Notice of Preparation of an Environmental Impact Report

Date: October 11, 2017
Case No.: 2016-010340ENV
Project Title: 500 Turk Street
Zoning: RC-4 District: Residential-Commercial-Combined, High Density
80-T Height and Bulk District
Block/Lot: 0741/002
Lot Size: 18,906 square feet
Project Sponsor: Daniel Findley, Tenderloin Neighborhood Development Corporation
(415) 358-3927
Lead Agency: San Francisco Planning Department
Staff Contact: Jeanie Poling – (415) 575-9072
Jeanie.poling@sfgov.org

PROJECT DESCRIPTION

The 500 Turk Street Project site is located within a developed city block bounded by Eddy Street to the north, Larkin Street to the east, Turk Street to the south, and Polk Street to the west, within the Tenderloin neighborhood of San Francisco. The project site is surrounded by a range of mid- to high-rise commercial, office, institutional, residential, and hotel uses.

The project site is currently developed with a one- to two-story, 20- to 30-foot-tall, 7,315-square-foot concrete tire and automobile service building constructed in 1935. The building is L-shaped, with a one-story west wing fronting on Turk Street and a one-story east wing fronting on Larkin Street. The two wings meet at the northwest corner, where the building includes a two-story component. The L-shaped building design creates an open area on the Turk and Larkin street frontages that is used for vehicular access and parking. A second parking and storage area is located at the rear of the building, along the northern property line. A freestanding marquee sign is also located within the parking lot, fronting the Turk Street and Larkin Street intersection, at the southeast corner of the property. There is no vegetation on the project site or along the surrounding street frontages. The entire site is covered with impermeable hardscape; the topography is generally level and slopes gently downward from the northern end towards Turk Street. The subject property has been identified as an historic resource under the California Environmental Quality Act (CEQA), as discussed in the initial study.

The proposed 500 Turk Street Project would result in the demolition of the existing building and associated surface parking lot and construction of an eight-story, approximately 106,000-square-foot building with approximately 82,000 square feet of residential uses, approximately 2,600 square feet of ground floor commercial space, approximately 3,600 square feet of common and residential amenity space, and approximately 5,240 square feet of common open space within a ground floor courtyard. A total of 108 residential units would be included in the building. The residential units would include 22 studio units, 30 one-bedroom units, 42 two-bedroom units, and 14 three-bedroom units, 107 of which
would be affordable to households earning up to 60 percent of the area median income, as defined in the attached initial study, and one of which would be provided for the on-site building manager.

The proposed building would be 79 feet in height at the roofline. The proposed project qualifies for administrative review and approval of the proposed building height by the planning department under Planning Code section 315. The proposed project also requires zoning administrator review and approval of a modification to planning code rear yard requirements and variances related to inner courtyard dimensions and dwelling unit exposure to an unobstructed open area. Other required city approvals are discussed in the initial study.

**FINDING**

The project may have a significant effect on the environment and an environmental impact report is required. This determination is based upon the criteria of the State 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 resource located at 500 Turk 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 p.m. on November 10, 2017. Written comments should be sent to Jeanie Poling, Environmental Planner, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103, or jeanie.poling@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 environmental impact report when considering a permit or other approval for this project. Please include the name of a contact person in your agency.

Members of the public are not required to provide personal identifying information when they communicate with the planning commission or the planning department. All written or oral communications, including submitted personal contact information, may be made available to the public for inspection and copying upon request and may appear on the planning department’s website or in other public documents.

10/11/17

Lisa Gibson
Environmental Review Officer
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<td>Assembly Bill</td>
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<td>ABAG</td>
<td>Association of Bay Area Governments</td>
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<td>ADRP</td>
<td>Archeological Data Recovery Plan</td>
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<td>AMI</td>
<td>Area Median Income</td>
</tr>
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<td>California Air Resources Board</td>
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<td>ATP</td>
<td>Archeological Testing Plan</td>
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<td>Bay Area Air Quality Management District</td>
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<td>Bay Area Rapid Transit</td>
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<td>California Environmental Quality Act</td>
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<td>CCAA</td>
<td>California Clean Air Act</td>
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<tr>
<td>CNEL</td>
<td>Community Noise Equivalent Level</td>
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<td>CO</td>
<td>carbon monoxide</td>
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<td>CRHR</td>
<td>California Register of Historic Resources</td>
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<tr>
<td>dB</td>
<td>Decibel</td>
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<tr>
<td>dBA</td>
<td>decibel (A-weighted)</td>
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<td>Department of Building Inspection</td>
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<td>DPM</td>
<td>diesel particulate matter</td>
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<td>FARR</td>
<td>Final Archeological Resource Report</td>
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<tr>
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<td>Federal Transit Administration</td>
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<tr>
<td>g/bhp-hr</td>
<td>grams per brake horsepower-hour</td>
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<td>g/hp-hr</td>
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<td>GHG</td>
<td>greenhouse gas</td>
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<td>HEPA</td>
<td>High Efficiency Particulate Air Filter</td>
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<td>hp</td>
<td>horsepower</td>
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<tr>
<td>in/sec</td>
<td>inches per second</td>
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<td>ISCOTT</td>
<td>Interdepartmental Staff Committee on Traffic and Transportation</td>
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<td>L_dn</td>
<td>day-night noise level</td>
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<tr>
<td>L_eq</td>
<td>equivalent continuous sound level</td>
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<td>MLD</td>
<td>Most Likely Descendant</td>
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<td>MTC</td>
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<td>MTCO2E</td>
<td>metric ton of carbon dioxide equivalents</td>
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<td>Muni</td>
<td>San Francisco Municipal Railway</td>
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<td>NAHC</td>
<td>California State Native American Heritage Commission</td>
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<tr>
<td>NOx</td>
<td>oxides of nitrogen</td>
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<tr>
<td>NO2</td>
<td>nitrogen dioxide</td>
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<td>Acronym</td>
<td>Definition</td>
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<td>NOP/IS</td>
<td>Notice of Preparation/Initial Study</td>
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<td>NPDES</td>
<td>National Pollutant Discharge Elimination System</td>
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<td>NSR</td>
<td>New Source Review</td>
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<td>NWIC</td>
<td>Northwest Information Center</td>
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<tr>
<td>OPR</td>
<td>State Office of Planning and Research</td>
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<tr>
<td>PAR</td>
<td>Preliminary Archeological Review</td>
</tr>
<tr>
<td>PCBs</td>
<td>polychlorinated biphenyls</td>
</tr>
<tr>
<td>PM</td>
<td>particulate matter</td>
</tr>
<tr>
<td>PM&lt;sub&gt;2.5&lt;/sub&gt;</td>
<td>PM composed of particulates that are 10 microns in diameter or less</td>
</tr>
<tr>
<td>PM&lt;sub&gt;10&lt;/sub&gt;</td>
<td>PM composed of particulates that are 2.5 microns in diameter or less</td>
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<tr>
<td>PPV</td>
<td>peak particle velocity</td>
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<td>QAACL</td>
<td>Qualified Archeological Consultants List</td>
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<tr>
<td>RMS</td>
<td>root mean square</td>
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<td>ROG</td>
<td>reactive organic gases</td>
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<td>RWQCB</td>
<td>Bay Area Regional Water Quality Control Board</td>
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<td>SB</td>
<td>Senate Bill</td>
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<td>SFCTA</td>
<td>San Francisco County Transportation Authority</td>
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<td>SFMTA</td>
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<td>SFPD</td>
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<td>SFPUC</td>
<td>San Francisco Public Utilities Commission</td>
</tr>
<tr>
<td>SMP</td>
<td>site mitigation plan</td>
</tr>
<tr>
<td>SO&lt;sub&gt;2&lt;/sub&gt;</td>
<td>sulfur dioxide</td>
</tr>
<tr>
<td>TACs</td>
<td>toxic air contaminants</td>
</tr>
<tr>
<td>TSF</td>
<td>Transportation Sustainability Fee</td>
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<tr>
<td>U.S. 101</td>
<td>U.S. Highway 101</td>
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<tr>
<td>U.S. EPA</td>
<td>U.S. Environmental Protection Agency</td>
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<tr>
<td>VMT</td>
<td>vehicle miles traveled</td>
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The proposed 500 Turk Street Project (project) would result in the development of residential and ground-floor commercial uses on an approximately 18,906-square-foot (0.43-acre) parcel (Assessor’s Block 0741, Lot 002) located at 500 Turk Street in San Francisco’s Tenderloin neighborhood. The project would result in the demolition of an existing one- to two-story, 7,315-square-foot tire and automobile service building and associated surface parking lot and construction of an eight-story approximately 106,000-square-foot building with approximately 82,000 square feet of residential uses, approximately 2,600 square feet of ground floor commercial space, approximately 3,600 square feet of common and residential amenity space, and approximately 5,240 square feet of common open space within a ground floor courtyard. A total of 108 residential units would be included in the building, 107 of which would be affordable, with most units distributed throughout the second through eighth stories. Residential units would include 22 studio units, 30 one-bedroom units, 42 two-bedroom units, and 14 three-bedroom units. All but one of the residential units would be affordable to households earning up to 60 percent of the area median income (AMI).¹

The proposed building would be 79 feet in height at the roofline and would reach a total of 89 feet in height including a penthouse for mechanical facilities and overruns, which is exempt from the measurement of building height under the planning code. This chapter includes a complete description of the proposed project, including a detailed description of the proposed project’s

¹ As applicable to the project, AMI is derived from the Income Limits determined by the U.S. Department of Housing and Urban Development for the San Francisco area, adjusted solely for household size, but not high housing cost area, also referred to as “Unadjusted Median Income.” AMI is published annually by the San Francisco Mayor’s Office of Housing and Community Development. For 2017, households earning 60 percent of the AMI have an annual income of $48,400 for one person households; $55,350 for two-person households; $62,250 for three person households; and $69,200 for four-person households. San Francisco Mayor’s Office of Housing and Community Development, 2017 Maximum Income by Household Size, April 14, 2017, http://sfmohcd.org/sites/default/files/Documents/MOH/Asset%20Management/2017%20AMI-IncomeLimits-HMFA_04-21-17.pdf, accessed September 15, 2017.
regional and local context, planning process and background, as well as a discussion of requested project approvals.

A. PROJECT SITE

The approximately 18,906-square-foot, square-shaped project site is located in the Tenderloin neighborhood and within the developed city block bounded by Eddy Street to the north, Larkin Street to the east, Turk Street to the south, and Polk Street to the west. The site is located at the northwest corner of the Turk Street and Larkin Street intersection at 500 Turk Street. Figure 1 shows the location of the project site and Figure 2, p. 4, provides an aerial view of the site. Figure 3, p. 5, illustrates the existing site conditions.

The project site is developed with a one- to two-story, 20- to 30-foot-tall, 7,315-square-foot concrete tire and automobile service building constructed in 1935. The building is L-shaped, with a one-story west wing fronting on Turk Street and a one-story east wing fronting on Larkin Street. The two wings meet at the northwest corner, where the building includes a two-story component. The L-shaped design creates an open area on the Turk and Larkin street frontages that is used for vehicular access and parking. A second parking and storage area is located at the rear of the building, along the northern property line. A freestanding marquee sign is also located within the parking lot, fronting the Turk Street and Larkin Street intersection, at the southeast corner of the property. The sign contains frequently changing aphorisms and quotations. Access to the main parking and service areas is via one driveway on Turk Street and two side-by-side driveways on Larkin Street. A third driveway on Larkin Street provides access to the rear parking area. Four parallel on-street parking spaces are located along the project site’s Turk Street frontage and two are located along the Larkin Street frontage. There is no vegetation on the project site or along the surrounding street frontages. The entire project site is covered with impermeable hardscape; the topography is generally level and slopes gently downward from the northern portion of the site towards Turk Street.
500 Turk Street Project
Aerial Photograph of Project Site and Surrounding Land Uses

500 Turk Street Project
Existing Site Conditions

FIGURE 3

500 Turk Street Project

The existing building is currently occupied by Kahn & Keville, a tire and automotive services company. A total of six employees are currently employed at this business. The building was evaluated in 2010 as part of the Van Ness Auto Row Support Structures Survey and assigned a National Register of Historic Places status code of 3CS, meaning that it appears eligible for inclusion in the California Register of Historic Resources (CRHR) as an individual property through survey evaluation. The building is also listed by the planning department as a Category A.1 Historic Resource (listed on or formally determined to be eligible for the CRHR) due to its longevity of use as a tire and battery shop, and its then-innovative design that incorporates an open vehicle maneuvering area at the corner.

The project site is located within the RC-4, Residential-Commercial-Combined, High Density District. The RC-4 district encourages a combination of high-density dwellings, with compatible commercial uses on the ground floor to protect and enhance neighborhoods with mixed-use character. Residential uses are permitted, as well as retail sales, office, and other retail-type services. The project site is also located within Subarea No. 1 of the North of Market Residential Special Use District, the purpose of which is to: (1) protect and enhance important housing resources within the district boundaries; (2) conserve and upgrade existing low and moderate income housing stock; (3) preserve buildings of architectural and historic importance and preserve the existing scale of development; (4) maintain sunlight in public spaces; (5) encourage new infill housing at a compatible density; (6) limit the development of tourist hotels and other commercial uses that could adversely impact the residential nature of the area; and (7) limit the number of commercial establishments that are not intended primarily for customers who are residents of the area. Dwelling unit density is limited to

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2 Kostura, William, Architectural Historian, Van Ness Auto Row Support Structures: A Survey of Automobile-Related Buildings along the Van Ness Avenue Corridor, 2010. This document (and all other documents cited in this report, unless otherwise noted), is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400 as part of Case File No. 2016-01340ENV.


4 Cleemann, Jorgen G., Preservation Planner, San Francisco Planning Department, Historic Resources Evaluation Response, 500 Turk Street, June 5, 2017.
one dwelling unit for each 125 square feet of lot area in Subarea No. 1 of the district. The site is also located within the 80-T height and bulk district.

B. PROPOSED PROJECT

The Tenderloin Neighborhood Development Corporation (project sponsor), a non-profit affordable housing developer, proposes to demolish the existing building and associated surface pavements and signage on the site and construct a new eight-story, 79-foot-tall (excluding 4-foot-tall parapets and a 10-foot-tall mechanical penthouse, as permitted under the planning code) residential with ground floor commercial building and associated improvements. The new approximately 106,000-square-foot L-shaped building would include a total of approximately 82,000 square feet of residential uses (108 units, 107 of which would be affordable); approximately 2,600 square feet of ground floor commercial space; approximately 3,600 square feet of common areas and residential amenity space; and approximately 5,240 square feet of common open space on the ground level. The residential units would include 22 studio units, 30 one-bedroom units, 42 two-bedroom units, and 14 three-bedroom units, all of which would be affordable to households earning up to 60 percent of the AMI, as defined above. No on-site parking is proposed.

Figure 4, p. 9, depicts the conceptual ground level floor plan; Figure 5, p. 10, depicts a typical floor plan for the second through eighth levels; and Figure 6, p. 11, depicts the roof plan. Figures 7a and 7b, pp. 12-13, illustrate conceptual south and east building elevations. Table 1 provides a summary of the proposed project components.

Table 1: Proposed Project Details

<table>
<thead>
<tr>
<th>Proposed Use</th>
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<tr>
<td>Residential Use</td>
<td>82,000 sf</td>
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<tr>
<td>Commercial Use</td>
<td>2,600 sf</td>
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<tr>
<td>Total Floor Area</td>
<td>106,000 sf</td>
</tr>
<tr>
<td>Open Space</td>
<td>5,240 sf</td>
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<tr>
<td>Number of Dwelling Units</td>
<td>108 (22 studios, 30 one-bedrooms, 42 two-bedrooms, and 14 three-bedrooms)</td>
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<tr>
<td>Number of Parking Spaces</td>
<td>10 on-street (5 net new)</td>
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<td>Number of Loading Spaces</td>
<td>2 on-street, white curb zones</td>
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<tr>
<td>Number of Bicycle Parking Spaces</td>
<td>110 class 1 and 12 class 2</td>
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<tr>
<td>Height of Building</td>
<td>79 feet</td>
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<tr>
<td>Number of Stories</td>
<td>8</td>
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sf = square feet; all sf numbers are approximate.

Source: Tenderloin Neighborhood Development Corporation, April 2017.
Project Building Characteristics

The proposed building would be L-shaped and oriented around an internal courtyard, with one wing fronting on Turk Street and the other on Larkin Street. The building would be set back approximately 5 feet from the adjacent street frontages and approximately 1 foot from the neighboring property lines to the north and west. The eight-story building would be approximately 79 feet and would not exceed 80 feet in height at the roofline. Elevator and stair overruns and mechanical features would extend up to an additional 10 feet above the roofline as permitted by the planning code. Parapets would extend an additional 4 feet above the roofline as permitted by the planning code. Back-up emergency generators are not required to serve the project and none would be located on site.

The ground level would include a total of about 2,600 square feet of commercial space in two locations, one approximately 1,245-square-foot ground-floor space at the corner of Turk and Larkin streets and the other approximately 1,355-square-foot ground-floor space along the Larkin Street frontage. A residential lobby would be located along the Turk Street frontage and would provide access to approximately 3,600 square feet of common and residential amenity spaces, including a community room, laundry room, community kitchen and supply room, and on-site property management and residential services offices. Three residential units would also be located at the ground level.

A total of 108 residential units would be included in the building, with most units distributed throughout the second through eighth stories. Residential units would include 22 studio units, 30 one-bedroom units, 42 two-bedroom units, and 14 three-bedroom units. A total of 107 of the residential units would be affordable to households earning up to 60 percent of the AMI, as defined previously. One unit would be provided for the on-site building manager.
FIGURE 6

500 Turk Street Project
Conceptual Roof Plan

LEVEL 1
0' - 0"

LEVEL 2
14' - 0"

LEVEL 3
23' - 0"

LEVEL 4
32' - 0"

LEVEL 5
41' - 0"

LEVEL 6
50' - 0"

LEVEL 7
59' - 0"

LEVEL 8
68' - 0"

ROOF
79' - 0"

SOURCES: DAVID BAKER ARCHITECTS; TNDC, JUNE 2017.

FIGURE 7a
500 Turk Street Project
Conceptual Building Elevations
NOT TO SCALE

SOURCES: DAVID BAKER ARCHITECTS; TNDC, JUNE 2017.
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Open Space and Landscaping

The proposed project would include approximately 5,240 square feet of common open space for use by project residents in an on-grade common courtyard area that would be located at the northwest corner of the site. The courtyard would include a children’s play area and a landscaped plaza. A total of 14 street trees would be planted along the Turk and Larkin street frontages as part of the proposed project. No trees or landscaping are proposed to be removed from the public right-of-way as part of the proposed project.

The proposed project would reduce the amount of impermeable (hardscape) surfaces on the site by removing the existing surface parking lot and adding approximately 5,240 square feet of permeable surfaces. Stormwater flows and retention would meet existing requirements and would be accommodated through on-grade stormwater planters, and permeable pavers. The proposed project would also provide new plantings and street trees on Turk and Larkin streets, in accordance with the Better Streets Plan.

Access and Circulation

Figure 8 illustrates on-site access and circulation. As shown, pedestrian access to the interior of the building, including to the residential uses, common and residential amenity spaces, management and residential services offices, and outdoor courtyard, would be provided by the residential lobby situated on Turk Street. Access to the upper residential floors would be provided by an elevator and stairway located adjacent to the lobby entrance. A second emergency egress would be located from another stairway leading to Larkin Street. Service entries would be located at two points along Larkin Street. Access to the ground floor commercial uses would be located along Turk and Larkin streets.

No on-site parking is proposed. As shown on Figure 8, existing curb cuts on Turk and Larkin streets would be removed, creating a total of five new on-street parking spaces, for a combined total of 10 existing and new on-street spaces, five of which would be located on Turk Street and five of which would be located on Larkin Street. A 20-foot-long passenger loading zone would be located on Turk Street, in front of the residential lobby entrance, and a 20-foot commercial loading zone would be designated along Larkin Street in front of the service entrances.
FIGURE 8

500 Turk Street Project
Circulation and Parking Plan

The project would include 110 secured *class 1* bicycle parking spaces and 12 *class 2* (on-sidewalk) bicycle parking spaces.\(^5\) Approximately 28 secured bicycle parking spaces would be accommodated in double stacks located in a bike room at the ground level. The remaining secured bicycle parking spaces would be distributed in bicycle parking rooms on the upper levels of the building\(^6\) or, alternatively, accommodated on the ground level.

As noted above, the project would also include widened sidewalks on Turk and Larkin streets in accordance with the Better Streets Plan.

**Demolition and Construction**

Construction activities at the project site would begin with demolition of the existing on-site structure and removal of all existing on-site pavements. A minimum of 2 feet and up to a maximum of 6 feet of site soils would be excavated from the site to accommodate new foundations and utility connections.

The proposed building would be accommodated on a mat foundation system; no impact pile driving is proposed. Support for the mat foundation system would be provided through ground improvements to densify the soil with maximum soil disturbance occurring approximately 17 to 21 feet below grade, depending whether the ground improvement is on the downslope or the upslope portion of the project site, respectively. Possible ground improvement methods include drilled displacement columns, aggregate piers, or rapid impact compaction, pursuant to the geotechnical investigation\(^7\) prepared for the proposed project. Construction of the proposed project is anticipated to occur over a 22-month period.

\(^5\) *Class 1* bicycle parking spaces are spaces in secure, weather-protected facilities intended for use as long-term, overnight, and work-day bicycle storage by dwelling unit residents, non-residential occupants, and employees. *Class 2* bicycle parking spaces are bicycle racks located in a publicly accessible, highly visible location intended for transient or short-term use by visitors, guests, and patrons to the building or use. See Planning Code section 155.1.

\(^6\) This location would require an administrative modification or variance from the zoning administrator pursuant to Planning Code section 155.1 standards for the location of *class 1* bicycle parking spaces.

\(^7\) Langan Engineering and Environmental Services, Inc. *Geotechnical Investigation 500 Turk Street San Francisco, California.* December 21, 2016.
C. PROJECT APPROVALS

The project is located in the RC-4 (Residential-Commercial-Combined, High Density) residential zoning district, Subarea No. 1 of the North of Market Residential Special Use District, and within the 80-T height and bulk district. Except as otherwise noted below, as currently proposed, the proposed project conforms to the use, density, unit mix, height and other restrictions of this zoning classification. The proposed project would require the following approvals. These approvals may be considered in conjunction with the required environmental review, but will not be granted until the required environmental review has been completed:

Planning Commission

- Planning Commission certification of the environmental impact report (EIR).

Planning Department

- The proposed project is an affordable housing project that qualifies for administrative review and approval under Planning Code section 315. The administrative review and approval document will include CEQA findings.

- The project sponsor is separately requesting San Francisco Zoning Administrator review and approval of three modifications/variances as follows:
  
  ○ Rear Yard Modification. Per Planning Code section 134(a)(1), the minimum rear yard depth within the RC-4 district is required to be equal to 25 percent (or about 34 feet 6 inches for this site) of the total depth of the lot on which the building is situated, but in no case less than 15 feet, and per Planning Code section 134(c), rear yards shall be provided at the lowest story containing a dwelling unit and at each succeeding level or story of the building. The project sponsor is requesting a modification to this requirement to instead allow the corner on-grade courtyard, which exceeds the area required under the rear yard provision.
○ **Inner Court Dimensions Variance.** Per Planning Code section 135(g), the area of an inner court may be credited as common usable open space, if the enclosed space is not less than 20 feet in every horizontal dimension and at least 400 square feet in area; and if the height of the walls and projections above the court on at least three sides (or 75 percent of the perimeter, whichever is greater) is such that no point on any such wall or projection is higher than one foot for each foot that such point is horizontally distant from the opposite side of the clear space in the court. The project sponsor is requesting a variance because due to site constraints, the project would not fully comply with these horizontal dimension requirements.

○ **Dwelling Unit Exposure Variance.** Per Planning Code section 140(a)(2), required dwelling units shall face directly onto a public street or an open area which is unobstructed and no less than 25 feet in every horizontal dimension for the floor at which the dwelling unit in question is located and the floor immediately above it, with an increase of 5 feet in every horizontal dimensions at each subsequent floor. Nine of the 108 dwelling units would not fully comply with these horizontal dimension requirements due to site constraints; therefore, the project sponsor is requesting a variance.

**Actions by Other City Departments**

- Loading and passenger zones and the reconfiguration/addition of on-street parking spaces by the San Francisco Municipal Transportation Agency (SFMTA) Color Curb Program;
- Demolition and building permits by the Department of Building Inspection (DBI);
- Stormwater Control Plan by the San Francisco Public Utilities Commission (SFPUC);
- Approvals of permits for streetscape improvements in the public right-of-way by the San Francisco Department of Public Works (Public Works); and
- Approval of a site mitigation plan, a health and safety plan, and a dust control plan by the San Francisco Department of Public Health (SFDPH).
D. PROJECT SETTING

The project site occupies a parcel located at the northwest corner of the Turk Street and Larkin Street intersection, within a developed city block. Turk Street is a one-way roadway, with three lanes of travel in the west direction and parallel parking on both sides of the street. Larkin Street is also a one-way, three-lane roadway, with travel lines in the north direction and parallel parking on both sides of the street. San Francisco Municipal Railway (Muni) bus stops are located within the project vicinity, including at the northeast intersection of Turk and Larkin streets, immediately east of the project site. The Bay Area Rapid Transit (BART) Civic Center station is located less than 0.5 miles southeast of the site.

The project site is located within the Tenderloin neighborhood. The Tenderloin is a high-density downtown neighborhood that is situated between the collection of government and administrative uses in the Civic Center area to the south; theater and arts uses to the east; the Downtown retail core around Union Square to the northeast; Van Ness Avenue to the west; and Nob Hill directly to the north. The project site also immediately abuts the Civic Center district to the south.

