



# SAN FRANCISCO PLANNING DEPARTMENT

**MEMO**

DATE: May 9, 2018

TO: Planning Commission

FROM: Jessica Range and Elizabeth White, 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 (RTC) document for the Central South of Market Area (SoMa) Plan Draft Environmental Impact Report (Draft EIR), the Planning Department determined it was necessary to:

- (1) update the Central SoMa Plan Final EIR certification date;
- (2) provide an analysis of changes to the Central SoMa Plan’s proposed height and zoning maps for Block 3763, Lots 112 and 113 that was included in substitute legislation introduced on April 10, 2018 by Mayor Farrell and Supervisor Kim;
- (3) clarify the application of Central SoMa Plan EIR mitigation measures to subsequent development projects;
- (4) amend mitigation measures;
- (5) include a list of required approvals for the Housing Sustainability District Ordinance; and
- (6) evaluate a list of recommended and other potential changes to the Central SoMa Plan included in the May 3, 2018 Planning Commission packet to determine whether the EIR adequately analyzes these potential changes in the event decision makers choose to include these changes in the Central SoMa Plan.

This erratum addresses each of these items. Staff-initiated EIR text changes will be incorporated into the Final EIR. New revisions are noted in **red** with additions noted with double underline and deletions noted in ~~strikethrough~~.

## 1. Central SoMa Plan Final EIR Certification Date

On April 12, 2018, the Planning Commission continued certification of the Final EIR to May 10, 2018. As such, the following revision is made to the exterior and interior RTC cover pages and page RTC-i:

Final EIR Certification Date: ~~April 12, 2018~~ May 10, 2018

Additionally, the following revisions are made to the distribution memoranda accompanying the RTC:

**This document, along with the Draft EIR, will be before the Planning Commission for Final EIR certification on ~~April 12, 2018~~ May 10, 2018.** The Planning Commission will receive public testimony on the Final EIR certification at the ~~April 12, 2018~~ May 10, 2018, hearing.

These revisions to the Final EIR's certification date 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).

## 2. Update Central SoMa Plan analysis for Block 3763, Lots 112 and 113

On April 10, 2018 Mayor Farrell and Supervisor Kim introduced substitute legislation implementing the Central SoMa Plan. The Environmental Planning Division of the Planning Department reviewed the substitute legislation and determined that the proposed changes to the zoning and height map for Block 3763 and Lots 112 and 113 require additional analysis to determine whether the proposed changes would result in new significant impacts or impacts of greater severity that were not disclosed in the Draft EIR. The substitute legislation would extend the proposed Central SoMa Mixed Use-Office (CMUO) Use District onto an approximately 7,400-square-foot, irregularly shaped area at the north-easternmost portion of Block 3763, Lot 112. The proposal would also extend a 350-CS Height and Bulk District to encompass the southern portion of this same 7,400-square-foot area (Block 3763, Lot 112), as well as the southern portion of Block 3763, Lot 113, which is an approximately 5,400-square-foot, irregularly shaped parcel, immediately north of Lot 112. EIR Appendix H, attached to this erratum, analyzes these proposed changes and finds that the proposed revisions to the Central SoMa Plan's Use District and Height and Bulk District Maps on Block 3763, Lots 112 and 113, would not result in any new or substantially more-severe significant impacts with respect to aesthetics, wind, or shadow, or any other CEQA topic, than those that were identified in the Draft EIR. However, in light of these proposed changes, the following revisions to the EIR are necessary:

Figure II-3 [Revised] in the RTC has been revised following publication of the RTC to show the zoning now proposed on a portion of Block 3763, Lot 113.

Figure II-7 [Revised] in the RTC has been revised following publication of the RTC to show the heights now proposed on Block 3763, Lot 112 and a portion of Lot 113.

Figure IV.B-19, Mid-Range Visual Simulation: Interstate 80 Westbound: Existing Conditions Plus Plan has been revised following publication of the RTC to show the heights now proposed on Block 3763, Lot 112 and a portion of Lot 113.

Figure IV.H-6 and the December 10 a.m. image in EIR Appendix E have been revised to depict the changes in shadow analysis resulting from the proposed revisions to the Central SoMa Height Map.

These revised figures are presented on the following pages.

[www.sfplanning.org](http://www.sfplanning.org)



SOURCE: San Francisco Planning Department Case No. 2011.1356E: Central SoMa Plan **Figure II-3**  
Proposed Plan Area Use Districts [Revised]



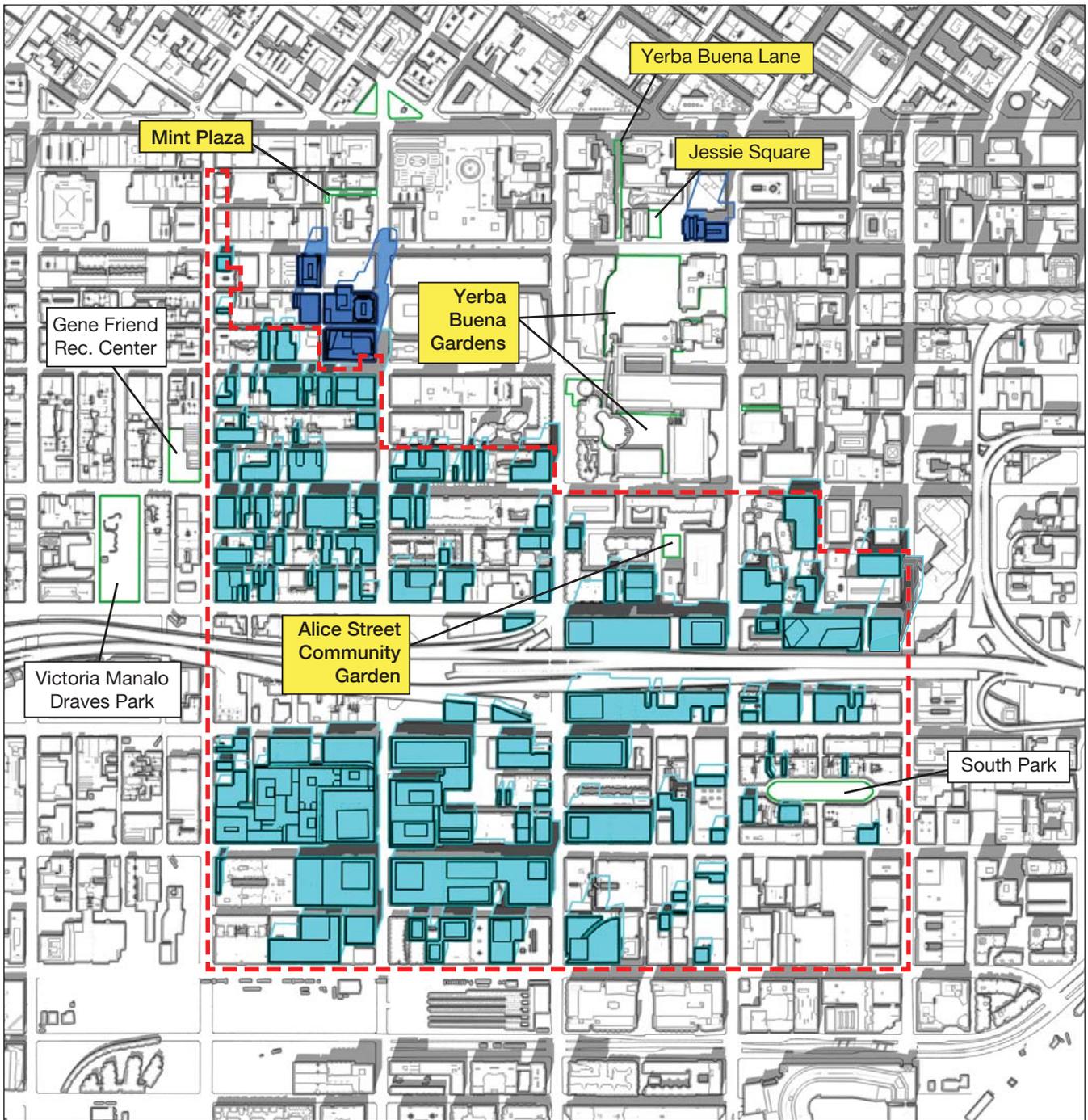
SOURCE: San Francisco Planning Department

Case No. 2011.1356E: Central SoMa Plan

**Figure II-7**  
Proposed Plan Area Height and Bulk Districts [Revised]



Plan Building



--- Plan Area Boundary



OPEN SPACES

- Section 295 Park
- Other Open Space

- Potential New Buildings and their Shadows
- Potential New Buildings' Net New Shadows at Ground Level
- Existing Shadows at Ground Level

- Approved New Buildings (5M and 706 Mission) and their Shadows
- Approved New Buildings' (5M & 706 Mission) Net New Shadows at Ground Level

SOURCE: CADP

Case No. 2011.1356E: Central SoMa Plan

**Figure IV.H-6**  
Shadows: September 20 (Fall Equinox) 12:00 noon [Revised]



Central SoMa Plan  
 December 20 10:00 am

- Proposed New Buildings
- Proposed New Buildings Net New Shadows
- Existing Shadows
- Proposed New Buildings 5M & 706 Mission
- Proposed New Buildings 5M & 706 Mission Net New Shadows



In addition, the following text changes are made to the first paragraph of the wind analysis on page IV.G-13 in the Draft EIR:

Two other new exceedances would occur at the intersection of Fourth and Townsend Streets (#47 and 48), near the southwestern corner of a potential 400-foot-tall building, and five new exceedances would occur near, and south of, the intersection of Second and Harrison Streets (#4, 5, 7, 8, and 14), in proximity to a site at 400 Second Streets that would have height limits permitting ~~three towers at heights of up to 200 feet, 350 feet, and 350 feet.~~

The following text changes are made to the first full paragraph of Draft EIR p. IV.H-38 to reflect the potential change in net new shadow from the proposed height map revision.

New shadow from Plan Area development could cast a small amount of new shadow on the western edge of the POPOS in front of 303 Second Street, across Second Street from the Plan Area, in the mid-afternoon on the solstice. At 10:00 a.m. on the winter solstice in December, new shadow from Plan Area development would be cast eastward onto the 303 Second Street POPOS. On the equinoxes, new shading would begin around noon, and would continue through much of the afternoon, reaching a peak around 2:00 p.m., when about one quarter to one third of the POPOS could be shaded. On the winter solstice, new shading could increase, beginning around 10 a.m. and continuing through most of the afternoon. At its peak, new shading could cover most of the plaza, especially between about noon and 2:00 p.m. By 3:00 p.m. on the winter solstice, most of the plaza is currently shaded. The actual amount of shading would depend on the height and massing of the building projecting its shadow toward this POPOS.

As explained above, Appendix H, attached to this erratum, evaluates the environmental effects of the substitute Central SoMa Plan legislation introduced on April 10, 2018. This document is being included in the EIR as a new Appendix H. Therefore, the following revision is made to the Draft EIR's Table of Contents' list of appendices on Draft EIR page vi:

Appendix H. Central SoMa Plan Draft EIR Revisions Arising from Zoning Changes at Second and Harrison Streets

These revisions to the Draft EIR does not constitute significant new information that requires recirculation of the EIR under CEQA (California Public Resources Code Section 21092.1) and the CEQA Guidelines (14 California Code of Regulations Section 15088.5)

### **3. Clarification of the Application of EIR Mitigation Measures to Subsequent Development Projects**

Subsequent development projects may be required to undergo additional environmental review in accordance with *California Public Resources Code* Section 21083.3 and CEQA Guidelines Section 15183 or *California Public Resources Code* Section 21094.5 and CEQA Guidelines Section 15183.3. That analysis would determine whether Central SoMa EIR mitigation measures apply to a subsequent development project. During that analysis, program-level mitigation measures identified in the Central SoMa EIR may be amended to address the specific characteristics of the subsequent project's impact. To clarify this, the following revision is made to Section I.B.4 on Draft EIR page I-6:

CEQA Guidelines Section 15168(c) states that subsequent activities in the program must be examined in light of the program EIR to determine whether an additional environmental document must be prepared. Thus, this EIR assumes that subsequent development projects in the Plan Area would be subject to environmental review at such time as those projects are proposed. The analysis of subsequent projects would be based on existing conditions at the site and vicinity, at such time a project is proposed, and would take into account any updated information relevant to the environmental analysis of the subsequent project (e.g., changes to the environmental setting or updated growth forecasts, models, etc.). Furthermore, for the environmental analysis of the subsequent project, the Planning Department would identify applicable mitigation measures in this EIR and prepare a project-specific Mitigation, Monitoring, and Reporting Program (MMRP), to reflect the specific characteristics of the subsequent project.

