

ALTERNATIVES

Alternatives to be considered for this project will include, but not be limited to, the No Project Alternative and one or more alternatives that preserve all or most of the historic structure at 1033 Polk Street. This determination is based upon the criteria of the State CEQA Guidelines, Section 15126.6 (Consideration and Discussion of Alternatives to the Proposed Project).

PUBLIC SCOPING PROCESS

Written comments will be accepted until 5:00 p.m. on August 4, 2017. Written comments should be sent to Melinda Hue, Environmental Planner, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, 94103, or melinda.hue@sfgov.org.

If you work for a responsible state agency, we need to know the views of your agency regarding the scope and content of the environmental information that is germane to your agency’s statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project. Please include the name of a contact person in your agency.

Date 7/5/2017

Lisa Gibson
Environmental Review Officer
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<th>Description</th>
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</thead>
<tbody>
<tr>
<td>ABAG</td>
<td>Association of Bay Area Governments</td>
</tr>
<tr>
<td>ACL</td>
<td>Absolute Cumulative Limits</td>
</tr>
<tr>
<td>ARB</td>
<td>Air Resources Board</td>
</tr>
<tr>
<td>BAAQMD</td>
<td>Bay Area Air Quality Management District</td>
</tr>
<tr>
<td>BART</td>
<td>Bay Area Rapid Transit</td>
</tr>
<tr>
<td>bgs</td>
<td>below ground surface</td>
</tr>
<tr>
<td>BMR</td>
<td>Below Market Rates</td>
</tr>
<tr>
<td>CAA</td>
<td>Clean Air Act</td>
</tr>
<tr>
<td>CAP</td>
<td>Clean Air Plan</td>
</tr>
<tr>
<td>CCAA</td>
<td>California Clean Air Act</td>
</tr>
<tr>
<td>CEQA</td>
<td>California Environmental Quality Act</td>
</tr>
<tr>
<td>CO</td>
<td>carbon monoxide</td>
</tr>
<tr>
<td>DBI</td>
<td>Department of Building Inspection</td>
</tr>
<tr>
<td>DPM</td>
<td>diesel particulate matter</td>
</tr>
<tr>
<td>DPW</td>
<td>Department of Public Works</td>
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<tr>
<td>EIR</td>
<td>Environmental Impact Statement</td>
</tr>
<tr>
<td>ESA</td>
<td>Environmental Site Assessment</td>
</tr>
<tr>
<td>GHG</td>
<td>Greenhouse gas</td>
</tr>
<tr>
<td>gsf</td>
<td>gross square feet</td>
</tr>
<tr>
<td>lbs</td>
<td>pounds</td>
</tr>
<tr>
<td>MBTA</td>
<td>Migratory Bird Treaty Act</td>
</tr>
<tr>
<td>mph</td>
<td>miles per hour</td>
</tr>
<tr>
<td>MRZ</td>
<td>Mineral Resource Zone</td>
</tr>
<tr>
<td>NESHAP</td>
<td>National Emissions Standards for Hazardous Air Pollutants</td>
</tr>
<tr>
<td>NOP</td>
<td>Notice of Preparation</td>
</tr>
<tr>
<td>NOx</td>
<td>oxides of nitrogen</td>
</tr>
<tr>
<td>NO2</td>
<td>nitrogen dioxide</td>
</tr>
<tr>
<td>NPDES</td>
<td>National Pollutant Discharge Elimination System</td>
</tr>
<tr>
<td>OPR</td>
<td>Office of Planning and Research</td>
</tr>
<tr>
<td>PCBs</td>
<td>polychlorinated biphenyls</td>
</tr>
<tr>
<td>PM</td>
<td>particulate matter</td>
</tr>
<tr>
<td>RC</td>
<td>Residential Commercial</td>
</tr>
<tr>
<td>ROG</td>
<td>Reactive organic gases</td>
</tr>
<tr>
<td>ROSE</td>
<td>Recreation and Open Space Element</td>
</tr>
<tr>
<td>RWQCB</td>
<td>Regional Water Quality Control Board</td>
</tr>
<tr>
<td>SB</td>
<td>Senate Bill</td>
</tr>
<tr>
<td>sf</td>
<td>square foot</td>
</tr>
<tr>
<td>SFBAAB</td>
<td>San Francisco Bay Area Air Basin</td>
</tr>
<tr>
<td>SFDPH</td>
<td>San Francisco Department of Public Health</td>
</tr>
<tr>
<td>SFFD</td>
<td>San Francisco Fire Department</td>
</tr>
<tr>
<td>SFPD</td>
<td>San Francisco Police Department</td>
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<tr>
<td>SFPUU</td>
<td>San Francisco Public Utilities Commission</td>
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<td>SFUSD</td>
<td>San Francisco Unified School District</td>
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<tr>
<td>SF-CAMP</td>
<td>San Francisco Chained Activity Model Process</td>
</tr>
<tr>
<td>SMP</td>
<td>site mitigation plan</td>
</tr>
<tr>
<td>SO2</td>
<td>sulfur dioxide</td>
</tr>
<tr>
<td>SWPPP</td>
<td>Stormwater Pollution Prevention Plan</td>
</tr>
<tr>
<td>TAAS</td>
<td>Theoretically Available Annual Sunlight</td>
</tr>
<tr>
<td>TAC(s)</td>
<td>toxic air contaminant(s)</td>
</tr>
<tr>
<td>Abbreviation</td>
<td>Description</td>
</tr>
<tr>
<td>--------------</td>
<td>------------------------------------------</td>
</tr>
<tr>
<td>TAZ</td>
<td>transportation analysis zone</td>
</tr>
<tr>
<td>TCR</td>
<td>Tribal Cultural Resources</td>
</tr>
<tr>
<td>USEPA</td>
<td>US Environmental Protection Agency</td>
</tr>
<tr>
<td>VMT</td>
<td>vehicle miles traveled</td>
</tr>
<tr>
<td>VOC(s)</td>
<td>Volatile organic compound(s)</td>
</tr>
</tbody>
</table>
A. PROJECT DESCRIPTION

A.1. PROJECT LOCATION AND SITE CHARACTERISTICS

The project site is within the Downtown/Civic Center Neighborhood, in an area generally characterized by residential, retail, and commercial uses. The project site consists of an approximately 2,200 square-foot (sf) parcel (Assessor’s Block 06949, Lot 003), on the northwest corner of Polk and Cedar Streets. The project site has frontages on both Polk and Cedar Streets (see Figure 1, Project Location). The project site is bounded by Polk Street to the east, Cedar Street to the south, an existing five-story building to the west, and an existing two-story building to the north.

The project site is zoned as RC-4 (Residential Commercial High Density), and is also within the Van Ness Special Use District, a 130-V Height and Bulk District, and the Van Ness Avenue Area Plan boundaries.

Existing Building and Uses on the Project Site

The site currently contains a single two-story residential mixed-use building that is approximately 4,400 gross-square-feet (gsf). The existing building, currently vacant, was most recently occupied with approximately 1,875 gsf of office space, and 1,300 gsf of retail space, as well as a residence on the second floor. The existing building is 33 feet tall (see Figure 2, Existing Site). The project site currently does not include any vehicle parking spaces.

The existing building was constructed in 1920, and was originally used as an automobile parts and supplies store during the 1920s and 1930s. The existing building was previously determined to be eligible for listing on the California Register of Historical Resources, and therefore, is considered a historic resource.

A.2. PROJECT CHARACTERISTICS

The project sponsor, LC Development Corporation, proposes to demolish the existing building and construct a mixed-use building with ground-floor retail space with frontages along Polk and Cedar Streets, and residential uses above. The proposed building would be eight stories tall, plus a mechanical penthouse and elevator penthouse, reaching approximately 85 feet in height (98 feet in height with parapet and rooftop equipment).
1033 POLK STREET PROJECT
Case No. 2014.9014E

FIGURE 1: PROJECT SITE LOCATION

source: City and County of San Francisco Planning Department
1033 POLK STREET PROJECT

Case No. 2014.0914E

FIGURE NOT TO SCALE

SOURCE: NATOMA ARCHITECTS Inc.

FIGURE 2: EXISTING SITE

EXISTING SITE

1033 POLK ST.
2 STORY
EXISTING BLDG.
29'

CEDAR ST
The ground floor would contain approximately 445 gsf of retail space, as well as the residential lobby and required mechanical space (see Figure 3, Level 1 Proposed Plan). Retail space would be in the southeast building corner on the ground floor, with access along the Polk Street frontage. The proposed project would include 14,357 gsf of residential space, with an additional approximately 1,000 gsf of common residential open space located on the roof level for use by building residents. The proposed project would have a total of 19 residential units, including 18 one-bedroom units and one two-bedroom unit. Residential units would be above retail space (see Figure 4, Levels 2 through 7 Proposed Plan). Of the 19 total residential units 17 would be at market rate, while two units (or 12 percent of the total) would be below market rate (BMR). The project would include 19 bicycle parking spaces in a ground-floor room, accessible from the residential lobby, and two Class 2 stalls adjacent to the curb. The proposed project would not provide off-street parking. Minor reconstruction of sidewalks along the project frontages would be necessary, and an existing curb cut along the Cedar Street frontage would be removed as a result of the proposed project. Three existing street trees along the Polk Street frontage would be retained, and an additional street tree would be planted along the Cedar Street frontage.

Project uses and space are listed in Table 1, Project Summary. Proposed elevations are depicted in Figure 5, Proposed West and South Elevations, and Figure 6, Proposed East and North Elevations.

**TABLE 1: PROJECT SUMMARY**

<table>
<thead>
<tr>
<th>Project Use/Space</th>
<th>Project Totals</th>
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</thead>
<tbody>
<tr>
<td>Lot Size (sf)</td>
<td>2,200</td>
</tr>
<tr>
<td>Residential</td>
<td>14,357</td>
</tr>
<tr>
<td>Common residential open space</td>
<td>1,000 (excluded from gsf)</td>
</tr>
<tr>
<td>Retail</td>
<td>445</td>
</tr>
<tr>
<td>Parking/Loading</td>
<td>0</td>
</tr>
<tr>
<td>Other (Residential Lobby/Mechanical)</td>
<td>2,240</td>
</tr>
<tr>
<td><strong>Total (gsf)</strong></td>
<td><strong>17,042</strong></td>
</tr>
<tr>
<td>Dwelling Units</td>
<td>19</td>
</tr>
<tr>
<td>Number of building(s)</td>
<td>1</td>
</tr>
<tr>
<td>Height of building(s) (feet)</td>
<td>85 (98 feet in height with parapet and rooftop equipment)</td>
</tr>
<tr>
<td>Number of stories</td>
<td>8</td>
</tr>
<tr>
<td>Bicycle parking spaces</td>
<td>19 Class 1 and 2 Class 2</td>
</tr>
</tbody>
</table>

Source: LC Development Corporation

Notes:
1 Parapet, mechanical penthouses, and other associated rooftop building structures are exempt from overall building height pursuant to Planning Code Section 260(b)(1)(F).
Project construction is anticipated to occur over 16 months, including demolition, excavation, site preparation, and construction phases. Table 2, Construction Schedule shows the approximate schedule of project development by phase. The proposed project would require excavation to a depth of approximately four feet below ground surface (bgs) to accommodate necessary foundation work. Excavation would result in the removal of approximately 325 cubic yards of soil. The proposed project would not include diesel-powered emergency electric generators.

**TABLE 2: CONSTRUCTION SCHEDULE**

<table>
<thead>
<tr>
<th>Construction Activity</th>
<th>Approximate Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td>Demolition</td>
<td>1 month</td>
</tr>
<tr>
<td>Excavation and Shoring</td>
<td>1 month</td>
</tr>
<tr>
<td>Construction</td>
<td>14 months</td>
</tr>
</tbody>
</table>

**A.3. REQUIRED APPROVALS AND PERMITS**

The proposed 1033 Polk Street project would require the following approvals from the City and County of San Francisco:

- Conditional Use Authorization by the Planning Commission pursuant to Planning Code Section 253.2(a) for a building exceeding a height of 50 feet in the Van Ness Special Use District.

- Planning Commission may require special building setbacks for a project on a narrow street within the Van Ness Special Use District pursuant to Planning Code Section 252.2(3).

- If sidewalk(s) are used for construction staging and pedestrian walkways are constructed in the curb lane, the project would require a special traffic permit from the Municipal Transportation Agency Sustainable Streets Division (and a street space permit from the Bureau of Street Use and Mapping of the Department of Public Works [DPW]).

- Department of Building Inspection approval for demolition and building permits.

- Public Utilities Commission approval for the Stormwater Pollution Prevention Plan (SWPPP).

- Planning Commission approval of Section 317 Dwelling Unit Removal application for the demolition of a vacant residential unit in the existing building.
1033 POLK STREET PROJECT

Case No. 2014.0914E

FIGURE 4: LEVEL 2 THROUGH 7 PROPOSED PLAN

SOURCE: NATOMA ARCHITECTS Inc.
FIGURE 5: PROPOSED WEST AND SOUTH ELEVATIONS
FIGURE 6: PROPOSED EAST AND NORTH ELEVATIONS

SOURCE: NATOMA ARCHITECTS Inc.
B. Project Setting

As noted previously, the proposed project site is within the Downtown/Civic Center Neighborhood, and consists of a single lot that is occupied by a vacant two-story residential mixed-use building. The topography of the site and the surrounding vicinity is generally flat with a gentle north to south slope. The project site is bounded by Polk Street to the east, Cedar Street to the south, a five-story commercial/residential building to the west, and a two-story commercial building to the north.

The project site is within the Van Ness Avenue Area Plan, and is zoned as RC-4 (Residential Commercial), and is also within the Van Ness Special Use District, and 130-V Height and Bulk District. Surrounding the project site, land uses consist primarily of mixed-use residential-commercial/retail buildings, with commercial/retail typically on the ground floor, and high-density residential buildings. Other uses common in the area include hotel, entertainment, and some office uses. Along the east side of Polk Street across from the project site, the buildings are generally mixed-use with retail uses on the ground floor and residential or hotel uses above. Buildings along the south side of Cedar Street are predominantly residential uses. The majority of the buildings in the project vicinity are three stories or greater, compared to the existing two-story building on the project site.

Major roadways in the project vicinity providing site access include Polk Street (along the project frontage), California Street, Van Ness Avenue (U.S. 101), and Interstate 80 (I-80). Muni bus lines in the area include the following routes: 19 along Polk Street, 47 and 49 along Van Ness Avenue, 2 and 3 along Post, Geary, and Sutter Streets, and 38 along Geary and O’Farrell Streets.

Other available transit include the Muni California Street cable car from Market Street to Van Ness Avenue four blocks north of the project site. Bay Area Rapid Transit (BART) and Muni Metro subway lines also serve the area, at the Civic Center station, approximately 0.75 mile southeast on Market Street.

The nearest park/open space facility to the project site is the Sergeant John Macaulay Park, approximately 0.1 mile southeast of the project site at Larkin and O’Farrell Streets.

B.1. Cumulative Projects

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

- **1177 Polk Street**: demolition of the existing building; construction of mixed-use building with retail space on first floor and 5 floors of residential space above, consisting of 54 studio apartments. The project would also include modification of existing basement to create below-grade parking.

- **1200 Van Ness Avenue**: construction of 130-foot-high, 13-story, 272,796 gsf mixed-use (medical office/residential) building, with a five-story below-grade parking garage for 357 cars. The building would contain five floors of office space, with eight floors of residential space above including 84 dwelling units (50 one-bedroom and 34 two-bedroom).

- **1001 Van Ness Avenue**: demolition of an existing 89,498 sf commercial office building, and construction of a new mixed-use (multi-family residential over retail) building with 256 residential units and 5,000 sf of retail.

- **1525 Pine Street**: demolition of an existing one-story restaurant; and construction of a new seven-story mixed-use commercial and residential building, with two commercial spaces on the ground floor, and 28 residential units above.

- **1244 Larkin Street**: vertical addition of two stories to the existing building. Proposed uses would be retail/parking on the ground level, medical office on the second level, and residential units on the upper floors.

- **719 Larkin Street**: demolition of the existing one-story over basement commercial building, and construct a new mixed-use, eight-story building consisting of a basement-level storage and residential parking garage, 1,400 sf of ground-floor retail, and 42 residential units.

- **1433 Bush Street**: demolition of the existing one-story commercial building and construction of an 11-story, 117-foot-tall building containing 2,200 sf of ground-floor commercial space, 50 residential units, and 14 vehicle parking spaces.

- **830 Eddy Street**: construction of a 15-story building with 126 residential units, including 22 studios, 65 one-bedroom units, 38 two-bedroom units, one three-bedroom unit, and 105 underground parking spaces.

- **1055 Geary Boulevard**: demolition of a two-story building, merger of existing two lots at the site to create a planned unit development, and construction of a 12-story, 120-unit residential building with 48 studio units and 72 one-bedroom units.

- **1238 Sutter Street**: demolition of an existing retail building, and construction of a nine-story mixed-use commercial and residential building with ground-floor commercial space and residential parking, and 37 residential units.

- **824 Hyde Street**: construction of a six-story, 30-room hotel that would be 69 feet tall.
Please see Figure 7, Cumulative Projects, for the locations of the listed projects. The project list provides information on overall development patterns in the proposed project vicinity. For analysis of potential cumulative effects, each environmental topic herein briefly identifies the cumulative context relevant to that topic. For example, the context would be nearby projects that could contribute to cumulative shadow effects on open space. In other cases, such as air quality, the context would be citywide or regional growth projects.
FIGURE 7: CUMULATIVE PROJECTS

Source: TRC Solutions, City and County of San Francisco

1033 Polk Street Project

Case No. 2014.0914E

1033 Polk Street Project
Cumulative Projects
C. Compatibility with Existing Zoning and Plans

<table>
<thead>
<tr>
<th></th>
<th>Applicable</th>
<th>Not Applicable</th>
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<tr>
<td>Discuss any variances, special authorizations, or changes proposed to the Planning Code or Zoning Map, if applicable.</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>Discuss any conflicts with any adopted plans and goals of the City or region, if applicable.</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection, or from regional, state, or federal agencies.</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

C.1. San Francisco Planning Code

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

**Allowable Uses**

The 1033 Polk Street site is zoned as RC-4 – Residential Commercial High Density, and is also within the Van Ness Special Use District and Van Ness Avenue Area Plan boundary. The RC-4 district covers the western portions of downtown and is composed of a variety of uses, including retail, hotels, entertainment, clubs and institutions, and high-density residential. Many of these uses have a citywide or regional function, although the intensity of development is lower in this district than in the downtown core area. As in the case of other downtown districts, no off-street parking is required for individual commercial buildings. The RC-4 district also provides easy access to several modes of transit throughout the district. The proposed project would develop approximately 19,231 gsf of residential and retail uses on the site, which are permitted uses in the RC-4 district.

