

DEIR



# DRAFT ENVIRONMENTAL IMPACT REPORT

## 500 Turk Street Project

PLANNING DEPARTMENT  
CASE NO. 2016-010340ENV

STATE CLEARINGHOUSE NO. 2017102039



SAN FRANCISCO  
**PLANNING**  
DEPARTMENT

Draft EIR Publication Date:	NOVEMBER 22, 2017
Draft EIR Public Hearing Date:	JANUARY 11, 2018
Draft EIR Public Comment Period:	NOVEMBER 22, 2017 - JANUARY 16, 2018

*Written comments should be sent to:*

Jeanie Poling, Environmental Planner | 1650 Mission Street, Suite 400 | San Francisco, CA 94103  
or [jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org)



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# SAN FRANCISCO PLANNING DEPARTMENT

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**DATE:** November 22, 2017  
**TO:** Distribution List for the 500 Turk Street Project Draft EIR  
**FROM:** Lisa M. Gibson, Environmental Review Officer  
**SUBJECT:** Request for the Final Environmental Impact Report for the 500 Turk Street Project (Planning Department File No. 2016-010340ENV)

1650 Mission St.  
Suite 400  
San Francisco,  
CA 94103-2479

Reception:  
**415.558.6378**

Fax:  
**415.558.6409**

Planning  
Information:  
**415.558.6377**

This is the draft of the environmental impact report (EIR) for the 500 Turk Street Project. A public hearing will be held on the adequacy and accuracy of this document. After the public hearing, our office will prepare and publish a document titled "Responses to Comments," which will contain a summary of all relevant comments on this draft EIR and our responses to those comments. It may also specify changes to this draft EIR. Those who testify at the hearing on the draft EIR will automatically receive a copy of the responses to comments document, along with notice of the date reserved for certification; others may receive a copy of the responses to comments and notice by request or by visiting our office. This draft EIR together with the responses to comments document will be considered by the planning commission in an advertised public meeting and will be certified as a final EIR if deemed adequate.

After certification, we will modify the draft EIR as specified by the responses to comments document and print both documents in a single publication called the final EIR. The final EIR will add no new information to the combination of the two documents except to reproduce the certification resolution. It will simply provide the information in one document, rather than two. Therefore, if you receive a copy of the responses to comments document in addition to this copy of the draft EIR, you will technically have a copy of the final EIR.

We are aware that many people who receive the draft EIR and responses to comments have no interest in receiving virtually the same information after the EIR has been certified. To avoid expending money and paper needlessly, we would like to send copies of the final EIR in Adobe Acrobat format on a CD to private individuals only if they request them. Therefore, if you would like a copy of the final EIR, please fill out and mail the postcard provided inside the back cover to the environmental planning division of the planning department within two weeks after certification of the EIR. Any private party not requesting a final EIR by that time will not be mailed a copy. Public agencies on the distribution list will automatically receive a copy of the final EIR.

Thank you for your interest in this project.



# TABLE OF CONTENTS

S.	SUMMARY .....	S-1
	INTRODUCTION .....	S-1
	PROJECT SUMMARY .....	S-1
	SUMMARY OF IMPACTS AND MITIGATION MEASURES.....	S-2
	SUMMARY OF ALTERNATIVES .....	S-4
	ENVIRONMENTALLY SUPERIOR ALTERNATIVE .....	S-37
	AREAS OF KNOWN CONTROVERSY AND ISSUES TO BE RESOLVED.....	S-38
I.	INTRODUCTION .....	1
	PROJECT SUMMARY .....	1
	PURPOSE OF THE EIR .....	1
	ENVIRONMENTAL REVIEW PROCESS .....	4
	ORGANIZATION OF THE DRAFT EIR .....	9
II.	PROJECT DESCRIPTION .....	11
	PROJECT OVERVIEW .....	11
	PROJECT SPONSOR'S OBJECTIVES.....	12
	PROJECT SITE.....	13
	PROPOSED PROJECT.....	18
	PROJECT APPROVALS.....	29
III.	PLANS AND POLICIES .....	33
	SAN FRANCISCO GENERAL PLAN.....	35
	SAN FRANCISCO PLANNING CODE.....	36
	ACCOUNTABLE PLANNING INITIATIVE .....	40
	SUMMARY .....	41
IV.	ENVIRONMENTAL SETTING AND IMPACTS .....	43
	A. HISTORIC ARCHITECTURAL RESOURCES .....	51
V.	OTHER CEQA ISSUES .....	97
	GROWTH INDUCEMENT.....	97
	SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD RESULT IF THE PROPOSED PROJECT IS IMPLEMENTED.....	98
	SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS.....	100
	AREAS OF KNOWN CONTROVERSY AND ISSUES TO BE RESOLVED.....	101
	SUMMARY .....	102

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VI.	ALTERNATIVES .....	103
	SUMMARY OF PROJECT ALTERNATIVES .....	105
	NO PROJECT ALTERNATIVE .....	108
	FULL PRESERVATION ALTERNATIVE.....	109
	PARTIAL PRESERVATION ALTERNATIVE .....	119
	ENVIRONMENTALLY SUPERIOR ALTERNATIVE .....	129
	ALTERNATIVES CONSIDERED BUT REJECTED .....	130
VII.	REPORT PREPARERS.....	133
	REPORT AUTHORS.....	133
	ENVIRONMENTAL CONSULTANTS.....	133
	PROJECT SPONSOR .....	133
	SPONSOR’S ATTORNEY .....	133
	ARCHITECT.....	134

**APPENDICES**

Appendix A: Notice of Preparation and Initial Study

## FIGURES

Figure II-1:	Project Location and Regional Vicinity Map .....	14
Figure II-2:	Aerial Photograph of Project Site and Surrounding Land Uses .....	15
Figure II-3:	Existing Site Conditions .....	16
Figure II-4:	Conceptual Ground Floor Plan .....	19
Figure II-5:	Conceptual Upper Floor Plan.....	20
Figure II-6:	Conceptual Roof Plan .....	21
Figure II-7a:	Conceptual Building Elevations.....	22
Figure II-7b:	Conceptual Building Elevations.....	23
Figure II-8:	Circulation and Parking Plan .....	27
Figure IV-1:	Cumulative Projects Map .....	50
Figure IV.A-1:	500 Turk Street Building – Looking Northwest at the Turk and Larkin street Intersection .....	55
Figure VI-1:	Full Preservation Site Plan .....	111
Figure VI-2:	Full Preservation Conceptual Ground Floor Plan .....	115
Figure VI-3:	Full Preservation Conceptual Upper Floor Plan.....	116
Figure VI-4a:	Full Preservation Conceptual Building Elevations.....	117
Figure VI-4b:	Full Preservation Conceptual Building Elevations.....	118
Figure VI-5:	Partial Preservation Site Plan.....	121
Figure VI-6:	Partial Preservation Conceptual Ground Floor Plan.....	122
Figure VI-7:	Partial Preservation Conceptual Upper Floor Plan .....	123
Figure VI-8a:	Partial Preservation Conceptual Building Elevations .....	124
Figure VI-8b:	Partial Preservation Conceptual Building Elevations .....	125

## TABLES

Table S-1:	Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the EIR.....	5
Table S-2:	Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study.....	10
Table S-3:	Comparison of Characteristics and Significant Impacts of the Proposed Project with EIR Alternatives .....	35
Table II-1:	Proposed Project Details.....	18
Table IV-1:	Cumulative Projects in the Project Vicinity .....	49
Table VI-1:	Comparison of Characteristics and Significant Impacts of the Proposed Project with EIR Alternatives .....	106

## ACRONYMS AND ABBREVIATIONS

2010 Survey	Van Ness Auto Row Support Structures Survey
2017 HRE	2017 500 Turk Street – Historic Resource Evaluation, Part 2 – Alternatives Analysis
2017 HRER	2017 Historic Resource Evaluation Response
ABAG	Association of Bay Area Governments
AMI	Area Median Income
BART	Bay Area Rapid Transit
BRT	Van Ness Bus Rapid Transit
CEQA	California Environmental Quality Act
CRHR	California Register of Historic Resources
DBI	Department of Building Inspection
EIR	Environmental Impact Report
FTA	Federal Transit Administration
general plan	San Francisco General Plan
HABS	Historic American Building Survey
HUD	U.S. Department of Housing and Urban Development
in/sec	inches per second
LTS	Less than significant impact
MMRP	Mitigation Monitoring and Reporting Program
Muni	San Francisco Municipal Railway
NOP/IS	Notice of Preparation/Initial Study
NRHP	National Register of Historic Places
Planning Code	San Francisco Planning Code
planning department	San Francisco Planning Department
PPV	peak particle velocity
RC-4	Residential-Commercial-Combined, High Density District
SFMTA	San Francisco Municipal Transportation Agency
SFPH	San Francisco Department of Public Health
SFPUC	San Francisco Public Utilities Commission
SFPW	San Francisco Public Works
SRO	single-room occupancy
SUM	Significant and unavoidable impact with mitigation

# SUMMARY

## INTRODUCTION

This document is a draft environmental impact report (EIR) for the proposed 500 Turk Street Project (project). This chapter of the EIR provides a summary of the project, a summary of anticipated environmental impacts of the project and identified mitigation measures; areas of controversy to be resolved; a summary of alternatives; and an identification of the environmentally superior alternative. The project sponsor, Tenderloin Neighborhood Development Corporation, a non-profit affordable housing developer, proposes to redevelop an approximately 18,906-square-foot (0.43-acre) parcel located at 500 Turk Street in San Francisco's Tenderloin neighborhood.

## PROJECT SUMMARY

The proposed project would result in the development of the project site with residential and ground-floor commercial uses. 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 affordable 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 23 studio units, 21 one-bedroom units, 50 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). One unit would be provided for the on-site building manager.

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 San Francisco Planning Code (planning code). Chapter II, Project Description, pp. 11–32, provides a detailed description of the proposed project.

## SUMMARY OF IMPACTS AND MITIGATION MEASURES

This EIR analyzes the potential environmental effects of the proposed project, as identified in the notice of preparation (NOP) of an EIR, issued October 11, 2017 (Appendix A of this EIR). The initial study (IS) attached to the NOP (also included in Appendix A) found that the proposed project could have potentially significant environmental effects related to historic architectural resources. Impacts in the following areas would be less than significant (some with the mitigation measures identified in the NOP/IS) and are not further evaluated in this EIR: land use and land use planning; population and housing; archeological and tribal resources; transportation and circulation; noise; air quality; greenhouse gas emissions; wind and shadow; recreation; utilities and service systems; public services; biological resources; geology and soils; hydrology and water quality; hazards and hazardous materials; mineral and energy resources; and agriculture and forest resources.

This summary provides an overview of the analysis contained in Chapter IV, Environmental Setting and Impacts, pp.43–96. Impacts are categorized by type of impact as follows:

- *No Impact.* No adverse changes (or impacts) to the environment are expected.
- *Less Than Significant.* An impact that would not involve an adverse physical change to the environment, does not exceed the defined significance criteria, or would be eliminated or reduced to a less-than-significant level through compliance with existing local, state, and federal laws and regulations.
- *Less Than Significant with Mitigation.* An impact that is reduced to a less-than-significant level through implementation of the identified mitigation measure.
- *Significant and Unavoidable with Mitigation.* An adverse physical environmental impact that exceeds the defined significance criteria and can be reduced through compliance with existing local, state, and federal laws and regulations and/or implementation of all feasible mitigation measures, but cannot be reduced to a less-than-significant level.

- *Significant and Unavoidable*. An adverse physical environmental impact that exceeds the defined significance criteria and cannot be eliminated or reduced to a less-than-significant level through compliance with existing local, state, and federal laws and regulations and for which there are no feasible mitigation measures.

As identified in Section IV.A, Historic Architectural Resources, pp. 51–96, under **Impact CP-1**, demolition of the 500 Turk Street building under the proposed project would result in a significant and unavoidable impact to the individual historic architectural resource at 500 Turk Street, which is identified as a historic resource under CEQA. Implementation of **Mitigation Measures M-CR-1a: Documentation**, **M-CR-1b: Interpretive Display**, and **M-CR-1c: Salvage** would reduce this adverse impact on the historic resource, but not to a less-than-significant level. There is no feasible mitigation measure that could avoid this project-related historic architectural resource impact. Therefore, the impact to the historic resource on the project site would remain significant and unavoidable.

As identified in Section IV.A, Historic Architectural Resources, pp. 51–96, under **Impact C-CR-1**, demolition of the 500 Turk Street building, in combination with other past, present, and reasonably foreseeable future projects in the project vicinity (within 0.25 miles of the project site), would result in a significant cumulative impact on commercial buildings constructed in the aftermath of the 1906 earthquake and fire, and the project’s contribution to the significant cumulative impact would be cumulatively considerable. Implementation of **Mitigation Measures M-CR-1a: Documentation**, **M-CR-1b: Interpretive Display**, and **M-CR-1c: Salvage** would reduce the adverse effect of the proposed project on these historic resources, but not to a less-than-significant level.

**Table S-1** identifies the impacts and mitigation measures for the proposed project that are identified in this EIR. **Table S-2** identifies the impacts and mitigation measures for the proposed project that are identified in the NOP/IS included as Appendix A. The information in the tables is organized to correspond with environmental issues discussed in Chapter IV and the NOP/IS. The table is arranged in four columns: (1) impacts; (2) level of significance prior to mitigation measures (if applicable); (3) mitigation measures (if applicable); and (4) level of significance after mitigation (if applicable). For

a complete description of potential impacts and recommended mitigation measures, please refer to the topical sections in Chapter IV and in the NOP/IS.

## SUMMARY OF ALTERNATIVES

The following three alternatives to the projects are considered in this EIR, and are further detailed in Chapter VI, Alternatives:

- The **No Project Alternative**, under which the project site would not be redeveloped with the proposed project and the project site would remain in its existing condition.
- The **Full Preservation Alternative**, under which the existing building would be retained in its entirety with a new one-story addition on the Turk Street Wing and a new seven-story building would be constructed in the open portion of the lot to the north. A total of 32 residential units and approximately 4,079 square feet of commercial space would be developed.
- The **Partial Preservation Alternative**, under which portions of the existing building would be retained and new seven-story building would be constructed in the open portion of the lot to the north, with five- to six-story rooftop additions over the existing Larkin and Turk street Wings. A total of 56 residential units and approximately 2,850 square feet of commercial space would be developed.

A comparison of the development program and impacts identified for the proposed project and project alternatives is included in **Table S-3**.

**Table S-1: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the EIR**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
<b>A. Historic Architectural Resources</b>			
<p>CR-1: The proposed project would cause a substantial adverse change in the significance of the Kahn and Keville Building located at 500 Turk Street, a historic resource as defined by CEQA Guidelines section 15064.5(b).</p>	Significant	<p><u>Mitigation Measure M-CR-1a: Documentation</u>. Prior to the issuance of demolition or site permits, the project sponsor shall undertake Historic American Building Survey (HABS)-level documentation of the subject property, structures, objects, materials, and landscaping. The documentation shall be funded by the project sponsor and undertaken by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate), as set forth by the Secretary of the Interior's Professional Qualification Standards (36 CFR, Part 61). The professional overseeing the documentation shall meet with the planning department staff for review and approval of a coordinated documentation plan before work on any one aspect may commence. The documentation shall consist of the following:</p> <ul style="list-style-type: none"> <li><i>Measured Drawings</i>: A set of measured drawings that depict the existing size, scale, and dimension of the subject property. The planning department preservation staff will accept the original architectural drawings or an as-built set of architectural drawings (plan, section, elevation, etc.). The planning department preservation staff will assist the consultant in determining the appropriate level of measured drawings;</li> </ul>	Significant and Unavoidable

**Table S-1: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the EIR**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
Mitigation Measure M-CR-1a <i>Continued</i>		<ul style="list-style-type: none"> <li>• <i>HABS-Level Photography</i>: Digital photographs of the interior and the exterior of subject property. Large format negatives are not required. The scope of the digital photographs shall be reviewed by planning department preservation staff for concurrence, and all digital photography shall be conducted according to current National Park Service Standards. The photography shall be undertaken by a qualified professional with demonstrated experience in HABS photography; and</li> <li>• <i>HABS Historical Report</i>: A written historical narrative and report, per HABS Historical Report Guidelines.</li> <li>• <i>Video Recordation of the Historic Resource</i>: Digital video recordation shall be undertaken prior to the issuance of demolition or site permits. The project sponsor shall undertake video documentation of the affected historic resource and its setting. The video recordation will be scoped with and approved by planning department preservation staff prior to issuance of a site permit. The documentation shall be conducted and narrated by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate) set forth by the Secretary of the Interior's Professional Qualification Standards (36 Code of Federal Regulations, Part 61). The documentation shall include as much information as possible-using visuals in combination with narration-about the materials, construction methods, current condition, historic use, and historic context of the historic resource.</li> </ul>	

**Table S-1: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the EIR**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
Mitigation Measure M-CR-1a <i>Continued</i>		<p>The professional(s) shall prepare the documentation and the planning department shall monitor its preparation. The professional(s) shall submit the completed documentation for review and approval by a planning department preservation staff before issuance of building permits. The final approved documentation shall be provided to the planning department and offered to repositories including, but not limited to, the San Francisco Public Library, the Environmental Design Library at the University of California, Berkeley, the Northwest Information Center, San Francisco Architectural Heritage, and the California Historical Society.</p> <p>Further, a softcover book shall be produced that includes the content from the historical report, historical photographs, HABS photography, and measured drawings. The book shall be made available to the public for distribution.</p> <p><u>Mitigation Measure M-CR-1b: Interpretive Display.</u> The project sponsor shall provide a permanent display concerning the history of the Kahn and Keville building at 500 Turk Street and the historical context of automotive-related businesses along Van Ness Avenue and adjacent side streets. Interpretation of the building's history shall be supervised by an architectural historian who meets the Secretary of the Interior's Professional Qualification Standards. The interpretative materials (which may include, but are not limited to, a commemorative marker or plaque, a display of photographs, and/or news articles) shall be placed in a publicly accessible location on the project site. The interpretive display required by this mitigation measure shall refer the public to the video presentation required under Mitigation Measure M-CR 1a.</p>	

**Table S-1: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the EIR**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
Mitigation Measure M-CR-1b <i>Continued</i>		<p>The interpretive material(s) shall be installed within the project site boundaries and made of durable all-weather materials. The interpretive material(s) shall be of high quality and installed to allow for high public visibility. The content, materials, and appearance of the interpretive material(s) shall be developed by a consultant experienced in urban architectural interpretive displays, and shall be done in consultation with planning department preservation staff.</p> <p>A proposal describing the general parameters of the interpretive program shall be approved by planning department preservation staff prior to issuance of a site permit. The substance, media, and other characteristics of such interpretive display shall be approved by planning department preservation staff prior to issuance of a final certificate of occupancy</p> <p><u>Mitigation Measure M-CR-1c: Salvage.</u> The sponsor shall make an effort to incorporate the subject property's character-defining historical signage into the architecture of the new building that will be constructed on the site. If this proves infeasible or otherwise undesirable, the sponsor shall attempt to donate the historical signage to a historical organization</p>	
CR-2: The construction of the proposed new building on the project site would not have a substantial adverse effect on any identified or potential off-site historic resources as defined in CEQA Guidelines section 15064.5 in the vicinity of the project site.	Less Than Significant	None required	N/A



**Table S-1: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the EIR**

<b>Environmental Impacts</b>	<b>Level of Significance Without Mitigation</b>	<b>Mitigation/Improvement Measures</b>	<b>Level of Significance With Mitigation</b>
C-CR-1: The proposed project, in combination with other past, present and reasonably foreseeable future projects in the project vicinity, could result in a cumulatively considerable contribution to a significant cumulative impact on a historic architectural resource.	Significant	Implement Mitigation Measures M-CR-1a through M-CR-1c.	Significant and Unavoidable

Source: LSA, 2017.

**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

<b>Environmental Impacts</b>	<b>Level of Significance Without Mitigation</b>	<b>Mitigation/Improvement Measures</b>	<b>Level of Significance With Mitigation</b>
<b>Land Use and Land Use Planning</b>			
LU-1: The proposed project would not physically divide an established community.	Less Than Significant	None required	N/A
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	None required	N/A
C-LU-1: The proposed project would not create a considerable contribution to cumulative significant land use impacts.	Less Than Significant	None required	N/A
<b>Population and Housing</b>			
PH-1: The proposed project would not directly or indirectly induce substantial population growth in San Francisco.	Less Than Significant	None required	N/A
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	None required	N/A
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	None required	N/A
<b>Cultural Resources</b>			
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	See Table S-1	N/A

**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
CP-2: The proposed project could result in a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5 and human remains.	Significant	<p><b>Mitigation Measure M-CP-2: Archeological Testing</b></p> <p>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).</p>	Less Than Significant

**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
Mitigation Measure M-CP-2 <i>Continued</i>		<p><i>Consultation with Descendant Communities.</i> On discovery of an archeological site associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group, an appropriate representative 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.</p> <p><i>Archeological Testing Program.</i> 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.</p>	

**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
Mitigation Measure M-CP-2 <i>Continued</i>		<p>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:</p> <p>A. The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or</p> <p>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.</p>	

**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
Mitigation Measure M-CP-2 <i>Continued</i>		<p><i>Archeological Monitoring Program.</i> 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:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> </ul>	

**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
Mitigation Measure M-CP-2 <i>Continued</i>		<ul style="list-style-type: none"> <li>• The archeological monitor shall record and be authorized to collect soil samples and artefactual/ecofactual material as warranted for analysis;</li> <li>• 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.</li> </ul> <p>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.</p> <p><i>Archeological Data Recovery Program.</i> 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.</p>	



**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
Mitigation Measure M-CP-2 <i>Continued</i>		<p>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:</p> <ul style="list-style-type: none"> <li>• <i>Field Methods and Procedures</i>-Descriptions of proposed field strategies, procedures, and operations.</li> <li>• <i>Cataloguing and Laboratory Analysis</i>-Description of selected cataloguing system and artifact analysis procedures.</li> <li>• <i>Discard and Deaccession Policy</i>-Description of and rationale for field and post-field discard and deaccession policies.</li> <li>• <i>Interpretive Program</i>-Consideration of an on-site/off-site public interpretive program during the course of the archeological data recovery program.</li> <li>• <i>Security Measures</i>-Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities.</li> <li>• <i>Final Report</i>-Description of proposed report format and distribution of results.</li> <li>• <i>Curation</i>-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.</li> </ul>	

**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
Mitigation Measure M-CP-2 <i>Continued</i>		<p><i>Human Remains and Associated or Unassociated Funerary Objects.</i> 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.</p> <p><i>Final Archeological Resources Report.</i> 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.</p>	

**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
Mitigation Measure M-CP-2 <i>Continued</i>		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.	
CP-3: Construction activities for the proposed project would not result in the disturbance of tribal resources.	Less Than Significant	None required	N/A
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	See Table S-1	N/A
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.	Significant	Implement Mitigation Measure M-CP-2: Archeological Testing	Less Than Significant

**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
<b>Transportation and Circulation</b>			
<p>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.</p>	Less Than Significant	<p><b>Improvement Measure I-TR-1: Construction Management Plan and Public Updates.</b> The project sponsor or the project sponsor's contractor should comply with the following:</p> <p><i>Construction Coordination:</i> 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.</p>	N/A

**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
Improvement Measure I-TR-1: <i>Continued</i>		<p><i>Carpool, Bicycle, Walk and Transit Access for Construction Workers:</i> 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 <a href="http://www.511.org">www.511.org</a>, participating in emergency ride home program through the City of San Francisco (<a href="http://www.sferh.org">www.sferh.org</a>), and providing transit information to construction workers.</p> <p><i>Construction Worker Parking Plan:</i> 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.</p>	

**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
Improvement Measure I-TR-1: <i>Continued</i>		<i>Project Construction Updates for Adjacent Businesses and Residents:</i> 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.	
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	None required	N/A
TR-3: The proposed project would not result in inadequate emergency access.	Less Than Significant	None required	N/A
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	None required	N/A
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	None required	N/A
<b>Noise</b>			
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	None required	N/A

**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
NO-2: The proposed project would not expose people to excessive groundborne vibration or groundborne noise levels.	Less Than Significant	None required.	N/A
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.	Significant	<p><b>Mitigation Measure M-NO-3: Construction Noise Reduction.</b> 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:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Notify the Department of Building Inspection (DBI) and neighbors in advance of the schedule for each major phase of construction and expected loud activities.</li> <li>• 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).</li> <li>• 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.</li> </ul>	Less Than Significant



**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
Mitigation Measure M-NO-3 <i>Continued</i>		<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>	
NO-4: The proposed project would not be substantially affected by existing noise levels.	Less Than Significant	None required	N/A
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	None required	N/A

Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
<b>Air Quality</b>			
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	None required	N/A
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.	Significant	<p><b>Mitigation Measure M-AQ-2: Construction Air Quality.</b> The project sponsor or the project sponsor's contractor shall comply with the following:</p> <p><i>Engine Requirements:</i></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Where access to alternative sources of power are available, portable diesel engines shall be prohibited.</li> <li>• 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.</li> </ul>	Less Than Significant

**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
Mitigation Measure M-AQ-2 <i>Continued</i>		<ul style="list-style-type: none"> <li>• 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.</li> </ul> <p><i>Waivers:</i></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>	

**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation												
Mitigation Measure M-AQ-2 <i>Continued</i>		<p><b>Table M-AQ-2: Off-Road Equipment Compliance Step-Down Schedule</b></p> <table border="1" data-bbox="1073 477 1715 643"> <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> <p>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.</p> <p>** Alternative fuels are not a VDECS.</p> <p><i>Construction Emissions Minimization Plan.</i> 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.</p> <ul style="list-style-type: none"> <li>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.</li> </ul>	Compliance Alternative	Engine Emission Standard	Emissions Control	1	Tier 2	ARB Level 2 VDECS	2	Tier 2	ARB Level 1 VDECS	3	Tier 2	Alternative Fuel*	
Compliance Alternative	Engine Emission Standard	Emissions Control													
1	Tier 2	ARB Level 2 VDECS													
2	Tier 2	ARB Level 1 VDECS													
3	Tier 2	Alternative Fuel*													

**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measures	Level of Significance With Mitigation
Mitigation Measure M-AQ-2 <i>Continued</i>		<p>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.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• <i>Monitoring.</i> 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.</li> </ul>	

**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

<b>Environmental Impacts</b>	<b>Level of Significance Without Mitigation</b>	<b>Mitigation/Improvement Measures</b>	<b>Level of Significance With Mitigation</b>
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.	Less Than Significant	None required	N/A
AQ-4: Implementation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations.	Less Than Significant	None required	N/A
AQ-5: Implementation of the proposed project would not conflict with or obstruct implementation of the local applicable air quality plan.	Less Than Significant	None required	N/A
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	None required	N/A
AQ-7: Implementation of the proposed project would not create objectionable odors affecting a substantial number of people.	Less Than Significant	None required	N/A
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.	Significant	Implement Mitigation Measure M-AQ-2	Less Than Significant
<b>Greenhouse Gas Emissions</b>			
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	None required	N/A

**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

<b>Environmental Impacts</b>	<b>Level of Significance Without Mitigation</b>	<b>Mitigation/Improvement Measures</b>	<b>Level of Significance With Mitigation</b>
<b>Wind and Shadow</b>			
WS-1: The proposed project would not alter wind in a manner that substantially affects public areas within the vicinity of the project area.	Less Than Significant	None required	N/A
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	None required	N/A
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	None required	N/A
<b>Recreation</b>			
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	None required	N/A
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	None required	N/A
RE-3: The proposed project would not physically degrade existing recreational resources.	Less Than Significant	None required	N/A
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	None required	N/A

**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

<b>Environmental Impacts</b>	<b>Level of Significance Without Mitigation</b>	<b>Mitigation/Improvement Measures</b>	<b>Level of Significance With Mitigation</b>
<b>Utilities and Service Systems</b>			
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	None required	N/A
UT-2: The proposed project would not require expansion or construction of new water supply or treatment facilities.	Less Than Significant	None required	N/A
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	None required	N/A
UT-4: Construction and operation of the proposed project would comply with all applicable statutes and regulations related to solid waste.	Less Than Significant	None required	N/A
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	None required	N/A
<b>Public Services</b>			
PS-1: The proposed project would not result in a substantial adverse physical impact associated with the provision of police services.	Less Than Significant	None required	N/A
PS-2: The proposed project would not result in a substantial adverse physical impact associated with the provision of fire services.	Less Than Significant	None required	N/A
PS-3: The proposed project would not result in a substantial adverse physical impact associated with the provision of school services.	Less Than Significant	None required	N/A



**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

<b>Environmental Impacts</b>	<b>Level of Significance Without Mitigation</b>	<b>Mitigation/Improvement Measures</b>	<b>Level of Significance With Mitigation</b>
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	None required	N/A
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	None required	N/A
<b>Biological Resources</b>			
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	None required	N/A
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	Less Than Significant	None required	N/A
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	None required	N/A
<b>Geology and Soils</b>			
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	None required	N/A
GE-2: The proposed project would not result in substantial loss of topsoil or erosion.	Less Than Significant	None required	N/A

**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

<b>Environmental Impacts</b>	<b>Level of Significance Without Mitigation</b>	<b>Mitigation/Improvement Measures</b>	<b>Level of Significance With Mitigation</b>
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	None required	N/A
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	None required	N/A
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	None required	N/A
GE-6: The proposed project would not indirectly destroy a unique paleontological resource or site or unique geologic feature.	Less Than Significant	None required	N/A
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	None required	N/A
<b>Hydrology and Water Quality</b>			
HY-1: The proposed project would not violate water quality standards or otherwise substantially degrade water quality.	Less Than Significant	None required	N/A
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	None required	N/A
HY-3: The proposed project would not result in altered drainage patterns that would cause substantial erosion or flooding.	Less Than Significant	None required	N/A

**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

<b>Environmental Impacts</b>	<b>Level of Significance Without Mitigation</b>	<b>Mitigation/Improvement Measures</b>	<b>Level of Significance With Mitigation</b>
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	None required	N/A
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	None required	N/A
<b>Hazards and Hazardous Materials</b>			
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	None required	N/A
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	None required	N/A
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	None required	N/A
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	None required	N/A

**Table S-2: Summary of Impacts, Mitigation Measures and Improvement Measures Identified in the Initial Study**

<b>Environmental Impacts</b>	<b>Level of Significance Without Mitigation</b>	<b>Mitigation/Improvement Measures</b>	<b>Level of Significance With Mitigation</b>
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	None required	N/A
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	None required	N/A
<b>Mineral and Energy Resources</b>			
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	None required	N/A
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	None required	N/A

Source: LSA, *500 Turk Street Initial Study*, October 11, 2017.

Table S-3: Comparison of Characteristics and Significant Impacts of the Proposed Project with EIR Alternatives

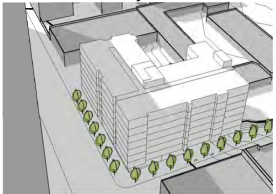
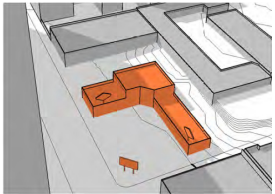
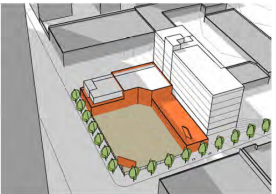
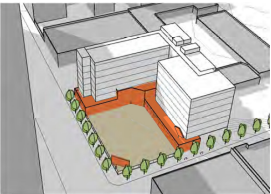
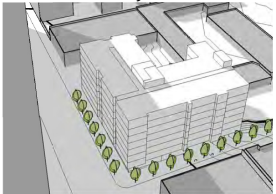
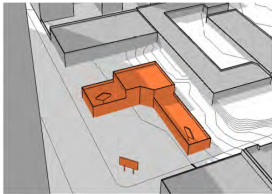
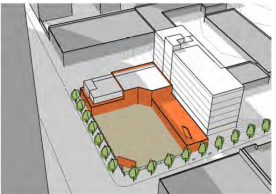
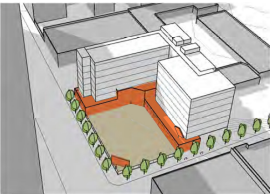
	Proposed Project	No Project Alternative	Full Preservation Alternative	Partial Preservation Alternative
				
<b>Description</b>				
Height (feet)	79	30	72	72
Number of stories	8	2	7	7
Number of affordable residential units	108	0	32	56
Square foot by use				
Residential	81,869	0	26,400	34,000
Residential support and common areas	3,564	0	3,500	3,500
Commercial/retail	2,597	9,430	4,100	2,900
<b>Total square feet</b>	<b>105,802</b>	<b>9,430</b>	<b>44,300</b>	<b>63,980</b>
On-grade open space	5,240	0	6,230	6,230
<b>Ability to meet project sponsor's objectives</b>				
	Yes	No	Some	Some

Table S-3: Comparison of Characteristics and Significant Impacts of the Proposed Project with EIR Alternatives

	Proposed Project	No Project Alternative	Full Preservation Alternative	Partial Preservation Alternative
				
<b>Historic Archaeological Resources</b>				
Historic Architectural Resources	<u>Impact CR-1</u> : The proposed project would cause a substantial adverse change in the significance of the Kahn and Keville Building located at 500 Turk Street, a historic resource as defined by CEQA Guidelines section 15064.5(b). (SUM)	N/A	Reduced impact (LTS)	Reduced impact but same outcome as the proposed project (SUM)
Cumulative – Historic Architectural Resources	<u>Impact C-CR-1</u> : The proposed project, in combination with other past, present and reasonably foreseeable future projects in the project vicinity, could result in a cumulatively considerable contribution to a significant cumulative impact on a historic architectural resource. (SUM)	N/A	Reduced impact (LTS)	Reduced impact but same outcome as the proposed project (SUM)

## Notes:

<sup>1</sup> Plan assumes available openings, such as garage doors, which collectively exceed 25 percent of external wall surfaces facing public streets, can be changed to storefront without being considered "demolition" under Planning Code section 1005. Square footage estimates assume that marketable ground-floor retail spaces would be feasible notwithstanding 75 percent interior demolition limitations.

NI = no impact; LTS = less than significant impact; S = significant; impact SU = significant and unavoidable impact; SUM = significant and unavoidable impact with mitigation; N/A = not applicable

Source: Tenderloin Neighborhood Development Corporation and David Baker Architects, 2017.

## ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Pursuant to CEQA Guidelines section 15126(e)(2), an EIR is required to identify the environmentally superior alternative from among the alternatives evaluated if the proposed project has significant impacts that cannot be mitigated to a less-than-significant level. The Environmentally Superior Alternative is the alternative that best avoids or lessens any significant effects of the proposed project, even if the alternative would impede to some degree the attainment of the project objectives. The No Project Alternative is considered the overall environmentally superior alternative because implementation of the proposed project would not occur with the No Project Alternative. The No Project Alternative, however, would not meet any of the project objectives.

If the No Project Alternative is environmentally superior, CEQA requires selection of the “environmentally superior alternative other than the no project alternative” from among the proposed project and the other alternatives evaluated. The proposed project would result in significant and unavoidable project-level and cumulative impacts related to historic architectural resources. Although the Partial Preservation Alternative would result in a design that meets most of the project’s objectives, its implementation would nonetheless result in a significant and unavoidable adverse impact. The Full Preservation Alternative would be the environmentally superior alternative because, unlike the proposed project or the Partial Preservation Alternative, it would result in less-than-significant impacts related to historic architectural resources as compared to the proposed project, and **Mitigation Measures M-CP-1a, Documentation, M-CP-1b, Interpretive Display, and M-CP-1c, Salvage** would not be required. In addition, potential conflicts with the general plan urban design element and Accountable Planning Initiative policies related to the preservation of historic resources would be avoided. Moreover, of the alternatives considered, the Full Preservation Alternative would require the least amount of physical alteration to the 500 Turk Street historic architectural resource. More specifically, the Full Preservation Alternative would include limited construction of a partial one-story addition to the existing Turk Street Wing of the building and a new seven-story residential tower abutting the north façade of the existing building, which is not a character-defining façade. As the alternative with the least amount of physical alteration and with

preservation of all of the character-defining features (with the exception of one of the Goodyear Tire signs), it would result in the fewest impacts to the historic resource.

## **AREAS OF KNOWN CONTROVERSY AND ISSUES TO BE RESOLVED**

Publication of the NOP/IS initiated a 30-day public review and comment period that began on October 11, 2017, and ended on November 10, 2017. During the review and comment period, one letter was submitted to the planning department by an interested party, advising the city of the consultation process pursuant to AB 52. Correspondence received in response to the NOP/IS is available for review as part of Case File No. 2016-010340ENV. The planning department has considered the comments made by the public in preparation of the draft EIR for the proposed project.