Existing uses within the immediate vicinity of the site range from mid- to high-rise commercial, office, institutional, residential, and hotel uses. Immediately north of the site and within the same city block is the one- to two-story Phoenix Hotel, which includes a surface parking lot, ground floor commercial space, and an outdoor pool area. East of the project site, across Larkin Street, are approximately seven-story residential buildings with ground floor commercial space. Southeast of the site, within the vicinity of the southeast corner of Turk and Larkin streets, are three- to seven-story residential buildings with ground floor commercial space. Immediately south of the site, across Turk Street is the approximately 250-foot-tall multi-story Federal Building and United States District Court House. Immediately west of the site and within the same block is a surface parking lot associated with a two-story building operated by a rental car company further to the west. Further west and within the same block is a public surface parking lot and a six-story hotel with ground floor commercial uses.
E. CUMULATIVE SETTING

Past, present and reasonably foreseeable cumulative development projects within a 0.25-mile radius of the project site (also referred to as the project vicinity) include a number of new residential and mixed-use buildings. Table 2 includes a list of all cumulative development projects within 0.25 miles of the project site. Figure 9, p. 23, shows the location of each cumulative project. Of those cumulative projects, a total of approximately 1,044 residential units and 36,860 square feet of commercial space would be constructed, intensifying land uses in the vicinity of the site. These cumulative projects are either approved or the subject of an environmental evaluation application on file with the planning department.
Table 2: Cumulative Projects in the Project Vicinity

<table>
<thead>
<tr>
<th>Cumulative Project No. (see Figure II-9)</th>
<th>Address</th>
<th>Case No.</th>
<th>Project Status Environmental Review</th>
<th>Net New Dwelling Units</th>
<th>Net New Commercial Space (Sq. Ft.)</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>101 Hyde St (1 block away)</td>
<td>2012.0086X</td>
<td>Complete</td>
<td>85</td>
<td>4,923</td>
<td>New 8-story residential building with ground-floor retail space.</td>
</tr>
<tr>
<td>2</td>
<td>145 Leavenworth St (2 blocks away)</td>
<td>2012.1531X</td>
<td>Complete</td>
<td>94</td>
<td>3,776</td>
<td>New 8-story residential building with group housing rooms and ground-floor retail space.</td>
</tr>
<tr>
<td>3</td>
<td>430 Eddy St (2 blocks away)</td>
<td>2014.0400CUA</td>
<td>Complete</td>
<td>22</td>
<td>0</td>
<td>New 8-story residential building.</td>
</tr>
<tr>
<td>4</td>
<td>519 Ellis St (3 blocks away)</td>
<td>2014.0506CUA</td>
<td>Complete</td>
<td>28</td>
<td>2,547</td>
<td>New 8-story residential building with ground-floor commercial space.</td>
</tr>
<tr>
<td>5</td>
<td>469 Eddy St (2 blocks away)</td>
<td>2014.0562CUA</td>
<td>Complete</td>
<td>29</td>
<td>2,600</td>
<td>New 8-story residential building with ground-floor retail space.</td>
</tr>
<tr>
<td>6</td>
<td>555 Golden Gate Ave (2 blocks away)</td>
<td>2014.1102E, CUA</td>
<td>Underway</td>
<td>52</td>
<td>1,000</td>
<td>Demolition of a commercial building and construction of a 10-story residential building with ground-floor commercial space.</td>
</tr>
<tr>
<td>7</td>
<td>1001 Van Ness Ave (6 blocks away)</td>
<td>2014.1305CUA</td>
<td>Complete</td>
<td>239</td>
<td>5,100</td>
<td>Demolition of a 4-story commercial building and construction of a 14-story residential building with commercial space.</td>
</tr>
<tr>
<td>8</td>
<td>719 Larkin St (3 blocks away)</td>
<td>2015-005329CUA</td>
<td>Complete</td>
<td>42</td>
<td>1,400</td>
<td>Demolition of a commercial building and construction of an 8-story residential building with ground-floor commercial space.</td>
</tr>
<tr>
<td>9</td>
<td>830 Eddy St (4 blocks away)</td>
<td>2015-009460CUA</td>
<td>Complete</td>
<td>126</td>
<td>0</td>
<td>Construction of a 15-story residential building.</td>
</tr>
<tr>
<td>10</td>
<td>600 Van Ness (2 blocks away)</td>
<td>2015-012729ENV, CUA</td>
<td>Underway</td>
<td>152</td>
<td>5,894</td>
<td>Demolition of a commercial building and construction of a 12-story residential building with ground-floor commercial space.</td>
</tr>
<tr>
<td>11</td>
<td>135 Hyde St (1 block away)</td>
<td>2015-015203DNX, ENV</td>
<td>Underway</td>
<td>72</td>
<td>910</td>
<td>Demolition of a one-story garage and construction of an 8-story residential building with ground-floor commercial space.</td>
</tr>
<tr>
<td>12</td>
<td>540 Van Ness Ave (3 blocks away)</td>
<td>2016-015569PPA</td>
<td>Underway</td>
<td>103</td>
<td>8,710</td>
<td>Demolition of two of three existing commercial buildings and construction of residential building with ground-floor retail space.</td>
</tr>
<tr>
<td>13</td>
<td>200 Larkin St (3 blocks away)</td>
<td>2015-015229ENV</td>
<td>Complete</td>
<td>0</td>
<td>0</td>
<td>12,000 sf addition to the Asian Art Museum.</td>
</tr>
</tbody>
</table>

Total 1,044 36,860

FIGURE 9

500 Turk Street Project
Cumulative Projects Map

F. COMPATIBILITY WITH ZONING AND PLANS

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

<table>
<thead>
<tr>
<th>Applicable</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓</td>
<td></td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Applicable</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓</td>
<td></td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>Applicable</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓</td>
<td></td>
</tr>
</tbody>
</table>

San Francisco Planning Code and Zoning Maps

The San Francisco Planning Code (planning code) incorporates by reference the city’s zoning maps, governs permitted uses, densities, and the configuration of buildings within San Francisco. Permits to construct new buildings (or to alter and 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) legislative amendments to the planning code are included as part of the proposed project.

The project site is located in the RC-4 zoning district. As stated in Planning Code section 209.3, the RC-4 district provides for a mixture of high-density dwelling units with supporting commercial uses. Commercial uses are permitted at a floor area ratio of 4.9 to 1.0 and ground floor ceiling heights are required to have a minimum floor-to-floor height of 14 feet. Onsite parking is not required. Within the RC-4 district, the proposed residential and commercial uses are principally permitted. Residential development density on the project site is subject to the development controls of the North of Market Residential Special Use District and under Planning Code section 249.5 (see below).

The project site is also located within Subarea No. 1 of the North of Market Residential Special Use District. According to Planning Code section 249.5, the purpose of this district is to (1) protect and enhance important housing resources in an area near Downtown; (2) conserve and upgrade existing low and moderate income housing stock; (3) preserve buildings of architectural and historic importance and preserve the existing scale of development; (4) maintain sunlight in public spaces; (5) encourage new infill housing at a compatible density; (6) limit the development of tourist hotels and
other commercial uses that could adversely impact the residential nature of the area; and (7) limit the number of commercial establishments which are not intended primarily for customers who are residents of the area. Commercial uses are limited to the ground floor and basement levels, and within Subarea No. 1, the density ratio is limited to one dwelling unit for each 125 square feet of lot area. The proposed uses and density of development are principally permitted within the North of Market Residential Special Use District.

The project site is located within the 80-T height and bulk district, which permits a maximum building height of 80 feet, with exceptions for certain additional features, such as elevator or stair overruns or other mechanical features. Bulk controls reduce the size of a building’s floorplates as the building increases in height. The T bulk district restricts plan dimensions, but only above 80 feet in height and the proposed project would be 79 feet in height, as measured under the planning code. Therefore, the proposed project would comply with existing height and bulk controls.

Conditional use authorization from the San Francisco Planning Commission would normally be required for a building over 40 feet in height with more than 50 feet of street frontage in the RC-4 zoning district under Planning Code section 253. However, there is an exception for qualified affordable housing projects under Planning Code section 315, including this project, and the proposed building height may be approved administratively by the planning department.

The project sponsor is requesting zoning administrator review and approval of three modifications/variances, including a rear yard modification, inner courtyard dimension variance, and dwelling unit exposure variance. Per Planning Code section 134(a)(1), the minimum rear yard depth within the RC-4 district is required to be equal to 25 percent (or about 34 feet, 6 inches for this site) of the total depth of the lot on which the building is situated, but in no case less than 15 feet, and per Planning Code section 134(c), rear yards shall be provided at the lowest story containing a dwelling unit, and at each succeeding level or story of the building. The project sponsor is requesting a modification to this requirement to instead allow the corner on-grade courtyard, which exceeds the area required under the rear yard provision. Per Planning Code section 135(g), the area of an inner court may be credited as common usable open space if the enclosed space is not less than 20 feet in every horizontal dimension and at least 400 square feet in area; and if the height of the walls and
projections above the court on at least three sides (or 75 percent of the perimeter, whichever is greater) is such that no point on any such wall or projection is higher than 1 foot for each foot that such point is horizontally distant from the opposite side of the clear space in the court. The project sponsor is requesting a variance because, due to site constraints, the project would not fully comply with these horizontal dimension requirements. Per Planning Code section 140(a)(2), required dwelling units shall face directly onto a public street or an open area which is unobstructed and no less than 25 feet in every horizontal dimension for the floor at which the dwelling unit in question is located and the floor immediately above it, with an increase of 5 feet in every horizontal dimensions at each subsequent floor. A total of nine of the 108 dwelling units would not fully comply with these horizontal dimension requirements due to site constraints; therefore, the project sponsor is requesting a variance. With zoning administrator approval, the proposed project would comply with planning code requirements and planning code allowable modifications and variances.

Under Planning Code section 151.1, projects in the RC zoning districts are not required to provide off-street parking spaces. While no off-street parking is proposed as part of the proposed project, driveway access would no longer be needed and existing curb cuts on Turk and Larkin streets would be removed, creating a total of 10 (five net new) parking spaces distributed evenly on Turk and Larkin streets. Planning Code section 155.2 requires new residential buildings to provide one secured (class 1) bicycle parking space for each dwelling unit up to 100 dwelling units and one bicycle parking space for every four dwelling units above 100. The planning code requires new residential buildings to provide one class 2 bicycle parking space for every 20 dwelling units. No class 1 spaces are required for retail uses under the planning code where less than 7,500 square feet of retail uses are proposed. One class 2 space is required under the planning code for every 750 to 2,500 square feet of occupied floor area of retail uses, depending on the type of retail uses ultimately proposed. Therefore, 102 class 1 bicycle parking spaces and six to nine class 2 bicycle parking spaces would be required for the project. As the proposed project would provide 110 secured class 1 bicycle parking spaces and 12 class 2 (on-street) bicycle parking spaces, the project would comply with the planning code’s bicycle parking requirements.
Plans and Policies

San Francisco Planning Code and Zoning Maps

See the discussion above regarding project compliance.

San Francisco General Plan

The San Francisco General Plan (the general plan) establishes objectives and policies to guide land use decisions related to physical development in the city. The general plan is comprised of 10 elements, each of which addresses a particular topic that applies citywide: air quality; arts; commerce and industry; community facilities; community safety; environmental protection; housing; recreation and open space; transportation; and urban design. The general plan elements provide goals, policies, and objectives for the physical development of San Francisco.

City decision-makers will evaluate the proposed project in the context of the general plan, and as part of the project review process will consider potential conflicts. The consideration of general plan objectives and policies would take place independently of the environmental review process. Any potential conflict not identified in this initial study would be considered in that context and would not alter the analysis of physical environmental impacts found in this initial study.

Two general plan elements that are particularly applicable to planning considerations associated with the proposed project are the urban design and housing elements. These elements are discussed in more detail below. Other elements of the general plan that are applicable to technical aspects of the proposed project include air quality; noise; community safety; and recreation and open space. The proposed project’s potential to conflict with the individual policies contained in these more technical elements is discussed in the appropriate topical sections of this initial study.

Objectives of the general plan’s urban design element that are applicable to the proposed project include emphasizing the characteristic pattern which gives the city and its neighborhoods an image, a sense of purpose, and a means of orientation and conserving resources which provide a sense of nature, continuity with the past, and freedom from overcrowding.
The proposed project would include demolition of the existing building at 500 Turk Street, which is considered a historic resource under the California Environmental Quality Act (CEQA) because, as described above, it has been determined to be individually eligible for listing on the CRHR, due to its longevity of use as a tire and battery shop and its innovative design that incorporates an open vehicle maneuvering area at the corner. The planning department has also determined that the marquee signage on the project site also contributes to the eligibility of the resource. For these reasons, the proposed project 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. The associated physical environmental impacts that could result from this conflict will be discussed in the EIR.

The 2014 Housing Element establishes the City’s overall housing policies. California State Housing Element law (California Government Code sections 65580 et seq.) requires each local jurisdiction to adequately plan for and address the housing needs of all segments of its population in order to attain the region’s share of projected statewide housing goals. This law requires local governments to plan for their existing and projected housing needs by facilitating the improvement and development of housing and removing constraints on development opportunities. San Francisco’s 2014 Housing Element was required to plan for an existing and projected housing need of 28,869 new dwelling units. A particular focus of the housing element is to create and retain affordable housing, which reflects intense demand for such housing, a growing economy (which itself puts increasing pressure on the existing housing stock), and a constrained supply of land (necessitating infill development and increased density). In general, the housing element supports projects that increase the city’s housing supply (both market-rate and affordable housing), especially in areas that are close to the city’s job centers and are well served by transit. The proposed project, which is a residential project consisting of 107 affordable dwelling units (108 units total) and ground floor commercial uses, would not conflict with any objectives or policies in the housing element and would implement various policies related to increasing production of housing, particularly affordable, supportive and family housing.

Except for the potential conflict related to the demolition of the building on the project site, which is considered a historic resource under CEQA due to its eligibility for listing on the CRHR, the
proposed project would not obviously or substantially conflict with any goals, policies, or objectives of the general plan. A potential or actual conflict between a proposed project and a general plan policy does not, in itself, indicate a significant effect on the environment within the context of CEQA. Any associated physical environmental impacts that could result from such potential conflicts are analyzed in this initial study (or will be analyzed in the EIR). Again, potential conflicts with the general plan are considered by city decision-makers (typically the planning commission, planning department, and/or zoning administrator) independently of the CEQA process as part of their decision to approve or disapprove a proposed project.

**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. The priority policies are also incorporated into the preamble to the general plan, which provides that the priority policies “shall be the basis upon which inconsistencies in the General Plan are resolved.” The priority policies are related to: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character; (3) preservation and enhancement of affordable housing; (4) discouragement of commuter automobiles; (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; (6) maximization of earthquake preparedness; (7) landmark and historic building preservation; and (8) protection of open space. The priority policies, which provide general policies and objectives to guide certain land use decisions, contain certain policies that relate to physical environmental issues. Where appropriate these issues are discussed in the topical sections of this initial study.

Prior to issuing a permit for any project which requires an initial study or EIR under CEQA; prior to issuing a permit for any demolition, conversion, or change of use; and prior to taking any action which requires a finding of consistency with the general plan, the city is required to find that the proposed project would generally be consistent with the priority policies. As noted above, the physical environmental effects of the project as they may relate to the priority policies are addressed in the analyses in this initial study or will be discussed in the EIR.
The proposed demolition of the existing building on the project site, which has been identified as a historical resource under CEQA, could be inconsistent with the above policy that calls for the preservation of landmarks and historic buildings. However, the proposed project would provide affordable housing, create neighborhood-serving retail uses, and discourage use of commuter automobiles. The proposed project would not conflict with other general plan policies, including the other priority policies added by the Accountable Planning Initiative. Independent of the environmental review process, the planning department’s analysis of the proposed project will include a more detailed analysis regarding general plan and priority policy consistency for the city decision-makers’ consideration.

Other Local Plans and Policies

In addition to the general plan, the planning code and zoning maps, and the Accountable Planning Initiative, other local plans and policies that are relevant to the proposed project are discussed below.

- In November 2014, voters approved Proposition K, San Francisco’s Affordable Housing Policy, which established policies to achieve the Mayor’s housing goals. By 2020, the City will help to construct or rehabilitate at least 30,000 homes, more than 50 percent of which will be affordable for middle-income households, with at least 33 percent affordable to low- and moderate-income households. Among other policies related to funding strategies, regular reviews of affordable to market-rate housing production, and annual progress hearings, the City will also attempt to ensure that 33 percent of new housing in areas that are rezoned to provide more residential development is affordable to low- and moderate-income households. To further advance the goals of the Affordable Housing Policy, Proposition A, the 2015 Affordable Housing Bond, was approved by voters in 2015. The $310 million bond provides capital investment to help stabilize existing neighborhoods and increase the livability of the city.

- The San Francisco Sustainability Plan is a blueprint for achieving long-term environmental sustainability by addressing specific environmental issues including, but not limited to, air quality, climate change, energy, ozone depletion, and transportation. The goal of the San Francisco Sustainability Plan is to enable the people of San Francisco to meet their present needs without sacrificing the ability of future generations to meet their own needs.
The Climate Action Plan for San Francisco: Local Actions to Reduce Greenhouse Emissions is a local action plan that examines the causes of global climate change and the human activities that contribute to global warming, provides projections of climate change impacts on California and San Francisco based on recent scientific reports, presents estimates of San Francisco’s baseline greenhouse gas emissions inventory and reduction targets, and describes recommended actions for reducing the city’s greenhouse gas emissions. The 2013 Climate Action Strategy is an update to this plan.

The Transit First Policy (City Charter, section 8A.115) is a set of principles that underscore the city’s commitment to prioritizing travel by transit, bicycle, and on foot over travel by private automobile. These principles are embodied in the objectives and policies of the transportation element of the general plan. All city boards, commissions, and departments are required by law to implement transit first principles in conducting the city’s affairs.

The San Francisco Bicycle Plan is a citywide bicycle transportation plan that identifies short-term, long-term, and other minor improvements to San Francisco’s bicycle route network. The overall goal of the San Francisco Bicycle Plan is to make bicycling an integral part of daily life in San Francisco.

The San Francisco Better Streets Plan consists of illustrative typologies, standards, and guidelines for the design of San Francisco’s pedestrian environment, with the central focus of enhancing the livability of the city’s streets.

The Transportation Sustainability Fee Ordinance requires payment of the applicable transportation sustainability fee (TSF), as applicable to the project, for non-residential uses in excess of 800 gross square feet. TSF funds may be used to improve transit services and pedestrian and bicycle facilities. The TSF does not apply to affordable housing projects.

The proposed project, as described and analyzed in this initial study, would not obviously or substantially conflict with these local plans and policies and would support goals and policies related to the provision of affordable housing. Independent of the environmental review process, the planning department’s analysis of the proposed project will include a more detailed analysis regarding general plan and priority policy consistency for city decision-maker consideration.
Regional Plans and Policies

There are several regional planning agencies whose environmental, land use, and transportation plans and policies consider the growth and development of the nine-county San Francisco Bay Area. Some of these plans and policies are advisory, and some include specific goals and provisions that must be considered when evaluating a project under CEQA. The regional plans and policies that are relevant to the proposed project are discussed below.

- The principal regional planning documents and the agencies that guide planning in the nine-county Bay Area include Plan Bay Area, the region’s first sustainable communities strategy, developed in accordance with Senate Bill 375 and adopted jointly by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) on July 18, 2013. Plan Bay Area is a long-range land use and transportation plan that covers the period from 2010 to 2040. Plan Bay Area calls for concentrating housing and job growth around transit corridors, particularly within areas identified by local jurisdictions as priority development areas. In addition, Plan Bay Area specifies strategies and investments for maintaining, managing, and improving the region’s multi-modal transportation network and proposes transportation projects and programs to be implemented with reasonably anticipated revenue. Plan Bay Area will be updated every four years;

- Plan Bay Area includes the population and employment forecasts from ABAG’s Projections 2013, which is an advisory policy document used to assist in the development of local and regional plans and policy documents, and MTC’s 2040 Regional Transportation Plan, which is a policy document that outlines transportation projects for highway, transit, rail, and related uses through 2040 for the nine Bay Area counties;

- The Regional Housing Needs Plan for the San Francisco Bay Area: 2014–2022 reflects projected future population growth in the Bay Area region as determined by ABAG and addresses housing needs across income levels for each jurisdiction in California. All of the Bay Area’s 101 cities and nine counties are given a share of the Bay Area’s total regional housing need. The Bay Area’s regional housing need is allocated to each jurisdiction by the
California Department of Housing and Community Development and finalized through negotiations with ABAG;

- The Bay Area Air Quality Management District (BAAQMD) 2017 Clean Air Plan: Spare the Air, Cool the Climate updates the 2010 Clean Air Plan and provides a regional strategy to protect public health and protect the climate by establishing the groundwork to reduce GHG emissions 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050; and

- The San Francisco Regional Water Quality Control Board Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) is a master water quality control planning document. It designates beneficial uses and water quality objectives for waters of the state, including surface waters and groundwater, and includes implementation programs to achieve water quality objectives.

The proposed project, as described and analyzed in this initial study, would not obviously or substantially conflict with these regional plans and policies, due in part to the relatively small size and infill nature of the proposed project.

Summary

As discussed above, the proposed project could potentially conflict with a policy of the urban design element of the general plan and the Accountable Planning Initiative related to the preservation of historic resources. As also discussed above, the proposed project would also implement various policies of the general plan, particularly those related to infill development, residential housing production, and providing affordable, supportive and family housing. City decision-makers will evaluate the consistency of the proposed project with general plan policies and applicable planning code regulations, and will make a consistency determination as part of the project approval process.

G. SUMMARY OF ENVIRONMENTAL EFFECTS

The following section provides a summary of the environmental effects identified in this initial study.
Senate Bill 743 and Public Resources Code Section 21099

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. Among other provisions, SB 743 amended CEQA by adding Public Resources Code section 21099 regarding the analysis of aesthetics and parking impacts for certain urban infill projects in transit priority areas, as discussed below.

Aesthetics and Parking Analysis

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

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

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

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9 A “transit priority area” is defined as an area within 0.5 miles of an existing or planned major transit stop. A “major transit stop” is defined in California Public Resources Code section 21064.3 as a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. A map of San Francisco transit priority areas can be found online at http://sfmea.sfplanning.org/Map%20of%20San%20Francisco%20Transit%20Priority%20Areas.pdf, accessed June 23, 2017.

10 San Francisco Planning Department, Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis, Case No. 2016-01340ENV, 500 Turk Street, June 8, 2017.
Public Resources Code section 21099(e) states that a lead agency maintains the authority to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers and that aesthetic impacts do not include impacts on historical or cultural resources. As such, there will be no change in the planning department’s methodology related to design review and the analysis of potential impact on a historic resource under CEQA.

**Effects Found to Be Potentially Significant**

This initial study evaluates the proposed 500 Turk Street Project to determine whether it would result in significant environmental impacts. 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, the topic for which there are project-specific effects that have been determined to be potentially significant is:

- Cultural resources (historic architectural resources only).

This environmental topic will be evaluated in an EIR prepared for the proposed project.

**Effects Found Not to Be Significant**

The following potential individual and cumulative environmental effects were determined to be either less than significant or would be reduced to a less-than-significant level through recommended mitigation measures included in this initial study:

- Land use and land use planning (all topics),
- Population and housing (all topics),
- Cultural resources (archeological resources, human remains, tribal cultural resources),
- Transportation and circulation (all topics),
- Noise (all topics),
- Air quality (all topics),
- Greenhouse gas emissions (all topics),
• Wind and shadow (all topics),
• Recreation (all topics),
• Utilities and service systems (all topics),
• Public services (all topics),
• Biological resources (all topics),
• Geology and soils (all topics),
• Hydrology and water quality (all topics),
• Hazards and hazardous materials (all topics),
• Mineral and energy resources (all topics), and
• Agricultural and forest resources (all topics).

These items are discussed with mitigation measures, where appropriate, in Section H, Evaluation of Environmental Effects, p. 37, of this initial study, and require no environmental analysis in the EIR. All mitigation measures identified, including those for archeological and tribal resources, construction noise, and construction-period air quality emissions are listed in Section I, Mitigation Measures and Improvement Measures, p. 157, have been agreed to by the project sponsor, and will be incorporated into the proposed project. For items designated “not applicable” or “no impact,” the conclusions regarding potential significant environmental effects are based upon field observations, staff and consultant experience and expertise on similar projects, and/or standard reference materials available within the San Francisco Planning Department, such as the California Natural Diversity Database and maps published by the California Department of Fish and Wildlife, the California Division of Mines and Geology Mineral Resource Zone designations, and the California Department of Conservation’s Farmland Mapping and Monitoring Program. For each checklist item, the evaluation has considered both individual and cumulative impacts of the proposed project.
H. EVALUATION OF ENVIRONMENTAL EFFECTS

<table>
<thead>
<tr>
<th>Topics:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
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<th>No Impact</th>
<th>Not Applicable</th>
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<tbody>
<tr>
<td>1. LAND USE AND LAND USE PLANNING—Would the project:</td>
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<td>a) Physically divide an established community?</td>
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<tr>
<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 impact)*

The division of an established community would typically involve the construction of a barrier to neighborhood access (such as a new freeway segment) or the removal of a means of access (such as a bridge or roadway). The proposed project would result in the demolition of an existing one- to two-story tire and automobile service building and removal of all existing on-site pavements and signage and construction of an eight-story, 79-foot-tall building with a total of 108 residential units and approximately 2,600 square feet of ground floor commercial space. The proposed project would be incorporated into the existing street configuration and would not alter the established street grid or permanently close any streets or impede pedestrian or other travel through the neighborhood. Although portions of the sidewalks adjacent to the proposed project would likely be closed for periods of time during project construction, these closures would be temporary in nature and sidewalk access would be restored. The proposed project would not construct a physical barrier to neighborhood access or remove an existing means of access, such as a bridge or roadway which would create an impediment to the passage of persons or vehicles. As such, the proposed project would not physically divide an established community.

The established community surrounding the project site includes a variety of uses ranging from mid- to high-rise commercial, office, institutional, residential, and hotel uses. The existing site is currently occupied by a tire and automotive services company. The proposed project would introduce new
residential and commercial uses within the mixed-use area and would not alter the land use pattern of the immediate area. The proposed project would not introduce any new land uses, such as industrial uses, that would either create potential conflicts through incompatible uses or result in disruptions to the community’s established land use patterns.

