



# SAN FRANCISCO PLANNING DEPARTMENT

**MEMO**

DATE: April 5, 2018  
TO: Planning Commission  
FROM: Elizabeth White and Jessica Range, Environmental Planning  
RE: Errata to the Environmental Impact Report for the  
Central South of Market (SoMa) Area Plan  
Planning Department Case No. 2011.1356E

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Following publication of the Responses to Comments document (RTC) for the Central South of Market Area (SoMa) Plan Draft Environmental Impact Report (Draft EIR), the Planning Department determined it was necessary to: (1) further clarify Mitigation Measure M-CP-1a in the Draft EIR, (2) correct an error in the Draft EIR, and (3) provide an analysis of whether the EIR evaluates the environmental effects of additional Plan changes proposed by legislative sponsors between February 15, 2018 and April 5, 2018, as presented in the Planning Commission packet for consideration on April 12, 2018. This errata addresses each of these three items.

The Environmental Planning Division of the Planning Department has determined that these clarifications, corrections, and analysis of Plan changes do not change any of the conclusions in the EIR and do not constitute significant new information that requires recirculation of the EIR under the California Environmental Quality Act (CEQA) (California Public Resources Code Section 21092.1) and the CEQA Guidelines (14 California Code of Regulations Section 15088.5).

These additional staff-initiated text changes will be incorporated into the Final EIR. New revisions are noted in **red**, with deletions marked with ~~strikethrough~~ and additions noted with double underline.

## 1. Clarification of Mitigation Measure M-CP-1a:

The following revisions are made to Table S-1, Summary of Impacts of the Plan-Identified in the EIR [Revisions Only], on RTC page 402.

TABLE S-1 SUMMARY OF IMPACTS OF THE PLAN – IDENTIFIED IN THE EIR [REVISIONS ONLY]

Impact	Level of Significance Before Mitigation	Mitigation and Improvement Measures	Level of Significance After Mitigation
C. Cultural and Paleontological Resources			
<p><b>Impact CP-1:</b> Development under the Plan would result in the demolition or substantial alteration of individually identified historic architectural resources and/or contributors to a historic district or conservation district located in the Plan Area, including as-yet unidentified resources, a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.</p>	S	<p><b>* Mitigation Measure M-CP-1a: Mandatory Consultation Regarding Avoidance or Minimization of Effects on Identified Historical Resources.</b> The project sponsor of a subsequent development project in the Plan Area shall consult with the Planning Department’s <del>Preservation staff</del> <u>at the time of submittal of an environmental evaluation application</u> to determine whether there are feasible means to <del>re-design or otherwise revise the project to avoid a substantial significant adverse change in the significance of an effects on</del> <u>historic architectural resource(s) (including historic districts), whether previously identified or identified as part of the project’s historical resources analysis. Pursuant to CEQA Guidelines Section 15064.5(b), “[s]ubstantial adverse change in the significance of a historical resource means 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.”</u> If avoidance is not feasible, the project sponsor shall <u>consult with Planning Department staff to determine whether there are feasible means to</u> <del>seek feasible means to reduce effects on historic architectural resource(s) to the maximum extent feasible, a less than significant level.</del> <u>Avoidance and minimization measures shall seek to retain the resource’s character-defining features, and may include, but are not limited to: retention of character-defining features, building setbacks, salvage, or adaptive reuse. In evaluating the feasibility of avoidance or reduction of effects, the Planning Department shall consider whether avoidance or reduction can be accomplished successfully within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors, along with the Central SoMa Plan policies and project objectives. The applicability of each factor would vary from project to project, and would be determined by staff on a case-by-case basis, with the significance of the impact to be judged based on whether the proposed project would materially impair the resource as defined in CEQA Guidelines Section 15064.5(b).</u></p> <p><u>Should Planning Department staff determine through the consultation process that avoidance or reduction of effects on historic architectural resources is Mitigation Measure M-CP-1a be determined to be infeasible, Measures M-CP-1b, M-CP-1c, M-CP-1d, and/or M-CP-1e, shall be applicable, based on the specific circumstances of the project in question. CEQA Guidelines Section 15364 defines “feasible” as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” The applicability of each factor would vary from project to project, and would be determined by staff on a case by case basis.</u></p> <p>...</p>	SUM