**Affordable Housing**

The proposed project would comply with the City’s Residential Inclusionary Affordable Housing Program requirements (City Planning Code Section 415), by including two BMR units, or 12 percent of the total number of units, as required by Planning Code Section 415.6.
**HEIGHT AND BULK**

The project site is within a 130-V Height and Bulk District. This district allows for a maximum building height of 130 feet. However, the project site is within the Van Ness Special Use District, which requires any new construction or alteration that would cause a structure to exceed 50 feet in height to obtain conditional use approval from the Planning Commission pursuant to Planning Code Section 253.2(a). The eight-story, 85-foot building would meet the existing 130-V Height limit requirement upon obtaining conditional use authorization. Bulk limits within the 130-V Height and Bulk District include a maximum of 110 feet in length and 140 feet in diagonal dimension. However, the Van Ness Special Use District also includes special bulk requirements for developments or alterations exceeding 50 feet in height, and could require special setback requirements pursuant to Planning Code Section 253.2(3), for a project that is on a narrow street or alley, such as Cedar Street.

Overall, the proposed project uses would be consistent with the existing San Francisco Planning Code controls. The project design and dimensions would be subject to Planning Commission review under the Van Ness Special Use District controls. The physical environmental impacts of the proposed project uses and design are analyzed in this Initial Study.

**STREET TREES**

Planning Code Section 138.1(c)(1) requires that for every 20 feet of property frontage along each street, one 24-inch box tree be planted, with any remaining fraction of 10 feet or more of frontage requiring an additional tree. The proposed project would include a 40-foot frontage along Polk Street and a 55-foot frontage along Cedar Street. The proposed project would require five street trees, and would comply with Section 138.1(c)(1) by retaining or replanting the four existing trees on the site frontages, and planting an additional tree along the Cedar Street frontage.

**REAR YARD REQUIREMENTS**

Planning Code Section 134 requires a rear yard equivalent to 25 percent of total lot depth at all residential levels. The proposed project would provide common open space on the roof level, with approximately 1,000 gsf of shared, private open space, for use by building residents and their guests. No additional private open space would be provided. The proposed project would not provide open space within a rear yard and therefore, the project sponsor is requesting an exception to the rear yard requirements of Planning Code Section 134(e), pursuant to the procedures of Section 309, to allow for open space in a configuration other than a rear yard.
PARKING AND LOADING

In the Van Ness Avenue Special Use District and the RC-4 zoning district, no off-street parking is required for individual commercial buildings. Furthermore, Planning Code Section 151.1 stipulates off-street accessory parking shall not be required for any use within the Van Ness Avenue Special Use District. Therefore, the proposed project would not require an exception under Planning Code Section 151 for no inclusion of off-street parking. The proposed project would not provide off-street parking, but on-street parking and off-street parking garages are available in the surrounding area.

Planning Code Section 155.2 requires one secure (Class 1) bicycle parking space (bicycle locker or space in a secure room) be provided for each unit of new residential buildings, and that a minimum of one Class 2 space be provided for every 20 units. The project would include 19 Class 1 bicycle parking spaces in a secure ground-floor room, accessible from the residential lobby, and two Class 2 spaces, exceeding Section 155.2 requirements.

Planning Code Section 152.1 does not require off-street loading for residential buildings of less than 100,000 sf or retail uses of less than 10,000 sf. Therefore, the proposed project would not be required to provide off-street loading spaces, and none are proposed. An on-street metered loading zone is currently located on the project frontage on Polk Street, which could be used for loading.

C.2. SAN FRANCISCO GENERAL PLAN

The General Plan provides general policies and objectives to guide land use decisions, and contains some policies that relate to physical environmental issues. The General Plan contains 10 elements (Housing, Commerce and Industry, Recreation and Open Space, Transportation, Urban Design, Environmental Protection, Community Facilities, Community Safety, Arts, and Air Quality) that set forth goals, policies, and objectives for the physical development of the City. Any conflict between the proposed project and policies that relate to physical environmental issues are discussed in Section E, Evaluation of Environmental Effects. Decision-makers will consider the compatibility of the proposed project with General Plan policies that do not relate to physical environmental issues as part of their determination whether to approve or disapprove the proposed project. The General Plan also contains a number of area plans, which provide more specific policy direction for certain neighborhoods, primarily on the east side of the City. The proposed project falls within the Van Ness Avenue Area Plan.

Demolition of the existing building, which is eligible for listing on the California Register of Historical Resources, and therefore, is designated as a historic resource, could conflict with Policy 2.4 of the Urban
Design Element, which calls for the preservation of notable landmarks and areas of historic, architectural, or aesthetic value. Potential conflicts are discussed in Section E, Evaluation of Environmental Effects.

**Van Ness Avenue Area Plan**

The aim of the Van Ness Avenue Area Plan (area plan) is to facilitate the development of the Van Ness corridor into a thriving residential and commercial area. The area plan aims to add significant new housing, encouraging development of high density housing above commercial uses. The area plan also seeks to transform the area into an attractive gateway, providing circulation and functioning as a residential boulevard. The proposed project falls within those goals as it will provide an additional supply of high density housing to the Van Ness Avenue corridor. The project, being a mixed-use development with residential housing above commercial space will contribute to the goals of the Van Ness Avenue Area Plan. The proposed project is within an area serviced by multiple transit modes, which would facilitate circulation for the new residential/commercial development.

**C.3. Proposition M – The Accountable Planning Initiative**

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

Prior to issuing a permit for any project that requires an Initial Study under the CEQA; prior to issuing a permit for any demolition, conversion, or change of use; and prior to taking any action that requires a finding of consistency with the General Plan, the City is required to find that the proposed project would be consistent with the Priority Policies.
As noted previously, the compatibility of the proposed project with General Plan objectives and policies that do not relate to physical environmental issues will be considered by decision-makers as part of their determination whether to approve or disapprove the proposed project. Any potential conflicts identified as part of the process would not alter the physical environmental effects of the proposed project.

C.4. REGIONAL PLANS AND POLICIES

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

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

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

D.1. APPROACH TO ENVIRONMENTAL REVIEW

The Initial Study examines the proposed project to identify potential effects on the environment. For each item on the Initial Study checklist, the evaluation has considered the impacts of the proposed project both individually and cumulatively, with the exception of Air Quality and GHG, which are only considered on a cumulative basis.

Effects found to be potentially significant

The designation of topics as “Potentially Significant” in the Initial Study means that the EIR will consider the topic in greater depth and determine whether the impact would be significant. On the basis of this Initial Study, topics for which there are project-specific effects that have been determined to be potentially significant are related to Cultural Resources (historical architectural resources only) and Land Use (potential conflict with General Plan Policy 2.4 of the Urban Design Element). Historical architectural resources and land use impacts will be evaluated in the EIR prepared for the proposed project.

Effects found not to be significant

All items on the Initial Study Checklist that have been checked “Less-than-Significant Impact with Mitigation Incorporated,” “Less-than-Significant Impact,” “No Impact,” or “Not Applicable,” indicate that, upon evaluation, staff has determined that the proposed project could not have a significant adverse environmental effect relating to that issue. A discussion is included for those issues checked “Less-than-
D. Summary of Environmental Effects

Significant Impact with Mitigation Incorporated” and “Less-than-Significant Impact” and for most items checked “No Impact” or “Not Applicable.” For all of the items checked “No Impact” or “Not Applicable” without discussion, the conclusions regarding potential significant adverse environmental effects are based upon field observation, staff experience, and expertise on similar projects, and/or standard reference material available within the Planning Department, such as the Transportation Impact Analysis Guidelines for Environmental Review, or the California Natural Diversity Database and maps, published by the California Department of Fish and Wildlife. The topics for which the project was determined not to have potentially significant impacts include:

- Aesthetics
- Population and Housing
- Transportation and Circulation
- Noise
- Air Quality
- Greenhouse Gas Emissions
- Wind and Shadow
- Recreation
- Utilities and Service Systems
- Public Services
- Biological Resources
- Geology and Soils
- Hydrology and Water Quality
- Hazards and Hazardous Materials
- Mineral and Energy Resources
- Agricultural and Forest Resources

D.2. CEQA SECTION 21099

Aesthetics and Parking Analysis

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

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

The proposed project meets each of the three criteria, and thus, this Initial Study does not consider aesthetics and the adequacy of parking in determining the significance of project impacts under CEQA.\(^1\)

In addition, CEQA Section 21099(d)(2) states that a Lead Agency maintains the authority to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers and that aesthetics impacts do not include impacts on historical or cultural resources (e.g., historic architectural resources). As such, the Planning Department does consider aesthetics for design review and to evaluate effects on historic and cultural resources.

**Automobile Delay and Vehicle Miles Traveled Analysis**

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

In January 2016, OPR published for public review and comment a *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*\(^2\) recommending that transportation impacts for projects be measured using a vehicle miles traveled (VMT) metric. On March 3, 2016, based on compelling evidence in that document and on the City’s independent review of the literature on LOS and VMT, the San Francisco Planning Commission adopted OPR’s recommendation to use the VMT metric instead of automobile delay to evaluate the transportation impacts of projects (Resolution 19579).

Accordingly, this Initial Study does not contain a discussion of automobile delay impacts. Instead, a VMT and induced automobile travel impact analysis is provided in Section E.4, Transportation and Circulation. The topic of automobile delay, nonetheless, may be considered by decision-makers, independent of the

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1. San Francisco Planning Department, Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis, 1033 Polk Street, Case No. 2014.0914E, March 28, 2017. This document is available for public review at the Planning Department, 1650 Mission Street, Suite 400.
2. This document is available online at: https://www.opr.ca.gov/s_sb743.php.
environmental review process, as part of their decision to approve, modify, or disapprove the proposed project.
E. EVALUATION OF ENVIRONMENTAL EFFECTS

E.1. LAND USE AND LAND USE PLANNING

<table>
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<tr>
<th>Topics: LAND USE AND LAND USE PLANNING –</th>
<th>Potentially Significant Impact</th>
<th>Less-than-Significant Impact with Mitigation Incorporated</th>
<th>Less-than-Significant Impact</th>
<th>No Impact</th>
<th>Not Applicable</th>
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<td>Would the project:</td>
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<td>a) Physically divide an established community?</td>
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<td>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?</td>
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Impact LU-1: The proposed project would not physically divide an established community. (Less than Significant)

As discussed in Section A, Project Description, the proposed project site is within the Downtown/Civic Center neighborhood. The project site is composed of a single lot that includes a mixed-use building that is currently vacant. The most recent uses of the building included ground-floor office space with a residential unit above. The proposed project site is bounded by Polk Street to the east, Cedar Street to the south, a five-story mixed-use building to the west, and a two-story mixed-use building to the north. The proposed project would include the demolition of the existing structure and the construction of a new mixed-use building with residential and retail uses encompassing the entire lot. The proposed eight-story project would be approximately 85 feet tall (98 feet in height with parapet and rooftop equipment).

The existing building is vacant, and the proposed project would intensify the use of the project site. The proposed project would not alter the general land use pattern of the immediate area, which already includes high-density residential buildings, and mixed-use buildings with ground-floor commercial/retail uses with residential uses above. The buildings in the project vicinity vary in height ranging from two to eight stories. The project site is bounded by a five-story building to the west and a two-story building to the north. The proposed eight-story building would be within the range of building heights in vicinity.
The proposed project would not disrupt or divide the physical arrangement of existing uses adjacent to the project site or impede the passage of persons or vehicles. Those surrounding uses would be expected to continue in operation and relate to each other as they do presently, without disruption from the proposed project. Access to the new building would remain along Polk Street. The proposed project would replace an existing building at its current location, and therefore, would not result in a new physical barrier to neighborhood access, such as a new freeway, or remove a means of access, such as a bridge or roadway. Therefore, the proposed project would not physically divide an established community and a less-than-significant impact would result.

Impact LU-2: The proposed project could conflict with applicable land use plans, policies, or regulations (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. (Potentially Significant Impact)

Land use impacts would be considered significant if the proposed project would conflict with any plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Environmental plans and policies are those, like the BAAQMD Bay Area 2010 Clean Air Plan (2010 Clean Air Plan), which directly address environmental issues and/or contain targets or standards that must be met in order to preserve or improve characteristics of the City’s physical environment. The proposed project would not substantially conflict with any applicable land use plan, policy, or regulation such that an adverse physical change would result (see Section C, Compatibility with Existing Zoning and Plans). Furthermore, the proposed project would not conflict with the San Francisco General Plan (General Plan) policies that relate to physical environmental issues.

The General Plan contains objectives and policies that guide land use decisions, as well as some objectives and policies that relate to physical environmental issues. As identified in Section C, Compatibility with Existing Zoning and Plans (page 14), demolition of the existing building could conflict with the policies identified in the Urban Design Element of the General Plan and the Accountable Planning Initiative. Policy 2.4 of the Urban Design Element calls for the preservation of notable landmarks and areas of historic, architectural, or aesthetic value. The physical environmental impacts that could result from these potential conflicts will be discussed in the EIR. To the extent that the proposed project conflicts with any General Plan objectives and policies that do not relate to physical environmental issues, those conflicts would be considered by the decision-makers as part of their decision to approve or disapprove the proposed project.
Impact C-LU-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the project site, would not result in significant cumulative impacts related to land use. (Potentially Significant Impact)

Cumulative developments in the project vicinity (within a 0.25-mile radius of the project site) that are either under construction or for which the Planning Department has an Environmental Evaluation Application on file are listed and discussed in Section B.1, Cumulative Projects.

Cumulative development projects located within the vicinity of the project site would result in minor intensification of land uses in the project vicinity, similar to the proposed project; however, they would be infill projects that would not physically divide an established community by constructing a physical barrier to neighborhood access, such as a new freeway, or remove a means of access, such as a bridge or roadway.

The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a considerable cumulative land use impact other than the historic preservation policy of the Urban Design Element of the General Plan. Thus, the cumulative impacts that could result from this potential conflict will be discussed in the EIR.
E. Evaluation of Environmental Effects

E.2. POPULATION AND HOUSING

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<tr>
<th>Topics:</th>
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<th>No Impact</th>
<th>Not Applicable</th>
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POPULATION AND HOUSING – Would the project:

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

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

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

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

In general, a project would be considered growth-inducing if its implementation would result in substantial population increases and/or new development that might not occur if the project were not approved and implemented. The proposed project would directly increase population and employment at the project site and contribute to anticipated population and employment growth in the neighborhood and citywide context.

The proposed project would include the demolition of the existing vacant structure, and the development of a mixed-use residential/retail building, adding residents to the area. According to the 2010 U.S. Census, the proposed project is within Census Tract 012202, which had a reported population of 2,986 residents, within 1,633 occupied dwelling units. The 2010 U.S. Census reported a population of 805,235 residents in the City and County of San Francisco, and a population of approximately 33,896 residents within the Downtown/Civic Center neighborhood. The proposed project would add 19 new residential units, with 18 one-bedroom units, and one two-bedroom unit. Based on the average household size in the City and County of San Francisco of 2.26 people per household, the addition of 19 new residential units would

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increase the citywide population by approximately 43 residents. This would represent a residential population increase of approximately 0.005 percent citywide, and is not considered to be substantial within the citywide context. The addition of retail space could also indirectly contribute to a population increase as a result of new employees potentially moving to the City and project area from out of the region. However, the proposed project would include 445 gsf of retail space, which would not generate a substantial number of employees. It is also anticipated that most employees would come from the local and regional labor pools, and the number of employees moving from outside of the region would be negligible compared to the total population, and would not be a substantial increase in the citywide context. Therefore, direct and indirect population growth due to approval of the proposed project would be less than significant.

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

The project site currently contains a two-story building that has one residence on the second floor. However, the building is currently vacant, therefore, no residential or employee displacement would occur as a result of proposed project development. The creation of approximately 445 gsf of retail space could result in the need for a small amount of additional housing for employees. The number of such employees would be negligible compared to the total population and the available housing stock in San Francisco and the Bay Area, and would not necessitate the construction of new housing elsewhere. Therefore, the proposed project would result in less than significant impacts related to the displacement of people or creation of demand for additional housing.

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

As described previously, the proposed project would not induce substantial population growth or have significant physical environmental effects on housing demand or population. The approved and proposed projects identified in Section B.1, Cumulative Projects within Census Tract 012202—including the proposed project—would add approximately 496 new residents within 205 dwelling units in the area. This would represent a residential population increase of 16.6 percent and an occupied dwelling unit increase of 12.5 percent within the census tract. These proposed projects would be required to pay an
affordable housing in-lieu fee or provide a percentage of the total number of units either on site or off site as affordable units, and the physical impacts of the population increase are analyzed in this Initial Study.

Over the last several years, the supply of housing has not met the demand for housing within San Francisco. In July 2013, the Association of Bay Area Governments (ABAG) projected regional housing needs in the Regional Housing Need Plan for the San Francisco Bay Area: 2014–2022. The jurisdictional need of San Francisco for 2014–2022 is 28,869 dwelling units consisting of 6,234 dwelling units within the very low income level (0–50 percent); 4,639 units within the low income level (51–80 percent); 5,460 units within the moderate income level (81–120 percent); and 12,536 units within the above moderate income level (120 percent plus). These numbers are consistent with the development pattern for the region’s Plan Bay Area: Sustainable Communities Strategy (Plan Bay Area), a state-mandated, integrated long-range transportation, land use, and housing plan. As part of the planning process for Plan Bay Area, San Francisco identified Priority Development Areas, which are areas where new development will support the day-to-day needs of residents and workers in a pedestrian-friendly environment served by transit. Census Tract 012202 was identified within a Priority Development Area. Therefore, although the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would increase the population in the area, it would not induce substantial population growth, as this population growth has been anticipated. Furthermore, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in the displacement of substantial numbers of housing units or people as the majority of the approved and proposed projects would demolish existing buildings and include new mix-use residential developments. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable population and housing impact.

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E. Evaluation of Environmental Effects

E.3. CULTURAL RESOURCES

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<th>Topics:</th>
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CULTURAL RESOURCES – Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5? □ □ □ □ □

b) Cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5? □ □ □ □ □

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

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

Impact CR-1: The proposed project would cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code. (Potentially Significant)

As discussed in Section A, Project Description, the proposed project would demolish the existing two-story building on the site. The Van Ness Auto Row Support Structures Survey, commissioned by the San Francisco Planning Department in 2010, determined that the existing building, due to its well-maintained representation of an early automobile parts and supplies store, related to the historic automobile industry along the Van Ness corridor, is eligible for national, state, or local listing as a historic resource for the purposes of environmental review. As such, the building was determined to be eligible for listing on the California Register of Historic Resources, and is considered a historic resource. The survey included buildings along the Van Ness Avenue Corridor with a history related to the automobile industry in San Francisco such as auto showrooms and automotive support buildings. The 1033 Polk Street building was evaluated and found eligible because of its original use as an auto parts store during the 1920s and 1930s; which was subsequently converted to non-automotive commercial/retail use, and later residential uses following those time periods.

