



SAN FRANCISCO PLANNING DEPARTMENT

Third Addendum to Final Environmental Impact Report

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 Long Range Development Plan (LRDP)
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Lot Size: Various
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REMARKS

The California Pacific Medical Center (CPMC) Long Range Development Plan (LRDP) is a multi-phased plan to meet State seismic safety requirements for CPMC hospitals; expand its medical facilities and create a 20-year framework for CPMC's four existing medical campuses (Pacific Campus at Sacramento and Buchanan streets, California Campus at Maple and California streets, Davies Campus at Castro and 14th streets, and St. Luke's Campus at Cesar Chavez and Valencia streets); as well as construct a new medical campus (Cathedral Hill Campus at Van Ness Avenue and Geary Boulevard/Street) in San Francisco.

This third addendum to the CPMC LRDR Final Environmental Impact Report (FEIR) describes the originally proposed CPMC LRDP that was analyzed in the FEIR (referred to in this document as the "previous project"); provides a summary of proposed changes to the previous project, which is the subject of this addendum (referred to in this document as the "revised project"); and analyzes the potential environmental effects of the revised project in the context of the FEIR.

Background

The San Francisco Planning Commission certified the FEIR and approved the LRDP on April 26, 2012. The FEIR was subsequently appealed on May 16, 2012. The Board of Supervisors first heard the appeal on July 17, 2012, and continued the appeal hearing to March 12, 2013. On March 12, 2013, the Board of Supervisors unanimously voted to uphold the certification of the FEIR.

After certification of the FEIR, and during the pendency of the appeal (between July 17, 2012 and March 12, 2013), CPMC made amendments to the originally proposed LRDP to include a smaller Cathedral Hill Campus and a larger St. Luke's Replacement Hospital. The principal changes at the St.

Luke's Campus included the following: an addition of two floors (increasing the total from five to seven floors) and 43 feet (increasing the total height from 99 to 142 feet); 80,890 gsf of hospital space (increasing the total hospital floor area from the previously planned 154,800 to 235,690 gsf); and 40 additional licensed acute care beds (increasing the total from 80 to 120 beds) at the proposed St. Luke's Campus Hospital. On May 9, 2013, the planning department found no additional significant environmental impacts or increase in the severity of significant impacts identified for the project and issued an addendum (referred to as the "first addendum").

On December 12, 2014, CPMC submitted a revised transportation management plan for the proposed Cathedral Hill Campus' Van Ness Avenue (US-101) Pedestrian Tunnel, which amended the pedestrian tunnel construction schedule. The proposed construction-related change consisted of altering the proposed construction work hours as well as altering the Van Ness Avenue travel lane closures from partial to full travel lane closures. On February 13, 2015, the planning department analyzed the potential environmental impacts associated with the proposed change to the underground pedestrian tunnel construction and issued an addendum (referred to as the "second addendum").

SUMMARY OF PREVIOUS PROJECT (CPMC LRDP)

As stated above, the previous project analyzed in the FEIR was CPMC's LRDP, a multi-phased plan to meet State seismic safety requirements for its hospitals that included the expansion of medical facilities, creation of a 20-year framework for CPMC's four existing medical campuses (including St. Luke's Campus at Cesar Chavez and Valencia streets) and construction of a new medical campus in San Francisco.¹ The CPMC LRDP included both near-term and long-term projects. Activities proposed at the St. Luke's Campus were all near-term projects that included: (a) street vacation of a portion of San Jose Avenue between Cesar Chavez and 27th streets and construction of a new five-floor, 99-foot-tall, 80-bed, 154,800-gross-square-foot (gsf) St. Luke's Campus Hospital; (b) demolition of the existing St. Luke's hospital tower and construction of a new five-floor, 100-foot-tall, 201,050-gsf St. Luke's Campus Medical Office Building (MOB)/Expansion Building with approximately 220 underground parking spaces in four basement levels on the site of the former (demolished) hospital tower; (c) various streetscape improvements such as new entry plaza, courtyard, pedestrian pathway, and tree plantings; and (d) decommission of the 1957 Building as a licensed hospital for use as an administrative office with storage and conference space. As discussed above, the final approved development at the St. Luke's Campus included 235,690 gsf of total hospital floor area and 120 licensed acute care beds at the proposed St. Luke's Campus Hospital.

MOB/Expansion Building

The MOB/Expansion Building would include medical offices (approximately 31,900 square feet), diagnostic and treatment space (22,500 square feet), lobby space and building infrastructure (15,700 square feet), outpatient care (approximately 8,700 square feet), retail (2,600 square feet), hospital administration (2,000 square feet), cafeteria (1,500 square feet), and education/conference space (1,500 square feet) and four below-ground parking levels that would provide approximately 220 parking

¹ This document, and other documents cited in this addendum, are available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2005.0555E.

spaces (approximately 111,000 square feet). The below-ground parking area would require excavation to a depth of approximately 45 feet below grade, resulting in approximately 42,000 cubic yards of soil removal. The new five-story MOB/Expansion Building would be 100 feet in height, as measured by the Planning Code. Because the lot is sloped and the building would have setbacks and varied heights, the structure would vary in height relative to the location from which it would be viewed.

The MOB/Expansion Building would have two entrances. The Level 1 entrance would be located at the building's northwest corner (near the intersection of San Jose Avenue and Cesar Chavez Street). The Level 2 entrance would be located at the building's southwest corner. A separate access point on Level 1 at the corner of Valencia and Cesar Chavez streets would be provided for retail uses. Vehicular access to the underground parking garage at the MOB/Expansion Building would be available from both Cesar Chavez and Valencia streets. The existing bus stop for the 36-Teresita line, located outside the St. Luke's Hospital on Valencia Street, would be relocated approximately 130 feet south on Valencia Street in front of the 1957 Building. Approximately 10 on-street parking spaces would have to be removed to accommodate both the relocation of the bus stop and the City's proposed Valencia Streetscape Improvement Project. Under the proposed LRDP a staircase would be constructed along the existing right-of-way between the St. Luke's Replacement Hospital and the MOB/Expansion Building to maintain a public pedestrian connection between Cesar Chavez and 27th Streets.

1957 Building

After opening of the new St. Luke's Replacement Hospital, the approximately 31,700-square-foot 1957 Building was planned to be decommissioned from its status as a licensed hospital and used as an administrative office with storage and conference space. The Emergency Department, which is currently located within the 1957 Building, was planned to be relocated to the new St. Luke's Replacement Hospital. The existing Emergency Department entrance at the 1957 Building would no longer be accessible to vehicular access. Underground storage tanks would be located in this area to provide fuel to the emergency generators that would be located on the roof of the St. Luke's Replacement Hospital. There would be no public/patient access to the repurposed 1957 Building, which would be accessible to staff via the circulation path that connects the Montegale Medical Center building, the 1912 Building, and the Duncan Street Parking Garage.