The following revisions are made to RTC page 455:

On Draft EIR p. IV.C-58, Mitigation Measure M-CP-1a has been revised as follows to clarify guidance with regard to avoiding or minimizing effects on historical impacts:

**Mitigation Measure M-CP-1a: Mandatory Consultation Regarding Avoidance or Minimization of Effects on Identified Historical Resources.** The project sponsor of a subsequent development project in the Plan Area shall consult with the Planning Department's ~~Preservation staff at the time of submittal of an environmental evaluation application to~~ determine whether there are feasible means to ~~redesign or otherwise revise the project to avoid a~~ substantial significant adverse change in the significance of an effects on historic architectural resource(s) (including historic districts), whether previously identified or identified as part of the project's historical resources analysis. Pursuant to CEQA Guidelines Section 15064.5(b), "[s]ubstantial adverse change in the significance of a historical resource means 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." If avoidance is not feasible, the project sponsor shall consult with Planning Department staff to determine whether there are feasible means to ~~seek feasible means to~~ reduce effects on historic architectural resource(s) ~~to the maximum extent feasible, a less than significant level.~~ Avoidance and minimization measures shall seek to retain the resource's character-defining features, and may include, but are not limited to: retention of character-defining features, building setbacks, salvage, or adaptive reuse. In evaluating the feasibility of avoidance or reduction of effects, the Planning Department shall consider whether avoidance or reduction can be accomplished successfully within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors, along with the Central SoMa Plan policies and project objectives. The applicability of each factor would vary from project to project, and would be determined by staff on a case-by-case basis. ~~with the significance of the impact to be judged based on whether the proposed project would materially impair the resource as defined in CEQA Guidelines Section 15064.5(b).~~

Should Planning Department staff determine through the consultation process that avoidance or reduction of effects on historic architectural resources is Mitigation Measure M-CP-1a be determined to be infeasible, Measures M-CP-1b, M-CP-1c, M-CP-1d, and/or M-CP-1e, shall be applicable, based on the specific circumstances of the project in question. CEQA Guidelines Section 15364 defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." The applicability of each factor would vary from project to project, and would be determined by staff on a case by case basis.

## 2. Corrections to the Draft EIR

The following revisions are made to the last two sentences on Draft EIR page VI-4:

Development under the The No Project Alternative assumes that growth in the Plan Area and the city would occur with or without implementation of the Plan, but that absent implementation of the Plan, a smaller percentage of citywide growth would occur in the Plan Area. The No Project Alternative Plan would result in additional traffic that would increase traffic noise levels throughout the Plan Area vicinity. As shown in Table IV.E-9, Cumulative Plus Plan Traffic Noise Analysis, under 2040 cumulative no project conditions traffic noise levels would increase by 3 dBA or more along Fourth Street between Brannan and Townsend

Streets, which would be a significant and unavoidable impact and would conflict with *General Plan* policy regarding traffic noise (Impact LU-2).

### 3. Analysis of Plan Changes that Occurred After February 15, 2018

The attached memorandum evaluates the environmental effects of Plan changes proposed by legislative sponsors between February 18, 2018 and April 5, 2018, as presented in the Planning Commission packet for consideration on April 12, 2018. This analysis finds that the EIR adequately addresses the Central SoMa Plan, with these proposed modifications. This document is being included in the EIR as a new Appendix G. Therefore, the following revision is made to the Draft EIR's Table of Contents' list of appendices on Draft EIR page vi:

[Appendix G Analysis of Environmental Effects of Plan Changes for the Central South of Market Area \(SoMa\) Plan](#)

Enclosures:

Appendix G Analysis of Environmental Effects of Plan Changes Presented April 5, 2018 for the Central South of Market Area (SoMa) Plan