The proposed project was evaluated in a Historic Resource Evaluation (HRE)\textsuperscript{7} and reviewed by the San Francisco Planning Department Preservation Team, for potential impacts on historic resources. The Preservation Team Review (PTR)\textsuperscript{8} form concurred with the previous determination that the building is eligible for individual listing in the California Register of Historic Resources (as a well-maintained representation of an early automobile parts and supplies store related to the historic automobile industry along the Van Ness corridor) and therefore is an individual historical resource.

Additionally, the PTR form determined that the subject property is a contributor to an expansion of the National Register of Historic Places (NRHP) Lower Nob Hill Apartment and Hotel Historic District (District). The District, which was listed in the NRHP in 1991, is roughly comprised of 28 blocks on the south slope of Nob Hill. The District was listed as an unusually large, virtually intact, architecturally consistent, densely packed inner-city residential district consisting of architecturally significant residential buildings and housing associated with support services. The proposed expansion to the District would extend its boundaries west across Polk Street between Cedar and Hemlock Streets, including the project site, which would be a contributor to the District.

Therefore, demolition of the 1033 Polk Street building would have a potentially significant adverse effect on a historic resource. The EIR will evaluate the proposed project’s impacts on historic architectural resources.

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

The following information is based on the *Preliminary Archeological Review* (PAR) prepared by the San Francisco Planning Department\textsuperscript{9} and the *Geotechnical Investigation* prepared by LC Development Corporation\textsuperscript{10} for the 1033 Polk Street site.

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\textsuperscript{7} Tetra Tech, Inc. Historic Resource Evaluation for 1033-1037 Polk Street, San Francisco. October 11, 2016.

\textsuperscript{8} San Francisco Planning Department. Preservation Team Review Form. November 16, 2016. This document is on file and available for review at the San Francisco Planning Department as part of Case File 2014.0914E.

\textsuperscript{9} Dean, Randall. San Francisco Planning Department, Archeological Review Log

\textsuperscript{10} H Allen Gruen. 2016. *Geotechnical Investigation, Planned Development at 1033-1037 Polk Street, San Francisco, California*. May 21. 2016. This document is on file and available for review at the San Francisco Planning Department as part of Case File 2014.0914E.
The geotechnical investigation reported that one geotechnical boring to a depth of approximately 32 feet bgs was completed at the project site. The results indicate that the site is generally underlain by 2 feet of fill material, containing poorly graded sand with occasional debris encountered. From 2 feet to approximately 12 feet bgs, the site is underlain by poorly graded sands over clay deposits. Finally, from 12 feet to 32 feet bgs the site is underlain by loose to dense poorly graded sands. According to the geotechnical investigation, the depth to bedrock is approximately 230 feet bgs.\textsuperscript{11}

Earthmoving activities within subsurface sand deposits in San Francisco have been known to yield archeological resources. The proposed project would require excavations to a depth no greater than 4 feet bgs, and would primarily encounter fill material, and potential poorly graded sands over clay deposits.

The PAR completed for the proposed project site determined that potential exists for unknown prehistoric or historical archeological deposits to be present beneath the project site, which could lead to an accidental discovery during excavations or other earthmoving activities.

Based on the PAR, the proposed project may adversely impact potentially significant subsurface prehistoric or historical archeological deposits and/or features that may be present under the project site. Furthermore, the research significance of prehistoric or historical archeological resources that may be present within the site is unknown; thus, it is not known if potential archeological deposits at the site would be significant under CEQA. If any deposits found to be significant were encountered, potential damage to those artifacts due to proposed project construction activities could result in significant impacts under CEQA. Therefore, to reduce potential impacts on significant prehistoric or historical archeological resources, Mitigation Measure M-CR-2, Accidental Discovery would be required. This would require the project sponsor to distribute the Planning Department archeological resource “ALERT” sheet to the project contractor, and other necessary parties, prior to any ground disturbing activities. Should any indication of an archeological resource be encountered during any soils disturbing activity of the project, all ground disturbing activities would be cease until it is determined what additional measures should be taken. Therefore, with implementation of Mitigation Measure M-CR-2, potential impacts on archeological resources would be less than significant.

\textsuperscript{11} Ibid.
Mitigation Measure M-CR-2, Accidental Discovery

The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in CEQA Guidelines Section 15064.5(a) and (c). The project sponsor shall distribute the Planning Department archeological resource “ALERT” sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, pile driving, etc. firms); or utilities firm 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, supervisory personnel, etc. The project sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) 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 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 describing 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 Archeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound copy, one unbound copy and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.

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

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

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

On September 13, 2016, the Planning Department sent a “Tribal Notification Regarding Tribal Cultural Resources and CEQA” to the appropriate Native American tribal representatives who have requested notification. During the 30-day comment period, no Native American tribal representatives contacted the Planning Department to request consultation. As discussed under Impact CR-2, Mitigation Measure M-CR-2, Accidental Discovery, would be applicable to the proposed project as it would result in below-grade soil disturbance of 4 feet or greater bgs. Unknown archeological resources may be encountered during construction that could be identified as TCRs at the time of discovery or at a later date. Therefore, the potential adverse effects of the proposed project on previously unidentified archeological resources, discussed under Impact CR-2, also represent a potentially significant impact on TCRs. Implementation of Mitigation Measure M-CR-3, Tribal Cultural Resources Interpretive Program, would reduce potential adverse effects on TCRs to a less-than-significant level. Mitigation Measure M-CR-3 would require either preservation-in-place of the TCRs, if determined effective and feasible, or an interpretive program regarding the TCRs developed in consultation with affiliated Native American tribal representatives.

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

If the ERO determines that a significant archeological resource is present, and if in consultation with the affiliated Native American tribal representatives, the ERO determines that the resource constitutes a tribal cultural resource (TCR) and that the resource could be adversely affected by the proposed project, the proposed project shall be redesigned so as to avoid any adverse effect on the significant tribal cultural resource, if feasible.

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

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

**Impact C-CR-1:** The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity could result in cumulative impacts to historic architectural resources. (Potentially Significant)

The proposed project would result in the demolition of a potentially significant historic resource. When considered with past, present, and reasonably foreseeable future projects in the vicinity of the project site, the proposed demolition could result in a cumulatively considerable contribution to cumulative historic resource impacts. This topic will be addressed in the EIR.

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

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

E.4. TRANSPORTATION AND CIRCULATION

<table>
<thead>
<tr>
<th>Topics:</th>
<th>Potentially Significant Impact</th>
<th>Less-than-Significant Impact with Mitigation Incorporated</th>
<th>Less-than-Significant Impact</th>
<th>No Impact</th>
<th>Not Applicable</th>
</tr>
</thead>
</table>

TRANSPORTATION AND CIRCULATION – Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?

e) Result in inadequate emergency access?

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

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

PROJECT SETTING

The project site has frontages along Polk and Cedar Streets, with primary access on the Polk Street frontage. Polk Street is a north to south arterial roadway with one travel lane in each direction within the project vicinity. Polk Street has signalized intersections at both Post Street to the north and Geary Street to the south, but is not signalized at Cedar Street. Cedar Street is a west-to-east one-way street, providing access from Van Ness Avenue to Larkin Street, and is regulated by a stop sign at its intersection with Polk Street. Class II (striped and designated) bike lanes are available on both sides of Polk Street, while Cedar
Street does not provide any bicycle facilities. Street parking is available on both sides of Polk Street, and on the south side of Cedar Street. An existing curb cut is located along the Cedar Street frontage, which would be removed as a result of the project. A metered loading zone is provided along Polk Street in front of the project site, which would be retained.

Pedestrian sidewalks are provided on both sides of Polk and Cedar Streets in the project area. Pedestrian curb ramps are also provided on all street corners at all intersections near the project site.

The project site is well-served by public transit with Muni bus and cable car lines operating in the area.

As discussed previously, Muni bus lines serving the vicinity include the 19 along Polk Street (southbound stop at Polk and Sutter and northbound stop at Polk and Post), the 47 and 49 along Van Ness Avenue, the 2 and 3 along Post, Geary, and Sutter Streets (inbound stop at Post and Van Ness, outbound stop at Sutter and Van Ness), and the 38 along Geary Street and O’Farrell Street (outbound stop at Geary and Van Ness). Other Muni bus lines within 0.25 mile of the proposed project include five local lines (27, 31, 47, and 49), eight express lines (1AX, 1BX, 31AX, 31BX, 38AX, 38BX, 76X, and NX), and one rapid line (38R).

The Muni California Street cable car from Market Street to Van Ness Avenue is available four blocks north of the project site. BART and Muni Metro subway lines also serve the area, at the Civic Center station on Market Street, approximately 0.75 mile southeast. Regional roadways in the area providing access to the project include Van Ness Avenue (US 101) west of the project site, and I-80 and I-280 south of the project. US 101 provides the most direct regional access, and would be used by construction vehicles.

**Vehicle Miles Traveled in San Francisco and Bay Area**

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

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

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

For residential development, the regional average daily VMT per capita is 17.2.\textsuperscript{14} For retail development, regional average daily work-related VMT per employee is 14.9. See Table 3, Daily Vehicle Miles Traveled, which includes the transportation analysis zone (TAZ) in which the project site is located; TAZ 699.

\textsuperscript{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, both retail locations would be allotted the total tour VMT. A trip-based approach allows us to apportion all retail-related VMT to retail sites without double-counting.

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

\textsuperscript{14} Includes the VMT generated by the households in the development.
### E. Evaluation of Environmental Effects

#### TABLE 3: DAILY VEHICLE MILES TRAVELED

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Existing</th>
<th></th>
<th>Cumulative 2040</th>
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<tr>
<td></td>
<td>Bay Area Regional Average</td>
<td>Bay Area Regional Average minus 15%</td>
<td>TAZ 699</td>
<td>Bay Area Regional Average</td>
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<tr>
<td>Households (Residential)</td>
<td>17.2</td>
<td>14.6</td>
<td>2.6</td>
<td>16.1</td>
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<tr>
<td>Employment (Retail)</td>
<td>14.9</td>
<td>12.6</td>
<td>7.4</td>
<td>14.6</td>
</tr>
</tbody>
</table>

### VEHICLE MILES TRAVELED IMPACT ANALYSIS METHODOLOGY

**Vehicle Miles Traveled Analysis**

Land use projects may cause substantial additional VMT. The following identifies thresholds of significance and screening criteria used to determine if a land use project would result in significant impacts under the VMT metric.

**Residential and Retail (and Similar) Projects**

For residential projects, a project would generate substantial additional VMT if it exceeds the regional household VMT per capita minus 15 percent.\(^\text{15}\) As documented in the *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA* (“proposed transportation impact guidelines”), a 15 percent threshold below existing development is “both reasonably ambitious and generally achievable.”\(^\text{16}\) For retail projects, the Planning Department uses a VMT efficiency metric approach for retail projects: a project would generate substantial additional VMT if it exceeds the regional VMT per retail employee minus 15 percent. This approach is consistent with CEQA Section 21099 and the thresholds of significance for other land uses recommended in OPR’s proposed transportation impact guidelines. For mixed-use projects, each proposed land use is evaluated independently, per the significance criteria described above.

OPR’s proposed transportation impact guidelines provides screening criteria to identify types, characteristics, or locations of land use projects that would not exceed these VMT thresholds of

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\(^{15}\) OPR’s proposed transportation impact guidelines states a project would cause substantial additional VMT if it exceeds both the existing City household VMT per capita minus 15 percent and existing regional household VMT per capita minus 15 percent. In San Francisco, the City’s average VMT per capita is lower (8.4) than the regional average (17.2). Therefore, the City average is irrelevant for the purposes of the analysis.

significance. OPR recommends that if a project or land use proposed as part of the project meet any of the below screening criteria, then VMT impacts are presumed to be less than significant for that land use and a detailed VMT analysis is not required. The screening criteria applicable to the project and how they are applied in San Francisco are described below:

- **Map-Based Screening for Residential, Office, and Retail Projects.** OPR recommends mapping areas that exhibit where VMT is less than the applicable threshold for that land use. Accordingly, the Transportation Authority has developed maps depicting existing VMT levels in San Francisco for residential, office, and retail land uses based on the SF-CHAMP 2012 base-year model run. The Planning Department uses these maps and associated data to determine whether a proposed project is located in an area of the City that is below the VMT threshold.

- **Small Projects.** OPR recommends that lead agencies may generally assume that a project would not have significant VMT impacts if the project would either: (1) generate fewer trips than the level for studying consistency with the applicable congestion management program or (2) where the applicable congestion management program does not provide such a level, fewer than 100 vehicle trips per day. The Transportation Authority’s Congestion Management Program, December 2015, does not include a trip threshold for studying consistency. Therefore, the Planning Department uses the 100 vehicle trips per day screening criterion as a level generally where projects would not generate a substantial increase in VMT.

- **Proximity to Transit Stations.** OPR recommends that residential, retail, and office projects, as well projects that are a mix of these uses, proposed within 0.5 mile of an existing major transit stop (as defined by CEQA Section 21064.3) or an existing stop along a high quality transit corridor (as defined by CEQA 21155) would not result in a substantial increase in VMT. However, this presumption would not apply if the project would: (1) have a floor area ratio of less than 0.75; (2) include more parking for use by residents, customers, or employees of the project than required or allowed, without a conditional use; or (3) is inconsistent with the applicable Sustainable Communities Strategy.17

**2040 Cumulative Conditions**
San Francisco 2040 cumulative conditions were projected using a SF-CHAMP model run, using the same methodology as outlined above under “Vehicle Miles Traveled in San Francisco and Bay Area,” but including residential and job growth estimates and reasonably foreseeable transportation investments through 2040. For residential development, the projected 2040 regional average daily VMT per capita is

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17 A project is considered to be inconsistent with the Sustainable Communities Strategy if development is located outside of areas contemplated for development in the Sustainable Communities Strategy.
16.1. For retail development, regional average daily retail VMT per employee is 14.6. Refer to Table 3, Daily Vehicle Miles Traveled, which includes the TAZ in which the project site is located; TAZ 699.

**TRAVEL DEMAND**

Localized trip generation for the proposed project was calculated using information in the 2002 *Transportation Impacts Analysis Guidelines for Environmental Review* (Transportation Guidelines) developed by the San Francisco Planning Department. The proposed project would generate an estimated 235 person trips (inbound and outbound) on a weekday daily basis, consisting of 51 person trips by auto, 74 transit trips, 85 walk trips, and 25 trips by other modes.

During the p.m. peak hour, the proposed project would generate an estimated 33 person trips, consisting of six person trips by auto (four vehicle trips accounting for vehicle occupancy data for the census tract in which the project site is located), 12 transit trips, 12 walk trips and three trips by other modes.

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

**Vehicle Miles Traveled Analysis – Residential**

As mentioned previously, existing average daily residential VMT per capita is 2.6 for TAZ 699, in which the project site is located. This is 84 percent below the existing regional average daily residential VMT per capita of 17.2. Given that the project site is in an area where existing residential VMT is more than 15 percent below the existing regional average, the proposed project’s residential uses would not result in substantial additional VMT and impacts would be less than significant. Also, the project site meets the Proximity to Transit Stations, and the project meets Small Projects screening criteria, which indicates that the proposed project’s residential uses would not cause substantial additional VMT.

**Vehicle Miles Traveled Analysis – Retail**

As mentioned previously, existing average daily employment (retail) VMT per capita is 7.4 for TAZ 699, in which the project site is located. This is 50 percent below the existing regional average daily retail VMT per capita of 14.9. Given that the project site is in an area where existing retail VMT is more than 15 percent below the existing regional average...
percent below the existing regional average, the proposed project’s retail uses would not result in substantial additional VMT and impacts would be less than significant. The project site also meets the Proximity to Transit Stations and the project meets Small Projects screening criteria, which indicates that the proposed project’s retail uses would not cause substantial additional VMT.20

Impact TR-2: The proposed project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, nor would they conflict with an applicable congestion management program. (Less than Significant)

Loading

The proposed project’s loading demand would be less than one loading space, for both retail and residential uses combined. No off-street loading spaces would be provided for the proposed project, as is currently the case. However, this would be consistent with Planning Code Section 152, which does not require any loading spaces for retail establishments under 10,000 sf or for residential apartment buildings under 100,000 sf. Any double-parking by passenger vehicles for residential or retail loading could reduce traffic flow along Polk and Cedar Streets. However, as stated, there is a metered loading zone (yellow curb) space located along Polk Street in front of the proposed project site which could be temporarily used by vehicles for loading and unloading. Residential move-in/move-out operations are anticipated to use available street parking, or designated curb loading zones in the area, with items carted to the residential lobby. However, because the proposed project would include a relatively small number of residential units and a minimal amount of retail space, associated loading activities are anticipated to be minimal and not result in significant impacts.

Given the modest loading activity anticipated, delivery/freight vehicles would be expected to use existing commercial loading zones (yellow zones) in the project vicinity, such as the loading zone fronting the project site. However, these activities would also be anticipated to be minimal given the modest number of residential units and retail space available. Trash and recycling pickup would occur from Cedar Street, and would not be expected to adversely affect traffic, as these activities typically occur outside the peak hours. No significant traffic, transit, bicycle, or pedestrian impacts are expected to result from proposed project freight loading and service vehicle activities, and therefore, impacts would be less than significant.

20 Ibid.
Construction

Project construction is anticipated to last approximately 16 months, including demolition, site preparation, and construction phases. During this period, temporary and intermittent transportation impacts would result from additional vehicle trips to the project site from workers and equipment deliveries, but these activities would be limited in duration. It is not anticipated that project construction would require any travel lane closures along Polk or Cedar Streets; however, any lane closures that become necessary would need to be coordinated with the City in order to minimize the impacts on localized traffic. Construction staging for equipment and vehicles would occur primarily within the confines of the project site, or within a separate designated and permitted off-street location. Some minor disruptions to pedestrian flow could occur, including diversion of pedestrian traffic to the east side of Polk Street and the south side of Cedar Street, but would not otherwise impede or inhibit pedestrian circulation or degrade pedestrian safety. Construction vehicle trips during peak traffic flow would have a greater potential to create conflicts than during non-peak hours; however, given the temporary and intermittent nature of the construction activities, the proposed project’s construction-related activities would not result in significant transportation impacts.