For these reasons, the proposed project would not physically divide an established community. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

Impact LU-2: The proposed project would not conflict with applicable land use plans, policies, or regulations of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. *(less-than-significant impact)*

The proposed project would not substantially conflict with applicable plans, policies, or regulations, such that an adverse physical change would result. Land use impacts are also considered to be significant if the proposed project would conflict with any plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Environmental plans and policies are those, like the Bay Area Air Quality Management District 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 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 F, Compatibility with Zoning and Plans, pp. 24–33, 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. However, the proposed project would not obviously or substantially conflict with any adopted environmental plans or policies that 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 and these impacts, in and of themselves, would not result in adverse physical effects on the environment. Therefore, the proposed project would have a less-than-significant impact with regard to conflicts with existing plans and zoning and no mitigations are necessary.
Impact C-LU-1: The proposed project would not create a considerable contribution to cumulative significant land use impacts. *(less-than-significant impact)*

Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. **Section E., Cumulative Setting**, pp. 21–23, identifies the cumulative projects located within 0.25 miles (the vicinity) of the project site. 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 are 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. In addition, the cumulative projects would not obviously or substantially conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. These development projects would introduce new infill residential with ground floor commercial uses in the project vicinity or expand existing residential and commercial uses. This cumulative development would represent an incrementally more dense urban fabric in the project vicinity but would not introduce any incompatible uses, such as industrial uses, that would have a substantial impact on land uses in the project vicinity within 0.25 miles of the site. Thus, the proposed project, in combination with past, present, and reasonably foreseeable future projects, would result in a less-than-significant cumulative land use impact, and no mitigation measures are necessary.

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<tr>
<td>2. POPULATION AND HOUSING—Would the project:</td>
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<td>![x]</td>
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<tr>
<td>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)?</td>
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2. POPULATION AND HOUSING—Would the project:

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

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

<table>
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Impact PH-1: The proposed project would not directly or indirectly induce substantial population growth in San Francisco. *(less-than-significant impact)*

In general, a project would be considered growth-inducing if its implementation would result in a substantial population increase and/or new development that might not occur if the project were not approved and implemented. The proposed project would include demolition of an existing tire and automobile services center and existing on-site pavements and signage. The addition of 108 residential units would increase the residential population on the project site by approximately 157 persons, resulting in a direct increase in population on the project site and contributing to anticipated population growth in both the neighborhood and citywide context.

The addition of 157 residents only represents an incremental increase in the population of the larger neighborhood or citywide. The 2015 U.S. Census indicates that the population in the project vicinity (Census Tract 124.02) is approximately 3,600 persons. The proposed project would increase the population near the project site by approximately 4.36 percent. Within the citywide context, the proposed project would increase the city’s population by .02 percent, based on a 2015 population of

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11 The project site is located in Census Tract 124.02, which is generally bounded by Ellis Street and Golden Gate Avenue to the north, Larkin Street and Leavenworth Street to the east, Market Street to the south, and Van Ness Avenue to the west. The population calculation is based on Census 2015 data, which estimates 1.45 persons per household in Census Tract 124.02. It should be noted that this census tract has somewhat smaller households than the citywide average of 2.26 persons per household.

12 The population estimate is based on data from the 2015 Census (ACS 2015 5-year) for Census Tract 124.02.
840,763. The proposed project would not indirectly induce substantial population growth in the project area because it would be located on an infill site in an urbanized area and would not involve any extensions to area roads or other infrastructure that could enable additional development in currently undeveloped areas. The proposed project would include approximately 7 employees associated with the ground floor commercial space and approximately 11 employees associated with the residential use, for a total of 18 employees. However, the increase in employees only represents an incremental increase in employment on the site compared to the existing six employees at the existing business on the site. Therefore, the proposed project would not directly or indirectly induce substantial population growth in San Francisco. This impact would be less than significant and no mitigation measures are necessary. This topic will not be addressed in the EIR.

Impact PH-2: The proposed project would not displace substantial numbers of existing housing units or people and would not create demand for additional housing elsewhere. (less-than-significant impact)

The project site is currently developed with a one- to two-story tire and automobile service building, and there are no existing housing units on the project site. Therefore, implementation of the proposed project would not displace existing housing units or residents. The proposed project would result in the development of 108 new residential units and 2,600 square feet of commercial space. The proposed commercial space on the site is intended to serve the existing neighborhood and would not generate demand for additional housing citywide. Therefore, this impact would be less than significant and no mitigation measures are necessary. This topic will not be addressed in the EIR.

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

The past, present, and reasonably foreseeable projects within the vicinity of the proposed project would add approximately 2,360 new residents within approximately 1,044 new dwelling units into the project area; and would result in a total of approximately 2,517 new residents and approximately 1,152 new dwelling units in combination with the proposed project.\(^{16}\) An additional 36,860 square feet of ground floor commercial space would be added to the project vicinity, for a total of approximately 39,460 square feet of commercial space in combination with the proposed project. As described under Impact PH-1, the proposed project’s individual contribution to population and employment growth would not be considerable and represents a minimal percentage of overall population increase within the neighborhood and citywide. The population of San Francisco is projected to increase by approximately 280,490 persons for a total of 1,085,725 persons by 2040.\(^{17}\) The residential population introduced as a result of the proposed project would constitute less than 1 percent of projected citywide growth. Thus, this population increase, including the population growth related to the proposed project, would be accommodated within the planned growth for San Francisco. Furthermore, these additional residential units would provide more opportunities for housing, particularly affordable housing, which is a citywide need. Additionally, 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 as the majority of the approved and proposed projects would redevelop existing vacant or underutilized buildings and sites with more intense land uses, including housing.

\(^{16}\) Assumes the City of San Francisco average of 2.26 persons per household.

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 related to population and housing.

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**Impact CP-1: Implementation of the proposed project would result in the demolition of the 500 Turk Street building, a historical resource for the purposes of CEQA. (potentially significant impact)**

As discussed in **Section A, Project Site**, pp. 2–7, the proposed project would result in the demolition of a building that houses a tire and automotive services company and associated signage. The building was evaluated in 2010 as part of the Van Ness Auto Row Support Structures Survey (2010 Survey)¹⁸ and assigned Status Code of 3CS, meaning that it appears eligible for inclusion in the CRHR as an individual property through survey evaluation.

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A cultural resource is evaluated under four CRHR criteria to determine its historical significance. A resource must be significant in accordance with one or more of the following criteria:

- Criterion 1 (Events): Is associated with events that have made a significant contribution to the broad pattern of California’s history and cultural heritage;
- Criterion 2 (Persons): Is associated with the lives of persons important in our past;
- Criterion 3 (Architecture): Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Criterion 4 (Information Potential): Has yielded, or may be likely to yield, information important in prehistory or history.

The 2010 Survey found the building on the project site appeared eligible for inclusion in the CRHR under Criteria 1 (events) and 3 (architecture). Under Criterion 1 the building was found to be significant for its association with the development of a collection of businesses on and around Van Ness Avenue that catered to the automobile industry. Within this context, the planning department’s Historic Resources Evaluation Response (HRER) found that the building is specifically significant for the longevity of its use as a tire and battery shop. The building is also listed by the planning department as a Category A.1 Historic Resource (resource listed on or formally determined to be eligible for the CRHR). The building on the project site appears eligible for individual inclusion in the CRHR under Criterion 3 for its then innovative design that incorporates an open vehicle maneuvering area at the corner. This design made a decisive break from the form that urban industrial buildings had previously taken, and instead responded thoughtfully to the specific needs of the business it was meant to house and for its Art Deco architectural qualities.

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20 Cleemann, Jorgen G., Preservation Planner, San Francisco Planning Department, Historic Resources Evaluation Response, 500 Turk Street, June 5, 2017.

21 Ibid.
Therefore, the building on the project site qualifies as an “historical resource” under CEQA. No other cultural resources are located within the project site. The proposed demolition of the building is a potentially significant impact because of the effect to the historical significance and integrity of this resource. Potential adverse effects to this historical resource will be evaluated in the EIR.

Impact CP-2: The proposed project could result in a substantial adverse change in the significance of an archeological resource pursuant to section 15064.5 and human remains. (less-than-significant with mitigation incorporated)

This section discusses archeological resources, both as historical resources according to section 15064.5 as well as unique archeological resources as defined in section 21083.2(g).

The potential for encountering archeological resources is determined by several relevant factors, including archeological sensitivity criteria and models, local geology, site history, and the extent of a potential project’s soils disturbance/modification, as well as any documented information on known archeological resources in the area. The project site is underlain by fill, dune sand, a marsh deposit, and very dense sand to the maximum explored depth of 61.5 feet below the ground surface.22 There are no documented or recorded archeological sites in the immediate vicinity of the proposed project. A planning department archaeologist completed a preliminary archeological review (PAR) for the proposed project.23 The PAR determined that the project site is located in an area considered to have low sensitivity for prehistoric archeological resources; however, potentially significant archeological resources associated with mid to late 19th century development could be impacted by project activities, if such materials are encountered during project construction activities.

In order to reduce the potential impact to historic archeological resources to a less-than-significant level, Mitigation Measure M-CP-2, Archeological Testing, is required. This measure requires

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23 Vanderslice, Allison, Preservation Planner, San Francisco Planning Department, Environmental Planning Preliminary Archeological Review, 500 Turk Street, July 6, 2017.
preparation of an archeological testing plan (ATP) to identify any archeological resources that may be present at the site prior to ground disturbing activities.

**Mitigation Measure M-CP-2: Archeological Testing.** Based on a reasonable presumption that archeological resources may be present within the project area, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of an archeological consultant from the rotational Department Qualified Archeological Consultants List (QACL) maintained by the Planning Department archeologist. The project sponsor shall contact the Department archeologist to obtain the names and contact information for the next three archeological consultants on the QACL. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant’s work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines section 15064.5(a) and (c).
Consultation with Descendant Communities. On discovery of an archeological site24 associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group, an appropriate representative25 of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to offer recommendations to the ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Final Archeological Resources Report shall be provided to the representative of the descendant group.

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

At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the ERO. If based on the archeological testing program the archeological consultant finds that significant archeological resources may be present, the ERO in consultation with the archeological consultant shall determine if additional

24 The term “archeological site” is intended here to minimally include any archeological deposit feature, burial, or evidence or burial.

25 An “appropriate representative” of the descendant group is here defined to mean, in the case of Native Americans, any individual listed in the current Native American Contact List for the City and County of San Francisco maintained by the California Native American Heritage Commission and in the case of the Overseas Chinese, the Chinese Historical Society of America. An appropriate representative of other descendant groups should be determined in consultation with the Department archeologist.
measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or an archeological data recovery program. No archeological data recovery shall be undertaken without the prior approval of the ERO or the Planning Department archeologist. If the ERO determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

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

B. A data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

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

- The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils-disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, site remediation, etc., shall require archeological monitoring because of the risk these activities pose to potential archeological resources and to their depositional context;

- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;
• The archeological monitor(s) shall be present on the project area according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;

• The archeological monitor shall record and be authorized to collect soil samples and artefactual/ecofactual material as warranted for analysis;

• If an intact archeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/construction activities and equipment until the deposit is evaluated. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO.

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

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

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

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

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

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

Final Report — Description of proposed report format and distribution of results.

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

Human Remains and Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner’s determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archeological consultant, project sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects.
Final Archeological Resources Report. The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

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, one unbound and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

With implementation of Mitigation Measure M-CP-2, Archeological Testing, the proposed project would have a less-than-significant impact on prehistoric or historical archeological resources and human remains interred outside of a formal cemetery, and this topic will not be discussed in the EIR.

Impact CP-3: Construction activities for the proposed project could result in the disturbance of tribal resources, should such resources exist beneath the project site. (less-than-significant impact)

CEQA Guidelines section 21074.2 requires the lead agency to consider the effects of a project on tribal cultural resources. As defined in section 21074, tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are listed, or determined to be eligible for listing, on the national, state, or local register of historical resources. Based on discussions with Native American tribal representatives, in San Francisco, prehistoric archeological resources are presumed to be potential tribal cultural resources. A
tribal cultural resource is adversely affected when a project causes a substantial adverse change in the resource’s significance.

Pursuant to CEQA Guidelines section 21080.3.1(d), within 14 days of a determination that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency is required to contact the Native American tribes that are culturally or traditionally affiliated with the geographic area in which the project is located. Notified tribes have 30 days to request consultation with the lead agency to discuss potential impacts on tribal cultural resources and measures for addressing those impacts. On July 7, 2017, the planning department contacted Native American individuals and organizations for the San Francisco area, providing a description of the project and requesting comments on the identification, presence and significance of tribal cultural resources in the project vicinity.

No Native American tribal representatives have contacted the planning department to request consultation. Department staff has determined that the proposed project would not be expected to affect tribal cultural resources, including prehistoric archeological resources. Therefore, the proposed project would have a less-than-significant impact on previously unknown tribal cultural resources

**Impact C-CP-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 impact)*

The proposed project would result in the demolition of a historic architectural resource that houses a tire and automotive services company and is considered to be individually eligible for listing on the CRHR due to its longevity of use as a tire and battery shop and its then innovative design that incorporates an open vehicle maneuvering area at the corner and related signage. 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 historic resource impacts. This topic will be addressed in the EIR.
Impact C-CP-2: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity could result in a substantial adverse change in the significance of previously undiscovered archeological resources and human remains, including those interred outside of formal cemeteries, should such resources exist on or beneath the project site. (less-than-significant with mitigation incorporated)

Archeological resources and human remains are non-renewable and finite, and all adverse effects to subsurface archeological resources and tribal cultural resources have the potential to erode a dwindling cultural/scientific resource base. Past, present, and reasonably foreseeable future development projects within San Francisco and the Bay Area region would include construction activities that could disturb archeological resources and tribal cultural resources and could contribute to cumulative impacts related to the loss of significant history, scientific, and cultural information about California, Bay Area, and San Francisco history and prehistory including the history and prehistory of Native American peoples. Similar to the proposed project, development projects within San Francisco would be subject to the city’s standard archeological mitigation measures, thereby reducing the potential for cumulative archeological-related impacts.

The project’s impact, in combination with other projects in the area that would also involve ground disturbance and could also encounter previously recorded or unrecorded archaeological resources and human remains, could result in a significant cumulative impact. However, because no previously recorded archaeological or human remains have been previously identified at or adjacent to the project site, the project is unlikely to make a cumulatively considerable contribution to the loss of such resources. Additionally, implementation of Mitigation Measure M-CP-2, Archeological Testing, would ensure that the proposed project’s contribution to cumulative impacts would not be cumulatively considerable. Therefore, this impact would be less than significant, and these topics will not be discussed in the EIR.
4. TRANSPORTATION AND CIRCULATION—Would the project:

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

Setting

Site Circulation, Access, and Parking

The project site is located in San Francisco's Tenderloin neighborhood and is located within a developed city block bounded by Eddy Street to the north, Larkin Street to the east, Turk Street to the south, and Polk Street to the west. The site is located at the northwest corner of the Larkin Street and Turk Street intersection at 500 Turk Street.
Regional vehicular access to the project site is provided by Interstate 280 (I-280) and Interstate 80 (I-80) to the southeast and U.S. Highway 101 (U.S. 101) to the west. Local streets in the vicinity of the site connect to I-280 and U.S. 101. Local access to the project site is currently provided by Turk Street and Larkin Street.

The project vicinity is served by public transit, with local transit service within walking distance and regional transit available approximately 0.5 miles southeast of the site. Local service is provided by Muni bus and light rail under the direction of SFMTA. Muni provides transit service within the city. Service options include bus (both diesel motor coach and electric trolley), light rail (Muni Metro), cable car, and electric streetcar lines.

Regional service to the East Bay and south of San Francisco is provided by Bay Area Rapid Transit (BART). The project site is located approximately 0.5 miles northwest of the Civic Center BART station. Service to and from the South Bay/Peninsula is provided by the Peninsula Corridor Joint Powers Board via Caltrain with the nearest station, the San Francisco Station (King Street and 4th Street), located approximately 1.5 miles southeast of the project site. In addition, the Alameda-Contra Costa County Transit District and the Golden Gate Bridge Highway and Transportation District provide bus service to the East Bay and North Bay, respectively. These services are generally routed through the Transbay Terminal, located approximately 1.7 miles east of the site. In addition, Golden Gate transit route stops are located on Van Ness Avenue, approximately one and a half blocks west of the site and at the Civic Center, approximately two blocks south of the site.

Bikeways are classified as class 1, class 2, or class 3 facilities. Class 1 bicycle facilities provide a completely separated right-of-way for the exclusive use of bicycles and pedestrians with minimized cross-flow by motorists. Class 2 bicycle facilities provide a striped lane on a street or highway. Class 3

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26 Bicycle facilities are defined by the State of California in the California Streets and Highway Code, Section 890.4.
bicycle facilities are signed bike routes that provide for shared use with motor vehicle traffic.  

Class 3 bicycle facilities are signed routes with no bike lane striping but may include other striping such as “sharrows” that allow bicyclists to share the roadway with vehicles. According to the San Francisco Bike Network Map, the closest bicycle route in the vicinity of the project site is class 2 bicycle lane along Polk Street, approximately one block west of the project site.

Background on Vehicle Miles Traveled in San Francisco and Bay Area

In January 2016, the California Governor’s Office of Planning & Research (OPR) published for public review and comment the Revised Proposal on Updates to CEQA Guidelines on Evaluating Transportation Impacts in CEQA (proposed transportation impact guidelines) recommending that transportation impacts for projects be measured using a vehicle miles traveled (VMT) metric. VMT measures the amount and distance that a project might cause people to drive, accounting for the number of passengers within a vehicle. OPR’s proposed transportation impact guidelines provides substantial evidence that VMT is an appropriate standard to use in analyzing transportation impacts to protect environmental quality and a better indicator of greenhouse gas, air quality, and energy impacts than automobile delay. Acknowledging this, the San Francisco Planning Commission Resolution 19579:

- Found that automobile delay, as described solely by level of service, or similar measures of vehicular capacity or traffic congestion, shall no longer be considered a significant impact on the environment pursuant to CEQA, because it does not measure environmental impacts and therefore it does not protect environmental quality.

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• Directed the Environmental Review Officer to remove automobile delay as a factor in determining significant impacts pursuant to CEQA for all guidelines, criteria, and list of exemptions, and to update the Transportation Impact Analysis Guidelines for Environmental Review.

• Directed the Environmental Planning Division and Environmental Review Officer to replace automobile delay with VMT criteria which promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses; and consistent with proposed and forthcoming changes to CEQA Guidelines by OPR.

Planning Commission Resolution 19579 became effective immediately for all projects that have not received a CEQA determination and for all projects that have previously received CEQA determinations, but require additional environmental analysis.

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

Given these travel behavior factors, San Francisco has a lower VMT ratio than the nine-county San Francisco Bay Area region. In addition, some areas of the city have lower VMT ratios than other areas of the city. These areas of the city can be expressed geographically through transportation analysis zones (TAZs). TAZs are used in transportation planning models for transportation analysis and other planning purposes. The zones vary in size from single city blocks in the downtown core, multiple blocks in outer neighborhoods, to even larger zones in historically industrial areas like the Hunters Point Shipyard.
The San Francisco County Transportation Authority (the transportation authority) uses the San Francisco Chained Activity Model Process (SF-CHAMP) to estimate VMT by private automobiles and taxis for different land use types. Travel behavior in SF-CHAMP is calibrated based on observed behavior from the California Household Travel Survey 2010-2012, Census data regarding automobile ownership rates and county-to-county worker flows, and observed vehicle counts and transit boardings. SF-CHAMP uses a synthetic population, which is a set of individual actors that represents the Bay Area’s actual population, who make simulated travel decisions for a complete day. The transportation authority uses tour-based analysis for office and residential uses, which examines the entire chain of trips over the course of a day, not just trips to and from the project. For retail uses, the transportation authority uses trip-based analysis, which counts VMT from individual trips to and from the project (as opposed to an 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.31,32

Impact TR-1: The proposed project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system; would not conflict with an applicable congestion management program or other standards established by the county congestion management agency for designated roads or highways; and 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 impact)

Trip Generation

The proposed project would construct an eight-story building with a total of 108 residential units and approximately 2,600 square feet of ground floor commercial space. A transportation study

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

determination\textsuperscript{33} was prepared for the proposed project and identified that the proposed project would generate 162 daily vehicle trips, with 23 trips occurring during the PM peak hours. These trips would not all be net new as there are existing tire and automobile service use trips. However, for purposes of the analysis, all trips are conservatively treated as net new trips.

**VMT Analysis/Operation**

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

For residential projects, a project would generate substantial additional VMT if it exceeds the regional household VMT per capita minus 15 percent.\textsuperscript{34} As documented in the proposed transportation impact guidelines, a 15 percent threshold below existing development is “both reasonably ambitious and generally achievable.”\textsuperscript{35}

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 significance. OPR recommends that if a project or land use proposed as part of the project meets 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. These screening criteria and how they are applied in San Francisco are described below:


\textsuperscript{34} OPR’s proposed transportation impact guidelines state 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. San Francisco’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.

• 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 required 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 2015 San Francisco Congestion Management Program does not include a trip threshold for studying consistency. Therefore, the planning department uses the 100 vehicle trip per day screening criterion as a level at which projects generally would not generate a substantial increase in VMT.

• Proximity to Transit Stations. OPR recommends that residential, retail, and office projects, as well as projects that are a mix of these uses, proposed within 0.5 miles of an existing major transit stop (as defined by CEQA Guidelines section 21064.3) or an existing stop along a high quality transit corridor (as defined by CEQA Guidelines section 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\(^{36}\) 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.\(^{37}\)

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\(^{36}\) Floor area ratio means the ratio of gross building area of the development, excluding structured parking areas, proposed for the project divided by the net lot area.

\(^{37}\) 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.
The existing average daily VMT per capita for the transportation analysis zone the project site is located in, TAZ 299, is below the existing regional average daily VMT. In TAZ 299, the average daily VMT per capita for residential uses is 2.3, which is about 87 percent below the existing regional average daily VMT per capita for residential uses of 17.2.

Therefore, the project site is located within an area of the city where the existing VMT is more than 15 percent below the regional VMT, and the proposed project land uses would not generate substantial additional VMT. Furthermore, the project meets the proximity to transit stations screening criterion, which also indicates that the proposed project’s uses would not cause substantial additional VMT.

**Construction**

Construction of the proposed project would be expected to take approximately 22 months. During this period, temporary and intermittent transportation impacts would result from truck movements to and from the project site during excavation and construction activities associated with the proposed building. Construction activities would generate construction worker trips to and from the project site and a temporary demand for parking and public transit.

Prior to construction, the project sponsor and construction contractor(s) would be required to meet with Public Works and SFMTA staff to develop and review truck routing plans for demolition, disposal of excavated materials, materials delivery and storage, as well as staging for construction vehicles. Additionally, any proposed vehicle lane and sidewalk closures and other temporary traffic and transportation changes are subject to review by the SFMTA’s Interdepartmental Staff Committee

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38 The Map-Based Screening for Residential, Office, and Retail Projects was applied to the proposed project. The project site is located within TAZ 711, which is within an area of the city where the existing VMT is more than 15 percent below the regional VMT thresholds, as documented in Executive Summary Resolution Modifying Transportation Impact Analysis, Attachment F (Methodologies, Significance Criteria. Thresholds of Significance, and Screening Criteria for Vehicle Miles Traveled and Induced Automobile Travel Impacts), Appendix A (SFCTA Memo), March 3, 2016; http://commissions.sfplanning.org/cpcpackets/Align-CPC%20exec%20summary_20160303_Final.pdf, accessed June 23, 2017.

39 San Francisco Planning Department, Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis, Case No. 2016-01340ENV, 500 Turk Street, June 8, 2017.
on Traffic and Transportation (ISCOTT) and would require approval at a public meeting. ISCOTT is an interdepartmental committee that includes representatives from Public Works, SFMTA, Police Department, Fire Department, and the Planning Department. The construction contractor would be required to comply with the City of San Francisco’s Regulations for Working in San Francisco Streets (the Blue Book), including those regarding sidewalk and lane closures. In addition to the regulations in the Blue Book, the contractor would be responsible for complying with all city, state and federal codes, rules and regulations.

Due to the temporary nature of the construction activities, construction-related impacts on transportation and circulation would be less than significant. However, **Improvement Measure I-TR-1: Construction Management Plan and Public Updates** is recommended to reduce the less-than-significant construction-related transportation impacts of the proposed project.

**Improvement Measure I-TR-1: Construction Management Plan and Public Updates.** The project sponsor or the project sponsor’s contractor should comply with the following:

*Construction Coordination:* To reduce potential conflicts between construction activities and pedestrians, bicyclists, transit and vehicles at the project site, the project sponsor should require that the contractor prepare a Construction Management Plan for the project construction period. The preparation of a Construction Management Plan could be a requirement included in the construction bid package. Prior to finalizing the Plan, the project sponsor/ construction contractor(s) should meet with San Francisco Public Works (Public Works), SFMTA, the Fire Department, Muni Operations and other City agencies to coordinate feasible measures to include in the Construction Management Plan to reduce traffic congestion, including measures to reduce potential traffic, bicycle, and transit disruption and pedestrian circulation effects during construction of the proposed project. This review should consider other ongoing construction in the project vicinity.
Carpool, Bicycle, Walk and Transit Access for Construction Workers: To minimize parking demand and vehicle trips associated with construction workers, the construction contractor could include as part of the Construction Management Plan methods to encourage carpooling, bicycle, walk and transit access to the project site by construction workers (such as providing transit subsidies to construction workers, providing secure bicycle parking spaces, participating in free-to-employee ride matching program from www.511.org, participating in emergency ride home program through the City of San Francisco (www.sferh.org), and providing transit information to construction workers.

Construction Worker Parking Plan: As part of the Construction Management Plan that could be developed by the construction contractor, the location of construction worker parking could be identified as well as the person(s) responsible for monitoring the implementation of the proposed parking plan. The use of on-street parking to accommodate construction worker parking could be discouraged. All construction bid documents could include a requirement for the construction contractor to identify the proposed location of construction worker parking. If on-site, the location, number of parking spaces, and area where vehicles would enter and exit the site could be required. If off-site parking is proposed to accommodate construction workers, the location of the off-site facility, number of parking spaces retained, and description of how workers would travel between an off-site facility and the project site could be required.