St. Luke's Passenger Drop-Off and Shuttle Stop

Passenger drop-off to the main entrance of the St. Luke's Replacement Hospital would be located along the white-zone drop-off area on Cesar Chavez Street at midblock between Guerrero and Valencia streets. The CPMC shuttle stop for the hospital (currently located at Cesar Chavez Street) would be relocated to the northeast corner of San Jose Avenue and 27th Street with implementation of the LRDP.

FEIR ALTERNATIVE 3A

Several alternatives were analyzed in the FEIR for the St. Luke's Campus. Alternative 3A included demolition of the 1957 Building, along with other buildings, for the construction of a Women's and Children's Center as an addition to the St. Luke's Replacement Hospital. Under Alternative 3A, the MOB/Expansion Building would be constructed in the southeastern portion of the campus, instead of being constructed at the site of the existing St. Luke's Hospital Tower (which was proposed under the

original project). Under this alternative, the MOB/Expansion Building would be five stories, 100 feet tall, and 427,700 square feet in size with seven levels of underground parking.

SUMMARY OF REVISED PROJECT

Since certification of the FEIR and approval of CPMC LRDP in 2013, final design and construction of various hospital components has occurred. During design of the St. Luke's Campus, CPMC has determined that it would be more efficient to demolish the 1957 Building, rather than retain it as proposed under the previous project. The revised project would move the existing uses from the 1957 Building into an enlarged MOB/Expansion Building. Essentially under the revised project, the same amount of square footage from the 1957 Building (31,724 square feet) would be added to the south (rear) side of the MOB/Expansion Building and would be used for the same uses (including medical office and ambulatory surgery) and by the same number of staff that currently use the 1957 Building.

Overall, the revised project would entail demolition of the 1957 Building, expansion of the MOB/Expansion Building by approximately 31,724 square feet, installation of a new "micro" service access, expansion of the white zone drop-off and shuttle service loading areas, and creation of a new pedestrian path between Valencia Street and the drop-off area on 27th Street. The MOB/Expansion Building would be approximately 220 feet along its Valencia Street frontage and approximately 145 feet along its Cesar Chavez Street frontage. The proposed height of the MOB/Expansion Building would remain 100 feet as analyzed under the previous project.²

Additional aspects of the previous project at St. Luke's Campus proposed in the FEIR that would not change substantially under the revised project include the parking garage, bike storage, patient pick-up and drop-off, traffic flow, shuttle service, and public transit. There would be no additional parking created or provided at the MOB/Expansion Building under the revised project; parking for the MOB/Expansion Building would remain at 220 spaces within the parking garage. However, the parking garage would shift south by approximately 85 feet to be located below the footprint of the 1957 Building. Access to the MOB/Expansion Building parking garage from Valencia Street and Cesar Chavez Street would not change. The bicycle storage off of Valencia Street would still occur, but the bicycle access would be shared with the micro service access entry, and bicycle parking would be located adjacent to the micro-dock area on Level 1. Patient pick-up and drop-off at the MOB/Expansion Building would remain on 27th Street at San Jose Avenue, but the white zone drop-off and shuttle service loading area would be lengthened by approximately 100 feet to the south along San Jose Avenue to align with the end of the Hartzell Building, which would be large enough to accommodate two 30-foot-long shuttles at the same time. In addition, the white passenger drop-off zone on Cesar Chavez Street would be lengthened to the east by approximately 100 feet. Traffic flow on Cesar Chavez, 27th and Valencia streets as described in the FEIR would not be permanently altered by the revised project. Similarly, shuttle service and public transit would not be altered. The revised project proposes a new micro service access point to a loading dock for small delivery vans. The micro access point would be located on the east side of the MOB/Expansion Building off of Valencia Street adjacent to the parking garage. This new service access

² The 105-E Height and Bulk District, which includes the site of the MOB/Expansion Building, allows a maximum building height of 105 feet. The "E" bulk designation allows maximum building length of 110 feet and maximum diagonal building dimension of 140 feet for portions of buildings above 65 feet tall.

would require a new 67-foot-wide total curb-cut on Valencia Street, which would also encompass the parking garage exit. The micro service access lane and door-width would be approximately 16 feet wide and the MOB/Expansion Building's door opening for the service access would be 15 feet high.

The main pedestrian access to the MOB/Expansion Building would continue to be located off of Cesar Chavez Street, but would shift around the corner from the north side to the west side of the MOB/Expansion Building. The retail entrance to the MOB/Expansion Building would continue to be located off of Cesar Chavez Street. However, pedestrian access to the MOB/Expansion Building off of Valencia Street would be modified by adding a pedestrian path from the Muni stop on Valencia Street directly west to the drop-off area on 27th Street. This new path would provide pedestrian access to the MOB/Expansion Building from Valencia Street and the passenger drop-off zone. In addition, a secondary pedestrian access would be added to the west and/or south side of the MOB/Expansion Building. Stair access to the 1912 Building, which currently exists at the 1957 Building, would be retained; however, the elevator access to the 1912 Building (from the 1957 Building) would be removed.

The existing City-designated landmark tree, a Moreton Bay fig (*Ficus macrophylla*), which is located in front of the 1957 Building along Valencia Street, would remain as under the previous project. The revised project proposes a 40-foot setback of the MOB/Expansion Building off of Valencia Street which would provide space for the tree. Approximately 11 trees south of the fig tree may need to be removed and replaced as part of the revised project to provide space for the proposed east/west pedestrian connection from Valencia Street to 27th Street. Under the previous project, 35 new trees would be planted around the MOB/Expansion Building and the 1957 Building. The revised project proposes to plant the same number of trees around the enlarged MOB/Expansion Building.

Demolition of 1957 Building

CPMC proposes to demolish the 1957 Building using similar equipment, laydown areas and transportation routes as discussed in the FEIR for the other construction activities at the project site. Due to the demolition of the 1957 Building, the total construction period for the enlarged MOB/Expansion Building would be extended by nine months, from 35 months to 44 months. Demolition of the 1957 Building would involve a similar dismantling and removal process to, and would have overlap with, demolition of the 1970 Building (the existing hospital tower) and would begin six months after beginning demolition of the 1970 Building. Therefore demolition and construction activities would occur on the site at the same time in the same general area and the site disturbance would be for one continuous period.

Construction of Enlarged MOB/Expansion Building

Construction methods and activities for the additional square footage of the MOB/Expansion Building would be similar to the methods and activities described in the FEIR for the MOB/Expansion Building. The number of construction personnel is also anticipated to be similar. Material delivery and off-loading routes, truck trips, types of construction equipment, as well as vehicular or pedestrian access are not anticipated to change. Spoil material would be taken to the same locations as described in the FEIR. The FEIR describes using a mobile crane for steel installation; however, a tower crane may instead be used for construction.

Similar to the previous project, the revised project would require excavation to a depth of approximately 50 feet below grade. The footprint of the excavated area under the revised project would generally be

within the same footprint as the original project with approximately 500 square feet of additional excavation to allow for access and maneuvering of equipment to create the basement floors of the building. The revised project would require 54,634 cubic yards of soil removal, which is an addition of 12,634 cubic yards when compared to the previous project.