Impact TR-3: The proposed project would not substantially increase traffic hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. (Less than Significant)

No project design features are proposed that would substantially increase traffic-related hazards. In addition, as discussed in Section E.1, Land Use and Land Use Planning, the proposed project would not include incompatible uses. Therefore, traffic hazard impacts due to a design feature or resulting from incompatible uses from the proposed project would be less than significant.

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

Emergency vehicle access is currently provided along both streets that front the project site (Polk Street and Cedar Street). Emergency access would remain unchanged from existing conditions. The proposed project would not close off any existing streets or entrances to public uses. Therefore, the proposed project would have a less-than-significant impact on emergency access.
Impact TR-5: The proposed project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. (Less than Significant)

**Transit Facilities**

The project site is well served by local and regional public transit. The proposed project would generate 12 p.m. peak hour transit trips. Transit trips generated by the proposed project would be distributed among the different local and regional transit services and screen lines including Muni, BART, Golden Gate Transit, and SamTrans, contributing only fractional increases in ridership. The addition of 12 p.m. peak hour transit trips from the proposed project would have a negligible impact on p.m. peak hour capacity utilization of the Muni bus and light rail lines and Caltrain and BART transit lines operating in the vicinity of the proposed project.

Muni bus stops are located along Polk Street adjacent to the northern site boundary (serving route 19), and northwest of the project site at Polk and Post Streets (serving routes 2, 3, and 19). However, project construction and operation is not anticipated to necessitate the temporary relocation of those bus stops. Project construction activities could potentially conflict with the operation of the bus stop north of the project site along Polk Street, if queuing of construction vehicles were to temporarily interfere with bus movements. However, any impacts would be short-term and would not result in significant or lasting impacts. Therefore, proposed project impacts on transit would be less than significant.

**Bicycle Facilities**

The project vicinity is currently served by existing bicycle routes, including a Class II bike lane on both sides of Polk Street along the project frontage. The proposed project would not interfere with accessibility to that lane. The proposed project would be required to provide a total of 19 Class 1 bicycle parking spaces per Planning Code Section 155.2. The proposed project would provide a minimum total of 19 Class 1 spaces and two Class 2 spaces, exceeding Planning Code requirements. While the proposed project would increase the amount of bicycle traffic along Polk Street and other streets in the vicinity of the project site by 25 daily trips, the expected magnitude of this increase would not be substantial enough to affect overall bicycle circulation or the operations of bicycle facilities, and therefore, impacts would be less than significant.

**Pedestrian Facilities**

Pedestrian trips generated by the proposed project would generally consist of people walking to and from the site. Because there would only be a total of 19 residential units and approximately 445 gsf of
retail space, the increase in daily pedestrian trips (85 person trips) generated in the area would be negligible. Access would be available on both the Polk Street and Cedar Street frontages, however the Polk Street frontage would be the main entrance point for the residential lobby. Sidewalks in the project area have adequate capacity and are not congested so as to not degrade the pedestrian safety. The proposed project would not degrade sidewalk conditions, and therefore, no pedestrian impacts would occur.

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

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

Furthermore, as shown in Table 3, Daily Vehicle Miles Traveled, for TAZ 699, in which the proposed project is located, projected 2040 average daily residential VMT per capita is 2.3, and projected average daily retail VMT per capita is 7.4. This is approximately 85 percent and 49 percent below the projected 2040 regional average daily VMT per capita of 16.1 and 14.6 for residential and retail uses, respectively. Therefore, the proposed project’s residential and retail uses would not contribute considerably to any substantial cumulative increase in VMT.

**Impact C-TR-2: The proposed project, in combination of past, present, and reasonably foreseeable future projects, would not have a cumulative impact on transportation. (Less than Significant)**

**Transit**

Other developments and future projects in the area could contribute additional residents and visitors that would contribute additional ridership to Muni and other local and regional transit providers in the area.
However, the proposed project contribution of 12 p.m. peak hour trips would be a fractional amount of new peak hour transit trips and would contribute only a minimal ridership increase to the cumulative scenario, thus having a negligible impact on capacity utilization thresholds under Cumulative Conditions. The minimal amount of new transit trips generated by the proposed project would be distributed among the different local and regional transit services and screenlines in the area. As a result, the proposed project would not constitute a cumulatively considerable contribution to any significant cumulative impacts related to capacity utilization on the local and regional transit screenlines.

**Bicycle and Pedestrian Facilities**

Bicycle and pedestrian trips throughout the City may increase under the cumulative scenario due to growth in general, however the proposed project would add a negligible amount of bicycle and pedestrian usage to existing facilities. The proposed project would provide adequate bicycle access and bicycle parking for the building, and therefore would not conflict with San Francisco’s Bicycle Plan, or other plan, policy, or program related to bicycle use in the city.

Minor sidewalk reconstruction would occur along the Polk and Cedar Street project frontages, causing temporary impacts to those facilities in the immediate project area. However, those facilities would be reconstructed to existing conditions, and the proposed project would not contribute to cumulative pedestrian facility impacts.

Furthermore, the proposed project would not include off-street parking spaces, or considerably increase the number of motor vehicle trips to and from the site. Thus, the proposed project would not be anticipated to create conflicts between bicyclists, pedestrians, and new vehicles. Therefore, cumulative bicycle and pedestrian facilities impacts would be considered less than significant.

**Loading**

The proposed project’s loading demand would be less than one loading space, for both retail and residential uses combined. No off-street loading spaces would be provided for the proposed project, as is currently the case. However, as stated, there is a metered loading zone (yellow curb) space located along Polk Street in front of the proposed project site which could accommodate the proposed project’s loading activities. The proposed project’s loading activities are anticipated to be minimal and it is not anticipated that the proposed project would contribute considerably to any cumulative loading impacts. Therefore, cumulative loading impacts would be considered less than significant.
Construction

Construction would last for approximately 16 months, including demolition, excavation, and construction phases. Construction would fractionally increase the amount of vehicle traffic in the project area during these phases due to work trucks circulating to and from the site and construction workers that may drive to the project site. However, these impacts would be fractional compared to the existing traffic volumes in the vicinity, and would not contribute to cumulative traffic impacts. Construction-related traffic impacts would be temporary in nature, and although they could occur during the same time periods as other projects in the surrounding area, the minimal amount of trips generated would not contribute to cumulative construction-related traffic impacts. Therefore, cumulative construction impacts would be considered less than significant.
**E.5. NOISE**

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

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

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

The proposed project would be subject to and regulated by the San Francisco Noise Ordinance (Noise Ordinance, Article 29 of the Police Code. The proposed residential portion of the project would include a rooftop common open space for use by building residents and their guests. Project residents using the
rooftop open space may contribute intermittent ambient noises to the surrounding area. The closest sensitive receptors to the building would be the residential units adjacent to the project site to the west and north of the building. Due to the height of the proposed project, it is expected that at least a 10-dBA noise reduction at adjacent use would occur from any noise generated from rooftop activities. Additionally, the proposed project would be subject to Noise Ordinance, which limits increases to ambient noise levels from commercial uses to eight dBA. Therefore, the noise associated with rooftop is not anticipated to result in a substantial increase in ambient noise levels above existing conditions in the project vicinity.

The typical noise environment in proposed project area is generally dominated by traffic and pedestrian noise. The proposed project would not contribute additional amounts of vehicle noise to substantially affect existing noise levels, and typical vehicle traffic noise would not have significant impacts on the proposed project. Therefore, the proposed project would not substantially contribute to or be affected by traffic-related ambient noise.

For the previously described reasons, the proposed project would have less-than-significant impacts on ambient noise levels in the project area.

Impact NO-2: The proposed project would not result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. (Less than Significant)

The proposed project’s construction activities would last approximately 16 months, and would occur over three phases—demolition, excavation and shoring, and construction. Construction noise and vibration have the potential to be felt by nearby receptors and uses. However, construction noise and vibration would be intermittent and limited to the period of construction. The closest sensitive receptors to construction activities would be the residential units located adjacent to the west of the project site, and the mixed-use residential and commercial/retail uses adjacent to the north of the project site.

The greatest construction-related noise- and vibration-generating activities would generally be limited to the first and second phases of project work during excavation, new foundation construction, and exterior and façade element construction. Foundation construction would not require pile driving, which is typically a significant source of groundborne noise and vibration. Instead, only minor excavation to a depth of approximately four feet bgs would be necessary for a 12-inch thick concrete slab foundation, with 12-inch diameter drilled-in-place piles, with holes to be pre-drilled. Furthermore, all construction
E. Evaluation of Environmental Effects

equipment would comply with measures specified in Section 2907 of the Noise Ordinance, which would require individual pieces of equipment not to exceed 80 dBA at a distance of 100 feet from the source. All impact tools (e.g., jackhammers) would be equipped with manufacturer-recommended and City-approved mufflers to further reduce noise and vibration impacts. Adherence to Section 2908 of the Noise Ordinance would prohibit construction work between 8:00 p.m. and 7:00 a.m., unless a special permit is authorized by the Director of the DPW or the Director of Building Inspection.

As stated, impacts would last the approximately 14 month duration of construction, and would be intermittent in nature. Although construction noise could be annoying at times, it would not be expected to exceed noise levels commonly experienced in this urban environment. Furthermore, construction noise and vibration would be reduced by exterior walls of the adjacent buildings, and by shoring placed around excavation areas. For these reasons, proposed project impacts would be less than significant.

**Impact NO-3: The proposed project would result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. (Less than Significant)**

Demolition, excavation, and building construction would cause a temporary increase in noise levels in the project vicinity. Construction equipment would generate noise and possibly vibrations that could be considered an annoyance by occupants of nearby properties. However, the use of approved mufflers on both intake and exhaust for impact tools would further reduce potential impacts. During the 16-month construction period, noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between noise source and affected receptor, and the presence (or absence) of barriers. Impacts would generally be limited to demolition and the periods during which new foundations and exterior structural and façade elements are constructed. Interior construction noise would be substantially reduced by exterior walls. However, there would be times when noise could interfere with indoor activities in nearby residences and other businesses near the project site.

As noted previously, construction noise is regulated by the Noise Ordinance. The nearest sensitive receptors to the project site are the residential uses adjacent to the west. These uses would experience temporary and intermittent noise associated with site preparation and construction activities. Noise impacts would be temporary in nature and would be limited to the 16-month construction period. Individual pieces of construction equipment, other than impact tools, would not exceed 80 dBA at a distance of 100 feet from the source. The Noise Ordinance would prohibit construction between 8:00 p.m.
and 7:00 a.m. Although construction noise could be annoying at times, it would not be expected to exceed noise levels commonly experienced in this urban environment, and impacts would be less than significant.

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

The 1033 Polk Street project would comply with the Noise Ordinance. Construction of the proposed project would occur on a temporary and intermittent basis and would not be anticipated to occur during the same time period as other projects in the vicinity. Although construction activities could occur simultaneously with other projects, generating increased construction noise in the area, noise impacts from both projects would be short term in nature. Roadways in the area are generally heavily traveled arterial roadways, generation of intermittent construction noise would not contribute to excessive noise levels along Polk Street. As with the proposed project, construction and operation of other projects in the vicinity would be subject to the Noise Ordinance, and therefore, these activities are not anticipated to create significant cumulative construction-related noise impacts.

Noises in the area are generated by a mixture of retail, entertainment, hotel, and residential, uses; however, noise sources in the area are primarily a result of vehicular traffic and pedestrian sounds, and are typical of noise levels found in San Francisco urban environments.

The proposed project would include retail and residential uses, and would not include any uses uncommon to the area and would not contribute to a substantial noise increase in the project area. The proposed project would be subject to the requirements of the Noise Ordinance. Therefore, it is not anticipated that the proposed project would contribute to any significant cumulative increases in ambient noise.

The proposed project, along with the other cumulative projects in the vicinity, is not anticipated to result in a doubling of traffic volumes along nearby streets. Therefore, the proposed project would not contribute considerably to any cumulative traffic-related increases in ambient noise.

For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable noise impact.
E. Evaluation of Environmental Effects

E.6. AIR QUALITY

<table>
<thead>
<tr>
<th>Topics:</th>
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<th>No Impact</th>
<th>Not Applicable</th>
</tr>
</thead>
</table>

AIR QUALITY – Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?
   - ☐

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

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

d) Expose sensitive receptors to substantial pollutant concentrations?
   - ☐

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

SETTING

Overview

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

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

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

Criteria Air Pollutants

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

Land use projects may contribute to regional criteria air pollutants during the construction and operational phases of a project. Table 4, Criteria Air Pollutant Significance Thresholds, identifies air quality significance thresholds followed by a discussion of each threshold. Projects that would result in criteria air pollutant emissions below these significance thresholds would not violate an air quality

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

standard, contribute substantially to an air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants within the SFBAAB.

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

**Ozone Precursors**

As discussed previously, the SFBAAB is currently designated as non-attainment for ozone and PM. Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG) and oxides of nitrogen (NOₓ). The potential for a project to result in a cumulatively considerable net increase in criteria air pollutants, which may contribute to an existing or projected air quality violation, are based on the state and federal CAA emissions limits for stationary sources. To ensure that new stationary sources do not cause or contribute to a violation of an air quality standard, BAAQMD Regulation 2, Rule 2 requires that any new source that emits criteria air pollutants above a specified emissions limit must offset those emissions. For ozone precursors ROG and NOₓ, the offset emissions level is an annual average of 10 tons per year (or 54 lbs. per day).²³ These levels represent emissions below, which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants.

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

increase in ROG and NOx emissions. Due to the temporary nature of construction activities, only the average daily thresholds are applicable to construction phase emissions.

**Particulate Matter (PM$_{10}$ and PM$_{2.5}$)**

The BAAQMD has not established an offset limit for PM$_{2.5}$. However, the emissions limit in the federal NSR for stationary sources in nonattainment areas is an appropriate significance threshold. For PM$_{10}$ and PM$_{2.5}$, the emissions limit under NSR is 15 tons per year (82 lbs. per day) and 10 tons per year (54 lbs. per day), respectively. These emissions limits represent levels below which a source is not expected to have an impact on air quality. Similar to ozone precursor thresholds identified above, land use development projects typically result in PM emissions as a result of increases in vehicle trips, space heating and natural gas combustion, landscape maintenance, and construction activities. Therefore, the above thresholds can be applied to the construction and operational phases of a land use project. Again, because construction activities are temporary in nature, only the average daily thresholds are applicable to construction-phase emissions.

**Fugitive Dust**

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

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24 PM$_{10}$ is often termed “coarse” PM and is made of particulates that are 10 microns in diameter or smaller. PM$_{2.5}$, termed “fine” PM, is composed of particles that are 2.5 microns or less in diameter.


Other Criteria Pollutants

Regional concentrations of CO in the Bay Area have not exceeded the state standards in the past 11 years and SO₂ concentrations have never exceeded the standards. The primary source of CO emissions from development projects is vehicle traffic. Construction-related SO₂ emissions represent a negligible portion of the total basin-wide emissions and construction-related CO emissions represent less than 5 percent of the Bay Area total basin-wide CO emissions. As discussed previously, the Bay Area is in attainment for both CO and SO₂. Furthermore, the BAAQMD has demonstrated, based on modeling, that in order to exceed the California ambient air quality standard of 9.0 ppm (8-hour average) or 20.0 ppm (1-hour average) for CO, project traffic in addition to existing traffic would need to exceed 44,000 vehicles per hour at affected intersections (or 24,000 vehicles per hour where vertical and/or horizontal mixing is limited). Therefore, given the Bay Area’s attainment status and the limited CO and SO₂ emissions that could result from a development projects, development projects would not result in a cumulatively considerable net increase in CO or SO₂, and quantitative analysis is not required.

Local Health Risks and Hazards

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

Unlike criteria air pollutants, TACs do not have ambient air quality standards but are regulated by the BAAQMD using a risk-based approach to determine which sources and pollutants to control as well as the degree of control. A health risk assessment is an analysis in which human health exposure to toxic substances is estimated, and considered together with information regarding the toxic potency of the substances, to provide quantitative estimates of health risks.29

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29 In general, a health risk assessment is required if the BAAQMD concludes that projected emissions of a specific air toxic compound from a proposed new or modified source suggest a potential public health risk. The applicant is then subject to a health risk assessment for the source in question. Such an assessment generally evaluates chronic, long-term effects, estimating the increased risk of cancer as a result of exposure to one or more TACs.
Air pollution does not affect every individual in the population in the same way, and some groups are more sensitive to adverse health effects than others. Land uses such as residences, schools, children’s day care centers, hospitals, and nursing and convalescent homes are considered to be the most sensitive to poor air quality because the population groups associated with these uses have increased susceptibility to respiratory distress or, as in the case of residential receptors, their exposure time is greater than that for other land uses. Therefore, these groups are referred to as sensitive receptors. Exposure assessment guidance typically assumes that residences would be exposed to air pollution 24 hours per day, 350 days per year, for 70 years. Therefore, assessments of air pollutant exposure to residents typically result in the greatest adverse health outcomes of all population groups.

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

In an effort to identify areas of San Francisco most adversely affected by sources of TACs, San Francisco partnered with the BAAQMD to conduct a citywide health risk assessment based on an inventory and assessment of air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed the “Air Pollutant Exposure Zone,” were identified based on health-protective criteria that considers estimated cancer risk, exposures to fine PM, proximity to freeways, and locations with particularly vulnerable populations. The project site is not located within the Air Pollutant Exposure Zone. Each of the Air Pollutant Exposure Zone criteria is discussed below.

**Excess Cancer Risk**

The above 100 per one million persons (100 excess cancer risk) criteria is based on United States Environmental Protection Agency (USEPA) guidance for conducting air toxic analyses and making risk

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management decisions at the facility and community-scale level.\(^{32}\) As described by the BAAQMD, the USEPA considers a cancer risk of 100 per million to be within the “acceptable” range of cancer risk. Furthermore, in the 1989 preamble to the benzene National Emissions Standards for Hazardous Air Pollutants (NESHAP) rulemaking,\(^{33}\) the USEPA states that it “…strives to provide maximum feasible protection against risks to health from hazardous air pollutants by (1) protecting the greatest number of persons possible to an individual lifetime risk level no higher than approximately one in one million and (2) limiting to no higher than approximately one in ten thousand [100 in one million] the estimated risk that a person living near a plant would have if he or she were exposed to the maximum pollutant concentrations for 70 years.” The 100 per one million excess cancer cases is also consistent with the ambient cancer risk in the most pristine portions of the Bay Area based on BAAQMD regional modeling.\(^{34}\)

**Fine Particulate Matter**

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

**Proximity to Freeways**

According to the California ARB, studies have shown an association between the proximity of sensitive land uses to freeways and a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children. Siting sensitive uses in close proximity to freeways increases both exposure to air pollution and the potential for adverse health effects. As evidence shows that sensitive uses in an area

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\(^{33}\) 54 Federal Register 38044, September 14, 1989.

within a 500-foot buffer of any freeway are at an increased health risk from air pollution,\(^{35}\) lots that are within 500 feet of freeways are included in the Air Pollutant Exposure Zone.