This draft EIR will be circulated for public review and comment. During this period, written comments concerning the accuracy and adequacy of the draft EIR will be accepted and a public hearing will be held before the planning commission to receive oral comments. Following the close of the draft EIR public review and comment period, the planning department will prepare and publish a document entitled “Responses to Comments,” which will contain a copy of all comments on this draft EIR and the city’s responses to those comments, along with copies of the letters received and a transcript of the planning commission public hearing on the draft EIR. This draft EIR, together with the responses to comments document, will be considered by the planning commission in an advertised public meeting, and then certified as a final EIR, if deemed adequate.

The proposed project qualifies for administrative review and approval under San Francisco Planning Code section 315. The administrative review will include CEQA findings that identify significant project-related impacts that would result; discuss mitigation measures or alternatives that have been adopted to reduce significant impacts to less-than-significant levels; determine whether mitigation measures or alternatives are within the jurisdiction of other public agencies; and explain reasons for rejecting mitigation measures or alternatives if any are infeasible for legal, social, economic, technological, or other reasons.



A mitigation monitoring and reporting program (MMRP) will be included in the CEQA findings to the extent that mitigation measures are made part of the proposed project. The MMRP identifies the measures included in the proposed project or imposed as conditions of approval, the entities responsible for carrying out the measures, and the timing of implementation. If significant unavoidable impacts would remain after all feasible mitigation measures are implemented, the CEQA findings must include a statement of overriding considerations explaining how the benefits of the proposed project would outweigh the significant impacts.

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# I. INTRODUCTION

## PROJECT SUMMARY

The Tenderloin Neighborhood Development Corporation (project sponsor), a non-profit affordable housing developer, proposes to redevelop 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 (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 and residential amenity space, and approximately 5,240 square feet of common open space within a ground floor courtyard. 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 San Francisco Planning Code (planning code). Chapter II, Project Description, pp. 11–32, provides a detailed description of the proposed project.

## PURPOSE OF THE EIR

This environmental impact report (EIR) analyzes the physical environmental effects associated with implementation of the proposed project. This EIR has been prepared by the San Francisco Planning Department (planning department) in the City and County of San Francisco (city), the lead agency for the proposed project, in compliance with the provisions of the California Environmental Quality Act (CEQA) and the CEQA Guidelines (California Public Resources Code section 21000 et seq., and California Code of Regulations Title 14, section 15000 et seq., "CEQA Guidelines"), and Chapter 31 of the San Francisco Administrative Code. The lead agency is the public agency that has the principal responsibility for carrying out or approving a project.

As described by CEQA and in the CEQA Guidelines, public agencies are charged with the duty to avoid or substantially lessen significant environmental effects, where feasible. In undertaking this duty, a public agency has an obligation to balance a project's significant effects on the environment with its benefits, including economic, social, technological, legal, and other non-environmental characteristics.

This EIR is intended as an informational document to: evaluate the proposed project and the potential for significant impacts on the environment; examine methods of reducing adverse environmental impacts; identify any significant and unavoidable adverse impacts that cannot be mitigated; and identify reasonable and feasible alternatives to the proposed project that would eliminate any significant adverse environmental effects or reduce the impacts to a less-than-significant level. The lead agency is required to consider the information in the EIR, along with any other relevant information, in making its decisions on the proposed project. This analysis, in and of itself, does not determine whether a project will be approved, but aids the planning and decision-making process by disclosing the potential for significant and adverse impacts.

In conformance with CEQA and the CEQA Guidelines, this EIR provides objective information addressing the environmental consequences of the project and identifies possible means of reducing or avoiding significant impacts, either through mitigation measures or feasible project alternatives. The city must certify the final EIR prior to acting on the project approval application for the proposed 500 Turk Street project. Under CEQA Guidelines section 15161, this is a project-level EIR. This most common type of EIR examines the environmental impacts of a project and focuses primarily on changes in the environment that would result from project development. This type of EIR examines all phases of a project including planning, construction, and operation.

The CEQA Guidelines help define the role and standards of this EIR, as follows:

- **Information Document.** An EIR is an informational document that will inform public agency decision-makers and the public generally of the significant environmental effect(s) of a project, identify possible ways to minimize significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information that may be presented to the agency (CEQA Guidelines section 15121(a)).
- **Degree of Specificity.** The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity that is described in the EIR. An EIR on a development project will necessarily be more detailed in its discussion of specific effects of the project than will be an EIR on the adoption of a local general plan or comprehensive zoning ordinance because the effects of the construction can be predicted with greater accuracy (CEQA Guidelines section 15146(a)).
- **Standards for Adequacy of an EIR.** An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information, which enables them to make a decision that intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure (CEQA Guidelines section 15151).

Section 15382 of the CEQA Guidelines defines a significant effect on the environment as “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project...” Therefore, in identifying the significant impacts of the project, this EIR focuses on the substantial physical effects and mitigation measures to avoid, reduce, or otherwise alleviate those effects.

## **ENVIRONMENTAL REVIEW PROCESS**

An environmental evaluation application for the 500 Turk Street project was submitted to the planning department on January 9, 2017.

The environmental review process for this project includes a number of steps: publication and circulation for public comment of a notice of preparation/initial study (NOP/IS), publication of a draft EIR for public review and comment, preparation and publication of responses to public and agency comments on the draft EIR, and certification of the final EIR. The environmental review process is initiated when the project sponsor files an environmental evaluation application.

### **Notice of Preparation/Initial Study**

The planning department prepared an initial study and published a notice of preparation of an EIR on October 11, 2017, announcing the intent to prepare and distribute a focused EIR (the NOP/IS is included as Appendix A).

### **Effects Found Not to Be Significant**

The NOP/IS found that the following potential individual and cumulative environmental effects of the project, as fully analyzed in the NOP/IS, would be either less than significant or would be reduced to a less-than-significant level through recommended mitigation measures:

- 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).

### **Effects Found to Be Potentially Significant**

On the basis of this NOP/IS, the topic for which there are project-specific effects that have been determined to be potentially significant is:

- Cultural resources (historic architectural resources only).

The NOP/IS determined that an EIR would be required to analyze this topic under CEQA.

### **Public Review of the NOP/IS**

Publication of the NOP/IS initiated a 30-day public review and comment period that began on October 11, 2017, and ended on November 10, 2017. During the review and comment period, one letter was submitted to the planning department by an interested party, advising the city of the consultation process pursuant to AB 52. This issue is addressed on pp. 51-52 of the NOP/IS.

Correspondence received in response to the NOP/IS is available for review as part of Case File No.

2016-010340ENV. The planning department has considered the comments made by the public in preparation of the draft EIR for the proposed project.

### **Draft Environmental Impact Report**

This draft EIR has been prepared in accordance with CEQA and the CEQA Guidelines. It provides an analysis of the project-specific physical environmental impacts of construction and operation of the proposed project, and the project's contribution to the environmental impacts from past, present, and reasonably foreseeable future development in the project site vicinity and the city as a whole.

Copies of the draft EIR are available at the Planning Information Center (PIC) counter at the San Francisco Department of Building Inspection, 1660 Mission Street, 1st Floor. The draft EIR is also available for viewing or downloading at the planning department website, <http://tinyurl.com/sfceqadocs>, by choosing the link for Negative Declarations and EIRs under "Current Documents for Public Review" and searching for Case File No. 2016-010340ENV. You may also request that a copy be sent to you by calling (415) 575-9072 or emailing the environmental planner, Jeanie Poling, at [Jeanie.poling@sfgov.org](mailto:Jeanie.poling@sfgov.org).

All documents referenced in this draft EIR, and the distribution list for the draft EIR, are available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2016-010340ENV.

### **How to Comment on the Draft EIR**

This draft EIR was published on November 22, 2017. There will be a public hearing before the planning commission during the 45-day public review and comment period for this EIR to solicit public comment on the adequacy and accuracy of information presented in this draft EIR. The public comment period for this EIR is November 22, 2017, to January 16, 2018. The public hearing on this draft EIR has been scheduled before the planning commission for January 11, 2018, in Room 400, City Hall, 1 Carlton B. Goodlett Place, beginning at 1 p.m. or later. Please call (415) 588-6422 the week of



the hearing for a recorded message giving a more specific time. In addition, members of the public are invited to submit written comments on the adequacy of the document, that is, whether this draft EIR identifies and analyzes the possible environmental impacts and identifies appropriate mitigation measures. Comments are most helpful when they suggest specific alternatives and/or additional measures that would better mitigate significant environmental effects.

Written comments should be submitted to:

Jeanie Poling, Environmental Planner  
Re: 500 Turk Street Project Draft EIR  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

Comments may also be submitted by email to [jeanie.poling@sfgov.org](mailto:jeanie.poling@sfgov.org). Comments must be received by 5 p.m., on January 16, 2018.

Commenters are not required to provide personal identifying information. All written and 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 San Francisco Planning Department's website or in other public documents.

Only commenters on the draft EIR will be permitted to file an appeal of the certification of the final EIR to the Board of Supervisors.

#### **Other Hearings Known at the Time of the Draft EIR Publication**

There will be a public hearing before the Historic Preservation Commission on this draft EIR on December 6, 2017, in Room 400, City Hall, 1 Dr. Carlton B. Goodlett Place, beginning at 12:30 p.m. or

later.<sup>1</sup> During that hearing, the Historic Preservation Commission will consider providing comments on this draft EIR.

### **Final EIR**

Following the close of the draft EIR public review and comment period, the planning department will prepare and publish a document entitled “Responses to Comments,” which will contain a copy of all comments on this draft EIR and the city’s responses to those comments, along with copies of the letters received and a transcript of the planning commission public hearing on the draft EIR. This draft EIR, together with the responses to comments document, will be considered by the planning commission in an advertised public meeting, and then certified as a final EIR, if deemed adequate.

The proposed project qualifies for administrative review and approval under Planning Code section 315. The administrative review will include CEQA findings that identify significant project-related impacts that would result; discuss mitigation measures or alternatives that have been adopted to reduce significant impacts to less-than-significant levels; determine whether mitigation measures or alternatives are within the jurisdiction of other public agencies; and explain reasons for rejecting mitigation measures or alternatives if any are infeasible for legal, social, economic, technological, or other reasons.

A mitigation monitoring and reporting program (MMRP) will be included in the CEQA findings to the extent that mitigation measures are made part of the proposed project. The MMRP identifies the measures included in the proposed project or imposed as conditions of approval, the entities responsible for carrying out the measures, and the timing of implementation. If significant

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<sup>1</sup> Note that this is not a public hearing on the draft EIR to receive public comments on the adequacy of the information or analysis provided in the draft EIR. Public comments at this hearing will not be included in or responded to in the response to comments document. The HPC reviews applications for exterior alterations, site improvements, and new construction affecting San Francisco’s designated landmarks, historic buildings, and sites within historic districts.

unavoidable impacts would remain after all feasible mitigation measures are implemented, the CEQA findings must include a statement of overriding considerations explaining how the benefits of the proposed project would outweigh the significant impacts.

## **ORGANIZATION OF THE DRAFT EIR**

This draft EIR has been organized as follows:

- **Summary:** This chapter summarizes the EIR by providing a concise overview of the project; the environmental impacts that would result from the project; mitigation measures identified to reduce or eliminate these impacts; and project alternatives.
- **Chapter I – Introduction:** This chapter includes a summary of the proposed project, a discussion of the purpose of the EIR, a list of the EIR organization, and a discussion of the environmental review process, including a list of areas of controversy to be resolved.
- **Chapter II – Project Description:** This chapter discusses the objectives of the proposed project; provides background data on the project location; describes the operational and physical characteristics of the project; and identifies project approvals.
- **Chapter III – Plans and Policies:** This chapter provides a summary of the plans, policies, and regulations of the City and County of San Francisco that are applicable to the proposed project.
- **Chapter IV – Environmental Setting and Impacts:** This chapter describes the project’s existing setting, environmental impacts, cumulative impacts, and mitigation measures. Due to the nature of the proposed project, this focused EIR will analyze the environmental topic of Historic Architectural Resources.

- **Chapter V – Other CEQA Issues:** This chapter describes growth inducement that would result from the proposed project; summarizes the significant environmental effects that cannot be mitigated to a less-than-significant level; describes significant irreversible changes that would result if the project is implemented; and includes a summary of the comments received on the scope of the EIR and responses to those comments.
- **Chapter VI – Alternatives:** This chapter presents alternatives to the proposed project, including the No Project Alternative; Full Preservation Alternative; and Partial Preservation Alternative, as well as other alternatives considered but rejected as infeasible. In addition, the environmentally superior alternative is identified.
- **Chapter VII – Report Preparers:** This chapter identifies preparers of the EIR.
- **Appendices:** Appendices include the NOP/IS (Appendix A).

## II. PROJECT DESCRIPTION

### PROJECT OVERVIEW

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 23 studio units, 21 one-bedroom units, 50 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).<sup>1</sup>

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

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<sup>1</sup> 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](http://sfmohcd.org/sites/default/files/Documents/MOH/Asset%20Management/2017%20AMI-IncomeLimits-HMFA_04-21-17.pdf), accessed September 15, 2017.

description of the proposed project, including a list of project objectives, a detailed description of the proposed project's regional and local context, planning process and background, as well as a discussion of requested project approvals.

## PROJECT SPONSOR'S OBJECTIVES

According to the project sponsor, the proposed project's key objectives are to:

1. Replace the existing building on the underutilized project site with a 100 percent affordable housing development with ground floor retail uses, common open space, and common residential amenity spaces.
2. Construct a high-quality project that includes a sufficient number of residential units and commercial space to make the development economically feasible for the project sponsor, its lenders, and its investors.
3. Maximize the number of affordable residential units on the project site to: (a) respond to the current shortage of affordable housing, consistent with the City's Affordable Housing Goals Policy Declaration (Proposition K); (b) contribute to meeting the objectives of the City's General Plan Housing Element; and (c) contribute to ABAG's Regional Housing Needs Allocation for the City.
4. Provide a range of dwelling unit sizes, including family-sized units, as requested by the Mayor's Office of Housing and Community Development, pursuant to the mandate to prioritize vulnerable populations, including working families, through use of Affordable Housing Bond (Proposition A) monies.
5. Create attractive and active building frontages along Turk and Larkin streets, which would better define those streets and embrace the public realm as compared to existing conditions, consistent with city plans and policies, including but not limited to the Urban Design Element's Fundamental Principles of Neighborhood Environment and Residential Design Guidelines.
6. Provide ample and conveniently located open space that enhances the quality of life for residents through the provision of outdoor common open space on the ground floor.
7. Create a mixed-use project consistent with the land use controls in the Residential-Commercial, High Density (RC-4) zoning district and the dwelling unit density controls in Subarea No. 1 of the North of Market Residential Special Use District.

8. Create a transit-oriented development that utilizes environmentally conscious construction materials and methods.

## 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 II-1** shows the location of the project site and **Figure II-2**, p. 15, provides an aerial view of the site. **Figure II-3**, p. 16, 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 on-street parking spaces 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.

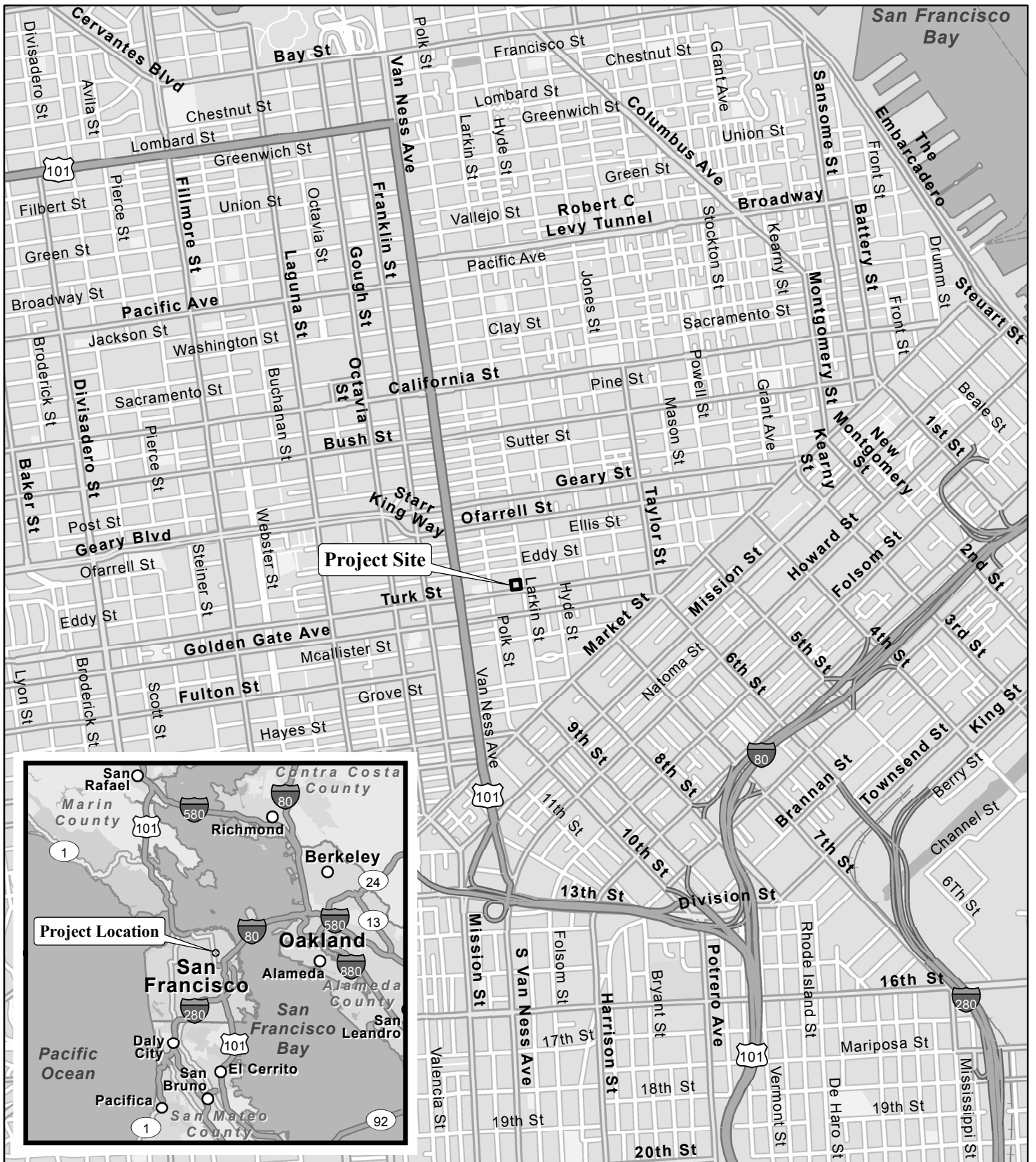
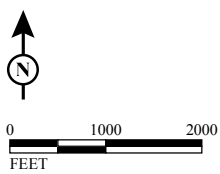


FIGURE II-1



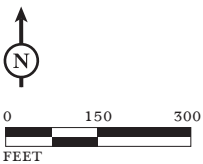
SOURCE: ESRI StreetMap North America (2012).


500 Turk Street Project  
Project Location and Regional Vicinity Map





FIGURE II-2



 Project Site

*500 Turk Street Project*  
 Aerial Photograph of Project Site  
 and Surrounding Land Uses

SOURCES: GOOGLE EARTH, JULY 2016; LSA ASSOCIATES, INC., 2017.



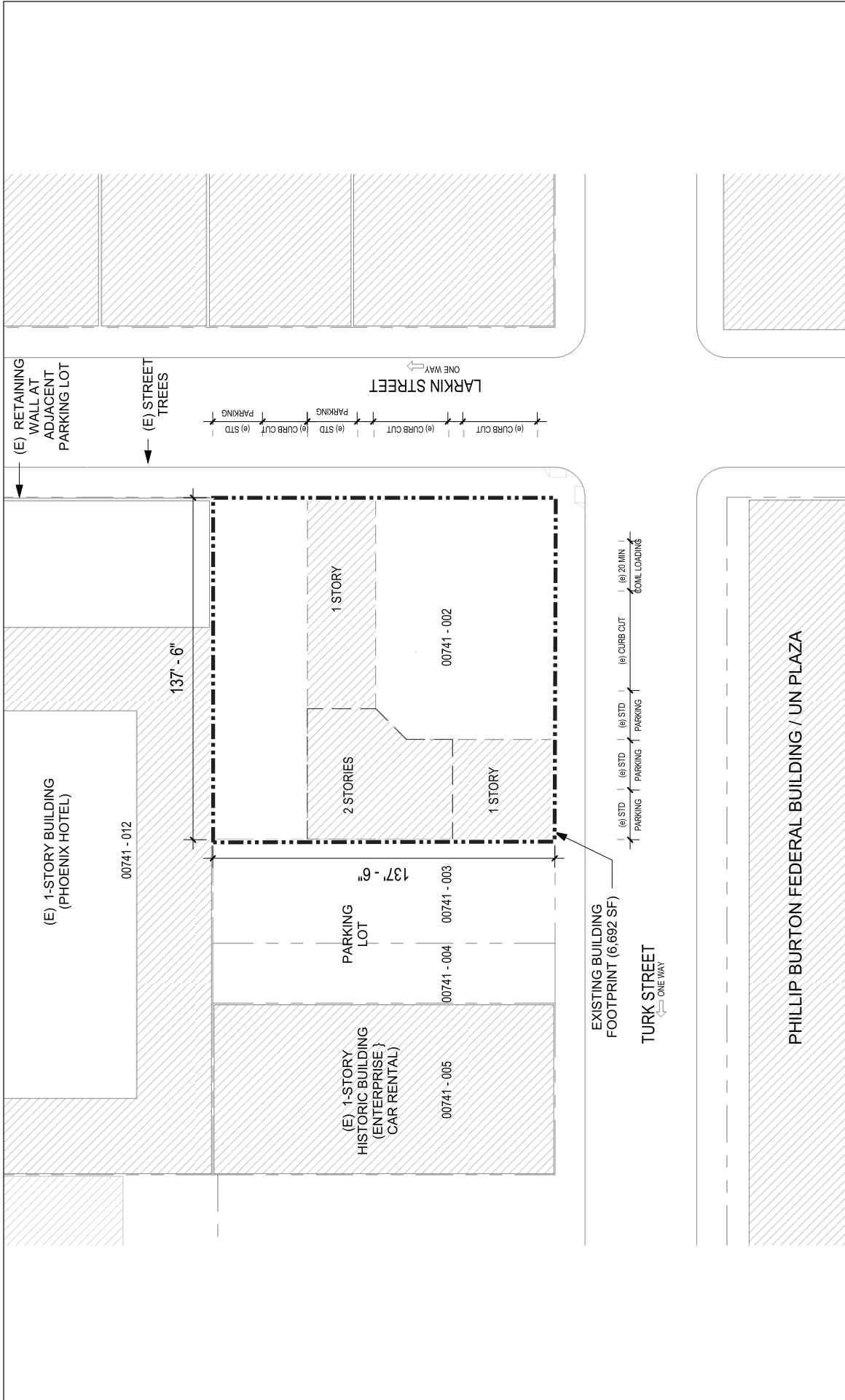


FIGURE II-3



NOT TO SCALE



Project Boundary

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 (NRHP) 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.<sup>2</sup> 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),<sup>3</sup> 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.<sup>4</sup>

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 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.

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<sup>2</sup> 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. 2016-010340ENV.

<sup>3</sup> Historic resource categories for CEQA review are defined in *San Francisco Preservation Bulletin No. 16*, May 5, 2004. Available at [http://default.sfplanning.org/Preservation/bulletins/HistPres\\_Bulletin\\_16.PDF](http://default.sfplanning.org/Preservation/bulletins/HistPres_Bulletin_16.PDF).

<sup>4</sup> Cleemann, Jorgen G., Preservation Planner, San Francisco Planning Department, *Historic Resources Evaluation Response, 500 Turk Street*, June 5, 2017.

**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 23 studio units, 21 one-bedroom units, 50 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 onsite parking is proposed.

**Figure II-4** depicts the conceptual ground level floor plan; **Figure II-5**, p. 20, depicts a typical floor plan for the second through eighth levels; and **Figure II-6**, p. 21, depicts the roof plan. **Figures II-7a and II-7b**, pp. 22-23, illustrate conceptual south and east building elevations. **Table II-1** provides a summary of the proposed project components.

**Table II-1: Proposed Project Details**

Proposed Use	Total
Residential Use	82,000 sf
Commercial Use	2,600 sf
Total Floor Area	106,000 sf
Open Space	5,240 sf
Number of Dwelling Units	108 (23 studios, 21 one-bedrooms, 50 two-bedrooms, and 14 three-bedrooms)
Number of Parking Spaces	10 on-street (5 net new)
Number of Loading Spaces	2 on-street, white curb zones
Number of Bicycle Parking Spaces	110 <i>class 1</i> and 12 <i>class 2</i>
Height of Building	79 feet
Number of Stories	8

sf = square feet; all sf numbers are approximate

Source: Tenderloin Neighborhood Development Corporation, April 2017.



FIGURE II-4

NOT TO SCALE

500 Turk Street Project  
 Conceptual Ground Floor Plan

SOURCES: DAVID BAKER ARCHITECTS; TNDC, JUNE 2017.



FIGURE II-5

NOT TO SCALE

500 Turk Street Project  
 Conceptual Upper Floor Plan

SOURCES: DAVID BAKER ARCHITECTS; TND, JUNE 2017.



FIGURE II-6

500 Turk Street Project  
 Conceptual Roof Plan



NOT TO SCALE

SOURCE: DAVID BAKER ARCHITECTS, JUNE 2017.

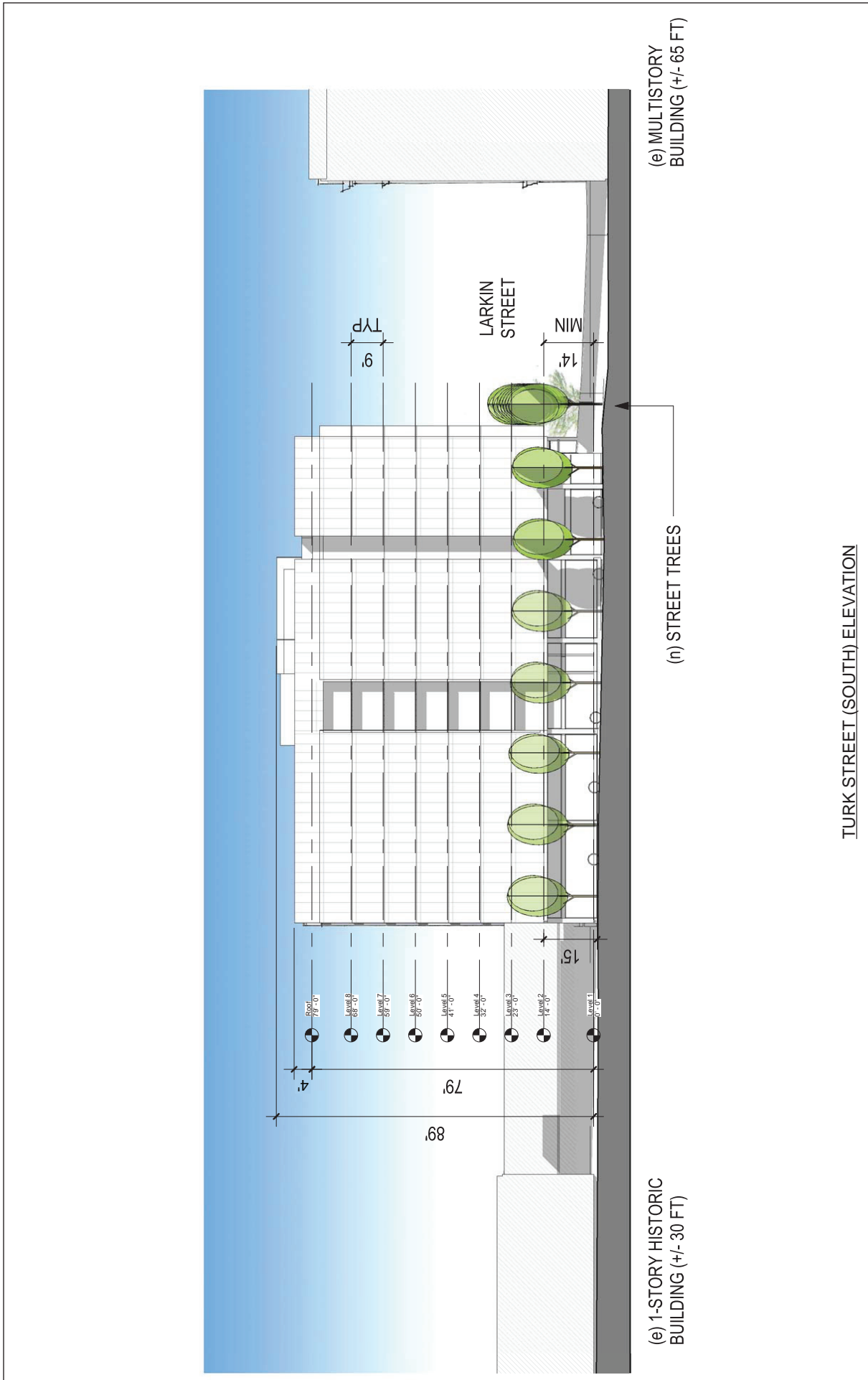


FIGURE II-7a

NOT TO SCALE



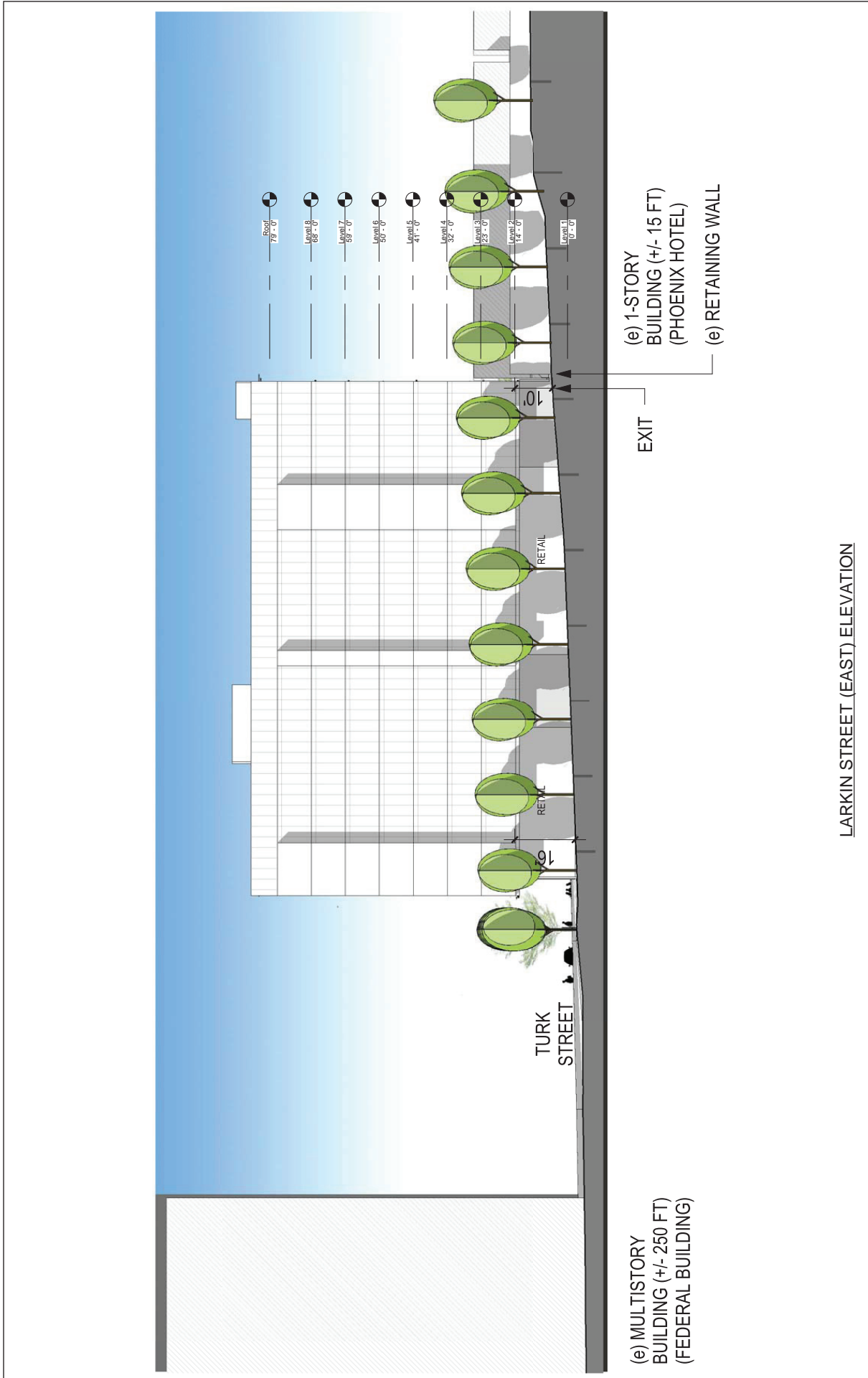


FIGURE II-7b

NOT TO SCALE

SOURCES: DAVID BAKER ARCHITECTS; TNDC, JUNE 2017.

500 Turk Street Project  
 Conceptual Building Elevations

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### **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 wing fronting 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 onsite 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 23 studio units, 21 one-bedroom units, 50 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.

### **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 II-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 II-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.

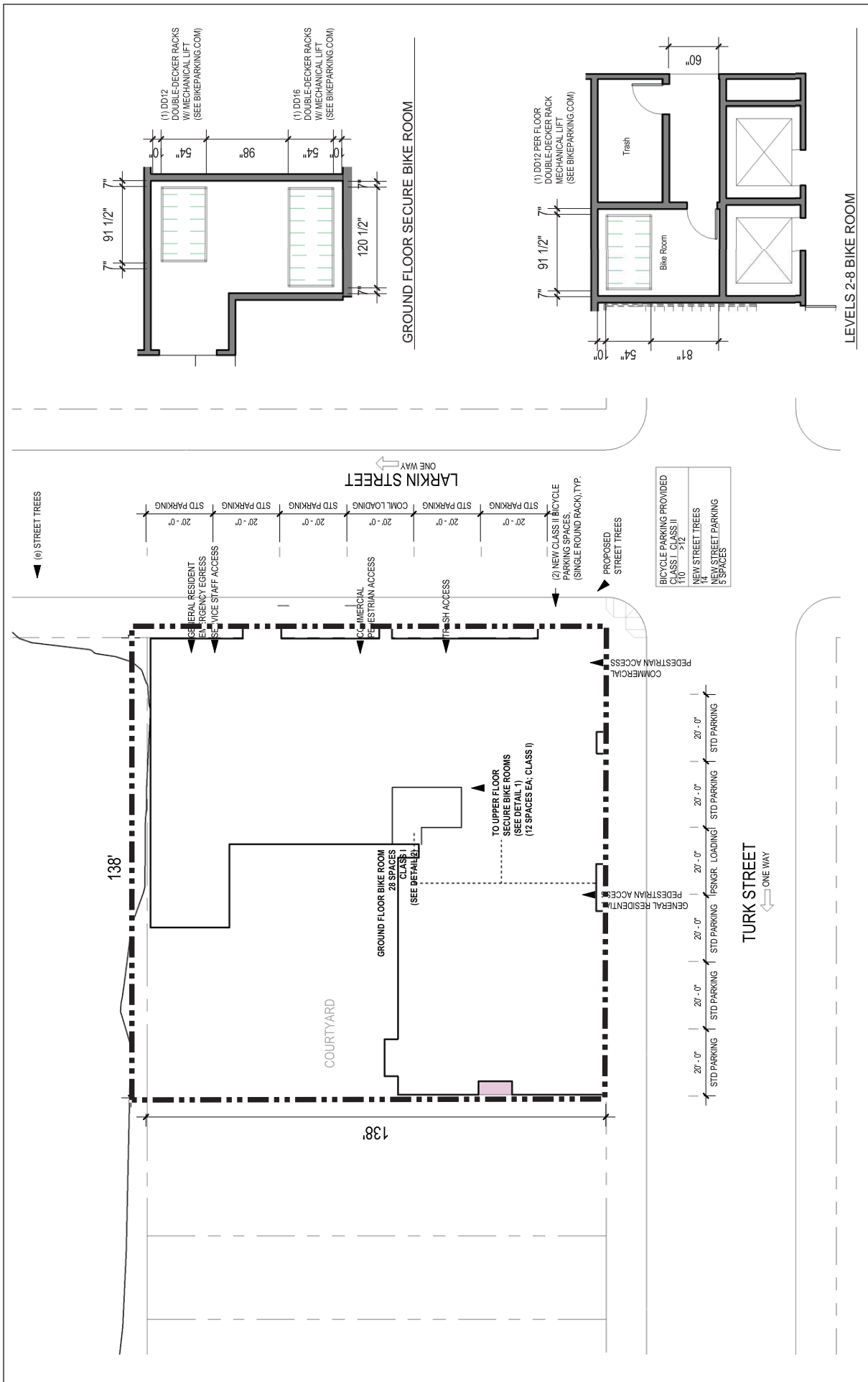


FIGURE II-8

NOT TO SCALE

Project Site Boundary

The project would include 110 secured *class 1* bicycle parking spaces and 12 *class 2* (on-sidewalk) bicycle parking spaces.<sup>5</sup> 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<sup>6</sup> 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 onsite structure and removal of all existing onsite 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 on 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<sup>7</sup>

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<sup>5</sup> *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.