**SAN FRANCISCO  
PLANNING DEPARTMENT**

**MEMO**

**DATE:** April 5, 2018  
**TO:** Planning Commission  
**FROM:** Elizabeth White and Jessica Range, Environmental Planning  
Steve Wertheim, Citywide Planning  
**RE:** Analysis of Environmental Effects of Plan Changes  
Presented April 5, 2018 for the Central South of Market  
Area (SoMa) Plan  
Planning Department Case No. 2011.1356E

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Following publication of the Responses to Comments document (RTC) for the Central South of Market Area (SoMa) Plan Draft Environmental Impact Report (Draft EIR), the legislative sponsors and the Planning Department propose to modify various aspects of the Plan based upon feedback from the community and decision-makers. The Environmental Planning division has reviewed these changes, which are detailed in the Planning Commission packet for April 5, 2018 and determined that the environmental analysis conducted for the EIR adequately analyzes the Central SoMa Plan, with these modifications.

This memoranda explains how proposed strategies designed to maximize the number of housing units anticipated under the Plan would not result in increased physical environmental effects beyond that already studied in the EIR, and therefore would not change any of the conclusions in the EIR and do not constitute significant new information that requires recirculation of the EIR under the California Environmental Quality Act (CEQA) (California Public Resources Code Section 21092.1) and the CEQA Guidelines (14 California Code of Regulations Section 15088.5).

**Proposal to Maximize Housing under the Central SoMa Plan**

The Planning Department has developed a two-pronged proposal to maximize the number of housing units anticipated under the Plan. These proposals include a modification to the Planning Code and Zoning Map as discussed below.

Planning Code Amendments

The Planning Department proposes to modify Planning Code Section 249.78(c)(6)(A) to increase the size of sites previously designated to be commercially-oriented from 30,000 square feet to 40,000 square feet.

This change to the Planning Code would require two sites in the Plan Area previously anticipated to be commercial to become residential, which would result in a net increase of 640 units above that anticipated by the Plan and a net decrease of approximately 2,050 jobs.<sup>1</sup> This change would also result in a commensurate reduction in the total number of projected jobs, discussed further below.

### Zoning Map Amendments

The Planning Department proposes to change the zoning map from the currently proposed West SoMa Mixed Use Office (WMUO)<sup>2</sup> to Central SoMa Mixed Use Office (CMUO) on the following parcels: Block 3777, Lots 047-049 and Block 3778, Lots 001, 001C, 001D, 001E, 001F, 016-019, 022-023, 025-026, 032, 046A, 046B, 046C, 046D, 046E, 046F, 046G, 046H, and 051-087. The existing zoning on these parcels is West SoMa Service, Arts, Light Industrial (WS-SALI). Both WS-SALI and WMUO generally do not allow residential uses. The proposed change to CMUO would allow residential uses on these sites, thus shifting the Plan's projected amount of jobs and housing units. The EIR assumed soft sites on these parcels would result in new office jobs. If the soft sites were developed as residential uses, this zoning change could generate about 600 additional housing units, with a commensurate reduction in the projected number of 2,700 jobs.<sup>3</sup>

### **Effect of Changes on Housing Units and Jobs Projected Under the Central SoMa Plan**

The above proposed modifications to the Central SoMa Plan would result in a shift from projected office uses to residential uses. Altogether, these Planning Code and Zoning Map amendments would result in a net increase of 1,240 residential units and a commensurate reduction of 4,750 jobs.