**Health Vulnerable Locations**

Based on the BAAQMD’s evaluation of health vulnerability in the Bay Area, those zip codes (94102, 94103, 94105, 94124, and 94130) in the worst quintile of Bay Area Health vulnerability scores as a result of air pollution-related causes were afforded additional protection by lowering the standards for identifying lots in the Air Pollutant Exposure Zone to: (1) an excess cancer risk greater than 90 per one million persons exposed, and/or (2) PM\(_{2.5}\) concentrations in excess of 9 \(\mu g/m^3\).\(^{36}\)

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

**Construction Air Quality Impacts**

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

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\(^{36}\) San Francisco Planning Department and San Francisco Department of Public Health. 2014. *2014 Air Pollutant Exposure Zone Map (Memo and Map)*, April 9. These documents are part of San Francisco Board of Supervisors File No. 14806, Ordinance No. 224-14 Amendment to Health Code Article 38.
Impact AQ-1: Proposed project construction activities would generate fugitive dust and criteria air pollutants, but would not violate an air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants. (Less than Significant)

Construction activities (short-term) typically result in emissions of ozone precursors and PM in the form of dust (fugitive dust) and exhaust (e.g., vehicle tailpipe emissions). Emissions of ozone precursors and PM are primarily a result of the combustion of fuel from on-road and off-road vehicles. However, ROGs are also emitted from activities that involve painting, other types of architectural coatings, or asphalt paving. The proposed project would demolish the existing building, and construct a new, approximately 19,231-gsf building containing 19 dwelling units, and approximately 445 gsf of retail use. During the approximately 16-month construction period, construction activities would have the potential to result in emissions of ozone precursors and PM, as discussed in the following paragraphs.

Fugitive Dust. Project-related demolition, excavation, grading, and other construction activities may cause wind-blown dust that could contribute PM into the local atmosphere. Although there are federal standards for air pollutants and implementation of state and regional air quality control plans, air pollutants continue to have impacts on human health throughout the country. California has found that PM exposure can cause health effects at lower levels than national standards. The current health burden of PM demands that, where possible, public agencies take feasible available actions to reduce sources of PM exposure. According to the ARB, reducing PM_{2.5} concentrations to state and federal standards of 12 μg/m³ in the San Francisco Bay Area would prevent between 200 and 1,300 premature deaths.\(^{37}\)

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

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

general public and of on-site workers, minimize public nuisance complaints, and to avoid orders to stop work by the Department of Building Inspection (DBI).

The Ordinance requires that all site preparation work, demolition, or other construction activities within San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures whether or not the activity requires a permit from DBI. The Director of DBI may waive this requirement for activities on sites less than 0.5 acre that are unlikely to result in any visible wind-blown dust.

In compliance with the Construction Dust Control Ordinance, the project sponsor and the contractor responsible for construction activities at the project site would be required to use the following practices to control construction dust on the site or other practices that result in equivalent dust control that are acceptable to the Director. Dust suppression activities may include watering all active construction areas sufficiently to prevent dust from becoming airborne; increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour (mph). During excavation and dirt-moving activities, contractors shall wet sweep or vacuum the streets, sidewalks, paths, and intersections where work is in progress at the end of the workday. Inactive stockpiles (where no disturbance occurs for more than seven days) greater than 10 cubic yards or 500 square feet of excavated material, backfill material, import material, gravel, sand, road base, and soil shall be covered with a 10 millimeter (0.01 inch) polyethylene plastic (or equivalent) tarp, braced down, or use other equivalent soil stabilization techniques. CCSF Ordinance 175-91 restricts the use of potable water for soil compaction and dust control activities undertaken in conjunction with any construction or demolition project occurring within the boundaries of San Francisco, unless permission is obtained from the San Francisco Public Utilities Commission (SFPUC). Non-potable water must be used for soil compaction and dust control activities during project construction and demolition. The SFPUC operates a recycled water truck-fill station at the Southeast Water Pollution Control Plant that provides recycled water for these activities at no charge.

Compliance with these regulations and procedures set forth by the San Francisco Health and Building Codes would ensure that potential project dust-related air quality impacts would be reduced to less-than-significant levels.

*Criteria Air Pollutants.* As discussed previously, construction activities would result in emissions of criteria air pollutants from the use of off- and on-road vehicles and equipment. To assist lead agencies in determining whether short-term construction-related air pollutant emissions require further analysis as to
whether the project may exceed the criteria air pollutant significance thresholds shown previously in Table 4, the BAAQMD, in its CEQA Air Quality Guidelines (May 2011), developed screening criteria. If a proposed project meets the screening criteria, then construction of the project would result in less-than-significant criteria air pollutant impacts. A project that exceeds the screening criteria may require a detailed air quality assessment to determine whether criteria air pollutant emissions would exceed significance thresholds. The CEQA Air Quality Guidelines note that the screening levels are generally representative of new development on greenfield sites\(^\text{38}\) without any form of mitigation measures taken into consideration. In addition, the previously described screening criteria do not account for project design features, attributes, or local development requirements that could also result in lower emissions.

The proposed project includes the construction of a mixed-use building with 19 residential units and approximately 445 gsf of ground floor retail space. The size of proposed construction activities would be below the criteria air pollutant screening sizes for mid-rise residential development identified in the BAAQMD’s CEQA Air Quality Guidelines. Thus, quantification of construction-related criteria air pollutant emissions is not required and the proposed project’s construction activities would result in a less-than-significant criteria air pollutant impact.

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

As discussed above, the proposed project site is not within an Air Pollutant Exposure Zone. With regards to construction emissions, off-road equipment (which includes construction-related equipment) is a large contributor to DPM emissions in California, although since 2007, the ARB has found the emissions to be substantially lower than previously expected.\(^\text{39}\) Newer and more refined emission inventories have substantially lowered the estimates of DPM emissions from off-road equipment such that off-road equipment is now considered the sixth largest source of DPM emissions in California.\(^\text{40}\) For example, revised PM emission estimates for the year 2010, which DPM is a major component of total PM, have

\(^{38}\) A greenfield site refers to agricultural or forest land or an undeveloped site earmarked for commercial, residential, or industrial projects.


\(^{40}\) Ibid.
E. Evaluation of Environmental Effects

decreased by 83 percent from previous 2010 emissions estimates for the SFBAAB.\(^{41}\) Approximately half of the reduction in emissions can be attributed to the economic recession (e.g., updated methodologies used to better assess construction emissions.\(^{42}\)

Additionally, a number of federal and state regulations are requiring cleaner off-road equipment. Specifically, both the USEPA and California have set emissions standards for new off-road equipment engines, ranging from Tier 1 to Tier 4. Tier 1 emission standards were phased in between 1996 and 2000 and Tier 4 Interim and Final emission standards for all new engines would be phased in between 2008 and 2015. To meet the Tier 4 emission standards, engine manufacturers will be required to produce new engines with advanced emission-control technologies. Although the full benefits of these regulations will not be realized for several years, the USEPA estimates that by implementing the federal Tier 4 standards, NO\(_x\) and PM emissions will be reduced by more than 90 percent.\(^{43}\)

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

“Due to the variable nature of construction activity, the generation of TAC emissions in most cases would be temporary, especially considering the short amount of time such equipment is typically within an influential distance that would result in the exposure of sensitive receptors to substantial concentrations. Concentrations of mobile-source diesel PM emissions are typically reduced by 70 percent at a distance of approximately 500 feet (ARB 2005). In addition, current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 40, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. This results in difficulties with producing accurate estimates of health risk.”\(^{44}\)


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

The project site is not located within an identified air pollution exposure zone. Although on-road heavy-duty diesel vehicles and off-road equipment would be used during the approximately 16 month construction period, emissions would be temporary and variable in nature and would not be expected to expose sensitive receptors to substantial air pollutants. Furthermore, the proposed project would be subject to, and comply with, California regulations limiting idling to no more than 5 minutes, which would further reduce nearby sensitive receptors exposure to temporary and variable DPM emissions. Therefore, because the proposed project site is not within an air pollutant exposure zone and construction activities would be temporary and variable over the approximately 16-month construction period, construction period TAC emissions would result in a less than significant impact to sensitive receptors.

**Operational Air Quality Impacts**

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

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

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

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46 California Code of Regulations, Title 13, Division 3, § 2485 (on-road) and § 2449(d)(2) (off-road).
The proposed project includes the construction of an eight-story mixed-use residential building, with 19 residential units and 445 gsf of retail space on the ground floor. The proposed project would be below the criteria air pollutant screening sizes for mid-rise residential development identified in the BAAQMD’s CEQA Air Quality Guidelines. Thus, quantification of project-generated criteria air pollutant emissions is not required, and the proposed project would not exceed any of the significance thresholds for criteria air pollutants. The project would result in less-than-significant impacts with respect to criteria air pollutants.

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

As discussed previously, the project site is not within an air pollutant exposure zone. However, the proposed project would generate air contaminants. Individual projects result in emissions of toxic air contaminants primarily as a result of an increase in vehicle trips. The BAAQMD considers roads with less than 10,000 vehicles per day “minor, low-impact” sources that do not pose a significant health impact, even in combination with other nearby sources, and recommends that these sources be excluded from the environmental analysis. The proposed project’s 18 daily vehicle trips would be well below this level and would be distributed among the local roadway network; therefore, an assessment of project-generated TACs resulting from vehicle trips is not required and the proposed project would not generate a substantial amount of TAC emissions that could affect nearby sensitive receptors and impacts would be less than significant.

The proposed project would not include the installation of any diesel-powered backup emergency generators, and thus, would not create impacts related to diesel emissions from backup generators.

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

The most recently adopted air quality plan for the SFBAAB is the 2010 Clean Air Plan (CAP). The 2010 CAP is a road map that demonstrates how the San Francisco Bay Area will achieve compliance with the state ozone standards as expeditiously as practicable and how the region will reduce the transport of ozone and ozone precursors to neighboring air basins. In determining consistency with the 2010 CAP, this analysis considers whether the project would: (1) support the primary goals of the CAP, (2) include applicable control measures from the CAP, and (3) avoid disrupting or hindering implementation of control measures identified in the CAP.
The primary goals of the CAP are to: (1) reduce emissions and decrease concentrations of harmful pollutants, (2) safeguard the public health by reducing exposure to air pollutants that pose the greatest health risk, and (3) reduce greenhouse gas emissions. To meet the primary goals, the CAP recommends specific control measures and actions. These control measures are grouped into various categories and include stationary and area source measures, mobile source measures, transportation control measures, land use measures, and energy and climate measures. The CAP recognizes that to a great extent, community design dictates individual travel mode, and that a key long-term control strategy to reduce emissions of criteria pollutants, air toxics, and greenhouse gases from motor vehicles is to channel future Bay Area growth into vibrant urban communities where goods and services are close at hand, and people have a range of viable transportation options. To this end, the 2010 CAP includes 55 control measures aimed at reducing air pollution in the SFBAAB.

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

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

Examples of a project that could cause the disruption or delay of 2010 CAP control measures are projects that would preclude the extension of a transit line or bike path, or projects that propose excessive parking beyond parking requirements. The proposed project would consist of an approximately 19,231 gsf mixed-
use building containing residential and retail space in a dense, walkable urban area near a concentration of regional and local transit service. It would not preclude the extension of a transit line or a bike path or any other transit improvement, and thus, would not disrupt or hinder implementation of control measures identified in the CAP.

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

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

Typical odor sources of concern include wastewater treatment plants, sanitary landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing facilities, fiberglass manufacturing facilities, auto body shops, rendering plants, and coffee roasting facilities.

During construction, diesel exhaust from construction equipment would generate some odors. However, construction-related odors would be temporary and would not persist upon project completion. Observation indicates that the project site is not substantially affected by sources of odors. The proposed project would include residential and retail uses, which are not anticipated to create significant sources of new odors. Therefore, odor-related impacts would be less than significant.

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

As discussed previously, regional air pollution is by its very nature largely a cumulative impact. Emissions from past, present, and future projects contribute to the region’s adverse air quality on a cumulative basis. No single project by itself would be sufficient in size to result in regional nonattainment of ambient air quality standards. Instead, a project’s individual emissions contribute to existing

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47 Observations based on TRC staff site visit, August 9, 2016.
cumulative adverse air quality impacts.\textsuperscript{48} The project-level thresholds for criteria air pollutants are based on levels by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants. The proposed project’s construction (Impact AQ-1) and operational (Impact AQ-3) emissions would not exceed the project-level thresholds for criteria air pollutants; therefore, the proposed project would not be considered to result in a cumulatively considerable contribution to regional air quality impacts.

Although the project would add new sensitive land uses and/or new sources of TACs (e.g., new vehicle trips and/or stationary sources), the project site is not located within an air pollutant exposure zone. The project’s incremental increase in localized TAC emissions resulting from new vehicle trips and/or a new source would be minor and would not contribute substantially to cumulative TAC emissions that could affect nearby and/or proposed sensitive land uses. Therefore, cumulative air quality impacts would be considered less than significant.

**E. Evaluation of Environmental Effects**

**E.7. GREENHOUSE GAS EMISSIONS**

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

The BAAQMD has prepared guidelines and methodologies for analyzing GHGs. These guidelines are consistent with CEQA Guidelines Sections 15064.4 and 15183.5, which address the analysis and determination of significant impacts from a proposed project’s GHG emissions. CEQA Guidelines Section 15064.4 allows Lead Agencies to rely on a qualitative analysis to describe GHG emissions resulting from a project. CEQA Guidelines Section 15183.5 allows for public agencies to analyze and mitigate GHG emissions as part of a larger plan for the reduction of GHGs and describes the required contents of such a plan. Accordingly, San Francisco has prepared the *GHG Reduction Strategy*,49 which presents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco’s Qualified *GHG Reduction Strategy* in compliance with CEQA guidelines.

The actions outlined in the strategy have resulted in a 23.3 percent reduction in GHG emissions in 2012 compared to 1990 levels,50 exceeding the year 2020 reduction goals outlined in the BAAQMD’s 2010 Clean

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Air Plan, Executive Order S-3-05, and Assembly Bill 32 (also known as the Global Warming Solutions Act).

Given that the City has met the State and region’s 2020 GHG reduction targets and San Francisco’s GHG reduction goals are consistent with, or more aggressive than, the long-term goals established under EO S-3-05 and EO B-30-15, the City’s GHG reduction goals are consistent with EO S-3-05, EO B-30-15, AB 32, and the Bay Area 2010 Clean Air Plan. Therefore, proposed projects that are consistent with the City’s GHG reduction strategy would be consistent with the aforementioned GHG reduction goals, would not conflict with these plans or result in significant GHG emissions, and would therefore not exceed San Francisco’s applicable GHG threshold of significance.

The following analysis of the proposed project’s impact on climate change focuses on the project’s contribution to cumulatively significant GHG emissions. Because no individual project could emit GHGs at a level that could result in a significant impact on the global climate, the analysis is in a cumulative context, this section does not include an individual project-specific impact statement.

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

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

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51 Executive Order S-3-05, June 1, 2005. Online: http://www.pcl.org/projects/2008symposium/proceedings/Coatsworth12.pdf. Accessed July 20, 2016. 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).


53 The Clean Air Plan, Executive Order S-3-05, and AB 32 goals, among others, are to reduce GHGs in the year 2020 to 1990 levels.

The proposed project would increase the intensity of use at the project site by demolishing the existing vacant building and developing the project site with a mixed-use residential/retail building. Therefore, the proposed project would contribute to annual long-term increases in GHGs as a result of increased vehicle trips (mobile sources) and residential and retail operations that result in an increase in energy use, water use and wastewater treatment, and solid waste disposal. Construction activities would also result in temporary increases in GHG emissions.

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

Compliance with the City’s Commuter Benefits Program, Emergency Ride Home Program, Transportation Sustainability Fee, and bicycle parking requirements would reduce the proposed project’s transportation-related emissions. These regulations reduce GHG emissions from single-occupancy vehicles by promoting the use of alternative transportation modes with zero or lower GHG emissions on a per capita basis.

The proposed project would be required to comply with the energy efficiency requirements of the City’s Green Building Code, Stormwater Management Ordinance, Water Conservation and Irrigation ordinances, and Energy Conservation Ordinance, which would promote energy and water efficiency, thereby reducing the proposed project’s energy-related GHG emissions. Additionally, the project would be required to meet the renewable energy criteria of the Green Building Code, further reducing the project’s energy-related GHG emissions.

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

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55 Compliance with water conservation measures reduces the energy (and GHG emissions) required to convey, pump and treat water required for the project.

56 Embodied energy is the total energy required for the extraction, processing, manufacture, and delivery of building materials to the building site.
Compliance with the City’s Street Tree Planting requirements would serve to increase carbon sequestration. Other regulations, including those limiting refrigerant emissions would reduce emissions of GHGs and black carbon. Regulations requiring low-emitting finishes would reduce volatile organic compounds (VOCs).57 Thus, the proposed project was determined to be consistent with San Francisco’s GHG reduction strategy.58

The project sponsor is required to comply with these regulations, which have proven effective as San Francisco’s GHG emissions have measurably decreased when compared to 1990 emissions levels, demonstrating that the City has met and exceeded EO S-3-05, AB 32, and the Bay Area 2010 Clean Air Plan GHG reduction goals for the year 2020. Other existing regulations, such as those implemented through AB 32, will continue to reduce a proposed project’s contribution to climate change. In addition, San Francisco’s local GHG reduction targets are consistent with the long-term GHG reduction goals of EO S-3-05, EO B-30-15, AB 32, and the Bay Area 2010 Clean Air Plan. Therefore, because the proposed projects is consistent with the City’s GHG reduction strategy, it is also consistent with the GHG reduction goals of EO S-3-05, EO B-30-15, AB 32, and the Bay Area 2010 Clean Air Plan, would not conflict with these plans, and would therefore not exceed San Francisco’s applicable GHG threshold of significance. As such, the proposed project would result in a less-than-significant impact with respect to GHG emissions. No mitigation measures are necessary.