Project Construction Updates for Adjacent Businesses and Residents: To minimize construction impacts on access to nearby institutions and businesses, the project sponsor could provide nearby residences and adjacent businesses with regularly-updated information regarding project construction, including construction activities, peak construction vehicle activities (e.g., concrete pours), travel lane closures, and parking lane and sidewalk closures. A regular email notice could be distributed by the project sponsor that would provide current construction information of interest to neighbors, as well as contact information for specific construction inquiries or concerns.
Conclusion

Due to the limited addition of project-related traffic (approximately 23 PM peak hour trips), the proposed project is not anticipated to result in a conflict with any established plans or policies related to transportation and circulation. In addition, as discussed above, the proposed project would meet the VMT map-based screening criteria. Implementation of the proposed project would result in less-than-significant construction-related impacts. Therefore, the proposed project would not conflict with any plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system or congestion management program. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

Impact TR-2: The proposed project would not result in substantially increased hazards due to particular design features (e.g., sharp curves or dangerous intersections) or incompatible uses. (less-than-significant impact)

The proposed project would include the construction of a new eight-story building with a total of 108 residential units and ground-floor commercial use that is considered a compatible use with the surrounding area. Access to the project site would be provided by Turk Street and Larkin Street. However, no on-site off-street parking is proposed and the existing driveways and curb cuts along Turk and Larkin streets would be removed, and a total of five new on-street parking spaces would be provided for a total of 10 on-street parking spaces, which would be distributed evenly on both streets. A 20-foot passenger loading zone would be located on Turk Street, in front of the residential lobby entrance, and a 20-foot commercial loading zone would be designated along Larkin Street in front of the service entrances. Therefore, while parking and loading would still occur on both Turk and Larkin streets, vehicles would no longer enter or exit the site on Turk or Larkin streets. Therefore, the proposed project would not include sharp curves or other roadway design elements that would create dangerous conditions. The proposed project would result in a less-than-significant impact related to hazards associated with a design feature and no mitigation is required. This topic will not be addressed in the EIR.
Impact TR-3: The proposed project would not result in inadequate emergency access. *(less-than-significant impact)*

Emergency access to the project site would remain mostly unchanged from existing conditions. Emergency service providers would continue to access the project site, as well as adjacent buildings, via Turk and Larkin streets. As discussed above, the proposed project would include minor roadway design changes in the form of driveway and curb cut removal and installation of new on-street parking spaces. A 20-foot passenger loading zone would be located on Turk Street, in front of the residential lobby entrance, and a 20-foot commercial loading zone would be designated along Larkin Street in front of the service entrances, both of which could be used by emergency vehicles in the case of an emergency. For these reasons the proposed project would not inhibit emergency vehicle access to the project site and nearby vicinity. Therefore, the proposed project’s impacts related to emergency vehicle access would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

Impact TR-4: The proposed project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities or cause a substantial increase in transit demand that cannot be accommodated by existing or proposed transit capacity or alternative travel modes. *(less-than-significant impact)*

Implementation of the proposed project would add 108 residential units to the project site, increasing the residential population on the site by approximately 157 persons, which represents only an approximately 4.36 percent increase the population near the project site (within Census Tract 124.02). Thus, the proposed project would not substantially increase the population in the project vicinity and would result in a minimal number of net new transit, pedestrian, and bicycle trips, as compared to existing conditions. Thus, the proposed project would not substantially effect the utilization of local and regional transit service, pedestrian facilities, or bicycle facilities. Therefore, the proposed project would not result in changes to the city’s transportation and circulation system that could conflict with adopted policies, plans, or programs regarding transit, bicycle, or pedestrian

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40 The population estimate is based on Census 2010 data, which estimates 1.45 persons per household in Census Tract 124.02
facilities, or otherwise decrease the performance or safety of such facilities, or cause a substantial increase in transit demand that cannot be accommodated by existing or proposed transit capacity or alternative travel modes. Furthermore, as discussed in Section F, Compatibility with Zoning and Policies, pp. 24–33, the proposed project would not conflict with adopted plans, policies, or programs related to alternative modes of transit. Therefore, this impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

Impact C-TR-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in substantial cumulative transportation impacts. (less-than-significant impact)

As discussed above under Impacts TR-1, TR-2, TR-3, and TR-4, the proposed project would result in less-than-significant impacts on traffic, emergency access, transit, pedestrians, and bicycles. While construction of the proposed project could occur concurrently with construction of cumulative development projects in the vicinity, the cumulative impacts of multiple nearby construction projects would not be cumulatively considerable, as the construction would be of temporary duration, and the project sponsor would be required to coordinate with various city departments such as SFMTA and Public Works.

Based on the foregoing, in combination with past, present, and reasonably foreseeable future projects, the proposed project would not contribute considerably to any substantial cumulative increase in VMT, impacts to the effectiveness of the circulation system, impacts related to design features or incompatible uses, inadequate emergency access, or conflicts with alternative modes of transportation. Therefore, this impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.
5. **NOISE—Would the project:**

   a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

   b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

   c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

   d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

   e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?

   f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

   g) Be substantially affected by existing noise levels?

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

**Fundamentals of Environmental Noise and Groundborne Vibration**

A project will normally have a significant effect on the environment related to noise if it would substantially increase the ambient noise levels for adjoining areas or conflict with the adopted environmental plans and goals of the community in which it is located. Noise impacts can be described in three categories. The first is audible impacts that increase noise levels noticeable to humans. Audible increases in noise levels generally refer to a change of 3.0 decibels (dB) or greater, since this level has been found to be barely perceptible in exterior environments. The second category, potentially audible, is the change in the noise level between 1.0 and 3.0 dB. This range of
noise levels has been found to be noticeable only in laboratory environments. The last category is changes in noise level of less than 1.0 dB, which are inaudible to the human ear. Only audible changes in existing ambient or background noise levels are considered potentially significant. For the purpose of this analysis, the proposed project would result in a significant noise impact if implementation of the proposed project would result in ambient existing noise levels increasing to a level greater than 3 dB and the resulting noise level is greater than the standards cited below or if the project-related increase in noise is greater than 5 A-weighted decibels (dBA), yet the resulting noise levels are within the applicable land use compatibility standards for the sensitive use.41

Vibration is an oscillatory motion through a solid medium in which the motion’s amplitude can be described in terms of displacement, velocity, or acceleration. Several different methods are used to quantify vibration. The most frequently used method to describe vibration impacts on buildings is peak particle velocity (PPV). PPV is defined as the maximum instantaneous peak of the vibration signal in inches per second (in/sec). The most frequently used method to describe the effect of vibration on the human body is the root mean square (RMS) amplitude. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (VdB) is commonly used to measure RMS.42 The decibel notation acts to compress the range of numbers required to describe vibration. The criteria for environmental impact from groundborne vibration and noise are based on the maximum RMS vibration levels for repeated events of the same source.43

Typically, groundborne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. The effects of groundborne vibration include movement of building

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41 A-weighted sound level (dBA) is the sound level obtained by use of A-weighting. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise. All sound levels in this section are A-weighted unless reported otherwise.

42 Vibration velocity level is reported in decibels relative to a level of 1x10^-6 inches per second and is denoted as VdB.

floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. The rumbling sound caused by the vibration of room surfaces is called groundborne noise, which can occur as a result of the low-frequency components from a specific steady source of vibration, such as a rail line. Receptors sensitive to vibration include structures (especially older masonry structures), people (especially residents, the elderly, and the sick), and vibration-sensitive equipment. Fragile buildings and underground facilities, in particular those that are considered historic, are included because groundborne vibration can result in structural damage. In extreme cases, high levels of vibration can damage fragile buildings or interfere with sensitive equipment. With the exception of long-term occupational exposure, vibration levels rarely affect human health. Instead, most people consider vibration to be an annoyance that can affect concentration or disturb sleep. People may tolerate infrequent, short duration vibration levels, but human annoyance to vibration becomes more pronounced if the vibration is continuous or occurs frequently. A vibration level that causes annoyance will be well below the damage threshold for normal buildings. Annoyance generally occurs in reaction to newly introduced sources of noise that interrupt ongoing activities. Community annoyance is a summary measure of the general adverse reaction of people to noise that causes speech interference, sleep disturbance, or interference with the desire for a tranquil environment. People react to the duration of noise events, judging longer events to be more annoying than shorter ones, and transportation noise is usually a primary cause of community dissatisfaction. Construction noise or vibration also often generates complaints, especially during lengthy periods of heavy construction, when nighttime construction is undertaken to avoid disrupting workday activity, or when the adjacent community has no clear understanding of the extent or duration of the construction.

The city does not have regulations that define acceptable levels of vibration. Therefore, this document references a Federal Transit Administration (FTA) publication concerning noise and vibration impact assessment from transit activities for informational purposes. Although the FTA guidelines are

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44 Ibid, pp. 2-13 to 2-17
46 Ibid.
intended to apply to transit operations, the guidelines may be reasonably applied to the assessment of the potential for annoyance or structural damage to other facilities and “fragile” buildings resulting from other activities. The FTA guidelines do not define what constitutes a “fragile” building other than to state that many fragile buildings are old.

**Noise Compatibility**

San Francisco addresses noise policies in the general plan’s environmental protection element.47 This element includes a transportation noise section that provides general guidance for reducing transportation noise through “sound land use planning and transportation planning.” It also states: “in a fully developed city, such as San Francisco, where land use and circulation patterns are by and large fixed, the ability to reduce the noise impact through a proper relationship of land use and transportation facility location is limited.”48

The general plan focuses on the effect of noise on the community due to ground transportation noise sources and establishes a land use compatibility chart for community noise for determining when noise reduction requirements should be analyzed, such as providing sound insulation for affected properties (see Table 3). The standards in the land use compatibility chart for community noise determine the maximum acceptable noise environment for each newly developed land use. Although Table 3 presents a range of noise levels that are considered compatible or incompatible with various land uses, the maximum “satisfactory” noise level is 60 dBA Ldn for residential and hotel uses; 65 dBA Ldn for schools, classrooms, libraries, churches and hospitals; 70 dBA Ldn for playgrounds, parks, offices, retail commercial uses, and noise-sensitive manufacturing/communication uses; and 77 dBA Ldn for other commercial uses such as wholesale, certain retail, industrial/manufacturing, transportation, communications, and utilities uses.49 The land use compatibility chart notes that at

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48 Ibid.

49 Day/Night Noise Level (Ldn) is the 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 10 decibels to sound levels occurring in the night between 10 p.m. and 7 a.m. (defined as sleeping hours).
residential uses, should noise levels exceed 65 dBA $L_{dn}$, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features must be included in the design.

Table 3: Land Use Compatibility Chart for Community Noise, dBA

<table>
<thead>
<tr>
<th>LAND USE CATEGORY</th>
<th>Sound Levels and Land Use Consequences (see explanation below)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>$L_{dn}$ Value in Decibels</td>
</tr>
<tr>
<td>Residential - All Dwellings, Group Quarters</td>
<td></td>
</tr>
<tr>
<td>Transient Lodging - Motels, Hotels</td>
<td></td>
</tr>
<tr>
<td>School Classrooms, Libraries, Churches, Hospitals, Nursing Homes, etc.</td>
<td></td>
</tr>
<tr>
<td>Auditoriums, Concert Halls, Amphitheaters, Music Shells</td>
<td></td>
</tr>
<tr>
<td>Sports Arenas, Outdoor Spectator Sports</td>
<td></td>
</tr>
<tr>
<td>Playgrounds, Parks</td>
<td></td>
</tr>
<tr>
<td>Golf Courses, Riding Stables, Water-based Recreation Areas, Cemeteries</td>
<td></td>
</tr>
<tr>
<td>Office Buildings - Personal, Business and Professional Services</td>
<td></td>
</tr>
<tr>
<td>Commercial - Retail, Movie Theatres, Restaurants</td>
<td></td>
</tr>
<tr>
<td>Commercial - Wholesale and some Retail, Industrial/Manufacturing, Transportation, Communications and Utilities</td>
<td></td>
</tr>
<tr>
<td>Noise Sensitive Manufacturing and Communications</td>
<td></td>
</tr>
</tbody>
</table>

Specified land use is satisfactory, based upon the assumption that any buildings involved are of conventional construction, without any special noise insulation requirements.

New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is performed and needed noise insulation features included in the design.

New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be performed and needed noise insulation features included in the design.

New construction or development clearly generally should not be undertaken.

Source: City and County of San Francisco, City of San Francisco General Plan, December 2, 2004.
Overall, the general plan recognizes that transportation noise remains a problem and provides guidance to manage incompatible transportation noise levels through various transportation noise-related policies. The city’s background noise levels map shows the project site may be exposed to traffic noise levels above 70 dBA Ldn. According to the city’s general plan, new development should incorporate noise insulation features if the noise levels exceed the sound level guidelines shown in the land use compatibility chart.

**Noise Regulations**

**California Code of Regulations**

The State of California has established regulations that help prevent adverse impacts to occupants of buildings located near noise sources. The state noise insulation standard requires buildings to meet performance standards through design and/or installation of building materials that would offset, as necessary, any noise source in the vicinity of the receptor. State regulations include requirements for the construction of new hotels, motels, apartment houses, and dwellings other than detached single-family dwellings that are intended to limit the extent of noise transmitted into habitable spaces. These requirements are found in the California Code of Regulations, Title 24 (known as the Building Standards Administrative Code), Part 2 (known as the California Building Code), Appendix Chapters 12 and 12A. For limiting noise transmitted between adjacent dwelling units, the noise insulation standards specify the extent to which walls, doors, and floor ceiling assemblies must block or absorb sound. For limiting noise from exterior noise sources, the noise insulation standards set an interior standard of 45 dBA Ldn in any habitable room with all doors and windows closed. In addition, the standards require preparation of an acoustical analysis demonstrating the manner in which dwelling units have been designed to meet this interior standard, where such units are proposed in an area with exterior noise levels greater than 60 dBA Ldn.

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San Francisco Noise Ordinance

The San Francisco Noise Ordinance (noise ordinance) regulates both construction noise and stationary-source noise within the city, including noise from transportation, construction, mechanical equipment, entertainment, and human or animal behavior. Found in Article 29, “Regulation of Noise,” of the San Francisco Police Code, the noise ordinance addresses noise from construction equipment, nighttime construction work, and noise from stationary mechanical equipment and waste processing activities. The following regulations are applicable to the proposed project.

Section 2907, Construction Equipment, and Section 2908, Construction Work at Night

Section 2907(a) requires that construction work be conducted in the following manner: (1) noise levels of construction equipment, other than impact tools, must not exceed 80 dBA at a distance of 100 feet from the source (the equipment generating the noise); (2) impact tools must have intake and exhaust mufflers that are approved by the Director of San Francisco Public Works or the Director of the DBI to best accomplish maximum noise reduction; and (3) if the noise from the construction work would exceed the ambient noise levels at the site property line by 5 dBA, the work must not be conducted between 8 p.m. and 7 a.m. unless the Director of Public Works authorizes a special permit for conducting the work during that period.

Section 2909, Noise Limits

This section of the noise ordinance regulates noise from mechanical equipment and other similar sources. (As stated in the ordinance, “No person shall produce or allow to be produced by any machine, or device, music or entertainment, or any combination of same ...”) This includes all equipment, such as electrical equipment (transformers, emergency generators) and mechanical equipment that is installed on commercial/industrial and residential properties. Mechanical equipment operating on commercial or industrial property must not produce a noise level more than

8 dBA above the ambient noise level at the property plane. Equipment operating on residential property must not produce a noise level more than 5 dBA above the ambient noise level at the property boundary. Section 2909(d) states that no fixed (permanent) noise source (as defined by the noise ordinance) may cause the noise level inside any sleeping or living room in a dwelling unit on residential property to exceed 45 dBA between 10 p.m. and 7 a.m. or 55 dBA between 7 a.m. and 10 p.m. when windows are open, except where building ventilation is achieved through mechanical systems that allow windows to remain closed.

**Existing Noise Environment**

To assess existing noise levels, LSA conducted one long-term 24-hour noise measurement on the project site from 12 p.m. on May 16, 2017, to 12 p.m. on May 17, 2017, and two short-term noise measurements on the project site on May 16, 2017. The first short-term measurement was taken at 12 p.m. The second short-term measurement was taken at 12:15 p.m. The significant sources of noise at the project site are traffic operations on Turk Street and Larkin Street, pedestrian activity, and emergency sirens in the area. The results of the short-term noise measurements were then normalized to data gathered at the long-term measurement to estimate a daily noise level. Noise measurement data collected during monitoring is summarized in Table 4. The results of the existing noise monitoring shows that noise levels range from 70.1 to 71.4 dBA Ldn at the project site. The meteorological conditions at the time of the noise monitoring are shown in Table 5.

**Table 4: Ambient Noise Monitoring Results, dBA**

<table>
<thead>
<tr>
<th>Location Number</th>
<th>Location Description</th>
<th>Daytime Noise Levels (Ldn)(^a)(^b)</th>
<th>Nighttime Noise Levels (Ldn)(^a)(^c)</th>
<th>Day-Night Noise Level (Ldn)(^a)</th>
</tr>
</thead>
<tbody>
<tr>
<td>LT-01</td>
<td>Located at 2nd floor elevation on the northeast portion of the project site approximately 20 feet from Larkin Street</td>
<td>66.5 – 70.0</td>
<td>58.9 – 67.0</td>
<td>71.4</td>
</tr>
<tr>
<td>ST-01</td>
<td>Located at 1st floor elevation on the southwest portion of the project site approximately 20 feet from Turk Street</td>
<td>65.2 – 68.7</td>
<td>57.6 – 65.6</td>
<td>70.1</td>
</tr>
<tr>
<td>ST-02</td>
<td>Located at 1st floor elevation on the southeast corner of the project site approximately 30 feet from the Turk Street and Larkin Street intersection</td>
<td>66.3 – 69.8</td>
<td>58.7 – 66.7</td>
<td>71.2</td>
</tr>
</tbody>
</table>

\(^a\) L\(_{eq}\) represents the average of the sound energy occurring over a 1-hour period and L\(_{dn}\) represents the day-night sound level for a 24-hour period.

\(^b\) Daytime hours occur from 7 a.m. to 10 p.m.

\(^c\) Nighttime hours occur from 10 p.m. to 7 a.m.

dBA = decibel (A-weighted)

Table 5: Meteorological Conditions During Ambient Noise Monitoring

<table>
<thead>
<tr>
<th>Date</th>
<th>Maximum Wind Speed (mph)</th>
<th>Average Wind Speed (mph)</th>
<th>Temperature ('F)</th>
<th>Relative Humidity (percent)</th>
<th>Sky Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>May 16, 2017</td>
<td>20</td>
<td>12</td>
<td>60</td>
<td>74</td>
<td>Overcast</td>
</tr>
<tr>
<td>May 17, 2017</td>
<td>20</td>
<td>10</td>
<td>62</td>
<td>66</td>
<td>Clear</td>
</tr>
</tbody>
</table>

Source: LSA Associates, Inc., 2017

Existing Sensitive Receptors

Certain land uses are considered more sensitive to noise than others. Examples of these include residential areas, educational facilities, hospitals, childcare facilities, senior housing, and hotel uses. The project site is located at the northwest corner of the Turk Street and Larkin Street intersection. Existing uses within the immediate vicinity of the site range from mid- to high-rise commercial, office, institutional, residential, and hotel uses. The nearest sensitive receptors to the project site include the hotel component of the Phoenix Hotel located immediately adjacent to the project site and the residential buildings located across Larkin Street and at the southeast corner of Turk and Larkin streets.

Impact NO-1: The proposed project would not result in exposure of persons to or generation of noise levels in excess of standards established in San Francisco's noise ordinance, nor would the proposed project result in a substantial permanent increase in ambient noise levels above levels existing without the project. (less-than-significant impact)

Development of the proposed project would result in new daily trips on local roadways in the project site vicinity. As discussed above in Section H.4, Transportation and Circulation, pp. 58–59, the project would generate an estimated 162 daily vehicle trips, with 23 trips occurring during the PM peak hours. Project-related traffic would not be expected to result in a perceptible increase in traffic noise levels along roadways in the site vicinity. A characteristic of sound is that a doubling of a noise source is required in order to result in a perceptible (3 dBA or greater) increase in the resulting noise level. Project daily trips would not result in a doubling of traffic volumes along any roadway segment in the project vicinity, and therefore would not result in a perceptible increase in traffic noise levels at receptors in the project vicinity. Therefore, project-related traffic would result in a less-than-significant impact on off-site sensitive land uses.
In addition to generating minimal traffic-related noise, the proposed project is also anticipated to result in less-than-significant noise levels associated with operation. The proposed project would include residential units and commercial uses, which are not typically associated with high levels of operational noise. Potential long-term stationary noise impacts at the project site would be primarily associated with outdoor activities and operations associated with delivery truck activities associated with the loading and unloading areas. Of these stationary noise sources, noise generated by delivery truck activity would generate the highest maximum noise levels. Representative vehicle-related loading zone activities, such as people conversing or doors slamming, would generate approximately 60 dBA to 70 dBA $L_{max}$ at 50 feet. Delivery truck loading and unloading activities can result in maximum noise levels from 75 dBA to 85 dBA $L_{max}$ at 50 feet. Noise levels from these activities would be similar to what is currently experienced at nearby land uses in the project site vicinity. Therefore, project-related noise from delivery activities would not result in a substantial increase in ambient noise levels compared with noise levels existing without the project.

As previously noted, the proposed project would not include an emergency generator during project operation. In addition, the proposed project would be required to comply with the San Francisco noise ordinance restricting equipment operating on residential property from generating noise greater than 5 dBA above the ambient noise level at the property boundary. Therefore, project-related operational noise impacts would be less than significant, and no mitigation would be required. This topic will not be addressed in the EIR.

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

Construction of the proposed project would involve demolition, site preparation, and construction activities but would not involve the use of construction equipment that would result in substantial groundborne vibration or groundborne noise on properties adjacent to the project site. No pile driving, blasting, or substantial levels of excavation or grading activities are proposed. Furthermore, project operation associated with residential and commercial uses would not generate substantial groundborne noise and vibration. Therefore, the project would not result in the exposure of persons
to or generation of excessive groundborne noise and vibration. This impact would be less than significant and no mitigation measure is required. This topic will not be addressed in the EIR.

**Impact NO-3: Project demolition and construction would result in a temporary and periodic increase in ambient noise levels in the project vicinity above existing conditions. (less-than-significant with mitigation incorporated)**

Short-term noise impacts would occur during demolition, grading and site preparation activities. Table 6 lists maximum noise levels recommended for noise impact assessments for typical construction equipment, based on a distance of 50 feet between the equipment and a noise receptor. Construction-related short-term noise levels would be higher than existing ambient noise levels currently in the project area but would cease once construction of the project is completed.

Two types of short-term noise impacts could occur during construction of the proposed project. The first type involves construction crew commutes and the transport of construction equipment and materials to the site for the proposed project, which would incrementally increase noise levels on roads leading to the site. As shown in Table 6, there would be a relatively high single-event noise exposure potential at a maximum level of 87 dBA $L_{max}$ with trucks passing at 50 feet.

The second type of short-term noise impact is related to noise generated during excavation, grading, and construction on the project site. Construction is performed in discrete steps, or phases, each with its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site. Therefore, the noise levels vary as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase.

Table 6 lists maximum noise levels recommended for noise impact assessments for typical construction equipment, based on a distance of 50 feet between the equipment and a noise receptor. Typical maximum noise levels range up to 96 dBA $L_{max}$ at 50 feet during the noisiest construction phases. The site preparation phase, including excavation and grading of the site, tends to generate the highest noise levels because earthmoving machinery is the noisiest construction equipment.
Earthmoving equipment includes excavating machinery such as backfillers, bulldozers, draglines, and front loaders. Earthmoving and compacting equipment includes compactors, scrapers, and graders. Typical operating cycles for these types of construction equipment may involve one or two minutes of full-power operation followed by three or four minutes at lower power settings. Project construction is expected to require the use of excavation and earthmoving machinery, as well as jackhammers. No pile driving is proposed; however, the project could include drilled displacement columns and geopiers, which could result in noise levels ranging up to 75 to 80 dBA at 20 feet, and rapid impact compaction could be utilized to densify the soil prior to foundation installation, which could result in noise levels up to 100 decibels at 20 feet.

### Table 6: Typical Construction Equipment Maximum Noise Levels, $L_{\text{max}}$

<table>
<thead>
<tr>
<th>Type of Equipment</th>
<th>Range of Maximum Sound Levels (dBA at 50 feet)</th>
<th>Suggested Maximum Sound Levels for Analysis (dBA at 50 feet)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pile drivers</td>
<td>81 to 96</td>
<td>93</td>
</tr>
<tr>
<td>Rock drills</td>
<td>83 to 99</td>
<td>96</td>
</tr>
<tr>
<td>Jackhammers</td>
<td>75 to 85</td>
<td>82</td>
</tr>
<tr>
<td>Pneumatic tools</td>
<td>78 to 88</td>
<td>85</td>
</tr>
<tr>
<td>Pumps</td>
<td>74 to 84</td>
<td>80</td>
</tr>
<tr>
<td>Scrapers</td>
<td>83 to 91</td>
<td>87</td>
</tr>
<tr>
<td>Haul trucks</td>
<td>83 to 94</td>
<td>88</td>
</tr>
<tr>
<td>Cranes</td>
<td>79 to 86</td>
<td>82</td>
</tr>
<tr>
<td>Portable generators</td>
<td>71 to 87</td>
<td>80</td>
</tr>
<tr>
<td>Rollers</td>
<td>75 to 82</td>
<td>80</td>
</tr>
<tr>
<td>Dozers</td>
<td>77 to 90</td>
<td>85</td>
</tr>
<tr>
<td>Tractors</td>
<td>77 to 82</td>
<td>80</td>
</tr>
<tr>
<td>Front-end loaders</td>
<td>77 to 90</td>
<td>86</td>
</tr>
<tr>
<td>Hydraulic backhoe</td>
<td>81 to 90</td>
<td>86</td>
</tr>
<tr>
<td>Hydraulic excavators</td>
<td>81 to 90</td>
<td>86</td>
</tr>
<tr>
<td>Graders</td>
<td>79 to 89</td>
<td>86</td>
</tr>
<tr>
<td>Air compressors</td>
<td>76 to 89</td>
<td>86</td>
</tr>
<tr>
<td>Trucks</td>
<td>81 to 87</td>
<td>86</td>
</tr>
</tbody>
</table>


The nearest sensitive receptor, the hotel component of the Phoenix Hotel, is located immediately adjacent to the project site at 601 Eddy Street. This hotel use may be subject to short-term construction noise exceeding 100 dBA $L_{\text{max}}$ when construction is occurring at the project site. This noise level could result in an exceedance of the city’s allowable construction noise levels from construction equipment,
as specified under the noise ordinance as 80 dBA $L_{\text{max}}$ at 100 feet (equivalent to 86 dBA $L_{\text{max}}$ at 50 feet), which would be a significant noise impact.

Implementation of **Mitigation Measure M-N0-3, Construction Noise Reduction**, as described below, during project construction would ensure all construction equipment noise subject to the noise ordinance be maintained at or below the 80 dBA $L_{\text{max}}$ at 100 feet limit, thereby reducing potential construction-period noise impacts for the indicated sensitive receptors to less-than-significant levels.