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<sup>1</sup> Calculation based on the Planning Department's *Buildout Analysis for Central SoMa*, January 25, 2018. This document and all other documents referenced in this memoranda are on file and available for public review as part of Case File No. 2011.1356E at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, 94103. This document includes a parcel-level analysis of development potential in the Plan Area that was utilized for the EIR and conveys that the two sites affected by this proposed change (490 Brannan Street and 330 Townsend Street) had a development potential under the previously proposed requirements of approximately 184,000 gross square feet of residential development, resulting in approximately 150 units and approximately 450,000 of non-residential uses, resulting in space for approximately 2,050 jobs, based on the EIR's assumption of 1,200 gross square feet per unit and 219 gross square feet per new job (including 200 square feet per office worker and higher for other types of jobs)(calculations of density contained in the Planning Department's *Central SoMa EIR Inputs by TAZ*, November 13, 2017). Subsequent analysis determined that, based on the revised proposal, these two sites could contain approximately 972,000 square feet of residential development if these sites are developed as fully residential, resulting in approximately 790 units.

<sup>2</sup> Note that the Plan uses the term "WMUO" and the EIR uses the term "WS-MUO." Both refer to the WSoMa Mixed-Use Office District contained in Section 845 of the Planning Code.

<sup>3</sup> Calculation based on the Planning Department's *Buildout Analysis for Central SoMa*, (January 25, 2018), which includes a parcel-level analysis of development potential in the Plan Area. This document conveys that the 62 lots affected by this proposed change had a development potential under the previously proposed requirements of approximately 800,000 square feet of non-residential space, resulting in space for approximately 3,650 jobs )(calculations of density contained in the Planning Department's *Central SoMa EIR Inputs by TAZ*, November 13, 2017). Subsequent analysis determined that, based on the revised proposal, these lots could contain approximately 720,000 square feet of residential development and 200,000 square feet of non-residential development, presuming these small sites are predominantly residential but include some small office and other non-residential uses. Such development would result in space for approximately 600 new units and 950 jobs.

## Central SoMa Plan EIR Analysis

As explained in the EIR, the analysis of physical impacts related to the proposed Planning Code and Zoning Map amendments are based, in part, on growth projections developed by the Planning Department. These growth projections inform the quantitative analysis of effects of the Plan on the physical environment.

As shown in **Table IV-1, Summary of Growth Projections** on Draft EIR page IV-6, the EIR analyzes an increase of approximately 14,500 residential units within the EIR study area, of which 8,320 units are anticipated to occur within the Plan Area. The Plan, on the other hand, projects a total of 7,060 residential units.<sup>4</sup> With the additional 1,240 residential units projected under the Plan, the total projected number of residential units would be 8,300 units, which is below the 8,320 units analyzed in the EIR. Additionally, there would be a commensurate reduction in the number of jobs projected in the Plan area of about 4,750 jobs. As shown in **Table IV-1, Summary of Growth Projections** on Draft EIR page IV-6, the EIR analyzes an increase of approximately 63,600 jobs within the EIR study area, of which 44,000 are anticipated to occur within the Plan Area.<sup>5</sup> The Plan, on the other hand, projects a total of 39,000 jobs.<sup>6</sup> As a result of this change, the number of new jobs anticipated under the Plan would be reduced to approximately 34,250 jobs.

## Conclusion

The Central SoMa Plan EIR conservatively analyzed higher growth projections than could occur from the proposed Plan's Planning Code and Zoning Map amendments. The modification to the Central SoMa plan would result in a shift in anticipated jobs and housing, but would not exceed the total number of residential units analyzed in the EIR. Thus, these changes to the Plan would not result in increased physical environmental effects beyond that already studied in the EIR, and therefore would not change any of the conclusions in the EIR and do not constitute significant new information that requires recirculation of the EIR under CEQA and the CEQA Guidelines. Other changes to the Plan are proposed and detailed in the Planning Commission packet for April 5, 2018 and those changes have also been evaluated and determined to not result in physical environmental effects beyond that already analyzed in the EIR.

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<sup>4</sup> Steve Wertheim, *Memorandum Regarding Central SoMa Plan-Clarification of Housing Numbers*. December 7, 2017.

<sup>5</sup> Calculation based on the Planning Department's *Central SoMa EIR Inputs by TAZ* (November 13, 2017).

<sup>6</sup> Calculation based on the Planning Department's *Buildout Analysis for Central SoMa*, (January 25, 2018), which includes a parcel-level analysis of development potential in the Plan Area.