57 While not a GHG, VOCs are precursor pollutants that form ground-level ozone. Increased ground-level ozone is an anticipated effect of future global warming that would result in added health effects locally. Reducing VOC emissions would reduce the anticipated local effects of global warming.
58 San Francisco Planning Department, Greenhouse Gas Analysis: Compliance Checklist for 1033 Polk Street, August 29, 2016. This document is on file and available for public review at the San Francisco Planning Department as part of Case File 2014.0914E.
### E.8. WIND AND SHADOW

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

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

Tall buildings and exposed structures can strongly affect the wind environment for pedestrians. A building that stands alone or is much taller than the surrounding buildings can intercept and redirect winds that might otherwise flow overhead and bring them down the vertical face of the building to ground level, where they create ground-level wind and turbulence. These redirected winds can be relatively strong, turbulent, and incompatible with the intended uses of nearby ground-level spaces. A building with a height that is similar to the heights of surrounding buildings typically would cause little or no additional ground-level wind acceleration and turbulence. Thus, wind impacts are generally caused by large building masses extending substantially above their surroundings, and by buildings oriented such that a large wall catches a prevailing wind, particularly if such a wall includes little or no articulation. In general, new buildings less than approximately 80 feet in height are unlikely to result in substantial adverse effects on ground-level winds such that pedestrians would be uncomfortable. Such winds may exist under existing conditions, but shorter buildings typically do not cause substantial changes in ground-level winds.

The Planning Code sets criteria for comfort and hazards under Planning Code Section 243(c)(10) for the Van Ness Special Use District. Planning Code Section 243(c)(10)(A) establishes an equivalent wind

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<td>WIND AND SHADOW – Would the project:</td>
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<tr>
<td>a) Alter wind in a manner that substantially affects public areas?</td>
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<tr>
<td>b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?</td>
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| | Potentially Significant Impact | | | |
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speed\textsuperscript{59} of 11 mph as the comfort criterion for areas of substantial pedestrian use. The Planning Code criterion requires buildings to be shaped so as not to cause ground-level wind currents to exceed these criteria. The Planning Code pedestrian comfort criterion of 11 mph is based on wind speeds measured and averaged over a period of 1 minute. In contrast, the Planning Code wind hazard criterion of 26 mph is defined by a wind speed that is measured and averaged over a period of 1 hour. When stated on the same time basis as the comfort criterion wind speed, the hazard criterion wind speed (26 mph averaged over 1 hour) is equivalent to a 1-minute average of 36 mph, which is a speed where wind gusts can blow people over, and therefore, are hazardous.

For the purposes of evaluating impacts under CEQA, the analysis uses the hazard criterion to determine whether the proposed project would alter wind in a manner that substantially affects public areas. The project’s effects related to the comfort criterion are presented for informational purposes.

A wind study was prepared for the proposed project.\textsuperscript{60} The following discussion relies on the information provided in that report. The wind tunnel testing followed Planning Department protocols, and was conducted at 17 wind speed sensor locations under existing conditions.

The results of the wind tunnel testing indicate that no sensor locations exceed the hazard criterion under existing conditions. For existing conditions plus proposed project conditions, the testing evaluated an eight-story building, approximately 85 feet in height, with a building footprint covering the project site. Those dimensions represent a conservative analysis of potential wind conditions. The testing indicated that massing would not cause street-level locations to exceed the wind hazard criterion.\textsuperscript{61} The proposed project would not generate pedestrian-level wind speeds that would exceed the wind hazard criterion in Planning Code Section 243(c)(10). Therefore, the proposed project would not alter wind in a manner that would substantially affect public areas, and would have less-than-significant impacts on wind conditions.

The wind tunnel testing found that two of the 17 sensor locations exceed the Planning Code’s 11 mph pedestrian comfort criterion under existing conditions. Wind speeds of 10 percent exceedance (i.e., the wind speed exceeded 10 percent of time) are 8.5 mph on average over the 17 sensor locations. The nearest

\textsuperscript{59} Pursuant to Planning Code Section 243(c)(10)(C), equivalent wind speed is defined as the mean hourly wind speed adjusted to incorporate the effects of gustiness or turbulence on pedestrians.

\textsuperscript{60} ESA. 2016. Evaluation of Wind Hazard Potential – 1033 Polk Street San Francisco, California, ESA #150256. July 8. This document is on file and available for public review at the San Francisco Planning Department as part of Case File 2014.0914E.

\textsuperscript{61} Ibid.
comfort criterion exceedances to the project site are at the northeast corner of Van Ness Avenue and Geary Street, and mid-block on the north sidewalk of Geary Street between Polk Street and Van Ness Avenue. For existing conditions plus proposed project conditions, the wind tunnel testing also indicated that no additional comfort criterion exceedances would occur under the existing plus project conditions at the 17 sensor locations.

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

Section 295 of the Planning Code was adopted to protect certain public open spaces under the jurisdiction of the Recreation and Park Department from shadowing by new and altered structures during the period between 1 hour after sunrise and 1 hour before sunset, year round. Section 295 restricts new shadow upon public open spaces under the jurisdiction of the Recreation and Park Department by any structure exceeding 40 feet in height, unless the Planning Commission finds that any adverse impact on use of the open space caused by the shadow would be insignificant. In 1989, to implement Section 295 and Proposition K, the Planning Commission and Recreation and Park Commission jointly adopted a memorandum (1989 Memorandum) establishing qualitative criteria for evaluating shadow impacts as well as Absolute Cumulative Limits (ACL) for certain parks. ACLs are “shadow” budgets that establish absolute cumulative limits for additional shadows, expressed as a percentage of Theoretically Available Annual Sunlight (TAAS) on a park with no adjacent structures present. An ACL standard has not been adopted for parks less than 2 acres having less than 20 percent existing shadow. To date, ACL standards have been established for 14 downtown parks.

The 1989 Memorandum sets forth qualitative criteria to determine when a shadow would be significant as well as information on how to quantitatively measure shadow impact. Qualitatively, shadow impacts are evaluated based on (1) existing shadow profiles, (2) important times of day, (3) important seasons in the year, (4) location of the new shadow, (5) size and duration of new shadows, and (6) public good served by buildings casting a new shadow. Quantitatively, new shadows are to be measured by the additional annual amount of shadow-square foot-hours as a percent of TAAS. Where an ACL has not been adopted for a park, the Planning Commission’s decision on whether a structure has a significant impact on property under the jurisdiction of the Recreation and Park Department is based on a review of qualitative and quantitative factors.
The nearest public open space to the project site, Sergeant John Macaulay Park, approximately 0.1 mile southeast of the project site, is under the jurisdiction of the Recreation and Park Department and subject to Section 295. That park, approximately 0.21 acre, or 9,148 sf, is at the northwest corner of Larkin and O’Farrell Streets, with Myrtle Street bordering the park to the north, mid-block on Larkin Street. The park is also bounded by a residential building to the west. The park is designed as a children’s park including play structures, slides, and swings. Sergeant John Macaulay Park, which is less than 1 acre in area, does not have an ACL for shadow increases under the 1989 Memorandum.

The proposed project would demolish the existing vacant building and construct a new building with a single eight-story building approximately 85 feet in height (98 feet in height with parapet and rooftop equipment).

The preliminary shadow fan prepared by the Planning Department found that the proposed project’s shadow would not shade Sergeant John Macaulay Park. The proposed project would cast net new shadow on nearby sidewalks—including those along Polk, Post, Cedar, and Geary Streets—at certain times of day throughout the year. Many of the sidewalks in this part of San Francisco are already shadowed for much of the day by densely developed, multi-story buildings, and additional project-related shadow would be temporary in nature and would not substantially affect the use of sidewalks.

At times the proposed project could also shade portions of nearby private property. 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.

For the previously discussed reasons, the proposed project would not create new shadow that would substantially affect outdoor recreation facilities or other public areas, and impacts would be considered less than significant.

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62 San Francisco Planning Department. 2017. 1033 Polk Street – 2014.0914E. Shadow Fan. April 18, 2017. This document is on file and available for public review at the San Francisco Planning Department as part of Case File 2014.0914U.
Impact C-WS-1: The proposed project, in combination with other past, present, or reasonably foreseeable future projects, would not result in significant cumulative impacts related to wind. (Less than Significant)

The above-referenced wind study tested a cumulative scenario with four potential new buildings, including the proposed project, within an approximately one-block radius in all directions from the project site, and found that the proposed project conditions plus cumulative conditions would be similar to existing conditions, and to existing conditions plus project conditions. The wind study found that no wind hazard exceedances would be generated under the project plus cumulative scenario. The average of the 10 percent exceeded wind speeds measured for all 17 test points would be 8.7 mph, increasing 0.2 mph from existing conditions, and existing conditions plus project conditions.

Therefore, the proposed project plus cumulative conditions would not alter wind in a manner that substantially affects public areas, and cumulative impacts are considered less than significant. With project plus cumulative conditions, one new pedestrian-comfort criterion exceedance would be generated at the northeast corner of Post Street and Van Ness Avenue, and the two existing comfort criterion exceedances on Geary Street would also remain.63

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

Although the proposed project would add new shadow to the project vicinity, it would not shade Sergeant John Macaulay Park, and would not contribute to significant cumulative effects on shadow conditions. Other development projects in the area could have the potential to cast new shadow on that open space, however those projects would also be subject to Planning Code Section 295. Accordingly, because no new shadow would be cast on open spaces by the proposed project, impacts would be less than significant.

63 Ibid.
E. Evaluation of Environmental Effects

TENNESSEE – Would the project:

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

c) Physically degrade existing recreational resources?

Impact RE-1: The proposed project would not increase the use of existing neighborhood parks or other recreational facilities, including recreation facilities, or require the expansion of recreational facilities, or physically degrade existing recreational resources. (Less than Significant)

The proposed project would develop a new mixed-use residential/retail building including 19 dwelling units. The new residents would be served by the San Francisco Recreation and Parks Department, which manages open spaces and recreational facilities throughout the City. The project site is within an intensely urban neighborhood, and does not contain large regional park facilities, however, is served by neighborhood parks and open spaces, as well as other recreational facilities. The San Francisco General Plan Recreation and Open Space Element (ROSE) identifies areas throughout the City that are identified as having a “High Need” for open space. High Need areas are defined as those with high population densities, high concentrations of seniors and youth, and lower income populations that are located outside of existing parking service areas.\(^{64}\) The proposed project is located within parcels classified as having a High Need for open space.

Although the proposed project is within a High Need area, several recreational open space areas are dispersed throughout the surrounding vicinity offering recreational opportunities. Those facilities include Sergeant John Macaulay Park, approximately 0.1 mile southeast; Lafayette Park, approximately

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\(^{64}\) San Francisco Planning Department. 2014. General Plan Recreation and Open Space Element (ROSE) Update. March 27, 2014. This document is available for public review at the San Francisco Planning Department as part of Case File 2010.0641E., Map 7.
0.45 mile northwest; Jefferson Square Park, approximately 0.35 mile southwest; Boeddeker Park, approximately 0.45 mile southeast; Turk and Hyde Mini Park, approximately 0.35 mile southeast; and Civic Center Plaza, approximately 0.4 mile south.

The proposed project would generate an estimated 43 new residents to the area, and would provide open space areas for those residents in the form of a private rooftop open space. Additionally, residents of the proposed residential units would be within walking distance of the above-noted open spaces.

Although the proposed project would introduce a new permanent population to the project site, the number of new residents projected would not be large enough to substantially increase demand for or use of the previously described neighborhood parks and recreational facilities, or citywide facilities, such as Golden Gate Park, such that substantial physical deterioration would be expected. The permanent residential population at the site and the incremental on-site temporary retail/residential visitor population growth that would result would not require the construction of new recreational facilities or the expansion of existing facilities.

For the previously described reasons, the proposed project would have a less-than-significant impact on recreational facilities and resources.

**Impact C-RE-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not have a cumulative impact on recreation. (Less than Significant)**

The use of recreational facilities in the area is not expected to noticeably increase as a result of the proposed project. The provision of the Planning Code-required open space would partially offset the demand for recreational resources and the potential for the deterioration and/or degradation of existing recreational resources in the project area. As with the proposed project, residential or residential mixed-use cumulative projects would also include Planning Code-required private and common open spaces to partially meet the demand for recreational resources from residents. Furthermore, the San Francisco General Plan ROSE recognizes the need for preserving and renovating existing public recreation space, as well as prioritizing acquisitions of potential new recreation spaces throughout the City, and specifically in “High Need areas.” The ROSE provides a neighborhood specific framework for implementation of the

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65 San Francisco Planning Department. 2014. *General Plan Recreation and Open Space Element (ROSE) Update*. March 27, 2014. This document is available for public review at the San Francisco Planning Department as part of Case File 2010.0641E.
General Plan goals for improvement and acquisition of recreation and open space resources; implementation of the policies included in the ROSE would address long-term needs associated with population increase in the project vicinity. Additionally, other future projects in the area could presumably include public open spaces as part of their design increasing access to open spaces in the project vicinity. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable recreation impact.
## E. Evaluation of Environmental Effects

### E.10. UTILITIES AND SERVICE SYSTEMS

<table>
<thead>
<tr>
<th>Topics: UTILITIES AND SERVICE SYSTEMS – Would the project:</th>
<th>Potentially Significant Impact</th>
<th>Less-than-Significant Impact with Mitigation Incorporated</th>
<th>Less-than-Significant Impact</th>
<th>No Impact</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?</td>
<td>❌</td>
<td>✔️</td>
<td>❌</td>
<td>❌</td>
<td>❌</td>
</tr>
<tr>
<td>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?</td>
<td>❌</td>
<td>❌</td>
<td>❌</td>
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</tr>
<tr>
<td>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?</td>
<td>❌</td>
<td>❌</td>
<td>❌</td>
<td>❌</td>
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</tr>
<tr>
<td>d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?</td>
<td>❌</td>
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<tr>
<td>e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?</td>
<td>❌</td>
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<tr>
<td>f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?</td>
<td>❌</td>
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<tr>
<td>g) Comply with federal, state, and local statutes and regulations related to solid waste?</td>
<td>❌</td>
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Impact UT-1: Approval of the proposed project would not exceed wastewater treatment requirements, exceed the capacity of the wastewater treatment provider serving the project site, or result in the construction of new or expansion of existing wastewater treatment or stormwater drainage facilities. (Less than Significant)

The proposed project area is served by San Francisco’s combined sewer system. The sewer system is designed to collect and treat sanitary sewage and rainwater runoff in the same treatment plants. Wastewater treatment for the east side of the city is provided primarily by the Southeast Water Pollution Control Plant. Project-related wastewater and stormwater would be treated according to standards contained in the city’s National Pollutant Discharge Elimination System (NPDES) permit. The NPDES standards are set and regulated by the Regional Water Quality Control Board (RWQCB). The proposed project would meet the wastewater pre-treatment requirements of the San Francisco Public Utilities
Commission (SFPUC), as required by the San Francisco Industrial Waste Ordinance, to meet RWQCB requirements. Therefore, the proposed project would not conflict with RWQCB requirements.

The proposed project would add residential and retail uses to the project site, which would incrementally increase the demand for wastewater and stormwater treatment services, but not in excess of amounts expected and provided for in the project area. The proposed project would incorporate water-efficient fixtures, as required by Title 24 of the California Code of Regulations. Compliance with these regulations would reduce wastewater flows and the amount of potable water used for building functions.

It is not anticipated that construction activities would require dewatering due to shallow excavation depths, however, preparation of a SWPPP, including an Erosion and Sediment Control Plan, which would be reviewed by the SFPUC, would prohibit sediments from entering runoff water requiring treatment at the Southeast Water Pollution Control Plant. Furthermore, any groundwater discharge would be temporary, and would not generate so much wastewater that new or expanded wastewater facilities would be required.

The proposed project would not substantially increase the amount of impervious surfaces at the project site. Low-impact design features are proposed to capture stormwater runoff. The proposed project would be required to meet the standards for stormwater management identified in the San Francisco Stormwater Management Ordinance (Ordinance No. 83-10) requiring a project to maintain, reduce, or eliminate the existing volume and rate of stormwater runoff discharged from a project site, and would be designed to meet the San Francisco 2010 Stormwater Design Guidelines, which would reduce the total stormwater runoff volume and peak stormwater runoff rate through the use of low-impact design approaches, including landscape solutions designed to capture rainwater, such as vegetated roof areas. The project sponsor would be required to submit a Stormwater Control Plan for SFPUC approval; the plan must comply with the stormwater design guidelines, and implementation of the plan would ensure that the project meets SFPUC performance measures related to stormwater runoff rate and volume. Because the proposed project would not substantially increase the amount of impervious surfaces, it would not create a substantial amount of additional runoff water.

Therefore, the proposed project would not substantially increase the demand for wastewater services and would result in a less than significant impact on wastewater treatment and stormwater drainage facilities.
Impact UT-2: The SFPUC has sufficient water supply and entitlements to serve the proposed project, and approval of the proposed project would not require expansion or construction of new water supply or treatment facilities. (Less than Significant)

Under SB 610 and SB 221.45, all large-scale projects in California subject to CEQA are required to obtain an assessment from a regional or local jurisdiction water agency to determine the availability of a long-term water supply sufficient to satisfy project-generated water demand. Under Senate Bill 610, a water supply assessment is required if a proposed project is subject to CEQA, requiring an EIR or Negative Declaration, and includes any of the following: (1) a residential development of more than 500 dwelling units; (2) a shopping center or business employing more than 1,000 persons or having more than 500,000 sf of floor space; (3) a commercial office building employing more than 1,000 persons or having more than 250,000 sf of floor space; (4) a hotel or motel with more than 500 rooms; (5) an industrial or manufacturing establishment housing more than 1,000 persons or having more than 650,000 sf or 40 acres; (6) a mixed-use project containing any of the foregoing; or (7) any other project that would have water demand at least equal to a 500-dwelling unit project.

The SFPUC can meet the current and future water demand in years of average or above-average precipitation. It can also meet future water demand in single-dry-year and multiple-dry-year events. With the Water Shortage Allocation Plan in place, and the addition of local supplies developed under the SFPUC Water System Improvement Program, the SFPUC concluded that it has sufficient water available to serve existing customers and planned future uses.66

Due to an overall proposed development of 19,231 gsf, including 19 residential units, a water supply assessment is not necessary. Although the proposed project would incrementally increase the demand for water in San Francisco, the estimated increase in demand could easily be accommodated within anticipated water use and supply. Furthermore, the project would incorporate water-conserving measures identified in Title 24 of the California Code of Regulations, such as low-flush restroom fixtures, thus reducing additional water demand. Therefore, the proposed project would have less-than-significant water supply impacts.

Impact UT-3: The proposed project would be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs, and would follow all applicable statutes and regulations related to solid waste. (Less than Significant)

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

The proposed project would fractionally increase total waste generation from the City; however, the proposed project would be required to comply with San Francisco Ordinance No. 27-06 and 100-09, as described previously. Due to the existing and anticipated increase of solid waste recycling in the City and the Agreement with Recology for diversion of solid waste to the Hay Road Landfill, any increase in solid waste resulting from the proposed project would be accommodated by the existing landfills. Thus, the proposed project would have less-than-significant impacts related to solid waste.