This revision to the Draft EIR does 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).

#### **4. Amend Mitigation Measures**

To clarify the process for mandatory consultation regarding avoidance or minimization of effects on historical resources, the following amendment has been made to EIR Mitigation Measure M-CP-1a (Mitigation M-CP-1a was revised as part of the April 5, 2018 errata to the EIR for the Central SoMa Area Plan):

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
...			
<b>C. Cultural and Paleontological Resources</b>			
<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 or consolidated development application</u> to determine whether there are feasible means to <del>redesign or otherwise revise the project to avoid a substantial significant adverse change in the significance of an effects on</del> historic architectural resource(s) (including historic districts), whether previously identified or identified as part of the project's historical resources analysis. <u>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</del> reduce effects on historic architectural resource(s) <del>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.</u> <del>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).</del></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 or consolidated development application to determine whether there are feasible means to ~~redesign or otherwise revise the project to avoid a substantial significant~~ 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.

To further reduce the significant and unavoidable transit impact identified in the EIR, the following amendments are made to EIR Mitigation Measure M-TR-3a in Table S-1, Summary of Impacts of the Plan-Identified in the EIR.

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
...			
<b>D. Transportation and Circulation</b>			
<p><b>Impact TR-3:</b> Development under the Plan, including the proposed open space improvements and street network changes, would result in a substantial increase in transit demand that would not be accommodated by local transit capacity, and would cause a substantial increase in delays resulting in adverse impacts on local and regional transit routes.</p>	S	<p><b>Mitigation Measure M-TR-3a: Transit Enhancements.</b> The following are City and County <u>and sponsors of subsequent development projects</u> actions that could reduce the transit impacts associated with implementation of the Central SoMa Plan.</p> <p><i>Enhanced Transit Funding.</i> To accommodate project transit demand, the SFMTA, and other City agencies and departments as appropriate, shall seek sufficient operating and capital funding, including through the following measures:</p> <ul style="list-style-type: none"> <li>• Establish fee-based sources of revenue.</li> <li>• Establish a congestion-charge scheme for downtown San Francisco, with all or a portion of the revenue collected going to support improved local and regional transit service on routes that serve Downtown and the Central SoMa Plan Area.</li> <li>• Area Plan funding for transit enhancements.</li> </ul> <p><i>Transit Corridor Improvement Review.</i> During the design phase, the SFMTA shall review each street network project that contains portions of Muni transit routes where significant transit delay impacts have been identified (routes 8 Bayshore, 8AX Bayshore Express, 8BX Bayshore Express, 10 Townsend, 14 Mission, 14R Mission Rapid, 27 Bryant, 30 Stockton, 45 Union-Stockton, and 47 Van Ness). Through this review, SFMTA shall incorporate feasible street network design modifications that would meet the performance criteria of maintaining accessible transit service, enhancing transit service times, and offsetting transit delay. Such features could include, but shall not be limited to, transit-only lanes, transit signal priority, queue jumps, stop consolidation, limited or express service, corner or sidewalk bulbs, and transit boarding islands, as determined by the SFMTA, to enhance transit service times and offset transit delay. Any subsequent changes to the street network designs shall be subject to a similar review process.</p> <p><i>Transit Accessibility.</i> To enhance transit accessibility, the Planning Department and the SFMTA shall establish a coordinated planning process to link land use planning and development in Central SoMa to transit and other sustainable mode planning. This shall be achieved through some or all of the following measures:</p> <ul style="list-style-type: none"> <li>• Implement recommendations of the <i>Better Streets Plan</i> that are designed to make the pedestrian environment safer and more comfortable for walk trips throughout the day, especially in areas where sidewalks and other realms of the pedestrian environment are notably unattractive and intimidating for pedestrians and discourage walking as a primary means of circulation. This includes traffic calming strategies in areas with fast-moving, one-way traffic, long blocks, narrow sidewalks and tow-away lanes, as may be found in much of the Central SoMa area.</li> <li>• Implement building design features that promote primary access to buildings from transit stops and pedestrian areas, and discourage the location of primary access points to buildings through parking lots and other auto-oriented entryways.</li> </ul>	SUM

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
		<ul style="list-style-type: none"> <li>• Develop Central SoMa transportation implementation programs that manage and direct resources brought in through pricing programs and development-based fee assessments, as outlined above, to further the multimodal implementation and maintenance of these transportation improvements.</li> <li>• <u>Sponsors of development projects with off-street vehicular parking facilities with 20 or more vehicular parking spaces shall ensure that recurring vehicle queues do not substantially affect public transit operations on the public right-of-way near the off-street vehicular parking facility. A vehicle queue is defined as one or more vehicles (destined to the parking facility) blocking any portion of any public street, alley or sidewalk for a consecutive period of three minutes or longer on a daily or weekly basis.</u>   <u>If a recurring queue occurs, the owner/operator of the parking facility shall employ abatement methods as needed to abate the queue. Appropriate abatement methods will vary depending on the characteristics and causes of the recurring queue, as well as the characteristics of the parking facility, the street(s) to which the facility connects, and the associated land uses (if applicable).</u>   <u>Suggested abatement methods include but are not limited to the following: redesign of facility to improve vehicle circulation and/or onsite queue capacity; employment of parking attendants; installation of LOT FULL signs with active management by parking attendants; use of valet parking or other space-efficient parking techniques; use of off-site parking facilities or shared parking with nearby uses; use of parking occupancy sensors and signage directing drivers to available spaces; transportation demand management strategies such as those listed in the San Francisco Planning Code TDM Program.</u>   <u>If the Planning Director, or his or her designee, suspects that a recurring queue is present, the Department shall notify the property owner in writing. Upon request, the owner/operator shall hire a qualified transportation consultant to evaluate the conditions at the site for no less than seven days. The consultant shall prepare a monitoring report to be submitted to the Department for review. If the Department determines that a recurring queue does exist, the facility owner/operator shall have 90 days from the date of the written determination to abate the queue.</u> </li> </ul> <p><i>Muni Storage and Maintenance.</i> To ensure that Muni is able to service additional transit vehicles needed to serve increased demand generated by development in Central SoMa, the SFMTA shall provide maintenance and storage facilities.</p>	

Similarly, on Draft EIR p. IV.D-54, Mitigation Measure M-TR-3a has been amended as follows:

**Mitigation Measure M-TR-3a: Transit Enhancements.** The following are City and County and sponsors of subsequent development projects actions that could reduce the transit impacts associated with implementation of the Central SoMa Plan.

*Enhanced Transit Funding.* To accommodate project transit demand, the SFMTA, and other City agencies and departments as appropriate, shall seek sufficient operating and capital funding, including through the following measures:

- Establish fee-based sources of revenue.
- Establish a congestion-charge scheme for downtown San Francisco, with all or a portion of the revenue collected going to support improved local and regional transit service on routes that serve Downtown and the Central SoMa Plan Area.
- Area Plan funding for transit enhancements.

*Transit Corridor Improvement Review.* During the design phase, the SFMTA shall review each street network project that contains portions of Muni transit routes where significant transit delay impacts have been identified (routes 8 Bayshore, 8AX Bayshore Express, 8BX Bayshore Express, 10 Townsend, 14 Mission, 14R Mission Rapid, 27 Bryant, 30 Stockton, 45 Union-Stockton, and 47 Van Ness). Through this review, SFMTA shall incorporate feasible street network design modifications that would meet the performance criteria of maintaining accessible transit service, enhancing transit service times, and offsetting transit delay. Such features could include, but shall not be limited to, transit-only lanes, transit signal priority, queue jumps, stop consolidation, limited or express service, corner or sidewalk bulbs, and transit boarding islands, as determined by the SFMTA, to enhance transit service times and offset transit delay. Any subsequent changes to the street network designs shall be subject to a similar review process.

*Transit Accessibility.* To enhance transit accessibility, the Planning Department and the SFMTA shall establish a coordinated planning process to link land use planning and development in Central SoMa to transit and other sustainable mode planning. This shall be achieved through some or all of the following measures:

- Implement recommendations of the *Better Streets Plan* that are designed to make the pedestrian environment safer and more comfortable for walk trips throughout the day, especially in areas where sidewalks and other realms of the pedestrian environment are notably unattractive and intimidating for pedestrians and discourage walking as a primary means of circulation. This includes traffic calming strategies in areas with fast-moving, one-way traffic, long blocks, narrow sidewalks and tow-away lanes, as may be found in much of the Central SoMa area.
- Implement building design features that promote primary access to buildings from transit stops and pedestrian areas, and discourage the location of primary access points to buildings through parking lots and other auto-oriented entryways.

- Develop Central SoMa transportation implementation programs that manage and direct resources brought in through pricing programs and development-based fee assessments, as outlined above, to further the multimodal implementation and maintenance of these transportation improvements.
- Sponsors of development projects with off-street vehicular parking facilities with 20 or more vehicular parking spaces shall ensure that recurring vehicle queues do not substantially affect public transit operations on the public right-of-way near the off-street vehicular parking facility. A vehicle queue is defined as one or more vehicles (destined to the parking facility) blocking any portion of any public street, alley or sidewalk for a consecutive period of three minutes or longer on a daily or weekly basis.

If a recurring queue occurs, the owner/operator of the parking facility shall employ abatement methods as needed to abate the queue. Appropriate abatement methods will vary depending on the characteristics and causes of the recurring queue, as well as the characteristics of the parking facility, the street(s) to which the facility connects, and the associated land uses (if applicable).

Suggested abatement methods include but are not limited to the following: redesign of facility to improve vehicle circulation and/or onsite queue capacity; employment of parking attendants; installation of LOT FULL signs with active management by parking attendants; use of valet parking or other space-efficient parking techniques; use of off-site parking facilities or shared parking with nearby uses; use of parking occupancy sensors and signage directing drivers to available spaces; transportation demand management strategies such as those listed in the San Francisco Planning Code TDM Program.

If the Planning Director, or his or her designee, suspects that a recurring queue is present, the Department shall notify the property owner in writing. Upon request, the owner/operator shall hire a qualified transportation consultant to evaluate the conditions at the site for no less than seven days. The consultant shall prepare a monitoring report to be submitted to the Department for review. If the Department determines that a recurring queue does exist, the facility owner/operator shall have 90 days from the date of the written determination to abate the queue.

*Muni Storage and Maintenance.* To ensure that Muni is able to service additional transit vehicles needed to serve increased demand generated by development in Central SoMa, the SFMTA shall provide maintenance and storage facilities.

Additionally, to further reduce the significant and unavoidable loading impact identified in the EIR, the following amendments are made to Mitigation Measure M-TR-6b in Table S-1, Summary of Impacts of the Plan-Identified in the EIR.