**Mitigation Measure M-N0-3: Construction Noise Reduction.** The project sponsor shall designate a point of contact to respond to any noise complaints and the following practices shall be incorporated into the construction contract agreement documents to be implemented by the project contractor (Contractor) during construction of the project:

- Conduct noise monitoring at the beginning of major construction phases (e.g., demolition, excavation) to determine the need and the effectiveness of noise-attenuation measures. If needed, measures shall include plywood barriers, suspended construction blankets, or other screening devices to break line of sight to noise-sensitive receptors.

- Post signs on site pertaining to permitted construction days and hours, complaint procedures, and who to notify in the event of a problem, with telephone numbers listed.

- Notify the Department of Building Inspection (DBI) and neighbors in advance of the schedule for each major phase of construction and expected loud activities.

- When feasible, select "quiet" construction methods and equipment (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds).

- Require that all construction equipment be in good working order and mufflers be inspected to confirm that they are functioning properly. Avoid unnecessary idling of equipment and engines.
• Locate stationary equipment, material stockpiles, and vehicle staging areas as far as practicable from all identified sensitive receptors. To the extent feasible, avoid placing stationary noise generating equipment (e.g., generators, compressors) within noise-sensitive buffer areas (measured at 20 feet) from immediately-adjacent neighbors.

• Wherever possible, use impact tools (e.g., jack hammers, pavement breakers, and rock drills) that are hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used, along with external noise jackets on the tools, where feasible.

• In compliance with San Francisco Noise Ordinance (Police Code Article 29), limit “noisy” construction activity to the hours of 7 a.m. to 8 p.m. Noisy construction outside of these hours shall be approved through a development permit based on a site-specific construction noise mitigation plan and a finding by DBI that the construction noise mitigation plan is adequate to prevent noise disturbance of potentially affected residential uses.

Standard mitigation measures to reduce construction-related noise levels have been demonstrated to reduce equipment noise by 5 to 10 dBA.\textsuperscript{52} Temporary plywood noise barriers can provide 5 dBA of sound attenuation. Moveable sound barrier curtains can provide 15 dBA of sound attenuation.\textsuperscript{53} Static sound barrier curtains can provide sound transmission reduction of 16 to 43 dBA, depending on the frequency of the noise source.\textsuperscript{54} With implementation of the measures as outlined in Mitigation Measure M-NO-3, Construction Noise Reduction, noise reductions to within specified limits are attainable and construction noise impacts for the indicated sensitive receptors would be reduced to less-than-significant levels.


\textsuperscript{53} Industrial Noise Control, \textit{Product Specification Sheet, INC Portable Noise Screen}.

\textsuperscript{54} Environmental Noise Control, \textit{Product Specification Sheet, ENC STC-32 Sound Control Panel System}. 
Impact NO-4: The proposed project would not be substantially affected by existing noise levels. (*less-than-significant impact*)

The proposed project would include new sensitive receptors in the form of residences. While the effects of the existing noise environment on the proposed receptors are currently outside the scope of CEQA, noise sources, such as ventilation and air-conditioning systems, generated by the proposed project could impact those future residences once they are occupied. This impact is only to be analyzed if the proposed project would exacerbate the existing noise environment. Impacts NO-1 and NO-2 concluded that the proposed project would not result in a significant noise impact. Impact NO-3 identified a potentially significant impact associated with construction noise that would be reduced to a less-than-significant level with implementation of Mitigation Measure M-NO-3, Construction Noise Reduction. Therefore, this impact need not be analyzed and will not be discussed in the EIR. However, the following is provided for informational purposes.

The proposed project would be subject to the Noise Regulations Relating to Residential Uses Near Places of Entertainment (Ordinance 70-15, effective June 19, 2015). The intent of these regulations is to address potential noise conflicts between residential uses in noise critical areas, such as in proximity to highways and other high-volume roadways, railroads, rapid transit lines, airports, nighttime entertainment venues or industrial areas. In accordance with the adopted regulations, residential structures to be located where the day-night average sound level (Ldn) or community noise equivalent level (CNEL) exceeds 60 dBA shall require an acoustical analysis with the application of a building permit showing that the proposed design would limit exterior noise to 45 dBA in any habitable room. Furthermore, the regulations require the planning department and planning commission to consider the compatibility of uses when approving residential uses adjacent to or near existing permitted places of entertainment and take all reasonably available means through the city’s design review and approval processes to ensure that the design of new residential development projects take into

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55 In a decision issued on December 17, 2015, the California Supreme Court held that CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project’s future users or residents except where a project or its residents may exacerbate existing environmental hazards (California Building Industry Association v. Bay Area Air Quality Management District, December 17, 2015, Case No. S213478; http://www.courts.ca.gov/opinions/documents/S213478.PDF), accessed August 7, 2017.
account the needs and interests of both the places of entertainment and the future residents of the new development.

As identified above, the predominant source of noise in the project vicinity is traffic on Turk Street and Larkin Street and general urban activities. In addition, Chambers Eat + Drink in the nearby Phoenix Hotel, a place of entertainment as defined in Ordinance 70-15, is another source of noise in the project vicinity. Noise levels in the project vicinity range from 70 to 72 dBA Ldn. The city’s land use compatibility chart shows that “satisfactory” sound levels for residential land uses are 60 dBA Ldn for outdoor environments. According to the city’s general plan, new development should incorporate noise insulation features if the noise levels exceed the sound level guidelines shown in the land use compatibility chart. The proposed project would be required to comply with the California noise insulation standards in Title 24, which establishes 45 dBA Ldn as an acceptable interior noise level. With compliance to the Title 24 standards, the proposed project would feasibly attain acceptable noise levels.

To comply with air quality standards, the proposed project is required to have central air which allows for a windows closed condition. Based on the results of the existing noise monitoring results, noise levels at first floor and second floor elevations would be similar. To provide a conservative analysis, the noise level at the upper floors are assumed to be the same as ground level noise conditions though noise levels may decrease slightly. To meet the 45 dBA Ldn standard, the windows at the project site would need to provide 27 dBA reduction.

Typically, calculations assuming a wall rating of STC-46 and window rating of STC-28 would reduce noise levels by 29 dBA. With windows closed, interior noise levels at the proposed project would be approximately 43.0 dBA (i.e., 72 dBA - 29 dBA = 43 dBA), which is below the 45 dBA Ldn interior noise standard with windows closed for noise-sensitive land uses. Therefore, with standard building construction, central air conditioning allowing windows to remain closed, and windows with a minimum sound transmission class (STC) rating of 28 or higher, noise impacts associated with traffic would be less than significant. In compliance with Title 24, DBI would review the final building plans to ensure that the building wall, floor/ceiling and window assemblies meet Title 24 acoustical requirements.
Impact C-NO-1: The proposed project in combination with past, present, and reasonably foreseeable future projects would not create a significant cumulative noise or vibration impact. *(less-than-significant impact)*

**Construction**

Construction of the proposed project, such as excavation, grading, or demolition and construction of other buildings in the area, would occur on a temporary and intermittent basis. There are no reasonably foreseeable cumulative development projects within 300 feet of the site that would have the potential to result in cumulative construction noise or vibration impacts during simultaneous construction activities. In general, compliance with noise ordinance requirements and implementation of Mitigation Measure M-NO-3, *Construction Noise Reduction*, would reduce the noise impact from project construction to a less-than-significant level. Project construction-related noise would not substantially increase ambient noise levels at locations greater than a few hundred feet from the project site. The project would not have a cumulatively considerable contribution to the existing noise environment. As such, the proposed project—in combination with past, present, and reasonably foreseeable future projects—would not create a significant cumulative noise or vibration impact.

**Operations**

As identified above, potential long-term stationary noise impacts at the project site would be primarily associated with outdoor activities and operations associated with delivery truck activities. However, noise levels from these activities would be similar to what is currently experienced at adjacent land uses in the project site vicinity. In addition, implementation of the proposed project would result in new daily trips on local roadways in the project site vicinity. However, the project-related contribution of net new vehicle trips would represent a small fraction of existing traffic volumes, and therefore would not result in an audible change in traffic noise. In addition, the new residents that would result from implementation of the cumulative development in the project vicinity would generate a similarly low amount of new PM peak hour trips. As such, the proposed project and future projects would not result in traffic noise levels that would substantially increase ambient noise levels in the project site vicinity. Furthermore, the proposed project and future projects in the vicinity primarily consist of residential and commercial uses, which are uses that do not
typically generate substantial sources of operational noise, and residential projects would be subject to comply with the noise ordinance requirements for residential noise limits.

Given this, the proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in considerable contribution to a permanent increase in noise or vibration in the project area. This impact would be less than significant and no mitigation measure is required. This topic will not be addressed in the EIR.

<table>
<thead>
<tr>
<th>Topics:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>6. AIR QUALITY—Would the project:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a) Conflict with or obstruct implementation of the applicable air quality plan?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>d) Expose sensitive receptors to substantial pollutant concentrations?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>e) Create objectionable odors affecting a substantial number of people?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

Overview

The BAAQMD is the regional agency with jurisdiction over the nine-county San Francisco Bay Area Air Basin, 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 San Francisco Bay Area Air Basin 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 San Francisco Bay Area Air Basin 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 2017 Clean Air Plan, was adopted on April 19, 2017. The 2017 Clean Air Plan/Regional Climate Protection Strategy serves as a roadmap for the BAAQMD to reduce air pollution and protect public health and the global climate. The 2017 Clean Air Plan also includes measures and programs to reduce emissions of fine particulates and toxic air contaminants. In addition, the regional climate protection strategy is included in the 2017 Clean Air Plan, which identifies potential rules, control measures, and strategies that the BAAQMD can pursue to reduce greenhouse gases throughout the Bay Area.

Criteria Air Pollutants

In accordance with the state and federal CAAs, air pollutant standards are identified for the following six criteria air pollutants: ozone, carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead. These air pollutants are termed criteria air pollutants because they are regulated by developing specific public health- and welfare-based criteria as the basis for setting permissible levels. In general, the San Francisco Bay Area Air Basin experiences low concentrations of most pollutants when compared to federal or state standards. The San Francisco Bay Area Air Basin is designated as either in attainment 39 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

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39 “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.
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.57

Land use projects may contribute to regional criteria air pollutants during the construction and operational phases of a project. Table 7 identifies air quality significance thresholds followed by a discussion of each threshold. Projects that would result in criteria air pollutant emissions below these significance thresholds would not violate an air quality standard, contribute substantially to an air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants within the San Francisco Bay Area Air Basin.

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

Source: Bay Area Air Quality Management District, 2017.

Ozone Precursors

As discussed previously, the San Francisco Bay Area Air Basin is currently designated as non-attainment for ozone and particulate matter. Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG) and oxides of nitrogen (NOx). The potential for a project to result in a cumulatively considerable net increase in criteria air pollutants, which may contribute to an existing or projected

air quality violation, are based on the state and federal Clean Air Acts emissions limits for stationary sources. To ensure that new stationary sources do not cause or contribute to a violation of an air quality standard, BAAQMD Regulation 2, Rule 2 requires that any new source that emits criteria air pollutants above a specified emissions limit must offset those emissions. For ozone precursors ROG and NOx, the offset emissions level is an annual average of 10 tons per year (or 54 pounds (lbs.) per day). These levels represent emissions below which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants.

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

**Particulate Matter (PM₁₀ and PM₂.₅)⁵⁹**

The BAAQMD has not established an offset limit for PM₂.₅. However, the emissions limit in the federal New Source Review (NSR) for stationary sources in nonattainment areas is an appropriate significance threshold. For PM₁₀ and PM₂.₅, the emissions limit under NSR is 15 tons per year (82 lbs. per day) and 10 tons per year (54 lbs. per day), respectively. These emissions limits represent levels below which a source is not expected to have an impact on air quality.⁶⁰ Similar to ozone precursor

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⁵⁸ Bay Area Air Quality Management District, Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance, October 2009, page 17.

⁵⁹ PM₁₀ is often termed “coarse” particulate matter and is made of particulates that are 10 microns in diameter or smaller. PM₂.₅, termed “fine” particulate matter, is composed of particles that are 2.5 microns or less in diameter.

thresholds identified above, land use development projects typically result in particulate matter emissions as a result of increases in vehicle trips, space heating and natural gas combustion, landscape maintenance, and construction activities. Therefore, the above thresholds can be applied to the construction and operational phases of a land use project. Again, because construction activities are temporary in nature, only the average daily thresholds are applicable to construction-phase emissions.

**Fugitive Dust**

Fugitive dust emissions are typically generated during construction phases. Studies have shown that the application of best management practices (BMPs) at construction sites significantly control fugitive dust\(^61\) and individual measures have been shown to reduce fugitive dust by anywhere from 30 to 90 percent.\(^62\) The BAAQMD has identified a number of BMPs to control fugitive dust emissions from construction activities.\(^63\) The city’s Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) requires a number of measures to control fugitive dust and the BMPs employed in compliance with the city’s Construction Dust Control Ordinance is an effective strategy for controlling construction-related fugitive dust.

**Other Criteria Pollutants**

Regional concentrations of CO in the bay area have not exceeded the state standards in the past 11 years and SO\(_2\) concentrations have never exceeded the standards. The primary source of CO emissions from development projects is vehicle traffic. Construction-related SO\(_2\) emissions represent a negligible portion of the total basin-wide emissions and construction-related CO emissions represent less than five percent of the bay area total basin-wide CO emissions. As discussed previously, the bay area is in attainment for both CO and SO\(_2\). Furthermore, the BAAQMD has

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\(^63\) Bay Area Air Quality Management District, 2017, op. cit.
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.⁶⁴

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,

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⁶⁴ 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.
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 30 years. Therefore, assessments of air pollutant exposure to residents typically result in the greatest adverse health outcomes of all population groups.

Exposures to fine particulate matter (PM$_{2.5}$) are strongly associated with mortality, respiratory diseases, and lung development in children, and other endpoints such as hospitalization for cardiopulmonary disease.$^{65}$ 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.$^{66}$ The estimated cancer risk from exposure to diesel exhaust is much higher than the risk associated with any other TAC routinely measured in the region.

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


Excess Cancer Risk

The Air Pollutant Exposure Zone includes all areas where excess cancer risk from known sources exceeds 100 per one million persons. This criterion is based on United States Environmental Protection Agency (U.S. EPA) guidance for conducting air toxic analyses and making risk management decisions at the facility and community-scale level.67 As described by the BAAQMD, the U.S. EPA 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 rulemaking,68 the U.S. EPA states that “…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.69

Fine Particulate Matter

In April 2011, the U.S. EPA published a policy assessment for the particulate matter review of the National Ambient Air Quality Standards, “Particulate Matter Policy Assessment.” In this document, U.S. EPA staff concludes that the then current federal annual PM$_{2.5}$ standard of 15 μg/m$^3$ should be revised to a level within the range of 13 to 11 μg/m$^3$, with evidence strongly supporting a standard within the range of 12 to 11 μg/m$^3$. The Air Pollutant Exposure Zone for San Francisco is based on the health protective PM$_{2.5}$ standard of 11 μg/m$^3$, as supported by the U.S. EPA Particulate Matter Policy

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68 54 Federal Register 38044, September 14, 1989.

Assessment, although lowered to 10 μg/m³ to account for uncertainty in accurately predicting air pollutant concentrations using emissions modeling programs.

**Proximity to Freeways**

According to 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 within a 500-foot buffer of any freeway are at an increased health risk from air pollution, 53 lots that are within 500 feet of freeways are included in the Air Pollutant Exposure Zone.

**Health Vulnerable Locations**

San Francisco adopted Article 38 of the San Francisco Health Code in 2008, requiring an air quality assessment for new residential projects of 10 or more units located in proximity to high-traffic roadways, as mapped by the San Francisco Department of Public Health (SFDPH), to determine whether residents would be exposed to unhealthful levels of PM$_{2.5}$. The air quality assessment evaluates the concentration of PM$_{2.5}$ from local roadway traffic that may impact a proposed residential development site. If the SFDPH air quality assessment indicates that the annual average concentration of PM$_{2.5}$ at the site would be greater than 0.2 micrograms per cubic meter (μg/m³), Health Code section 3807 requires development on the site to be designed or relocated to avoid exposure greater than 0.2 μg/m³, or a ventilation system to be installed that would be capable of removing 80 percent of ambient PM$_{2.5}$ from habitable areas of the residential units. The proposed project consists of 108 residential units and, according to the city’s air pollutant exposure zone map, the proposed project is located within an air pollutant exposure zone and would therefore be required to install an advanced ventilation system.\(^{70}\)

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Construction Air Quality Impacts

During construction, short-term degradation of air quality may occur due to the release of particulate emissions generated by excavation, grading, hauling, and other activities. Emissions from construction equipment are also anticipated and would include CO, NOx, ROG, PM2.5 and PM10, and TACs, such as diesel exhaust particulate matter.

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

Construction activities (short-term) typically result in emissions of ozone precursors and PM in the form of dust (fugitive dust) and exhaust (e.g., vehicle tailpipe emissions). Emissions of ozone precursors and PM are primarily a result of the combustion of fuel from on-road and off-road vehicles. However, ROG are also emitted from activities that involve painting, other types of architectural coatings, or asphalt paving.

Fugitive Dust

Project-related demolition, excavation, grading, and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. Although there are federal standards for air pollutants and implementation of state and regional air quality control plans, air pollutants continue to have impacts on human health throughout the country. California has found that particulate matter exposure can cause health effects at lower levels than national standards. The current health burden of particulate matter demands that, where possible, public agencies take feasible available actions to reduce sources of particulate matter exposure. According to the ARB, reducing particulate matter PM2.5 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.71

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71 Air Resources Board, Methodology for Estimating Premature Deaths Associated with Long-term Exposure to Fine Airborne Particulate Matter in California, Staff Report, Table 4c, October 24, 2008.
Dust can be an irritant causing watering eyes or irritation to the lungs, nose, and throat. Demolition, excavation, grading, and other construction activities can cause wind-blown dust that adds particulate matter to the local atmosphere. Depending on exposure, adverse health effects can occur due to this particulate matter, in general, and also due to specific contaminants such as lead or asbestos that may be constituents of soil.

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

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

In compliance with the Construction Dust Control Ordinance, the project sponsor and the contractor responsible for construction activities at the project site would be required to use the following practices to control construction dust on the site or other practices that result in equivalent dust control that are acceptable to the Director. Dust suppression activities may include watering all active construction areas sufficiently to prevent dust from becoming airborne; increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. During excavation and dirt-moving activities, contractors shall wet sweep or vacuum the streets, sidewalks, paths, and intersections where work is in progress at the end of the workday. Inactive stockpiles (where no disturbance occurs for more than seven days) greater than 10 cubic yards or 500 square feet of excavated material, backfill material, import material, gravel, sand, road base, and soil shall be covered with a 10 mil (0.01 inch) polyethylene plastic (or equivalent) tarp, braced down, or use other equivalent soil stabilization techniques. 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.

The site-specific Dust Control Plan required by the Dust Control Ordinance would require the project sponsor to submit of a map to the Director of Public Health showing all sensitive receptors within 1,000 feet of the site; wet down areas of soil at least three times per day; provide an analysis of wind direction and install upwind and downwind particulate dust monitors; record particulate monitoring results; hire an independent, third-party to conduct inspections and keep a record of those inspections; establish shut-down conditions based on wind, soil migration, etc.; establish a hotline for surrounding community members who may be potentially affected by project-related dust; limit the area subject to construction activities at any one time; install dust curtains and windbreaks on the property lines, as necessary; limit the amount of soil in hauling trucks to the size of the truck bed and securing with a tarpaulin; enforce a 15 mph speed limit for vehicles entering and exiting construction areas; sweep affected streets with water sweepers at the end of the day; install and utilize wheel washers to clean truck tires; terminate construction activities when winds exceed 25 miles per hour; apply soil stabilizers to inactive areas; and sweep off adjacent streets to reduce particulate emissions. The project sponsor would be required to designate an individual to monitor compliance with these dust control requirements. Compliance with the regulations and procedures set forth by the San Francisco Dust Control Ordinance would ensure that potential dust-related air quality impacts would be reduced to a less-than-significant level. This topic will not be discussed in the EIR.

Criteria Air Pollutants

As discussed above, construction activities would result in emissions of criteria air pollutants from the use of off- and on-road vehicles and equipment. To assist lead agencies in determining whether short-term construction-related air pollutant emissions require further analysis as to whether the project may exceed the criteria air pollutant significance thresholds shown in Table 7, p. 86, the
BAAQMD, in its CEQA Air Quality Guidelines (May 2011), developed screening criteria. If a proposed project meets the screening criteria, then construction of the project would result in less-than-significant criteria air pollutant impacts. A project that exceeds the screening criteria may require a detailed air quality assessment to determine whether criteria air pollutant emissions would exceed significance thresholds.

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

The proposed project includes approximately 82,000 square feet of residential use (not including common areas) and approximately 2,600 square feet of commercial use. As shown in Table 8, the size of proposed construction activities would be below the criteria air pollutant screening sizes for the land use types associated with the project and 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. This topic will not be discussed in the EIR.

**Table 8: Comparison of Proposed Project to BAAQMD Criteria Air Pollutants and Precursors Construction and Operational Screening Level Criteria**

<table>
<thead>
<tr>
<th>Land Use Type</th>
<th>Operational Criteria Pollutant Screening Size</th>
<th>Construction Criteria Pollutant Screening Size</th>
<th>Project Components</th>
</tr>
</thead>
<tbody>
<tr>
<td>Apartment, mid-rise</td>
<td>494 dwelling units</td>
<td>240 dwelling units</td>
<td>108 dwelling units</td>
</tr>
<tr>
<td>Strip Mall</td>
<td>99,000 sf</td>
<td>19,000 sf</td>
<td>2,600 sf</td>
</tr>
</tbody>
</table>


**Impact AQ-2:** The proposed project’s construction activities would generate toxic air contaminants, including diesel particulate matter, which would expose sensitive receptors to substantial pollutant concentrations. (*less-than-significant with mitigation incorporated*)
The project site is located within the Air Pollutant Exposure Zone as described above. The nearest sensitive receptors to the project site include the hotel component of the Phoenix Hotel located immediately adjacent to the project site and the residential buildings located across Larkin Street and at the southeast corner of Turk and Larkin streets.

With regard 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.\(^1\) 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.\(^2\) For example, revised PM emission estimates for the year 2010, of which DPM is a major component of total PM, have decreased by 83 percent from previous 2010 emissions estimates for the San Francisco Bay Area Air Basin (SFBAAB).\(^3\) Approximately half of the reduction in emissions can be attributed to the economic recession and the other half can be attributed to updated methodologies used to better assess construction emissions.\(^4\)

Additionally, a number of federal and state regulations are requiring cleaner off-road equipment. Specifically, both the U.S. EPA and the State of 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

\(^{1}\) California Air Resources Board, *Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements*, October 2010.

\(^{2}\) Ibid.


\(^{4}\) California Air Resources Board, *Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements*, October 2010.
benefits of these regulations will not be realized for several years, the U.S. EPA estimates that by implementing the federal Tier 4 standards, NOx and PM emissions will be reduced by more than 90 percent.\textsuperscript{76}

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 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.\textsuperscript{77}

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.

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.


\textsuperscript{77} Bay Area Air Quality Management District, \textit{CEQA Air Quality Guidelines}, May 2011.
The proposed project would require construction activities for the approximate 22-month construction period. Project construction activities would result in short-term emissions of DPM and other TACs. The project site is located in an area that already experiences poor air quality and project construction activities would generate additional air pollution, affecting nearby sensitive receptors and resulting in a significant impact. Implementation of Mitigation Measure M-AQ-2, Construction Air Quality, would reduce the magnitude of this impact to a less-than-significant level. While emission reductions from limiting idling, educating workers and the public and properly maintaining equipment are difficult to quantify, other measures, specifically the requirement for equipment with Tier 2 engines and Level 3 Verified Diesel Emission Control Strategy (VDECS) can reduce construction emissions by 89 to 94 percent compared to equipment with engines meeting no emission standards and without a VDECS.\(^7\) Emissions reductions from the combination of Tier 2 equipment with level 3 VDECS is almost equivalent to requiring only equipment with Tier 4 Final engines, which is not yet available for engine sizes subject to the mitigation. Therefore, compliance with Mitigation Measure M-AQ-2, Construction Air Quality, would reduce construction emissions impacts on nearby sensitive receptors to a less-than-significant level.

\(^7\) PM emissions benefits are estimated by comparing off-road PM emission standards for Tier 2 with Tier 1 and 0. Tier 0 off-road engines do not have PM emission standards, but the United States Environmental Protection Agency’s *Exhaust and Crankcase Emissions Factors for Nonroad Engine Modeling – Compression Ignition* has estimated Tier 0 engines between 50 horsepower (hp) and 100 hp to have a PM emission factor of 0.72 grams per horsepower-hour (g/hp-hr) and greater than 100 hp to have a PM emission factor of 0.40 g/hp-hr. Therefore, requiring off-road equipment to have at least a Tier 2 engine would result in between a 25 percent and 63 percent reduction in PM emissions, as compared to off-road equipment with Tier 0 or Tier 1 engines. The 25 percent reduction comes from comparing the PM emission standards for off-road engines between 25 hp and 50 hp for Tier 2 (0.45 gram per brake horse power-hour [g/bhp-hr]) and Tier 1 (0.60 g/bhp-hr). The 63 percent reduction comes from comparing the PM emission standards for off-road engines above 175 hp for Tier 2 (0.15 g/bhp-hr) and Tier 0 (0.40 g/bhp-hr). In addition to the Tier 2 requirement, ARB Level 3 VDECSs are required and would reduce PM by an additional 85 percent. Therefore, the mitigation measure would result in between an 89 percent (0.0675 g/bhp-hr) and 94 percent (0.0225 g/bhp-hr) reduction in PM emissions, as compared to equipment with Tier 1 (0.60 g/bhp-hr) or Tier 0 engines (0.40 g/bhp-hr).
Mitigation Measure M-AQ-2: Construction Air Quality. The project sponsor or the project sponsor’s contractor shall comply with the following:

Engine Requirements:

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

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

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

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

Waivers:

- The San Francisco Planning Department Environmental Review Officer or designee (ERO) may waive the alternative source of power requirement of above if an alternative source of power is limited or infeasible at the project site. If the ERO grants the waiver, the contractor must submit documentation that the equipment used for onsite power generation meets the engine requirements above.
The ERO may waive the equipment requirements above if: a particular piece of off-road equipment with an ARB Level 3 VDECS is technically not feasible; the equipment would not produce desired emissions reduction due to expected operating modes; installation of the equipment would create a safety hazard or impaired visibility for the operator; or, there is a compelling emergency need to use off-road equipment that is not retrofitted with an ARB Level 3 VDECS. If the ERO grants the waiver, the contractor must use the next cleanest piece of off-road equipment, according to **Table M-AQ-2** below.