Impact C-UT-1: In combination with past, present, and reasonably foreseeable future development in the project site vicinity, the proposed project would not have a cumulative impact on utilities and service systems. (Less than Significant)

The proposed project would not substantially impact utility supply or service. Any nearby development would not contribute to a cumulatively substantial effect on the utility infrastructure of downtown San Francisco, and would also be subject to all applicable codes and regulations. Furthermore, existing service management plans address anticipated growth in the surrounding area and the region. Therefore, the
proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable utilities and service systems impact.
E. Evaluation of Environmental Effects

E.11. PUBLIC SERVICES

<table>
<thead>
<tr>
<th>Topics:</th>
<th>Potentially Significant Impact</th>
<th>Less-than-Significant Impact with Mitigation Incorporated</th>
<th>Less-than-Significant Impact</th>
<th>No Impact</th>
<th>Not Applicable</th>
</tr>
</thead>
</table>

PUBLIC SERVICES – Would the project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 of the public services such as fire protection, police protection, schools, parks, or other services?

☐ ☐ ☒ ☐ ☐

For a discussion of impacts on parks, refer to Section E.9, Recreation.

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

The San Francisco Fire Department (SFFD) and the Northern District (Tenderloin District) of the San Francisco Police Department (SFPD) operate in the project vicinity. Emergency services would be provided by SFFD Station 3, at 1067 Post Street, approximately 0.03 mile northeast of the site, and the SFPD Tenderloin Station at 301 Eddy Street, approximately 0.75 mile southwest. Proposed new structures would comply with applicable state and City building and fire codes. The proposed project would incrementally increase service population in the project area; this increase would not be substantial in light of the existing demand for police and fire protection in the City. Approval of the proposed project would not necessitate the construction of new fire or police stations or require the alteration or expansion of existing stations to maintain service ratios. Therefore, impacts on police and fire services would be less than significant.

Impact PS-2: The proposed project would not substantially increase the population of school-aged children and would not require new or physically altered school facilities. (Less than Significant)

A decade-long decline in San Francisco Unified School District (SFUSD) enrollment ended in the 2008–2009 school year, and total enrollment in the SFUSD increased from approximately 55,000 in 2007–2008 to 58,414 in the 2014–2015 school year. According to a 2010 SFUSD enrollment study, new market-rate condominium units in San Francisco generate very few public school students. In projecting enrollment through 2035, the study used a mix of enrollment factors; for the Market and Octavia and Transbay areas combined (the proposed project area includes similar housing and student demographics), the overall weighted student generation rate was 0.19 Kindergarten through 12th grade students per unit.  

Redding Elementary School, approximately 0.20 mile north of the project site; and the Tenderloin Community Elementary School, approximately 0.3 mile southwest of the project site, are the nearest public elementary schools. The closest middle schools are Bessie Carmichael School, approximately 1.1 miles southeast; and Everett Middle School, approximately 1.6 miles southwest. Mission, O’Connell, Galileo, and Independent Studies Academy High Schools are all within approximately two miles of the site. Nearby private schools include Sacred Heart Cathedral Preparatory School, approximately 0.24 mile southwest; De Marillac Academy, approximately 0.45 mile southeast; and the San Francisco City Academy, approximately 0.46 mile southeast of the project site.

The proposed project would include 19 residential units. Applying the student generation rate of 0.19 to the 19 residential units would result in an anticipated enrollment increase of approximately four students. This increase would not exceed the student capacities that are projected and accommodated by the SFUSD, as well as private schools in the project area. Therefore, the proposed project would not necessitate the need for new or physically altered schools. In addition, the proposed project would be subject to a citywide development impact fee, which requires a payment of $2.24 per sf of assessable space for residential development constructed within the SFUSD to be paid to the district.  


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

The proposed project would incrementally increase the demand for governmental services and facilities, such as libraries. However, this incremental increase would not be to the extent that new or physically altered facilities would be required. Therefore, the proposed project would have a less-than-significant impact on other government services.

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

The proposed project would not significantly increase demand on any public services including the SFFD, SFPD, SFUSD, and City and County of San Francisco. Cumulative development in the vicinity could incrementally increase demand for public services, which could result in the need for new or altered government facilities. However, increases in employment, visitor, and resident population associated with the proposed project would not be cumulatively considerable because the increase in demand would not be beyond levels already anticipated and planned for in the vicinity. For these reasons, the proposed project would not result in a considerable contribution to cumulative public service impacts, and this impact would be less than significant.
### E.12 BIOLOGICAL RESOURCES

<table>
<thead>
<tr>
<th>Topics:</th>
<th>Potentially Significant Impact</th>
<th>Less-than-Significant Impact with Mitigation Incorporated</th>
<th>Less-than-Significant Impact</th>
<th>No Impact</th>
<th>Not Applicable</th>
</tr>
</thead>
</table>

**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 Wildlife or U.S. Fish and Wildlife Service?

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 Wildlife or U.S. Fish and Wildlife Service?

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The project site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, other approved local, regional, or state habitat conservation plan, or within federally protected wetlands, as defined by Section 404 of the Clean Water Act. The project area does not contain riparian habitat or other sensitive natural communities or a federally protected wetland. Therefore, topics 12b, 12c, and 12f are not applicable to the proposed project, and will not be discussed further in this section.
Impact BI-1: The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any special-status species. (Less than Significant)

The project site is located in an urban environment with high levels of human activity, and only common bird species are likely to nest in the area. The project site is covered by a two-story building and fronted with impervious surfaces, and thus, any special-status species have been extirpated from this area. The project site does not provide habitat for any rare or endangered plant or wildlife species or diminish habitats. With the exception of trees, the project site does not support or provide habitat for any known rare or endangered species. In addition to those being no known habitat for species beyond street trees, a California Natural Diversity Database search of the project area revealed that while the project site is within the radius area of the California Black Rail, only two known occurrences of the species appear several miles northeast and northwest of the site. Therefore, occurrences of special-status species within the project area would be unlikely to occur. All development would also be required to comply with the California Fish and Game Code and the Migratory Bird Treaty Act (MBTA), which protect special-status bird species. Therefore, the proposed project would have a less-than-significant impact on special-status species.

Impact BI-2: The proposed project would not interfere with the movement of native resident or migratory wildlife species or with established native resident or migratory wildlife corridors. (Less than Significant)

The project site is within the highly urban environment of the Downtown/Civic Center neighborhood. Structures in an urban environment may present risks for migratory birds. No migratory fish or other wildlife species are located in the project area. Although migratory birds do pass through San Francisco, proposed development would not support habitat for those species. Construction of the proposed project may potentially present increased risks to birds, however, the City has adopted guidelines to describe the issue and provide regulations for bird-safe design within the City. The regulations establish bird-safe standards for new building construction, additions to existing buildings, and replacement façades to reduce bird mortality from circumstances that are known to pose a high risk to birds and are considered to be “bird hazards.” The proposed project would comply with Planning Code Section 139, as well as the California Fish and Game Codes and the MBTA, which protect special-status bird species. Therefore,

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impacts of the proposed project related to bird strikes would be considered less than significant, and no mitigation measures are necessary. The proposed project would not interfere with the movement of any native resident or wildlife species or with established native resident or migratory wildlife corridors. Therefore, the proposed project would result in a less-than-significant impact on migratory species movement.

Impact BI-3: The proposed project would not conflict with local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance. (Less than Significant)

The City’s Urban Forestry Ordinance, Public Works Code Sections 801 et seq., requires a permit from the DPW to remove any protected trees, commonly referred to as “street trees.” Three existing street trees are located on the project frontages, including two along Polk Street and one along Cedar Street. As part of the proposed project, the existing street trees would be retained. Furthermore, in accordance with Planning Code Section 138.1, Streetscape and Pedestrian Improvements, which requires that street trees be planted with construction of a new building in any district, the proposed project would include a new street tree placed along the Cedar Street frontage. If any construction activity would occur within the dripline of any protected tree, an International Society of Arboriculture-certified arborist must prepare a tree protection plan, and the plan must be submitted to the Planning Department for review and approval before a building permit is issued. Therefore, the proposed project would not conflict with any local policy or ordinance protecting biological resources, and no impact would occur.

Impact C-BI-1: The proposed project, in combination with other past, present, or reasonably foreseeable projects, would not result in a considerable contribution to cumulative impacts on biological resources. (Less than Significant)

As stated previously, the proposed project would not have a substantial adverse effect, either directly or through habitat modifications, or interfere with the movement of native resident or wildlife species. Similar to the proposed project, cumulative developments in the project area would be required to comply with the City’s Urban Forestry Ordinance, Public Works Code Section 801 et seq. and apply for a tree removal permit with the DPW (including requirements for tree replacement or in-lieu fees) if those projects propose tree removal. In the event any cumulative projects would have biological impacts, the proposed project would not contribute in a cumulatively considerable way that would affect a rare or

endangered species or habitat, or conflict with any local, regional or state habitat conservation plan or ordinance. For these reasons, the proposed project, in conjunction with other past, present, and reasonably foreseeable future projects, would not result in cumulatively significant biological resources impacts.
### E.13. GEOLOGY AND SOILS

#### Topics:

**Potentially Significant Impact**

*Less-than-Significant Impact with Mitigation Incorporated*  

<table>
<thead>
<tr>
<th>Topic</th>
<th>Potentially Significant Impact</th>
<th>Less-than-Significant Impact with Mitigation Incorporated</th>
<th>Less-than-Significant Impact</th>
<th>No Impact</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:</td>
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<tr>
<td>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)</td>
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<td>ii) Strong seismic ground shaking?</td>
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<td>iii) Seismic-related ground failure, including liquefaction?</td>
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<td>iv) Landslides?</td>
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<tr>
<td>b) Result in substantial soil erosion or the loss of topsoil?</td>
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<tr>
<td>c) Be located on a 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?</td>
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<tr>
<td>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?</td>
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<tr>
<td>e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?</td>
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<tr>
<td>f) Change substantially the topography of any unique geologic or physical features of the site?</td>
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<tr>
<td>g) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</td>
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</tbody>
</table>

The project site would be connected to the existing sewer system and would not require use of septic systems. Therefore, Question 13e would not be applicable to the project site.
Impact GE-1: The proposed project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic groundshaking, seismically induced ground failure, or landslides. (Less than Significant)

H. Allen Gruen conducted a geotechnical investigation for the project site.74 The following discussion relies on information provided in the geotechnical investigation.

One geotechnical boring to a depth of approximately 32 feet bgs was completed at the project site. The results of the boring and investigation indicate that the site is generally underlain by 2 feet of fill material, containing poorly graded sand with occasional debris encountered. From 2 feet to approximately 12 feet bgs, the site is underlain by poorly graded sands over clay deposits. Finally from 12 feet to 32 feet bgs the site is underlain by loose to dense poorly graded sands.

Groundwater was not encountered during the geotechnical investigation at the site; however, according to the report, groundwater in the area is known to occur at approximately 30 feet bgs. It is anticipated that groundwater in the area varies due to drought and rain conditions.

The project site does not lie within an Alquist-Priolo Earthquake Fault Zone, and no active or potentially active faults exist on or in the immediate vicinity of the site. The nearest mapped active fault is the North San Andreas Peninsula Fault, which is located approximately 7.5 miles to the west.75

During a major earthquake located on a nearby fault, strong to very strong groundshaking is expected to occur at the project site. However, the project would not expose people or structures to substantial adverse effects due to this groundshaking because the project would be designed and constructed in accordance with the most current San Francisco Building Code. The San Francisco Building Code also incorporates California Building Code requirements. The California Building Code defines various seismic sources, as well as calculations used to determine force exerted on structures during groundshaking events.

The project site lies within an area that is not identified to have liquefaction potential by the California Department of Conservation under the Seismic Hazards Mapping Act of 1990,76 and therefore, is not

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74 H Allen Gruen. 2016. Geotechnical Investigation, Planned Development at 1033-1037 Polk Street, San Francisco, California. May 21. This document is on file and available for review at the San Francisco Planning Department as part of Case File 2014.0914E.

anticipated to experience the effects of liquefaction. Furthermore, as described in the geotechnical investigation, the proposed project could be adequately supported on a conventional spread footing foundation. Otherwise, a mat foundation or drilled piers may be used as an alternative. All foundation considerations would comply with the San Francisco and California Building Codes, which would additionally be sufficient to alleviate any potential adverse effects of liquefaction.

According to the geotechnical investigation, the potential for lateral spreading on the project site is classified as low, and therefore there is a low risk of damage due to seismically induced lateral spreading. Furthermore, it is not located in a mapped area of earthquake-induced landslide susceptibility, as identified by the California Department of Conservation under the Seismic Hazards Mapping Act of 1990.

Therefore, the proposed project would not result in exposure of people and structures to potential substantial adverse effects. Impacts from seismic events or geologic hazards would be considered less than significant.

**Impact GE-2: The proposed project would not result in substantial erosion or loss of topsoil, nor would they change substantially the topography of any unique geologic or physical features of the site. (Less than Significant)**

The proposed project site is built out and covered with impervious surfaces, including the existing building and adjacent, streets, and sidewalks. Therefore, the proposed project would not result in the loss of topsoil. Site preparation would only require excavation to a depth of approximately 4 feet bgs to accommodate necessary foundations, resulting in the removal of approximately 325 cubic yards of soil. Site preparation and excavation activities could create the potential for wind- and water-borne soil erosion. However, the project site is flat, and the proposed project would affect only relatively small areas where site soils would be exposed; therefore, substantial erosion and loss of soil would not be expected to occur. Furthermore, the project sponsor would be required to implement an Erosion and Sediment Control Plan during construction activities, in accordance with Article 4.1 of the San Francisco Public Works Code (discussed in E.14, Hydrology and Water Quality), to reduce the impact of runoff from the

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76. California Department of Conservation, Division of Mines and Geology. 2000. State of California Seismic Hazard Zones, City and County of San Francisco, Official Map. November 17,
77. H Allen Gruen. 2016. Geotechnical Investigation, Planned Development at 1033-1037 Polk Street, San Francisco, California. May 21. This document is on file and available for review at the San Francisco Planning Department as part of Case File 2014.0914E.
78. Ibid.
conclusion site. The SFPUC must review and approve the Erosion and Sediment Control Plan prior to implementation, and would conduct periodic inspections to ensure compliance with the plan. As the site is generally flat, minor grading activities would not change the site topography or remove any unique geological features. Therefore, impacts of the proposed project related to soil erosion and loss of topsoil would be less than significant.

Impact GE-3: The proposed project site would not be located on a geologic unit or soil that is unstable, or that could become unstable as a result of the project. (Less than Significant)

The project site and surrounding vicinity do not include steep hills or cut slopes likely to be subject to landslide. The proposed project would not include a basement, only requiring excavation up to 4 feet bgs for foundations. As previously discussed, the property is underlain by approximately 2 feet of fill material, containing poorly graded sand with occasional debris encountered; then by poorly graded sands over clay deposits up to 12 feet bgs; and finally by loose to dense poorly graded sands down to approximately 32 feet bgs.

Ground settlement could result from excavation for construction, however, the geotechnical evaluation recommends support of the sides of the excavation, adjacent buildings, streets, and utilities during construction to address potential impacts. The San Francisco DBI would review the detailed geotechnical report to ensure that the potential settlement and subsidence impacts of excavation are appropriately addressed in accordance with Section 1704.15 of the San Francisco Building Code. Final building plans would be reviewed by DBI, which would determine if additional site-specific reports would be required. Furthermore, seismic related settlements of up to only 0.5 inch are anticipated to occur during such events throughout the building operation.79

Due to the shallow depth of excavation (approximately 4 feet bgs), it is not anticipated that groundwater would be encountered, and thus no dewatering would be necessary. Therefore, impacts related to unstable soils at the project site would be less than significant.

79 Ibid.
Impact GE-4: The proposed project would not create substantial risks to life or property as a result of being located on expansive soil. (Less than Significant)

Expansive soils expand and contract in response to changes in soil moisture, most notably when near surface soils change from saturated to a low-moisture content condition, and back again. Soils located beneath urban built-out areas are generally not highly susceptible to the effects of expansive soils. Because the artificial fill and sands found beneath the project site do not contain high proportions of clay particles that can shrink or swell with changes in moisture content, expansive soils are not anticipated to be found within the project site. In addition, urban built-out areas are generally not as susceptible to the effects of expansive soils. Therefore, risks to life or property related to the presence of expansive soils would be less than significant.

Impact GE-5: The proposed project could result in damage to, or destruction of, an as-yet unknown unique paleontological resource or site or unique geologic feature. (Less than Significant)

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

Paleontological resources are known to generally be contained in deeper bedrock formations such as the Franciscan Formation and Colma Formation, which are generally below dense dune sands. According to the geotechnical investigation for the project site, the depth to bedrock is approximately 230 feet bgs.\(^8\) Furthermore, the geotechnical investigation determined that the first 2 feet beneath the project site are underlain by fill material, with poorly graded sand extending up to approximately 12 feet bgs beyond the fill; both of these soil compositions are not known to contain paleontological resources. Because project excavations would only reach a depth of 4 feet bgs, it is unlikely anticipated that any paleontological resources would be encountered. Therefore, project construction would not result in damage of a paleontological resource, and impacts would be less than significant.

\(^8\) Ibid.
Impact C-GE-1: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a considerable contribution to cumulative impacts related to geologic hazards. (Less than Significant)

Geologic impacts are usually site-specific, and the 1033 Polk Street project would have no potential of cumulative effects with other projects. Cumulative development would be subject to the same standards, requirements, and design reviews as the proposed project. These measures would reduce the geologic effects of cumulative projects to less-than-significant levels.