<sup>6</sup> 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.

<sup>7</sup> Langan Engineering and Environmental Services, Inc. *Geotechnical Investigation 500 Turk Street San Francisco, California*. December 21, 2016.

prepared for the proposed project. Construction of the proposed project is anticipated to occur over a 22-month period.

## 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 zoning 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**

- Approval of 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);
- Approval of a stormwater control plan, landscape plan per the city's Water Efficient Irrigation Ordinance, changes to sewer laterals (connections to city sewer), and review of water budget application per the city's Non-Potable Water Ordinance 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).

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### III. PLANS AND POLICIES

This chapter provides a summary of the relevant plans and policies of the City and County of San Francisco (city) that are applicable to the proposed project and focuses in particular on the project's potential inconsistencies with applicable plans and policies that could result in environmental impacts. The determination of whether a project is consistent with a specific plan or policy can be subjective, and is best made with a broad understanding of the often-competing policy objectives in a planning document. As a result, policy consistency determinations are ultimately made by the city's local decision-makers (i.e., planning department, zoning administrator, planning commission, and/or board of supervisors). This consideration of policies would occur independently of the environmental review process, as part of the decision to approve or reject the project. The analysis in this chapter is intended to provide decision-makers with a discussion of planning considerations that are pertinent to the proposed project and associated development site, and a preliminary conclusion regarding whether the project may be inconsistent with identified plans and policies. These preliminary conclusions are intended to supplement decision-makers' own understanding of the various and often-competing policy considerations.

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. A policy inconsistency is considered significant pursuant to CEQA only when it would result in a significant, adverse physical environmental impact. The potential instances of such conflicts are discussed in the topical section (i.e., Section IV.A, Historic Architectural Resources, pp. 51–96) of this draft EIR or in the NOP/IS (Appendix A).

The main documents that guide planning and land use within and around the project site are:

- San Francisco General Plan
- San Francisco Planning Code
- The Accountable Planning Initiative
- San Francisco Affordable Housing Policy (Proposition K)
- Sustainability Plan
- Climate Action Plan
- Transit First Policy
- Bicycle Plan
- Better Streets Plan
- Transportation Sustainability Fee Ordinance
- Plan Bay Area
- Association of Bay Area Governments Projections 2013
- Regional Housing Needs Plan for the San Francisco Bay Area: 2014-2022
- Clean Air Plan
- San Francisco Basin Plan

Environmental plans and policies are those, like the Bay Area 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 the characteristics of the city's physical environment. The proposed project would not obviously or substantially conflict with any such adopted environmental plan or policy. Resource-specific and regional plans and policies are discussed in the specific topical section of this EIR or in the NOP/IS contained in Appendix A (e.g., air quality), as appropriate.

Potential inconsistencies with the San Francisco General Plan and Accountable Planning Initiative are discussed below. No potential inconsistencies with the other plans and policies listed above were identified.

## **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 draft EIR would be considered in that context and would not alter the analysis of physical environmental impacts found in this draft EIR.

As discussed below, the proposed project could be inconsistent with certain aspects of the general plan's urban design element related to conserving resources which provide a sense of continuity with the past.

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 then-innovative design that incorporates an open vehicle maneuvering area at the corner. The planning department has also determined that the marquee and other 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 are discussed in Section IV.A, Historic Architectural Resources, pp. 51–96, of this EIR.

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.

### **SAN FRANCISCO PLANNING CODE**

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 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.

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, this project is eligible for an exception for qualified affordable housing projects under Planning Code section 315, and the proposed project qualifies for administrative review and approval by the planning department.

The project sponsor is requesting zoning administrator review and approval of three modifications/variances in its application for the proposed project: (1) a modification for configuration of the project's rear yard; (2) an inner court dimensions variance; and (3) a dwelling unit exposure variance allowing nine dwelling units to not fully comply with horizontal dimension requirements.

The following section describes the proposed project's consistency with the land use districts and use, bulk, height, and other regulations associated with the project site.

### **Use District**

As previously discussed, 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 residential and commercial uses and density of development are principally permitted within the North of Market Residential Special Use District and RC-4 district, respectively.

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, as permitted under the planning code. Such variances and modifications may be requested by a project sponsor under the planning code. 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.

Implementation of the proposed project would not require the adoption of any legislative amendments to the provisions of the planning code or zoning maps.

### **Height and Bulk District**

The city's height and bulk districts are intended to serve a variety of urban design purposes. Generally, these height and bulk districts seek to relate the scale of new development to existing development, in order to prevent the new development from overwhelming or dominating the city's skyline. The regulation of height and bulk is also intended to promote harmony in the visual relationships and transitions between new and existing development. The proposed project site is located in the 80-T height and bulk district. Per article 2.5 of the planning code, the 80-T height and bulk district allows a maximum building height of 80 feet, with exceptions for additional features, such as elevator or stair overruns or other rooftop 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.

### **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 the NOP/IS (Appendix A) or this EIR.

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 the NOP/IS or in the topical section of this EIR.

The proposed demolition of the existing building on the project site, which has been identified as a historic 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 polices, 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.

## **SUMMARY**

Based upon the discussion presented in this chapter, the proposed project could potentially conflict with policies in the urban design element of the general plan and the Accountable Planning Initiative related to the preservation of historic resources (because the project would result in the demolition of a historic resource as defined by CEQA). As discussed above and in the NOP/IS, the proposed project also implements various policies of the general plan, particularly those related to infill development, residential housing production, and providing affordable and supportive housing, as well as open space. The project application includes requests for zoning administrator approval of three modifications/variances. City decision-makers will ultimately make a consistency determination as part of the project approval process.

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## IV. ENVIRONMENTAL SETTING AND IMPACTS

This chapter addresses the physical environmental effects that could occur with implementation of the proposed project and contains an analysis of each issue that was identified in the NOP/IS (included in Appendix A) as a topic for analysis in the 500 Turk Street project EIR. This chapter provides an overview of the process for evaluation of significant environmental effects, the format of and approach to the environmental analysis, and the general environmental setting within the vicinity of the site and the cumulative project setting. Section A of this chapter describes the environmental setting of the project site related to historic architectural resources and the impacts which may result. Mitigation measures to reduce potential impacts are identified, where appropriate.

The project sponsor, Tenderloin Neighborhood Development Corporation, filed an application on January 9, 2017, for the environmental evaluation of the proposed project. Based on the NOP/IS published on October 11, 2017, the San Francisco Planning Department determined that an EIR is required. The NOP/IS concluded that many of the physical environmental effects of the proposed project would be less than significant, or that implementation of mitigation measures, agreed to by the project sponsor and required as a condition of project approval, would reduce significant impacts to a less-than-significant level. CEQA does not require further assessment of the project's less-than-significant impacts, which fall into the following topical areas: land use and land use planning; aesthetics; population and housing; cultural and paleontological resources; transportation and circulation; noise; air quality; greenhouse gas emissions; wind and shadow; utilities and service systems; public services; biological resources; geology and soils; hydrology and water quality; mineral and energy resources; and agriculture and forest resources. However, the NOP/IS found potentially significant project-specific effects related to historic architectural resources. Accordingly, this topic is evaluated in this EIR.

## DETERMINATION OF SIGNIFICANCE

Under CEQA, a significant effect is defined as a substantial, or potentially substantial, adverse change in the environment. The guidelines implementing CEQA direct that this determination be based on scientific and factual data, including the entire record for the project, and not on argument, speculation, or unsubstantiated evidence. Each impact and mitigation measure section of this chapter is prefaced by certain criteria, which have been developed by the San Francisco Planning Department for use in determining whether an impact is significant.

Impacts are categorized by type of impact as follows:

- *No Impact.* No adverse changes (or impacts) to the environment are expected.
- *Less Than Significant.* An impact that would not involve an adverse physical change to the environment, does not exceed the defined significance criteria, or would be eliminated or reduced to a less-than-significant level through compliance with existing local, state, and federal laws and regulations.
- *Less Than Significant with Mitigation.* An impact that is reduced to a less-than-significant level through implementation of the identified mitigation measure.
- *Significant and Unavoidable with Mitigation.* An adverse physical environmental impact that exceeds the defined significance criteria and can be reduced through compliance with existing local, state, and federal laws and regulations and/or implementation of all feasible mitigation measures, but cannot be reduced to a less-than-significant level.
- *Significant and Unavoidable.* An adverse physical environmental impact that exceeds the defined significance criteria and cannot be eliminated or reduced to a less-than-significant level through compliance with existing local, state, and federal laws and regulations and for which there are no feasible mitigation measures.

## FORMAT OF ENVIRONMENTAL ANALYSIS

The historic architectural resources environmental topic considered in this chapter comprises three primary sections: 1) environmental setting; 2) regulatory framework; and 3) impacts and mitigation measures. An overview of the general organization and the information provided in the three sections is provided as follows:

- **Setting.** The setting section provides a description of the baseline physical setting for the project site and its surroundings at the beginning of the environmental review process (e.g., existing historic resources).
- **Regulatory Framework.** The regulatory framework provides an overview of the federal, State, and local regulations (as applicable) that relate to the topic of historic architectural resources.
- **Impacts and Mitigation Measures.** The impacts and mitigation measures section presents a discussion of the impacts (i.e., the changes to baseline physical environmental conditions) that could result from implementation of the proposed 500 Turk Street project. The section begins with the criteria of significance, which establish a way of determining whether an impact is significant. The latter part of this section presents the impacts from the proposed project and mitigation measures, if required. The impacts of the proposed project are organized into separate categories based on the criteria listed in each topical section. Project-specific impacts are discussed first, followed by cumulative impacts.

Impacts are numbered and shown in bold type, and the corresponding mitigation measures, where identified, are numbered and indented, and follow impact statements. Impacts and mitigation measures are numbered consecutively within each topic and begin with an abbreviated reference to the impact section (e.g., CR). The following symbols are used for individual topics:

CR: Historic Architectural Resources

## 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.



## **APPROACH TO ANALYSIS**

The historic architectural resources analysis includes an evaluation of the potential environmental impacts associated with implementation of the proposed project. As described in Chapter II, Project Description, pp. 11–32, the proposed project would result in the demolition of the existing tire and automobile service building and associated signage and surface parking lot. Project-related construction and operation impacts are identified, where applicable.

## **CUMULATIVE ANALYSIS**

### **Approach**

CEQA defines cumulative impacts as “two or more individual effects, which, when considered together, are considerable, or which can compound or increase other environmental impacts.” Section 15130 of the CEQA Guidelines requires that an EIR evaluate potential environmental impacts that may be individually limited but cumulatively significant. These impacts could result from the proposed project alone, or together with other projects. The CEQA Guidelines state: “The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects.” Cumulative impacts could result from individually minor but collectively significant projects taking place over time.

For the evaluation of cumulative impacts, CEQA allows the use of either a list of past, present, or reasonably anticipated relevant projects, including projects outside the control of the lead agency, a summary of the projections in an adopted planning document, or a combined list-based and growth projections approach. For the 500 Turk Street project, the cumulative analysis primarily relies on a list of past, present, and reasonably foreseeable cumulative development projects within a one quarter-mile radius of the project site.

## Setting

Past, present, and reasonably foreseeable cumulative development projects within a one quarter-mile radius of the project site include a number of new residential and mixed-use buildings. **Table IV-1** includes a list of all cumulative development projects within one quarter mile of the project site. **Figure IV-1** shows the location of each cumulative project. These cumulative projects are either approved or the subject of an environmental evaluation application on file with the planning department.<sup>1</sup> The three projects that involve the demolition of historic architectural resources under CEQA are discussed in Section IV.A, Historic Architectural Resources of this draft EIR.

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<sup>1</sup> This list and map of cumulative projects has been updated from Table 2, pp. 22-23 in the initial study (Appendix A) to include historic resource information. One project, 540 Van Ness Avenue, was removed from the list because while a preliminary project assessment was issued, no environmental application has been filed, thus it is not a foreseeable project.

**Table IV-1: Cumulative Projects in the Project Vicinity**

Cumulative Project No. (see Figure IV-1)	Address	Case No.	Project Status Environmental Review	Net New Dwelling Units	Net New Commercial Space (Sq. Ft.)	Description
1	101 Hyde St (1 block away)	2012.0086E, X	Complete	85	4,923	Demolition of a non-historic building and construction of a new eight-story residential building with ground-floor retail space.
2	145 Leavenworth St (2 blocks away)	2012.1531E, X	Complete	94	3,776	New eight-story residential building with group housing rooms and ground-floor retail space on a vacant lot.
3	430 Eddy St (2 blocks away)	2014.0400E, CUA	Complete	22	0	New eight-story residential building on a vacant lot.
4	519 Ellis St (3 blocks away)	2014.0506E, CUA	Complete	28	2,547	New eight-story residential building with ground-floor commercial space on a vacant lot.
5	469 Eddy St (2 blocks away)	2014.0562E, CUA	Complete	29	2,600	Demolition of a two-story garage that is a contributor to the Uptown Tenderloin Historic District and construction of a new eight-story residential building with ground-floor retail space.
6	555 Golden Gate Ave (2 blocks away)	2014.1102E, CUA	Underway	52	1,000	Demolition of a non-historic commercial building and construction of a 10-story residential building with ground-floor commercial space.
7	1001 Van Ness Ave (6 blocks away)	2014.1305ENV, CUA	Complete	239	5,100	Demolition of a non-historic four-story commercial building and construction of a 14-story residential building with commercial space.
8	719 Larkin St (3 blocks away)	2015-005329ENV, CUA	Complete	42	1,400	Demolition of a commercial building that is a contributor to the Uptown Tenderloin Historic District and construction of an eight-story residential building with ground-floor commercial space.
9	830 Eddy St (4 blocks away)	2015-009460ENV, CUA	Complete	126	0	Demolition of a non-historic two-story parking structure and construction of a 15-story residential building.
10	600 Van Ness (2 blocks away)	2015-012729ENV, CUA	Underway	152	5,894	Demolition of a non-historic one-story commercial building and construction of a 12-story residential building with ground-floor commercial space.
11	135 Hyde St (1 block away)	2015-015203ENV, DNX	Underway	72	910	Demolition of a one-story garage that is a contributor to the Uptown Tenderloin Historic District and construction of an eight-story residential building with ground-floor commercial space.
12	200 Larkin St (3 blocks away)	2015-015229ENV	Complete	0	0	12,000 sf addition to the Asian Art Museum.
<b>Total</b>				<b>1,044</b>	<b>36,860</b>	

Source: San Francisco Planning Department, *Cumulative Projects List*, June 13, 2017; updated October 11, 2017.

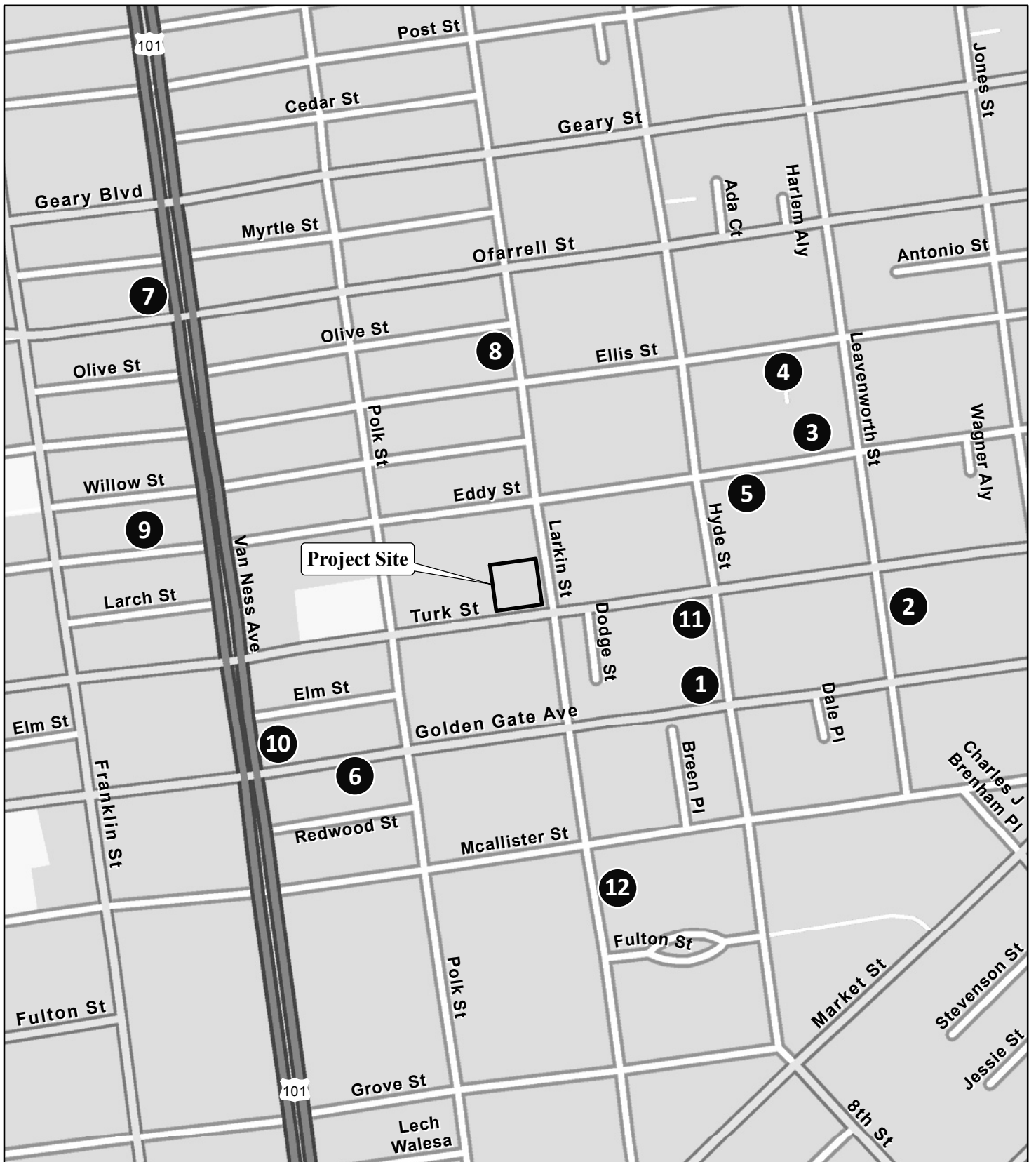
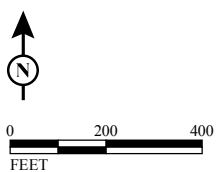


FIGURE IV-1



- |                       |                        |                      |
|-----------------------|------------------------|----------------------|
| 1 101 Hyde St.        | 5 469 Eddy St.         | 9 830 Eddy St.       |
| 2 145 Leavenworth St. | 6 555 Golden Gate Ave. | 10 600 Van Ness Ave. |
| 3 430 Eddy St.        | 7 1001 Van Ness Ave.   | 11 135 Hyde St.      |
| 4 519 Ellis St.       | 8 719 Larkin St.       | 12 200 Larkin St.    |

*500 Turk Street Project  
Cumulative Projects Map*

SOURCE: ESRI StreetMap North America (2012).

## A. HISTORIC ARCHITECTURAL RESOURCES

As defined in CEQA Guidelines section 15064.5(a), a “historical resource” shall include one that is listed in, or determined eligible for listing in, the California Register of Historical Resources (CRHR). This subsection describes historic architectural resources within the project site, identifies potential historic architectural resources in the vicinity of the project site, and evaluates potential direct and indirect impacts to those resources that could result from the proposed project.

For the purposes of this EIR, the term “historic architectural resource” is used to distinguish such resources from archaeological resources, which may also be considered historic resources under CEQA. The Notice of Preparation/Initial Study (included as Appendix A to this EIR) determined that with implementation of **Mitigation Measure M-CP-2, Archeological Testing**, pp. 46-51, the project would not cause adverse impacts to potential archeological resources that may be present within the project site. Therefore, further discussion of archeological resources is not required in this EIR.

Project impacts on a “historical resource,” as defined by CEQA Guidelines section 15064.5, are analyzed in a two-step process. The first step determines whether a project may impact a resource that falls within the definition of “historical resource” under CEQA. If the project may impact a historic resource, the second step determines whether the project would cause a “substantial adverse change in the significance of the historical resource.” A project that may cause a substantial adverse change in the significance of a historic resource is one that may have significant effect on the environment (CEQA Guidelines section 15064.5(b)(1)(2)). Thus, this subsection has two parts. The setting discussion examines the potential for the presence of historic resources within the project site and adjacent parcels. The impacts discussion evaluates the impacts of the proposed project on the historic resources identified in the setting discussion.

This historic architectural resources section is generally based on descriptive and historical information provided in (1) the 2017 Historic Resource Evaluation Response (2017 HRER) prepared

by the San Francisco Planning Department;<sup>1</sup> (2) the 2017 500 Turk Street – Historic Resource Evaluation, Part 2 – Alternatives Analysis prepared by Left Coast Architectural History (2017 HRE);<sup>2</sup> and; (3) a California Department of Parks and Recreation Form 523 for 500 Turk Street,<sup>3</sup> prepared by William Kostura in 2010 as part of the Van Ness Auto Row Support Structures survey (2010 Survey).<sup>4</sup>

### **Environmental Setting**

The project site contains a one- to two-story, stucco-clad, approximately 9,700-square-foot building of reinforced concrete construction built in 1935 on a square parcel (Block/Lot: 0741/002) at the northwest corner of the Turk and Larkin streets intersection in the Tenderloin Neighborhood of San Francisco. The subject building, known as the “Khan and Keville tires and batteries shop” was designed by architect Henry A. Minton and structural engineer Leon Hagop Nishkian. The building’s L-shaped footprint is arranged along the northern and western parcel boundaries which creates an open paved area facing the street corner for vehicle parking. The subject property also encompasses a rectangular open area, apparently used for parking, to the north of the subject building.

As discussed below, the building on the project site was included and assessed in the 2017 HRE prepared by planning department preservation staff. The HRE concluded that the building at 500 Turk Street is individually eligible for inclusion in the CRHR at the local level of significance under Criteria 1 (events) and 3 (architecture). The period of significance under Criterion 1 is 1935–1972, which encompasses the period of the building’s association with providing automotive support services. Therefore, the building on the project site qualifies as a “historical resource” under CEQA. No other cultural resources are located within the project site.

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<sup>1</sup> San Francisco Planning Department, *Historic Resource Evaluation Response, 500 Turk Street*, June 5, 2017.

<sup>2</sup> Left Coast Architectural History, *Historic Resource Evaluation, Part 2 – Alternatives Analysis*, June 20, 2017.

<sup>3</sup> William Kostura, State of California Department of Parks and Recreation Form 523 for 500 Turk Street, January 2010.

<sup>4</sup> Kostura, William, Architectural Historian, *Van Ness Auto Row Support Structures: A Survey of Automobile-Related Buildings along the Van Ness Avenue Corridor*, 2010.

## 500 Turk Street: Building Description and History

### Building Description

**Figure IV.A-1**, p. 55, depicts the 500 Turk Street building, as viewed looking northwest from the Turk and Larkin street intersection. The building's asymmetrical L-shaped plan consists of a central two-story portion with two, unequal-length perpendicular single-story wings. One wing fronts Turk Street (Turk Street Wing) and the other wing fronts Larkin Street (Larkin Street Wing). The Turk Street Wing is approximately 60 feet long and the Larkin Street Wing is approximately 100 feet long. Behind the Larkin Street Wing is an open paved area used for storing used tires, batteries, and other materials. The two wings merge in a central two-story office portion near the northwest corner of the parcel. This open layout creates an approximately 9,200-square-foot open asphalt-paved area facing the Turk and Larkin street intersection. The building is clad in smooth-textured stucco. Surviving fenestration appears to be the original steel-sash windows that are found in the Turk Street Wing and the central two-story office portion. The Turk Street Wing windows are divided by transom bars and mullions, while windows in the upper floor of the central, two-story portion are divided into smaller lights by mullions and muntins.

The Larkin Street Wing is divided into five bays, three of which are devoted to automobile service. Bays in all three parts of the building – the two wings and the central section – are defined by narrow projecting piers with slanted sides; those piers located at the corners of the wings rise into a tall frieze area and taper to a point. These piers give the building the suggestion of a minimalist Art Deco aesthetic. Other decoration is limited to short vertical hatching impressed into the stucco at the base of each frieze.

Conspicuous and distinctive business and product brand signage is associated with the building and parcel. Most signage is affixed to the building's frieze. In addition, two large, diamond-shaped Goodyear Tires signs are mounted on the roof near the end of each wing. Finally, a billboard-type marquee is mounted on steel columns at the southeast corner of the parcel and faces the Turk Street and Larkin Street intersection. It has changeable lettering that has provided inspirational or irreverent messages for approximately 50 years.

### **Building History**

This building was constructed in 1935 for owner Mrs. F. H. Rolandi according to designs by architect Henry A. Minton and structural engineer L. H. Nishkian. Henry Minton was active in San Francisco from the 1910s–1940s. He is noted for the many churches and schools he designed for the Roman Catholic Church and for his numerous bank designs for the Bank of Italy and Bank of America. Nishkian was a prominent, San Francisco-based structural engineer during the 1920s–1940s. Both Nishkian and Minton worked for San Francisco’s Department of Public Works under M. M. O’Shaughnessy during the 1910s and each worked on at least one major structure in the Hetch Hetchy water supply system. The building on the project site at 500 Turk Street, however, is the only extant example on which it is definitely known that they collaborated.<sup>5</sup>

The first and only occupant of this building has been Kahn and Keville, dealers in tires, automobile batteries, and appliances from 1935 to the present. Harry H. Kahn arrived in San Francisco in 1914 and opened a vulcanizing shop at 409 Larkin Street (demolished). In 1936 Harry Kahn formed a partnership with Hugh J. Keville at 489 Golden Gate Avenue (demolished), where they ran an automobile tires and batteries shop. During 1918–1925 they had a small storefront at 982 Post Street (extant), and during 1925–1935 they were at 1600 Bush Street (also extant). In 1935 they made their final move to the building at the project site.

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<sup>5</sup> San Francisco Planning Department, *Historic Resource Evaluation Response, 500 Turk Street*, June 5, 2017.





FIGURE IV.A-1

500 Turk Street Project  
500 Turk Street Building -  
Looking Northwest at the Turk and Larkin street Intersection

SOURCE: LSA, AUGUST 2017.

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## Neighborhood Context

### Van Ness Auto Row Support Structures Survey

In 2010<sup>6</sup> architectural historian William Kostura prepared the 2010 Survey, an architectural survey of buildings along the Van Ness Avenue corridor that are related to San Francisco's automobile industry from 1900–1964 for the San Francisco Planning Department. The survey area contained approximately 66 city blocks roughly bounded by Pacific Avenue on the north, Larkin Street on the east, Gough Street on the west, Market Street on the south, and a portion of the South of Market Area enclosed by Market Street and the north side of Mission, Eleventh, and Gough streets. The survey identified over 150 buildings, 112 of which were evaluated for CRHR eligibility. Of these, 61 buildings, including the building on the project site at 500 Turk Street, appeared individually eligible for the CRHR. Forty-seven buildings appeared not eligible for the CRHR, either individually or as part of a district (see below). The survey was adopted by the City's Historic Preservation Commission on July 21, 2010.

According to the 2010 Survey, Van Ness Avenue, from its beginning at Market Street to just north of Pacific Avenue, was the premier auto showroom district in San Francisco from shortly after the earthquake and fire of 1906 until the 1980s. Although only a few active auto dealerships remain on the avenue, many buildings that were built as auto showrooms and that have undergone adaptive reuse survive to the present day. In addition, many early garages, auto repair shops, and other automotive support buildings still stand within a two-block radius of Van Ness Avenue. This corridor, about 22 blocks in length and slightly over three blocks in width, contains by far the largest concentration of auto-related buildings in San Francisco. Notably, the 2010 Survey narrowed this area down to one potential historic district, the Pine Street Auto Shops Historic District, which consists of buildings on Pine Street, not including the building on the project site.<sup>7</sup>

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<sup>6</sup> William Kostura, *Van Ness Auto Row Support Structures*, <http://ohp.parks.ca.gov/pages/1054/files/van%20ness%20auto%20row.pdf>, accessed July 18, 2017.

<sup>7</sup> These five buildings were subsequently demolished as part of the 1634–1690 Pine Street project (Case No. 2011.1306E). See: [http://sfmea.sfplanning.org/2011.1306E\\_FEIR1.pdf](http://sfmea.sfplanning.org/2011.1306E_FEIR1.pdf), accessed August 19, 2017.

The 2010 Survey identifies different building types and uses in the larger Van Ness Auto Row Support Structures study area, including automobile showrooms, public garages, multiple-use buildings, automobile engineering schools, repair shops, parts and supply stores, tire stores, specialized service shops, and used automobile salesrooms. Automobile showrooms were identified as the most important and prevalent building type in the survey area. The survey ranked these building types using a hierarchy based on relative importance as elements of the Van Ness Auto Row, as follows: (1) showrooms selling major brands of new automobiles; (2) public garages, multiple-use buildings, and automobile engineering schools; (3) general automobile repair shops; automobile accessories, part, and supply shops; name brand tire shops; and automobile showrooms selling lesser-known brands; (4) specialized repair shops or used automobile salesrooms; and (5) finance and insurance offices.

### **The Uptown Tenderloin Historic District<sup>8</sup>**

Directly to the east of the project site is a portion of the western boundary of the Uptown Tenderloin Historic District (district), which is listed on the National Register of Historic Places (NRHP). Its modern boundaries generally include Geary, Market, and McAllister streets and Van Ness Avenue. At the turn of the 20th century, the Tenderloin included many large single-family homes, as well as smaller townhomes. The area's proximity to San Francisco's central business district, the waterfront, and industrial centers south of Market Street made the neighborhood attractive to many immigrants and served as a short-term residential entry point that allowed them to become more established.<sup>9</sup> Development in the Tenderloin is historically mixed-use, with Larkin Street appearing as solidly commercial prior to the 1906 earthquake and fire consisting mostly of commercial spaces, restaurants, music halls, and theaters.

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<sup>8</sup> This section is based on a National Register of Historic Places nomination of the Uptown Tenderloin Historic District prepared in 2008 by architectural historians Michael Corbett and Anne Bloomfield. This document is available from the National Park Service, <https://npgallery.nps.gov/GetAsset/d55b533c-e490-4172-a748-d8e208d56035>, accessed July 18, 2017.

<sup>9</sup> Corbett, Michael and Anne Bloomfield, National Register of Historic Places, Supplementary Listing Record, <https://npgallery.nps.gov/GetAsset/d55b533c-e490-4172-a748-d8e208d56035>, accessed July 18, 2017.



During the 1906 earthquake and fire, over 521 city blocks (nearly five square miles) containing San Francisco's financial and commercial retail districts, as well as much of the wholesale goods, factory, and entertainment sections of the city, were destroyed. Seismic-induced liquefaction toppled buildings, ruptured gas and water mains, and upended stoves, boilers, and commercial ovens, sparking fires citywide. Refugees fled, and some portions of the city took decades to recover due to lack of economic means to rebuild, shaky investor confidence, and protracted debates over proposed changes to construction codes and regulations governing reconstruction. In the decades following the disaster, the Tenderloin gradually redeveloped with multi-story apartment hotels that were much larger than the single-family homes present in the area before 1906. Among the oldest buildings in the Tenderloin are the Cadillac Hotel at 366-394 Eddy Street and the Arlington Hotel at 468-488 Ellis Street, both built in 1907. The San Francisco's Red Light Abatement Act of 1917 suppressed prostitution in the Barbary Coast neighborhood, and this enduring institution relocated to the Tenderloin.<sup>10</sup>

After World War I, construction of high-density multi-floor apartment buildings and hotels accelerated. The Uptown Tenderloin Historic District, described below, includes many of these buildings, as these units were in high demand given the area's mostly transient population. In 1917, the San Francisco Real Estate Circular described Tenderloin apartments, saying, "... they are not, of course, well adapted to families with several children ... Childless couples, elderly people whose children have married and made homes of their own, and single persons form most of the tenants." The last of these apartment buildings was built in the Tenderloin in 1931.<sup>11</sup>

From the 1940s through the 1970s, the area retained its reputation for raucous nightlife and affordable housing. The neighborhood attracted many soldiers either stationed in San Francisco or on leave during World War II, the Korean War, and the Vietnam War. The Tenderloin's decline began in the

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<sup>10</sup> Ibid.

<sup>11</sup> Ibid.

late 1960s, as urban renewal efforts in other areas of the city displaced many low income residents who relocated in the Tenderloin. The Tenderloin's reputation as a place that catered to transience and illegal activity also attracted those with mental health and substance problems. The Tenderloin was bypassed during the "dotcom" boom of the 1990s and early 2000s and the area struggled with persistent crime. This characteristic persists and the Tenderloin remains an area with dense low-cost apartments and former conventional hotels converted into single-room occupancy (SRO) housing.<sup>12</sup>

Uptown Tenderloin Historic District Survey. The Uptown Tenderloin Historic District survey was prepared in 2008 (2008 Survey) by architectural historians Michael Corbett and Anne Bloomfield.<sup>13</sup> The survey identified a total of 409 contributing elements, mostly high-density residential buildings constructed between 1906 and 1957 on all or part of 33 city blocks roughly bounded by Market, McAllister, Golden Gate, Larkin, Geary, Taylor, Ellis, and Mason streets. The district also contains 68 noncontributing elements and was listed in the NRHP on February 5, 2009.

The most common contributing elements of the district are multi-story, multiple-unit, mixed-use wood-frame apartment buildings or SRO hotels that feature various architectural styles, such as Classical Revival, Beaux Arts, and Colonial Revival. The prevailing building footprint is rectangular to conform to the long, narrow parcels, which results in a uniform streetscape and varied cornice heights. The buildings are typically mixed-use with ground floor commercial, residential spaces in the upper floors, and minimal to no setback from the sidewalk. The upper floor residential areas typically have projecting bay windows spaced at regular intervals. Decorative façade details on ground floor commercial spaces are typically made of brick or cast stone, giving an impression of a building resting on a strong foundation. The upper floors are typically clad with horizontal lap wood siding or with textured stucco; they may be festooned with wood or cast-plaster decorative

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<sup>12</sup> Ibid.

<sup>13</sup> Corbett, Michael and Anne Bloomfield, National Register of Historic Places, Supplementary Listing Record, <https://npgallery.nps.gov/GetAsset/d55b533c-e490-4172-a748-d8e208d56035>, accessed July 18, 2017.

ornaments such as laurel wreaths, garlands, and cartouches. Doors and windows are framed with decorative wood surrounds.

Other character-defining features of built environment contributing elements within the district include:

- Three- to seven-story residential buildings;
- Brick or concrete exterior cladding;
- Double-hung wood-sash windows;
- Decorative quoining;
- Marble inlays;
- Sandstone columns, sills, and lintels; and
- Stamped Classical Revival-styled metal cornices.

The building on the project site lies outside a portion of the district's western boundary, which is formed by a two-block long segment of Larkin Street between Eddy Street and Golden Gate Avenue.

### **Project Site**

The following description is from the cultural resource surveys associated with the building on the project site at 500 Turk Street.

The building at 500 Turk Street was built in 1935 as an automobile tire and battery sales and service facility. The 2010 Survey describes tire stores in San Francisco as follows:

Rubber manufacturers began to make solid tires for carriages, wagons, and bicycles, and then pneumatic tires for bicycles and automobiles as the market for such developed. National businesses devoted primarily or entirely for manufacturing automobile tires emerged in the early 20th century. A few such had outlets in San Francisco as early as 1905. Following the 1906 earthquake and fire, three of four tires dealers in the city were in the study area. In 1914, there

were 37 tire dealers in the city, and 76 percent of them were in the study area. The percentage dipped as the numbers of dealers increased; for example, in 1929, over a third of the city's 100 tires dealers were in the study area.