**Table M-AQ-2: Off-Road Equipment Compliance Step-Down Schedule**

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

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

**Alternative fuels are not a VDECS.**

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

The Plan shall include estimates of the construction timeline by phase, with a description of each piece of off-road equipment required for every construction phase. The description may include, but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For VDECS installed, the description may include: technology type, serial number, make, model, manufacturer, ARB verification number level, and installation date and hour meter reading on installation date. For off-road equipment using alternative fuels, the description shall also specify the type of alternative fuel being used.
• The project sponsor shall ensure that all applicable requirements of the Plan have been incorporated into the contractor’s contract specifications. The Plan shall include a certification statement that the contractor agrees to comply fully with the Plan.

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

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

Implementation of Mitigation Measure M-AQ-2, Construction Air Quality, would reduce construction emissions on nearby sensitive receptors to a less-than-significant level. This topic will not be discussed in the EIR.

Operational Air Quality Impacts

Long-term air emission impacts are those associated with area sources and mobile sources related to the proposed project. In addition to the short-term construction emissions, the project would generate long-term air emissions, such as those associated with changes in permanent use of the project site. These long-term emissions are primarily mobile source emissions that would result from vehicle trips associated with the proposed project. Area sources, such as natural gas heaters, landscape equipment, and use of consumer products, would also result in pollutant emissions.
Impact AQ-3: During project operations, the proposed project 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. \textit{(less-than-significant impact)}

The BAAQMD has developed screening criteria to provide lead agencies with a conservative indication of whether the proposed project would result in potentially significant air quality impacts. If all of the screening criteria are met by a proposed project, then the lead agency would not need to perform a detailed air quality assessment of the proposed project’s emissions. These screening levels are generally representative of new development without any form of mitigation measures taken into consideration. In addition, the screening criteria do not account for project design features, attributes, or local development requirements that could also result in lower emissions.

As shown in \textbf{Table 8}, p. 98, for mid-rise apartment land uses, the BAAQMD screening size for operational criteria pollutants is 494 dwelling units. Since the proposed project would include 108 dwelling units, based on BAAQMD screening criteria, operation of the proposed project would result in a less-than-significant impact to air quality from criteria air pollutant and precursor emissions. This topic will not be further discussed in the EIR.

Impact AQ-4: Implementation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations. \textit{(less-than-significant impact)}

\textbf{Excessive Cancer Risk}

According to the BAAQMD, a project would result in a significant impact if it would: individually expose sensitive receptors to TACs resulting in an increased cancer risk greater than 10.0 in one million, an increased non-cancer risk of greater than 1.0 on the hazard index (chronic or acute), or an annual average ambient PM$_{2.5}$ increase greater than 0.3 $\mu g/m^3$. A significant cumulative impact would occur if the project in combination with other projects located within a 1,000-foot radius of the project sites would expose sensitive receptors to TACs resulting in an increased cancer risk greater than 100.0 in one million, an increased non-cancer risk of greater than 10.0 on the hazard index (chronic), or an ambient PM$_{2.5}$ increase greater than 0.8 $\mu g/m^3$ on an annual average basis.
The project site is located in the Tenderloin neighborhood of San Francisco which is a high-density downtown neighborhood with a variety of surrounding uses. The closest sensitive receptors are residential uses located immediately east of the project site. Construction of the proposed project may expose surrounding sensitive receptors to airborne particulates, as well as a small quantity of construction equipment pollutants (i.e., usually diesel-fueled vehicles and equipment). However, project construction emissions would be below the BAAQMD significance thresholds and once the project is constructed, the project would not be a source of substantial emissions. Therefore, sensitive receptors are not expected to be exposed to substantial pollutant concentrations during project construction or operation, and potential impacts would be considered less than significant.

Based on the foregoing, the proposed project would not expose sensitive receptors to substantial pollutant contributions. Therefore, this impact would be less than significant, and no mitigation measures would be required. This topic will not be discussed in the EIR.

**Siting Sensitive Land Uses**

The proposed project would include development of 108 dwelling units, which would be considered a sensitive land use for the purposes of air quality evaluation. For sensitive use projects within the APEZ as defined by Article 38, such as the proposed project, Article 38 requires that the project sponsor submit an Enhanced Ventilation Proposal for approval by the San Francisco Department of Public Health (SFDPH) that achieves protection from PM\(_{2.5}\) (fine particulate matter) equivalent to that associated with a Minimum Efficiency Reporting Value 13 (MERV 13) filtration. DBI will not issue a building permit without written notification from the Director of Public Health that the applicant has an approved Enhanced Ventilation Proposal.

The project sponsor would be required to submit an application to SFDPH in compliance with Article 38. The regulations and procedures set forth by Article 38 would protect sensitive receptors occupying the proposed residential units. This topic will not be discussed in the EIR.
**Clean Air Plan Consistency**

The applicable air quality plan is the BAAQMD 2017 Clean Air Plan, which was adopted on April 19, 2017. The 2017 Clean Air Plan/Regional Climate Protection Strategy serves as a roadmap for the BAAQMD to reduce air pollution and protect public health and the global climate. The 2017 Clean Air Plan also includes measures and programs to reduce emissions of fine particulates and toxic air contaminants. In addition, the regional climate protection strategy is included in the 2017 Clean Air Plan, which identifies potential rules, control measures, and strategies that the BAAQMD can pursue to reduce greenhouse gases throughout the Bay Area.

**Impact AQ-5: Implementation of the proposed project would not conflict with or obstruct implementation of the local applicable air quality plan. (less-than-significant impact)**

Consistency with the 2017 Clean Air Plan is determined by whether or not the proposed project would result in significant and unavoidable air quality impacts or hinder implementation of control measures (e.g., excessive parking or preclude extension of transit lane or bicycle path). As indicated in the analysis that follows, the proposed project would result in less-than-significant operational and construction-period emissions. Therefore, the proposed project supports the goals of the Clean Air Plan and would not conflict with any of the control measures identified in the plan or designed to bring the region into attainment. Additionally, the proposed project would not substantially increase the population, vehicle trips, or vehicle miles traveled. The proposed project would not hinder the region from attaining the goals outlined in the Clean Air Plan. Therefore, the proposed project would not hinder or disrupt implementation of any control measures from the Clean Air Plan.

This impact would be less than significant, and no mitigation measures would be required. This topic will not be discussed in the EIR.

**Impact AQ-6: Implementation of the proposed project would not result in a cumulatively considerable net increase of a criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard. (less-than-significant impact)**
CEQA defines a cumulative impact as two or more individual effects, which when considered together, are considerable or which compound or increase other environmental impacts. According to the BAAQMD, air pollution is largely a cumulative impact and no single project is sufficient in size to itself result in nonattainment of ambient air quality standards. In developing the thresholds of significance for air pollutants used in the analysis above, BAAQMD considered the emission levels for which a project’s individual emissions would be cumulatively considerable. The BAAQMD CEQA Air Quality Guidelines indicate that if a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region’s existing air quality conditions. If daily average or annual emissions of operational-related criteria air pollutants exceed any applicable threshold established by the BAAQMD, the proposed project would result in a cumulatively significant impact. The opposite is also true, meaning that if project-level thresholds would not be exceeded, the proposed project would not result in a cumulatively considerable net increase of a criteria pollutant.

As discussed above, implementation of the proposed project would generate less-than-significant criteria air pollutant and precursor emissions. Therefore, the project would not make a cumulatively considerable contribution to regional air quality impacts. No mitigation measures would be required, and this topic will not be discussed in the EIR.

**Impact AQ-7: Implementation of the proposed project would not create objectionable odors affecting a substantial number of people. (less-than-significant impact)**

During project construction, some odors may be present due to diesel exhaust. However, these odors would be temporary and limited to the construction period. The proposed project would not include any activities or operations that would generate objectionable odors and once operational, the project would not be a source of odors. For these reasons, the proposed project would not create objectionable odors affecting a substantial number of people. Therefore, odor impacts would be less than significant and no mitigation is required. This topic will not be discussed in the EIR.

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

As discussed above, the project site is located in an area that already experiences poor air quality, and project construction activities would generate additional air pollution, affecting nearby sensitive receptors and resulting in a considerable contribution to cumulative health risk impacts on nearby sensitive receptors. The proposed project would be required to implement Mitigation Measure MAQ-2, Construction Air Quality, as noted above, which would reduce construction-period emissions and reduce the proposed project’s contribution to cumulative air quality impacts to a less-than-significant level.

<table>
<thead>
<tr>
<th>Topics:</th>
<th>Potentially Significant Impact</th>
<th>Less Than Significant with Mitigation Incorporated</th>
<th>Less Than Significant Impact</th>
<th>No Impact</th>
<th>Not Applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td>7. GREENHOUSE GAS EMISSIONS— Would the project:</td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
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</table>
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 continue to 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 Strategies to Address Greenhouse Gas Emissions,79 which presents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco’s qualified GHG reduction strategy in compliance with the CEQA Guidelines. These GHG reduction actions have resulted in a 23.3 percent reduction in GHG emissions in 2012 compared to 1990 levels,80 exceeding the year 2020 reduction goals outlined in the BAAQMD’s Bay Area 2010 Clean Air Plan, Executive Order (EO) S-3-05, and Assembly Bill (AB) 32 (also known as the Global Warming Solutions Act).81

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

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81 Executive Order S-3-05, Assembly Bill 32, and the Bay Area 2010 Clean Air Plan set a target of reducing GHG emissions to below 1990 levels by year 2020.
under EO S-3-0582, EO B-30-15, and Senate Bill (SB) 32, the city’s GHG reduction goals are consistent with EO S-3-05, EO B-30-15, AB 32, SB 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, this analysis is in a cumulative context, and this section does not include an individual project-specific impact statement.

82 Office of the Governor, Executive Order S-3-05, June 1, 2005, https://www.gov.ca.gov/news.php?id=1861, accessed June 23, 2017. 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 metric tons of carbon dioxide equivalents [MTCO2E]); by 2020, reduce emissions to 1990 levels (approximately 427 million MTCO2E); and by 2050 reduce emissions to 80 percent below 1990 levels (approximately 85 million MTCO2E). Because of the differential heat absorption potential of various GHGs, GHG emissions are frequently measured in “carbon dioxide-equivalents,” which present a weighted average based on each gas’s heat absorption (or “global warming”) potential.


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

85 Senate Bill 32 amends California Health and Safety Code Division 25.5 (also known as the California Global Warming Solutions Act of 2006) by adding Section 38566, which directs that statewide greenhouse gas emissions to be reduced by 40 percent below 1990 levels by 2030.

86 Senate Bill 32 was paired with Assembly Bill 197, which would modify the structure of the State Air Resources Board; institute requirements for the disclosure of greenhouse gas emissions criteria pollutants, and toxic air contaminants; and establish requirements for the review and adoption of rules, regulations, and measures for the reduction of greenhouse gas emissions.
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 impact)

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.

The proposed project would increase the intensity of use of the site by constructing 108 new residential units and 2,600 square feet of commercial space. Therefore, the proposed project would contribute to annual long-term increases in GHGs as a result of increased vehicle trips (mobile sources) and residential operations that result in an increase in energy use, water use, 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 TSF and bicycle parking requirements would reduce the proposed project’s transportation-related emissions, as applicable. 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, and water conservation and irrigation
ordinances, which would promote energy and water efficiency, thereby reducing the proposed project’s energy-related GHG emissions.\textsuperscript{87}

The proposed project’s waste-related emissions would be reduced through compliance with the city’s recycling and compositing ordinance, construction and demolition debris recovery ordinance, and green building code requirements. 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\textsuperscript{88} and reducing the energy required to produce new materials.

No existing trees would be removed from the project site. Compliance with the city’s street tree planting requirements would serve to increase carbon sequestration. Regulations requiring low-emitting finishes would reduce volatile organic compounds (VOCs).\textsuperscript{89} Thus, the proposed project was determined to be consistent with San Francisco’s GHG reduction strategy.\textsuperscript{90}

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

\textsuperscript{87} Compliance with water conservation measures reduce the energy (and GHG emissions) required to convey, pump and treat water required for the project.

\textsuperscript{88} Embodied energy is the total energy required for the extraction, processing, manufacture and delivery of building materials to the building site.

\textsuperscript{89} 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.

\textsuperscript{90} San Francisco Planning Department, Greenhouse Gas Analysis: Compliance Checklist for 500 Turk Street, April 18, 2017.
also consistent with the GHG reduction goals of EO S-3-05, EO B-30-15, AB 32, SB 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. This topic will not be discussed in the EIR.

<table>
<thead>
<tr>
<th>Topics:</th>
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<tbody>
<tr>
<td>8. WIND AND SHADOW—</td>
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<tr>
<td>Would the project:</td>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a) Alter wind in a manner that substantially affects public areas?</td>
<td>✔</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?</td>
<td>☐</td>
<td>☐</td>
<td>☒</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

Impact WS-1: The proposed project would not alter wind in a manner that substantially affects public areas within the vicinity of the project area. 

A proposed project’s wind impacts are directly related to its height, orientation, design, location and surrounding development context. Based on wind analyses for other development projects in San Francisco, a building that does not exceed 85 feet, as measured under the planning code, generally has little potential to cause substantial changes to ground-level wind conditions, because such buildings are not of a sufficient height to direct wind downward in such a way that high wind speeds would increase to such a degree as to adversely affect pedestrian comfort levels or create hazardous wind conditions (generally defined as ground level wind speeds of 26 miles per hour as averaged over a single hour). Generally, tall, slab-like buildings tend to deflect wind downward. As wind flow comes over the edge of a roof or around a corner, it separates into streams at about three-quarters of the building height. Above this, the air flows up the face of the building and over the roof; below, it flows down to form a vortex in front of the building before rushing around the windward corners. The resulting increased wind speeds and turbulence at ground level can represent a hazard to
pedestrians. This phenomenon is greatest with a single tall building in an open area with no surrounding structures, and can vary substantially by building orientation, massing, and adjacency of other structures.

The proposed project would construct a 79-foot-tall, eight-story building that would be similar in height to many existing nearby buildings. Surrounding buildings generally range from two- to seven-stories in height and the approximately 250-foot-tall Federal Building and United States District Court House is located immediately south of the site. Thus, the proposed project would not alter wind in a manner that substantially affects public areas. This impact would be less than significant, and no mitigation measures would be required. This topic will not be discussed in the EIR.

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 impact)

In 1984, San Francisco voters approved an initiative known as “Proposition K, The Sunlight Ordinance,” which was codified as Planning Code section 295 in 1985. Planning Code section 295 generally prohibits new structures above 40 feet in height that would cast additional shadows on open space that is under the jurisdiction of the San Francisco Recreation and Park Commission between one hour after sunrise and one hour before sunset, at any time of the year, unless that shadow would not result in a significant adverse effect on the use of the open space. Public open spaces that are not under the jurisdiction of the Recreation and Park Commission as well as private open spaces are not subject to Planning Code section 295.

Implementation of the proposed project would result in the construction of a 79-foot-tall building, as measured under the planning code. A shadow fan prepared by the planning department indicated that the project could cast new shadow on the Turk and Hyde Mini-Park, located approximately 400 feet east of the project site, at the northwest corner of the Turk Street and Hyde Street intersection.91

91 San Francisco Planning Department, 500 Turk Street Preliminary Shadow Fan Analysis, September 29, 2016.
Therefore, per Planning Code section 295, a shadow analysis was prepared for the proposed project.92 A full-year refined shading diagram prepared as part of the report considers the full range of locations where new shading would occur once the presence of existing intervening buildings. The results of the analysis indicate that at no time of year would the proposed project cast net new shadows on the Turk and Hyde Mini-Park due to the presence of intervening buildings between the project site and the park.

The proposed project is expected to shade portions of streets, sidewalks, and private properties in the project vicinity at various times of the day throughout the year. However, shadows on streets and sidewalks would not exceed levels commonly expected in urban areas. In addition, the project site is also located immediately north of the 250-foot-tall multi-story Federal Building and United States District Court House, which is the primary source of shadow in the project vicinity, as are other intervening buildings. Although occupants of nearby properties may regard the net increase in shadow as undesirable, if noticeable, the limited increase in shading of private properties as a result of the proposed project would not be considered a significant impact under CEQA.

Given the reasons above, the proposed project would not create new shadow in a manner that substantially affects outdoor recreation facilities and other public areas. This impact would be less than significant, and no mitigation measures would be required. This topic will not be discussed in the EIR.

**Impact C-WS-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative wind or shadow impacts. (less-than-significant impact)**

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Wind

As discussed above, existing planning department data demonstrates that buildings shorter than 85 feet, as measured under the planning code, have little potential to cause substantial changes to ground-level wind conditions. Wind impacts are localized and site-specific, and the nearest cumulative development projects are one block away from the project site (the 101 Hyde Street and the 135 Hyde Street projects). Each of these cumulative development projects would also be subject to the 80-foot height limit. Therefore, the proposed project would not make a cumulatively considerable contribution to any potential cumulative wind impacts in the project site vicinity.

Shadow

The proposed project would not cast net new shadow on any nearby parks or public open spaces. All other projects in the project vicinity are subject to Planning Code section 295 and would have to undergo a shadow analysis to determine and avoid substantial net new shading of nearby parks or public open spaces. Therefore, the proposed project would not make a cumulatively considerable contribution to any potential cumulative shadow impact on parks and open spaces.

For the above reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative wind or shadow impact. No mitigation measures are necessary and this topic will not be discussed in the EIR.
### Topics:

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<tr>
<th>9. RECREATION— Would the project:</th>
<th>Potentially Significant Impact</th>
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<th>Less Than Significant Impact</th>
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<tbody>
<tr>
<td>a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?</td>
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<td>b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?</td>
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<td>c) Physically degrade existing recreational resources?</td>
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**Impact RE-1:** The proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. *(less-than-significant impact)*

The neighborhood parks and other recreational facilities closest to the project site are Turk and Hyde Mini-Park (approximately 400 feet, or 0.1 miles east of the project site), Civic Center Plaza (0.2 miles south), Sergeant John Macaulay Park (0.2 miles north), Tenderloin Children’s Playground (0.3 miles northeast), Father Alfred E. Boeddeker Park (0.4 miles northeast), and Jefferson Square Park (0.4 miles west). The proposed project would increase the population of the project site by approximately 157 residents. The residential population growth would increase the demand for recreational facilities. The proposed project would partially offset the demand for recreational facilities by providing approximately 5,240 square feet of common open space for use by project residents in a ground floor courtyard. Project residents and employees of the commercial ground floor space may use parks, open spaces, and other recreational facilities in the project vicinity. However, any additional use of these recreational facilities is expected to be modest based on the size of the projected population increase and would not result in the substantial physical deterioration of recreational facilities. Therefore, this impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

**Impact RE-2:** The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. *(less-than-significant impact)*
As noted above, the proposed project would provide a total of approximately 5,240 square feet of common open space for use by project residents a ground level courtyard. This open space would partially offset the demand for recreational facilities. In addition, the project site is within walking distance to a number of parks, open spaces, or other recreational facilities, as discussed above. It is anticipated that these existing recreational facilities would accommodate any increase in demand for recreational resources generated by the project residents. For these reasons, the construction of new or the expansion of existing recreational facilities that might have an adverse physical effect on the environment, would not be required. This impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

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

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

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

Cumulative development in the project vicinity would result in an intensification of land uses and a cumulative increase in the demand for recreational facilities and resources. The city has accounted for such growth as part of the recreation and open space element of the general plan. In addition, San Francisco voters passed two bond measures, in 2008 and 2012, to fund the acquisition, planning, and renovation of the city’s network of recreational resources. As discussed above, there are six parks, open spaces, or other recreational facilities within less than 0.5 miles of the project site. It is expected that these existing recreational facilities would be able to accommodate the increase in demand for recreational resources generated by the proposed project and nearby cumulative development projects (approximately 2,517 new residents), which would also comply with on-site open space
requirements. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future project in the project vicinity to create a significant cumulative impact on recreational facilities or resources. This impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

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<tr>
<td>10. UTILITIES AND SERVICE SYSTEMS—Would the project:</td>
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<td>a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?</td>
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<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>
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<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>
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<td>d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?</td>
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<td>e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?</td>
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<td>f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?</td>
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<td>g) Comply with federal, state, and local statutes and regulations related to solid waste?</td>
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The project site is within an urban area that is served by utility service systems, including water, wastewater and stormwater collection and treatment, and solid waste collection and disposal. The proposed project would add new daytime and nighttime population to the site that would increase
the demand for utilities and service systems on the site, but not in excess of amounts expected and provided for in the project area.

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

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

The project site is entirely covered with impervious surfaces comprised of the existing tire shop and automotive repair building and associated surface parking lot, and the proposed project would increase the amount of pervious surfaces on the site, resulting in less stormwater volume discharged through the combined sewer system. Specifically, according to the project sponsor, the project site is currently covered with approximately 18,906 square feet of impervious surface, and the proposed project would introduce 8,842 square feet of pervious surfaces to the site, with the remaining 10,064 square feet as impervious surfaces. While the proposed project would continue to contribute to sewage flows in the area, it would not cause collection treatment capacity of the sewer system in the city to be exceeded compared to exiting conditions. Because the project is fully developed at present, new development would not result in an increase in stormwater runoff. However, the project would be required to comply with the city’s stormwater design guidelines, and thus would reduce the total stormwater runoff volume and peak stormwater runoff rate, compared to existing conditions, through the use of low impact design approaches and best management practices such as rainwater reuse, landscape planters, and rain gardens. Specifically, for project sites with existing impervious surface coverage of greater than 50 percent, stormwater runoff rate and volume are required to be reduced by 25 percent relative to pre-development conditions for the two-year, 24-hour design storm.
The proposed project meets this requirement through a combination of on-grade stormwater planters and permeable paving systems. The proposed project would be required to comply with the SFPUC’s Stormwater Management Requirements and Design Guidelines and the SFPUC would review and approve the project’s stormwater compliance strategy.93

For the reasons discussed above, the proposed project would incrementally increase demand for and use of wastewater and stormwater services, but not in excess of amounts expected and provided for in this area. The proposed project would not exceed any applicable wastewater treatment requirements or otherwise conflict with RWQCB requirements, and the minor population increase associated with the proposed project would not exceed the capacity of the existing wastewater treatment provider or substantially increase the demand for wastewater treatment or stormwater drainage facilities requiring the construction of new facilities or expansion of existing facilities. This impact would be less than significant and no mitigation measures are required. This topic will not be discussed in the EIR.

Impact UT-2: The proposed project would not require expansion or construction of new water supply or treatment facilities. (less-than-significant impact)

The proposed project would add affordable residential units and new commercial uses to the project site, which would increase the demand for water on the site compared to existing conditions, but not in excess of amounts expected and provided for in the project area. Although the proposed project would incrementally increase the demand for water in San Francisco, the estimated increase in demand could be accommodated within anticipated water use and supply for the city, because according to the SFPUC, sufficient supplies are available to serve new development.94 The proposed project would also be designed to incorporate water-conserving measures, such as low-flush toilets


and urinals, as required by the San Francisco Green Building Ordinance. The project site is not located within a designated recycled water use area, as defined in the Recycled Water Ordinance 390-91 and 393-94 and the project is under 250,000 gross square feet; thus, the project is not required to install a recycled water system. Since the proposed project’s water demand could be accommodated by the existing and planned supply anticipated under the San Francisco Public Utilities Commission’s (SFPUC’s) 2015 Urban Water Management Plan, the proposed project would result in less-than-significant impacts related to water services. No mitigation measures would be required and this topic will not be discussed in the EIR.

**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. (less-than-significant impact)**

In September 2015, the city entered into a landfill disposal agreement with Recology, Inc. for disposal of all solid waste collected in San Francisco at the Recology Hay Road Landfill in Solano County for nine years or until 3.4 million tons have been disposed, whichever occurs first. The city would have an option to renew the agreement for a period of six years or until an additional 1.6 million tons have been disposed, whichever occurs first. The Recology Hay Road Landfill is permitted to accept up to 2,400 tons per day of solid waste, at that maximum rate the landfill would have capacity to accommodate solid waste until approximately 2034. At present, the landfill receives an average of approximately 1,850 tons per day from all sources, with approximately 1,200 tons per day from San Francisco; at this rate landfill closure would occur in 2041. The city’s contract with the Recology Hay Road Landfill is set to terminate in 2031 or when 5 million tons have been disposed, whichever occurs first. At that point, the city will either further extend the Recology Hay Road Landfill contract or find and entitle another landfill site. The proposed project, which would include demolition and construction waste and operational waste associated with the residential and commercial uses, would

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generate a minimal amount of solid waste to be deposited at the landfill. Therefore, the proposed project would be served by landfills with sufficient permitted capacity to accommodate its solid waste disposal needs. This impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

**Impact UT-4: Construction and operation of the proposed project would comply with all applicable statutes and regulations related to solid waste. (less-than-significant impact)**

The California Integrated Waste Management Act of 1989 (AB 939) requires municipalities to adopt an integrated waste management plan to establish objectives, policies, and programs relative to waste disposal, management, source reduction, and recycling. Reports filed by the San Francisco Department of the Environment show the city generated approximately 870,000 tons of waste material in 2000. By 2010, that figured decreased to approximately 455,000 tons. Waste diverted from landfills is defined as recycled or composted. San Francisco had a goal of 75 percent solid waste diversion by 2010, which it exceeded at 80 percent diversion in 2012 (the most recent year reported), and has a goal of 100 percent solid waste diversion or “zero waste” to landfill or incineration by 2020.

San Francisco Ordinance No. 27-06 requires mixed construction and demolition debris to be transported by a Registered Transporter and taken to a registered facility that must recover for reuse or recycling and divert from landfill at least 65 percent of all received construction and demolition debris. The San Francisco Green Building Code also requires certain projects to submit a recovery plan to the Department of the Environment demonstrating recovery or diversion of at least 75 percent of all demolition debris. San Francisco’s Mandatory Recycling and Composting Ordinance No. 100-09 requires all properties and everyone in the city to separate their recyclables, compostables, and landfill trash.