For these reasons, the proposed project, in conjunction with other past, present, and reasonably foreseeable future projects, would not result in cumulatively significant geology and soils impacts.
### E.14. HYDROLOGY AND WATER QUALITY

<table>
<thead>
<tr>
<th>Topics</th>
<th>Potentially Significant Impact</th>
<th>Less-than-Significant Impact with Mitigation Incorporated</th>
<th>Less-than-Significant Impact</th>
<th>No Impact</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>HYDROLOGY AND WATER QUALITY</strong> – Would the project:</td>
<td></td>
<td></td>
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<tr>
<td>a) Violate any water quality standards or waste discharge requirements?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
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<tr>
<td>b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?</td>
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<tr>
<td>c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?</td>
<td>☐</td>
<td>☐</td>
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<tr>
<td>d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?</td>
<td>☐</td>
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<tr>
<td>e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?</td>
<td>☐</td>
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<tr>
<td>f) Otherwise substantially degrade water quality?</td>
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<tr>
<td>g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?</td>
<td>☐</td>
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<tr>
<td>h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?</td>
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</tr>
<tr>
<td>i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?</td>
<td>☐</td>
<td>☐</td>
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</tr>
<tr>
<td>j) Expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow?</td>
<td>☐</td>
<td>☐</td>
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<td>☐</td>
<td>☒</td>
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</tbody>
</table>
The proposed project site is not within a 100-year Flood Hazard Zone,\textsuperscript{81} a dam failure area,\textsuperscript{82} or a tsunami hazard area.\textsuperscript{83} No mudslide hazards exist on the proposed project site because this part of the City is not located near any landslide-prone areas.\textsuperscript{84} A seiche is an oscillation of a waterbody, such as a bay, that may cause local flooding. A seiche could occur in the San Francisco Bay due to seismic or atmospheric activity. However, the proposed project site is located approximately 1.2 miles from San Francisco Bay, and thus, would not be subject to a seiche. Therefore, topics 14g, 14h, 14i, and 14j are not applicable to the proposed project.

**Impact HY-1:** The proposed project would not violate any water quality standards or waste discharge requirements, substantially degrade water quality, or create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. (Less than Significant)

Wastewater resulting from the proposed project would flow to the City’s combined stormwater and sewer system, which is designed to collect and treat both sanitary sewage and rainwater runoff. Wastewater would be treated to standards contained in the City’s NPDES Permit for the Southeast Water Pollution Control Plant prior to discharge into the San Francisco Bay. The NPDES standards are set and regulated by the San Francisco Bay Area RWQCB, and therefore, the proposed project would not conflict with RWQCB requirements.

Proposed project construction could have the potential to result in runoff of surface water containing sediments and other pollutants from the site, which could drain into the combined sewer and stormwater system, necessitating treatment at the Southeast Water Pollution Control Plant prior to discharge into the San Francisco Bay. However, to minimize the potential for sediments and other pollutants to enter the combined system, a SWPPP—which includes an Erosion and Sediment Control Plan—would be prepared by the project sponsor to reduce impacts from construction-related activities to a less-than-significant level.

The existing project site is completely covered with a two-story building, and proposed new development would also completely cover the site. Although the new building would be taller than the existing

\textsuperscript{83} Ibid, Map 5.
\textsuperscript{84} Ibid, Map 4.
building, no substantial increase in impervious surfaces would occur. Furthermore, the proposed project would be designed to meet the standards for stormwater management identified in the San Francisco Stormwater Management Ordinance (Ordinance No. 83-10), requiring development to maintain, reduce, or eliminate the existing volume and rate of stormwater runoff discharged from the project site. Low-impact design features, including landscape solutions such as vegetated roof areas designed to capture stormwater runoff, would be used to achieve this. Therefore, while the proposed project may incrementally increase stormwater runoff, it would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, and would have a less-than-significant impact.

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

The existing project site is completely covered by a two-story building, greatly limiting the amount of surface that water could infiltrate to the groundwater. Proposed development would also cover the entire site, having the same effect. Groundwater is known to occur at approximately 30 feet bgs in the project area; excavation would only be necessary to a depth of 4 feet bgs, and thus would not be encountered. Finally, the proposed project would not result in the use of groundwater, and therefore would not deplete groundwater supplies or interfere substantially with groundwater recharge, and impacts would be less than significant.

Impact HY-3: The proposed project would not result in alterations to 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-site or off-site, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on site or off site. (Less than Significant)

The project site is located in the Downtown/Civic Center neighborhood of San Francisco, and thus, no streams or rivers exist at the project site. Therefore, the proposed project would not alter the course of a stream or river, or substantially alter the existing drainage pattern of the project site or area.

Construction activities would create the potential for erosion and transportation of soil particles off site through excavation and grading activities. However, as discussed previously in Impact HY-1, the project sponsor would be required to develop and implement a SWPPP to minimize the potential for on- or off-
site erosion or siltation, reducing impacts from construction related-activities to a less-than-significant level. Furthermore, the proposed project would not result in a substantial increase in impervious surfaces, and therefore, would not substantially increase the rate or amount of surface runoff in a manner that would result in on- or off-site flooding beyond current conditions. The proposed project would also include low-impact design features, such as a landscaped roof, designed to capture and minimize stormwater runoff. Therefore, impacts related to erosion and surface runoff resulting in flooding would be less than significant.

Impact C-HY-1: The proposed project, in combination with the past, present, and reasonably foreseeable future projects in the site vicinity, would not have a cumulative impact on hydrology and water quality. (Less than Significant)

As stated above, the proposed project would result in less-than-significant impacts to groundwater levels and existing drainage patterns. Therefore, it would not contribute considerably to any potential cumulative impacts, and cumulative impacts related to flooding would be less than significant. Because other development projects would be required to follow dewatering and water quality regulations, similar to the proposed project, no substantial cumulative impacts are anticipated, and the proposed project would not contribute considerably to any such cumulative effects. Thus, cumulative hydrology and water quality impacts would be less than significant.
### E.15. HAZARDS AND HAZARDOUS MATERIALS

<table>
<thead>
<tr>
<th>Topics:</th>
<th>Potentially Significant Impact</th>
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</table>

**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? [ ] [ ] [X] [ ] [ ]

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? [ ] [ ] [X] [ ] [ ]

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school? [ ] [ ] [X] [ ] [ ]

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? [ ] [ ] [X] [ ] [ ]

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? [ ] [ ] [ ] [X] [ ]

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? [ ] [ ] [ ] [X] [ ]

[g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? [ ] [ ] [X] [ ] [ ]

h) Expose people or structures to a significant risk of loss, injury, or death involving fires? [ ] [ ] [X] [ ] [ ]

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

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

The project would likely result in use of common types of hazardous materials typically associated with retail and residential uses, such as cleaning products, disinfectants, and building maintenance. These materials would be properly labeled, to inform the user of potential risks as well as handling procedures.
The majority of these hazardous materials would be consumed upon use, and would produce very little waste. Any hazardous wastes that are produced would be managed in accordance with Article 22 of the San Francisco Health Code. In addition, transportation of hazardous materials would be regulated by the California Highway Patrol and the California Department of Transportation. These hazardous materials are not expected to cause any substantial health or safety hazards. Therefore, potential impacts related to the routine use, transport, and disposal of hazardous materials would be less than significant.

Impact HZ-2: The proposed project would not create a potentially significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, including within 0.25 mile of a school. (Less than Significant)

The proposed project would result in demolition of the existing two-story building on the site and subsequent construction. Demolition and construction activities would follow all appropriate standards and regulations for hazardous materials, including the California Health and Safety Code. Schools within 0.25 mile of the project site include the Academy of Art University, approximately 0.12 mile south; Redding Elementary School, approximately 0.20 mile north; Sacred Heart Cathedral Preparatory School, approximately 0.24 mile southwest; and The Institute for Advanced Study of Human Sexuality, approximately 0.24 mile northwest (refer to Section E.11, Public Services, for a description of other schools in the area).

AEI Consultants conducted a Phase I Environmental Site Assessment (ESA) for the project site.85 The Phase I ESA was conducted to provide a record of conditions at the subject property and to evaluate what, if any, environmental issues exist at the project site. The Phase I ESA assessed the potential for adverse environmental impacts from the current and historical practices on the site and the surrounding area. The proposed project would construct a mixed-use residential development located on a site which historically contained an automobile parts and supplies store. The Phase I ESA completed for the property did not determine any known hazardous materials releases or conditions in connection with those uses.

The Department of Public Health (DPH) has jurisdiction over areas likely to contain 1906 earthquake rubble (historic landfill), which typically contains high concentrations of lead, which is regulated under

85 AEI Consultants. 2014. Phase 1 Environmental Site Assessment, 1033-1037 Polk Street, San Francisco, CA, 94109. July 18. This document is on file and available for review at the San Francisco Planning Department as part of Case No. 2014.0914E.
Article 22A of the Health Code, also known as the Maher Ordinance. Based on review of Maher Ordinance maps, the project site is not located within a known landfill zone. However, known historical landfill areas are located adjacent to the proposed project site, and due to their proximity, the project sponsor has submitted a Maher Application to the DPH. Therefore, the proposed project is subject to Article 22A of the Health Code. The Maher Ordinance requires the project sponsor to retain the services of a qualified professional to prepare a Phase I ESA that meets the requirements of Health Code Section 22.A.6. The Phase I would 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 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. Limited Environmental Site Characterization, and Preliminary Geotechnical Investigation, determined that some of the fill material contains elevated soluble lead at concentrations exceeding State of California hazardous waste levels, and requires additional investigation. The DPH requests that a complete Phase II Site Characterization and Work Plan be submitted once on-site buildings have been demolished.

The proposed project would be required to remediate potential soil contamination described above in accordance with Article 22A of the Health Code. Thus, the proposed project would not result in a significant hazard to the public or environment from contaminated soil and the proposed project would result in a less than significant impact.

Currently, Section 19827.5 of the California Health and Safety Code requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. Although the Phase I ESA recognized no environmental conditions for the project site, the assessment determined that due to the age of the building, asbestos containing materials and/or lead-based paint could be present within the existing building materials, although those items were not specifically tested for or evaluated in the scope of the Phase I ESA. Should those substances be found during testing prior to demolition activities, all appropriate procedures and regulations would be

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followed. Other hazardous building materials including electrical transformers containing polychlorinated biphenyls (PCBs), fluorescent light ballasts containing PCBs or bis (2-ethylhexyl) phthalate, and fluorescent light tubes containing mercury vapors were not identified during the Phase I ESA. If any hazardous building materials were identified prior to demolition activities, they would be properly disposed of off-site. For the reasons described above, the proposed project would not create a potentially significant hazard due to an accidental release of hazardous substances, and would have a less-than-significant impact.

**Impact HZ-3: The proposed project would not be constructed on a site identified on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. (Less than Significant)**

The proposed project would not be constructed on sites identified as hazardous material sites pursuant to Government Code Section 65962.5. According to the RWQCB’s GeoTracker online database, no sites that give any indication of significant environmental impacts are present within the proposed project boundaries. Sites previously identified as Leaking Underground Storage Tank cleanup sites are present in surrounding areas; however, those sites have since been designated as completed-case closed, and have been remediated to the satisfaction of the applicable regulatory authority (SWRCB or Department of Toxic Substances Control). As previously mentioned, the Phase I ESA prepared for the project site identified no evidence of recognized environmental conditions. Therefore, the proposed project would not result in a significant hazard to the public or environment from site contamination, and the impact would be less than significant.

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

San Francisco ensures fire safety through provisions of the Building and Fire Codes. The additional residents, employees, and visitors could contribute to congestion if an emergency evacuation of the greater downtown area were required. However, Section 12.202(e)(1) of the San Francisco Fire Code requires that all owners of high-rise buildings (defined as taller than 75 feet), such as the proposed project, “establish or cause to be established procedures to be followed in case of fire or other

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89 AEI Consultants. 2014. *Phase 1 Environmental Site Assessment, 1033-1037 Polk Street, San Francisco, CA, 94109*. July 18. This document is on file and available for review at the San Francisco Planning Department as part of Case No. 2014.0914E.
emergencies. All such procedures shall be reviewed and approved by the chief of division.” Additionally, construction would conform to the provisions of the Building Code and Fire Code, which require additional life-safety protections for high-rise buildings. Final building plans would be reviewed by SFFD and DBI to ensure conformance with the applicable life-safety provisions, including development of an emergency procedure manual and an exit drill plan. Furthermore, the proposed project is not within a fire hazard severity zone.\(^9\) Therefore, the proposed project would not obstruct implementation of the City’s Emergency Response Plan, and potential emergency response and fire hazard impacts would be less than significant.

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

Impacts from hazards are generally site-specific, and typically do not result in cumulative impacts. The proposed project would not have a significant impact on hazardous material conditions at the project site or in the vicinity. The Phase I ESA completed for the proposed project site did not identify any recognized environmental conditions, and testing would be conducted and all applicable regulations followed prior to demolition of structures that could potentially contain hazardous building materials. Any hazards at nearby sites would be subject to the same safety or remediation requirements discussed for the proposed project above, which would reduce any hazard effects to less-than-significant levels. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable hazards and hazardous materials impact.

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E. Evaluation of Environmental Effects

E.16. MINERAL AND ENERGY RESOURCES

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<tr>
<th>Topics:</th>
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MINERAL AND ENERGY RESOURCES – Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?

The proposed project site is within a designated Mineral Resource Zone 4 (MRZ-4) by the California Division of Mines and Geology under the Surface Mining and Reclamation Act of 1975.91 This designation indicates that there is insufficient information available to designate as any other MRZ, and therefore, it is assumed that no significant mineral deposits exist. Furthermore, according to the San Francisco General Plan, no significant mineral resources exist in all of San Francisco. Therefore, topics 17a and 17b are not applicable to the proposed project.

Impact ME-1: The proposed project would not encourage activities that result in the use of large amounts of fuel, water, or energy, or use these resources in a wasteful manner. (Less than Significant)

The proposed project would be in downtown San Francisco, where there is an existing building and infrastructure, and would be served by the existing utilities. As stated in the analysis in Section E.10, Utilities and Service Systems, adequate water supplies exist to serve the proposed project. In addition, the proposed project is located in a developed urban area that is served by multiple transit systems. Use of these transit systems by residents, visitors, and employees would reduce the amount of fuel expended in private automobiles. The proposed project’s energy demand would be typical for a development of this scope and nature, and would comply with current state and local codes concerning energy consumption, including Title 24 of the California Code of Regulations, enforced by DBI. The proposed project would

91 California Division of Mines and Geology. Open File Report 96-03 and Special Report 146 Parts I and II.
also be required to comply with the City’s Green Building Ordinance, as outlined in Chapter 7 of the Environment Code. Therefore, the energy demand associated with the proposed project would result in a less-than-significant impact.

**Impact C-ME-1: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in significant adverse cumulative mineral and energy impacts. (Less than Significant)**

No known minerals exist in the project site or in the vicinity, as all of the City of San Francisco falls within MRZ-4, as described above, therefore, the proposed project would not contribute to any cumulative impact on mineral resources.

Cumulative projects in the area would be required to comply with the City’s Green Building Ordinance and Title 24 of the California Code of Regulations, enforced by DBI. Because these building codes encourage sustainable construction practices related to planning and design, energy efficiency, and water efficiency and conservation, energy consumption would be expected to be reduced compared to conditions without such regulations. Therefore, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable impact related to mineral and energy resources.
### E.17. AGRICULTURE AND FOREST RESOURCES

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

**Would the project:**

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

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

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

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

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

The project site is within an urbanized area in the City and County of San Francisco that does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance; forest land; or land under Williamson Act contract. The area is not zoned for any agricultural uses. Therefore, topics 17a, b, c, d, and e are not applicable to the proposed project.
E. Evaluation of Environmental Effects

E.18. MANDATORY FINDINGS OF SIGNIFICANCE

<table>
<thead>
<tr>
<th>Topics:</th>
<th>Potentially Significant Impact</th>
<th>Less-than-Significant Impact with Mitigation Incorporated</th>
<th>Less-than-Significant Impact</th>
<th>No Impact</th>
<th>Not Applicable</th>
</tr>
</thead>
</table>

MANDATORY FINDINGS OF SIGNIFICANCE – Would the project:

a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

b) Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probably future projects.)

c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

The foregoing analysis identifies potentially significant impacts related to land use and planning and cultural resources, which would be further analyzed in the EIR.

a) As discussed in this Initial Study, the proposed project is anticipated to have less-than-significant impacts on the environment for the majority of topics discussed. However, the proposed project could have potentially significant impacts resulting from damage to unknown archeological and/or tribal cultural resources from proposed project construction. As described in Section F, Mitigation Measures, these impacts would be mitigated to less-than-significant levels through the implementation of Mitigation Measures M-CR-2, Accidental Discovery, and M-CR-3, Tribal Cultural Resources Interpretive Program. As noted previously, potentially significant and unavoidable impacts related to land use and cultural resources would be discussed in the EIR.

b) The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in cumulatively considerable impacts for the environmental topics discussed in this Initial Study, with the exception of land use and planning, as discussed in Section E.1, Land Use and Planning. Cumulative impacts related to land use and planning would be discussed in the EIR.
c) As discussed in this Initial Study, environmental impacts—including those that may have a direct or indirect adverse effect on humans (i.e., air quality and GHG emissions)—associated with the proposed project would have less-than-significant impacts. The proposed project would be consistent with land use and zoning requirements, with the exception of potentially unavoidable land use impacts related to the preservation of notable landmarks and areas of historic, architectural, or aesthetic value. As discussed, this impact would be addressed in the EIR.
F. MITIGATION MEASURES

The following mitigation measures have been adopted by the project sponsor and are necessary to avoid potentially significant impacts of the proposed project:

Mitigation Measure M-CR-2: Accidental Discovery

The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in CEQA Guidelines Section 15064.5(a) and (c). The project sponsor shall distribute the Planning Department archeological resource “ALERT” sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, pile driving, etc. firms); or utilities firm 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, supervisory personnel, etc. The project sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) 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 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 describing 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 Archeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound copy, one unbound copy and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.

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

If the ERO determines that a significant archeological resource is present, and if in consultation with the affiliated Native American tribal representatives, the ERO determines that the resource constitutes a tribal cultural resource (TCR) and that the resource could be adversely affected by the proposed project, the proposed project shall be redesigned so as to avoid any adverse effect on the significant tribal cultural resource, if feasible.

If the Environmental Review Officer (ERO), if in consultation with the affiliated Native American tribal representatives and the project sponsor, determines that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option, the project sponsor shall implement an
interpretive program of the TCR in consultation with affiliated tribal representatives. An interpretive plan produced in consultation with the ERO and affiliated tribal representatives, at a minimum, and approved by the ERO would be required to guide the interpretive program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, artifacts displays and interpretation, and educational panels or other informational displays.
G. PUBLIC NOTICE AND COMMENT

Concurrently with this Initial Study, the San Francisco Planning Department has issued a Notice of Preparation (NOP) of an EIR for the 1033 Polk Street Project. Together, the NOP and this Initial Study are called the NOP/Initial Study. The NOP/Initial Study (or a Notice of Availability of a NOP/Initial Study) is sent to owners of properties within 300 feet of the project site, neighborhood organizations, and other interested parties. Publication of the NOP/Initial Study initiates a 30-day public comment period. Comments received on the NOP/Initial Study will be considered in preparation of the EIR analysis.
H. DETERMINATION

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

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

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

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

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

Date 7/5/17

Lisa Gibson
Environmental Review Officer
for
John Rahaim
Director of Planning
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