Architectural Context. According to the 2010 Survey, the 2017 HRE, and the 2017 HRER, 500 Turk Street's notable features include its layout and design and its Art Deco architectural qualities. Each of these aspects is described below:

*Layout and Design.* Under Criterion 3 (architecture), the building on the project site at 500 Turk Street is most important for its plan. It represents a departure from the plan of automobile repair shops of the 1900s–1920s. These earlier auto repair shops conformed to the plan of other light industrial buildings of those decades, typically filling the entirety of their rectangular lots and requiring customers to drive their autos into the building for servicing. The building on the project site, by contrast, fills only a portion of its lot, leaving considerable outdoor space for maneuvering of automobiles and parking. The building itself is divided into wings, one of which was devoted to product sales and the other of which holds vehicle bays for servicing. Offices, it appears, were located at the junction of these two wings. In the design of this building, then, the architect and his client jettisoned the traditional model of an urban industrial building and chose instead to take into account the special needs of an auto servicing business (i.e., one that required outdoor maneuvering space and indoors service bays that were separated from auto sales). The Art Deco detailing on this building, though minimalist, gives the building sufficient flair to distinguish it from a purely functional building of this type.<sup>14</sup>

*Art Deco.* The building on the project site is an example of a restrained, minimalist application of the Art Deco architectural style.<sup>15</sup> The style was named after the Paris Exhibition of 1925, the Exposition

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<sup>14</sup> William Kostura, State of California Department of Parks and Recreation Form 523 for 500 Turk Street, January 2010.

<sup>15</sup> San Francisco Planning Department, *Historic Resource Evaluation Response, 500 Turk Street*, June 5, 2017.



Internationale de Arts Decoratifs et Industriels Modernes. The Art Deco style was a popular style in American commercial design from 1920 to the late 1930s.<sup>16</sup> Art Deco inspired elements on the project site building consist of:

- Smooth wall surfaces (typically stucco);
- Flat roof with short or no overhanging eaves and short parapets;
- Zigzags, chevrons, geometric patterns, and other repeating stylistic façade elements; and towers, layered pilasters, and similar vertical projections above the roofline for vertical emphasis.<sup>17</sup>

*Henry Anthony Minton.* The building on the project site at 500 Turk Street was designed by architect Henry Anthony Minton. According to information provided by the Pacific Coast Architecture Database, Minton operated an architectural firm with offices in San Francisco and Oakland.<sup>18</sup> He was a rather prolific architect and notable examples of his work are listed below:

- Bank of America, San Mateo Branch (demolished). Built circa 1932 at 2 East 3rd Avenue, San Mateo, California.
- Bank of Italy, Merced Branch. Built 1928 at 501 West Main Street, Merced, California.
- Bank of Italy, Salinas Branch (demolished). Built 1927 at a site now occupied by Bataan Park, Salinas, California.
- Liberty Bank, Mission Street Branch (demolished). Built on a site now occupied by San Francisco Honda, 10 South Van Ness Avenue (Block/Lot: 3506/004), San Francisco.

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<sup>16</sup> Virginia Savage McAlester, *A Field Guide to American Houses; The Definitive Guide to Identifying and Understanding America's Domestic Architecture*, 2013. Alfred A. Knopf, New York.

<sup>17</sup> Ibid.

<sup>18</sup> University of Washington, Pacific Coast Architecture Database, Henry A. Minton, Architect (Practice), 2015, <http://pcad.lib.washington.edu/firm/2811>, accessed July 18, 2017.

- Roman Catholic Archdiocese of San Francisco, Saint Brigid's Church Convent, San Francisco. Article 10 Landmark (#252).<sup>19</sup> Built 1930 at 2151 Van Ness Avenue (Block/Lot: 0575/015), San Francisco.
- Roman Catholic Archdiocese of San Francisco, Saint Cecilia's Church Parochial Residence, San Francisco. Built 1930 at 2555 17<sup>th</sup> Avenue (Block/Lot: 2418/004B), San Francisco.

Minton's work is not regarded as influential or otherwise notable in its application of the Art Deco style in San Francisco.<sup>20</sup>

*Leon Hagop Nishkian.* Structural engineer Leon Hagop Nishkian is a prominent figure who made significant contributions to San Francisco's built environment. The high demand for engineers to rebuild San Francisco after the 1906 Earthquake and Fire provided the opportunity to launch a career, which subsequently grew in the decades following the disaster. At the beginning of his career, Nishkian worked on public works projects for the city, ultimately becoming the consulting structural engineer for the city's building department. Subsequently, he entered private practice where he designed a number of buildings in the Van Ness Auto Row area. In the course of his prolific career, Nishkian worked on such high-profile projects as the San Francisco Bay Bridge and the Golden Gate Bridge. Leon Nishkian died in 1947, but his firm survives today as Nishkian Menninger and maintains a San Francisco office.<sup>21</sup>

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<sup>19</sup> Ordinance No. 263-06, adopted October 17, 2006, [http://sfplanninggis.org/docs/landmarks\\_and\\_districts/LM252.pdf](http://sfplanninggis.org/docs/landmarks_and_districts/LM252.pdf), accessed July 18, 2017.

<sup>20</sup> San Francisco Planning Department 2017 HRER; *San Francisco Modern Architecture and Landscape Design, 1935-1970: Historic Context Statement*, 2010.

<sup>21</sup> San Francisco Planning Department, *Historic Resource Evaluation Response, 500 Turk Street*, June 5, 2017; "Leon Hagop Nishkian" History and biographical information available online at: <http://www.nishkian.com/leon-hagop-nishkian>, accessed September 13, 2017.

### Adjacent Built Environment

West of the building on the project site is the Admiral Garage, built in 1924 at 550 Turk Street (Block/Lot: 0741/005). According to the 2017 HRER, this Classical Revival and Gothic Revival-styled building serves as a connection tying the building on the project site at 500 Turk Street to Van Ness Avenue, which is relevant to neighborhood context. This building was included and assessed in the 2010 Survey<sup>22</sup> that found the Admiral Garage appeared eligible for inclusion in the CRHR at the local level of significance under Criteria 1 (events) and 3 (architecture). The period of significance under Criterion 1 is 1924–1964, which encompasses the period of the building’s association with providing automotive support services. The period of significance under Criterion 3 is 1924, the year of its construction. Therefore, the Admiral Garage at 550 Turk Street qualifies as an “historical resource” under CEQA.

East of and across Larkin Street from the project site is the NRHP-listed Uptown Tenderloin Historic District. As described above, the district is predominately a collection of multi-story, multiple-unit, mixed-use wood-frame apartment buildings or SRO hotels that feature various architectural styles, such as Classical Revival, Beaux Arts, and Colonial Revival. Of the 409 total contributing elements identified in the 2008 Survey, five face the building on the project site at 500 Turk Street. These buildings are contributing elements to the district and qualify as “historical resources” under CEQA. None of these buildings are individually eligible or are listed Article 10 or 11 Landmark properties.

- St. Paul Apartments, 452-460 Larkin Street, Block/Lot: 0346/010. Three-story building constructed 1911.
- La Sonoma Apartments, 500-514 Larkin Street, Block/Lot: 0336/008. Seven-story building constructed 1913.

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<sup>22</sup> William Kostura, State of California Department of Parks and Recreation, *Form 523 for 500 Turk Street*, January 2010.

- 528-532 Larkin Street, Block/Lot: 0336/011. Six-story mixed-use building (ground floor retail with residential space above) constructed 1927.
- Taylor Apartments, 550 Larkin Street, Block/Lot: 0336/014. Six-story building with basement constructed 1925.
- Kosy Apartments, 556 Larkin Street, Block/Lot: 0336/014C. Six-story building with basement constructed 1925.

North of the building on the project site is the one- to two-story Phoenix Hotel, a reinforced masonry hotel built in 1956 at 601–605 Eddy Street (Block/Lot: 0742/012). Since the late 1980s, this 56-room hotel has been a magnet for musicians, celebrities, partygoers, and tourists. While this building's construction date and distinctive mid-century form exclude it from the historic district, its motel/hotel use is roughly consistent with historical land use patterns of the area.

South of the building on the project site is the Philip Burton Federal Building and U.S. Courthouse (Burton Building) built in 1964 at 450 Golden Gate Avenue (Block/Lot: 0764/023). The Burton Building occupies the entire block south of and across Turk Street from the project site. The 2017 HRER notes that while the Burton Building is not formally included within the San Francisco Civic Center Historic District, it is associated with that assemblage of institutional buildings. Facing opposite the project site, the Burton Building is a 21-story-tall wall of stone, metal, and glass. Pedestrian access along Turk Street is limited to a series of mid-block entries; otherwise the Burton Building basically turns its back to areas north of and across Turk Street.

### **Regulatory Framework**

This subsection describes the general procedures for historic resources in San Francisco followed by a discussion of relevant federal, state, and local laws and regulations that pertain to the identification and regulation of historic architectural resources. As described below, CEQA defines a “historical resource” as a resource that is:

- Listed in, or determined to be eligible by the State Historical Resources Commission for listing in the CRHR.<sup>23</sup>
- A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as historically or culturally significant unless the preponderance of evidence demonstrates otherwise.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant, provided the determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the following criteria for CRHR listing<sup>24</sup> and also retains sufficient integrity:
  1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
  2. Is associated with the lives of persons important in our past;
  3. 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
  4. Has yielded, or may be likely to yield, information important in prehistory or history).

Criteria for the NRHP specified in the Code of Federal Regulations (CFR) are similar to the CRHR, but are lettered A–D (36 CFR Part 60.4). Integrity is the ability of a resource to convey its significance; that is, the aspects of its character or use that distinguish its historical importance. Integrity

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<sup>23</sup> (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4850 et seq.)

<sup>24</sup> (Pub. Res. Code section 5024.1; Title 14 CCR section 4852)

encompasses seven aspects: location, design, materials, workmanship, setting, feeling, and association (Public Resources Code section 5024.1(b); 36 CFR Part 60.4).

Public Resources Code section 5024.1(g) sets forth guidelines for historic resource surveys, including, among other things, preparation of the survey according to Office of Historic Preservation procedures and listing the results in the State Historic Resources Inventory. In general, project-specific historic resource surveys performed as part of CEQA review in San Francisco will meet these guidelines and, therefore, resources identified as having California Historical Resource Status Codes 1 through 5 (denoting properties listed in, determined eligible for, or that appear eligible for listing in the CRHR; or properties recognized as historically significant by a local government) on such surveys will normally be determined to be historic resources for CEQA purposes.<sup>25</sup>

San Francisco contains approximately 175 properties listed in the NRHP well over a thousand buildings and structures listed in or eligible for listing in the CRHR, approximately 50 California State Historical Landmarks, approximately 266 locally designated historical landmarks, and 14 locally designated historic districts.

### **Federal**

National Register of Historic Places. The NRHP is the nation's master inventory of cultural resources worthy of preservation. It is administered by the National Park Service, which is represented at the state level by the state historic preservation officer. The NRHP includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the federal, state, or local level. Resources that are listed on or have been found by the state historic preservation officer to be eligible to the NRHP are called historic properties. The NRHP includes four evaluative criteria to determine eligibility of a historic property.

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<sup>25</sup> Status Code 1 denotes properties listed in the National and/or California register(s); Status Code 2 indicates a property has been determined eligible for listing; Status Codes 3 and 4 indicate a property "appears eligible" for listing; and Status Code 5 denotes a property recognized as historically important by a local government agency.

The quality of significance in American history, architecture, archaeology and culture is present in districts, sites, buildings, structures, and objects of state and local importance that possess integrity of location, design, setting, materials, workmanship, feeling and association, and:

- a. that are associated with events that have made a significant contribution to the broad patterns of history; or
- b. that are associated with the lives of persons significant in our past; or
- c. that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- d. that have yielded or may likely yield information important in prehistory or history.

Although there are exceptions, certain kinds of resources are not usually considered for listing in the NRHP: religious properties, moved properties, birthplaces and graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years.

In addition to qualifying for listing under at least one of the evaluative criteria of the NRHP, a property must possess sufficient integrity to be considered eligible for inclusion in the NRHP. According to National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation, integrity is defined as “the ability of a property to convey its significance.”<sup>26</sup> The National Register Bulletin defines seven characteristics of integrity as follows:

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<sup>26</sup> National Park Service, National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation, 1997:44.

1. *Location* is the place where the historic property was constructed;
2. *Design* is the combination of elements that create the form, plans, space, structure and style of the property;
3. *Setting* addresses the physical environment of the historic property inclusive of the landscape and spatial relationships of the buildings;
4. *Materials* refer to the physical elements that were combined or deposited during a particular period of time and in a particular pattern of configuration to form the historic property;
5. *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period in history;
6. *Feeling* is the property's expression of the aesthetic or historic sense of a particular period of time; and
7. *Association* is the direct link between an important historic event or person and a historic property.

According to National Register Bulletin 15, “[t]o retain historic integrity a property will always possess several, and usually most, of the aspects.”<sup>27</sup>

### **State**

California Environmental Quality Act (CEQA). CEQA applies to all discretionary projects undertaken or subject to approval by the State’s public agencies.<sup>28</sup> CEQA states that it is the policy of the State of California to “take all action necessary to provide the people of this state with ... historic environmental qualities ... and preserve for future generations examples of the major periods of California

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<sup>27</sup> Ibid.

<sup>28</sup> California Code of Regulations (CCR) 14(3) section 15002(i).



history.”<sup>29</sup> Under the provisions of CEQA, “A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.”<sup>30</sup> CEQA thus requires that historic resources be taken into consideration during the planning process.<sup>31</sup> If feasible, adverse effects to the significance of historic resources must be avoided, or the effects mitigated.<sup>32</sup>

CEQA Guidelines section 15064.5(a) defines a “historical resource” as a resource which meets one or more of the following criteria:

- Listed in, or determined eligible for listing in, the California Register by the State Historical Resources Commission;
- Listed in a local register of historical resources (as defined at Public Resources Code (PRC) section 5020.1(k));
- Identified as significant in a historical resource survey meeting the requirements of PRC section 5024.1(g); or
- Determined to be a historical resource by a project’s lead agency.<sup>33</sup>

A historic resource consists of: “Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California ... Generally, a resource shall be considered by the lead agency to be

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<sup>29</sup> Public Resources Code (PRC) section 21001(b), (c).

<sup>30</sup> CCR 14(3) section 15064.5(b).

<sup>31</sup> CCR 14(3) section 15064.5; PRC section 21083.2.

<sup>32</sup> CCR 14(3) section 15064.5(b)(4).

<sup>33</sup> CCR 14(3) section 15064.5(a).

'historically significant' if the resource meets the criteria for listing in the California Register of Historical Resources."<sup>34</sup>

A "substantial adverse change" is defined by CEQA Guidelines section 15064.5 as "demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." The significance of a historic resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of a historic resource that convey its historical significance and that justify its inclusion in or eligibility for inclusion in the CRHR, certain local registers, or certain historic resource surveys.

California Public Resources Code: California Register of Historical Resources. The CRHR is established at California Public Resources Code section 5024.1. The CRHR is a guide to cultural resources that must be considered when a government agency undertakes a discretionary action subject to CEQA. The CRHR helps government agencies identify and evaluate California's historic resources, and indicates which properties are to be protected, to the extent prudent and feasible, from substantial adverse change.<sup>35</sup> Any resource listed in, or eligible for listing in, the CRHR is to be considered during the CEQA process.

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;

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<sup>34</sup> California Code of Regulations 14(3) Section 15064.5(a)(3).

<sup>35</sup> Public Resources Code section 5024.1(a).

- 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.

In addition to meeting one or more of the above criteria, the CRHR requires that sufficient time must have passed to allow a “scholarly perspective on the events or individuals associated with the resource.” Fifty years is used as a general estimate of the time needed to understand the historical importance of a resource.<sup>36</sup> In order to protect potential resources, the State of California Office of Historic Preservation recommends documenting, and taking into consideration in the planning process, any cultural resource that is 45 years or older.<sup>37</sup>

The CRHR also requires a resource to possess integrity, which is defined as “the authenticity of a historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association.”<sup>38</sup> These seven aspects of integrity are the same as the seven aspects previously described in this section.

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<sup>36</sup> CCR 14(11.5) section 4852 (d)(2).

<sup>37</sup> California Office of Historic Preservation, *Instructions for Recording Historical Resources*, March 1995, <http://www.ohp.parks.ca.gov/pages/1054/files/manual95.pdf>, accessed July 18, 2017. The 45-year criterion is in place to account for a projected five-year interval between resource identification and planning decisions. The criterion ensures that resources that will reach the age requirement in the interim are fully considered during the environmental review and decision-making processes.

<sup>38</sup> California Office of Historic Preservation, *California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register)*, Technical Assistance Series #6, N.D., 2011, <http://ohp.parks.ca.gov/pages/1069/files/technical%20assistance%20bulletin%206%202011%20update.pdf>, accessed July 18, 2017.

## Local

San Francisco General Plan. The general plan objectives and policies applicable to historic preservation include the following from the Urban Design Element:

- *Objective 2*: Conservation of resources which provide a sense of nature, continuity with the past, and freedom from overcrowding.
- *Policy 2.4*: Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development.
- *Policy 2.5*: Use care in remodeling of older buildings, in order to enhance rather than weaken the original character of such buildings.
- *Policy 2.6*: Respect the character of older development nearby in the design of new buildings.

As set forth in Chapter III, Plans and Policies, pp. 33–42, of this draft EIR, the Accountable Planning Initiative (Proposition M of 1986) added eight priority policies to the planning code and to the preamble to the general plan that “shall be the basis upon which inconsistencies in the General Plan are resolved” (Planning Code section 101.1). Priority policy 7 is “that landmarks and historic buildings be preserved.” As noted in Chapter III, Plans and Policies, pp. 40-41, demolition of the building on the project site could be inconsistent with the priority policy 7 (preservation of landmarks and historic buildings). However, city decision-makers, in consideration of the proposed project’s general plan consistency, will evaluate all relevant general plan objectives and policies, including, for example, those that address the provision of affordable housing, promotion of neighborhood-serving retail uses, and that discourage the use of commuter automobiles. City decision-makers will evaluate whether the project would be, on balance, consistent with the general plan, including the eight priority policies added by the Accountable Planning Initiative. Inconsistency with a particular general plan policy does not indicate that a project is inconsistent with the general plan as a whole, nor does such a policy conflict, in and of itself, represent a significant adverse effect on the environment, although it may serve as an indicator that such effect could arise.

### **Local Registers of Historic Resources**

The San Francisco Planning Department considers a listing of historic resources approved by ordinance or via resolution of the board of supervisors or the planning commission to be a local register of historic resources for the purposes of CEQA.

Here Today. Here Today was the earliest survey completed by the Junior League of San Francisco. Adopted by the board of supervisors under Resolution No. 268-70, Here Today documents approximately 2,500 properties within the City and County of San Francisco. The survey files are located in the history center at the main branch of the San Francisco Public Library. Generally, Here Today focuses on buildings and structures of conspicuous architectural quality – primarily public buildings and notable private properties. No features or buildings on the project site were identified in Here Today.

1976 Citywide Architectural Survey. In 1974, as the American Bicentennial was approaching, the San Francisco Planning Department began a citywide survey of architecturally significant buildings. The survey generated an inventory, which grew to over 10,000 properties. This survey was primarily a visual inventory of urban design quality and did not consider cultural or historical significance. The inventory assigned numerical ratings between “-2” (Detrimental) and “5” (Extraordinary) that assessed various architectural and design criteria of each building. The unpublished survey, consisting of 60 volumes of data, is on file at the planning department. When completed, the 1976 Architectural Survey was considered to represent 10 percent of the city’s building inventory. The survey was adopted by the board of supervisors under Resolution No. 7831 in 1977, and the planning department has been directed to use it, although the methodology is inconsistent with current CEQA Guidelines PRC 5024.1(g).

No features or buildings on the project site were identified in the 1976 Architectural Survey.

San Francisco Architectural Heritage. San Francisco Architectural Heritage (Heritage) is the oldest non-profit organization in San Francisco dedicated to educating the public about historic resources and advocating for their preservation. Heritage has sponsored several historic resource inventories of

various neighborhoods throughout the city. The earliest of these was the Downtown Survey, completed in 1978 by Michael Corbett, and subsequently published in 1979 as *Splendid Survivors*. The *Splendid Survivors* inventory became the basis of Article 11 of the Downtown Area Plan (see below).

No features or buildings on the project site were identified in *Splendid Survivors*.

San Francisco City Landmarks (“Article 10 Resources”). San Francisco City Landmarks are buildings, properties, structures, sites, districts, and objects that possess “special character or special historical, architectural or aesthetic interest or value and that are an important part of the city’s historical and architectural heritage.”<sup>39</sup> City Landmarks are important to San Francisco’s history and are significant and unique examples of the past. Adopted in 1967 as Article 10 of the planning code, City Landmarks are protected from inappropriate alterations and demolitions, with all significant alterations reviewed by the historic preservation commission. As of June 2014, there are 266 landmark sites, 11 historic districts, and nine structures of merit in San Francisco subject to Article 10.

There are no Article 10 landmarks or structures of merit on the project site, nor is the project site located within an Article 10 historic district.

San Francisco Planning Code Designation (“Article 11 Resources”). Article 11 of the planning code implements the preservation policies of the Downtown Area Plan. It identifies Significant and Contributory buildings and Conservation Districts in the city’s C-3 districts and establishes standards and procedures for review of alterations to buildings designated under Article 11.

The 500 Turk Street building is not within or adjacent to any identified Conservation District designated under Article 11 of the planning code.

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<sup>39</sup> San Francisco Planning Department, *San Francisco Preservation Bulletins Numbers 1-21*, May 2004, <http://sf-planning.org/historic-preservation-bulletins>, accessed July 18, 2017.

San Francisco Planning Department Preservation Bulletin 16.<sup>40</sup> The San Francisco Planning Department has issued a Preservation Bulletin (No. 16), titled “San Francisco Planning Department CEQA Review Procedures for Historic Resources,” which integrates the CEQA Guidelines into the city’s existing regulatory framework. As a certified local government and CEQA lead agency for the City and County of San Francisco, the planning department has instituted guidelines and a system for CEQA review of historic resources. The planning department has established the categories for use in determining the significance of historic resources, based upon their evaluation and inclusion in specific registers or surveys:

- **Category A: Historic resources** (divided into two sub-categories):
  - *Category A.1:* Resources listed on or formally determined to be eligible for the CRHR. These properties will be evaluated as historic resources for the purposes of CEQA. Only a change in the property’s status as listed in, or determined to be eligible for listing in, the CRHR by the California Historic Resources Commission will preclude evaluation of the property as a historical resource under CEQA.
  - *Category A.2:* Adopted local registers, and properties that have been determined to appear or may become eligible, for the CRHR. These properties will be evaluated as historical resources for purposes of CEQA. Only a preponderance of the evidence demonstrating that the resource is not historically or culturally significant will preclude evaluation of the property as a historical resource. In the case of Category A.2, resources included in an adopted survey or local register, the “preponderance of the evidence” must generally consist of evidence that the appropriate decision-maker has determined that the resource should no longer be included in the adopted survey or register. Substantiated and uncontroverted evidence of an error in professional

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<sup>40</sup> San Francisco Planning Department, *San Francisco Preservation Bulletin No. 16: CEQA Review Procedures for Historic Resources*, March 31, 2008, <http://sf-planning.org/sites/default/files/FileCenter/Documents/5340-PresBulletin16CEQA.pdf>, accessed July 18, 2017.

judgment or a clear mistake, or destruction of the property may also be considered a “preponderance of the evidence that the property is not an historic resource.”

- **Category B: Properties requiring further consultation and review.** Category B includes properties that do not meet the criteria for listing in Categories A.1 or A.2, but for which the City has information indicating that further consultation and review will be required to evaluate whether a property is a historical resource for the purposes of CEQA.
- **Category C:** Category C includes properties that have been affirmatively determined not to be historical resources, properties less than 50 years of age, and properties for which the City has no information.

The building on the project site, the Kahn and Keville tire and batteries shop at 500 Turk Street, has a San Francisco Planning Department Historic Resource Status Code of “A – Historic Resource Present” based on the 2010 Survey.<sup>41</sup>

### **Historical Significance of 500 Turk Street**

The 2010 Survey<sup>42</sup> and 2017 HRE<sup>43</sup> evaluated 500 Turk Street under the eligibility criteria for the CRHR and found that the building on the project site appears individually eligible for inclusion in the CRHR under Criteria 1 and 3. The planning department's 2017 HRER concurs with those findings. As explained in the 2017 HRER, the area surrounding the project site does not exhibit cohesiveness of building type, style, size, age, or function, and thus does not qualify as a potential eligible historic district under any criteria. This is consistent with the findings in the 2010 Survey (see above). Therefore, for purposes of this draft EIR, the building on the project site is a historic resource under CEQA because it appears to be individually eligible for inclusion in the CRHR.

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<sup>41</sup> San Francisco Planning Department, *San Francisco Property Information Map*, <http://propertymap.sfplanning.org>, accessed July 18, 2017.

<sup>42</sup> William Kostura, State of California Department of Parks and Recreation Form 523 for 500 Turk Street, January 2010.

<sup>43</sup> Left Coast Architectural History, *Historic Resource Evaluation, Part 2 –Alternatives Analysis*, June 20, 2017.



The evaluation of the building on the project site at 500 Turk Street is described below.<sup>44</sup>

**Criterion 1: Associated with Events That Have Made a Significant Contribution to the Broad Patterns of California’s History and Cultural Heritage (Events)**

At the time of the 1906 earthquake and fire, the subject property contained a group of masonry buildings devoted to residential, commercial, and light industrial uses. This group was demolished in the conflagration, and the site remained largely vacant for the next 29 years, the only occupant having been a small, apparently temporary structure on the corner that may have housed a saloon. The subject building was constructed in 1935, at a time when much of the surrounding area had already been rebuilt with apartment buildings, hotels, and automotive structures.

The adopted 2010 Survey, which lists longevity of use as one of the qualities that was assessed to determine significance, notes that “[t]he first and only occupant of this building has been Kahn and Keville, dealers in tires, auto batteries, and appliances from 1935 to the present.” The 2010 Survey provides the following evaluation under Criterion 1:

Completed in 1935, this is a moderately late example of an automobile tire and battery shop. With [82] years of such use in its history... it has good to excellent longevity in this use. Although this building was not one of the earlier examples of a building that had such uses, it had these uses for longer than almost any other building, and has extremely high integrity. It is also clear that Kahn and Keville were major tire dealers in San Francisco, specializing in Goodyear practically from their founding.

The 2017 HRER noted the creation and stewardship of the marquee sign at the corner and included the sign as a contributing feature (see below), in part because the sign has become a fixture of the

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<sup>44</sup> San Francisco Planning Department, *Historic Resource Evaluation Response, 500 Turk Street*, June 5, 2017.

neighborhood, featuring a rotating assortment of quotations, commentary on current events, and witticisms.

The building on the project site at 500 Turk Street appears individually eligible for listing in the CRHR under Criterion 1 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, it is specifically significant for the longevity of its use as a tire and battery shop.

**Criterion 2: Associated with the Lives of Persons Important in Our Past (Persons)**

The Kahn & Keville tire and battery business moved into the project site building after its construction and remains at its current location to the present. Neither Kahn nor Keville appear to be important to the local, regional, or national past such that the subject property with which they are associated is significant under Criterion 2. Their single greatest contribution appears to have been their sustained ownership and operation of their tire shop; the significance of the longevity of that stewardship is assessed separately under CRHR Criterion 1. For these reasons the building on the project site does not appear eligible for inclusion in the CRHR under Criterion 2.

**Criterion 3: Embodies the Distinctive Characteristics of a Type, Period, or Method of Construction, or Represents the Work of an Important Creative Individual, or Possesses High Artistic Values (Architecture)**

The building on the project site appears eligible for individual inclusion in the CRHR under Criterion 3 for its innovative design. It represents a departure from the plan of automobile repair shops of the 1900s–1920s, as these earlier auto repair shops conformed to the plan of other light industrial buildings [sic] of those decades, typically filling the entirety of their rectangular lots and requiring customers to drive their autos into the building for servicing. The building on the project site, by contrast, fills only a portion of its lot, leaving considerable outdoor space for maneuvering of automobiles and parking. The building itself is divided into wings, one devoted to product sales and the other holding vehicle bays for servicing. Offices were located at the junction of these two wings. The design of this building eschewed the traditional model of an urban industrial building and

instead took into account the special needs of an auto servicing business (i.e., one that required outdoor maneuvering space and indoors service bays that were separated from auto sales). The Art Deco detailing on this building, though minimalist, gives the building sufficient flair to distinguish it from a purely functional building of this type. 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.

Although architect Henry Minton and structural engineer Leon Hagop Nishkian are distinguished within their respective fields of expertise, as explained in the 2017 HRER, they are better known for their work on other buildings, such as the Roman Catholic Church and Golden Gate Bridge, respectively.<sup>45</sup>

**Criterion 4: Has Yielded, or May be Likely to Yield, Information Important in Prehistory or History (Information Potential)**

The building on the project site does not appear significant under Criterion 4, which is typically associated with archaeological resources. In some circumstances, Criterion 4 applies to rare construction types when involving the built environment. The subject property, however, is not an example of a rare construction type. For these reasons the building on the project site does not appear eligible for inclusion in the CRHR under Criterion 4.

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<sup>45</sup> Per the Planning Department 2017 HRER: [Henry] Minton's portfolio includes numerous residences as well as docks and buildings for the auxiliary water-supply system. He is best known for his work for the Bank of Italy and the Roman Catholic Church. Nishkian, at the beginning of his career, worked on public works projects for the City for several years, ultimately attaining the title of Consulting Structural Engineer for the City of San Francisco Building Department. Subsequently he entered private practice where he designed a number of buildings in the Van Ness Auto Row area. In the course of his extremely prolific career—he is described in the Van Ness Auto Row Survey as "one of San Francisco's two most prominent structural engineers during the 1920s-1940s." Nishkian worked on such high-profile projects as the San Francisco Bay Bridge and the Golden Gate Bridge.

### Character-Defining Features

The character-defining features of the subject property that conveys its significance under CRHR Criteria 1 and 3 include the following:

- Building footprint consisting of two perpendicular wings of unequal length that meet at the northwest corner;
- Open vehicle maneuvering area at the southeast corner;
- Height; one-story wings, with a central second-story portion;
- Storefront infill on the street façades and east facade of the Turk Street Wing; vehicular bays on the south façade of the Larkin Street Wing;
- Art Deco styling, including faceted piers and vertical hash marks in the fascia;
- Steel sash windows; and
- Signage, including two diamond-shaped Goodyear Tire signs mounted on the roof, and one marquee sign at the corner featuring rotating content.<sup>46</sup>

### Integrity of 500 Turk Street

Although the building on the project site has undergone a number of alterations since it was originally constructed—infill of select storefronts, removal of gas pumps, change of signage, loss of some detailed ornament, addition of roll-down shop doors—few of these alterations have had an adverse impact on the building’s character-defining features. The 2017 HRER found that the building on the project site retains sufficient integrity to convey its significance as an Art Deco-style automobile service building with a distinctive, innovative plan that facilitates vehicular movement.<sup>47</sup>

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<sup>46</sup> San Francisco Planning Department, *Historic Resource Evaluation Response, 500 Turk Street*, June 5, 2017.

<sup>47</sup> *Ibid.*

## Impacts and Mitigation Measures

### Significance Criteria

The thresholds for determining the significance of impacts in this analysis are consistent with the environmental checklist in Appendix G of the state CEQA Guidelines, which has been adopted and modified by the San Francisco Planning Department. For the purposes of this analysis, the following applicable threshold was used to determine whether implementation of the project would result in a significant impact to historic architectural resources. Implementation of the proposed project would have a significant effect on a historic architectural resource if it would:

- Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines section 15064.5, including those resources in Article 10 or Article 11 of the San Francisco Planning Code.

A “substantial adverse change” is defined by CEQA Guidelines section 15064.5 as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.” The significance of a historical resource is “materially impaired,” according to CEQA Guidelines section 15064.5(b)(2), when a project “demolishes or materially alters in an adverse manner those physical characteristics” of the resource that:

- (A) Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- (B) Account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

- (C) Convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

In general, a project that would comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties, including the Standards for Rehabilitation (Secretary's Standards) is considered to have mitigated its impact to a less-than-significant level (CEQA Guidelines section 15064.5(b)(3)). The Secretary's Standards are as follows:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

CEQA Guidelines section 15126.4(b)(2) states that, "In some circumstances, documentation of a historical resource, by way of historic narrative, photographs or architectural drawings, as mitigation for the effects of demolition of the resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur." In such cases, the demolition or substantial alteration of a historic resource would remain a significant and unavoidable impact on the environment even after the historical documentation has been completed.

Fragile structures, especially older masonry structures, can be damaged by vibration. For construction-generated vibration impacts, the Federal Transit Administration (FTA) has developed criteria for judging the significance of vibration produced by construction equipment. The FTA establishes the following standards to prevent architectural damage: (1) 0.5 in/sec peak particle velocity (PPV) for reinforced concrete, steel, or timber (no plaster) construction and (2) 0.2 in/sec PPV

for fragile buildings (i.e., non-engineered timber or masonry structures).<sup>48</sup> These criteria are used as the thresholds of significance for vibration impacts in this EIR.<sup>49</sup>

### **Approach to Analysis**

This section is based on the 2010 Survey, the 2017 HRE, and the 2017 HRER. As summarized in the setting section above, these studies included extensive background research to identify historic resources, field review, resource recordation, and visual analysis by a qualified architectural historian. As discussed, the building on the project site at 500 Turk Street appears *individually* eligible for listing in the CRHR under Criterion 1 (Events) for its association with the development of a collection of businesses on and around Van Ness Avenue that catered to the automobile industry and under Criterion 3 (Architecture) for its innovative design. Within this context, it is specifically significant for the longevity of its use as a tire and battery shop.

Under CEQA's two-step analysis of historic resources, the preceding discussion has identified an individual historic resource on the project site. The analysis below focuses on potential impacts to this resource that would result with development of the proposed project.

### **Historic Architectural Resources Impacts**

The discussion below analyzes the impacts of the proposed project that are related to historic architectural resources.

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<sup>48</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006, [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA\\_Noise\\_and\\_Vibration\\_Manual.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf), accessed June 23, 2017; see Table 12-3, p. 12–13. Although part of a larger manual that primarily assesses noise and vibration from transit operations, the FTA construction vibration standards are generally relevant to any construction project using heavy equipment.

<sup>49</sup> PPV is defined as the maximum instantaneous peak of the vibration signal in inches per second (in/sec).



**Impact CR-1: The proposed project would cause a substantial adverse change in the significance of the Kahn and Keville Building located at 500 Turk Street, a historic resource as defined by CEQA Guidelines section 15064.5(b). (significant and unavoidable with mitigation)**

To implement the proposed project, the 500 Turk Street building would be demolished. As discussed, that building appears individually eligible for listing in the CRHR under Criterion 1 (Events) and Criterion 3 (Architecture), as one of the commercial buildings associated with a collection of automotive-related businesses located along Van Ness Avenue and adjacent side streets that were constructed in the immediate aftermath of the 1906 earthquake and fire. The 500 Turk Street building was designed to meet the specific needs of the automotive business it was meant to house by providing an area in front of the building facilitates that vehicular movement and for its Art Deco architectural qualities. Demolition of the existing 500 Turk Street building would materially impair the significance of the historic resource and, as such, would cause a substantial adverse impact on a historic resource and would be considered a significant impact under CEQA.<sup>50</sup>

Implementation of the following mitigation measures would lessen the impact of the proposed demolition of 500 Turk Street building through documentation, salvage, and public outreach through an interpretive display and video presentation. This documentation and outreach would highlight the resource's individual importance and the historical context of automotive-related businesses along Van Ness Avenue and adjacent side streets. However, these mitigation measures would not reduce this impact to a less-than-significant level:

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<sup>50</sup> Chapter VI, Alternatives, pp. 103–132, presents a range of alternatives that would meet most of the basic project objectives and could avoid or substantially lessen significant effects of demolition under the proposed project. The Alternatives chapter includes discussion of three alternatives, the Full Preservation Alternative, the Partial Preservation Alternative, which would retain, in whole or in part, the existing 500 Turk Street building. The third alternative discussed is the No Project Alternative.