Project Approval

No additional project approvals are required from the Planning Commission for the revised project. The floor area ratio exception and Proposition M office allocation finding are not needed because the square footage of the MOB/Expansion Building is not changing by more than the square footage of the existing 1957 Building. A general plan amendment regarding building heights was already obtained during the original entitlement of the MOB/Expansion Building. As the MOB/Expansion Building height would remain the same under the revised project, no additional general plan amendments are necessary.

COMPARISON OF PREVIOUS PROJECT, ALTERNATIVE 3A, AND REVISED PROJECT

A description of the revised project’s components and how they compare to the previous project and Alternative 3A is included below in Table 1. Alternative 3A is included in the comparison because it provided a larger development proposal compared to the previous project and because it included demolition of the 1957 Building.

Table 1. Comparison of the Previous Project, Alternative 3A, and the Revised Project

Project Component	Previous Project	Alternative 3A	Revised Project
MOB/Expansion Building	201,050 gsf with a height of 100 feet and five floors in location of old hospital tower.	427,653 gsf with a height of 100 feet and five floors in location of Duncan Street Parking Garage.	232,774 gsf with a height of 100 feet and five floors in location of old hospital tower.
Parking Garage	220 underground parking spaces on 4 floors. Below-ground parking area would require excavation to a depth of approximately 45 feet below grade (an estimated 42,000 cubic yards of soil would be removed).	487 underground parking spaces on 7 floors. Parking garage would require excavation to a depth of 75 feet below grade (an estimated 105,556 cubic yards of soil would be removed).	Same as previous project, except location of garage moved south to be located below the old 1957 Building footprint. Parking garage would require excavation to 45 feet below grade (an estimated 54,634 cubic yards of soil would be removed).

Project Component	Previous Project	Alternative 3A	Revised Project
Vehicular Access to MOB/Expansion Building	Vehicular access to MOB/Expansion Building would be provided from Cesar Chavez Street and Valencia Street. The curb cut along Valencia and Cesar Chavez Streets would each be 30 feet in width.	Vehicular access to Women’s and Children’s Center would be provided from Cesar Chavez Street and from Valencia Street. Vehicular access to new MOB Parking Garage would be provided from San Jose Avenue, with a curb cut width of 30 feet.	Same as previous project except new micro service access to loading dock for small delivery vans would be added to east side of MOB/Expansion Building adjacent to parking garage access, which would expand the curb cut along Valencia Street to 67 feet in width. The curb cut width along Cesar Chavez Street would remain 30 feet.
Pedestrian Access to MOB/Expansion Building	Main pedestrian access available from Cesar Chavez Street at building’s northwest corner (near current intersection of San Jose Avenue and Cesar Chavez Street). Level 2 entrance would be located at building’s southwest corner. A separate access point on Level 1 at corner of Valencia and Cesar Chavez streets would be provided for retail uses. Bike storage/entrance off Valencia Street.	Pedestrian access to Women’s and Children’s Center off Cesar Chavez Street. Pedestrian access to MOB/Expansion Building off San Jose Avenue.	Main pedestrian access available from Cesar Chavez at west side of building rather than the north side. Level 2 entrance would be at west and/or south side of building. Additional pedestrian access added between Muni stop on Valencia Street directly west to drop-off area on 27th Street. Bike entrance off of Valencia Street (shared with the micro service access), and bike parking would be located adjacent to the micro service access dock area on Level 1.

Project Component	Previous Project	Alternative 3A	Revised Project
Public Transit Access	Existing bus stop for 36-Teresita line, located outside St. Luke’s Hospital on Valencia Street, would have to be relocated to new location, approximately 130 feet south on Valencia Street in front of 1957 Building.	Existing bus stop would remain in current location on Valencia Street.	Same as previous project.
Passenger Drop-off and Shuttle Stop	A 200-foot white-zone drop-off area located along Cesar Chavez Street at midblock between Guerrero and Valencia streets. The CPMC shuttle stop for hospital (currently located at Cesar Chavez Street) would be relocated to northeast corner of San Jose Avenue and 27th Street. A second, smaller white-zone (45-foot) drop off area located adjacent to shuttle stop on San Jose Avenue/ 27th Street.	Patient drop-off area located off Cesar Chavez Street between Replacement Hospital and Women’s and Children’s Center. Shuttle stop would remain on Cesar Chavez Street.	Same as previous project except white zone drop-off along Cesar Chavez would be expanded east by 100 feet and the second white zone drop-off and shuttle stop would be expanded 100 feet south along San Jose Avenue to end of Hartzell Building.
1957 Building	Retained but decommissioned from its status as a licensed hospital and used as an administrative office with storage and conference space.	Demolished along with other buildings and replaced with a Women’s and Children’s Center as an addition to the St. Luke’s Replacement Hospital.	Demolished and square footage added to MOB/Expansion Building and would be used for same uses (including medical office and ambulatory surgery) as existing 1957 Building and with same number of staff.

Project Component	Previous Project	Alternative 3A	Revised Project
1957 Building Access	Existing Emergency Department entrance at the 1957 Building would no longer be accessible to vehicular access. There would be no public/patient access to the repurposed 1957 Building.	Access would be available from Cesar Chavez Street and Valencia Street to new Women’s and Children’s Center.	Elevator access to 1912 Building (from 1957 Building) would be removed. Stair access to 1912 Building, which currently exists at 1957 Building, would be retained.

PURPOSE OF THE ADDENDUM

Section 31.19(c)(1) of the San Francisco Administrative Code states that a modified project must be reevaluated and that, “[i]f, on the basis of such reevaluation, the Environmental Review Officer determines, based on the requirements of the California Environmental Quality Act (CEQA), that no additional environmental review is necessary, this determination and the reasons therefore shall be noted in writing in the case record, and no further evaluation shall be required by this Chapter.” In addition, CEQA section 21166 and CEQA Guidelines sections 15162-15164 provide that when an EIR has been prepared for a project, no subsequent or supplemental EIR shall be required unless one or more of the following events occurs: (1) substantial changes are proposed in the project which will require major revisions of the EIR; (2) substantial changes occur with respect to the circumstances under which the project is being undertaken will require major revisions in the EIR; or (3) new information, which was not known and could not have been known at the time the EIR was certified as complete, becomes available. The lead agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of these conditions has occurred.

Since certification of the FEIR, no changes have occurred in the circumstances under which the CMPC LRDP would be implemented. No new information has emerged that would materially change the analyses or conclusions set forth in the FEIR. Therefore, these issues are not discussed further in the addendum.

This addendum evaluates the potential environmental effects of the revised project from the previous project and Alternative 3A that were analyzed in the FEIR, and applies applicable mitigation measures from the FEIR.

ANALYSIS OF POTENTIAL ENVIRONMENTAL EFFECTS

The FEIR analyzed the environmental effects of implementing the CMPC LRDP project. As shown in the analysis below, the revised project, which is the subject of this addendum, would not result in new environmental impacts, substantially increase the severity of the previously identified environmental impacts, nor require new mitigation measures. Additionally, no new information has emerged that would materially change the analyses or conclusions set forth in the FEIR. Therefore, as discussed in more detail below, the revised project would not change the analysis or conclusions reached in the FEIR.

As stated above, the FEIR analyzed a range of alternatives including Alternative 3A, which considered demolition of the 1957 Building. Public comments requesting a larger St. Luke's Campus resulted in revisions to Alternative 3A. Between the previous project and Alternative 3A, the activities that would occur under the revised project have been analyzed to consider any potential impacts of the revised project.

Land Use and Planning

The FEIR concluded that the proposed development at the St. Luke's Campus under the previous project would result in less-than-significant project-level and cumulative land use impacts. The revised project would not change the character of the project vicinity as the existing uses from the 1957 Building would be transferred to the MOB/Expansion Building. The proposed streetscape improvements would also not change under the revised project. Additional pedestrian access and expanded drop-off zones changes would not conflict with the existing character of the area. The revised project would not physically divide an established community, would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project, and would not have a substantial impact on the existing character of the vicinity. Thus, project-level and cumulative land use impacts of the revised project would be less than significant and no mitigation measures are required.

Aesthetics

The FEIR concluded that the proposed development at St. Luke's Campus would result in less-than-significant project-level and cumulative impacts related to aesthetics.

Under the revised project, the height of the MOB/Expansion Building would not change, though the building would be lengthened by 85 feet along its Valencia Street frontage and reduced in length by 55 feet along its Cesar Chavez Street frontage. The enlarged MOB/Expansion Building would be located within the previously proposed MOB/Expansion Building footprint plus the footprint of the existing 1957 Building after it is demolished. Therefore, the revised MOB/Expansion Building would not be a substantial adverse change on the campus compared to the previous project. Additionally, the revised MOB/Expansion Building would be substantially smaller than the development proposal under Alternative 3A, which was also less than significant. The impact on scenic vistas/views with the development at St. Luke's Campus under Alternative 3A (similar to the previous project) was determined to be less than significant in the FEIR. As under the previous project and Alternative 3A, the revised project would not block any unique views, and the impact on scenic vistas/views with the revised project would be less than significant. The St. Luke's Campus is not located adjacent to or near a state scenic highway; thus, the revised project would not affect related views.

The FEIR concluded that the impact to scenic resources would be less than significant. The MOB/Expansion Building development under the revised project would not substantially alter streetscape improvements, though a few existing trees may need to be removed for the new pedestrian pathway off of Valencia Street. However, this would not affect scenic views along the 49-Mile Scenic Drive. No impacts on unique natural scenic resources would occur under the revised project. The existing City-designated landmark tree, a Moreton Bay fig (*Ficus macrophylla*), which is located in front of the 1957 Building along Valencia Street would remain as described in the FEIR. Therefore, the revised project would not substantially damage scenic resources and would have a less-than-significant impact on scenic

resources. As under the previous project, implementation of Improvement Measure I-BI-N2 to develop a tree protection plan, would also apply to the revised project and would protect the landmark fig tree.

Despite changes to the MOB/Expansion Building length and width, the buildings height, architectural composition, building style, materials and landscape design would not change; thus the revised project would result in a minimal difference in the visual effect compared to the previous project. Additionally, the demolition of the 1957 Building would not cause a substantial adverse impact on the visual environment because only a portion of the existing facade is visible from Valencia Street, as much of the building is currently obscured by trees. There are no unique architecture features on the 1957 Building that would be lost with its demolition. The main element of the building visible from Valencia Street, the existing brick retaining wall between the 1912 Building and the 1957 Building, would remain in place under the revised project. Thus, similar to the previous project and Alternative 3A, the revised project would have a less than significant impact on visual character and visual quality.

Lighting of the enlarged MOB/Expansion Building would be similar to the previous project, and would not result in a substantial increase in ambient lighting on the campus. Lighting for the new facilities would be installed and operated in compliance with the City's Lighting Guidelines and the California Building Standards Code (Title 24). Therefore, similar to the previous project, the impact regarding light and glare would be less than significant for the revised project.

Overall, project-level and cumulative impacts for the revised project related to aesthetics would remain less than significant and no mitigation measures are required.

Cultural Resources

The FEIR concluded that the proposed development at St. Luke's Campus under the previous project would result in less-than-significant project-level and cumulative impacts related to cultural resources with Mitigation Measures M-CP-N2, M-CP-N3, and M-CP-N4, which require archeological testing, monitoring, data recovery programs, procedures if human remains are discovered, and construction worker training regarding paleontological resources.

The FEIR concluded that the impact of the proposed development at St. Luke's Campus related to historical resources would be less than significant in part because the buildings proposed for demolition were determined not to be historical resources and because construction of the MOB/Expansion Building would not further degrade the historic setting of the adjacent 1912 Building.³ As stated in the FEIR, a historic evaluation report was prepared for the St. Luke's Campus which determined that the 1957 Building does not meet state or local criteria for individual historical significance and is not eligible for listing in the California Register of Historic Places.^{4,5} Therefore, the revised project would not result in the demolition of a historic resource and the proposed enlargement of the MOB/Expansion Building

³ The 1912 Building appears eligible for listing on the California Register of Historic Resources; however, the setting of the 1912 Building has been previously altered by the addition of new buildings at the St. Luke's Campus.

⁴ California Pacific Medical Center, *Historic Evaluation Report for St. Luke's Campus: California Pacific Medical Center*, May 2009.

⁵ San Francisco Planning Department, *Historic Resource Evaluation Response: St. Luke's Campus, California Pacific Medical Center*, May 26, 2009.

would not degrade the historic setting of the 1912 Building. There is a marker with a bronze plaque on Valencia Street, just east of the 1957 Building, for California Registered Historical Landmark No. 791 indicating that the Bancroft Library building was once located at this site before being demolished in 1956. The plaque of the historic library that was on the site originally would remain in place and would not be impacted by the revised project. Therefore, the revised project would have a less than significant impact on historic architectural resources, similar to the previous project and Alternative 3A.

The FEIR concluded that the impacts at St. Luke's Campus under the previous project related to archaeological resources, paleontological resources, and human remains would be less than significant with implementation of Mitigation Measures M-CP-N2, M-CP-N3, and M-CP-N4. Below-grade levels for the MOB/Expansion Building parking garage under the revised project would require excavation in locations where prehistoric and historic archeological resources may be located. The Colma Formation, which underlies all CPMC campuses, is considered a paleontologically sensitive rock formation because of its potential to contain unique paleontological resources, which could be disturbed during excavation activities. Although no human remains have been listed or recorded at this campus, excavation related to the MOB/Expansion Building under the revised project could disturb as-yet undiscovered human remains.