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Therefore, given the above, the construction and operation of the project would result in a less-than-significant impact regarding compliance with all applicable statutes and regulations related to solid waste. No mitigation measures would be required and this topic will not be discussed in the EIR.

Impact C-UT-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact related to utilities or service systems. (*less-than-significant impact*)

Cumulative development in the project site vicinity would incrementally increase demand on citywide utilities and service systems, but not beyond levels anticipated and planned for by public service providers. The SFPUC has accounted for such growth in its water demand and wastewater service projections, and the city has implemented various programs to divert 80 percent of its solid waste from landfills. Nearby cumulative development projects would be subject to the same water conservation, wastewater discharge, recycling and composting, and construction demolition and debris ordinances applicable to the proposed project. Compliance with these ordinances would reduce the effects of nearby cumulative development projects to less-than-significant levels. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact on utilities and service systems. No mitigation measures would be required and this topic will not be discussed in the EIR.

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<td>11. PUBLIC SERVICES—</td>
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<td>Would the project:</td>
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<td>a) Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?</td>
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The proposed project’s impacts on parks and recreation are discussed under **Section H.9, Recreation**, pp. 116–118. Impacts to other public services are discussed below.

**Impact PS-1: The proposed project would not result in a substantial adverse physical impact associated with the provision of police services. (less-than-significant impact)**

The project site currently receives police services from the San Francisco Police Department. Police protection within the vicinity is provided by the Tenderloin Police Station located at 301 Eddy Street, approximately 0.3 miles east of the project site. The proposed project would result in the addition of 108 residential units and approximately 157 residents to the project site, which would increase the demand for police protection services. However, the increase would be incremental, funded through project-related increases to the city’s tax base, and would not be substantial given the overall demand for police protection services on a citywide level. In addition, the Tenderloin Police Station would be able to provide the necessary police services and crime prevention in the area. Meeting the service demand associated with 108 residential units and ground floor commercial uses at the project site would not require the construction of new police facilities that could cause significant environmental impacts. As such the impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

**Impact PS-2: The proposed project would not result in a substantial adverse physical impact associated with the provision of fire services. (less-than-significant impact)**

The project site receives fire protection services from the San Francisco Fire Department. Fire stations located nearby include Station 3, at 1067 Post Street approximately 0.4 miles from the project site, and Station 36, at 109 Oak Street approximately 1.0 mile from the project site. The proposed project would result in the addition of 108 residential units and ground floor commercial uses to the project site and is unlikely to result in a significant increase in demand for fire calls in the project area. Moreover, the proposed project would be required to comply with all applicable building and fire code requirements, which identify specific fire protection systems, including, but not limited to, the provision of state-mandated smoke alarms, fire alarm and sprinkler systems, fire extinguishers, fire-rated walls, the required number and location of egress with appropriate distance separation, and
emergency response notification systems. Compliance with all applicable building and fire codes, would further reduce the demand for fire department service and oversight.

Given that the proposed project would not result in a fire service demand beyond the projected growth for the area or the city, the proposed project would not result in the need for new fire protection facilities, and would have no adverse impact on the physical environment related to the construction of new or physically altered fire protection facilities. This impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

Impact PS-3: The proposed project would not result in a substantial adverse physical impact associated with the provision of school services. (less-than-significant impact)

The San Francisco Unified School District (the school district) provides public primary and secondary education in the City and County of San Francisco. The Tenderloin Community Elementary School at 627 Turk Street is approximately 0.1 mile west of the project site. Francisco Middle School at 2190 Powell Street is located approximately 2.2 miles north of the project site. The nearest high schools to the project site are Ida Wells High School located approximately 1.3 miles west of the project site and Galileo Academy of Science and Technology located approximately 1.5 miles north of the project site.

Based on a student generation rate employed by the school district of 0.203 students per dwelling unit, the 108 residential units that would be built as part of the proposed project could generate approximately 22 K-12 students. Similar to other citywide developments, the proposed project would be assessed a school development impact fee of $3.48 per square foot (or more) for the proposed residential space and $0.388 per square foot (or more) of commercial space. The estimated 22 additional new students would not require the construction or expansion of school facilities. It is anticipated that these students could be accommodated by existing schools under the jurisdiction of the school district since the school district is currently not experiencing high growth rates, and facilities throughout the City and County are generally underutilized. The school district is not planning to construct new schools near the project site. Given that the school district has adequate facilities to accommodate growth, the new student generated by the proposed project would not substantially increase demand for school facilities in San Francisco and would not result in a
significant impact. In addition, as with all new development, the project sponsor would be required to pay one-time school impact fees under Government Code section 65995(b)(3), as stated above, which could be used by the school district for costs associated with providing facilities for new students.

In addition, The Leroy F. Greene School Facilities Act of 1998, or Senate Bill 50 (SB 50), restricts the ability of local agencies to deny land use approvals on the basis that public school facilities are inadequate. SB 50 establishes the base amount of allowable developer fees for school facilities at $2.24 per square foot of residential construction and $0.21 per square foot of commercial construction as of 2006. These fees are intended to address local school facility needs resulting from new development. Public school districts, such as the San Francisco Unified School District, may, however, impose higher fees provided they meet the conditions outlined in the act.

Based on the foregoing, the proposed project would not result in a substantially increased demand for school facilities, and would not require new or expanded school facilities. Therefore, this impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

**Impact PS-4: The proposed project would not result in a substantial adverse physical impact associated with the provision of other public services, such as libraries. (less-than-significant impact)**

Implementation of the proposed project would add approximately 157 residents to the project site, which would increase the demand for other public services such as libraries. This increase in demand would not be substantial given the overall demand for library services on a citywide basis. The San Francisco Public Library operates 28 branches throughout the city, and it is anticipated that the Main Library, which is located 0.2 miles south of the project site, would be able to accommodate the minor increase in demand for library services generated by the proposed project. For these reasons, the proposed project would not require the construction of new or alteration of existing governmental facilities. This impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.
Impact C-PS-1: The proposed project, in combination with past, present, and reasonably foreseeable projects, would not result in a cumulative impact on public services. *less-than-significant impact*

Cumulative development in the project vicinity would result in a minor intensification of land uses and a cumulative increase in the demand for fire protection, police protection, school services, and other public services. The fire department, the police department, the school district, the public library, and other city agencies have accounted for such growth in providing public services to the residents of San Francisco. Nearby cumulative development projects would be subject to many of the same development impact fees applicable to the proposed project. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact on public services. This impact would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

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<tr>
<td>12. BIOLOGICAL RESOURCES—Would the project:</td>
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<td>a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</td>
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<td>b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</td>
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<td>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?</td>
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12. BIOLOGICAL RESOURCES—Would the project:

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 located within a built environment and does not contain riparian habitat or other sensitive natural communities as defined by the California Department of Fish and Wildlife and the United States Fish and Wildlife Service; therefore, Topic 12.b is not applicable to the proposed project. In addition, the project area does not contain wetlands as defined by Section 404 of the Clean Water Act; therefore, Topic 12.c is also not applicable. Finally, there are no adopted habitat conservation plans, natural community conservation plans, of other approved local, state, or regional habitat conservation plans applicable to the project site. Therefore, implementation of the proposed project could not conflict with the provisions of any such plan and Topic 12.f is not applicable to the proposed project.

Impact BI-1: The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species, riparian habitat or sensitive natural communities, and would not interfere substantially with any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. (less-than-significant impact)

The project site is a developed lot in a built urban environment and does not include any candidate, sensitive, or special-status species, any riparian habitat, or other sensitive natural community identified in regional plans, policies, or regulations or by the California Department of Fish and
Wildlife or U.S. Fish and Wildlife Service, nor would it interfere substantially with any native resident or migratory species, or species movement or migratory corridors.

Migrating birds do pass through San Francisco and nesting birds, their nests, and eggs are fully protected by California Fish and Game Code (sections 3503, 3503.5) and the federal Migratory Bird Treaty Act. Although the proposed project would be subject to the Migratory Bird Treaty Act, the site does not contain habitat supporting migratory birds.

San Francisco is within the Pacific Flyway, a major north-south route of travel for migratory birds along the western portion of the Americas. Planning Code section 139, standards for bird-safe buildings, establishes building design standards to reduce avian mortality rates associated with bird strikes. This ordinance focuses on location-specific hazards and building feature-related hazards. Location-specific hazards apply to buildings in, or within 300 feet of and having a direct line of sight to, an urban bird refuge, which is defined as an open space “two acres and larger dominated by vegetation, including vegetated landscaping, forest, meadows, grassland, or wetlands, or open water.” The project site is not in or within 300 feet of an urban bird refuge; therefore, the standards related to location-specific hazards are not applicable to the proposed project. Feature-related hazards, which can occur on buildings anywhere in San Francisco, are defined as freestanding glass walls, wind barriers, skywalks, balconies, and greenhouses on rooftops that have unbroken glazed segments of 24 square feet or larger. The proposed project would comply with the feature-related standards of Planning Code section 139 by using bird-safe glazing treatment on 100 percent of any feature-related hazards, as defined under that Planning Code section.

Implementation of the proposed project would not modify any natural habitat. There are no existing trees or other vegetation on the project site that would be removed as part of the proposed project. This impact would be less than significant with compliance with city-adopted regulations for bird safe buildings. No mitigation measures would be required and this topic will not be addressed in the EIR.
Impact BI-2: The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. *(no impact)*

The city’s urban forestry ordinance, Public Works Code sections 801 et. seq., requires a permit from the San Francisco Department of Public Works to remove any protected trees. There are no existing trees or other vegetation on the project site that would be removed as part of the proposed project, and as previously discussed, the proposed project would plant a total of 14 street trees. The proposed project would not conflict with any local policies or ordinances that protect biological resources, and no impact would occur. This topic will not be addressed in the EIR.

Impact C-BI-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact related to biological resources. *(less-than-significant impact)*

Cumulative development in the project vicinity would result in the construction of multi-story buildings that can injure or kill birds in the event of a collision and would result in the removal of existing street trees or other vegetation. Nearby cumulative development projects would be subject to the same bird-safe building and urban forestry ordinances applicable to the proposed project. Compliance with these ordinances would reduce the effects of nearby cumulative development projects to less-than-significant levels. Moreover, there is no record of candidate, sensitive, or special-status species, any riparian habitat, or other sensitive natural community in the project vicinity. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact on biological resources. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.
### Topics:

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<th>Topics:</th>
<th>Potentially Significant Impact</th>
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<th>No Impact</th>
<th>Not Applicable</th>
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#### 13. GEOLOGY AND SOILS—

Would the project:

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

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

ii) Strong seismic ground shaking?

iii) Seismic-related ground failure, including liquefaction?

iv) Landslides?

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

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

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

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

f) Change substantially the topography or any unique geologic or physical features of the site?

g) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The project site would be connected to the city’s existing sewer system and would not require use of septic systems. Therefore, topic 13.e would not be applicable to the project site.

The analysis in this section is based, in part, on the geotechnical investigation prepared for the proposed project.99 The project site is underlain by loose sandy fill material, medium-dense to very

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dense, poorly graded sand, medium stiff sandy clay, and dense to very dense sand. Groundwater was measured at depths of approximately 31 feet below the ground surface. The geotechnical investigation concluded that the proposed project would be supported on a mat foundation bearing on improved soil. Excavation would be limited to between 2 and 6 feet for utility connections, and the proposed mat foundation and support for the mat foundation system would be provided through ground improvement of the soil, with maximum soil disturbance occurring approximately 17 to 21 feet below grade, depending whether the ground improvement is on the downslope or the upslope portion of the project site, respectively. Possible ground improvement methods include drilled displacement columns, aggregate piers, or rapid impact compaction.

**Impact GE-1: The proposed project would not increase the exposure of 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, liquefaction, lateral spreading, or landslides. (less-than-significant impact)**

Due to the potential for strong ground shaking in the San Francisco Bay Area, this impact would be considered significant if the proposed project increased the exposure of 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, liquefaction, lateral spreading, or landslides. Currently, the project site is developed with a concrete tire shop and automotive service building and associated hardscape. The proposed project would result in the construction of residential and commercial uses on the site, increasing the number of residents and users on the site. However, as discussed below, the project site is not located in an area that would substantially increase the risk of exposure to seismic hazards; therefore, this impact would be less than significant.

The project site is not located within an earthquake fault zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act and no known or potentially active fault exists on the site. No active faults have been mapped on the project site by the United States Geological Survey or the California
Geological Survey.\textsuperscript{100} In a seismically active area, such as the San Francisco Bay Area, the possibility exists for future faulting in areas where no faults previously existed. However, since faults with known surface rupture have been mapped in California, and no evidence of active faulting on the site has been found, the potential for impacts to the proposed project due to fault rupture are less than significant.

However, the project site is located within a seismic hazard zone and, like the entire San Francisco Bay Area, is subject to ground shaking in the event of an earthquake on regional fault lines.\textsuperscript{101} The site is located approximately 7.3 miles east of the San Andreas Fault and 11 miles west of the Hayward Fault. The 2007 Working Group on California Earthquake Probabilities estimates that there is a 63 percent chance that a magnitude 6.7 or greater earthquake will occur in the San Francisco Bay Area within 30 years. The Association of Bay Area Governments (ABAG) has classified the Modified Mercalli Intensity Shaking Severity Level of ground shaking in the project vicinity due to an earthquake on the North Golden Gate segment of the San Andreas Fault System as “VIII-Very Strong.”\textsuperscript{102} Therefore, it is likely that the site would experience periodic minor or major earthquakes associated with a regional fault, resulting in strong to very strong ground shaking.

Ground shaking associated with an earthquake on one of the regional faults around the project site may result in ground failure, such as that associated with soil liquefaction, lateral spreading, and differential compaction. The project site is not located within a liquefaction hazard zone as mapped by the California Division of Mines and Geology. Borings at the site indicate that the liquefaction potential at the site is low and that post-liquefaction settlements of less than 1 inch would occur. Because the project site is generally flat and the liquefaction potential is low, lateral spreading would


be unlikely to occur. Risks associated with liquefaction and differential compaction would be further reduced with implementation of standard building engineering and design measures.

As shown on the official State of California Seismic Hazards Zone Map for San Francisco prepared under the Seismic Hazards Mapping Act of 1990,\(^\text{103}\) the project site is not located within an area subject to landslides (see Map 4 of the community safety element of the general plan). Therefore, the proposed project would result in less-than-significant landslide-related impacts.

As explained above, support for the proposed mat foundation system would be provided through ground improvement of the upper approximately 17 to 21 feet of soil to densify the soil. In addition, all applicable building code requirements would be met, including seismic requirements.

Given the above, the proposed project would not increase the exposure of 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, liquefaction, lateral spreading, or landslides. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

**Impact GE-2: The proposed project would not result in substantial loss of topsoil or erosion. (less-than-significant impact)**

The project site is currently covered with impervious surfaces and does not contain native topsoil. Although minimal excavation would occur as part of the proposed project, compliance with the city’s construction site water pollution prevention program\(^\text{104}\) would require the project sponsor to prepare and implement an erosion and sediment-control plan (subject to review by the city). Compliance with

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\(^\text{103}\) The Seismic Hazards Mapping Act was developed to protect the public from the effects of strong ground shaking, liquefaction, landslides, or other ground failure, and from other hazards caused by earthquakes. This act requires the State geologist to delineate various seismic hazard zones and requires cities, counties, and other local permitting agencies to regulate certain development projects within these zones.

\(^\text{104}\) San Francisco Municipal Code (Public Works Code) Part II. Chapter 10. Article 4.1. 40 GF Section 403.
this regulation would reduce and control site runoff during construction activities and reduce the potential for erosion to a less-than-significant level. Furthermore, as explained above, support for the proposed mat foundation system would be provided through ground improvement of the upper approximately 17 to 21 feet of soil to densify the soil, which would help prevent erosion. No mitigation measures would be required and this topic will not be discussed in the EIR.

**Impact GE-3: The proposed project would not be located on a geologic unit 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. (less-than-significant impact)**

The project site and vicinity do not include any hills or cut slopes that could cause or be subject to a landslide. Temporary slopes would be necessary during site excavations. If excavations undermine or remove support from the existing and adjacent structures, it may be necessary to underpin those structures. The final design of the foundation system would be included in a design-level geotechnical investigation that is based on site-specific data in accordance with building code requirements. According to the geotechnical investigation prepared for the project, soils at the site are capable of supporting a mat foundation in accordance with industry standards and building code requirements. As explained above, excavation would be limited to between 2 and 6 feet for utility connections and the proposed mat foundation and support for the mat foundation system would be provided through ground improvement of the soil, with maximum soil disturbance occurring approximately 17 to 21 feet below grade, depending whether the ground improvement is on the downslope or the upslope portion of the project site, respectively. Drilled piers may also be utilized to support the foundation or for any required shoring and/or required underpinning. Excavation activities occurring at depths greater than 5 feet may require the use of shoring and underpinning in accordance with the recommendations of the geotechnical report and San Francisco Building Code requirements. Groundwater is not anticipated to be encountered during excavation and grading activities.

Adherence to San Francisco Building Code requirements would ensure that the project applicant includes analysis of and mitigation for any potential impacts related to unstable soils as part of the design-level geotechnical investigation prepared for the proposed project; therefore, any potential
impacts related to unstable soils would be less than significant and no mitigation measures would be required. This topic will not be discussed in the EIR.

**Impact GE-4: The proposed project could be located on expansive soil, as defined in the California Building Code, creating substantial risk to life or property. (less-than-significant impact)**

Expansive soils expand and contract in response to changes in soil moisture, most notably when near surface soils vacillate between a saturated, low-moisture, and a saturated, high-moisture content condition. The presence of expansive soils is typically determined based on site-specific data. As noted above, the site is underlain by fill and sandy to clayey soils. Expansive soils may be encountered at the site; the San Francisco Building Code includes a requirement that the project applicant include analysis of the potential for soil expansion as part of the design-level geotechnical investigation prepared for the proposed project. Compliance with existing building code requirements (which the design-level geotechnical report would be required to comply with), would ensure that any potential impacts related to expansive soils would be less than significant. No mitigation measures would be required and this topic will not be addressed in the EIR.

**Impact GE-5: The proposed project would not substantially change the topography of the site or any unique geologic or physical features of the site. (less-than-significant impact)**

The project site topography gently slopes down to the southwest but does not contain unique topography. Minor excavation would be required at the site to support the building foundation. Therefore, the proposed project would have no impact with respect to alterations to topographical features. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

**Impact GE-6: The proposed project would not indirectly destroy a unique paleontological resource or site or unique geologic feature. (less-than-significant impact)**

Paleontological resources include fossilized remains or traces of animals, plants, and invertebrates, including their imprints, from a previous geological period. Collecting localities and the geologic formations containing those localities are also considered paleontological resources as they represent a limited, non-renewable resource and once destroyed, cannot be replaced.
Paleontological resources are lithologically dependent; that is, deposition and preservation of paleontological resources are related to the lithologic unit in which they occur. If the rock types representing a deposition environment conducive to deposition and preservation of fossils are not favorable, fossils will not be present. Lithological units that may be fossiliferous include sedimentary formations.

Within San Francisco, geologic conditions associated with the Colma Formation are known to contain fossils. Significant fossils, including mammoth and bison, have been recovered from the Colma Formation. The Colma is known to be between 21 and 28 feet below the ground surface and extends to a depth of 194 feet, where explored. The project site is underlain by fill and sandy to clayey soils within what is known as the Franciscan Complex. Because of the way in which the Franciscan Complex was formed and because no conditions associated with the Colma Formation were encountered, the site is considered to be of low paleontological sensitivity. In addition, as previously discussed, project site excavation would be limited to between 2 and 6 feet for utility connections and the proposed mat foundation and support for the mat foundation system would be provided through ground improvement of the soil, with maximum soil disturbance occurring approximately 17 to 21 feet below grade. Excavation at the project site would not extend to depths associated with the Colma Formation. Because the likelihood of accidental discovery of paleontological resources or unique geological features is small, there would be a less-than-significant impact on unique paleontological resources or geologic features. Therefore, the potential accidental discovery of paleontological resources or unique geologic features during construction would be a less-than-significant impact and no mitigation measures would be required. This topic will not be addressed in the EIR.

Impact C-GE-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulative impact related to geology and soils. (less-than-significant impact)

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The proposed project would result in less-than-significant impacts related to topographical features and risk of injury or death involving landslides. As explained above, impacts related to rupture of an earthquake fault, seismic ground shaking or ground failure, unstable soil, or the loss of topsoil would be less than significant. As explained above, impacts to paleontological resources and geologic features would also be less than significant. Geology and soils impacts are generally site-specific and localized and do not have cumulative effects with other projects. These impacts are specific to the project and would not combine with similar impacts associated with past, present, and reasonably foreseeable future projects in the site vicinity. These impacts would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

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<td>14. HYDROLOGY AND WATER QUALITY— Would the project:</td>
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<td>a) Violate any water quality standards or waste discharge requirements?</td>
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<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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<td>c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion of siltation on- or off-site?</td>
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<td>d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?</td>
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### 14. HYDROLOGY AND WATER QUALITY—Would the project:

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The project is located well inland from both the San Francisco Bay and the Pacific Ocean, and is not subject to seiche or potential inundation in the event of a levee or dam failure or tsunami occurring along the San Francisco coast (maps four, five, and six of the community safety element of the general plan). In addition, the developed area of the project site would not be subject to mudflow. Therefore, Topic 14.j does not apply. The project site is also not located within a 100-year flood hazard area designated on the city’s interim floodplain map, and would not place housing or structures within a 100-year flood hazard area that would impede or redirect flood flows. Therefore, topics 14.g, 14.h, and 14.i are also not applicable.

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Impact HY-1: The proposed project would not violate water quality standards or otherwise substantially degrade water quality. (*less-than-significant impact*)

Wastewater and stormwater flows generated on the project site flow into the city’s combined sewer system and into the Southeast Water Pollution Control Plant, where they are treated prior to discharge into San Francisco Bay. Treatment is undertaken consistent with the effluent discharge standards established by the plant’s National Pollutant Discharge Elimination System (NPDES) permit. In accordance with the permit, discharges of treated wastewater and stormwater into San Francisco Bay meet the requirements of the Clean Water Act, Combined Sewer Overflow Control Policy, and associated state requirements in the Water Quality and Control Plan for the San Francisco Bay Basin and do not violate water quality standards.

The San Francisco Stormwater Design Guidelines, which were adopted by the SFPUC on January 12, 2010, require project applicants proposing development or redevelopment projects disturbing more than 5,000 square feet of ground surface to manage stormwater on site. Based on the stormwater design guidelines, the discharge of stormwater must be reduced to the maximum extent practicable using management practices, control techniques, and system, design, and engineering methods. The proposed project would result in the disturbance of more than 5,000 square feet of ground surface and would therefore be required to comply with the stormwater design guidelines. For residential development such as the proposed project, the stormwater design guidelines recommend the use of features such as permeable paving, cisterns, and bio-retention planters to capture runoff. It is expected that a mixture of these features would be implemented on the project site. These features are categorized under the umbrella of low-impact design (LID), a design method characterized by the use of ecological and landscape-based strategies to manage stormwater. In particular, LID strategies direct runoff to design elements and landscape features that capture, filter, and slow stormwater runoff. Specifically, the proposed project would include a combination of on-grade stormwater planters and permeable paving systems to ensure that stormwater runoff rate and volume is reduced by 25 percent relative to pre-development conditions for the two-year, 24-hour design storm.
Implementation of LID strategies on the project site, in accordance with the stormwater design guidelines, would reduce the amount of stormwater entering the city’s sewer system, reducing the need for treatment, the risk of treatment system overflows (due to capacity limits), and the possibility of flooding due to system overloads. Treatment system overloads and associated flooding also result in degradation of water quality. Therefore, implementation of stormwater design guidelines as part of the proposed project would also reduce impacts to water quality associated with the inability of city infrastructure to adequately capture and treat stormwater during periods of high precipitation, and would aid in meeting city water quality standards. Therefore, the proposed project would not be expected to degrade water quality or violate water quality standards. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

**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 impact)*

The proposed project would reduce the amount of impervious surfaces currently on the project site through implementation of LID and other measures identified in the stormwater design guidelines. Because the proposed project would introduce new pervious open space to the site in the form of the new open courtyard, the project would not adversely affect groundwater recharge (and could incrementally improve recharge). Compliance with requirements of the city’s industrial waste ordinance and implementation of LID and other measures identified in the stormwater design guidelines would ensure that the 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. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

**Impact HY-3: The proposed project would not result in altered drainage patterns that would cause substantial erosion or flooding.** *(less-than-significant impact)*

The project site is covered with impervious surfaces and no streams or creeks occur on the project site. The proposed project would incrementally reduce the amount of impervious surface currently
located on the project site through implementation of LID and other measures identified in the Stormwater Management Ordinance. Surface coverage would not substantially change from existing conditions as part of the proposed project and drainage patterns would remain similar to existing conditions. Therefore, the proposed project would not be expected to result in substantial erosion or flooding associated with changes in drainage patterns. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

Impact HY-4: The proposed project would not contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. (less-than-significant impact)

During operation of the proposed project, all wastewater and stormwater runoff from the project site would be treated at the Southeast Water Pollution Control Plant. Treatment would be provided pursuant to the effluent discharge standards contained in the city’s NPDES permit for the plant. During construction and operation, the proposed project would be required to comply with all local wastewater discharge and water quality requirements including the San Francisco Stormwater Design Guidelines. The stormwater design guidelines would ensure that all stormwater generated by the proposed project is managed on site such that the project would not contribute additional volumes of polluted runoff to the city’s stormwater infrastructure. Therefore, the proposed project would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Thus, this impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

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

As stated above, the proposed project would result in no impacts or less-than-significant impacts related to water quality, groundwater levels, alteration of drainage patterns, capacity of drainage infrastructure, 100-year flood zones, failure of dams or levees, and/or seiche, tsunami, and/or mudflow hazards. The proposed project would adhere to the same water quality and drainage control requirements that apply to all land use development projects in San Francisco. Since all development projects would be required to follow the same drainage, dewatering, and water quality...
regulations, peak stormwater drainage rates and volumes for the design storm would gradually
decrease over time with the implementation of new, conforming development projects. Thus, no
substantial adverse cumulative effects with respect to drainage patterns, water quality, stormwater
runoff, or stormwater capacity of the combined sewer system would occur.