Mitigation Measure M-CR-1a: Documentation. Prior to the issuance of demolition or site permits, the project sponsor shall undertake Historic American Building Survey (HABS)-level documentation of the subject property, structures, objects, materials, and landscaping. The documentation shall be funded by the project sponsor and undertaken by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate), as set forth by the Secretary of the Interior's Professional Qualification Standards (36 CFR, Part 61). The professional overseeing the documentation shall meet with the planning department staff for review and approval of a coordinated documentation plan before work on any one aspect may commence. The documentation shall consist of the following:

- *Measured Drawings:* A set of measured drawings that depict the existing size, scale, and dimension of the subject property. The planning department preservation staff will accept the original architectural drawings or an as-built set of architectural drawings (plan, section, elevation, etc.). The planning department preservation staff will assist the consultant in determining the appropriate level of measured drawings;
- *HABS-Level Photography:* Digital photographs of the interior and the exterior of subject property. Large format negatives are not required. The scope of the digital photographs shall be reviewed by planning department preservation staff for concurrence, and all digital photography shall be conducted according to current National Park Service Standards. The photography shall be undertaken by a qualified professional with demonstrated experience in HABS photography; and
- *HABS Historical Report:* A written historical narrative and report, per HABS Historical Report Guidelines.
- *Video Recordation of the Historic Resource:* Digital video recordation shall be undertaken prior to the issuance of demolition or site permits. The project sponsor shall undertake video documentation of the affected historic resource and its setting. The video recordation will be scoped with and approved by planning department preservation staff prior to issuance of a site permit. The documentation shall be conducted and narrated by a qualified professional who meets the standards for history, architectural history, or

architecture (as appropriate) set forth by the Secretary of the Interior's Professional Qualification Standards (36 Code of Federal Regulations, Part 61). The documentation shall include as much information as possible—using visuals in combination with narration—about the materials, construction methods, current condition, historic use, and historic context of the historic resource.

The professional(s) shall prepare the documentation and the planning department shall monitor its preparation. The professional(s) shall submit the completed documentation for review and approval by a planning department preservation staff before issuance of building permits. The final approved documentation shall be provided to the planning department and offered to repositories including, but not limited to, the San Francisco Public Library, the Environmental Design Library at the University of California, Berkeley, the Northwest Information Center, San Francisco Architectural Heritage, and the California Historical Society.

Further, a softcover book shall be produced that includes the content from the historical report, historical photographs, HABS photography, and measured drawings. The book shall be made available to the public for distribution.

Mitigation Measure M-CR-1b: Interpretive Display. The project sponsor shall provide a permanent display concerning the history of the Kahn and Keville building at 500 Turk Street and the historical context of automotive-related businesses along Van Ness Avenue and adjacent side streets. Interpretation of the building's history shall be supervised by an architectural historian who meets the Secretary of the Interior's Professional Qualification Standards. The interpretative materials (which may include, but are not limited to, a commemorative marker or plaque, a display of photographs, and/or news articles) shall be placed in a publicly accessible location on the project site. The interpretive display required by this mitigation measure shall refer the public to the video presentation required under Mitigation Measure M-CR-1a.

The interpretive material(s) shall be installed within the project site boundaries and made of durable all-weather materials. The interpretive material(s) shall be of high quality and installed

to allow for high public visibility. The content, materials, and appearance of the interpretive material(s) shall be developed by a consultant experienced in urban architectural interpretive displays, and shall be done in consultation with planning department preservation staff.

A proposal describing the general parameters of the interpretive program shall be approved by planning department preservation staff prior to issuance of a site permit. The substance, media, and other characteristics of such interpretive display shall be approved by planning department preservation staff prior to issuance of a final certificate of occupancy.

Mitigation Measure M-CR-1c: Salvage. The sponsor shall make an effort to incorporate the subject property's character-defining historical signage into the architecture of the new building that will be constructed on the site. If this proves infeasible or otherwise undesirable, the sponsor shall attempt to donate the historical signage to a historical organization.

**Impact CR-2: The construction of the proposed new building on the project site would not have a substantial adverse effect on any identified or potential off-site historic resources as defined in CEQA Guidelines section 15064.5 in the vicinity of the project site. (less than significant)**

The project site is not within an identified or potential historic district. The project site is adjacent to the Uptown Tenderloin Historic District and a potential Tenderloin LGBTQ Historic District.<sup>51</sup>

As discussed above, there are no locally designated individual or historic district resources under Article 10 within the project block and surrounding blocks. Several nearby potential historic

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<sup>51</sup> According to the Response to Comments document for the 1028 Market Street Project, the "Tenderloin LGBTQ Historic District" has been identified by the planning department. The boundaries of the district follow those of the 2009 Uptown Tenderloin National Register Historic District and the 2004 Market Street Theatre and Loft National Register Historic District and would possibly expand east and west to capture sites identified in the Citywide Lesbian, Gay, Bisexual, Transgender, and Queer Historic Context Statement. San Francisco Planning Department, Response To Comments, 1028 Market Street Project, January 13, 2017. A copy of this document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2014.0241E.

buildings are identified in the adopted 2010 Survey.<sup>52</sup> The project site is also in the vicinity of several buildings that are over 50 years in age which have been identified by the planning department as historic resources (Category A – Historic Resource Present) and potential historic resources (Category B – Properties Requiring Further Consultation and Review). For the purposes of this evaluation of potential impacts on nearby off-site historic resources resulting from the proposed project, these Category A and Category B properties are assumed to be eligible for inclusion in the CRHR and therefore considered historic resources under CEQA Guidelines section 15064.5(a)(3).

### **Vibration Impacts to Off-Site Resources**

The proposed project would not result in a direct physical impact to off-site historic resources due to construction-related groundborne vibration. As discussed in Section H.5, Noise of the NOP/IS, p. 76, 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 on properties adjacent to the project site. No pile driving, blasting, or substantial levels of excavation or grading activities are proposed; however, the project could include drilled displacement columns and geopiers, and rapid impact compaction could be utilized to densify the soil prior to foundation installation. Use of rapid impact compaction is considered a low vibration compaction method, as this method produces reduced vibration levels compared to other impaction techniques. The rapid impact compaction would be applied in a controlled manner, which would limit the risk of exceeding target vibration levels, making it possible to work closer to existing buildings without resulting in structural damage.

Since the proposed project would use standard construction equipment and would not include activities such as pile driving, the vibration impact would be temporary and would not be excessive. Typically, groundborne vibration generated by construction equipment attenuates rapidly with distance from the source of the vibration, further reducing any potential impact, and no other historic

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<sup>52</sup> Kostura, 2010, op. cit.

resources are closer to the project site than approximately 65 feet (the distance to 500–528 Larkin Street and 528–532 Larkin Street, which are buildings identified as contributors to the Uptown Tenderloin Historic District; and 550 Turk Street, which is identified in the 2010 Survey as individually eligible for the CRHR). Therefore, the proposed project would result in a less-than-significant impact to off-site historic resources with respect to excessive groundborne vibration during construction. In addition, because minimal excavation is anticipated during construction, adjacent properties are not anticipated to require shoring or underpinning. Thus, groundborne vibration from the types of equipment that would be used for construction of the proposed project would not be expected to result in damage to buildings. Therefore, the potential impact to off-site historic resources from groundborne vibration from construction would be less than significant.

#### **Uptown Tenderloin Historic District**

The proposed project would be constructed proximate to several other off-site buildings that are individual historic resources and/or contributors to the Uptown Tenderloin Historic District. The proposed project would not materially impair any of these resources, as construction and operation of the project would be limited to the project site, but the project could have an indirect impact on these nearby off-site historic resources by altering the existing visual setting of the area. However, to the extent that the Uptown Tenderloin Historic District is made up of individual buildings that are architecturally related but spatially separated from one another, visual continuity of the buildings and uniformity with neighborhood buildings are not factors in determining the significance of the district. The integrity and significance of the other nearby historic resources are also not premised on their possessing an intact visual setting or a cohesive relationship with their surroundings. Rather, the visual setting of these resources has been transformed by nearby development constructed within the past 50 years, particularly the 21-story Burton Building built in 1964 at 450 Golden Gate Avenue.

For these and other reasons (e.g., the relatively modest height of the proposed building), the proposed project would not result in a substantial adverse change in the significance of an adjacent historic resource (i.e., the project would not demolish or materially alter in an adverse manner those physical characteristics of an adjacent historic resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR (CEQA Guidelines section 15064.5(b)(2)(C)).

Implementation of the proposed project would, therefore, have no substantial effect on an off-site historic resource under CEQA, and the proposed project's indirect impact on off-site historic resources in the vicinity would thus be less than significant. No mitigation measures are required.

### **Cumulative Impact Evaluation**

**Impact C-CR-1: The proposed project, in combination with other past, present and reasonably foreseeable future projects in the project vicinity, could result in a cumulatively considerable contribution to a significant cumulative impact on a historic architectural resource. (*significant and unavoidable with mitigation*)**

This draft EIR conservatively assumes that the historic architectural resource impacts of proposed project could combine with future city projects to result in a significant cumulative impact on historic architectural resources. **Table IV-1**, p. 49, and **Figure IV-1**, p. 50, list and depict cumulative projects within 0.25 miles of the project site.

Based on online information reviewed via the San Francisco Property Information Map, the cumulative projects that would entail the demolition of buildings that are known historic resources or potential historic resources under CEQA include 719 Larkin Street, 469 Eddy Street, and 135 Hyde Street, all of which are contributors to the Uptown Tenderloin Historic District,<sup>53</sup> which, again, does

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<sup>53</sup> National Register of Historic Places nomination of the Uptown Tenderloin Historic District prepared in 2008 by architectural historians Michael Corbett and Anne Bloomfield. This document is available from the National Park Service, <https://npgallery.nps.gov/GetAsset/d55b533c-e490-4172-a748-d8e208d56035>, accessed July 18, 2017.

not include the project site at 500 Turk Street. Based on information from the San Francisco Property Information Map,<sup>54</sup> 430 Eddy Street, 145 Leavenworth Street, and 519 Ellis Street have been identified by the planning department as Category A – Historic Resource Present; however, these properties are surface parking lots within the Uptown Tenderloin Historic District and were thus given a 6X Status Code as part of that survey, meaning that the properties were determined to be ineligible for listing on the National Register either individually or as part of the Uptown Tenderloin Historic District nomination.

The 200 Larkin Street (Asian Art Museum) Project proposed an “addition of a single-story, 13,000-square-foot special exhibition pavilion with a rooftop terrace at the rear of the building facing Hyde Street. The proposed addition would be constructed on top of the existing non-historic ground floor level conservation laboratory spaces, preparation shops, and mechanical rooms that were built during the building’s 2003 renovation. The planning department’s preservation staff has reviewed the design of the modified project and found that there would be no adverse impacts on historic resources. Staff has determined that the proposed work would be compatible with the character-defining features of the building, and would be in conformance with the requirements of Article 10 for new construction in a landmark district and the Secretary of the Interior’s Standards for Rehabilitation. Therefore, the modified project would not have new significant impacts or increase the severity of the previously identified impacts on historic resources.”<sup>55</sup> The remaining five current cumulative projects listed in Table IV-1 do not entail the demolition or alteration of known historic resources under CEQA.<sup>56</sup>

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<sup>54</sup> San Francisco Planning Department, *San Francisco Property Information Map*, <http://propertymap.sfplanning.org>, accessed October 11, 2017.

<sup>55</sup> San Francisco Planning Department, Certificate of Appropriateness Case Report, Case No. 2016-016257COAGPR, 200 Larkin Street, Hearing Date July 19, 2017. A copy of this document is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File No. 2015.01522ENV.

<sup>56</sup> San Francisco Planning Department, *San Francisco Property Information Map*, <http://propertymap.sfplanning.org>, accessed October 11, 2017.



The project site is not currently located in an existing or proposed historic district. As discussed above, the impact of the proposed project on historic architectural resources is specific to the building on the project site at 500 Turk Street, which is located outside of the Uptown Tenderloin Historic District, the potential and now non-extant Pine Street Auto Shops Historic District identified in the 2010 Survey, and the potential Tenderloin LGBTQ Historic District.

Based on the foregoing, the proposed project in combination with other past, present, and reasonably foreseeable future projects in San Francisco is not expected to have a significant cumulative impact on a historic architectural resource (other than the building on the project site at 500 Turk Street).

Even so, this draft EIR conservatively assumes that a larger potential historic district related to Van Ness Auto Row could be identified in the future (see below), in addition to the five-building Pine Street Auto Shops Historic District identified in the 2010 Survey. This draft EIR further conservatively assumes that the 500 Turk Street building and other buildings within 0.25 miles of the project site could be contributors to said potential district. Thus, for purposes of this draft EIR, it is conservatively assumed that the proposed project could result in a significant cumulative impact because of its proximity to and association with other automobile-related buildings along the Van Ness Avenue corridor described in the 2010 Survey. Although located two blocks east of Van Ness Avenue and historically used to provide secondary support services, the building at 500 Turk Street is associated with a result of the commercial growth along Van Ness Avenue related to selling and repairing automobiles.

As discussed above, none of the other cumulative projects would demolish or otherwise materially impair a historic architectural resource of the type identified in the 2010 Survey. However, taken together with past and possible future demolitions of historic architectural resources of this type, it is conservatively assumed for purposes of this draft EIR that the proposed project could contribute to a significant cumulative impact on the ability of such resources to convey their collective significance as survivors of a once sizable collection of automotive-related services along or near the Van Ness Avenue corridor that emerged in the aftermath of the 1906 earthquake and fire and continued to the mid- to-late 20th century. This draft EIR further conservatively assumes that the proposed project

could make a cumulatively considerable contribution to a significant impact on historic architectural resources of this type. Therefore, it is conservatively assumed for purposes of this draft EIR that the impact could be significant. Implementation of **Mitigation Measure M-CR-1a: Documentation**, **Mitigation Measure M-CR-1b: Interpretive Display**, and **Mitigation Measure M-CR-1c: Salvage**, would reduce this cumulative impact on historic architectural resources, but not to a less-than-significant level. Thus, it is assumed for purposes of this draft EIR that the cumulative impact would remain significant and unavoidable.

## V. OTHER CEQA ISSUES

This chapter discusses the following topics in relation to the proposed project: growth inducement; significant environmental effects that cannot be avoided if the proposed project is implemented; significant irreversible environmental changes that would result if the proposed project is implemented; and areas of controversy and issues to be resolved.

### GROWTH INDUCEMENT

A project is considered growth inducing if it would directly or indirectly foster substantial economic or population growth, or the construction of substantial amounts of additional housing. Examples of projects likely to result in significant adverse growth inducement include extensions or expansions of infrastructure systems beyond what is needed to serve project-specific demand, and development of new residential subdivisions in areas that are sparsely developed or undeveloped. The project would be located on an infill site, surrounded on all sides by urban uses, and would not result in the extension of infrastructure into undeveloped areas or the construction of a residential project in an area that is undeveloped or lightly developed. Population growth that would result from the proposed project would be limited to the project site itself and the project would not directly or indirectly induce growth beyond the project site.

In addition, as discussed in Section H.2, Population and Housing, pp. 44-43, in the NOP/IS (see Appendix A), the proposed project would introduce 108 new residential units and increase the residential population of the project site by approximately 157 persons. The 2015 U.S. Census indicates that the population in the project vicinity (Census Tract 124.02) is approximately 3,600 persons. Thus, the proposed project would increase the population near the project site by approximately 4.36 percent. The population of San Francisco is projected to increase by approximately 280,490 persons for a total of 1,085,725 persons by 2040. The residential population introduced as a result of the proposed project would constitute less than 1 percent of projected city-wide growth. As such, the population

increase would be accommodated within the planned growth for San Francisco. In addition, the proposed project would include approximately seven employees associated with the ground floor commercial space<sup>1</sup> and approximately 11 employees associated with the residential use,<sup>2</sup> 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.

Furthermore, the proposed project would contribute to meeting Association of Bay Area Governments (ABAG) regional housing objectives and would conform with ABAG regional goals to focus growth and development by creating compact communities with a diversity of housing, jobs, activities, and services; increasing housing supply; and improving housing affordability by providing 107 affordable residential housing units. Therefore, the proposed project would not directly or indirectly induce substantial population growth in San Francisco.

### **SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES THAT WOULD RESULT IF THE PROPOSED PROJECT IS IMPLEMENTED**

In accordance with sections 15126.2(c) and 15127 of the CEQA Guidelines, an EIR must identify any significant irreversible environmental changes that could result from implementation of the proposed project. Such significant irreversible environmental changes may include current or future uses of non-renewable resources, secondary or growth-inducing impacts that commit future uses of non-renewable resources, and secondary or growth-inducing impacts that commit future generations to similar uses. According to the CEQA Guidelines, irretrievable commitments of resources should be evaluated to assure that such current consumption is justified. In general, such irreversible commitments include the uses of resources such as energy and materials used to construct a

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<sup>1</sup> United States Green Building Council, Building Area per Employee by Business Type, May 13, 2008, <https://www.usgbc.org/Docs/Archive/General/Docs4111.pdf>, accessed August 6, 2017. Assumes one employee per 383 square feet of community retail use.

<sup>2</sup> Findley, Daniel, Tenderloin Neighborhood Development Corporation. August 3, 2017.

proposed project, as well as the energy and natural resources (including water) that would be required to sustain a project and its inhabitants or occupants over the usable life of the project.

The project site is located within a densely populated area of San Francisco and within the city's Tenderloin neighborhood. The site is surrounded by a range of commercial, office, institutional, residential, and hotel uses. The approximately 0.43-acre site is entirely covered with impervious surfaces comprised of the existing tire shop and automotive repair building and associated surface parking lot. While the proposed project would result in an increase in the density of development at the project site through the introduction of new residential dwelling units, commercial space, and open space, it would be compatible with the existing uses around the site and within this area of the city.

No significant environmental damage, such as accidental spills or explosion of a hazardous material, is anticipated with implementation of the proposed project. Compliance with federal, state, and local regulations would ensure that construction and operation activities at the project site would not result in the release of hazardous materials into the environment and that associated impacts would be less than significant (refer to Section H.15, Hazards and Hazardous Materials, pp.143-152 of the NOP/IS). As such, no irreversible changes – such as those that might result from construction of a large-scale mining project, a hydroelectric dam project, or other industrial project – would result from development of the proposed project.

Consumption of nonrenewable resources includes increased energy consumption, conversion of agricultural lands, and lost access to mining reserves. As discussed in Section H.17, Agriculture and Forest Resources, pp. 154–155 of the NOP/IS (see Appendix A), the State Department of Conservation designates the site as “Urban and Built-Up Land,” and the site is located in an urbanized area of San Francisco. Therefore, no existing agricultural lands would be converted to non-agricultural uses. In addition, the project site does not contain known mineral resources and does not serve as a mining reserve; thus, development of the proposed project would not result in the loss of access to mining reserves. Refer to Section H.16, Mineral and Energy Resources, pp. 152-153 of the NOP/IS.

Construction of the proposed project would require the use of energy, including energy produced from non-renewable resources. Energy consumption would also occur during the operational period of the proposed project. The proposed project would be required to incorporate green building features consistent with the city's Green Building Ordinance that are anticipated to result in additional reductions in GHG emissions. As discussed in Section H.7, Greenhouse Gas Emissions of the NOP/IS, pp. 107-112, the proposed project would not result in any significant impacts associated with an increase in greenhouse gas emissions or conflict with measures adopted for the purpose of reducing such emissions because the project would be compliant with the city's Greenhouse Gas Reduction Strategy. Additionally, the proposed project would not require the construction of major new lines to delivery energy or natural gas as these services are already provided in the area. Therefore, the proposed project would not result in a significant impact associated with the consumption of nonrenewable resources.

## **SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS**

In accordance with section 21067 of CEQA and with section 15126(b) and section 15126.2(b) of the CEQA Guidelines, the purpose of this section is to identify significant environmental impacts that could not be eliminated or reduced to less-than-significant levels by implementation of mitigation measures included in the proposed project or identified in Chapter IV, Environmental Setting and Impacts, pp. 43–96. The findings of significant impacts are subject to final determination by the San Francisco Planning Commission as part of the certification process for this draft EIR.

As identified in Section IV.A, Historic Architectural Resources, pp.51–96, under **Impact CP-1**, demolition of the 500 Turk Street building under the proposed project would result in a significant and unavoidable impact on the individual historic architectural resource at 500 Turk Street, which is identified as a historic resource under CEQA. Implementation of **Mitigation Measure M-CR-1a: Documentation**, **Mitigation Measure M-CR-1b: Interpretive Display**, and **Mitigation Measure M-CR-1c: Salvage** would reduce this adverse impact on the historic resource, but not to a less-than-significant level. There is no feasible mitigation measure that could avoid this project-related historic

architectural resource impact. Therefore, the impact on the historic resource on the project site would remain significant and unavoidable.

As explained in Section IV.A, Historic Architectural Resources, pp.51–96, under **Impact C-CR-1**, none of the other cumulative projects would demolish or otherwise materially impair a historic architectural resource of the type identified in the 2010 Survey. However, taken together with past and possible future demolitions of historic architectural resources of this type, it is assumed for purposes of this draft EIR that the proposed project could contribute to a significant cumulative impact on the ability of such resources to convey their collective significance as survivors of a once-sizeable collection of automotive-related services along or near the Van Ness Avenue corridor that emerged in the aftermath of the 1906 earthquake and fire and continued to the mid- to late-20<sup>th</sup> century. The proposed project could make a cumulatively considerable contribution to a significant impact on historic architectural resources of this type. Therefore, it is assumed for purposes of this draft EIR that the impact would be significant. Implementation of **Mitigation Measure M-CR-1a: Documentation**, **Mitigation Measure M-CR-1b: Interpretive Display**, and **Mitigation Measure M-CR-1c: Salvage**, would reduce this cumulative impact on historic architectural resources, but not to a less-than-significant level. Thus, it is assumed for purposes of this draft EIR that the cumulative impact would remain significant and unavoidable.

## **AREAS OF KNOWN CONTROVERSY AND ISSUES TO BE RESOLVED**

Publication of the NOP/IS initiated a 30-day public review and comment period that began on October 11, 2017, and ended on November 10, 2017. During the review and comment period, one letter was submitted to the planning department by an interested party, advising the city of the consultation process pursuant to AB 52. This issue is addressed on pp. 51-52 of the NOP/IS.

Correspondence received in response to the NOP/IS is available for review as part of Case File No. 2016-010340ENV. The planning department has considered the comments made by the public in preparation of the draft EIR for the proposed project.

**SUMMARY**

The above issues are addressed and analyzed throughout this draft EIR and the NOP/IS. This draft EIR will be circulated for public review and comment. During this period, written comments concerning the accuracy and adequacy of the draft EIR will be accepted and a public hearing will be held before the planning commission to receive oral comments. After the close of the public comment period, written responses will be prepared to address substantive comments received on the environmental analysis, and any revisions to the draft EIR will be identified.



## VI. ALTERNATIVES

The CEQA Guidelines require the analysis of a reasonable range of alternatives to the proposed project or to the location of the project, which would feasibly attain most of the basic objectives of the project and avoid or substantially lessen any of the significant effects of the project (CEQA Guidelines section 15126.6). The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit informed public participation and an informed and reasoned choice by the decision-making body (CEQA Guidelines section 15126.6(f)).

CEQA generally defines “feasible” to mean the ability to be accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors. The following factors may also be taken into consideration when assessing the feasibility of alternatives: site suitability; economic viability; availability of infrastructure; general plan consistency; other plans or regulatory limitations; jurisdictional boundaries; and the ability of the proponent to attain site control (CEQA Guidelines section 15126.6(f)(1)). An EIR need not consider every conceivable alternative, but must consider a reasonable range of alternatives that will foster informed decision-making and public participation. The final determination of feasibility will be made by decision-makers based on substantial evidence in the record, which includes, but is not limited to, information presented in the EIR, comments received on the Draft EIR, and responses to those comments.

City decision-makers could adopt an alternative instead of approving the proposed project if that alternative would substantially reduce or eliminate significant environmental impacts identified for the proposed project, the alternative is feasible, and the alternative would achieve most of the proposed project objectives. The determination of feasibility would be made by city decision-makers based on substantial evidence in the record, which must include, but would not be limited to, information presented in the draft EIR and the comments received.

CEQA also requires that a No Project Alternative be evaluated (CEQA Guidelines section 15126.6(e)); the analysis of the No Project Alternative is based on the assumption that the project would not be approved. In addition, an environmentally superior alternative must be identified among the alternatives considered. The environmentally superior alternative is generally defined as the alternative that would result in the least adverse environmental impacts on the project sites and affected environment. If the No Project Alternative is found to be the environmentally superior alternative, the EIR must identify an environmentally superior alternative among the other alternatives.

CEQA Guidelines section 15126.6(c) also requires an EIR to identify and briefly discuss any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process. In identifying alternatives, primary consideration was given to alternatives that would reduce significant impacts while still meeting most of the basic project objectives. Those alternatives that would have impacts identical to or more severe than the proposed project, or that would not meet most of the project objectives, may be rejected from further consideration.

This chapter identifies alternatives to the proposed project and discusses potential environmental impacts associated with each alternative. Alternatives were selected that would substantially reduce or avoid the significant unavoidable impacts related to historic architectural resources as identified in this draft EIR. Potential alternatives were developed in collaboration with planning department historic preservation staff, the project sponsor, and the Architectural Review Committee, based on input received at their regular meeting on August 2, 2017,<sup>1</sup> per the Historic Preservation Commission's Resolution No. 0746.<sup>2</sup>

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<sup>1</sup> San Francisco Planning Department, Meeting Notes from the Review and Comment at the August 2, 2017 Historic Preservation Commission Architectural Review Committee (ARC) meeting for 500 Turk Street Residential Project Preservation Alternatives Draft EIR, Case No. 2016-010340ENV, August 8, 2017.

<sup>2</sup> City and County of San Francisco, Historic Preservation Commission, March 18, 2017, Resolution No. 0746.

The focus of the alternatives analysis is on the topic of historic architectural resources. All other environmental issue topics were identified as less than significant or less than significant with mitigation in the NOP/IS. Therefore, this alternatives analysis does not address other issue topics.

## SUMMARY OF PROJECT ALTERNATIVES

This chapter compares three alternatives, as summarized below:

- The **No Project Alternative**, under which the project site would not be redeveloped with the proposed project and the project site would remain in its existing condition.
- The **Full Preservation Alternative**, under which the existing building would be retained in its entirety with a new one-story addition on the Turk Street Wing and a new seven-story building would be constructed in the open portion of the lot to the north. A total of 32 residential units and approximately 4,079 square feet of commercial space would be developed.
- The **Partial Preservation Alternative**, under which portions of the existing building would be retained and new seven-story building would be constructed in the open portion of the lot to the north, with five- to six-story rooftop additions over the existing Larkin and Turk street Wings. A total of 56 residential units and approximately 2,850 square feet of commercial space would be developed.

**Table VI-1** compares key elements of these alternatives to the proposed project. **Figures VI-1** through **VI-8b** (p. 111, pp. 115–118, and pp.121–125) depict the conceptual site plans and elevations for each development alternative.

Table VI-1: Comparison of Characteristics and Significant Impacts of the Proposed Project with EIR Alternatives

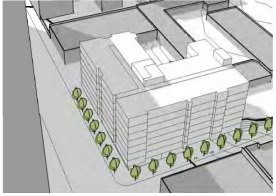
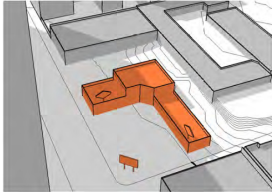
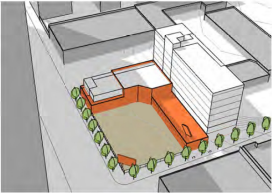
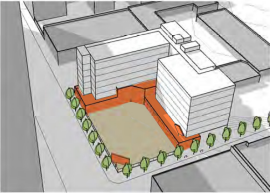
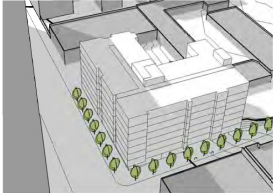
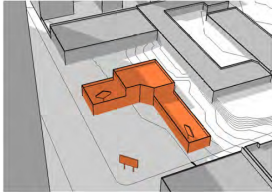
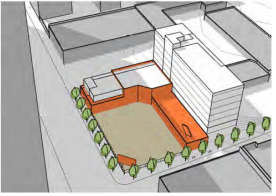
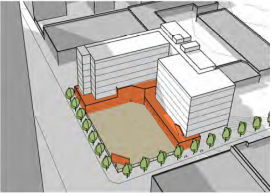
	Proposed Project	No Project Alternative	Full Preservation Alternative	Partial Preservation Alternative
				
<b>Description</b>				
Height (feet)	79	30	72	72
Number of stories	8	2	7	7
Number of residential units	108	0	32	56
Square foot (sf) by use				
Residential	81,869	0	26,400	34,000
Residential support and common areas	3,564	0	3,500	3,500
Commercial/retail	2,597	9,430	4,100	2,900
<b>Total square feet</b>	<b>105,802</b>	<b>9,430</b>	<b>44,300</b>	<b>63,980</b>
On-grade open space	5,240	0	6,230	6,230
<b>Ability to meet project sponsor's objectives</b>				
	Yes	No	Some	Some

Table VI-1: Comparison of Characteristics and Significant Impacts of the Proposed Project with EIR Alternatives

	Proposed Project	No Project Alternative	Full Preservation Alternative	Partial Preservation Alternative
				
<b>Historic Archaeological Resources</b>				
Historic Architectural Resources	<u>Impact CR-1</u> : The proposed project would cause a substantial adverse change in the significance of the Kahn and Keville Building located at 500 Turk Street, a historic resource as defined by CEQA Guidelines section 15064.5(b). (SUM)	N/A	Reduced impact (LTS)	Reduced impact but same outcome as the proposed project (SUM)
Cumulative – Historic Architectural Resources	<u>Impact C-CR-1</u> : The proposed project, in combination with other past, present and reasonably foreseeable future projects in the project vicinity, could result in a cumulatively considerable contribution to a significant cumulative impact on a historic architectural resource. (SUM)	N/A	Reduced impact (LTS)	Reduced impact but same outcome as the proposed project (SUM)

## Notes:

<sup>1</sup> Plan assumes available openings, such as garage doors, which collectively exceed 25 percent of external wall surfaces facing public streets, can be changed to storefront without being considered "demolition" under Planning Code section 1005. Square footage estimates assume that marketable ground-floor retail spaces would be feasible notwithstanding 75 percent interior demolition limitations.

NI = no impact; LTS = less than significant impact; S = significant impact; SU = significant and unavoidable impact; SUM = significant and unavoidable impact with mitigation; N/A = not applicable

Source: Tenderloin Neighborhood Development Corporation and David Baker Architects, 2017.

## NO PROJECT ALTERNATIVE

CEQA Guidelines section 15126.6(e) requires that, among the project alternatives, a “no project” alternative be evaluated. CEQA Guidelines section 15126.6(e)(2) requires that the No Project Alternative analysis “discuss the existing conditions...as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and policies and consistent with the available infrastructure and community services.” As noted in CEQA Guidelines section 15126.6, an EIR on “a development project on identifiable property” typically analyzes a no project alternative, i.e., “the circumstance under which the project does not proceed. Such a discussion would compare the environmental effects of the property remaining in its existing state against environmental effects that would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this ‘no project’ consequence should be discussed.”

### Description

Under the CEQA-required No Project Alternative, the site would generally remain in its existing condition and would not be redeveloped with residential, commercial, and open space uses. No affordable housing would be developed on the site and no changes to the surrounding on-street parking spaces and curb space would occur. The existing one- to two-story, 20- to 30-foot-tall, 7,315-square-foot concrete tire and automobile service building and associated surface parking lot would not be removed. Building heights on the site would not be increased. The No Project Alternative would not preclude potential future development of the project site with a range of land uses that are principally permitted at the project site; however, for the purposes of this analysis, it is assumed that under the No Project Alternative the existing building would remain although it could be occupied by a new tire and automobile service business or other similar use, as the current building tenants are planning to vacate the building.

## Objectives

Because the physical environment of the site would be unchanged, the No Project Alternative would not achieve any of the project sponsor's objectives for the project. In particular, objectives regarding the redevelopment of an underutilized site, construction of residential units and ground floor commercial space, provision of affordable housing units, provision of family-sized dwelling units, creation of attractive and active building frontages along Turk and Larkin streets, and development of transit-oriented development would not be achieved. See Chapter II, Project Description, pp. 11–32, for a complete description of the project objectives.

## Impacts

Under the No Project Alternative, the existing building at 500 Turk Street would not be demolished. The building, which has been determined to be eligible for listing on the California Register of Historic Resources (CRHR), and thus a historic resource under CEQA for purposes of this draft EIR, would be retained. Therefore, compared to the proposed project, which would result in a significant unavoidable project-level impact on historic architectural resources, the No Project Alternative would not result in any impacts related to historic architectural resources. The No Project Alternative, as compared to the proposed project, would also avoid the cumulative-level impact on historic architectural resources conservatively assumed in this draft EIR.

## FULL PRESERVATION ALTERNATIVE

### Description

Under the Full Preservation Alternative, the existing building, including its character-defining L-shaped building plan and one- to two-story building height would remain. This alternative would retain the changeable sign at the southeast corner of the project site and one of the diamond-shaped *Goodyear Tire* signs, atop the Larkin Street Wing, which have been identified as character-defining

features in the 2017 HRER.<sup>3</sup> However, this alternative would include a partial one-story addition to the existing one-story portion of the Turk Street Wing to accommodate additional dwelling units. This alternative would also require interior rehabilitation of the existing building to accommodate improvements for ground floor retail and common residential amenity spaces. The remainder of the dwelling units would be provided in a new residential tower abutting the north façade of the existing building. **Figure VI-1** depicts the site plan for the Full Preservation Alternative.

The Full Preservation Alternative would result in development of approximately 32 dwelling units, 76 fewer units than the proposed project; blank property line walls facing north and west due to required single-loaded residential corridors; open space for project residents along Turk and Larkin streets that would be fenced off from public access; and larger retail spaces set back and separated from Turk and Larkin streets by the fenced area.

The Full Preservation Alternative would provide approximately 26,400 square feet of residential space compared to the approximately 82,000 square feet of residential space proposed as part of the project. The Full Preservation Alternative would provide approximately 4,100 square feet of commercial/retail space compared to approximately 2,600 square feet provided as part of the proposed project. In addition, the Full Preservation Alternative would provide a total of approximately 6,230 square feet of open space for project residents at the corner of Turk and Larkin streets, as opposed to approximately 5,240 square feet of open space in a protected courtyard at the rear of the building as part of the proposed project.

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<sup>3</sup> Cleemann, Jorgen G., Preservation Planner, San Francisco Planning Department, *Historic Resources Evaluation Response, 500 Turk Street*, June 5, 2017.