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
<b>D. Transportation and Circulation</b>			
<p><b>Impact TR-6:</b> Development under the Plan, including the proposed open space improvements and street network changes, would result in an increased demand of on-street commercial and passenger loading and a reduction in on-street commercial loading supply such that the loading demand during the peak hour of loading activities would not be accommodated within on-street loading supply, would impact existing passenger loading/unloading zones, and may create hazardous conditions or significant delay that may affect transit, other vehicles, bicycles, or pedestrians.</p>	S	<p><b>Mitigation Measure M-TR-6b: Accommodation of On-Street Commercial Loading Spaces and Passenger Loading/Unloading Zones.</b></p> <p>The SFMTA shall develop a curb management strategy (strategy) for Central SoMa or within proximity of the street network changes that articulates curb use priorities for different types of streets, while safely managing loading demands. This strategy should guide the approach to any affected commercial and passenger loading/unloading zones (loading zones) during any City agency’s development of detailed plans for each segment of the proposed street network changes. Replacement of loading zones will be considered, to the extent feasible.</p> <p>The SFMTA and the Planning Department <del>shall</del> <del>should</del> develop protocols for ongoing assessment of commercial and passenger loading needs on the affected streets, and for review of new development projects along the affected street segments to identify needed changes to the street network design (e.g., when a new driveway to a development site is required), or need for additional on-street commercial and passenger loading spaces.</p> <p><u>Sponsors of development projects that provide more than 100,000 square feet of residential or commercial uses with frontages along a public right-of-way identified on the High Injury Network, with an existing or proposed bicycle facility, or a public right-of-way that includes public transit operations, shall develop a Passenger Loading Plan. The plan shall address passenger loading activities and related queueing effects associated with for-hire services (including taxis and Transportation Network Companies) and vanpool services, as applicable. Elements of this Passenger Loading Plan may include but would not be limited to the following measures:</u></p> <ul style="list-style-type: none"> <li><u>Coordination with for-hire vehicle companies to request passenger loading zones are incorporated into companies’ mobile app device to better guide passengers and drivers where to pick up or drop off.</u></li> <li><u>Designated on-site and on-street loading zones that are clearly marked with adequate signage to permit passenger loading space and allow no other vehicles to stop/park for any duration of time. For these zones, set specific time limits restricting vehicles to stop/park over a certain period of time (e.g., three minutes) and alert passengers that their driver will depart/arrive within the allotted timeframe.</u></li> <li><u>Notifications and information to visitors and employees about passenger loading activities and operations, including detailed information on vanpool services and locations of pick-up/drop-off of for-hire services.</u></li> <li><u>Detailed roles and responsibilities for managing and monitoring the passenger loading zone(s) and properly enforcing any passenger vehicles that are in violation (e.g., blocking bicycle lane, blocking a driveway, etc.).</u></li> </ul> <p><u>The plan shall be reviewed and approved by the Environmental Review Officer or designee of the Planning Department and the Sustainable Streets Director or designee of the SFMTA. The plan shall be evaluated by</u></p>	SUM

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
		<u>a qualified transportation professional, retained by the Project Sponsor after a building(s) reaches 50% occupancy and once a year going forward until such time that the SFMTA determines that the evaluation is no longer necessary or could be done at less frequent intervals. The content of the evaluation report shall be determined by SFMTA staff, in consultation with the Planning Department, and generally shall include an assessment of on-street loading conditions, including actual loading demand, loading operation observations, and an assessment of how the project meets this mitigation measure. The evaluation report may be folded into other mitigation measure reporting obligations. If ongoing conflicts are occurring based on the assessment, the evaluation report shall put forth additional measures to address ongoing conflicts associated with loading operations. The evaluation report shall be reviewed by SFMTA staff, which shall make the final determination whether ongoing conflicts are occurring. In the event that ongoing conflicts are occurring, the above plan requirements may be altered (e.g., the hour and day restrictions listed above, number of loading vehicle operations permitted during certain hours listed above).</u>	

Similarly, on Draft EIR p. IV.D-54, Mitigation Measure M-TR-6b has been amended as follows:

**Mitigation Measure M-TR-6b: Accommodation of On-Street Commercial Loading Spaces and Passenger Loading/Unloading Zones.**

The SFMTA shall develop a curb management strategy (strategy) for Central SoMa or within proximity of the street network changes that articulates curb use priorities for different types of streets, while safely managing loading demands. This strategy should guide the approach to any affected commercial and passenger loading/unloading zones (loading zones) during any City agency's development of detailed plans for each segment of the proposed street network changes. Replacement of loading zones will be considered, to the extent feasible.

The SFMTA and the Planning Department ~~shall~~ ~~should~~ develop protocols for ongoing assessment of commercial and passenger loading needs on the affected streets, and for review of new development projects along the affected street segments to identify needed changes to the street network design (e.g., when a new driveway to a development site is required), or need for additional on-street commercial and passenger loading spaces.

Sponsors of development projects that provide more than 100,000 square feet of residential or commercial uses with frontages along a public right-of-way identified on the High Injury Network, with an existing or proposed bicycle facility, or a public right-of-way that includes public transit operations, shall develop a Passenger Loading Plan. The plan shall address passenger loading activities and related queueing effects associated with for-hire services (including taxis, and Transportation Network Companies) and vanpool services, as applicable. Elements of this Passenger Loading Plan may include but would not be limited to the following measures:

- Coordination with for-hire vehicle companies to request passenger loading zones are incorporated into companies' mobile app device to better guide passengers and drivers where to pick up or drop off.
- Designated on-site and on-street loading zones that are clearly marked with adequate signage to permit passenger loading space and allow no other vehicles to stop/park for any duration of time. For these zones, set specific time limits restricting vehicles to stop/park over a certain period of time (e.g., three minutes) and alert passengers that their driver will depart/arrive within the allotted timeframe.
- Notifications and information to visitors and employees about passenger loading activities and operations, including detailed information on vanpool services and locations of pick-up/drop-off of for-hire services.
- Detailed roles and responsibilities for managing and monitoring the passenger loading zone(s) and properly enforcing any passenger vehicles that are in violation (e.g., blocking bicycle lane, blocking a driveway, etc.).

The plan shall be reviewed and approved by the Environmental Review Officer or designee of the Planning Department and the Sustainable Streets Director or designee of the SFMTA. The plan shall be evaluated by a qualified transportation professional, retained by the Project Sponsor after a building(s) reaches 50% occupancy and once a year going forward until such time that the SFMTA determines that the evaluation is no longer necessary or

could be done at less frequent intervals. The content of the evaluation report shall be determined by SFMTA staff, in consultation with the Planning Department, and generally shall include an assessment of on-street loading conditions, including actual loading demand, loading operation observations, and an assessment of how the project meets this mitigation measure. The evaluation report may be folded into other mitigation measure reporting obligations. If ongoing conflicts are occurring based on the assessment, the plan report shall put forth additional measures to address ongoing conflicts associated with loading operations. The evaluation report shall be reviewed by SFMTA staff, which shall make the final determination whether ongoing conflicts are occurring. In the event that ongoing conflicts are occurring, the above plan requirements may be altered (e.g., the hour and day restrictions listed above, number of loading vehicle operations permitted during certain hours listed above).

These amendments to the Final EIR mitigation measures do not constitute significant new information that requires recirculation of the EIR under CEQA (California Public Resources Code Section 21092.1) and the CEQA Guidelines (14 California Code of Regulations Section 15088.5).

## 5. List of Approvals Required for the Housing Sustainability District Ordinance

The following approval has been added to Section II.E Approvals Required in Draft EIR, page II-45:

### II.E Approvals Required

Approval and implementation of the final Central SoMa Plan would require the following actions. (Approving bodies are identified in italics.) Specific and detailed actions would be determined as the Plan is developed.

- Approval of the Housing Sustainability District, which would consist of the following actions:
  - *San Francisco Planning Commission: (1) Certify the EIR and (2) recommend planning code text amendments to the San Francisco Board of Supervisors*
  - *San Francisco Board of Supervisors: (1) Approve planning code text and (2) adopt an ordinance amending the planning code to designate portions, or all of the Central SoMa Plan area, as a Housing Sustainability District.*

## 6. Evaluation of Potential Changes to the Central SoMa Plan Included in the May 3, 2018

### Planning Commission Packet

The May 3, 2018 Planning Commission packet includes a list of “Changes since Introduction” (Exhibits II.6, III.5, IV.4, and V.4), recommended modifications to the Planning Code (contained in Exhibit III.1) and “Issues for Consideration” (contained in Exhibits III.6, IV.5, and V.5). The Environmental Planning Division reviewed these items and determined that, apart from the following item, the changes merely clarify or make corrections to the current proposal, or would not result in environmental effects beyond that analyzed in the EIR.

**Item not covered in the EIR analysis:** Setting the maximum development capacity at each site to the amount listed in the Key Development Sites Guidelines, rather than the formula provided.

**Rationale:** The proposed Planning Code formula (Section 263.32(c)(1)) setting development capacity for the key sites was developed to ensure that development on key sites do not exceed the growth projected under the EIR. It is unclear how setting maximum development capacity according to the

Key Development Sites Guidelines would affect the overall growth anticipated and evaluated in the EIR. More information regarding the effects of this proposal on the Plan's anticipated growth projections would be required before the Commission adopt this proposal in order to assess whether the environmental effects of the proposal are adequately addressed in the EIR. Furthermore, the Planning Department staff do not recommend the Central SoMa Plan be amended to incorporate this request.

In addition, as further explained in EIR Appendix I (attached), Planning Department staff recommend a modification to the Plan to allow for limited grandfathering of the Planning Department's TDM requirements in Central SoMa. As explained in Appendix I, should the Planning Commission choose to adopt this recommendation, they would need to amend Mitigation Measure M-NO-1a in the EIR to align with this policy directive in the CEQA findings.

An analysis of the remaining Plan Changes since Introduction and Issues for Consideration, as set forth in the May 3, 2018 Planning Commission packet, are included in Appendix I, attached. This analysis finds that these potential changes to the Central SoMa Plan have been adequately analyzed in the EIR and any amendments to the Central SoMa Plan, apart from that discussed above related to the allowable development on Key Sites, to incorporate these potential changes would not result in any changes to the EIR analysis and would 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). This document is being included in the EIR as a new Appendix I. Therefore, the following revision is made to the Draft EIR's Table of Contents' list of appendices on Draft EIR page vi:

[Appendix I. Analysis of Environmental Effects of Potential Changes Presented May 9, 2018 for the Central South of Market \(SoMa\) Plan](#)

Enclosures:

Appendix H. Central SoMa Plan Draft EIR Revisions Arising from Zoning Changes at Second and Harrison Streets

Appendix I. Analysis of Environmental Effects of Potential Changes Presented May 9, 2018 for the Central South of Market (SoMa) Plan



# memorandum

date May 2, 2018

to Jessica Range and Liz White, Environmental Planning

from Karl Heisler and Eryn Brennan

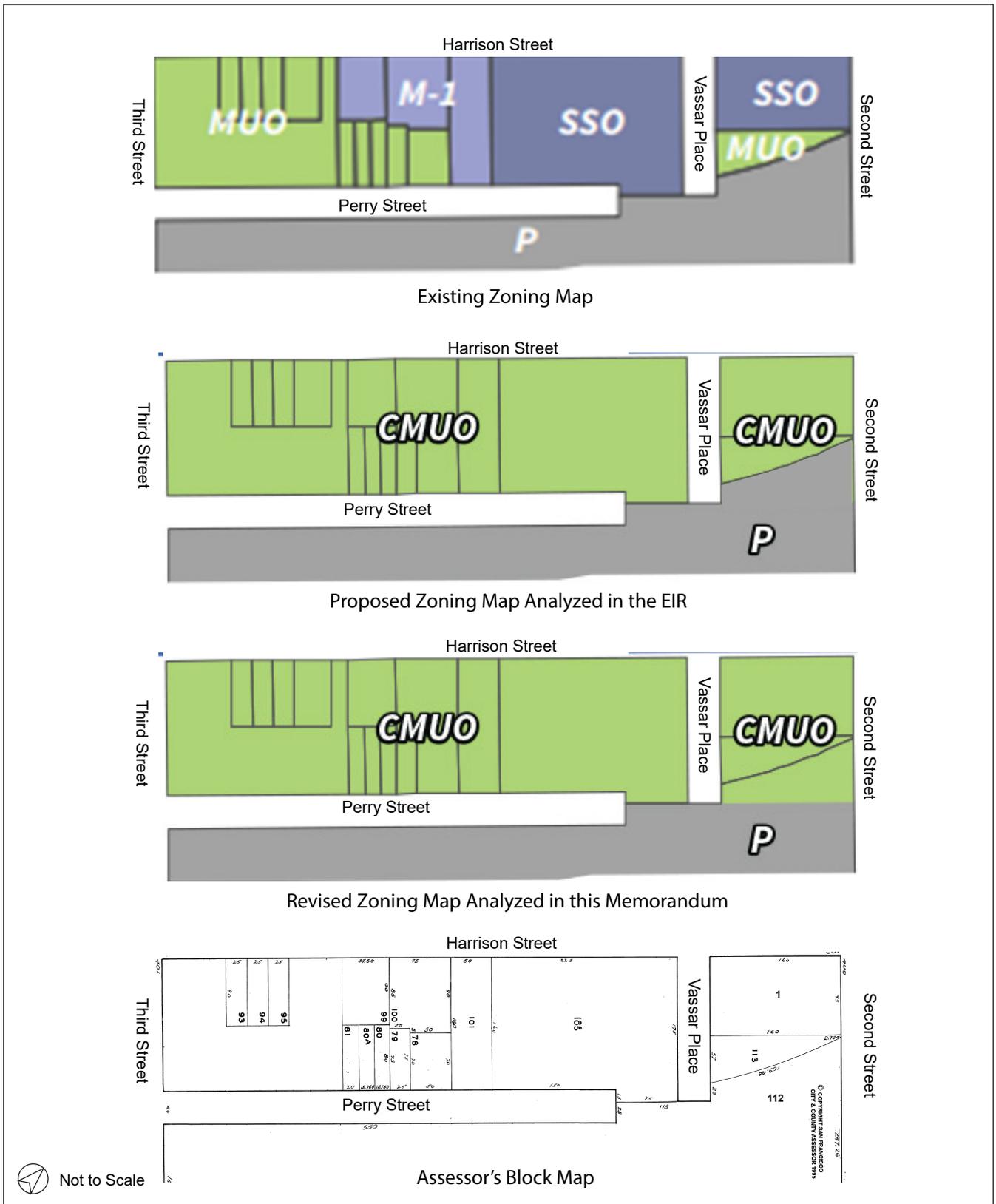
subject Central SoMa Plan EIR Revisions Arising From Zoning Changes at Second and Harrison Streets

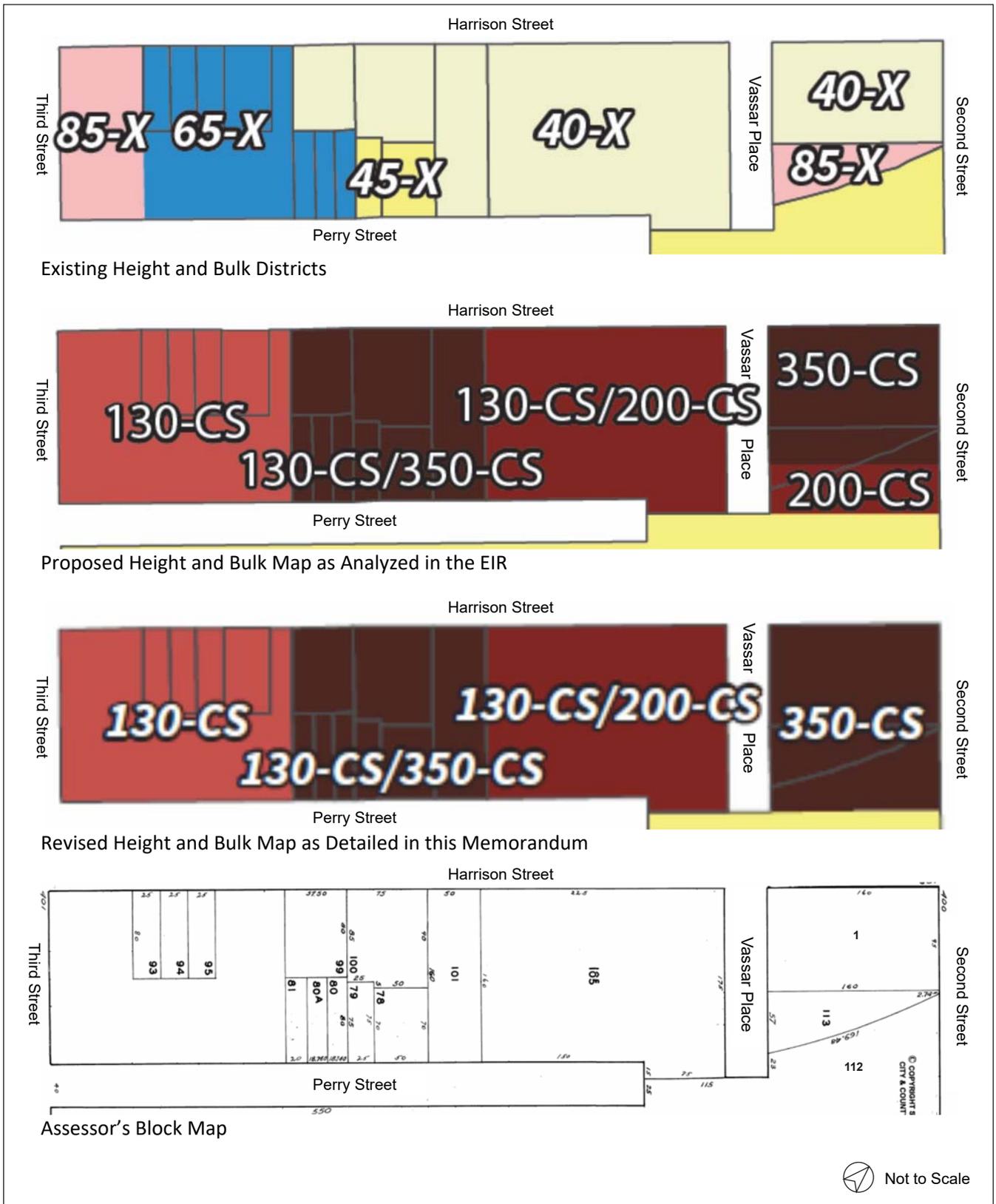
This memorandum evaluates changes in impacts that would result from a proposal by the Planning Department to alter the proposed Use District Map and Height and Bulk District Map (also referred to as “zoning maps”) from those analyzed in the Central SoMa Plan Environmental Impact Report (EIR)<sup>1</sup> for a small portion of the block bounded by Harrison, Second, Bryant, and Third Streets. Specifically, the proposal entails extending a Central SoMa Mixed Use-Office (CMUO) Use District onto an approximately 7,400-square-foot, irregularly shaped area at the north-easternmost portion of Block 3763, Lot 112. This area has approximately 77 feet of frontage on the west side of Second Street between Harrison and Bryant Streets, and tapers in a curve to 23 feet of frontage on Vassar Place, a mid-block, dead-end street that extends south from Harrison Street west of Second Street. The proposal would also extend a 350-CS Height and Bulk District to encompass the southern portion of this same 7,400-square-foot area (Block 3763, Lot 112), as well as the southwestern portion of Block 3763, Lot 113, which is an approximately 5,400-square-foot, irregularly shaped parcel immediately north of Lot 112. The net result of these changes for this 12,800-square-foot area would be to create a rectangular lot at the southwest corner of Second and Harrison streets with uniform zoning as to both use district and height and bulk district. The 160-by-175-foot parcel would total 28,000 square feet (0.64 acres) and would be entirely within a CMUO Use District and a 350-CS Height and Bulk District.

Currently, Lot 113 is in a Mixed-Use Office (MUO) Use District, while the northeastern portion of Lot 112 is in a Public (P) Use District as a result of its former use as California Department of Transportation (Caltrans) right-of-way.<sup>2</sup> The Plan, as analyzed in the EIR, proposed to rezone Lot 113 to CMUO and make no change to the northeastern portion of Lot 112, now also proposed as CMUO. Lot 113 is currently within an 85-X Height and Bulk District and the northeastern portion of Lot 112 is within a 45-X Height and Bulk District. The EIR evaluated the southern approximately 60 percent of the 12,800-square-foot area as a 200-CS Height and Bulk District, while the northern part of the area was evaluated as a 350-CS Height and Bulk District. See **Figure 1, Existing, Proposed, and Revised Use District Map for Block 3763**, and **Figure 2, Existing, Proposed, and**

<sup>1</sup> The Central SoMa Plan EIR consists of the Draft EIR, the Responses to Comments (RTC), and all errata issued by the San Francisco Planning Department following the publication of the RTC. All documents are available for review at: <http://sf-planning.org/central-soma-plan-environmental-review>.

<sup>2</sup> The 7,400-square-foot portion of Lot 112 owes its irregular shape to its former use within the right-of-way of the Terminal Separator Structure, a series of on- and off-ramps that connected the now-demolished Embarcadero Freeway to the elevated I-80 freeway.





SOURCE: San Francisco Planning Department

Case No. 2011.1356E: Central SoMa Plan

**Figure 2**  
Existing, Proposed, and Revised Height and Bulk Map for Block 3763

**Revised Height and Bulk District Map for Block 3763**, which depicts the existing height of the block, the proposed heights analyzed in the EIR, and the revised use district and height and bulk district now proposed. Draft EIR **Figure II-3, Proposed Plan Area Use Districts**, and **Figure II-7, Proposed Plan Area Height and Bulk Districts [Revised]** are also revised to show the changes.

The Planning Department has determined that the potential changes to the Use District and Height and Bulk District maps would not permit development at a density beyond that included in the population and employment growth forecasts that were the basis for the transportation modeling undertaken for the EIR by the San Francisco County Transportation Authority, and subsequent noise and air quality analyses.<sup>3</sup> The Planning Department quantified the potential development capacity associated with the proposed Use District Map and Height and Bulk District Map revisions and determined that the EIR's growth projections are conservative (i.e., high-end) estimates of potential growth because:

1. The EIR studied development capacity resulting from a maximum residential and maximum commercial build out scenario,
2. The EIR analyzed higher heights than those proposed under the Plan on certain sites, and
3. The Plan's limitations on tower bulk (discussed in detail below under Aesthetics) mean that the extension of the 350-CS Height and Bulk District southward toward the Interstate-80 (I-80) freeway would not permit a larger tower, in terms of floor area, than would already be permitted under the Plan, although the change in the Height and Bulk District Map would permit the tower to be built closer to the freeway than would otherwise be the case.<sup>4</sup>

Therefore, the additional growth facilitated by these revisions to the Plan is adequately captured by the EIR's growth projections. Accordingly, the Use District and Height and Bulk District map changes would not result in growth at levels in excess of that evaluated in the EIR. Additionally, the minimal physical distribution of anticipated development—south onto the approximately 7,400-square-foot portion of Block 3763, Lot 112, would not extend development to a previously unbuilt-upon location, given the former presence of the Caltrans Terminal Separator Structure on this site. Therefore, there is no need for further analysis of impacts resulting from these map changes to land use (division of a community or conflict with plans adopted to avoid environmental impacts); cultural and paleontological resources (historical, archeological, tribal, cultural, and unique paleontological resources and human remains); transportation (traffic, transit, pedestrian and bicycle circulation, loading, parking, and emergency vehicle access); air quality (consistency with the relevant clean air plan, traffic-generated emissions and construction emissions of criteria air pollutants and fine particulate matter and toxic air contaminants, and odors); noise (traffic-generated noise, noise generated by stationary sources, and construction noise); or hydrology (flooding risk and wastewater generation).

With regard to impacts analyzed in the Initial Study for the Plan, there would be no change in impacts related to population and housing, recreation, utilities, or public services because the intensity of development would not change. As the zoning changes would not rezone previously undeveloped land, there would be no substantial change in effects related to site-specific conditions, including biology; geology; hydrology other than flooding

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<sup>3</sup> Steve Wertheim, San Francisco Planning Department, "Zoning changes at Second and Harrison Streets (One Vassar)" memorandum to Jessica Range, April 17, 2018.

<sup>4</sup> The change in Use District from P to CMUO for the northeastern portion of Lot 112 would allow for a tower with about 6.5 percent more floor area than would otherwise be the case because the P Use District does not permit residential, office, or other commercial uses.

and wastewater, analyzed in the EIR, as noted above; or hazardous materials; mineral; energy; and agricultural and forestry resources, analyzed in the Initial Study.

Based on the foregoing, the potential changes in impacts compared to those analyzed in the EIR would be limited to three environmental topic areas: aesthetics, wind, and shadow. Each of these issues is discussed below.

## Aesthetics

### Analysis in the EIR

The EIR found that development pursuant to the Plan: (1) would not substantially degrade the visual character or quality of the Plan Area or substantially damage scenic resources; (2) would alter public views of the Plan Area from short-, mid-, and long-range vantage points and alter views into the surrounding neighborhoods from within the Plan Area, but would not adversely affect public views or have a substantial adverse effect on scenic vistas; and (3) would not create a new source of substantial light or glare in the Plan Area that would adversely affect day or nighttime views or substantially impact other people or properties. All aesthetic impacts were determined to be less than significant, and no mitigation measures were identified.

### Analysis of Proposed Changes to the EIR Zoning Maps

The proposed changes to the Use District and Height and Bulk District maps on Block 3763 would permit development on the west side of Second Street between Harrison Street and I-80 that would be closer to I-80 than what was analyzed in the EIR. However, the Plan includes tower controls for office and other non-residential, non-hotel buildings taller than 160 feet in height. These tower controls include a maximum individual floor plate of 17,000 square feet and a maximum average size for all tower floors in a building of 15,000 square feet, as well as maximum plan dimensions for towers of 150 feet in length and 190 feet in diagonal dimension. Buildings taller than 250 feet must also include additional reduction in massing of the upper one-third of the tower, compared to the lower two-thirds of the tower. Finally, the Plan would require a minimum distance of 115 feet between any two towers and minimum setbacks from the street of 15 feet for all towers. (All of these tower controls are similar to tower controls in the Downtown (C-3) Use Districts.) Together, these requirements would serve to reduce building massing, compared to what could otherwise be constructed. Because the overall site at the southwest corner of Second and Harrison streets is 160 feet wide by 175 feet deep (which results in a diagonal dimension of approximately 237 feet, compared to the maximum permitted 190-foot diagonal), a tower on that site would be required to include setbacks that would preclude a tower covering more than approximately 65 percent of the overall site. Therefore, a tower constructed in the 350-CS Height and Bulk District that is newly proposed to be expanded southward toward the I-80 freeway would have to include setbacks on all four sides to accommodate both street and interior lot line setback requirements. Because the minimum 15-foot setbacks on all four sides would not achieve the maximum permitted diagonal dimension, additional setback(s) would be necessary, likely on the west side to achieve the required tower separation from a potential tower across Vassar Place, where the maximum height limit would be 200 feet. Accordingly, while development on the site in question could be closer to the I-80 freeway, such development would likely occupy less of the lot width than had been assumed in the EIR. **Figure 3, Visual Simulation from I-80 Westbound, with Revision to Zoning Maps for Block 3763**, depicts modifications to Draft EIR Figure IV.B-19 to show the approximate outline of a potential building on the site in question that could be visible with the changes to the Use District and Height and Bulk District maps. As can be seen, the building would appear slightly taller than shown in the EIR because it would be closer to the

freeway; however, assuming setbacks as described above, the building could appear slightly narrower than depicted in the EIR. Therefore, the proposed change to the Use District Map and the Height and Bulk District Map would result in a relatively minor change in the view from the freeway.



SOURCE: Square One Productions; Environmental Science Associates, 2018

**Figure 3**  
Visual Simulation from I-80 Westbound, with Revision to Zoning Maps for Block 3763

The change in views from other viewpoints for which visual simulations were presented in the EIR would not be readily apparent. This is due to the combination of distance from the viewpoint to Block 3763 and the orientation of other Plan Area buildings. For example, in the view from Potrero Hill (Draft EIR Figures IV.B-13 and IV.B-14), the change in potential building envelope resulting from the southward extension of the 350-CS Height and Bulk District and increased height on the southern portion of the site in question would be largely obscured by a 400-foot tower that is illustrated at the corner of Fourth and Townsend streets. In the most distant view, from Corona Heights (Draft EIR Figures IV.B-15 and IV.B-16), the change in potential building envelope would be negligible. From the I-280 Sixth Street off-ramp (Draft EIR Figures IV.B-17 and IV.B-18), the change in potential building envelope would add a slight extension to a distant building modeled, resulting in an incremental amount of sky obscured, but not blocking any views of any natural or built features. Figure IV.B-19 is discussed above, and the site in question is not visible in the other EIR visual simulations (Figures IV.B-20 through IV.B-23). Accordingly, the only change to the EIR visual simulations necessary is to Draft EIR Figure IV.B-19.

In close-in views from the street, the change in potential building envelope could be noticeable, but not substantially so because of the bulk limitations discussed above. As discussed above, the changes to the Use District and Height and Bulk District maps would not make a substantial difference in the bulk of a potential tower that could be built on the site in question. The change to the Use District Map, however, would permit development on what is now a parking lot south of the existing building at 400 Second Street, a location that would not be buildable under the existing and current Plan-designated P Use District. However, most of this portion of the site in question would be occupied by a podium-level structure at a height of 85 feet, which would not result in a substantial change in street-level views compared to what would otherwise be allowed under the Plan.

As with the Use District and Height and Bulk District maps analyzed in the EIR, the proposed changes to the Use District and Height and Bulk District maps would not substantially degrade the visual character or quality of the area or its surroundings, would not have a substantial adverse effect on a scenic vista, and would not substantially damage scenic resources (as none exist in the Plan Area). Light and glare impacts would be similar to those discussed in the EIR because the proposed changes to the Use District and Height and Bulk District maps are consistent with other heights analyzed in the EIR.

Based on the foregoing, the revisions to the Use District and Height and Bulk District maps would not result in any new or substantially more-severe significant aesthetic impacts than identified in the EIR.

## Wind

### Analysis in the EIR

The EIR found that development anticipated under the Plan could alter wind in a manner that substantially affects public areas. This was found to be a significant effect of the Plan. Although mitigation in the form of building setbacks and other wind-reduction measures are identified in the EIR, the EIR concluded that, absent project-specific wind-tunnel testing that would be required for taller subsequent projects in the Plan Area, it could not be stated with certainty that each subsequent development project would be able to comply with the EIR's significance criterion without substantial modifications to the project's design and program such that the project would not be able to be developed to allowable building heights proposed by the Plan. Therefore, this impact was identified as significant and unavoidable.

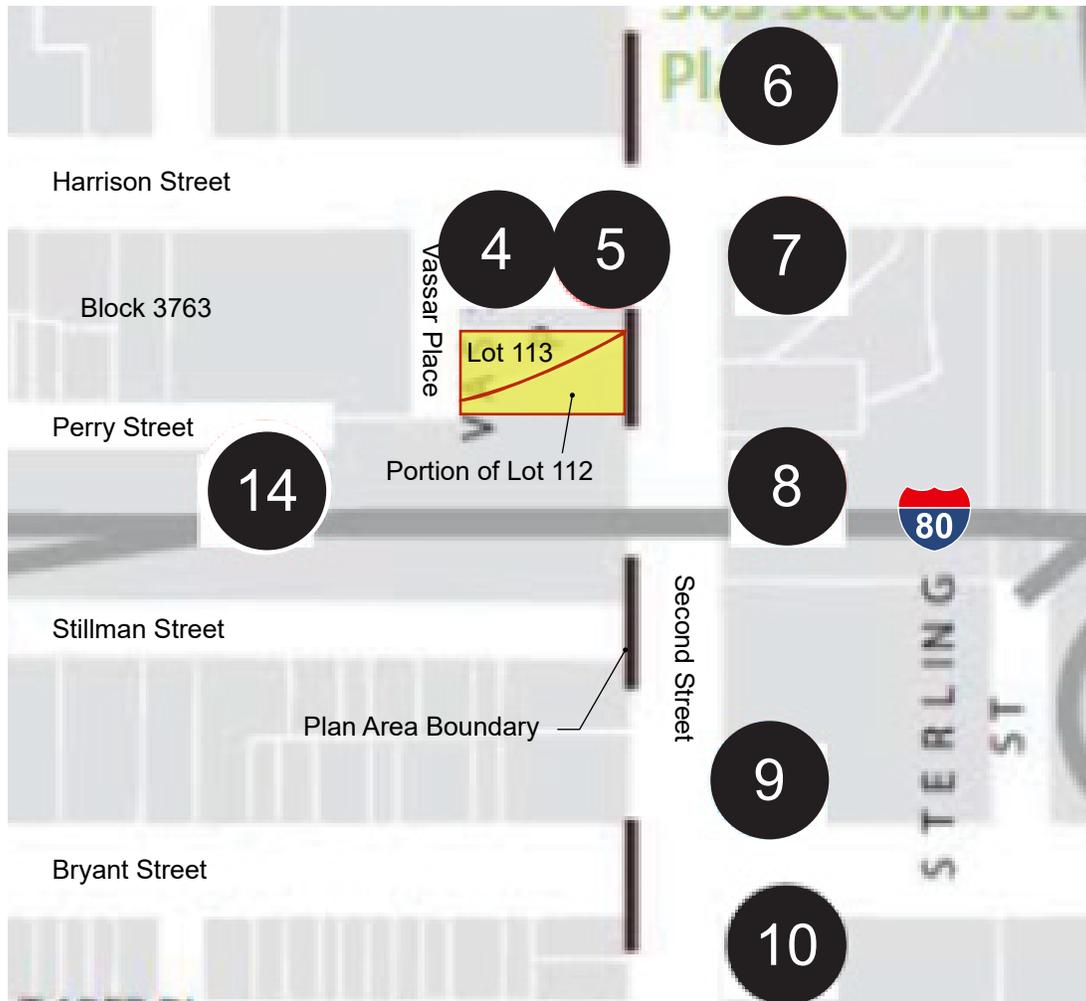
### Analysis of Proposed Changes to the EIR Zoning Maps

Programmatic wind-tunnel testing for the EIR was undertaken at the Plan level, based on the same building masses as evaluated in the visual simulations. In the vicinity of the proposed changes to the Use District and Height and Bulk District maps, wind test points were located at the following eight locations<sup>5</sup> (see **Figure 4, Wind Tunnel Test Points near Block 3763, Lots 112 and 113**):

- Two locations at and near the southwest corner of Second and Harrison streets, including along the Second Street frontage of the site in question and at the corner. These points would be at the base of a potential tower that would be permitted by the changes in the Use District and Height and Bulk District maps), Test Points 4 and 5;

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<sup>5</sup> For a complete map of the wind test points in the Plan Area, refer to Figure VI.G-2 in the EIR on page IV.G-8.



 Area of Proposed Zoning Map Changes

Test Location Number	Wind Comfort Criterion Speed (mph)	Existing Conditions		Existing Conditions		Speed Change Relative to Existing (mph)
		Equivalent Wind Speed Exceeded 10% of Time (mph)	% Time Wind Speed Exceeds Criterion	Equivalent Wind Speed Exceeded 10% of Time (mph)	% Time Wind Speed Exceeds Criterion	
4	11	9	4	13	16	4
5	11	7	3	17	32	10
6	11	6	0	9	2	3
7	11	7	2	14	22	7
8	11	9	2	12	12	3
9	11	13	17	10	8	2
10	11	8	2	8	2	0
14	11	6	1	13	14	7

 Not to Scale

**Figure 4**  
Wind Tunnel Test Points near Block 3763, Lots 112 and 113

- The northeast and southeast corners of Second and Harrison streets, Test Points 6 and 7;
- The east side of Second Street just north of the elevated I-80 freeway, Test Point 8;
- The northeast and southeast corners of Second and Bryant streets, Test Points 9 and 10; and
- The eastern terminus of Perry Street north of I-80, Test Point 14.

Existing conditions at the eight test points noted above are generally relatively calm, with the wind speed that is exceeded 10 percent of the time, or wind comfort speed, ranging from 6 miles per hour (mph) to 9 mph, except at the northeast corner of Second and Bryant Streets (Point 9), where the existing wind comfort speed is 13 mph, the speed at which winds typically begin to bother pedestrians.<sup>6</sup> With the exception of Test Point 9, all test points currently meet the 11-mph pedestrian comfort criterion contained in the Planning Code. (In general, conditions in SoMa are less windy than in very windy locations in San Francisco, such as the Van Ness and Market area.) The Planning Code's wind hazard criterion of 26 mph for one full hour of the year is not exceeded at any of the eight nearby test points under existing conditions.

Of the eight test points, the EIR wind-tunnel testing found that Plan Area development would increase the wind comfort speed at six locations, by 3 to 10 mph, with the greatest increases at the southwest and southeast corners of Second and Harrison streets and on Perry Street. Wind comfort speeds would decrease slightly with Plan development at the northeast corner of Second and Bryant streets and remain unchanged at the southeast corner of Second and Bryant streets. With Plan development, wind speeds at five of the eight test points would exceed the Planning Code's 11-mph comfort criterion. Wind speeds would not exceed the 26-mph hazard criterion at any of the eight locations under conditions with Plan development.

The following analysis specifically addresses potential wind impacts associated with the proposed changes in the Use District and Height and Bulk District Map to permit development to extend farther southward toward the elevated I-80 freeway (approximately 45 feet tall at the location nearest to Block 3763, Lots 112 and 113) and to increase the permitted height from 200 to 350 feet on a portion of Lot 12 and on Lot 13 of Block 3763. The proposed changes to the Use District and Height and Bulk District maps would not be anticipated to substantially alter the above results for the following reasons:

- For the closest test points to the proposed changes (Test Points 4 and 5, at Second and Harrison streets), extending the development envelope toward the freeway and increasing the permitted building height in the southern portion of the site in question would result in only a negligible change in wind conditions because the permitted overall building height would not change and, in particular, the permitted height at the street wall along Harrison Street would not change. Prevailing northwest, west, and southwest winds would be diverted by a proposed building at a height of 350 feet, much as would be the case for the Plan zoning maps analyzed in the EIR. In particular, Test Point 5, where the wind comfort speed would increase by 10 mph to 17 mph with Plan development, would be comparably windy with the proposed Use District and Height and Bulk District map changes.

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<sup>6</sup> The wind speed that is exceeded 10 percent of the time (with turbulence factored into the speed) is the speed relied upon in the Planning Code for evaluation of pedestrian comfort. This "wind comfort speed" is useful as a general measure of typical maximum wind speeds, since winds are at or below this speed 90 percent of the time.

- Test Points 6 and 7 are located across Second Street from the site in question. The zoning map changes would not substantially affect these points because, as with Points 4 and 5, Points 6 and 7 would be primarily influenced by the height and massing along Harrison Street, which would not be altered, and by the west-facing façade. Although the changes would permit the west-facing façade to extend southward toward the freeway, any effect of changes in potential building mass at this location on Test Points 6 and 7 would be ameliorated by the remainder of the potential building mass, which would be closer to those points and therefore exert more influence with respect to pedestrian winds.
- Test Point 8 is across Second Street from the southeast corner of the site in question. The southward extension of the potential building mass and the increase in height to 350 feet on the southern portion of the site in question could provide some shielding of this test point from prevailing northwest, west, and southwest winds. Moreover, this test point is adjacent to the elevated I-80 freeway, some 45 feet in height, which would tend to function somewhat like a building podium in slowing winds descending from taller buildings. The wind comfort speed at Test Point 8, therefore, would not be anticipated to increase substantially with the zoning map changes, compared to what was reported in the EIR.
- The other two test points (9 and 10), while downwind from the location of the proposed Use District and Height and Bulk District maps changes with respect to northwest winds, are 400 feet or more from the potential 350-foot-tall building on the site in question. Moreover, these test points are partially sheltered by the adjacent elevated I-80 freeway (approximately 45 feet in this location) and by the existing 50-foot-tall building at the northeast corner of Second and Bryant streets, both of which would further limit any effect on wind from the potential 350-foot-tall building that could be built at the site in question. Therefore, wind speeds at these two test points also would be only minimally altered by the Use District and Height and Bulk District map changes, as compared to wind speeds reported in the EIR.
- Test Point 14, on Perry Street, is located closest to the southwest corner of the potential building mass that could be permitted as a result of the changes to the Use District and Height and Bulk District maps. The southwest and northwest building corners often result in the greatest change in pedestrian winds due to their role in diverting winds that strike a building's west-facing facing façade. Therefore, southward extension and increasing the height of the west-facing façade of a building on this site could result in greater ground-level winds near the southernmost point of Vassar Place. However, Test Point 14 is approximately 150 feet upwind of the potential building and is likely to be more affected by development on the west side of Vassar Place, which, along with the adjacent I-80 freeway, would shield this location from prevailing winds. Accordingly, the proposed changes to the Use District and Height and Bulk District maps would not result in substantially greater wind effects at Test Point 14 than were reported in the EIR. It is noted that required project-specific wind-tunnel testing would further evaluate whether conditions in Vassar Place would be adversely affected.

Based on the foregoing, the revisions to the Use District and Height and Bulk District maps would not result in any new or substantially more-severe significant wind impacts than identified in the EIR. Furthermore, projects proposed within the Central SoMa Plan Area outside of a C-3 Use District at a roof height greater than 85 feet would be required to be evaluated by a qualified wind expert to determine their potential to result in a new wind hazard exceedance or aggravate an existing pedestrian-level wind hazard exceedance. If the expert determines this would be the case, the project may be required to undergo wind-tunnel testing.

## Shadow

### Analysis in the EIR

The EIR found that development under the Plan would not create new shadow in a manner that substantially affects existing outdoor recreation facilities or other public areas. This impact was determined to be less than significant, and no mitigation measures were identified. The EIR found that Plan Area development would add new shadow to three parks (South Park, Victoria Manalo Draves Park, and Gene Friend Recreation Center) under the jurisdiction of the Recreation and Park Commission and, therefore, is subject to Planning Code Section 295. However, the EIR found that the relatively minimal new shadow would not be anticipated to adversely affect the use of these parks, and the effect was, therefore, found to be less than significant. The EIR also found that Plan Area development would add new shadow to two non-Planning Code Section 295 open spaces—the Alice Street Community Garden and the Yerba Buena Center Children’s Garden. Again, however, the relatively small shadow increment was determined not to adversely affect the use of these spaces, and the effect was found to be less than significant. Likewise, Plan-generated shadow was found to result in less-than-significant impacts on nearby POPOS.

### Analysis of Proposed Changes to the EIR Zoning Maps

The EIR employed programmatic shadow modeling to support its analysis, based on the same building masses as evaluated in the visual simulations and wind-tunnel testing. This analysis specifically addresses potential new shadow impacts associated with the proposed changes in the Use District and Height and Bulk District Map to permit development to extend farther southward toward the elevated I-80 freeway and to increase the permitted height from 200 to 350 feet on a portion of Lot 112 and on Lot 113 of Block 3763. To evaluate the potential for the proposed Use District Map and Height and Bulk District Map changes to result in new or more-severe shadow effects, the modeling was revised to incorporate the larger potential building mass that could be built at the location of the zoning map revisions. The results of the modeling show that the only open space for which shadows would be different than those reported in the EIR is the POPOS at 303 Second Street, across both Second and Harrison streets from the site in question. However, the increase in net new shadow resulting from the proposed zoning map changes would be limited. For example, of the 37 hourly shadow projections presented for the solstices and equinoxes in EIR Appendix E, there would only be one instance in which the potential building mass resulting from the proposed changes to the Use District and Height and Bulk District maps would increase shadow on the 303 Second Street POPOS. This would be at 10:00 a.m. on the winter solstice in December, when the longer eastern frontage of the potential building mass on the site in question would move the line of net new shadow eastward into the POPOS. There would also be a small increase in net new shadow on the spring/fall equinoxes at 12:00 noon (the time depicted in Draft EIR Figure IV.H-6); however, at this time, the increased shadow would fall only on Second Street and its sidewalks, and not on the POPOS. **Figure 5, Net New Shadow Resulting from Zoning Map Changes**, depicts the changes in shadow resulting from the proposed changes to the Use District and Height and Bulk District maps. Given the very limited new shadow compared to that reported in the EIR, use of the 303 Second Street POPOS would not result in substantially more severe adverse impacts than those reported in the EIR. Therefore, shadow effects would remain less than significant with the revised height and bulk limits, as was reported in the EIR.

In addition to shadow impacts shown in Figure 5, the potential building mass resulting from the change in the zoning maps would add some new shadow to Second Street sidewalks in the afternoon year-round, owing to the

increased cross-section of the building mass (i.e., increased depth as measured from Harrison Street). However, no other open spaces, either public or private, would be affected, compared to what was analyzed in the EIR. This incremental increase in shading would be consistent with typical urban shadows, including in other parts of the Plan Area where new buildings could be constructed, and would not be anticipated to adversely affect the use of nearby sidewalks, given that sidewalks are typically used for pedestrian travel from one location to another. With the changes in the Use District and Height and Bulk District maps, and similar to conditions without the change, shadows upon streets and sidewalks would not exceed levels commonly expected in urban areas and would be considered a less-than-significant effect under CEQA. Although occupants of nearby property may regard the increase in shadow as undesirable, the limited increase in shading of private properties as a result of the proposed project would not be considered a significant impact under CEQA. This conclusion would hold true both with and without the revised Use District and Height and Bulk District maps.



SOURCE: Fastcast; Environmental Science Associates, 2018

**Figure 5**  
Net New Shadow on 303 Second Street POPOS Resulting from Zoning Map Changes

Based on the foregoing, the revisions to the EIR Use District and Height and Bulk District maps (Draft EIR Figure II-3, p. II-11, and Figure II-7, p. II-19) would not result in any new or substantially more-severe significant shadow impacts than identified in the EIR.

## **Conclusion**

The proposed revisions to the EIR Use District Map and Height and Bulk District Map on Block 3763, Lots 112 and 113, would not result in any new or substantially more-severe significant impacts with respect to aesthetics, wind, or shadow, or any other CEQA topic, than those that were identified in the EIR.

## **Attachments**

Appendix A. Memorandum from Steve Wertheim, Citywide Policy and Analysis, April 17, 2018



# SAN FRANCISCO PLANNING DEPARTMENT

**MEMO**

**Date:** April 17, 2018  
**To:** Jessica Range, Principal Environmental Planner  
**From:** Steve Wertheim, Project Manager  
**Re:** Zoning changes at Second and Harrison Streets (One Vassar)

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## Introduction

The Central SoMa Plan is a comprehensive plan for the area surrounding much of the southern portion of the Central Subway transit line. The Plan Area includes roughly 230 acres that comprise 17 city blocks, as well as the streets and thoroughfares that connect SoMa to its adjacent neighborhoods: Downtown, Mission Bay, Rincon Hill, and the Mission District. In December 2016, the San Francisco Planning Department published a Draft Environmental Impact Report (EIR) for the proposed project and circulated the Draft EIR for public review and comment. On March 28, 2018, the San Francisco Planning Department published the Responses to Comments (RTC).

## Purpose of this Memorandum

On April 10, 2018, Mayor Farrell and Supervisor Kim introduced a substitute Central SoMa Zoning Map Ordinance. That ordinance included two additional changes that had not been previously analyzed for conformance with the Project Description analyzed in the Central SoMa EIR, as follows:

- On Block 3763 Lots 112 and 113, the height limit was increased from 200 feet to 350 feet on the portion between 145 feet and 175 feet from Harrison Streets (refer to Figure 1. Existing, Proposed and Revised Height and Bulk Map for Block 3763)
- On Block 3763 Lot 112, allowable zoning was changed from Public (P) to Central SoMa Mixed-Use Office (CMUO) (refer to Figure 2. Existing, Proposed, and Revised Zoning District Map for Block 3763)

The purpose of this memorandum is to document why the changes to the Central SoMa Height and Bulk and Zoning District maps would not result in growth beyond that included in the population and employment growth forecasts, which informed the impact analysis in the Central SoMa Plan EIR.

Figure 1. Existing, Proposed, and Revised Height and Bulk Map for Block 3763

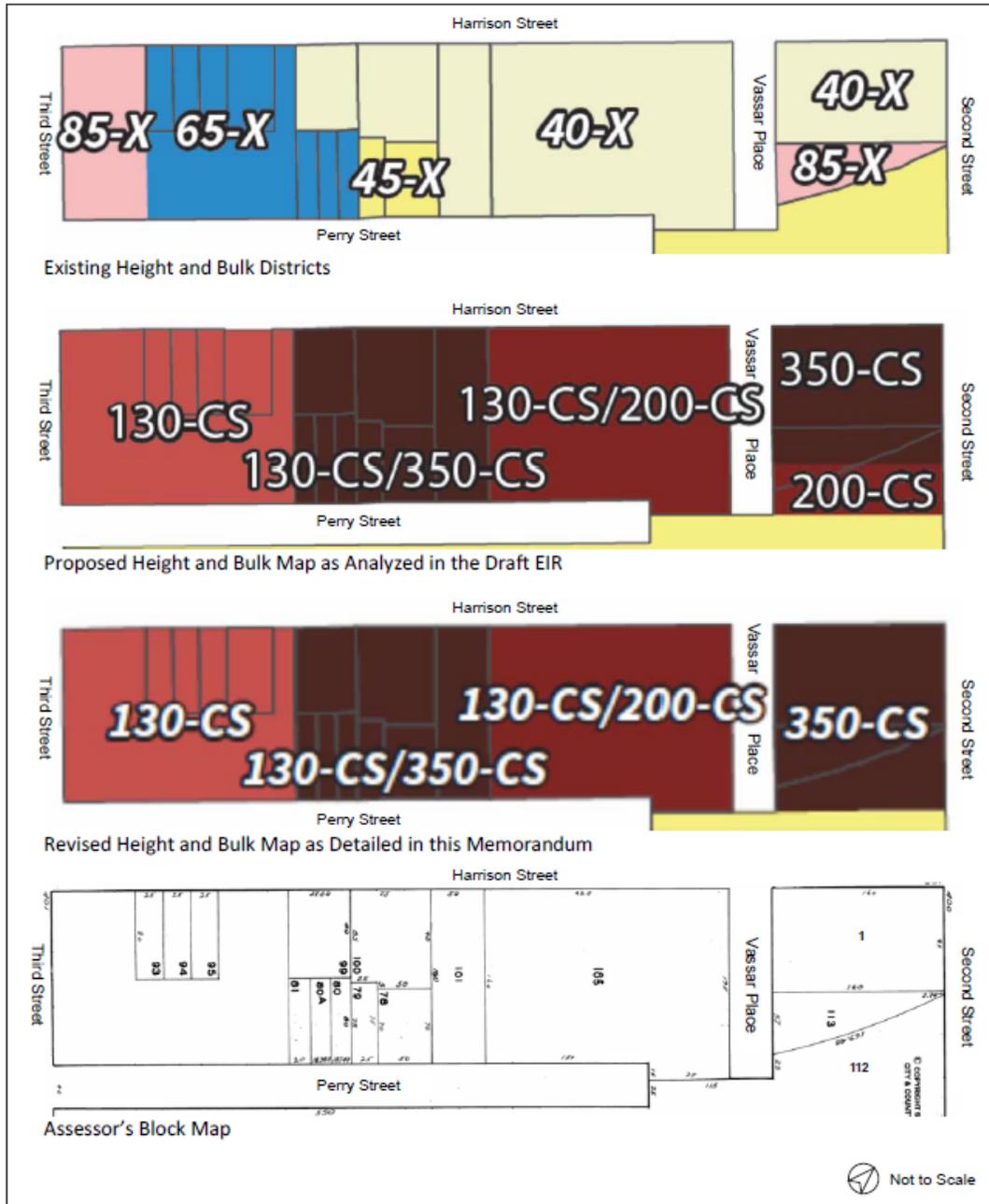
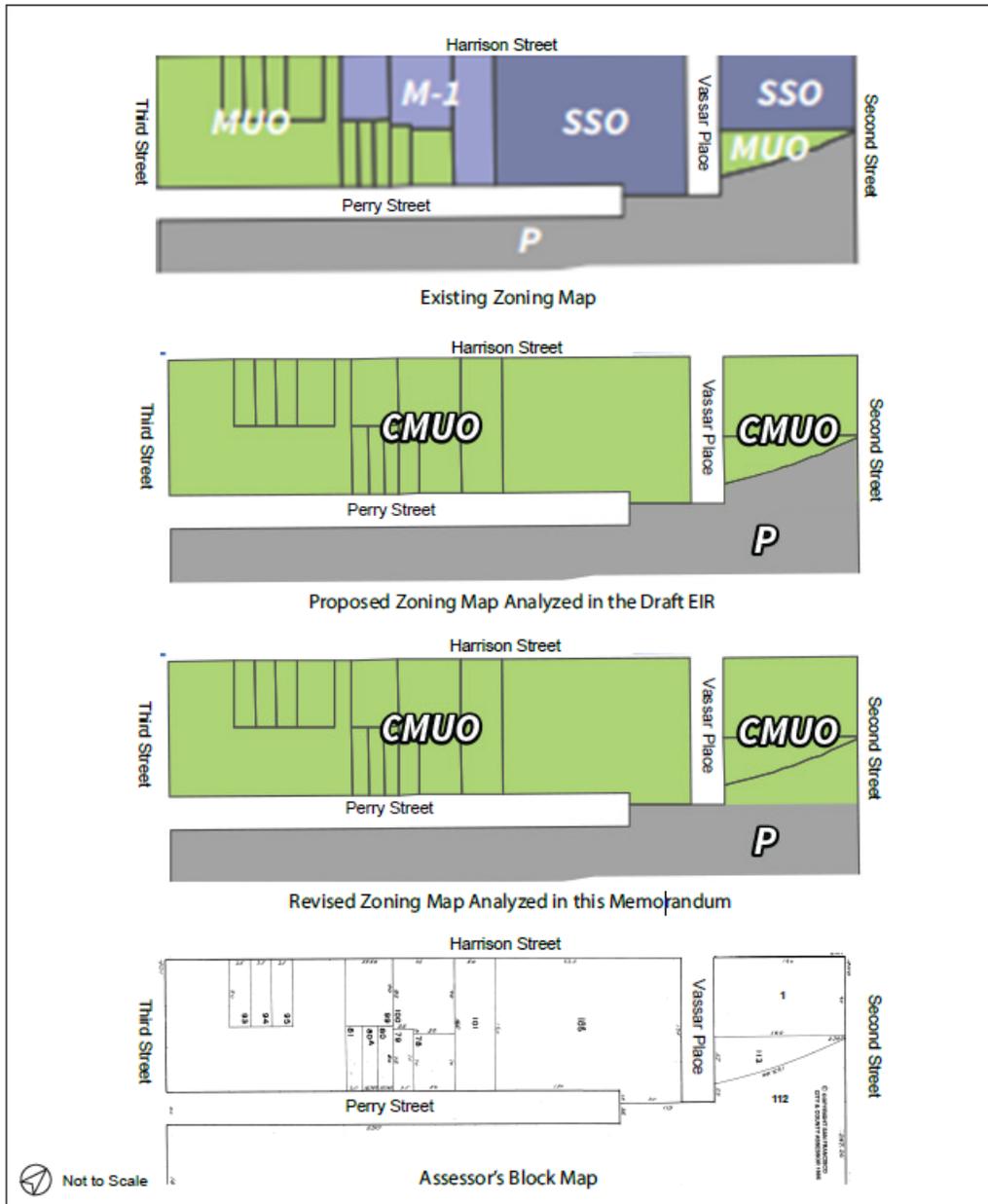


Figure 2. Existing, Proposed, and Revised Zoning District Map for Block 3763



## Analysis

These parcels are associated with the proposed office building at 400 2<sup>nd</sup> Street (Planning Department Case 2012.1384) which also would be located on Block 3763 Lot 001. This office building is proposed to be up to 350 feet in height and be 535,000 gross square feet. It would replace an existing office building of 113,484 gross square feet, resulting in an increase of 421,516 gross square feet of office.

The changes included in the April 10, 2018 version of the Zoning Map Ordinance would not increase development capacity of this office building beyond what was studied in the Central SoMa EIR, for the following reasons:

- The Central SoMa Plan requires that office buildings taller than 160 feet in height have an average floor area of 15,000 square feet above 85 feet in height. Such a tower could be accommodated within the previously proposed height limits. The increase in the height limit for a portion of the site enables the potential tower to move within the site. However, it does not change the development capacity of the tower.
- The rezoning from P to CMUO would enable new development on this portion of Block 3763 Lot 112. However, this development was anticipated in the EIR based on the previous submittals of the project sponsor. Based on these previous submittals, the EIR anticipated 427,300 square feet of new development,<sup>1</sup> which is greater than the 421,516 net new gross square feet proposed by the new development.

## Conclusion

The changes to the Central SoMa Plan EIR Height and Bulk and Zoning Use District Maps would not result in growth beyond that included in the population and employment forecasts, which informed the impact analysis in the Central SoMa Plan EIR.

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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.



# SAN FRANCISCO PLANNING DEPARTMENT

**MEMO**

**DATE:** May 9, 2018

**TO:** Planning Commission

**FROM:** Jessica Range and Elizabeth White, Environmental Planning  
Steve Wertheim, Citywide Planning

**RE:** Analysis of Environmental Effects of Potential Plan  
Changes Presented May 3, 2018 for the Central South of  
Market Area (SoMa) Plan  
Planning Department Case No. 2011.1356E

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The May 3, 2018 Planning Commission packet includes (1) changes to the Central SoMa Plan since introduction, (2) a list of modifications recommended by Planning Department staff, and (3) a list of “Issues for Consideration” (which are proposals for changes to the Central SoMa Plan received from the public during the public review process). This memorandum evaluates the environmental effects of all three of these categories of information, in the event decision makers choose to incorporate additional changes into the Central SoMa Plan.

## Changes to the Central SoMa Plan since Introduction

The Environmental Planning Division of the Planning Department has reviewed changes to the Central SoMa Plan, as they appear in the May 3, 2018 Planning Commission Packet. The following conclusions are made (references to the location of these changes in the May 3, 2018 Planning Commission packet are provided in parentheses):

- Changes to the Central SoMa General Plan Amendments Draft Ordinance since introduction (Exhibit II.6) were determined not to result in physical environmental effects.
- Changes to the Zoning Map Amendments Ordinance since introduction (Exhibit IV.4): (1) correct a drafting error, (2) change the allowable zoning on certain blocks and lots from West SoMa Mixed Use Office (WMUO) to Central SoMa Mixed-Use Office (CMUO); and (3) change the allowable zoning for Block 3763, Lot 112 and change the allowable heights for this block and lot along with Lot 113. The changes from the correction of a drafting error were determined not to result in physical environmental effects, the changes to proposed zoning from WMUO to CMUO are evaluated in an erratum issued on April 5, 2018, and changes to the zoning and

height at Block 3763 were evaluated in a second erratum issued on May 9, 2018 and in Environmental Impact Report (EIR) Appendix H.

- Changes to Planning Code and Administrative Code Amendments Ordinance since introduction (Exhibit III.5) correct or clarify the Planning Code Amendments, or were determined to not result in environmental effects, with the exception of changes to the Planning Code that require sites to be commercially-oriented, changing this requirement from sites that are 30,000 square feet in area to sites that are 40,000 square feet in area. The environmental effects of this change to the Planning Code were evaluated in an erratum issued on April 5, 2018 and determined not to result in new significant effects or effects of greater severity than that disclosed in the EIR.
- Changes to the Central SoMa Plan Implementation Program since introduction (Exhibit V.4) merely implement changes to the General Plan, Planning Code, and Zoning Map amendments as discussed above, or were determined not to result in physical environmental effects. It should be noted that an implementation measure identifies funding for a potential park at 1133 Mission Street. The EIR, at a programmatic level, evaluates the environmental effects of the creation of a new park within or near Central SoMa. Once a specific proposal is put forth, additional environmental review may be required to ensure that the environmental effects of the park are adequately addressed in the EIR.

In summary, the above changes to the Central SoMa Plan have been adequately evaluated in the EIR and the revisions made to the EIR to address these changes are presented in errata dated April 5, 2018 and May 9, 2018 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).

## Recommended Modifications and Issues for Consideration

In addition to the above changes to the Central SoMa Plan, the May 3, 2018 Planning Commission packet contains recommended modifications to the Planning Code and Administrative Code Ordinance (contained in Exhibit III.1) and additional zoning map, Planning and Administrative Code, and implementation program “issues for consideration” (Exhibits IV.5, III.6, and V.5, respectively). These “issues for consideration” are proposals for changes to the Central SoMa Plan received from the public during the public review process. The following contains an analysis of the environmental effects of these recommended modifications and issues for consideration, should decision makers choose to include them in the Central SoMa Plan. In this analysis, staff has determined that, apart from the following item (which is not currently recommended by staff), the changes merely clarify or make corrections to the current proposal, or would not result in environmental effects beyond that analyzed

in the EIR.

**Issue not covered in the EIR analysis:** Setting the maximum development capacity at each site at the level listed in the Key Development Sites Guidelines, rather than the formula provided in Section 263.32(c)(1).

**Rationale:** The proposed Planning Code formula setting development capacity for the Key Sites was developed to ensure that development on Key Sites does not exceed the growth projected under the EIR. It is unclear how setting maximum development capacity according to the Key Development Sites Guidelines would affect the overall growth anticipated and evaluated in the EIR. More information regarding the effects of this proposal on the Plan's anticipated growth projections would be required before the Commission adopts this proposal in order to assess whether the environmental effects of the proposal are adequately addressed in the EIR. Furthermore, the Planning Department staff do not recommend the Central SoMa Plan be amended to incorporate this request.

The following issues require additional explanation as to how the environmental effects of these issues are addressed in the Draft EIR:

1. For the area north of Harrison Street, change the proposed zoning from CMUO to Mixed-Use General (MUG) or Mixed-Use Residential (MUR)

*Analysis:* Under the zoning proposed in the Central SoMa Plan and analyzed in the EIR, it is anticipated that the currently proposed zoning change to this area, which would create a uniform zoning of CMUO, could result in approximately 3,000 jobs (680,000 square feet of commercial space) and 1,100 residential units (1,330,000 square feet of residential space).<sup>1</sup> If the CMUO zoning district north of Harrison Street was rezoned to MUG or MUR (which limits office uses), it is estimated that this zoning change would result in 2,500 jobs (550,000 square feet of commercial space) and 1,250 residential units (1,500,000 square feet of residential space). The proposal would result in a loss of 500 jobs and a gain of 150 residential units in the Central SoMa Plan Area.

As explained in EIR Appendix G (attachment to the EIR, provided in an erratum issued April 5, 2018), other changes to the Central SoMa Plan have resulted in changes to the Plan's growth projections. Specifically, based on the amendments to the Plan addressed in the April 5, 2018 erratum, the Plan is anticipated to result in 8,300 net new housing units and 34,250 jobs. These changes to the Plan were determined to be within the growth projections used as the basis for the EIR's quantitative analysis as shown in Table IV-1, Summary of

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<sup>1</sup> Wertheim, Steve (San Francisco Planning Department), "MUO to MUG". Email communication to Jessica Range and Elizabeth White. April 17, 2018.

Growth Projections on Draft EIR page IV-6. The EIR analyzes an increase of 14,500 residential units within the EIR study area, of which 8,320 units are anticipated to occur in the Plan Area and an increase of 63,600 jobs within the EIR study area, of which 44,000 are anticipated to occur within the Plan Area.<sup>2, 3</sup> The above change in zoning (from CMUO to MUG or MUR) would change the Plan's overall growth projections, resulting in a total of 8,450 housing units and 33,750 jobs. These changes would result in growth projections for the number of residential units exceeding those for the Plan Area that were used as the basis for the EIR by 130 units. However, the changes to the Plan that have taken place since publication of the Responses to Comments document would also result in a reduction of about 10,250 jobs within the Plan Area. As such, it can be reasonably concluded that the environmental effects of an additional 130 residential units within the Plan Area, beyond that anticipated in the EIR, would be off-set by a reduction in environmental effects anticipated to occur as a result of approximately 10,000 fewer jobs being developed within the Plan Area. Therefore, there would be no substantial change to the EIR's analysis for topics that rely upon the EIR's growth projections (transportation; noise; air quality; and hydrology and water quality). Similarly, because the overall intensity of development under the Plan would still be within that which was studied in the EIR, there would be no change to impacts identified in the initial study related to population and housing, recreation, utilities or public services.

Furthermore, the rezoning of CMUO north of Harrison Street to MUG or MUR would not change height and bulk proposals studied in the EIR, and therefore, would not result in changes to the aesthetics, shadow, or wind analysis in the EIR. Additionally, there would be no change in the location of projected development, and no significant changes in construction techniques. As such, there would be no substantial change in effects related to site-specific conditions, including: land use and land use planning, cultural and paleontological resources, biology, geology, hazardous materials, mineral resources, energy, and agricultural and forestry resources.

For the above reasons, including this change to the Central SoMa Plan's proposed zoning would not result in overall growth beyond that anticipated by the Plan and therefore would not result in increased physical environmental effects beyond that already studied in the EIR and would not constitute new significant information that requires recirculation of the EIR under CEQA and the CEQA Guidelines.

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<sup>2</sup> Errata to the Environmental Impact Report for the Central South of Market (SoMa) Area Plan. April 5, 2018. Available at: [http://sfmea.sfplanning.org/Central\\_SoMa\\_EIR\\_Errata\\_April52018.pdf](http://sfmea.sfplanning.org/Central_SoMa_EIR_Errata_April52018.pdf)

<sup>3</sup> Central SoMa Draft Environmental Impact Report. Appendix G. Analysis of Environmental Effects of Plan Changes Presented April 5, 2018 for the Central South of Market (SoMa) Plan. April 5, 2018.

2. Prohibit large office uses (greater than 50,000 square feet) in the area currently zoned Service, Arts, Light Industrial (SALI) except for Key Sites

*Analysis:* This change would allow small office, retail and institutional uses to be developed and was determined to not substantially affect the growth projections used as the basis for the analysis in the EIR.

3. Do not eliminate the grandfathering clause for compliance with the Transportation Demand Management requirements

*Analysis:* The current Planning Code Transportation Demand Management (TDM) requirements allow for grandfathering of certain projects with applications on file with the Planning Department and would reduce the TDM requirements of the Central SoMa Plan for these projects. Projects that meet the current eligibility requirements, which include a number of Central SoMa projects, are required to meet 50% of the TDM requirements. The Planning Department proposes to include a more limited grandfathering provision in the Central SoMa Plan, requiring projects with complete development applications or environmental evaluation applications on file before January 1, 2018, to meet 75% of the TDM requirements, and not 100% of the TDM requirements. The EIR found that noise and air quality impacts from traffic generated by subsequent development projects would be significant and unavoidable. Mitigation Measure M-NO-1a: Transportation Demand Management for New Development was identified in the EIR prior to adoption of the current TDM Ordinance. This mitigation measure would apply the equivalent of the current TDM requirements to projects within the Central SoMa Plan area, with not grandfathering. Thus this measure would reduce the number of vehicle trips generated by subsequent development projects to a greater degree than under the current requirements. The EIR determined that because it is uncertain the degree to which this mitigation measure could reduce traffic noise to a less than significant level, noise (and air quality) impacts would be significant and unavoidable.

Including a grandfathering clause as part of the Central SoMa TDM requirements, as described above, would reduce the effectiveness of TDM measures to reduce vehicle trips and subsequent noise and air quality effects. However, increased noise and air quality effects resulting from reduced TDM requirements that would occur under a grandfathering clause would be limited, as it would only apply to approximately 20 projects within the Plan Area and these projects would still be required to incorporate a substantial number of TDM measures into their project. In addition, the EIR concludes, in Impact TR-8, Emergency Vehicle Access, that the Central SoMa Plan would result in a significant impact to emergency vehicle access. The EIR concludes that with implementation of mitigation

measures M-TR-8, M-TR-3a, M-NO-1a, and M-AQ-5e, this impact would be reduced to less than significant. Including a grandfathering clause as part of the Central SoMa TDM requirements would not affect the EIR's significance determination for Impact TR-8 related to emergency vehicle access because, as stated above, the grandfathering clause would apply to a limited number of projects, which would still be required to implement a substantial number of TDM measures. Additionally, this mitigation measure and three other mitigation measures (M-TR-8, M-TR3a, and M-AQ5e) would all contribute to reducing this impact to less than significant levels.

Should the Planning Commission adopt the Central SoMa Plan with the proposed TDM requirements, which allow for grandfathering, the Commission would need to amend Mitigation Measure M-NO-1a in the EIR to align with this policy directive. This would be accomplished through the CEQA findings.

4. Various amendments that would increase or decrease the total amount (in square feet) of open space or POPOS that may be developed under the Plan

*Analysis:* The list of issues for consideration includes various requests to modify the Planning Code requirements that would either increase or decrease the amount of open space or POPOS that would ultimately be developed on private property under the plan (whether private open space or publicly-accessible open space). However, these proposals would not entirely eliminate the requirement for subsequent development projects to provide open space. Additionally, POPOS and open space requirements are intended to be a complement, not a substitute for neighborhood and regional parks or other recreational facilities. Residents and workers within the Central SoMa Plan area would have access to existing open spaces such as Yerba Buena Gardens and South Park in the Plan Area and nearby facilities, in addition to additional parks and open spaces proposed under the Plan. Therefore, even with changes that could reduce the amount of open space required by the Central SoMa Plan, it is not anticipated that the plan would result in the physical deterioration of recreational resources and impacts to recreational resources would remain less than significant. This analysis concludes that the potential changes to the Plan's open space requirements would still result in a less-than-significant impact to recreation and that the Central SoMa Initial Study analysis remains valid.