Further, San Francisco’s limited use of groundwater would preclude any significant adverse
cumulative effects to groundwater levels, and the proposed project would not contribute to any
cumulative effects with respect to groundwater. In general, hazards related to 100-year flood zones,
failure of dams or levees, and/or seiche, tsunami, and/or mudflows are extremely unusual and are not
considered to be substantial impacts in San Francisco such that any cumulative significant impacts
would be anticipated, particularly in the interior areas of the city where the project site is located.
Cumulative impacts are not anticipated since all development projects would be required to follow
the same drainage, dewatering, and water quality regulations as the proposed project. Thus, the
proposed project would not combine with past, present, and reasonably foreseeable future projects in
the project vicinity to create significant cumulative hydrology and water quality impacts. This impact
would be less than significant and no mitigation measures would be required. This topic will not be
addressed in the EIR.

### Topics:

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<th>15. HAZARDS AND HAZARDOUS MATERIALS—Would the project:</th>
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<td>a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</td>
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<td>b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?</td>
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The project site is not located within an airport land use plan area or in the vicinity of a private airstrip. Therefore, topics 15.e and 15.f are not applicable.

**Impact HZ-1: The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. (less-than-significant impact)**

Project construction activities would require the use of limited quantities of hazardous materials such as fuels, oils solvents, paints, and other common construction materials. The city would require the project sponsor and its contractor to implement best management practices (BMPs) as part of their construction activities, including hazardous materials management measures, which would reduce the hazards associated with short-term construction-related transport, and use and disposal of hazardous materials to less-than-significant levels.
The proposed project’s residential and commercial uses would involve the use of relatively small quantities of hazardous materials such as cleaners and disinfectants for routine purposes. These products are labeled to inform users of potential risks and to instruct them in appropriate handling procedures. Most of these materials are consumed through use, resulting in relatively little waste. For these reasons, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

Impact HZ-2: The proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable conditions involving the release of hazardous materials into the environment. *(less-than-significant impact)*

Sites known to contain hazardous soils or groundwater conditions in San Francisco are governed by San Francisco Health Code Article 22A, also known as the Maher Ordinance, which is administered and overseen by the San Francisco Department of Public Health (SFDPH). Although the project site is not currently located in a mapped Maher Area, meaning that it is not one of the properties in the area currently mapped by the city as containing or suspected to contain contaminated soils and/or groundwater,\(^\text{108}\) the *phase I environmental site assessment* (site assessment)\(^\text{109}\) conducted at the project site identified two recognized environmental conditions (RECs) including the potential for heavy metal or petroleum hydrocarbon contamination in the fill material and the potential for release of hydraulic fluid and polychlorinated biphenyls (PCBs) to the subsurface due to significant soil and chemical staining within the existing automobile repair area. Thus, the proposed project is subject to compliance with the City’s Maher Ordinance and will be added to the next iteration of the Maher Map Area.


\(^{109}\) Langan Treadwell Rollo, June 14, 2016. *Phase I Environmental Site Assessment, 500 Turk Street, San Francisco, CA 94102.*
The site assessment identified significant soil and chemical staining within the building automobile repair area and hydraulic freight elevator. In addition, the potential for a release of hydraulic fluid and PCBs to the subsurface was identified due to the presence and age of six underground hydraulic hoists located at the project site. The site assessment determined that the site is likely underlain by fill material which commonly contains elevated levels of heavy metals and petroleum hydrocarbons. The sources of these chemicals generally result from past debris from the 1906 earthquake and fire. The *phase II environmental site assessment*[^1] prepared for the proposed project site determined that the upper 2 to 5 feet of soil across half of the site would need to be managed and disposed of as a Class I Non-Federal Resource Conservation and Recovery Act (RCRA) hazardous waste during construction. In addition, another portion of soil would need to be managed as a *Class I* RCRA hazardous waste while the remaining soil at the site could be managed as a *Class II* non-hazardous waste.

The *phase II* site assessment conducted soil vapor tests and detected tetrachloroethylene (PCE) concentrations ranging from 2.1 μg/m³ to 290 μg/m³. PCE concentrations were detected at levels above the residential environmental screening levels (ESLs) of 100 μg/m³ at 290 μg/m³. Chloroform was detected in groundwater at concentrations exceeding the groundwater vapor intrusion ESL for a residential scenario assuming deep groundwater and a sand soil type. The total risk and hazard index for inhalation of VOCs from soil vapor and groundwater for a residential building occupant were identified as de minimis and vapor mitigation was determined unnecessary.

Hazardous concentrations of lead were also detected at the project site and preparation of a site mitigation plan (SMP) and a health and safety plan (HASP) were recommended prior to construction. The SMP would provide recommended measures to mitigate the long-term environmental or health and safety risks caused by the presence of hazardous materials in the soil. The SMP would also contain contingency plans to be implemented during soil excavation if unanticipated hazardous materials are encountered. The HASP would outline proper soil handling procedures and health and

safety requirements to minimize worker and public exposure to hazardous materials during construction.

The *phase I and II* site assessments did not evaluate the potential for the occurrence of asbestos-containing materials (ACMs) and lead-based paint within the existing building, which was constructed in 1935. Given the age of the building, it is likely that these hazardous building materials are present. The California Department of Toxic Substance Control considers asbestos hazardous, and removal of ACMs is required prior to demolition or construction activities that could result in disturbance of these materials. Asbestos-containing materials must be removed in accordance with local and state regulations, BAAQMD, the California Occupational Safety and Health Administration (Cal/OSHA), and California Department of Health Services requirements.

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. The California legislature vests the BAAQMD with the authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and the BAAQMD is to be notified 10 days in advance of any proposed demolition or abatement work. Any asbestos-containing material disturbance at the project site would be subject to the requirements of BAAQMD Regulation 11, Rule 2: Hazardous Materials—Asbestos Demolition, Renovation, and Manufacturing. The local office of Cal/OSHA must also be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow state regulations contained in Title 8 of California Code of Regulations section 1529 and sections 341.6 through 341.14 where there is asbestos-related work involving 100 gross square feet or more of asbestos-containing material. The owner of the property where abatement is to occur must have a hazardous waste generator number assigned by and registered with the Office of the California Department of Health Services. The contractor and hauler of the material are required to file a hazardous waste manifest that details the hauling of the material from the site and the disposal of it. Pursuant to California law, DBI would not issue the required permit until the applicant has complied with the requirements described above. These regulations and procedures already established as part of the building permit review process would ensure that any potential impacts due to asbestos would be reduced to a less-than-significant level.
Work that could result in disturbance of lead paint must comply with section 3426 of the San Francisco Building Code, Work Practices for Lead-Based Paint on Pre-1979 Buildings and Steel Structures. Where there is any work that may disturb or remove lead paint on the exterior of any building built prior to 1979, section 3426 requires specific notification and work standards, and identifies prohibited work methods and penalties.

Section 3426 applies to the exterior of all buildings or steel structures on which original construction was completed prior to 1979 (which are assumed to have lead-based paint on their surfaces, unless demonstrated otherwise through laboratory analysis), and to the interior of residential buildings, hotels, and child care centers. The ordinance contains performance standards, including establishment of containment barriers, at least as effective at protecting human health and the environment as those in the U.S. Department of Housing and Urban Development Guidelines (the most recent guidelines for evaluation and control of lead-based paint hazards) and identifies prohibited practices that may not be used in disturbances or removal of lead-based paint. Any person performing work subject to the ordinance shall, to the maximum extent possible, protect the ground from contamination during exterior work; protect floors and other horizontal surfaces from work debris during interior work; and make all reasonable efforts to prevent migration of lead paint contaminants beyond containment barriers during the course of the work. Clean-up standards require the removal of visible work debris, including the use of a high efficiency particulate air filter (HEPA) vacuum following interior work.

The ordinance also includes notification requirements and requirements for signs. Prior to the commencement of work, the responsible party must provide written notice to the Director of DBI of the address and location of the project; the scope of work, including specific location within the site; methods and tools to be used; the approximate age of the structure; anticipated job start and completion dates for the work; whether the building is residential or nonresidential, owner-occupied or rental property; the dates by which the responsible party has fulfilled or will fulfill any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager number of the party who will perform the work. Further notice requirements include a posted sign notifying the public of restricted access to the work area, a notice to residential occupants, availability of pamphlet related to protection from lead in the home, and notice of early commencement of work.
(by Owner, Requested by Tenant), and notice of lead contaminated dust or soil, if applicable. Section 3426 contains provisions regarding inspection and sampling for compliance by DBI, as well as enforcement, and describes penalties for non-compliance with the requirements of the ordinance.

Demolition would also be subject to the Cal/OSHA Lead in Construction Standard (8 CCR section 1532.1). This standard requires development and implementation of a lead compliance plan when materials containing lead would be disturbed during construction. The plan must describe activities that could emit lead, methods that will be used to comply with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. Cal/OSHA would require 24-hour notification if more than 100 square feet of materials containing lead would be disturbed.

Implementation of procedures required by section 3426 of the Building Code and the lead in construction standard would ensure that potential impacts of demolition or renovation of structures with lead-based paint would be less than significant.

In compliance with the Maher Ordinance, the project sponsor enrolled in SFDPH’s Maher program,\(^\text{111}\) and phase I and phase II site assessments have been prepared to assess the potential for site contamination. Based on mandatory compliance with existing regulatory requirements and the information and conclusions from the phase I and phase II site assessments, the proposed project would not result in a significant hazard to the public or environment from contaminated soil and/or groundwater, asbestos, or lead-based paint, and the proposed project would result in a less-than-significant impact with respect to these hazards and no mitigation would be required. This topic will not be addressed in the EIR.

**Impact HZ-3: The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing school. (less-than-significant impact)**

Tenderloin Community School located at 627 Turk Street, located about 0.1 miles west of the project site, is the only school located within 0.25 miles of the project site. However, as noted above, the proposed project would not result in the storage, handling, or disposal of significant quantities of hazardous materials and would not otherwise include any uses that would result in the emission of hazardous substances. Excavation and demolition activities would comply with applicable regulations governing the removal of potentially contaminated soils and asbestos-containing and lead-based materials. As such, the proposed project would have a less-than-significant impact related to hazardous emissions or the handling of hazardous materials within 0.25 miles of a school and this impact would be less than significant. This topic will not be addressed in the EIR.

Impact HZ-4: The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5, and the proposed project would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (less-than-significant impact)

The provisions in Government Code section 65962.5 are commonly referred to as the Cortese List (after the legislator who authored the legislation that enacted it). The following three state databases include sites in San Francisco: 1) Department of Toxic Substance Control’s database; 2) State Water Resources Control Board’s GeoTracker; and 3) State Water Resources Control Board’s list of “active” sites.

The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5. As previously discussed, the project site is not currently located in the mapped Maher Area; however, due to two RECs on the project site, the proposed project is subject to compliance with the City’s Maher Ordinance (Article 22A) and the project site will be added to the next iteration of the map.

112 Information on the background and history of the Cortese List can be found at: http://www.calepa.ca.gov/sitecleanup/corteselist/Background.htm.
Based on mandatory compliance with existing regulatory requirements and the information and conclusions from the phase I and phase II site assessments, the proposed project would not result in the accidental release of hazardous materials into the environment. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

Impact HZ-5: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and would not expose people or structures to a significant risk of loss, injury, or death involving fires. (less-than-significant impact)

The proposed project would redevelop the project site with residential and retail uses and would not alter the existing street grid. Therefore, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

The city requires that existing and new buildings meet fire safety standards through compliance with the applicable provisions of the San Francisco Building and Fire Codes. In addition, the San Francisco Fire Department and DBI review final building plans of projects containing more than two residential units to ensure code compliance. The proposed project would include 108 residential units and would be subject to compliance with all building code and fire code standards. Therefore, the proposed project’s compliance with building code and fire code requirements would result in a less-than-significant impact related to the exposure of persons or structures to fire risks and no mitigation measure would be required. This topic will not be addressed in the EIR.

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

Hazards-related impacts are generally site-specific and typically do not combine with impacts from other planned and foreseeable projects to result in significant cumulative impacts. New developments in the vicinity of the project site would be subject to the same regulatory requirements as the proposed project. Therefore, large, unexpected releases of hazardous materials of the type that would contribute to significant cumulative impacts are not expected. Compliance with existing regulations pertaining to the treatment and management of hazardous materials would ensure that
the proposed project would not make a significant cumulative contribution to the release of hazardous materials. Therefore, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create significant cumulative hazards impacts. This impact would be less than significant and no mitigation would be required. This topic will not be addressed in the EIR.

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<td>16. MINERAL AND ENERGY RESOURCES—Would the project:</td>
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<td>a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?</td>
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<td>b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?</td>
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<td>c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?</td>
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All land in San Francisco, including the project site, is designated by the California Geological Survey as Mineral Resource Zone Four (MRZ-4) under the Surface Mining and Reclamation Act of 1975. The MRZ-4 designation indicates that adequate information does not exist to assign the area to any other MRZ; thus, the area is not designated to have significant mineral deposits. The project site has previously been developed, and future evaluations of the presence of minerals at this site would therefore not be affected by the proposed project. Further, the development and operation of the proposed project would not have an impact on any off-site operational mineral resource recovery sites. Therefore, Topics 16.a and 16.b are not applicable to the proposed project.

Impact ME-1: The proposed project would not encourage activities which would result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner. (less-than-significant impact)
Development of new residential and commercial uses as part of the proposed project would not result in the consumption of large amounts of fuel, water, or energy. As a new building in San Francisco, the proposed project is required to conform to energy conservation standards specified by the San Francisco Building Code, including the San Francisco Green Building Ordinance. The measures required by the San Francisco Green Building Ordinance are intended to reduce greenhouse gas emissions associated with new construction and rehabilitation activities, increase energy efficiency, reduce water use, and realize other environmental gains. Compliance with the San Francisco Green Building Ordinance would reduce the use of energy and water by the proposed project.

Based on the above information, the proposed project would not result in the consumption of large amounts of fuel, water, or energy. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.

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

As described above, no known mineral resources exist at the project site, and therefore the proposed project would not contribute to any cumulative impacts related to mineral resources. Compliance with current state and local standards regarding energy consumption and conservation, including Title 24 of the California Code of Regulations and the San Francisco Green Building Ordinance, would ensure that the project would not in and of itself require a major expansion of power facilities. Therefore, the energy demand associated with the proposed project would result in a less-than-significant physical environmental effect. The proposed project would not contribute to cumulatively considerable impacts related to energy and natural resources. Overall, the proposed project would not result in cumulatively considerable impacts related to mineral and energy resources. This impact would be less than significant and no mitigation measures would be required. This topic will not be addressed in the EIR.
17. AGRICULTURE AND FOREST RESOURCES

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

—Would the project:

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

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

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

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

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

The project site is located within an urbanized area of San Francisco. No land in San Francisco County has been designated by the California Department of Conservation’s Farmland Mapping and Monitoring Program as agricultural land. The project site does not contain agricultural uses and is not zoned for such uses. Thus, the proposed project would not require the conversion of any land designated as prime farmland, unique farmland, or farmland of statewide importance to non-agricultural use. The proposed project would not conflict with any existing agricultural zoning or Williamson Act contracts, and the California Department of Conservation designates the project site as “Urban and Built-Up Land.” No land in San Francisco is designated as forest land or timberland by the State Public Resource Code. Therefore, the proposed project would not conflict with zoning for
forest land, cause a loss of forest land, or convert forest land to a different use. For these reasons, Topics 17.a, 17.b, 17.c, 17.d, and 17.e are not applicable to the proposed project.

18. MANDATORY FINDINGS OF SIGNIFICANCE—Would the project:

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

(a) As discussed, the proposed project is anticipated to have less-than-significant impacts on the environmental topics identified in this initial study. However, the project could result in potentially significant impacts on historic architectural resources due to the demolition of the existing tire and automobile service building, which is considered to be individually eligible for listing on the CRHR, and therefore a historic resource under CEQA.

(b) The proposed project, in combination with past, present and foreseeable projects as described in Section E, Cumulative Setting, pp. 21–23, would not result in cumulative
impacts to land use, aesthetics, population and housing, transportation and circulation, noise, air quality, wind and shadow, greenhouse gas emissions, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, hazards and hazardous materials, mineral and energy resources, and agricultural and forest resources. However, the proposed project in combination with the past, present and foreseeable projects could result in cumulative impacts to historic architectural resources, and associated plans and policies that protect these resources, which will be further analyzed in the EIR.

(c) The proposed project, as discussed above, would result in less-than-significant direct and indirect adverse impacts on human beings. No further analysis will be required in the EIR.
I. MITIGATION MEASURES AND IMPROVEMENT MEASURES

The following mitigation measures have been identified to reduce potentially significant environmental impacts resulting from the proposed project to less-than-significant levels. In addition, improvement measures have also been agreed to by the project sponsor to further reduce less-than-significant impacts.113

Mitigation Measures

Mitigation Measure M-CP-2: Archeological Testing. Based on a reasonable presumption that archeological resources may be present within the project area, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of an archeological consultant from the rotational Department Qualified Archeological Consultants List (QACL) maintained by the Planning Department archeologist. The project sponsor shall contact the Department archeologist to obtain the names and contact information for the next three archeological consultants on the QACL. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant’s work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level

113 Agreement to Implement Mitigation Measures and Improvement Measures, Case No. 2016-010340ENV, 500 Turk Street, October 5, 2017.
potential effects on a significant archeological resource as defined in CEQA Guidelines section 15064.5(a) and (c).

Consultation with Descendant Communities. On discovery of an archeological site\textsuperscript{114} associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group, an appropriate representative\textsuperscript{115} of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to offer recommendations to the ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Final Archeological Resources Report shall be provided to the representative of the descendant group.

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

\textsuperscript{114} The term “archeological site” is intended here to minimally include any archeological deposit feature, burial, or evidence or burial.

\textsuperscript{115} An “appropriate representative” of the descendant group is here defined to mean, in the case of Native Americans, any individual listed in the current Native American Contact List for the City and County of San Francisco maintained by the California Native American Heritage Commission and in the case of the Overseas Chinese, the Chinese Historical Society of America. An appropriate representative of other descendant groups should be determined in consultation with the Department archeologist.
At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the ERO. If based on the archeological testing program the archeological consultant finds that significant archeological resources may be present, the ERO in consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or an archeological data recovery program. No archeological data recovery shall be undertaken without the prior approval of the ERO or the Planning Department archeologist. If the ERO determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

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

B. A data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

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

- The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils- disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, site remediation, etc., shall require archeological monitoring because of the risk these activities pose to potential archeological resources and to their depositional context;
The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;

- The archeological monitor(s) shall be present on the project area according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;

- The archeological monitor shall record and be authorized to collect soil samples and artefactual/ecofactual material as warranted for analysis;

- If an intact archeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/construction activities and equipment until the deposit is evaluated. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO.

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

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

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

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

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

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, one unbound and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

**Mitigation Measure M-NO-3: Construction Noise Reduction.** The project sponsor shall designate a point of contact to respond to any noise complaints and the following practices shall be incorporated into the construction contract agreement documents to be implemented by the project contractor (Contractor) during construction of the project:

- Conduct noise monitoring at the beginning of major construction phases (e.g., demolition, excavation) to determine the need and the effectiveness of noise-attenuation measures. If needed, measures shall include plywood barriers, suspended construction blankets, or other screening devices to break line of sight to noise-sensitive receptors.

- Post signs on site pertaining to permitted construction days and hours, complaint procedures, and who to notify in the event of a problem, with telephone numbers listed.
• Notify the Department of Building Inspection (DBI) and neighbors in advance of the schedule for each major phase of construction and expected loud activities.

• When feasible, select "quiet" construction methods and equipment (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds).

• Require that all construction equipment be in good working order and mufflers be inspected to confirm that they are functioning properly. Avoid unnecessary idling of equipment and engines.

• Locate stationary equipment, material stockpiles, and vehicle staging areas as far as practicable from all identified sensitive receptors. To the extent feasible, avoid placing stationary noise generating equipment (e.g., generators, compressors) within noise-sensitive buffer areas (measured at 20 feet) from immediately-adjacent neighbors.

• Impact tools (e.g., jack hammers, pavement breakers, and rock drills) that are used for construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used, along with external noise jackets on the tools, where feasible.

• Per the San Francisco Noise Ordinance (Police Code Article 29), "noisy" construction activity shall be limited to the hours of 7 a.m. to 8 p.m. Noisy construction outside of these hours shall be approved through a development permit based on a site-specific construction noise mitigation plan and a finding by DBI that the construction noise mitigation plan is adequate to prevent noise disturbance of potentially affected residential uses.

Mitigation Measure M-AQ-2: Construction Air Quality. The project sponsor or the project sponsor’s contractor shall comply with the following:

Engine Requirements:

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

- Where access to alternative sources of power are available, portable diesel engines shall be prohibited.
- Diesel engines, whether for off-road or on-road equipment, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions). The contractor shall post legible and visible signs in English, Spanish, and Chinese, in designated queuing areas and at the construction site to remind operators of the two minute idling limit.
- The contractor shall instruct construction workers and equipment operators on the maintenance and tuning of construction equipment, and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications.

Waivers:

- The San Francisco Planning Department Environmental Review Officer or designee (ERO) may waive the alternative source of power requirement above if an alternative source of power is limited or infeasible at the project site. If the ERO grants the waiver, the contractor must submit documentation that the equipment used for onsite power generation meets the engine requirements above.
- The ERO may waive the equipment requirements of above if: a particular piece of off-road equipment with an ARB Level 3 VDECS is technically not feasible; the equipment would not produce desired emissions reduction due to expected operating modes; installation of the equipment would create a safety hazard or impaired visibility for the operator; or, there is a compelling emergency need to use off-road equipment that is not retrofitted with an ARB Level 3 VDECS. If the ERO grants the waiver, the contractor must use the next cleanest piece of off-road equipment, according to Table M-AQ-2, below.
Table M-AQ-2: Off-Road Equipment Compliance Step-Down Schedule

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

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

** Alternative fuels are not a VDECS.

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

- The Plan shall include estimates of the construction timeline by phase, with a description of each piece of off-road equipment required for every construction phase. The description may include, but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For VDECS installed, the description may include: technology type, serial number, make, model, manufacturer, ARB verification number level, and installation date and hour meter reading on installation date. For off-road equipment using alternative fuels, the description shall also specify the type of alternative fuel being used.

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

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

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

Improvement Measures

Improvement Measure I-TR-1: Construction Management Plan and Public Updates. The project sponsor or the project sponsor’s contractor should comply with the following:

Construction Coordination: To reduce potential conflicts between construction activities and pedestrians, bicyclists, transit and vehicles at the project site, the project sponsor should require that the contractor prepare a Construction Management Plan for the project construction period. The preparation of a Construction Management Plan could be a requirement included in the construction bid package. Prior to finalizing the Plan, the project sponsor/ construction contractor(s) should meet with San Francisco Public Works (Public Works), SFMTA, the Fire Department, Muni Operations and other City agencies to coordinate feasible measures to include in the Construction Management Plan to reduce traffic congestion, including measures to reduce potential traffic, bicycle, and transit disruption and pedestrian circulation effects during construction of the proposed project. This review should consider other ongoing construction in the project vicinity.

Carpool, Bicycle, Walk and Transit Access for Construction Workers: To minimize parking demand and vehicle trips associated with construction workers, the construction contractor could include as part of the Construction Management Plan methods to encourage carpooling, bicycle, walk and transit access to the project site by construction workers (such as providing transit subsidies to construction workers, providing secure bicycle parking spaces,
participating in free-to-employee ride matching program from www.511.org, participating in emergency ride home program through the City of San Francisco (www.sferh.org), and providing transit information to construction workers.

Construction Worker Parking Plan: As part of the Construction Management Plan that could be developed by the construction contractor, the location of construction worker parking could be identified as well as the person(s) responsible for monitoring the implementation of the proposed parking plan. The use of on-street parking to accommodate construction worker parking could be discouraged. All construction bid documents could include a requirement for the construction contractor to identify the proposed location of construction worker parking. If on-site, the location, number of parking spaces, and area where vehicles would enter and exit the site could be required. If off-site parking is proposed to accommodate construction workers, the location of the off-site facility, number of parking spaces retained, and description of how workers would travel between an off-site facility and the project site could be required.

Project Construction Updates for Adjacent Businesses and Residents: To minimize construction impacts on access to nearby institutions and businesses, the project sponsor could provide nearby residences and adjacent businesses with regularly-updated information regarding project construction, including construction activities, peak construction vehicle activities (e.g., concrete pours), travel lane closures, and parking lane and sidewalk closures. A regular email notice could be distributed by the project sponsor that would provide current construction information of interest to neighbors, as well as contact information for specific construction inquiries or concerns.
J. PUBLIC NOTICE AND COMMENT

Concurrently with this initial study, the San Francisco Planning Department has issued a notice of preparation (NOP) of an environmental impact report for the 500 Turk 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 review and comment period. Comments received on the NOP/Initial Study will be considered in preparation of the EIR analysis.
K. DETERMINATION

On the basis of this initial study:

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

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

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

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

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

Lisa Gibson
Environmental Review Officer
for
John Rahaim
Director of Planning

DATE 10/11/17
L. INITIAL STUDY PREPARERS

REPORT AUTHORS

Planning Department, City and County of San Francisco
Environmental Planning Division
1650 Mission Street, Suite 400
San Francisco, CA 94103
   Environmental Review Officer: Lisa Gibson
   Senior Environmental Planner: Joy Navarrete
   Environmental Planner: Jeanie Poling
   Preservation Planner: Jorgen Cleemann

ENVIRONMENTAL CONSULTANTS

LSA Associates, Inc.
2215 Fifth Street
Berkeley, CA 94701
   Principal-in-Charge/Project Manager: Theresa Wallace, AICP
   Planner: Matt Kawashima
   Air Quality/Noise Specialist: Amy Fischer
   Air Quality/Planner: Cara Carlucci
   Support Staff: Patty Linder, Charis Hanshaw

PROJECT SPONSOR

Tenderloin Neighborhood Development Corporation
201 Eddy Street
San Francisco, CA 94102
   Project Sponsor: Daniel Findley

Coblentz Patch Duffy & Bass LLP
One Montgomery Street, Suite 3000
San Francisco, CA 94104
   Project Attorneys: Caroline Guibert Chase and Tay Via

David Baker Architects
461 Second Street #2
San Francisco, CA 94107
   Project Architect: Katie Ackerly, LEED, AP, CPHC
   Designer: Won Young Kim