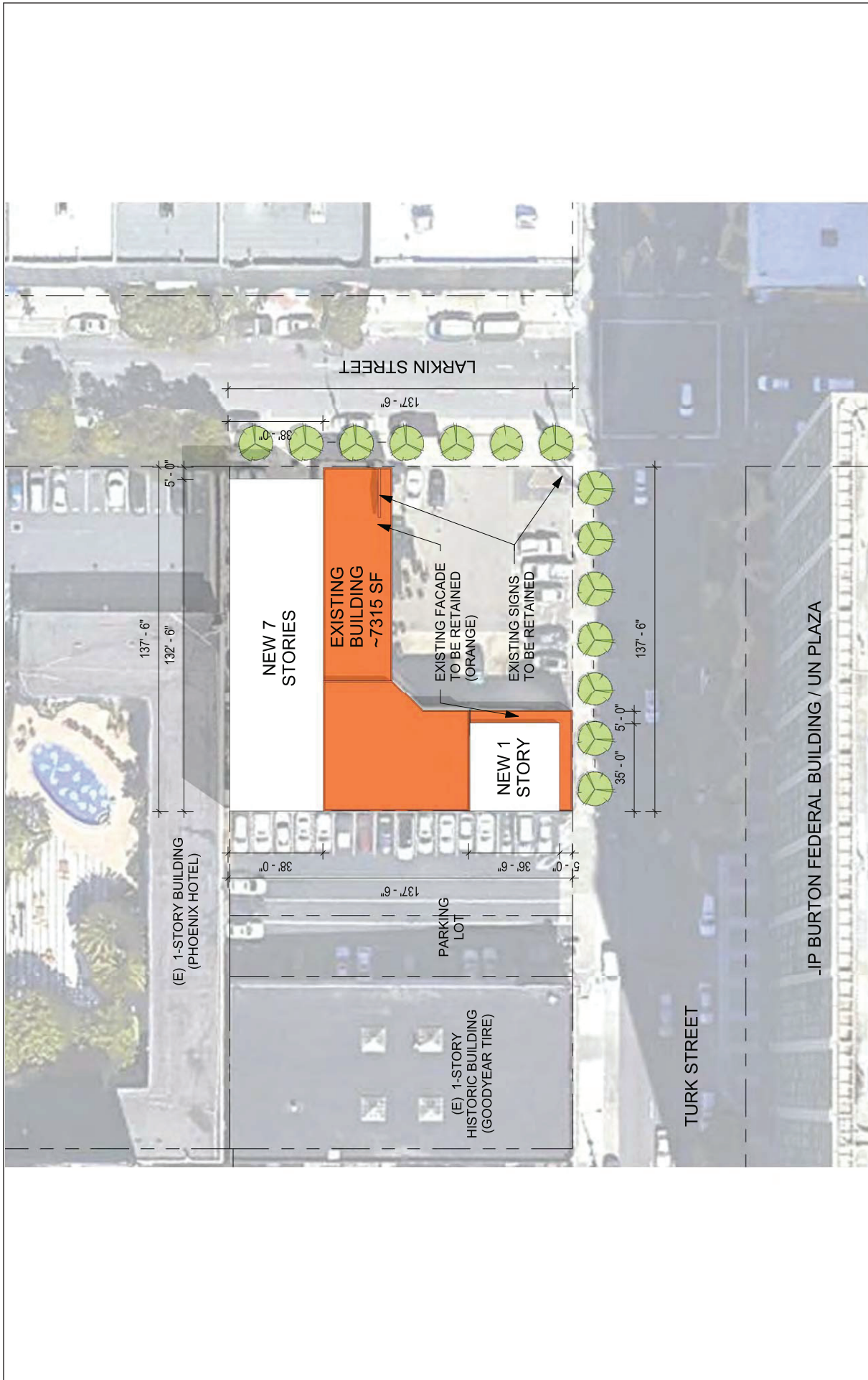


FIGURE VI-1



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As with the proposed project, the Full Preservation Alternative would not include on-site parking. However, the Full Preservation Alternative would also include five new on-street parking spaces, similar to the proposed project.

**Figure VI-2**, p.115, depicts the conceptual ground level floor plan for the Full Preservation Alternative. **Figure VI-3**, p.116, provides a typical floor plan for the third to seventh levels and **Figures VI-4a and VI-4b**, pp. 117–118, provide conceptual south and east building elevations.

### **Objectives**

The Full Preservation Alternative would partially meet the project objectives, but to a lesser extent than the proposed project. The Full Preservation Alternative would result in the redevelopment of the site with affordable housing units, ground floor commercial space, common open space for residents of the project, and common residential amenity spaces, contributing to objectives related to the provision of a mix of uses on the site, accessible open space, and creation of a transit-oriented development. However, the Full Preservation Alternative would provide approximately 76 fewer affordable residential units as compared to the proposed project, reducing the project sponsor's ability to meet project objectives related to economic feasibility, maximization of the number of affordable residential units in response to the current shortage of affordable housing, and provision of family-sized dwelling units. See Chapter II, Project Description, pp. 11–32, for a complete description of the project objectives.

### **Impacts**

The Full Preservation Alternative would retain the entirety of the existing building at 500 Turk Street with only a small one-story addition to the rooftop of the Turk Street Wing. However, this alternative would introduce a large, imposing building mass north of and adjacent to the one-to-two-story L-shaped building. While this new construction (a seven-story building) would impact integrity of feeling, setting, and design, the 2017 HRER concludes that the proposed design would retain the building's architectural character-defining features and materials.

The Full Preservation Alternative would observe appropriate setbacks from the Larkin Street Wing, and the aforementioned addition would not rise above the two-story portion of the existing building. The new seven-story residential tower would abut and conceal only the north façade of the existing building, which is not a character-defining feature of the historic resource.

In keeping with the Secretary of the Interior's Standards for Rehabilitation, all character-defining features and materials of the existing building, with the exception of one of the Goodyear Tire signs, would be retained, including its varied one- to two-story height, L-shaped plan, stucco cladding with ornamental scoring, some of the steel-sash windows, Art Deco piers, some of the distinctive signage (see below), and the open vehicle maneuvering area at the southeast corner (although no longer paved or used for vehicle maneuvering). The one-story rooftop addition and new seven-story residential tower would not infringe detrimentally on the existing building's significant form, massing, or spatial relationships. Moreover, this alternative would retain the changeable sign at the southeast corner of the project site and the diamond-shaped Goodyear Tire sign atop the Larkin Street Wing, which are identified in the 2017 HRER as character-defining features.<sup>4</sup>

Where character-defining features and materials, such as the steel-sash windows,<sup>5</sup> the diamond-shaped Goodyear Tire sign atop the Larkin Street Wing, and the changeable sign at the southeast corner of the project site, could be removed before construction, securely stored, and subsequently reinstalled, compatible replacement materials and features would be used should the original materials be extensively deteriorated and beyond reasonable repair.

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<sup>4</sup> Although the setback rooftop addition over the south wing would necessitate the removal of one of the Goodyear Tire signs, the two other signs would be retained, thereby maintaining the overall integrity of the signage.

<sup>5</sup> As explained in the 2017 HRE, some of the steel-sash windows on the existing second story portion of the building may need to be replaced to accommodate residential use, but would be replaced with similarly styled windows made of thermally broken aluminum or metal sash.



FIGURE VI-2

500 Turk Street Project  
 Full Preservation Alternative Conceptual Ground Floor Plan



FIGURE VI-3





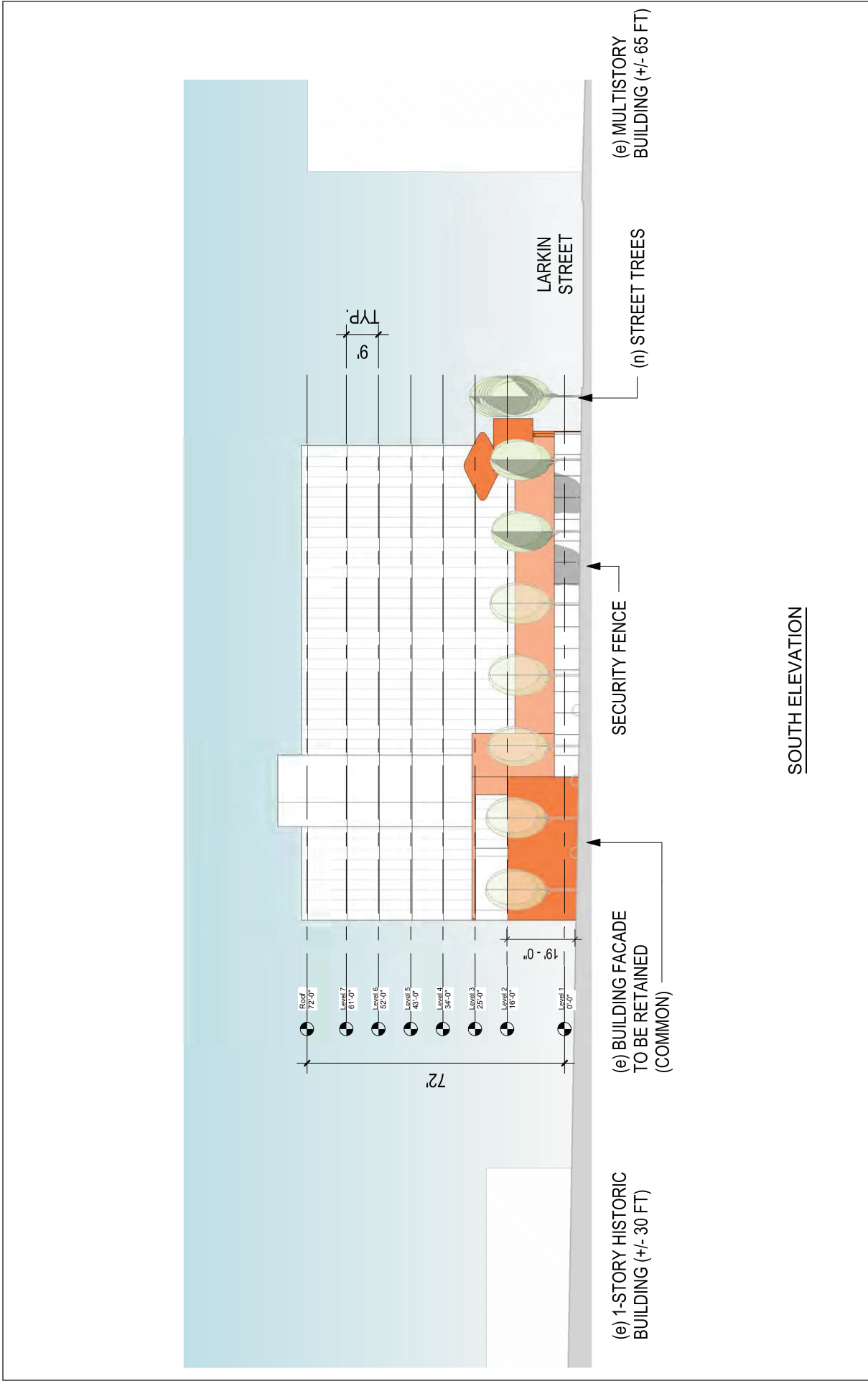


FIGURE VI-4a

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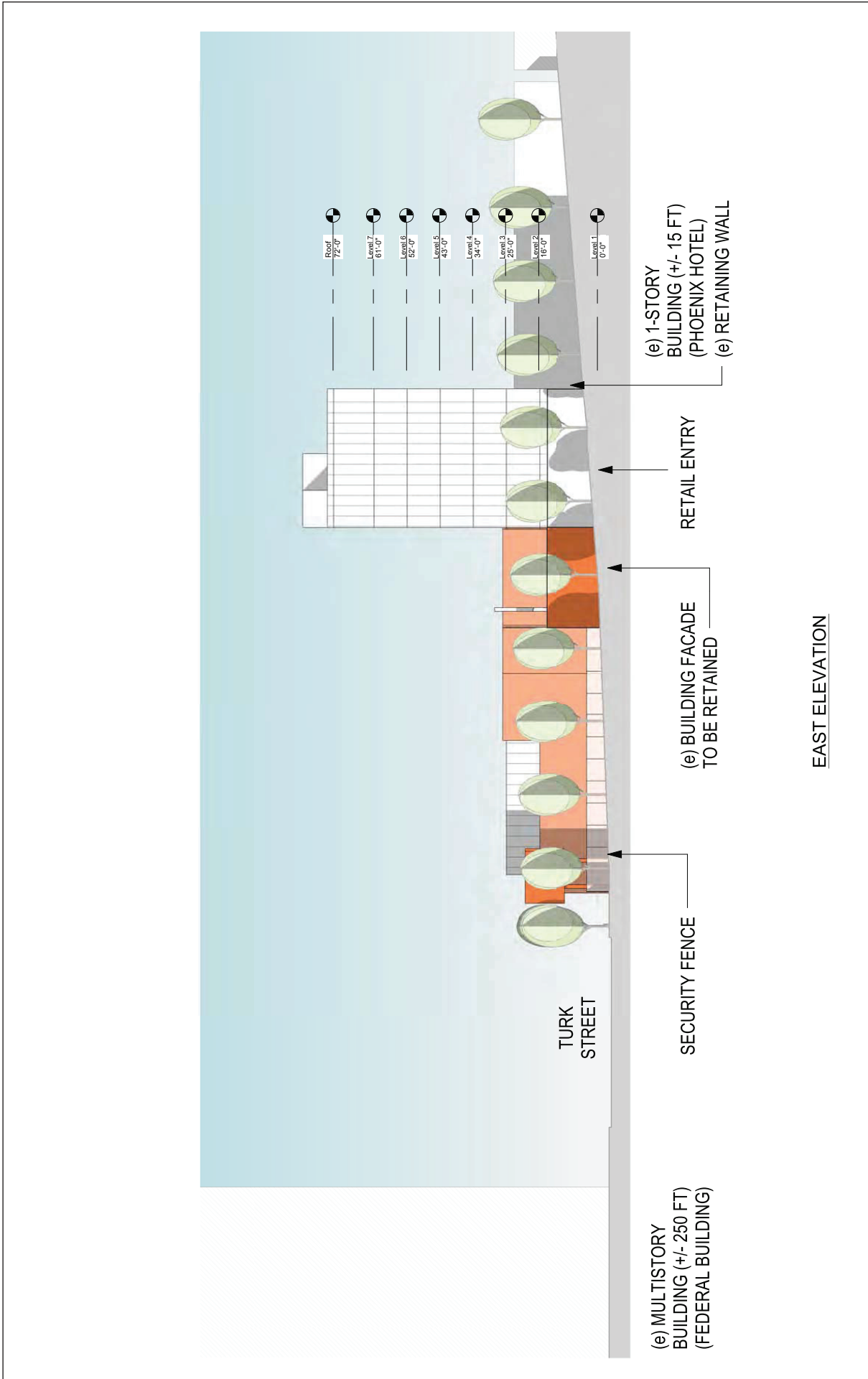


FIGURE VI-4b



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Under the Full Preservation Alternative, the 500 Turk Street building, which has been determined to be eligible for listing on the CRHR, and thus a historic resource under CEQA, would be retained, with minor modifications that would not detract from the historic integrity of the resource. Therefore, compared to the proposed project, which would result in significant unavoidable project-level impacts on historic architectural resources, the Full Preservation Alternative would not result in a significant impact related to historic architectural resources. The Full Preservation Alternative, as compared to the proposed project, would also avoid the cumulative-level impact on historic architectural resources conservatively assumed in this draft EIR.

## **PARTIAL PRESERVATION ALTERNATIVE**

### **Description**

Under the Partial Preservation Alternative, portions of the existing building would be retained in such a way that the character defining L-shaped building would be preserved. This alternative would retain the changeable sign at the southeast corner of the project site and one of the diamond-shaped Goodyear Tire signs, atop the Larkin Street Wing, which have been identified as character-defining features in the 2017 HRER. However, as shown in **Figure VI-5**, p. 121, the existing building would also include five- to six-story additions over the northwest corner and the Turk and Larkin street Wings to provide space for new dwelling units. This alternative would also include dwelling units on the second story of the existing building, which, along with improvements for the ground floor commercial and common residential amenity spaces, would require an interior and exterior rehabilitation of the existing building.

As part of the rehabilitation of the existing building, the second story would be converted to two residential units. The existing Larkin Street façades would be retained and interior spaces reconfigured to contain ground-floor commercial and common residential amenity spaces. Due in part to the setbacks from existing façades facing Turk and Larkin streets, the Partial Preservation Alternative would not develop the existing surface parking area on the site and would result in the development of approximately 56 dwelling units, 52 fewer units than the proposed project. In addition, this alternative would create blank property line walls facing north and west due to required

single-loaded residential corridors, open space for project residents along Turk and Larkin streets that would be fenced off from public access, and larger retail spaces set back and separated from Turk and Larkin streets by the fenced area.

The Partial Preservation Alternative would provide approximately 34,000 square feet of residential space compared to the approximately 82,000 square feet of residential space included as part of the proposed project. The Partial Preservation Alternative would also provide approximately 2,900 square feet of commercial space compared to approximately 2,600 square feet provided as part of the proposed project. In addition, the Partial Preservation Alternative would provide a total of approximately 6,230 square feet of open space for project residents at the corner of Turk and Larkin streets, as opposed to approximately 5,240 square feet of open space in a protected courtyard at the rear of the building as part of the proposed project.

As with the proposed project, the Partial Preservation Alternative would not include on-site parking. However, the Partial Preservation Alternative would include five new on-street parking spaces, similar to the proposed project.

**Figure VI-6**, p. 122, depicts the conceptual ground level floor plan for the Partial Preservation Alternative. **Figure VI-7**, p. 123, provides a typical floor plan for the third to seventh levels and **Figures VI-8a and VI-8b**, pp. 124–125, provide conceptual south and east building elevations.

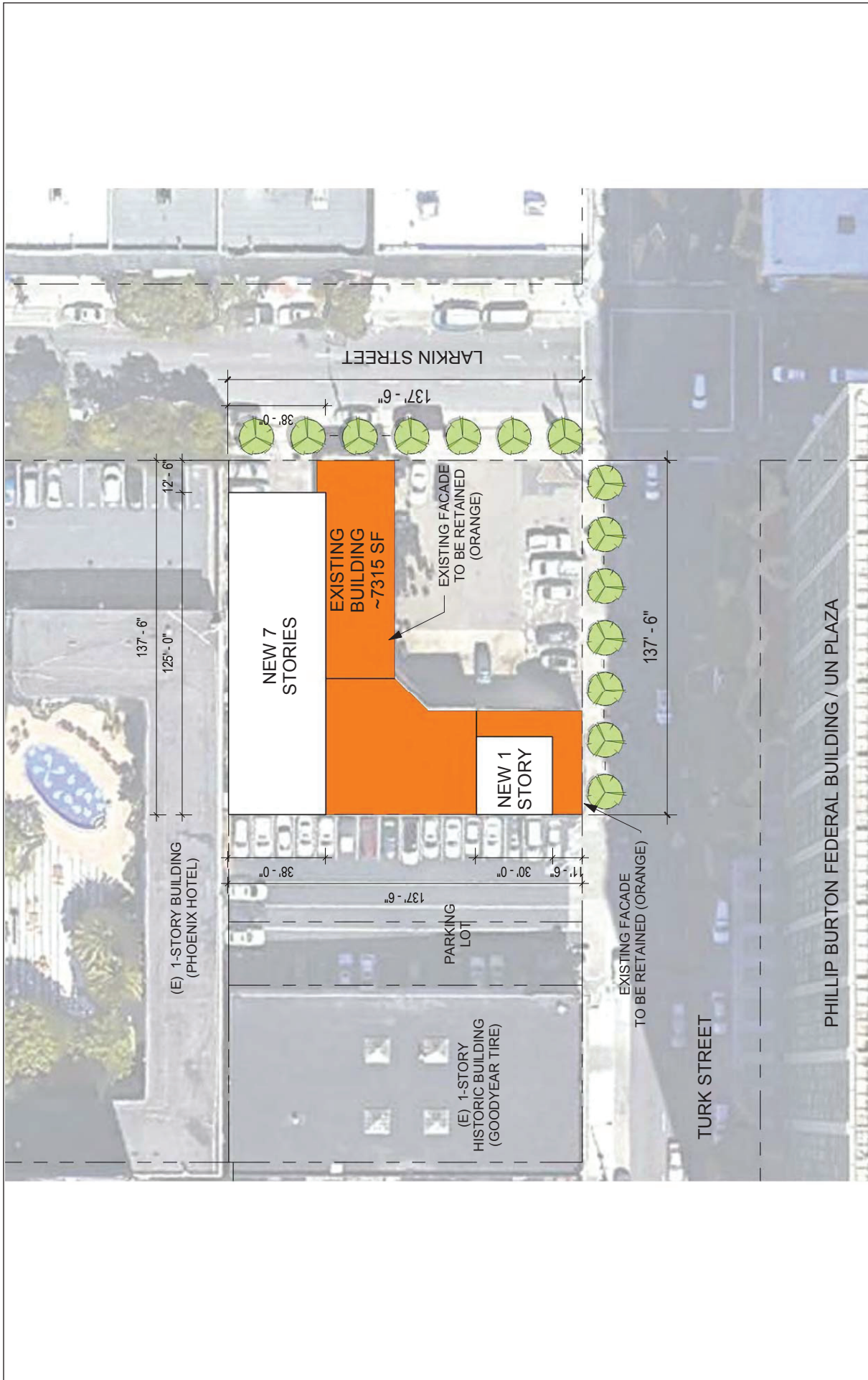


FIGURE VI-5



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FIGURE VI-6

500 Turk Street Project  
 Partial Preservation Alternative Conceptual Ground Floor Plan



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SOURCE: DAVID BAKER ARCHITECTS, JUNE 2017.

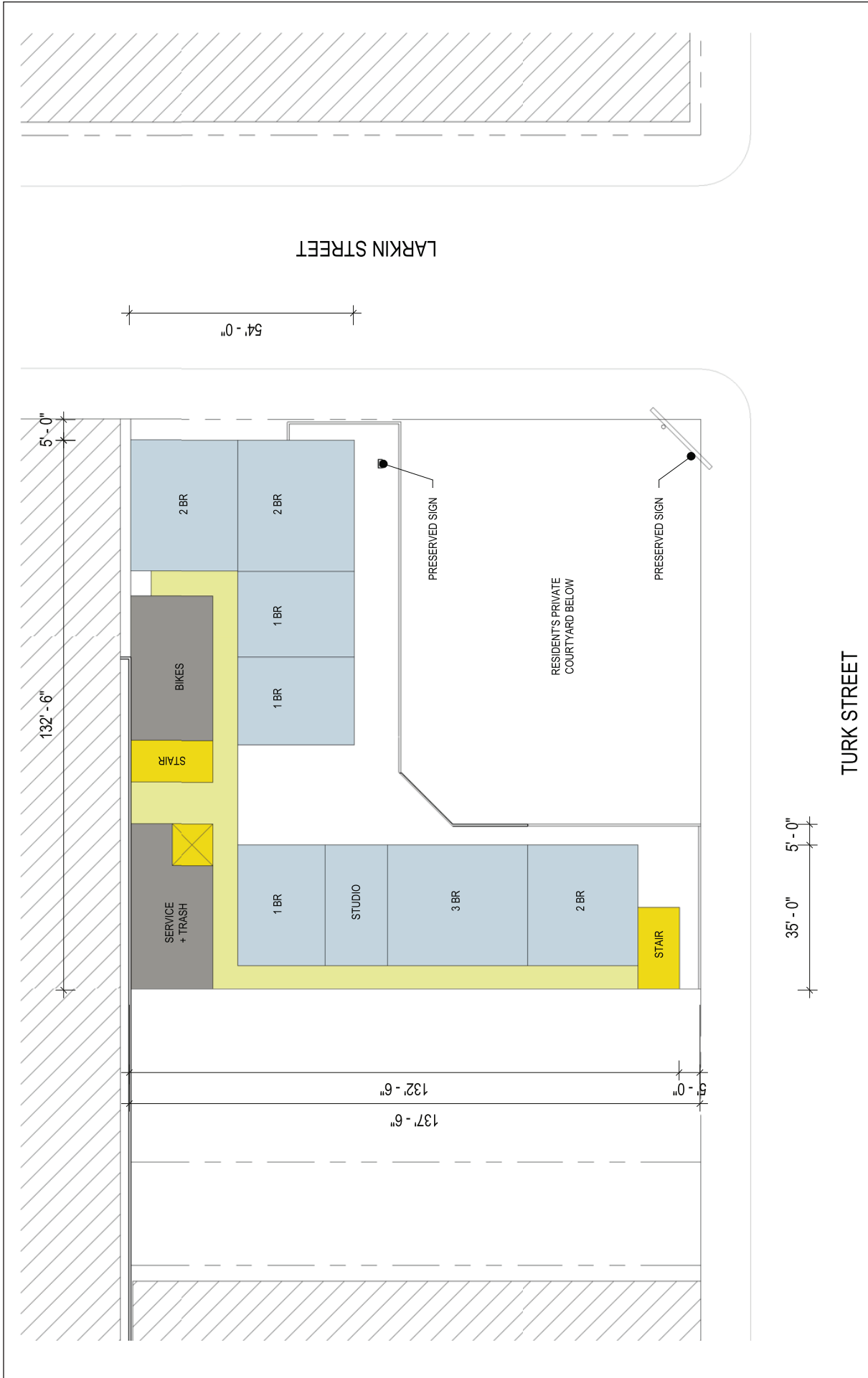


FIGURE VI-7



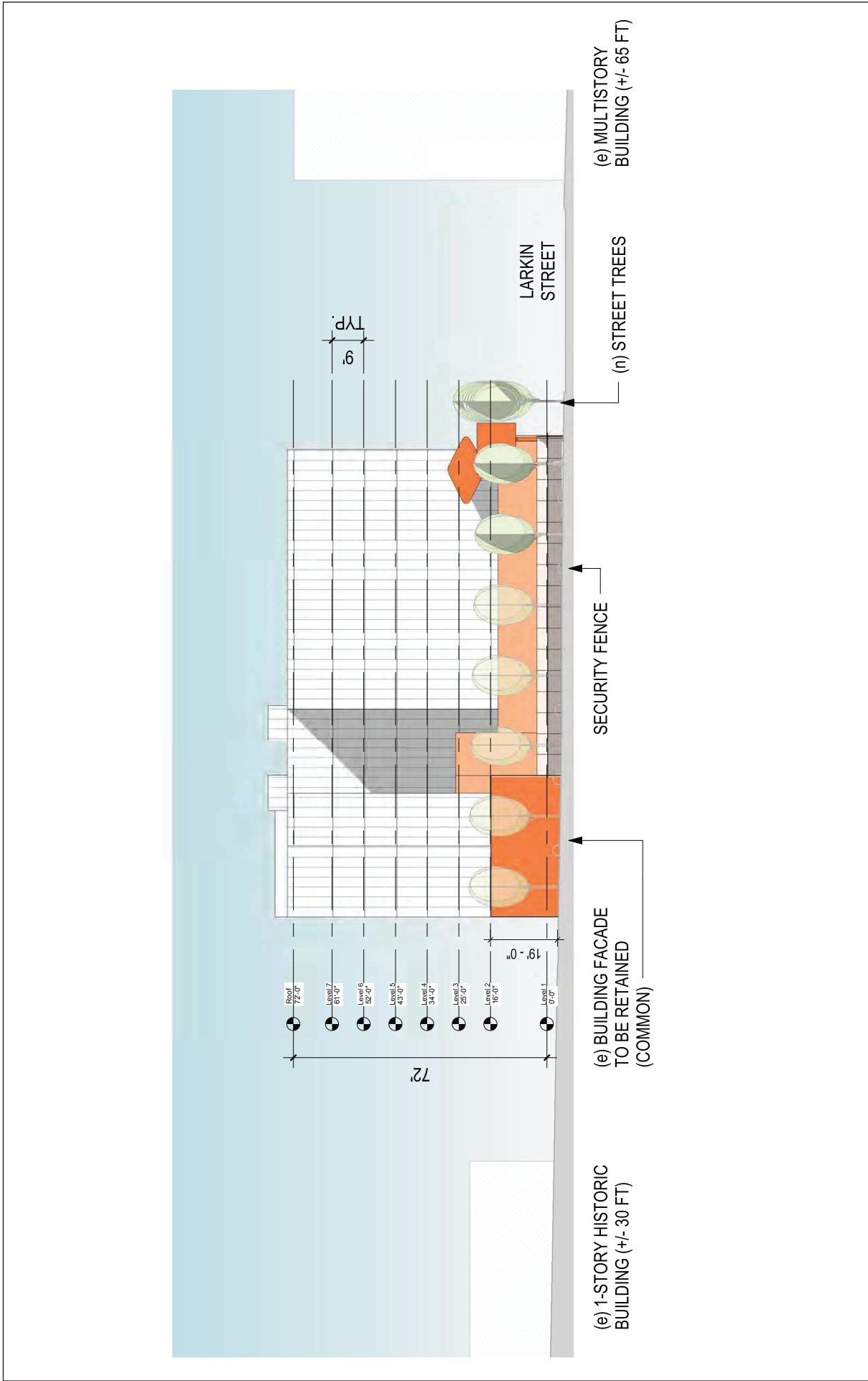


FIGURE VI-8a

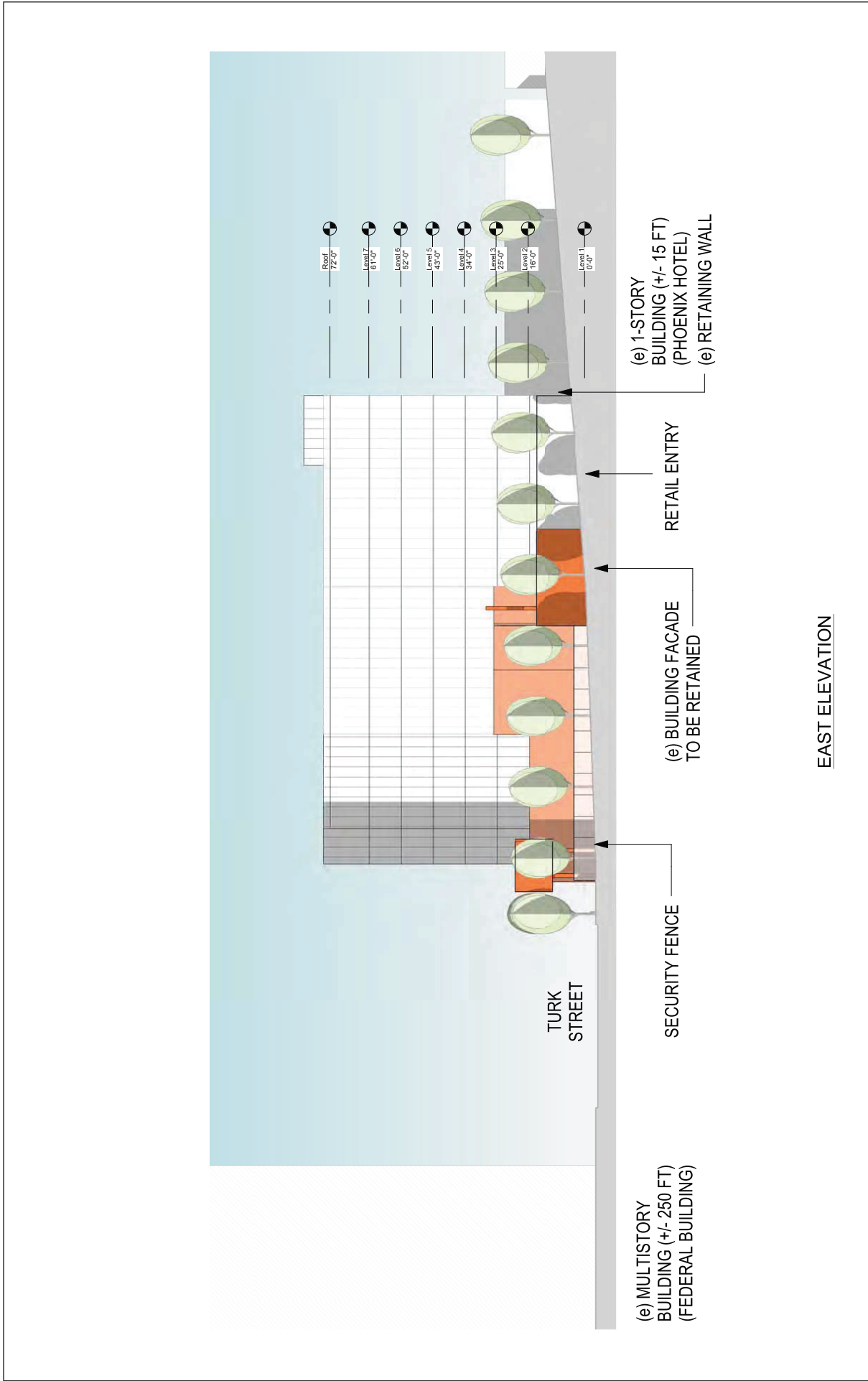


FIGURE VI-8b



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## Objectives

Similar to the Full Preservation Alternative, the Partial Preservation Alternative would partially meet the project objectives, but to a lesser extent than the proposed project. The Partial Preservation Alternative would result in the redevelopment of the site with affordable housing units, ground commercial space, common open space, and common residential amenity space, contributing to objectives related to the provision of a mix of uses on the site, accessible open space, and creation of a transit-oriented development. However, the Partial Preservation Alternative would provide approximately 52 fewer affordable residential units as compared to the proposed project, reducing the project sponsor's ability to meet project objectives related to economic feasibility, maximization of the number of affordable residential units in response to the current shortage of affordable housing, and provision of family-sized dwelling units. See Chapter II, Project Description, pp. 11–32, for a complete description of the project objectives.

## Impacts

Under the Partial Preservation Alternative, the majority of the L-shaped historic building would be preserved, with only the non-character-defining north façade concealed by new construction (a seven-story building). The existing building would also be enveloped to some extent by new construction (five- to six-story rooftop additions). This alternative would retain the building's L-shaped plan and would clearly differentiate the new construction. This alternative would retain the changeable sign at the southeast corner of the project site and the diamond-shaped Goodyear Tire sign atop the Larkin Street Wing, which have been identified as character-defining features in the 2017 HRER. Setbacks from the south façade of the Turk Street Wing and the Larkin Street Wing would also lend to the differentiation between the existing building and new construction that would rise above.

In keeping with the Secretary of the Interior's Standards for Rehabilitation, many character-defining features and materials of the existing building would be retained under this alternative including its L-shaped plan, a portion of stucco cladding with ornamental scoring, some of the steel-sash windows, Art Deco piers, some of the distinctive signage (see below), and the open vehicle

maneuvering area at the southeast corner (although no longer paved or used for vehicle maneuvering). The new seven-story residential tower alone would not infringe detrimentally on the existing building's significant form, massing, or spatial relationships. Moreover, this alternative would retain the changeable sign at the southeast corner of the project site and the diamond-shaped Goodyear Tire sign atop the Larkin Street Wing, which are identified in the 2017 HRER as character-defining features. However, the character-defining one- to two-story height would not be preserved, as the five- to six-story addition would rise from the roof of the existing building with only minimal setbacks in order to maximize the number of residential units provided under this alternative. Thus, the massing and visual impacts of the proposed five- to six-story addition, in combination with the seven-story residential tower, would arguably encroach and overshadow the existing building's significant form, massing, and spatial relationships.

Where character-defining features and materials, such as the steel-sash windows and the diamond-shaped Goodyear Tire sign atop the Larkin Street Wing, could be removed before construction, securely stored, and subsequently reinstalled, compatible replacement materials and features would be used should the original materials be extensively deteriorated and beyond reasonable repair.<sup>6</sup>

The Partial Preservation Alternative would not avoid but would substantially reduce the historic architectural resources impact that would result under the proposed project. The Partial Preservation Alternative would not avoid the significant impact altogether because although it would retain most of the historic building at 500 Turk Street and many of its character-defining features, the Partial Preservation Alternative would introduce a five- to six-story addition above the existing building and a seven-story residential tower to the north of the existing building, which, taken together, would adversely impact the integrity of feeling, setting, and design of the 500 Turk Street building. Therefore, under the Partial Preservation Alternative, it is assumed for the purposes of this draft EIR

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<sup>6</sup> As explained in the 2017 HRE, some of the steel-sash windows on the existing second story portion of the building may need to be replaced to accommodate residential use, but would be replaced with similarly styled windows made of thermally broken aluminum or metal sash.

that the integrity of the 500 Turk Street building, which has been determined to be individually eligible for listing on the CRHR and thus a historic resource under CEQA, would be substantially altered such that the building would no longer convey its significance as a historic resource under CEQA. Therefore, while the Partial Preservation Alternative would reduce the impact on the historic resource by retaining most of the existing building and many of its character-defining features, implementation of the Partial Preservation Alternative would nonetheless result in significant unavoidable project-level impact on historic architectural resources. In addition, the Partial Preservation Alternative would also result in the cumulative-level impact on historic architectural resources conservatively assumed in this draft EIR.

## **ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

Pursuant to CEQA Guidelines section 15126(e)(2), an EIR is required to identify the environmentally superior alternative from among the alternatives evaluated if the proposed project has significant impacts that cannot be mitigated to a less-than-significant level. The Environmentally Superior Alternative is the alternative that best avoids or lessens any significant effects of the proposed project, even if the alternative would impede to some degree the attainment of the project objectives. The No Project Alternative is considered the overall environmentally superior alternative because implementation of the proposed project would not occur with the No Project Alternative. The No Project Alternative, however, would not meet any of the project objectives.

If the No Project Alternative is environmentally superior, CEQA requires selection of the “environmentally superior alternative other than the no project alternative” from among the proposed project and the other alternatives evaluated. The proposed project would result in a significant and unavoidable project-level and cumulative impacts related to historic architectural resources. Although the Partial Preservation Alternative would result in a design that meets most of the project’s objectives, its implementation would nonetheless result in significant and unavoidable adverse impact. The Full Preservation Alternative would be the environmentally superior alternative because, unlike the proposed project or the Partial Preservation Alternative, it would result in less-than-significant impacts related to historic architectural resources as compared to the proposed

project, and **Mitigation Measures M-CP-1a, Documentation, M-CP-1b, Interpretive Display, and M-CP-1c, Salvage**, would not be required. In addition, potential conflicts with the general plan urban design element and Accountable Planning Initiative policies related to the preservation of historic resources would be avoided. Moreover, of the alternatives considered, the Full Preservation Alternative would require the least amount of physical alteration to the 500 Turk Street historic architectural resource. More specifically, the Full Preservation Alternative would include limited construction of a partial one-story addition to the existing Turk Street Wing of the building and a new seven-story residential tower abutting the north façade of the existing building, which is not a character-defining façade. As the alternative with the least amount of physical alteration and preservation of all of the character-defining features (with the exception of one of the Goodyear Tire signs), it would result in the fewest impacts on the historic resource.