The MOB/Expansion Building under the revised project would require approximately 12,634 cubic yards of additional excavation than the previous project. Alternative 3A required a greater amount of excavation than either the previous project or the revised project. The FEIR concluded that implementation of Mitigation Measures M-CP-N2, M-CP-N3, and M-CP-N4 would reduce impacts to archeological resources, paleontological resources, and human remains to a less than significant level for the previous project and Alternative 3A. FEIR Mitigation Measures M-CP-N2, M-CP-N3, and M-CP-N4 would apply to the revised project and would reduce impacts to a less than significant level.

Transportation and Circulation

The FEIR concluded that the proposed development at St. Luke's Campus would result in less than significant project-level and cumulative impacts related to transportation and circulation. Since the same square footage, staff, and uses from the 1957 Building would be relocated into the enlarged MOB/Expansion Building, the revised project would not result in an increase in vehicle, bicycle, transit, or pedestrian trips, would not increase loading demand, and would not change emergency access. As previously discussed, the revised project would include the following project changes: the previously approved 45-foot-long patient pick-up/drop-off area on 27th Street would be extended by 100 feet along San Jose Avenue to provide a loading/shuttle service zone that could accommodate two 30-foot-long shuttle vans/buses at the same time; the previously approved 200-foot-long passenger loading zone on Cesar Chavez Street would be extended by 100 feet to the east; the installation of a new a micro service access off of Valencia Street; and the creation of a new pedestrian path on the project site that connects Valencia Street to 27th Street.⁶ Since these changes would improve site circulation at St. Luke's Campus, impacts to traffic, transit, bicycles, pedestrians, loading, and emergency vehicle access impacts would be less than significant for the revised project, and no mitigation measures are required.

⁶ The revised project would not change the number of parking spaces provided at the MOB/Expansion Building.

Under the previous project, there would be five loading spaces in the new replacement hospital, which would accommodate the anticipated five peak hour loading spaces for the LRDP at St. Luke's Campus. The revised project would not generate additional loading demand since there would be no new square footage, staff, or uses under the revised project. The revised project includes a new micro service access off of Valencia Street, which would provide access primarily for vans and delivery trucks (UPS, FedEx, etc.).⁷ The micro service access would share a 67-foot-wide curb cut with the adjacent garage/drop-off access lanes. The micro service access would be approximately 16 feet in width with a door opening of approximately 15 feet high. In addition, the revised project would include an exterior door that would enter into a dedicated bicycle room that is adjacent but separate from the loading/delivery activities.

As under the previous project, implementation of the truck management plan at the St. Luke's Campus would restrict the length of incoming trucks to 35 feet in length and would specify that all truck maneuvering would be within the loading dock, without blocking the sidewalk or parking lanes on Cesar Chavez Street. Under the revised project, the truck management plan would be revised to include restrictions on trucks or delivery vans from blocking the sidewalk or parking on Valencia Street due to the new micro service access.

Due to the demolition of the 1957 Building and construction of an enlarged MOB/Expansion Building, construction activities for the revised project would require an additional nine months when compared to the previous project. Construction activities for the revised project would be substantially less (approximately 48 fewer months) than what was analyzed in the FEIR for Alternative 3A, which was found to be less than significant. Similar to the previous project and Alternative 3A, construction of the revised project would not substantially affect traffic, transit, pedestrian, and bicycle circulation, and therefore, construction impacts would be less than significant and no mitigation measures are required.

Noise

The FEIR concluded that the proposed development under the previous project would result in less-than-significant project-level impacts related to operational noise and future traffic-related interior noise levels. The FEIR found less-than-significant with mitigation impacts related to short-term construction and demolition noise and operation of stationary noise sources. The FEIR concluded that a significant and unavoidable impact would result from groundborne vibration due to construction. Since the revised project would not result in increased traffic, impacts related to operational traffic noise and future traffic-related interior noise levels would be less than significant.

The FEIR determined that construction activities at the St. Luke's Campus would not comply with the San Francisco Noise Control Ordinance, but determined construction of the MOB/Expansion Building would be less than significant with implementation of Mitigation Measure M-NO-N1 (equipment requirements, community liaison, and construction noise management plan). Under the revised project, development at the St. Luke's Campus would be slightly greater than the previous project, but less than the development scenario for Alternative 3A in the FEIR. Construction activities would expose sensitive receptors to increased noise levels on the campus and in the existing residential neighborhood adjacent to the campus. Construction activities would occur over an additional nine months under the revised project than under the previous project, but for 48 fewer months than was analyzed for Alternative 3A.

⁷ The micro service access would also provide an area for trash/recycling receptacles.

Similar to the previous project and Alternative 3A, Mitigation Measure M-NO-N1 would apply to the revised project to reduce this significant impact to a less-than-significant level.

The FEIR indicated that the operation of proposed stationary sources—specifically, rooftop heating, ventilation, and air conditioning (HVAC) equipment—at the St. Luke’s Campus under the previous project could potentially generate noise levels that exceed the Noise Ordinance and result in a substantial increase in ambient noise levels. However, the FEIR concluded that implementation of Mitigation Measure M-NO-N3 (noise measurement of operating exterior equipment) would reduce this impact to a less-than-significant level. Noise sources such as HVAC equipment, parking garage activities, patient drop-offs, loading dock and delivery activities, and waste disposal activities would be similar to the previous project but at slightly elevated levels because of the additional micro service access off of Valencia Street and slightly larger MOB/Expansion Building proposed for the revised project. Similar to the previous project and Alternative 3A, Mitigation Measure M-NO-N3 would apply to the revised project and would reduce the significant impact from stationary noise sources to a less than significant level.

The FEIR concluded that, depending on the individual land use type, predicted levels of groundborne noise and vibration attributable to construction activities at the St. Luke's Campus may exceed the Federal Transit Administration’s (FTA’s) standard for human response at nearby off-site vibration-sensitive uses, and this impact would remain significant and unavoidable even with implementation of Mitigation Measure M-NO-N5, which includes equipment requirements, a community liaison, and a construction vibration management plan. Construction and demolition activities under the revised project could temporarily result in construction-generated vibration that could exceed applicable thresholds of significance, similar to the previous project, but for nine additional months because of the increased construction and demolition activities. However, the duration would be less than under Alternative 3A, which would involve a substantially longer construction period. Due to the potential impacts, Mitigation Measure M-NO-5 would also apply to the revised project. As under the previous project and Alternative 3A, this impact would remain significant and unavoidable after implementation of Mitigation Measure M-NO-N5 for the revised project.

Air Quality

The FEIR concluded that construction of the previous project and Alternative 3A would result in less-than-significant impacts related to exposure of sensitive receptors to substantial concentrations of toxic air contaminants (TACs) (1999 BAAQMD criteria), less-than-significant with mitigation impacts related to fugitive dust (1999 and 2010 BAAQMD criteria), and significant and unavoidable with mitigation impacts regarding emissions of diesel particulate matter and exposure of sensitive receptors to substantial concentrations of TACs (2010 BAAQMD criteria), as well as construction-emissions of NOx (2010 BAAQMD criteria).

The FEIR concluded that operation of the previous project or Alternative 3A would result in less-than-significant impacts related to local concentrations of carbon monoxide (CO) from motor vehicle exhaust (1999 BAAQMD criteria), exposure of sensitive receptors to substantial concentrations of TACs (1999 and 2010 BAAQMD criteria), and exposure of a substantial number of people to objectionable odors (1999 and 2010 BAAQMD criteria). Operation of the previous project and Alternative 3A would result in significant and unavoidable impacts related to exceedance of applicable criteria pollutant threshold for particulate

matter with an aerodynamic resistance diameter of 10 micrometers or less (i.e., PM10) under the 1999 and 2010 BAAQMD criteria.

The total area of new construction under the revised project would be increased by 31,724 square feet compared to the previous project due to the demolition of the 1957 Building and the enlargement of the MOB/Expansion Building. When compared to Alternative 3A, the construction area for the revised project would be less. Therefore, the revised project would result in similar construction-related air quality impacts as the previous project, including a less than significant with mitigation impact on fugitive dust, less than significant impact on exposure to TACs (1999 BAAQMD criteria), and significant and unavoidable impacts (with mitigation) related to NO_x and diesel particulate matter emissions and exposure of sensitive receptors to substantial concentrations of TACs (2010 BAAQMD criteria). FEIR Mitigation Measures M-AQ-N1a (implement BAAQMD basic and optional control measures and additional construction mitigation measures), M-AQ-N1b (implement equipment exhaust control measures), M-AQ-N9 (implement control measures and equipment requirements), and M-AQ-N10a (implement accelerated emission control device for construction equipment) would be required for the revised project, similar to the previous project and Alternative 3A.

Compared to the previous project, the revised project would generate similar quantities of new operational emissions from mobile and stationary sources, and therefore, the revised project would result in similar operations-related air quality impacts as the previous project, including less-than-significant impacts related to local concentrations of carbon monoxide (CO) from motor vehicle exhaust (1999 BAAQMD criteria) and exposure of sensitive receptors to substantial concentrations of TACs (1999 and 2010 BAAQMD criteria), and significant and unavoidable impacts related to PM10 emissions.

As discussed in the FEIR, compliance with industry-standard waste disposal methods and BAAQMD Regulation 7 (Odorous Substances) would limit potential odor exposure. Therefore, the revised project would not expose a substantial number of people to objectionable odors, and impacts related to odor exposure would be less than significant.

Greenhouse Gas Emissions

Because greenhouse gas (GHG) emissions impacts are cumulative global impacts, rather than localized in nature, the FEIR analyzed GHG emissions impacts of the previous project based upon the total aggregated emissions from all CPMC campuses; the FEIR did not include campus-specific analyses. The FEIR concluded that the previous project would result in less than significant impacts regarding construction and operational GHG emissions under the CEQA Guidelines and less than significant impacts related to construction GHG emissions under the Bay Area Air Quality Management District (BAAQMD) 2010 Guidelines. The FEIR concluded that a significant and unavoidable impact would occur related to operational emissions under the BAAQMD 2010 Guidelines.

The revised project would generate similar GHG emissions compared to the previous project and Alternative 3A, and would be required to comply with applicable City regulations and ordinances that reduce the project's construction-related contribution to GHG emissions, including, but not limited to, the San Francisco Greenhouse Gas Reduction Ordinance, the San Francisco Greenhouse Gas Reduction Strategy, San Francisco Green Building Requirements, the Transit First Policy, and the San Francisco Mandatory Recycling and Composting Ordinance. In addition, the revised project would implement BAAQMD-recommended best management practices (BMPs), would comply with the Dust and

Demolition Debris Recovery Ordinance, and would implement Leadership in Energy and Environmental Design measures related to reducing construction-related GHG emissions. Therefore, similar to the previous project, construction and operation for the revised project would result in a less than significant impact regarding GHG emissions under the CEQA Guidelines and would not conflict with a plan, policy, or regulation developed for the purpose of reducing GHG emissions. In addition, similar to the previous project, the revised project would result in a less-than-significant impact for construction-related GHG emissions under the BAAQMD 2010 significance criteria. The revised project would comply with San Francisco's BAAQMD-approved Qualified GHG Reduction Strategy. However, the revised project would exceed the BAAQMD's adopted GHG efficiency criterion for project-level analysis, as discussed in the FEIR. Therefore, similar to the previous project, the impact of the revised project on operational GHG emissions would be significant and unavoidable. The FEIR concluded that no mitigation would be required for the previous project because it would comply with the Qualified GHG Reduction Strategy. Similarly, because the revised project would be compliant with the BAAQMD-approved Qualified GHG Reduction Strategy, no mitigation is required.

Wind and Shadow

Based on the exposure, massing, and orientation of the buildings proposed for the St. Luke's Campus under the previous project, the FEIR determined that no substantial adverse changes to the wind environment would occur in pedestrian areas adjacent to or near the campus. Therefore, the FEIR determined that this impact would be less than significant. The St. Luke's Campus is sheltered from northwesterly and westerly winds by existing upwind three- and four-story structures. Additionally, the terrain in the immediate vicinity of the St. Luke's Campus slopes upward to the north and west of the campus, with Guerrero and Dolores streets located upslope, which increases the sheltering effects of existing off-site upwind structures. Under the revised project, the MOB/Expansion Building would remain at the same height and would occupy the same footprint as under the previous project plus the 1957 Building footprint. The revised MOB/Expansion Building would not extend south past the replacement hospital building. The revised MOB/Expansion Building would be of similar height as the previous project and would also be sheltered by the St. Luke's Replacement Hospital building. Therefore, similar to the previous project, the enlarged MOB/Expansion Building would intercept and deflect less wind to street level than the existing hospital tower, which is located immediately adjacent to the west. Therefore, like the previous project, the revised project would result in a reduction in wind conditions relative to existing wind conditions at the St. Luke's Campus. The additional pedestrian access from Valencia Street to 27th Street is not expected to result in substantial changes to the wind environment. Therefore, as under the previous project and Alternative 3A, impacts related to wind would be less than significant under the revised project.

The FEIR determined that parks or open space subject to Planning Code section 295⁸ or other public or publically accessible open space would not be shadowed by the proposed development at the St. Luke's Campus. The FEIR found that the previous project would have a less-than-significant shadow impact.

⁸ Section 295 of the Planning Code, the Sunlight Ordinance, generally prohibits the issuance of building permits for structures greater than 40 feet that would cast new shadows on open spaces under the jurisdiction of (or designated for acquisition by) the San Francisco Recreation and Park Commission, and that would have a significant adverse impact on the use of such spaces from 1 hour after sunrise until 1 hour before sunset.

Under the revised project, the height of the MOB/Expansion Building would remain the same, though the building would be lengthened by 85 feet along Valencia Street and reduced by 55 feet along Cesar Chavez Street. Any net new shadows in the vicinity of the campus would not affect open space protected by section 295 or other recreational spaces. These net new shadows would fall on the sidewalks of Valencia Street, Cesar Chavez Street, and San Jose Avenue. However, net new shadow would not exceed levels that are commonly expected in highly urban areas. Therefore, the FEIR found that the proposed development at St. Luke's Campus is not expected to create net new shadows on park or open space subject to section 295, any publicly accessible private open space, any outdoor recreational facility, or any other public area. Similar to the previous project and Alternative 3A, the revised project would have a less-than-significant shadow impact and no mitigation measures are required.

Biological Resources

The FEIR concluded that the previous project would result in less than significant impacts with mitigation related to nesting birds and vegetation clearing, and less than significant impacts related to protected trees.

As analyzed in the FEIR, construction activity for the revised project could affect onsite trees, including the landmark fig tree that is located near the 1957 Building. As under the previous project, the landmark fig tree would remain in place and would not be removed under the revised project. Therefore, similar to the previous project, impacts of the revised project on protected trees would be less than significant. Improvement Measure I-BI-N2 (development of a tree protection plan) would also be implemented as part of the revised project, which would further reduce the less-than-significant impact to protected trees. Similar to the previous project, perimeter trees could also be affected by construction activities. Any birds nesting in affected trees could be disturbed by construction activities which would result in a significant impact on nesting birds. The FEIR found that with implementation of Mitigation Measure M-BI-N1 (conducting preconstruction nesting bird surveys), the impact on nesting birds would be reduced to a less-than-significant level. Mitigation Measure M-BI-N1 would apply to the revised project.

The FEIR concluded that the previous project at St. Luke's Campus would comply with the City's Urban Forestry Ordinance; therefore, potential impacts to protected trees would be less than significant under the previous project. To comply with this ordinance, CPMC would submit a tree protection plan to Public Works and implement a plan for trees that could be affected by construction. As under the previous project, CPMC would obtain a permit for tree removal from Public Works, consistent with Article 16, "Urban Forestry Ordinance," of the San Francisco Public Works Code. In addition, pursuant to section 806 of the San Francisco Public Works Code, CPMC would have to ensure that an appropriate replacement tree for each street tree removed would be planted on the project site or along the street, or would have to pay an in-lieu fee. Similar to the previous project, the revised project would be required to implement a tree protection plan and would be required to comply with the Urban Forestry Ordinance, which would reduce impacts on street and significant trees to a less-than-significant level. No mitigation measures would be required.

Geology and Soils

The FEIR concluded that the previous project would result in less-than-significant impacts related to earthquake faults, ground shaking, ground failure, liquefaction, landslides, expansive or corrosive soils, septic tanks/alternative wastewater disposal systems, changes to topography or any unique or physical

features of the site, and cumulative impacts. The FEIR concluded that Mitigation Measures M-GE-N4 (implement a storm water pollution prevention plan) and M-GE-N6 (include an excavation and dewatering program in the geotechnical report) would be required to reduce impacts to a less-than-significant impact regarding erosion and subsidence.

The FEIR concluded that the potential for fault rupture at the St. Luke's Campus site is low, and new earthquake fault zones are unlikely to be designated in the near future. Similar to the previous project, the revised project would comply with applicable seismic standards and impacts related to ground shaking would be less than significant.

The St. Luke's Campus is underlain by medium-dense clayey and silty sand that is liquefiable; liquefaction-induced settlement could occur in this area during a major earthquake on a nearby fault.⁹ The loose to medium-dense sand and gravel above and below the groundwater level at the MOB/Expansion Building would be removed in its entirety and/or replaced with engineered fill, as under the previous project, but to a greater extent because it would also include the area within the 1957 Building footprint. As under the previous project and Alternative 3A, with implementation of this design feature, impacts related to liquefaction, lateral spreading, and densification/seismic settlement would be less than significant for the revised project.

The FEIR determined that foundation methods proposed for all structures at the St. Luke's Campus would be consistent with the site-specific recommendations for footings, mats, lateral loads and pressures, piers, piles, floor slabs, underdrains, and subgrade elevations determined by the subsurface materials and groundwater elevations. Therefore, the FEIR concluded that the impact related to seismic landslides would be less than significant. The St. Luke's Campus has no evidence of past or ongoing landslide activity and the foundation methods for the MOB/Expansion Building would not change under the revised project (mat slab on the bearing layer). The Department of Building Inspection would review building permits submitted for the revised project to ensure compliance with the California Building Code, which sets forth requirements for seismic safety in all buildings. Therefore, impacts related to seismic and a seismically induced landslide would also be less than significant for the revised project.

The FEIR determined that without proper controls, construction activities could expose loose soils to both wind and water erosion. The FEIR concluded that implementation of Mitigation Measure M-GE-N4 would reduce this impact to a less-than-significant level. The MOB/Expansion Building proposed under the revised project would be constructed on a site that is already developed, though construction-related activities such as excavation could result in erosion and loss of topsoil resulting in a significant impact. Mitigation Measure M-GE-N4 would also apply to the revised project to reduce impacts from erosion or loss of topsoil to a less-than-significant level.

Subsurface materials in the area of the MOB/Expansion Building to a depth of 16 feet below ground surface would be susceptible to seismic settlement. However, excavation for the MOB/Expansion Building would extend below the bottom of the liquefiable layer to a depth of 50 feet below ground surface as part of the revised project. Similar to the previous project, the potential for effects on liquefiable

⁹ Treadwell & Rollo, 2010 *Geology and Geotechnical Input for Environmental Impact Report, Medical Office Building, St. Luke's Replacement Hospital, San Francisco, CA.*

soil would be removed during site excavation and this impact would be less than significant for the revised project.

The FEIR determined that under the previous project, dewatering had the potential to result in ground subsidence at the MOB/Expansion Building and utility routes sites and at adjacent streets and properties as overlying soil loses support from the volume of the water. The FEIR determined that implementation of Mitigation Measure M-GE-N6 would reduce the impact related to subsidence to a less-than-significant level. Excavation activities during construction for the revised project could encounter groundwater at the site of the enlarged MOB/Expansion Building, which would require dewatering. Similar to the revised project, implementation of Mitigation Measure M-GE-N6 would require a design-level geotechnical report for the project to include an excavation and dewatering program. As required by Mitigation Measure M-GE-N6, the program shall require monitoring for settlement and groundwater drawdown and shall include response measures to prevent settlement or drawdown if it is observed. Implementation of Mitigation Measure M-GE-N6 would reduce potential subsidence impacts of dewatering to a less-than-significant level for the revised project.

The FEIR concluded that construction of the St. Luke's Campus under the previous project would not affect the probability of soil expansion or the corrosivity of soils at the campus sites and, therefore, this impact was determined to be less than significant. The soils at the project site are considered "moderately corrosive" to "mildly corrosive." The clayey fill and topsoil might also be expansive, specifically within the northernmost one-third of the campus, where the MOB/Expansion Building would be constructed under both the previous project and the revised project. Similar to the previous project, impacts from the revised project related to expansive soil would be less than significant because the excavation area for the enlarged MOB/Expansion Building would extend below the expansive soils. Furthermore, as part of standard engineering practices, all reinforced concrete and buried metallic piping would be properly protected against corrosion as required by the building code.

The St. Luke's Campus is connected to the municipal sewer system and would remain connected under the revised project; no septic tanks would be required. As under the previous project, the impact regarding soils and septic tanks/alternative wastewater disposal systems would be less than significant for the revised project.

The FEIR determined that, although the amount of native soil and rock removed for below-grade excavation would be substantial, the change in topography would be entirely below grade and no unique geologic features, such as rock outcroppings and notable hills, are present at the project site. Therefore, the FEIR concluded that the impact to topography or unique geologic or physical features would be less than significant. Excavation, grading, and construction of the enlarged MOB/Expansion Building would require an additional 12,634 cubic yards of excavation; however, the revised project would not change the grade of the surrounding area and would be less than significant.

Hydrology and Water Quality

The FEIR concluded that the proposed development under the previous project would result in less-than-significant impacts related to groundwater, dewatering, stormwater quality, flooding and inundation, and less-than-significant with mitigation impacts related to changes in runoff.

Impervious surfaces at the project site for the revised project would be substantially similar to the previous project because the development footprint, including the 1957 Building footprint, would be substantially the same. Therefore, impacts related to groundwater, dewatering, runoff (quantity and quality), stormwater quality, flooding and inundation would be the similar for the revised project compared to the previous project. Mitigation Measures M-HY-N2 (implementation of a stormwater control plan) and M-HY-N3 (implementation of a storm water pollution prevention plan) would apply to the revised project in order to reduce runoff impacts to a less than significant level. Under the revised project, project-level and cumulative hydrology and water quality impacts would be less than significant with mitigation.

Hazards and Hazardous Materials

The FEIR concluded that the previous project would result in less-than-significant impacts regarding the release of hazardous materials during operations, hazardous emissions, airport hazards, emergency response or evacuation plan conflicts, loss from fires, and cumulative impacts. The FEIR concluded that the previous project would result in less-than-significant impacts with mitigation regarding the transport of hazardous materials and construction on a hazardous site.¹⁰

Emergency operations and evacuation plans would continue to be maintained for on-site employees, patients, and visitors during construction, and existing routes and procedures would be maintained. The enlarged MOB/Expansion Building under the revised project would be built to San Francisco Fire Code standards, which would help to minimize demand for future fire protection services. Therefore, as under the previous project and Alternative 3A, impacts related to conflicts with emergency response or evacuation plans, and impact due to significant risk of loss, injury, or death involving fires would be less than significant for the revised project.

The FEIR determined that implementation of Mitigation Measures M-HZ-N1a (prepare a site mitigation plan) and M-HZ-N1b (prepare an unknown contingency plan), would reduce impacts related to known soil and groundwater contamination to a less-than-significant level. As for the previous project, removal of the underground storage tanks (USTs) at the location of the new MOB/Expansion Building under the revised project would be required as part of excavation activities. Removal of the USTs could expose workers to contaminants during tank removal activities, and this impact would be potentially significant. Similar to the previous project and Alternative 3A, previously unidentified contaminated soil or groundwater could be encountered during construction activities for the MOB/Expansion Building, resulting in a potentially significant impact. As under the previous project and Alternative 3A, Mitigation Measures M-HZ-N1a and M-HZ-N1b would apply to the revised project, which would reduce impacts to a less-than-significant level. Under the revised project, the 1957 Building, which contains asbestos-containing materials and lead-based paint, as well as potentially PCBs and fluorescent lights containing mercury vapor, would be demolished. Existing federal, state, and local regulations pertaining to inspection and abatement of these materials would ensure impacts related to demolition of buildings containing hazardous building materials would be less than significant. In addition, as under the previous project, improvement measure I-HZ-1 would further reduce the potential for exposure to PCBs

¹⁰ The St. Luke's Campus is not located within an airport land use plan or within two miles of a public airport or public-use airport or private airstrip.

and mercury by requiring the removal and disposal of potentially contaminated equipment prior to the start of construction. Therefore, construction under the revised project would result in less-than-significant impacts related to the transport, use, and disposal of hazardous materials during project construction.

The FEIR determined that impacts from accidental release of hazardous materials during operations would be less than significant. As stated in the FEIR, hazardous materials brought on-site during construction would be managed in accordance with federal, state, and local regulations. Hazardous materials storage would be managed under the oversight of San Francisco Department of Public Health's Hazardous Materials and Waste Program, and through compliance with applicable regulations. Therefore, the potential for hazardous-materials emergencies and potential effects on sensitive receptors from St. Luke's Campus operations would be less than significant under the revised project.

The FEIR stated that implementation of applicable regulations and standards would ensure that hazardous air emissions from structures to be demolished would be minimized, implementation of dust control measures in accordance with the City's Dust Control Ordinance would result in a low potential for contaminated dust to become airborne during construction, and hazardous materials handled on-campus during construction and operations would be managed in accordance with federal, state, and local regulations. Since the same regulations and standards would apply to the revised project, impacts would also be less than significant for the revised project.

The FEIR determined that the potential to encounter USTs during construction would exist during construction at the St. Luke's Campus. The FEIR concluded that implementation of Mitigation Measures M-HZ-N4e and M-HZ-N4f would reduce impacts related to known soil and groundwater conditions to a less-than-significant level under the previous project and Alternative 3A. The St. Luke's Campus is included in various hazardous materials databases, but the inclusion of this campus does not indicate substantial hazardous materials effects; rather, inclusion in databases indicates that activities at the site involve the use and storage of hazardous materials. Mitigation Measures M-HZ-N4e and M-HZ-N4f would apply to the revised project and would reduce this impact to a less-than-significant level.

Other Environmental Topics

The FEIR found the previous project would have less-than-significant impacts related to population, employment and housing; utilities and service systems; recreation; public services; mineral and energy resources; agricultural and forest resources, and growth inducement. Because the activities proposed under the revised project are similar to the approved previous project, and because the revised project would not result in additional net square footage or staff at the St. Luke's Campus, these topics would not be affected and are therefore not discussed further. Therefore, the revised project would not change the analysis or conclusions reached in the FEIR and the impacts on these other environmental topics would remain less than significant.

CONCLUSION

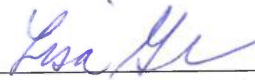
Based on the foregoing, it is concluded that the analyses conducted and the conclusions reached in the FEIR certified on April 26, 2012 remain valid. The proposed revisions to the project would not cause new significant impacts not identified in the FEIR, and no new mitigation measures would be necessary to reduce significant impacts. No changes have occurred with respect to circumstances surrounding the

proposed project that would cause significant environmental impacts to which the project would contribute considerably, and no new information has become available that shows that the project would cause significant environmental impacts. Therefore, no supplemental environmental review is required beyond this addendum.

Date of Determination:

I do hereby certify that the above determination has been made pursuant to State and Local requirements.

9/20/17



Lisa Gibson
Environmental Review Officer

cc: Vahram Massehian, Project Sponsor
Elizabeth Watty, Current Planning

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