## ALTERNATIVES CONSIDERED BUT REJECTED

Pursuant to CEQA Guidelines section 15126.6(c), an EIR should “identify any alternatives that were considered by the lead agency but rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination.” The screening process for identifying viable EIR alternatives included consideration of the following criteria: ability to meet the project objectives; potential ability to substantially lessen or avoid significant environmental effects associated with the proposed project; and potential feasibility. The discussion below describes the alternatives considered, and provides the reasons for eliminating these alternatives from detailed consideration in the EIR.

- *Off-Site Alternative.* An off-site alternative would consist of a similar project design and programming, but in a different though comparable infill location within the city. An off-site alternative was considered and rejected because the project sponsor does not have any site under its control that does not already have an application pending or an affordable housing development otherwise proposed. The nature of the project sponsor's work is to continuously identify and acquire properties that are suitable for residential development to achieve the goal of helping to meet the pressing need for more affordable housing in San Francisco. It would be contrary to that goal to use an alternate site for this affordable

housing project because that would preclude the development of other (net new) affordable housing units on that future or existing project site.

- *Partial Preservation Alternative with Standalone Building.* While not technically a separate alternative, because a standalone building was considered but rejected as part of the Partial Preservation Alternative, the following is provided for informational purposes. At the request of planning department historic preservation staff, the project sponsor considered the insertion of a short standalone building in the open lot in the southeast corner for the purpose of housing the proposed commercial, residential support, residential amenity spaces, and/or residential units. Although building within the open lot would remove a character-defining feature, such an approach could have succeeded in partially preserving the historic resource if the separation between the historic building and the standalone building were sufficient to allow a perceptive viewer to understand that the lot had historically been an open vehicle maneuvering area.<sup>7</sup> After assessing what could realistically be built in this space, however, the project sponsor found that inserting a standalone building would create only approximately two additional residential units, and would result in a host of significant problems related to security, operations, additional construction costs, negative impacts on the quality of the common space for residents of the project, reduced potential for internal community building. Furthermore, if the standalone building were to be a commercial building, it would inevitably place an undue emphasis on retail uses, which is inconsistent with the sponsor's mission of providing affordable housing. Therefore, such a component of the Partial Preservation Alternative was rejected because the creation of the standalone building in the open southeast lot would not be feasible and would not further the project objectives.

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<sup>7</sup> San Francisco Planning Department, Meeting Notes from the Review and Comment at the August 2, 2017 ARC meeting for 500 Turk Street Residential Project Preservation Alternatives Draft EIR, Case No. 2016-010340ENV, August 8, 2017.

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## VII. REPORT 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  
Architectural Historian: Michael Hibma, RPH  
Planner: Matt Kawashima  
Support Staff: Patty Linder, Charis Hanshaw

### PROJECT SPONSOR

**Tenderloin Neighborhood Development Corporation**

201 Eddy Street  
San Francisco, CA 94102

Project Sponsor: Daniel Findley

### SPONSOR'S ATTORNEY

Coblentz Patch Duffy & Bass LLP  
One Montgomery Street, Suite 3000  
San Francisco, CA 94104

Project Attorneys: Caroline Guibert Chase and Tay Via

## ARCHITECT

### David Baker Architects

461 Second Street #2

San Francisco, CA 94107

Project Architects: Katie Ackerly, LEED, AP, CPHC

Designer: Won Young Kim



**APPENDIX A**  
**NOTICE OF PREPARATION/INITIAL STUDY**





# SAN FRANCISCO PLANNING DEPARTMENT

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## 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

1650 Mission St.  
Suite 400  
San Francisco,  
CA 94103-2479

Reception:  
**415.558.6378**

Fax:  
**415.558.6409**

Planning  
Information:  
**415.558.6377**

### 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](mailto: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  
Date

  
Lisa Gibson  
Environmental Review Officer

# INITIAL STUDY TABLE OF CONTENTS

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## 500 Turk Street

<u>SECTION</u>	<u>PAGE</u>
ACRONYMS AND ABBREVIATIONS .....	iii
A. PROJECT SITE .....	2
B. PROPOSED PROJECT .....	7
C. PROJECT APPROVALS .....	18
D. PROJECT SETTING .....	20
E. CUMULATIVE SETTING .....	21
F. COMPATIBILITY WITH ZONING AND PLANS .....	24
G. SUMMARY OF ENVIRONMENTAL EFFECTS .....	33
H. EVALUATION OF ENVIRONMENTAL EFFECTS .....	37
1. LAND USE AND LAND USE PLANNING .....	37
2. POPULATION AND HOUSING .....	39
3. CULTURAL RESOURCES .....	43
4. TRANSPORTATION AND CIRCULATION .....	54
5. NOISE .....	67
6. AIR QUALITY .....	84
7. GREENHOUSE GAS EMISSIONS .....	107
8. WIND AND SHADOW .....	112
9. RECREATION .....	116
10. UTILITIES AND SERVICE SYSTEMS .....	118
11. PUBLIC SERVICES .....	123
12. BIOLOGICAL RESOURCES .....	127
13. GEOLOGY AND SOILS .....	131
14. HYDROLOGY AND WATER QUALITY .....	138
15. HAZARDS AND HAZARDOUS MATERIALS .....	143
16. MINERAL AND ENERGY RESOURCES .....	152
17. AGRICULTURE AND FOREST RESOURCES .....	154
18. MANDATORY FINDINGS OF SIGNIFICANCE .....	155
I. MITIGATION MEASURES AND IMPROVEMENT MEASURES .....	157
J. PUBLIC NOTICE AND COMMENT .....	168
K. DETERMINATION .....	169
L. INITIAL STUDY PREPARERS .....	170

**LIST OF FIGURES**

**PAGE**

Figure 1: Project Location and Regional Vicinity Map .....3  
Figure 2: Aerial Photograph of Project Site and Surrounding Land Uses .....4  
Figure 3: Existing Site Conditions .....5  
Figure 4: Conceptual Ground Floor Plan .....9  
Figure 5: Conceptual Upper Floor Plan.....10  
Figure 6: Conceptual Roof Plan .....11  
Figure 7a: Conceptual Building Elevations.....12  
Figure 7b: Conceptual Building Elevations.....13  
Figure 8: Circulation and Parking Plan .....16  
Figure 9: Cumulative Projects Map.....23

**LIST OF TABLES**

**PAGE**

Table 1: Proposed Project Details .....7  
Table 2: Cumulative Projects in the Project Vicinity .....22  
Table 3: Land Use Compatibility Chart for Community Noise, dBA.....71  
Table 4: Ambient Noise Monitoring Results, dBA .....74  
Table 5: Meteorological Conditions During Ambient Noise Monitoring .....75  
Table 6: Typical Construction Equipment Maximum Noise Levels, L<sub>max</sub> .....78  
Table 7: Criteria Air Pollutant Significance Thresholds .....86  
Table 8: Comparison of Proposed Project to BAAQMD Criteria Air Pollutants and  
Precursors Construction and Operational Screening Level Criteria.....96

## ACRONYMS AND ABBREVIATIONS

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AB	Assembly Bill
ABAG	Association of Bay Area Governments
ADRP	Archeological Data Recovery Plan
AMI	Area Median Income
ARB	California Air Resources Board
ATP	Archeological Testing Plan
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
BMPs	best management practices
CAA	Clean Air Act
Cal/OSHA	State Occupational Safety and Health Administration
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
CCAA	California Clean Air Act
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CRHR	California Register of Historic Resources
dB	Decibel
dBA	decibel (A-weighted)
DBI	Department of Building Inspection
DPM	diesel particulate matter
ERO	Environmental Review Officer
ESLs	Environmental Screening Levels
FARR	Final Archeological Resource Report
FTA	Federal Transit Administration
g/bhp-hr	grams per brake horsepower-hour
g/hp-hr	grams per horsepower-hour
GHG	greenhouse gas
HEPA	High Efficiency Particulate Air Filter
hp	horsepower
in/sec	inches per second
ISCOTT	Interdepartmental Staff Committee on Traffic and Transportation
L <sub>dn</sub>	day-night noise level
L <sub>eq</sub>	equivalent continuous sound level
MLD	Most Likely Descendant
mph	miles per hour
MRZ-4	Mineral Resource Zone 4
MTC	Metropolitan Transportation Commission
MTCO <sub>2</sub> E	metric ton of carbon dioxide equivalents
Muni	San Francisco Municipal Railway
NAHC	California State Native American Heritage Commission
NO <sub>x</sub>	oxides of nitrogen
NO <sub>2</sub>	nitrogen dioxide

NOP/IS	Notice of Preparation/Initial Study
NPDES	National Pollutant Discharge Elimination System
NSR	New Source Review
NWIC	Northwest Information Center
OPR	State Office of Planning and Research
PAR	Preliminary Archeological Review
PCBs	polychlorinated biphenyls
PM	particulate matter
PM <sub>2.5</sub>	PM composed of particulates that are 10 microns in diameter or less
PM <sub>10</sub>	PM composed of particulates that are 2.5 microns in diameter or less
PPV	peak particle velocity
QACL	Qualified Archeological Consultants List
RMS	root mean square
ROG	reactive organic gases
RWQCB	Bay Area Regional Water Quality Control Board
SB	Senate Bill
SFCTA	San Francisco County Transportation Authority
SFDPH	San Francisco Department of Public Health
SFMTA	San Francisco Municipal Transportation Agency
SFPD	San Francisco Police Department
SFPUC	San Francisco Public Utilities Commission
SMP	site mitigation plan
SO <sub>2</sub>	sulfur dioxide
TACs	toxic air contaminants
TSF	Transportation Sustainability Fee
U.S. 101	U.S. Highway 101
U.S. EPA	U.S. Environmental Protection Agency
VMT	vehicle miles traveled



**Initial Study**  
**500 Turk Street Project**  
Planning Department Case No. 2016-010340ENV

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).<sup>1</sup>

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

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<sup>1</sup> 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](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.

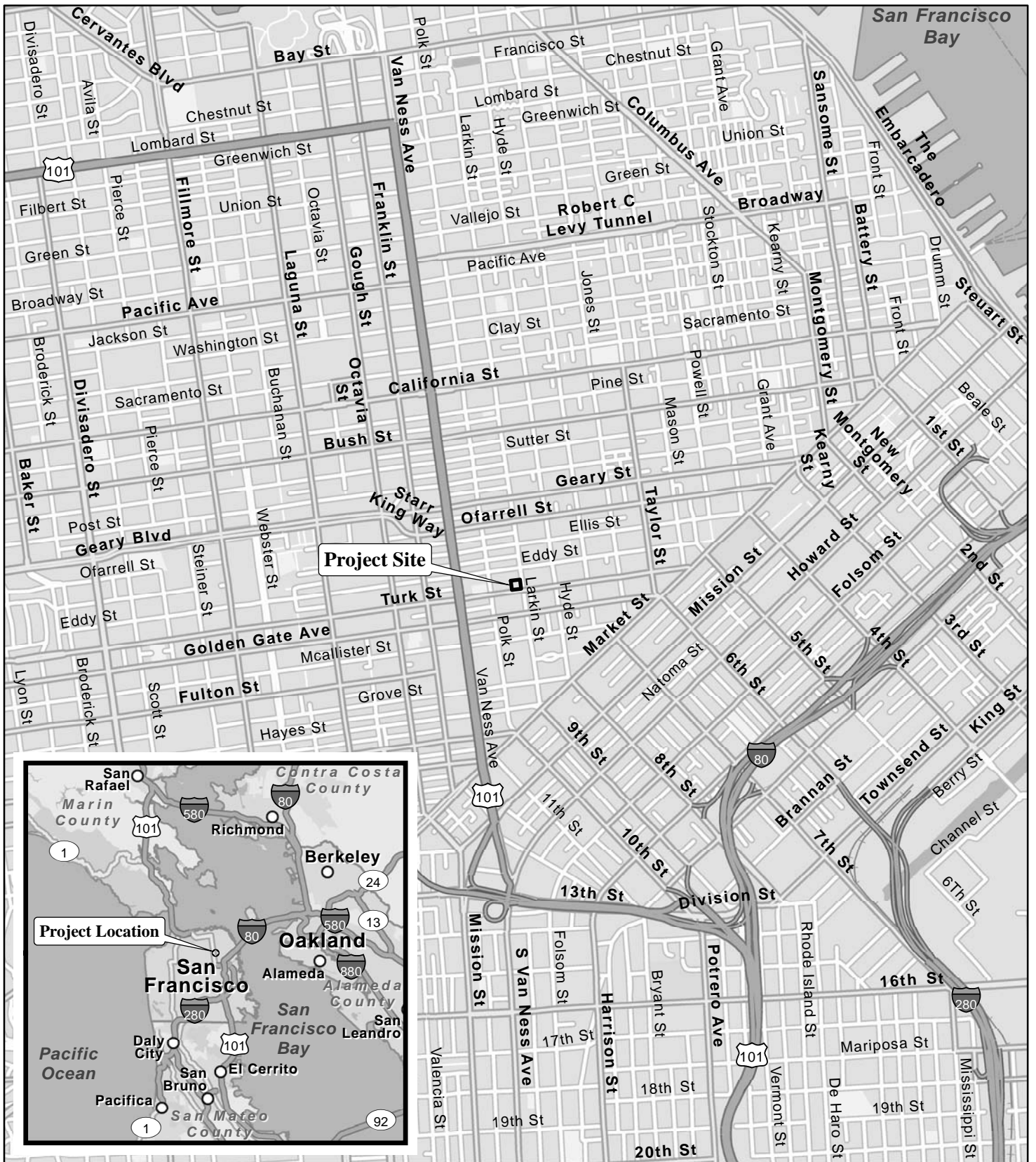
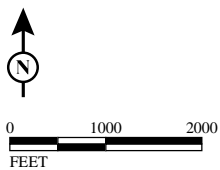


FIGURE 1



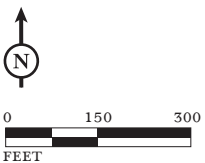
SOURCE: ESRI StreetMap North America (2012).

500 Turk Street Project  
Project Location and Regional Vicinity Map





FIGURE 2



 Project Site

*500 Turk Street Project*  
 Aerial Photograph of Project Site  
 and Surrounding Land Uses

SOURCES: GOOGLE EARTH, JULY 2016; LSA ASSOCIATES, INC., 2017.



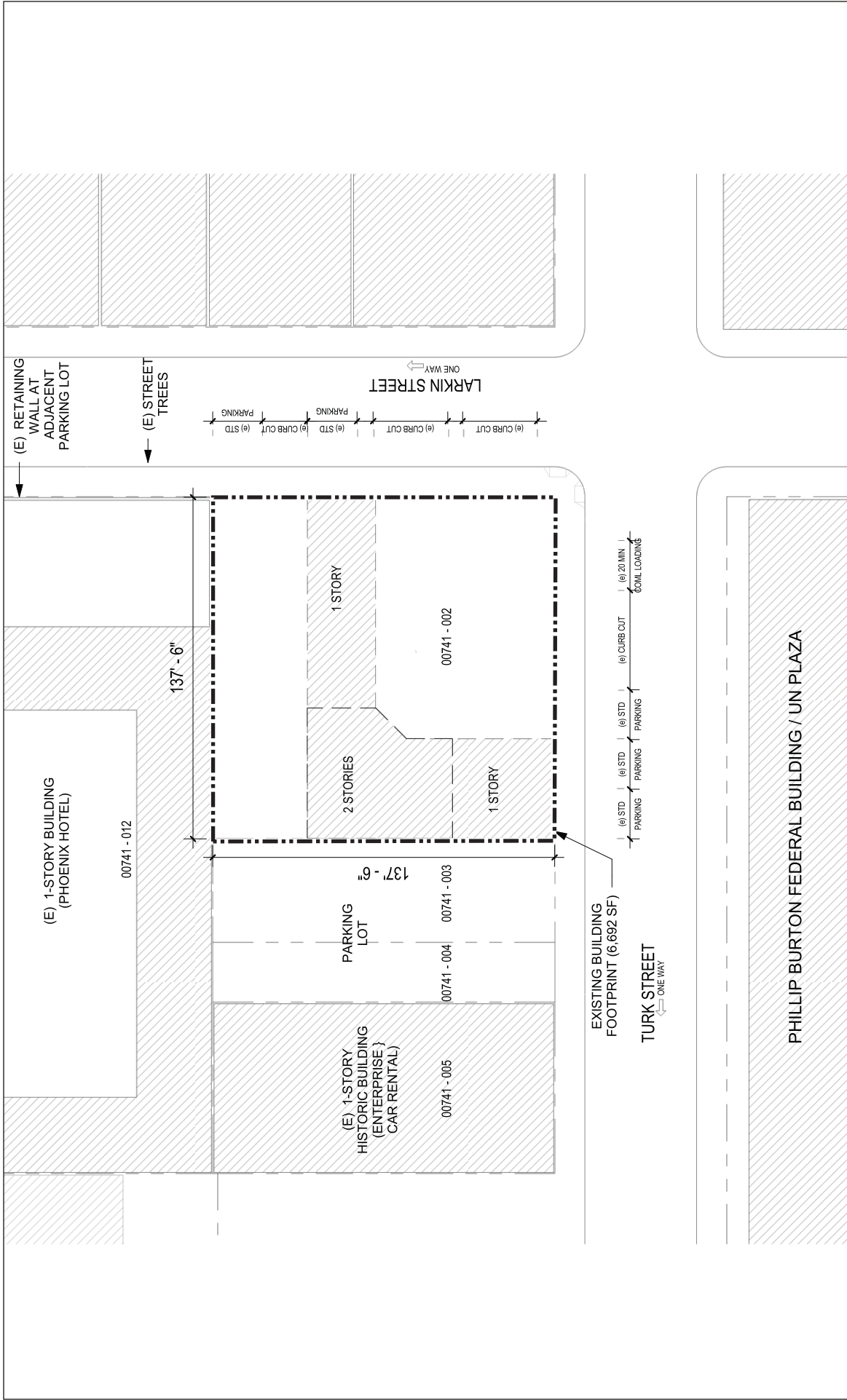


FIGURE 3

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.<sup>2</sup> 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)<sup>3</sup> 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.<sup>4</sup>

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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<sup>2</sup> 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.

<sup>3</sup> Historic resource categories for CEQA review are defined in *San Francisco Preservation Bulletin No. 16*, May 5, 2004. Available at [http://default.sfplanning.org/Preservation/bulletins/HistPres\\_Bulletin\\_16.PDF](http://default.sfplanning.org/Preservation/bulletins/HistPres_Bulletin_16.PDF).

<sup>4</sup> 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**

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

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 4

500 Turk Street Project  
 Conceptual Ground Floor Plan

NOT TO SCALE  
 N

SOURCES: DAVID BAKER ARCHITECTS; TNDC, JUNE 2017.



FIGURE 5

NOT TO SCALE

500 Turk Street Project  
 Conceptual Upper Floor Plan

SOURCES: DAVID BAKER ARCHITECTS; TNDC, JUNE 2017.

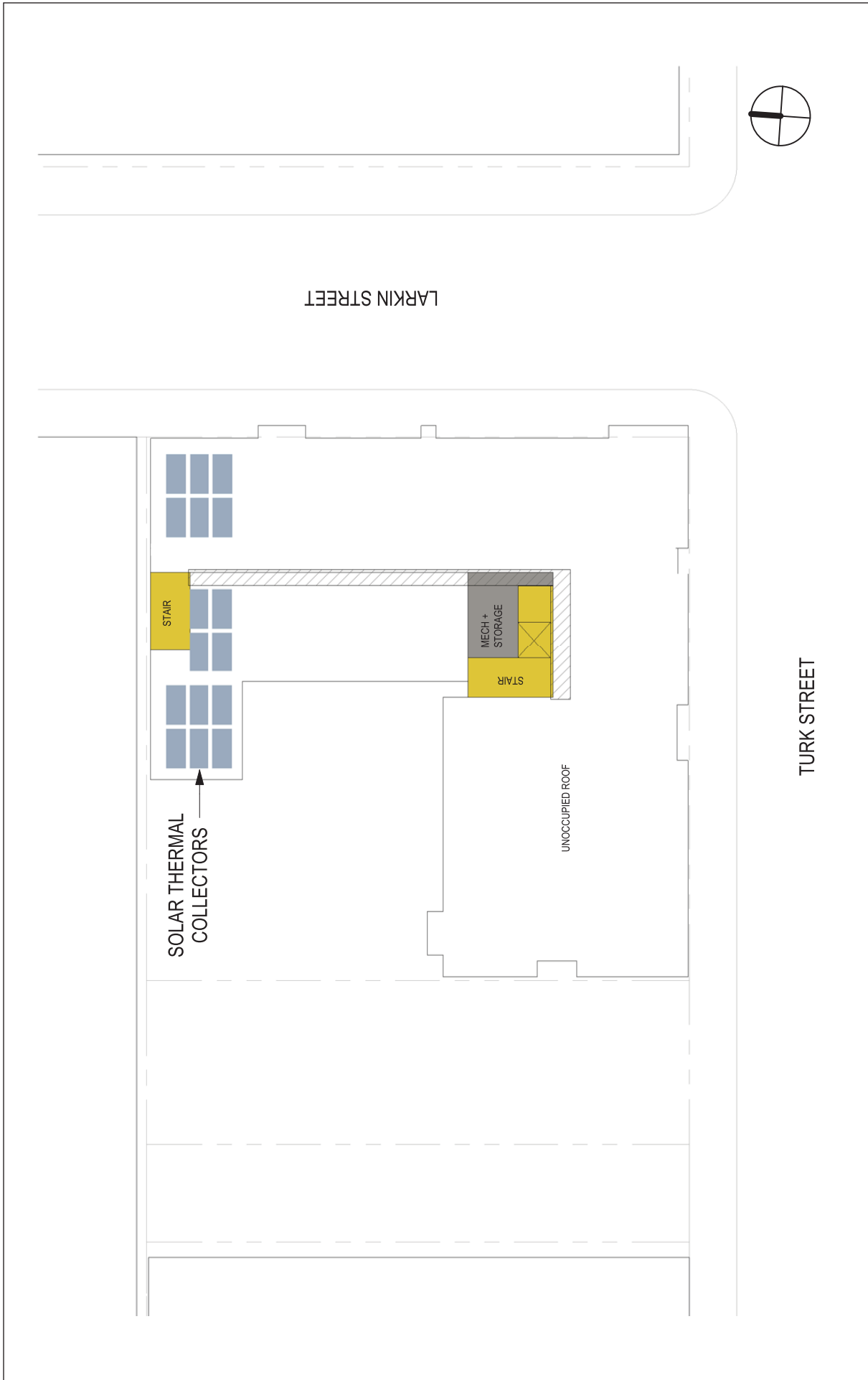


FIGURE 6

NOT TO SCALE  


500 Turk Street Project  
 Conceptual Roof Plan

SOURCE: DAVID BAKER ARCHITECTS, JUNE 2017.

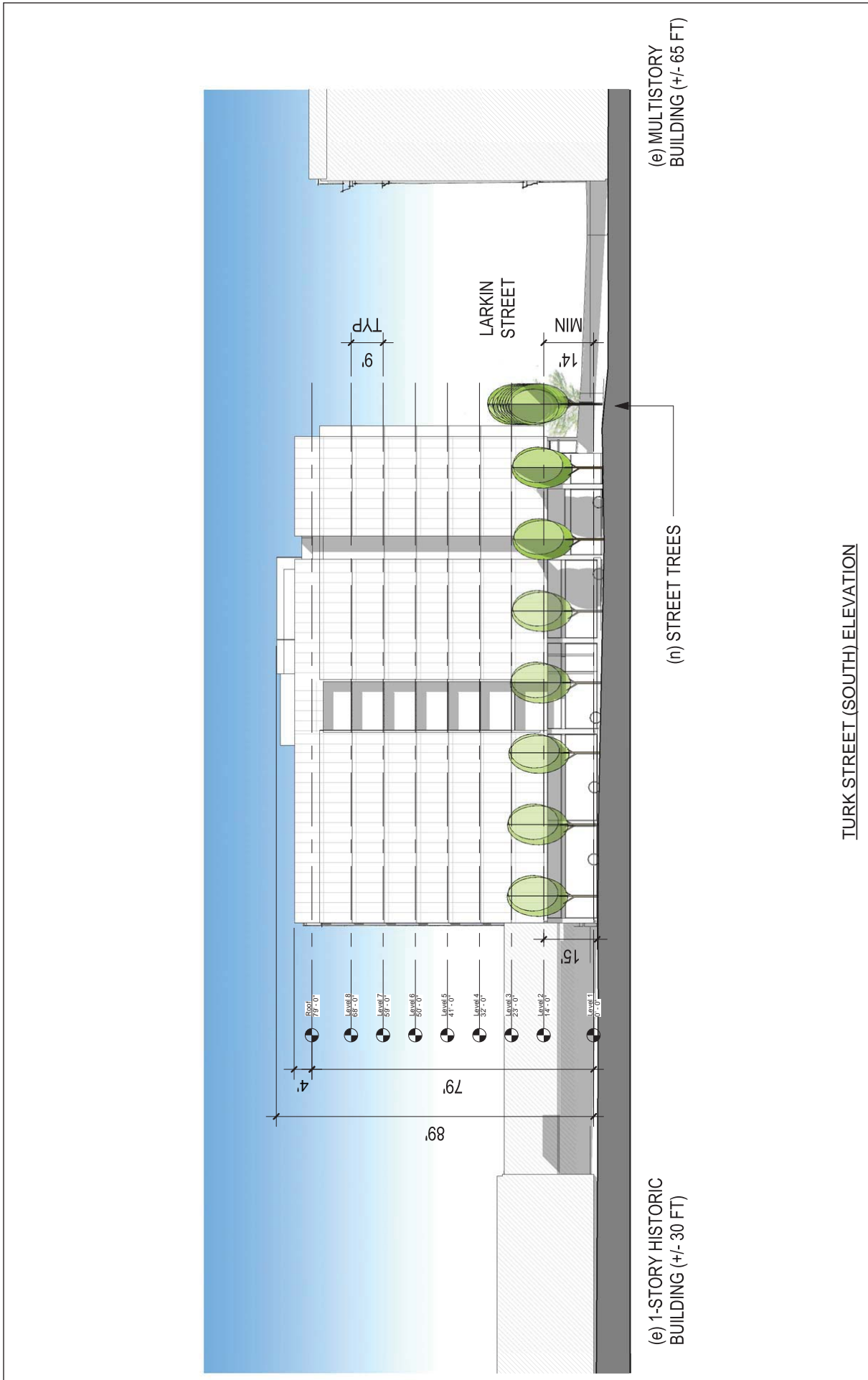


FIGURE 7a

NOT TO SCALE

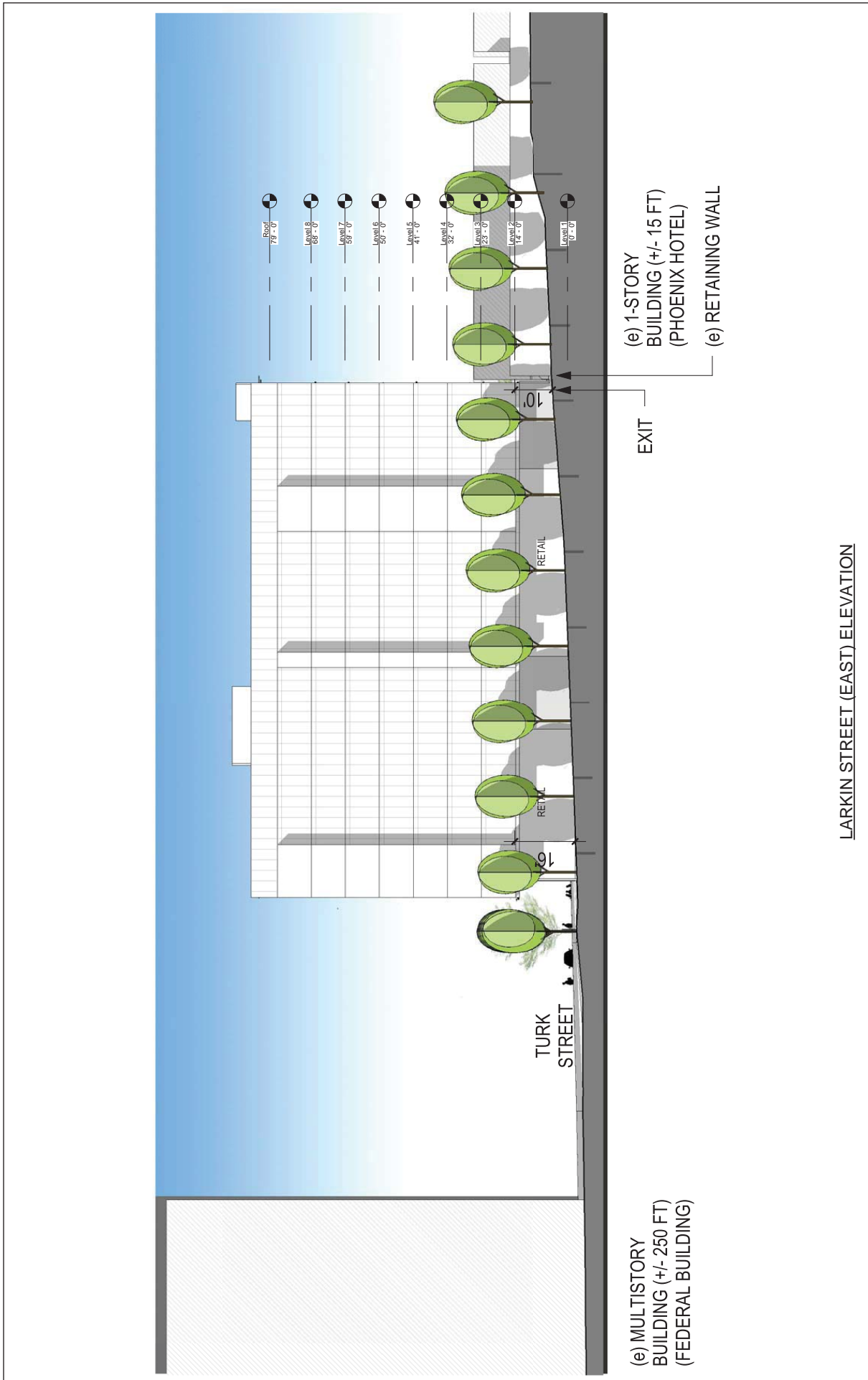


FIGURE 7b

NOT TO SCALE

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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.

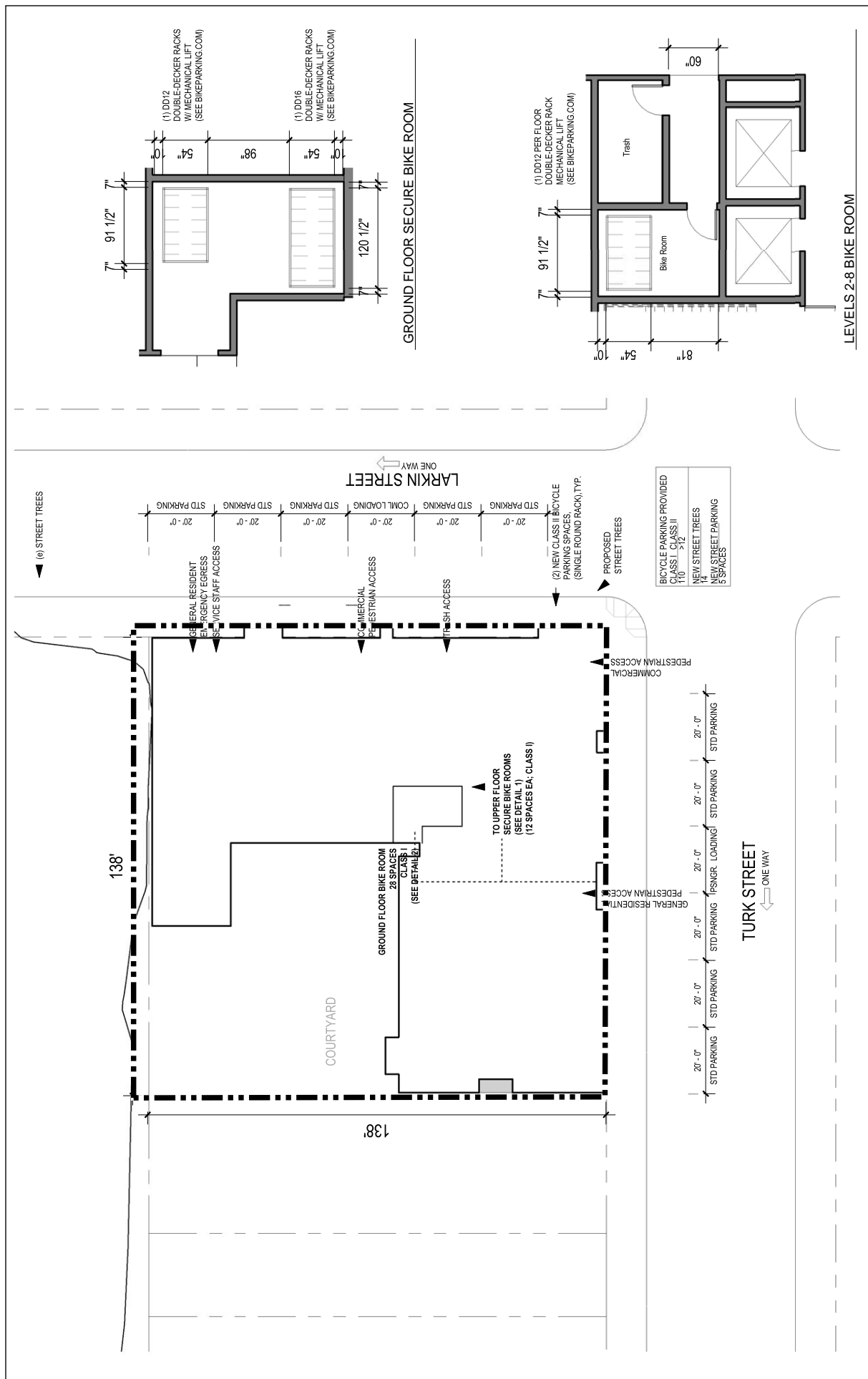


FIGURE 8

Project Site Boundary

500 Turk Street Project

Circulation and Parking Plan

NOT TO SCALE

SOURCE: DAVID BAKER ARCHITECTS, JUNE 2017.



The project would include 110 secured *class 1* bicycle parking spaces and 12 *class 2* (on-sidewalk) bicycle parking spaces.<sup>5</sup> 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<sup>6</sup> 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<sup>7</sup> prepared for the proposed project. Construction of the proposed project is anticipated to occur over a 22-month period.

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<sup>5</sup> *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.

<sup>6</sup> 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.

<sup>7</sup> 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.

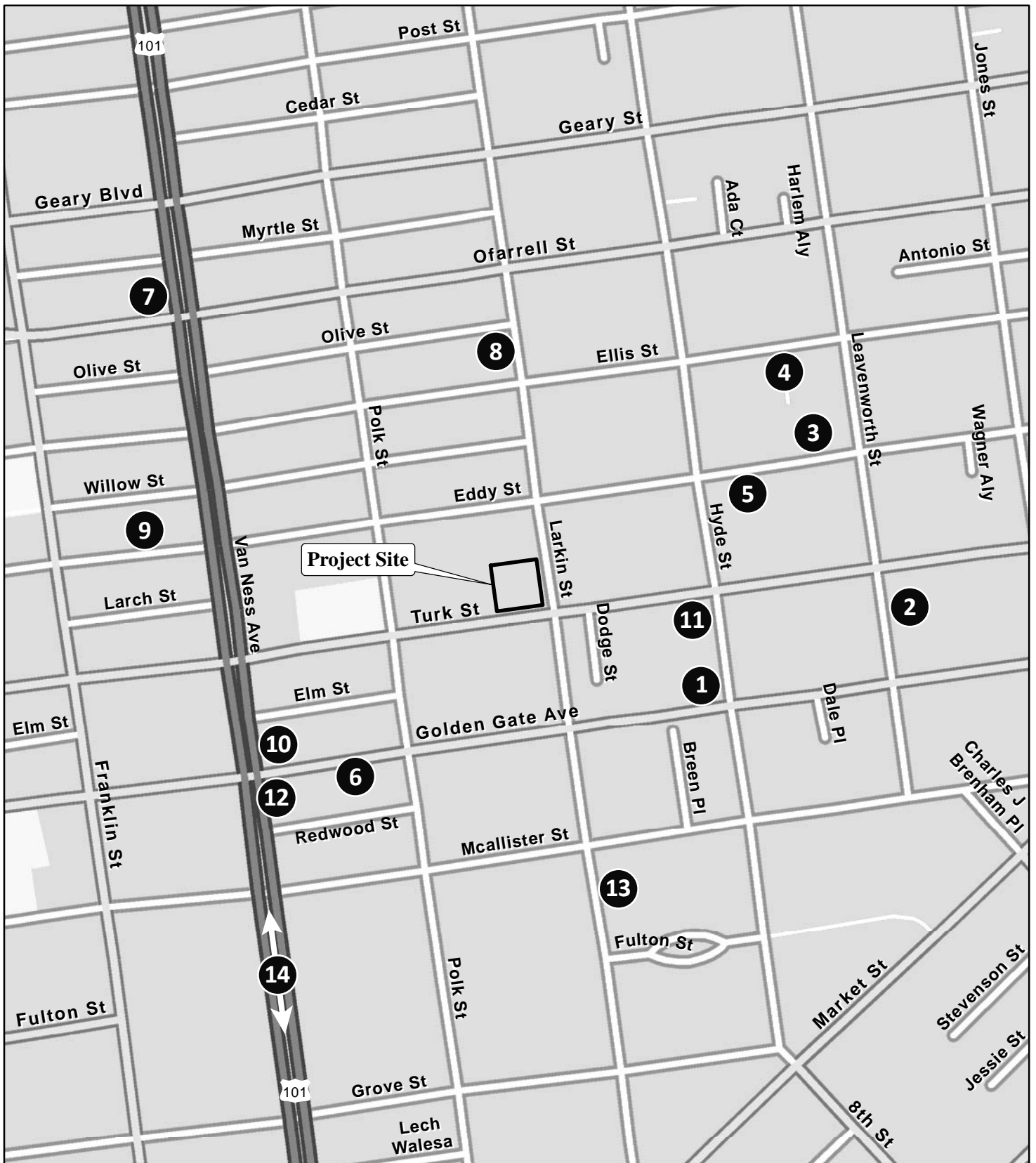
## E. CUMULATIVE SETTING

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**

Cumulative Project No. (see Figure II-9)	Address	Case No.	Project Status Environmental Review	Net New Dwelling Units	Net New Commercial Space (Sq. Ft.)	Description
1	101 Hyde St (1 block away)	2012.0086X	Complete	85	4,923	New 8-story residential building with ground-floor retail space.
2	145 Leavenworth St (2 blocks away)	2012.1531X	Complete	94	3,776	New 8-story residential building with group housing rooms and ground-floor retail space.
3	430 Eddy St (2 blocks away)	2014.0400CUA	Complete	22	0	New 8-story residential building.
4	519 Ellis St (3 blocks away)	2014.0506CUA	Complete	28	2,547	New 8-story residential building with ground-floor commercial space.
5	469 Eddy St (2 blocks away)	2014.0562CUA	Complete	29	2,600	New 8-story residential building with ground-floor retail space.
6	555 Golden Gate Ave (2 blocks away)	2014.1102E, CUA	Underway	52	1,000	Demolition of a commercial building and construction of a 10-story residential building with ground-floor commercial space.
7	1001 Van Ness Ave (6 blocks away)	2014.1305CUA	Complete	239	5,100	Demolition of a 4-story commercial building and construction of a 14-story residential building with commercial space.
8	719 Larkin St (3 blocks away)	2015-005329CUA	Complete	42	1,400	Demolition of a commercial building and construction of an 8-story residential building with ground-floor commercial space.
9	830 Eddy St (4 blocks away)	2015-009460CUA	Complete	126	0	Construction of a 15-story residential building.
10	600 Van Ness (2 blocks away)	2015-012729ENV, CUA	Underway	152	5,894	Demolition of a commercial building and construction of a 12-story residential building with ground-floor commercial space.
11	135 Hyde St (1 block away)	2015-015203DNX, ENV	Underway	72	910	Demolition of a one-story garage and construction of an 8-story residential building with ground-floor commercial space.
12	540 Van Ness Ave (3 blocks away)	2016-015569PPA	Underway	103	8,710	Demolition of two of three existing commercial buildings and construction of residential building with ground-floor retail space.
13	200 Larkin St (3 blocks away)	2015-015229ENV	Complete	0	0	12,000 sf addition to the Asian Art Museum.
			<b>Total</b>	<b>1,044</b>	<b>36,860</b>	

Source: San Francisco Planning Department, *Cumulative Projects List*, June 13, 2017.



- |                              |                               |  |
|------------------------------|-------------------------------|--|
| <b>1</b> 101 Hyde St.        | <b>6</b> 555 Golden Gate Ave. | <b>11</b> 135 Hyde St.                     |
| <b>2</b> 145 Leavenworth St. | <b>7</b> 1001 Van Ness Ave.   | <b>12</b> 540 Van Ness Ave.                |
| <b>3</b> 430 Eddy St.        | <b>8</b> 719 Larkin St.       | <b>13</b> 200 Larkin St.                   |
| <b>4</b> 519 Ellis St.       | <b>9</b> 830 Eddy St.         | <b>14</b> Van Ness Bus Rapid Transit (BRT) |
| <b>5</b> 469 Eddy St.        | <b>10</b> 600 Van Ness Ave.   |  |

FIGURE 9

*500 Turk Street Project  
Cumulative Projects Map*

SOURCE: ESRI StreetMap North America (2012).

**F. COMPATIBILITY WITH ZONING AND PLANS**

	<i>Applicable</i>	<i>Not Applicable</i>
Discuss any variances, special authorizations, or changes proposed to the Planning Code or Zoning Map, if applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**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.<sup>8</sup> 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.<sup>9</sup>

### 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.<sup>10</sup>

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<sup>8</sup> California, State of, SB-743, [http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201320140SB743](http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB743), accessed June 23, 2017.

<sup>9</sup> 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.

<sup>10</sup> 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

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
<b>1. LAND USE AND LAND USE PLANNING— Would the project:</b>					
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**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.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>2. POPULATION AND HOUSING— Would the project:</b>					
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>2. POPULATION AND HOUSING— Would the project:</b>					
b) Displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**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,<sup>11</sup> 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.<sup>12</sup> 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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<sup>11</sup> 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.

<sup>12</sup> The population estimate is based on data from the 2015 Census (ACS 2015 5-year) for Census Tract 124.02.



840,763.<sup>13</sup> 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<sup>14</sup> and approximately 11 employees associated with the residential use,<sup>15</sup> 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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<sup>13</sup> United States Census Bureau, American Fact Finder, San Francisco, California, 2011-2015 American Community Survey 5-Year Estimates, August 6, 2017, [https://factfinder.census.gov/faces/nav/jsf/pages/community\\_facts.xhtml?src=bkmk](https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml?src=bkmk), accessed August 6, 2017.

<sup>14</sup> United States Green Building Council, Building Area per Employee by Business Type, May 13, 2008, <https://www.usgbc.org/Docs/Archive/General/Docs4111.pdf>, accessed August 6, 2017. Assumes one employee per 383 square feet of community retail use.

<sup>15</sup> Findley, Daniel, Tenderloin Neighborhood Development Corporation. August 3, 2017.

**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.<sup>16</sup> 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.<sup>17</sup> 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.

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<sup>16</sup> Assumes the City of San Francisco average of 2.26 persons per household.

<sup>17</sup> Association of Bay Area Governments and Metropolitan Transportation Commission, *Plan Bay Area—Strategy for a Sustainable Region* (p. 40), July 18, 2013, [http://mtc.ca.gov/sites/default/files/2-The\\_Bay\\_Area\\_In\\_2040.pdf](http://mtc.ca.gov/sites/default/files/2-The_Bay_Area_In_2040.pdf), accessed June 23, 2017.

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.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
<b>3. CULTURAL RESOURCES— Would the project:</b>					
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code §21074?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**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)<sup>18</sup> and assigned Status Code of 3CS, meaning that it appears eligible for inclusion in the CRHR as an individual property through survey evaluation.

<sup>18</sup> Kostura, William, Architectural Historian, *Van Ness Auto Row Support Structures: A Survey of Automobile-Related Buildings along the Van Ness Avenue Corridor*, 2010.

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 (HREER) 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).<sup>19</sup> 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.<sup>20</sup> 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.<sup>21</sup>

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<sup>19</sup> Historic resource categories for CEQA review are defined in *San Francisco Preservation Bulletin No. 16*, May 5, 2004. Available at [http://default.sfplanning.org/Preservation/bulletins/HistPres\\_Bulletin\\_16.PDF](http://default.sfplanning.org/Preservation/bulletins/HistPres_Bulletin_16.PDF).

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

<sup>21</sup> *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.<sup>22</sup> 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.<sup>23</sup> 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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<sup>22</sup> Langan Engineering and Environmental Services, Inc. *Geotechnical Investigation 500 Turk Street San Francisco, California*. December 21, 2016.

<sup>23</sup> 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 site<sup>24</sup> associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group, an appropriate representative<sup>25</sup> 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

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

<sup>25</sup> 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. 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.

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.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>4. TRANSPORTATION AND CIRCULATION— Would the project:</b>					
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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.<sup>26</sup> *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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<sup>26</sup> 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.<sup>27</sup> *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.<sup>28</sup>

### **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<sup>29</sup> (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:<sup>30</sup>

- 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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<sup>27</sup> California Department of Transportation, *Highway Design Manual – Chapter 1000 Bikeway Planning and Design*, June 26, 2006.

<sup>28</sup> San Francisco Municipal Transportation Agency, *San Francisco Bike Network Map*, <https://www.sfmta.com/maps/san-francisco-bike-network-map>, accessed June 23, 2017.

<sup>29</sup> California Governor’s Office of Planning & Research, “Updating the Analysis of Transportation Impacts Under CEQA,” [https://www.opr.ca.gov/s\\_sb743.php](https://www.opr.ca.gov/s_sb743.php), accessed June 23, 2017.

<sup>30</sup> San Francisco Planning Commission Resolution 19579, Transportation Sustainability Program, adopted on March 3, 2016.



- 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.<sup>31,32</sup>

**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

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

<sup>32</sup> San Francisco Planning Department, *Executive Summary: Resolution Modifying Transportation Impact Analysis, Appendix F, Attachment A*, March 3, 2016; signed March 30, 2017.

determination<sup>33</sup> 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.<sup>34</sup> As documented in the proposed transportation impact guidelines, a 15 percent threshold below existing development is “both reasonably ambitious and generally achievable.”<sup>35</sup>

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:

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<sup>33</sup> San Francisco Planning Department, *Transportation Study Determination Case No. 2016-010340ENV*, 500 Turk Street, 415.558.6378, March 3, 2017.

<sup>34</sup> 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.

<sup>35</sup> Governor’s Office of Planning and Research, *Revised Proposal on Updates to CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, January 20, 2016, p. III:20, [https://www.opr.ca.gov/docs/Revised\\_VMT\\_CEQA\\_Guidelines\\_Proposal\\_January\\_20\\_2016.pdf](https://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf), accessed June 23, 2017.

- 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<sup>36</sup> 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.<sup>37</sup>

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<sup>36</sup> 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.

<sup>37</sup> 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.<sup>38</sup> 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.<sup>39</sup>

### **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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<sup>38</sup> 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](http://commissions.sfplanning.org/cpcpackets/Align-CPC%20exec%20summary_20160303_Final.pdf), accessed June 23, 2017.

<sup>39</sup> 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](http://www.511.org), participating in emergency ride home program through the City of San Francisco ([www.sferh.org](http://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).<sup>40</sup> 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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<sup>40</sup> 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.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>5. NOISE— Would the project:</b>					
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Be substantially affected by existing noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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.<sup>41</sup>

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.<sup>42</sup> 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.<sup>43</sup>

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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<sup>41</sup> 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.

<sup>42</sup> Vibration velocity level is reported in decibels relative to a level of  $1 \times 10^{-6}$  inches per second and is denoted as VdB.

<sup>43</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006, pp. 8-1 to 8-3, Table 8-1; [https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA\\_Noise\\_and\\_Vibration\\_Manual.pdf](https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf), accessed June 23, 2017.

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.<sup>44</sup> 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.<sup>45</sup>

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.<sup>46</sup> Although the FTA guidelines are

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<sup>44</sup> Ibid, pp. 2-13 to 2-17

<sup>45</sup> Ibid. p. 12-1.

<sup>46</sup> 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.<sup>47</sup> 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.”<sup>48</sup>

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  $L_{dn}$  for residential and hotel uses; 65 dBA  $L_{dn}$  for schools, classrooms, libraries, churches and hospitals; 70 dBA  $L_{dn}$  for playgrounds, parks, offices, retail commercial uses, and noise-sensitive manufacturing/communication uses; and 77 dBA  $L_{dn}$  for other commercial uses such as wholesale, certain retail, industrial/manufacturing, transportation, communications, and utilities uses.<sup>49</sup> The land use compatibility chart notes that at

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<sup>47</sup> City and County of San Francisco, *City of San Francisco General Plan*, December 2, 2004.

<sup>48</sup> *Ibid.*





<sup>49</sup> Day/Night Noise Level ( $L_{dn}$ ) 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<sub>dn</sub>, 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**

LAND USE CATEGORY	Sound Levels and Land Use Consequences (see explanation below)						
	L <sub>dn</sub> Value in Decibels						
	55	60	65	70	75	80	85
<b>Residential - All Dwellings, Group Quarters</b>							
<b>Transient Lodging - Motels, Hotels</b>							
<b>School Classrooms, Libraries, Churches, Hospitals, Nursing Homes, etc.</b>							
<b>Auditoriums, Concert Halls, Amphitheaters, Music Shells</b>							
<b>Sports Arenas, Outdoor Spectator Sports</b>							
<b>Playgrounds, Parks</b>							
<b>Golf Courses, Riding Stables, Water-based Recreation Areas, Cemeteries</b>							
<b>Office Buildings - Personal, Business and Professional Services</b>							
<b>Commercial - Retail, Movie Theatres, Restaurants</b>							
<b>Commercial - Wholesale and some Retail, Industrial/Manufacturing, Transportation, Communications and Utilities</b>							
<b>Noise Sensitive Manufacturing and Communications</b>							

	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 L<sub>dn</sub>.<sup>50</sup> 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 L<sub>dn</sub> 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 L<sub>dn</sub>.

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<sup>50</sup> City and County of San Francisco, *Areas Potentially Requiring Noise Insulations*, March 2009, [http://default.sfplanning.org/publications\\_reports/library\\_of\\_cartography/Noise.pdf](http://default.sfplanning.org/publications_reports/library_of_cartography/Noise.pdf), accessed June 23, 2017.



## **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.<sup>51</sup> 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

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<sup>51</sup> City and County of San Francisco, *Article 29 of the San Francisco Police Code, Regulation of Noise*, 2012, [http://library.amlegal.com/nxt/gateway.dll/California/police/article29regulationofnoise?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:sanfrancisco\\_ca](http://library.amlegal.com/nxt/gateway.dll/California/police/article29regulationofnoise?f=templates$fn=default.htm$3.0$vid=amlegal:sanfrancisco_ca), accessed June 23, 2017.

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  $L_{dn}$  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**

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

<sup>a</sup>  $L_{eq}$  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.

<sup>b</sup> Daytime hours occur from 7 a.m. to 10 p.m.

<sup>c</sup> Nighttime hours occur from 10 p.m. to 7 a.m.

dBA = decibel (A-weighted)

Source: LSA Associates, Inc., 2017.

**Table 5: Meteorological Conditions During Ambient Noise Monitoring**

Date	Maximum Wind Speed (mph)	Average Wind Speed (mph)	Temperature (°F)	Relative Humidity (percent)	Sky Conditions
May 16, 2017	20	12	60	74	Overcast
May 17, 2017	20	10	62	66	Clear

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,  $L_{max}$**

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

Source: Bolt, Beranek & Newman, 1987. *Noise Control for Buildings and Manufacturing Plants*.

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  $L_{max}$  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  $L_{max}$  at 100 feet (equivalent to 86 dBA  $L_{max}$  at 50 feet), which would be a significant noise impact.

Implementation of **Mitigation Measure M-NO-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  $L_{max}$  at 100 feet limit, thereby reducing potential construction-period noise impacts for the indicated sensitive receptors to less-than-significant levels.

**Mitigation Measure M-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.
- 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.<sup>52</sup> Temporary plywood noise barriers can provide 5 dBA of sound attenuation. Moveable sound barrier curtains can provide 15 dBA of sound attenuation.<sup>53</sup> Static sound barrier curtains can provide sound transmission reduction of 16 to 43 dBA, depending on the frequency of the noise source.<sup>54</sup> 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.

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<sup>52</sup> Bolt, Baranek, and Newman, *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances*, December 31, 1971.

<sup>53</sup> Industrial Noise Control, *Product Specification Sheet, INC Portable Noise Screen*.

<sup>54</sup> Environmental Noise Control, *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,<sup>55</sup> 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 ( $L_{dn}$ ) 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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<sup>55</sup> 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  $L_{dn}$ . The city's land use compatibility chart shows that "satisfactory" sound levels for residential land uses are 60 dBA  $L_{dn}$  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  $L_{dn}$  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  $L_{dn}$  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  $L_{dn}$  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.

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

## 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 (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), 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 <sup>39</sup><sup>56</sup> or unclassified for most criteria pollutants with the exception of ozone, PM<sub>2.5</sub>, and PM<sub>10</sub>, 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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<sup>56</sup> "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.<sup>57</sup>

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 7: Criteria Air Pollutant Significance Thresholds**

Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs/day)	Average Daily Emissions (lbs/day)	Maximum Annual Emissions (tons/year)
ROG	54	54	10
NO <sub>x</sub>	54	54	10
PM <sub>10</sub>	82 (exhaust)	82	15
PM <sub>2.5</sub>	54 (exhaust)	54	10
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable	

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 (NO<sub>x</sub>). 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

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<sup>57</sup> Bay Area Air Quality Management District, *California Environmental Quality Act Air Quality Guidelines*, May 9, 2017, <http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>, accessed August 6, 2017.

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 NO<sub>x</sub>, the offset emissions level is an annual average of 10 tons per year (or 54 pounds (lbs.) per day).<sup>58</sup> 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 NO<sub>x</sub> 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 NO<sub>x</sub> emissions. Due to the temporary nature of construction activities, only the average daily thresholds are applicable to construction phase emissions.

#### **Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>)<sup>59</sup>**

The BAAQMD has not established an offset limit for PM<sub>2.5</sub>. However, the emissions limit in the federal New Source Review (NSR) for stationary sources in nonattainment areas is an appropriate significance threshold. For PM<sub>10</sub> and PM<sub>2.5</sub>, 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.<sup>60</sup> Similar to ozone precursor

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

<sup>59</sup> PM<sub>10</sub> is often termed “coarse” particulate matter and is made of particulates that are 10 microns in diameter or smaller. PM<sub>2.5</sub>, termed “fine” particulate matter, is composed of particles that are 2.5 microns or less in diameter.

<sup>60</sup> Bay Area Air Quality Management District, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, page 16, October 2009.

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<sup>61</sup> and individual measures have been shown to reduce fugitive dust by anywhere from 30 to 90 percent.<sup>62</sup> The BAAQMD has identified a number of BMPs to control fugitive dust emissions from construction activities.<sup>63</sup> 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<sub>2</sub> concentrations have never exceeded the standards. The primary source of CO emissions from development projects is vehicle traffic. Construction-related SO<sub>2</sub> 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<sub>2</sub>. Furthermore, the BAAQMD has

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<sup>61</sup> Western Regional Air Partnership, *WRAP Fugitive Dust Handbook*. September 7, 2006, [http://www.wrapair.org/forums/dejfdh3/content/FDHandbook\\_Rev\\_06.pdf](http://www.wrapair.org/forums/dejfdh3/content/FDHandbook_Rev_06.pdf), accessed August 2, 2017.

<sup>62</sup> Bay Area Air Quality Management District, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, page 27, October 2009.

<sup>63</sup> 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 SO<sub>2</sub> emissions that could result from a development projects, development projects would not result in a cumulatively considerable net increase in CO or SO<sub>2</sub>, 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.<sup>64</sup>

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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<sup>64</sup> 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<sub>2.5</sub>) are strongly associated with mortality, respiratory diseases, and lung development in children, and other endpoints such as hospitalization for cardiopulmonary disease.<sup>65</sup> In addition to PM<sub>2.5</sub>, 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.<sup>66</sup> 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.

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<sup>65</sup> San Francisco Department of Public Health, *Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review*, May 2008.

<sup>66</sup> California Air Resources Board, Fact Sheet, “The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines,” October 1998.

## 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.<sup>67</sup> 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,<sup>68</sup> the U.S. EPA states that it “...strives to provide maximum feasible protection against risks to health from hazardous air pollutants by (1) protecting the greatest number of persons possible to an individual lifetime risk level no higher than approximately one in one million and (2) limiting to no higher than approximately one in ten thousand [100 in one million] the estimated risk that a person living near a plant would have if he or she were exposed to the maximum pollutant concentrations for 70 years.” The 100-per-one-million excess cancer cases is also consistent with the ambient cancer risk in the most pristine portions of the bay area based on BAAQMD regional modeling.<sup>69</sup>

## 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<sub>2.5</sub> standard of 15 µg/m<sup>3</sup> should be revised to a level within the range of 13 to 11 µg/m<sup>3</sup>, with evidence strongly supporting a standard within the range of 12 to 11 µg/m<sup>3</sup>. The Air Pollutant Exposure Zone for San Francisco is based on the health protective PM<sub>2.5</sub> standard of 11 µg/m<sup>3</sup>, as supported by the U.S. EPA Particulate Matter Policy

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<sup>67</sup> Bay Area Air Quality Management District, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, page 67, October 2009.

<sup>68</sup> 54 Federal Register 38044, September 14, 1989.

<sup>69</sup> Bay Area Air Quality Management District, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, page 67, October 2009.

Assessment, although lowered to 10  $\mu\text{g}/\text{m}^3$  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  $\text{PM}_{2.5}$ . The air quality assessment evaluates the concentration of  $\text{PM}_{2.5}$  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  $\text{PM}_{2.5}$  at the site would be greater than 0.2 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ), Health Code section 3807 requires development on the site to be designed or relocated to avoid exposure greater than 0.2  $\mu\text{g}/\text{m}^3$ , or a ventilation system to be installed that would be capable of removing 80 percent of ambient  $\text{PM}_{2.5}$  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.<sup>70</sup>

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<sup>70</sup> City and County of San Francisco. *Air Pollutant Exposure Zone Map*. April 10, 2014, <https://www.sfdph.org/dph/files/EHSdocs/AirQuality/AirPollutantExposureZoneMap.pdf>, accessed June 23, 2017.

## 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, NO<sub>x</sub>, ROG, PM<sub>2.5</sub> and PM<sub>10</sub>, 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 PM<sub>2.5</sub> concentrations to state and federal standards of 12 µg/m<sup>3</sup> in the San Francisco Bay Area would prevent between 200 and 1,300 premature deaths.<sup>71</sup>

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<sup>71</sup> 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**

Land Use Type	Operational Criteria Pollutant Screening Size	Construction Criteria Pollutant Screening Size	Project Components
Apartment, mid-rise	494 dwelling units	240 dwelling units	108 dwelling units
Strip Mall	99,000 sf	19,000 sf	2,600 sf

Source: Bay Area Air Quality Management District, *California Environmental Quality Act Air Quality Guidelines*, May 9, 2017.

**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.<sup>72</sup> 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.<sup>73</sup> 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).<sup>74</sup> 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.<sup>75</sup>

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

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<sup>72</sup> 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.

<sup>73</sup> *Ibid.*

<sup>74</sup> California Air Resources Board, *In-Use Off-Road Equipment, 2011 Inventory Model*, [http://www.arb.ca.gov/msei/categories.htm#inuse\\_or\\_category](http://www.arb.ca.gov/msei/categories.htm#inuse_or_category), accessed April 2, 2012.

<sup>75</sup> 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, NO<sub>x</sub> and PM emissions will be reduced by more than 90 percent.<sup>76</sup>

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.<sup>77</sup>

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.

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<sup>76</sup> U.S. Environmental Protection Agency, *Clean Air Nonroad Diesel Rule: Fact Sheet*, May 2004.

<sup>77</sup> Bay Area Air Quality Management District, *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.<sup>78</sup> 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.

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<sup>78</sup> 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 break 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**

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

How to use the table: If the 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. (*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 **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. (*less-than-significant impact*)**

#### **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<sub>2.5</sub> increase greater than 0.3 µg/m<sup>3</sup>. 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<sub>2.5</sub> increase greater than 0.8 µg/m<sup>3</sup> 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<sub>2.5</sub> (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 M-AQ-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.

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<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>7. GREENHOUSE GAS EMISSIONS— Would the project:</b>					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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*,<sup>79</sup> 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,<sup>80</sup> 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).<sup>81</sup>

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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<sup>79</sup> San Francisco Planning Department, *Strategies to Address Greenhouse Gas Emissions in San Francisco*, 2010, <http://sf-planning.org/greenhouse-gas-reduction-strategies>, accessed June 23, 2017.

<sup>80</sup> ICF International, *Technical Review of the 2012 Community-wide GHG Inventory for the City and County of San Francisco*, January 21, 2015, [https://sfenvironment.org/sites/default/files/fliers/files/icf\\_verificationmemo\\_2012sfcommunityinventory\\_2015-01-21.pdf](https://sfenvironment.org/sites/default/files/fliers/files/icf_verificationmemo_2012sfcommunityinventory_2015-01-21.pdf), accessed June 23, 2017.

<sup>81</sup> Executive Order S-3-05, Assembly Bill 32, and the *Bay Area 2010 Clean Air Plan* set a target of reducing GHG emissions to below 1990 levels by year 2020.

under EO S-3-05<sup>82</sup>, EO B-30-15,<sup>83,84</sup> and Senate Bill (SB) 32,<sup>85,86</sup> 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.

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<sup>82</sup> 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 [MTCO<sub>2</sub>E]); by 2020, reduce emissions to 1990 levels (approximately 427 million MTCO<sub>2</sub>E); and by 2050 reduce emissions to 80 percent below 1990 levels (approximately 85 million MTCO<sub>2</sub>E). 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.

<sup>83</sup> Office of the Governor, *Executive Order B-30-15*, April 29, 2015, <https://www.gov.ca.gov/news.php?id=18938>, accessed June 23, 2017. Executive Order B-30-15, issued on April 29, 2015, sets forth a target of reducing GHG emissions to 40 percent below 1990 levels by 2030 (estimated at 2.9 million MTCO<sub>2</sub>E).

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

<sup>85</sup> 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.

<sup>86</sup> 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.<sup>87</sup>

The proposed project's waste-related emissions would be reduced through compliance with the city's recycling and composting ordinance, construction and demolition debris recovery ordinance, and green building code requirements. These regulations reduce the amount of materials sent to a landfill, reducing GHGs emitted by landfill operations. These regulations also promote reuse of materials, conserving their embodied energy<sup>88</sup> 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).<sup>89</sup> Thus, the proposed project was determined to be consistent with San Francisco's GHG reduction strategy.<sup>90</sup>

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

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<sup>87</sup> Compliance with water conservation measures reduce the energy (and GHG emissions) required to convey, pump and treat water required for the project.

<sup>88</sup> Embodied energy is the total energy required for the extraction, processing, manufacture and delivery of building materials to the building site.

<sup>89</sup> While not a GHG, VOCs are precursor pollutants that form ground level ozone. Increased ground level ozone is an anticipated effect of future global warming that would result in added health effects locally. Reducing VOC emissions would reduce the anticipated local effects of global warming.

<sup>90</sup> 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.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>8. WIND AND SHADOW— Would the project:</b>					
a) Alter wind in a manner that substantially affects public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

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.<sup>91</sup>

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<sup>91</sup> 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.<sup>92</sup> 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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<sup>92</sup> PreVision Design, Shadow Analysis Report for the Proposed 500 Turk Street Per SF Planning Section 295 Standards. January 31, 2017.

**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.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>9. RECREATION— Would the project:</b>					
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Physically degrade existing recreational resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**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.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>10. UTILITIES AND SERVICE SYSTEMS— Would the project:</b>					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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 existing 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.<sup>93</sup>

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.<sup>94</sup> The proposed project would also be designed to incorporate water-conserving measures, such as low-flush toilets

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<sup>93</sup> San Francisco Public Utilities Commission, San Francisco Stormwater Management Requirements and Design Guidelines, May 2016, <http://www.sfwater.org/Modules/ShowDocument.aspx?documentID=9026>, accessed August 7, 2017.

<sup>94</sup> San Francisco Public Utilities Commission, *2010 Urban Water Management Plan*, June 2011. This document is available for review at: <http://www.sfwater.org/Modules/ShowDocument.aspx?documentID=1055>, accessed June 23, 2017.



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,<sup>95</sup> 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.<sup>96</sup> 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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<sup>95</sup> San Francisco Public Utilities Commission, 2015 Urban Water Management Plan for the City and County of San Francisco, June 14, 2016.

<sup>96</sup> San Francisco Planning Department, *Agreement for Disposal of San Francisco Municipal Solid Waste at Recology Hay Road Landfill in Solano County Final Negative Declaration*, Planning Department Case No. 2014.0653, May 21, 2015. Available online at: [http://sfmea.sfplanning.org/2014.0653E\\_Revised\\_FND.pdf](http://sfmea.sfplanning.org/2014.0653E_Revised_FND.pdf), accessed June 23, 2017.

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.<sup>97</sup> 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),<sup>98</sup> 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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<sup>97</sup> CalRecycle, Jurisdiction Diversion/Disposal Rate Detail, <http://www.calrecycle.ca.gov/LGCentral/reports/diversionprogram/JurisdictionDiversionDetail.aspx?JurisdictionID=438&Year=2010>, accessed June 23, 2017.

<sup>98</sup> San Francisco Department of the Environment, Zero Waste Program, “San Francisco Sets North American Record for Recycling and Composting with 80 Percent Diversion Rate.” Available online at: <https://sfenvironment.org/news/press-release/mayor-lee-announces-san-francisco-reaches-80-percent-landfill-waste-diversion-leads-all-cities-in-north-america>, accessed June 23, 2017.

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.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
<b>11. PUBLIC SERVICES— Would the project:</b>					
a) Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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.

<b>Topics:</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>	<b>Not Applicable</b>
<b>12. BIOLOGICAL RESOURCES— Would the project:</b>					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>12. BIOLOGICAL RESOURCES— Would the project:</b>					
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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, or 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.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
<b>13. GEOLOGY AND SOILS—</b>					
<b>Would the project:</b>					
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.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Change substantially the topography or any unique geologic or physical features of the site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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.<sup>99</sup> The project site is underlain by loose sandy fill material, medium-dense to very

<sup>99</sup> Langan Engineering and Environmental Services, Inc. *Geotechnical Investigation 500 Turk Street San Francisco, California*. December 21, 2016.

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.<sup>100</sup> 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.<sup>101</sup> 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.”<sup>102</sup> 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

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<sup>100</sup> U.S. Geological Survey and California Geological Survey, Quaternary Fault and Fold Database for the United States, 2010, <https://earthquake.usgs.gov/hazards/qfaults/>, accessed June 23, 2017.

<sup>101</sup> California Division of Mines and Geology, State of California Seismic Hazard Zones, City and County of San Francisco Official Map, November 17, 2000, [http://gmw.consrv.ca.gov/shmp/download/pdf/ozn\\_sf.pdf](http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_sf.pdf), accessed June 23, 2017.

<sup>102</sup> Association of Bay Area Governments, Earthquake Shaking Hazard Map, San Francisco Scenario, North Golden Gate Segment of the San Andreas Fault System, 2003, <http://resilience.abag.ca.gov/earthquakes/>, accessed June 23, 2017.

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,<sup>103</sup> 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<sup>104</sup> 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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<sup>103</sup> 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.

<sup>104</sup> 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.<sup>105</sup> 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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<sup>105</sup> Transbay Transit Center, Archaeology, 2014, <http://transbaycenter.org/project/archaeology>, accessed August 7, 2017.

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.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>14. HYDROLOGY AND WATER QUALITY— Would the project:</b>					
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion of siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>Topics:</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>	<b>Not Applicable</b>
<b>14. HYDROLOGY AND WATER QUALITY— Would the project:</b>					
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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).<sup>106</sup> 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.<sup>107</sup> Therefore, topics 14.g, 14.h, and 14.i are also not applicable.

<sup>106</sup> San Francisco, City and County of, *San Francisco General Plan, Community Safety Element*, October 2012, [http://generalplan.sfplanning.org/Community\\_Safety\\_Element\\_2012.pdf](http://generalplan.sfplanning.org/Community_Safety_Element_2012.pdf), accessed June 23, 2017.

<sup>107</sup> Federal Emergency Management Agency, *Preliminary Flood Insurance Rate Map*, 2016, [http://sfgsa.org/sites/default/files/Document/SF\\_NE.pdf](http://sfgsa.org/sites/default/files/Document/SF_NE.pdf), accessed June 23, 2017.

**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.

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<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>15. HAZARDS AND HAZARDOUS MATERIALS— Would the project:</b>					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>15. HAZARDS AND HAZARDOUS MATERIALS— Would the project:</b>					
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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,<sup>108</sup> the *phase I environmental site assessment* (site assessment)<sup>109</sup> 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.

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<sup>108</sup> San Francisco Planning Department, Expanded Maher Map Area, March 2015, [http://www.sf-planning.org/ftp/files/publications\\_reports/library\\_of\\_cartography/Maher%20Map.pdf](http://www.sf-planning.org/ftp/files/publications_reports/library_of_cartography/Maher%20Map.pdf), accessed June 23, 2017. The 500 Turk Street parcel will be added to the next iteration of the map.

<sup>109</sup> 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*<sup>110</sup> 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/m<sup>3</sup> to 290 µg/m<sup>3</sup>. PCE concentrations were detected at levels above the residential environmental screening levels (ESLs) of 100 µg/m<sup>3</sup> at 290 µg/m<sup>3</sup>. 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

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<sup>110</sup> Langan Treadwell Rollo, November 28, 2016. *Phase II Environmental Site Assessment, 500 Turk Street, San Francisco, CA 94102.*

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,<sup>111</sup> 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*)**

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<sup>111</sup> Turk 500 Associated, L.P., Maher Ordinance Application for the 500 Turk Project, January 5, 2017.

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).<sup>112</sup> 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.

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<sup>112</sup> 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.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>16. MINERAL AND ENERGY RESOURCES— Would the project:</b>					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<p><b>17. AGRICULTURE AND FOREST RESOURCES</b> 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.</p> <p><b>—Would the project:</b></p>					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) or timberland (as defined by Public Resources Code section 4526)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
<b>18. MANDATORY FINDINGS OF SIGNIFICANCE— Would the project:</b>					
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have impacts that would be individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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.

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## 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.<sup>113</sup>

### 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

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<sup>113</sup> 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<sup>114</sup> associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group, an appropriate representative<sup>115</sup> 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.

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<sup>114</sup> The term “archeological site” is intended here to minimally include any archeological deposit feature, burial, or evidence of burial.

<sup>115</sup> 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**

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

How to use the table: If the 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](http://www.511.org), participating in emergency ride home program through the City of San Francisco ([www.sferh.org](http://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.



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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

**PLACE  
POSTAGE  
HERE**

San Francisco Planning Department  
Environmental Planning Division  
1650 Mission Street, Suite 400  
San Francisco, California 94103

Attn: Jeanie Poling, Environmental Planner  
Case No. 2016.-010340ENV  
500 Turk Street Project

PLEASE CUT ALONG DOTTED LINE

RETURN REQUEST REQUIRED FOR FINAL  
ENVIRONMENTAL IMPACT REPORT

REQUEST FOR FINAL ENVIRONMENTAL IMPACT REPORT

TO: San Francisco Planning Department, Environmental Planning Division

- Check one box:  Please send me a copy of the Final EIR on CD  
 Please send me a paper copy of the Final EIR

Signed: \_\_\_\_\_

Print Your Name and Address in the Box Below: