



SAN FRANCISCO PLANNING DEPARTMENT

Final Community Plan Mitigated Negative Declaration

PMND Date: June 14, 2017
Case No.: 2016-000346ENV
Project Title: Illinois and 20th Streets/Pier 70 ("20th Street Historic Core")
Zoning: M-2 (Heavy Industrial) Use District
40-X and 65-X Height and Bulk District
Block/Lot: 4046/001, 4111/003, 4111/004, and portions of 4052/001
Lot Size: 65 Acres
Plan Area: Eastern Neighborhoods (Central Waterfront)
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PROJECT DESCRIPTION:

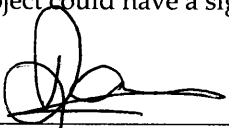
The project site is located along the northern and southern portions of 20th Street between Illinois and Louisiana streets within the greater approximately 70-acre Pier 70 in the Central Waterfront area. The project site includes four parcels which contain 12 Port-owned buildings. Ten of those buildings (Buildings 14, 101, 102, 104, 113, 114, 115, 116, 122, and 123) constitute the "20th Street Historic Core," and the proposed project would involve the rehabilitation and renovation of these buildings to accommodate new office, commercial, and light industrial uses. The proposed project includes the demolition of two vacant buildings that are located outside of the 20th Street Historic Core: an approximately 8,400-square-foot office building (Building 40) and an approximately 31,500-square-foot warehouse building (Building 117). The proposed project includes the addition of approximately 69,000-gross-square-feet of new building space, primarily in interior mezzanines, plus the construction of a two-story mixed-use, 9,000-square-foot addition adjacent to Building 101. In total, the project would include approximately 340,000 gross square feet (gsf) of building space (consisting of approximately 224,000 gsf of Production, Distribution, and Repair (PDR)/light industrial space, 100,000 gsf of office space, and 16,000 gsf of retail space). The proposed project would also create a new approximately 42,000-square-foot outdoor publicly-accessible plaza to be used for events. The proposed project would include remediation of hazardous materials as encountered and consistent with the Port's Feasibility Study and Remedial Action Plan.

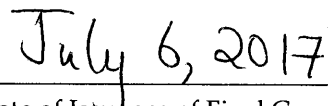
Construction of the proposed project would take approximately 18 to 24 months. Excavation would be required to a maximum depth of approximately four feet below the ground surface for construction of the addition adjacent to Building 101, which would result in the removal of approximately 100 cubic yards of soil. The proposed addition would be supported by a shallow building foundation. Foundation work associated with tenant improvement renovation could include micropiles. Impact piling driving is not proposed or required.

FINDING:

This project could not have a significant effect on the environment. This finding is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15064 (Determining Significant Effect), 15065 (Mandatory Findings of Significance), 15070 (Decision to prepare a Negative Declaration), and 15183 (Projects Consistent with a Community Plan or Zoning), and the following reasons as documented in the initial study – community plan evaluation for the project, which is attached. Mitigation measures are included in this project to avoid potentially significant effects. See pages 72-82.

In the independent judgment of the Planning Department, there is no substantial evidence that the project could have a significant effect on the environment.


for _____
Lisa Gibson
Environmental Review Officer



Date of Issuance of Final Community
Plan Mitigated Negative Declaration

cc: James Madsen, Project Sponsor; Phil Williamson, Port; M.D.F.

Initial Study – Community Plan Evaluation
Illinois and 20th Streets/Pier 70 ("20th Street Historic Core")
Planning Department Case No. 2016-000346ENV

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Initial Study – Community Plan Evaluation

Illinois and 20th Streets/Pier 70 (“20th Street Historic Core”)

Planning Department Case No. 2016-000346ENV

A. PROJECT DESCRIPTION

Project Overview

The project site is located along northern and southern portions of 20th Street between Illinois and Louisiana streets within the greater approximately 70-acre Pier 70 area bounded by Mariposa, Illinois, and 22nd streets and the San Francisco Bay in San Francisco’s Central Waterfront area in the Potrero Hill neighborhood. The site is within the Heavy Industrial Use (M-2) Zoning District and the 40-X and 65-X Height and Bulk District. **Figure 1** (page 3) shows the location of the project.

The project site includes four parcels (Block 4046, Lot 001; Block 4111, Lots 003 and 004; and portions of Block 4052, Lot 001) which contain 12 Port-owned buildings. Ten of those buildings—Buildings 14, 101, 102, 104, 113, 114, 115, 116, 122, and 123¹—constitute the “20th Street Historic Core,” and would be rehabilitated to accommodate new uses. **Figure 2** (page 4) shows the site plan for the proposed project. A new, two-story building to the north of, and adjacent to, Building 101 would be constructed (see **Figure 3**, page 5). Buildings 40 and 117 are outside of the 20th Street Historic Core and would be demolished. The 12 buildings on the project site range in size from approximately 700 to 95,200 square feet (sf).

Previous Environmental Review

On May 7, 2014, the Planning Department issued a Certificate of Determination: Exemption From Environmental Review (Case No. 2013.1168E) for the Pier 70: 20th Street Historic Core Project based upon Public Resources Code Section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183. The 2014 determination evaluated the potential project-specific environmental effects of the 20th Street Project in light of the Eastern Neighborhoods Rezoning and Area Plans Final Environmental Impact Report (Eastern Neighborhoods PEIR), and concluded that the proposed project would not result in new, significant environmental effects, or effects of greater severity than were already analyzed and disclosed in the Eastern Neighborhoods PEIR. The 2014 determination analyzed the impacts of the rehabilitation and reuse of the 20th Street Historic Core buildings, including the use of approximately 69,000 sf of new space that would be developed in some of the buildings, primarily through the creation of interior mezzanine areas. As tenants had not been identified at the time of the determination, the document made assumptions as to the likely mix and location of uses, but did not analyze the potential impacts of any tenant improvement work that might ultimately be required.

While tenants have not been identified for all the buildings in the proposed project, the subleases executed since May 2014 would result in some shift in the location of uses north and south of 20th Street from those analyzed in the 2014 determination, and proposed construction of a 9,000 sf building for a restaurant use on a vacant lot used for parking. Further, the scope of some tenant improvement work is now known. In addition, the Port of San Francisco (Port) now proposes demolition of Buildings 40 and 117. Additionally the project sponsor proposes to hold up to 100 events annually in the atrium and the plaza areas of the project site. The complete project description is provided below under the subsection titled “Project Characteristics.”

¹ The Port of San Francisco often refers to Buildings 113/114 and 115/116 as pairs because they share common walls.

As a result, this environmental document is intended to analyze the potential environmental effects of the revised and updated project (i.e., the shift in the location of some uses, construction of a 9,000 sf building, demolition of Buildings 40 and 117, and the addition of events at the project site) to determine if the project revisions and tenant improvements would cause any new, significant environmental effects not previously analyzed in the Eastern Neighborhoods PEIR or the 2014 Certificate of Determination.

Project Site

Beginning in the late 19th century, Pier 70 has been a ship building and repair facility, formerly known as the Union Iron Works (UIW) facility, the Bethlehem Steel Shipyard, and the San Francisco Yard. Ships built at Pier 70 served the United States military from the Spanish-American War in the late-1800s through the two World Wars and into the 1970s. The previous uses of the buildings include the following: Shipyard Employment Office (Building 40), Main Office/Administration Building (Building 101), Power House (Building 102), UIW Headquarters (Building 104), UIW Machine Shop (Building 113), foundry (Building 114), new foundry and mold room (Buildings 115 and 116), and warehouses (Buildings 14 and 117). In the 1980s, the shipyard was purchased from Bethlehem Steel by the Port. Since 2004, the project site has been largely vacant with some buildings used for Port maintenance storage.

To the northeast of the project site is a ship repair facility, operated under a lease with the Port by Puglia Engineering. This facility provides maintenance and repairs to cruise liners, pipeline tankers, military vessels, bulk carriers, container ships, and local vessels. Currently, the secured entrance to Puglia Engineering is located between Buildings 104 and 105 on the northern side of 20th Street. The project site currently contains approximately 310,000 gross square feet (gsf) of vacant industrial and office space.

Project Characteristics

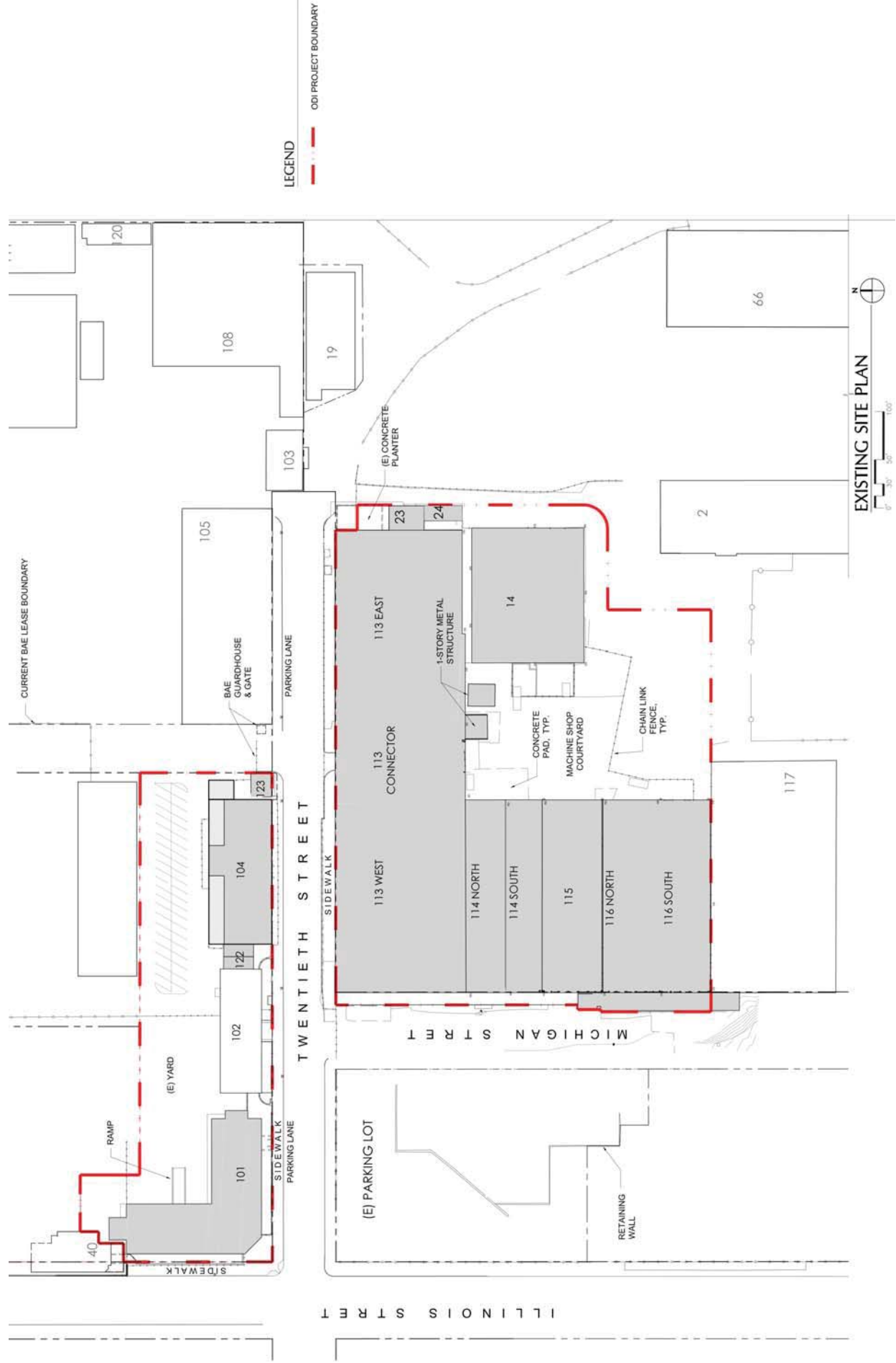
The proposed project would include the following (further details provided below):

- 1) Historic renovation of ten buildings within the 20th Street Historic Core to satisfy current seismic, structural, and code requirements;
- 2) Remediation of hazardous materials, as encountered and consistent with the Port's Feasibility Study and Remedial Action Plan, as described in Section F, Topic 15 "Hazards and Hazardous Materials";
- 3) Reuse of the buildings, including tenant improvements;
- 4) The addition of approximately 69,000 gsf of new building space, primarily in interior mezzanines, plus approximately 9,000 gsf of new restaurant space;
- 5) Removal of approximately 1,500 gsf of previous additions to Building 113 on the eastern side;
- 6) Creation of an outdoor publicly accessible plaza to be used for events, including 3,000 gsf of ancillary support retail in modified shipping containers;
- 7) Roadway, sidewalk, and parking lot improvements as described below under "Parking, Access, Circulation and Loading;" and
- 8) Demolition of Buildings 40 and 117, an approximately 8,400 sf vacant office building and an approximately 31,500 sf vacant warehouse, respectively.

Figure 1: Project Location

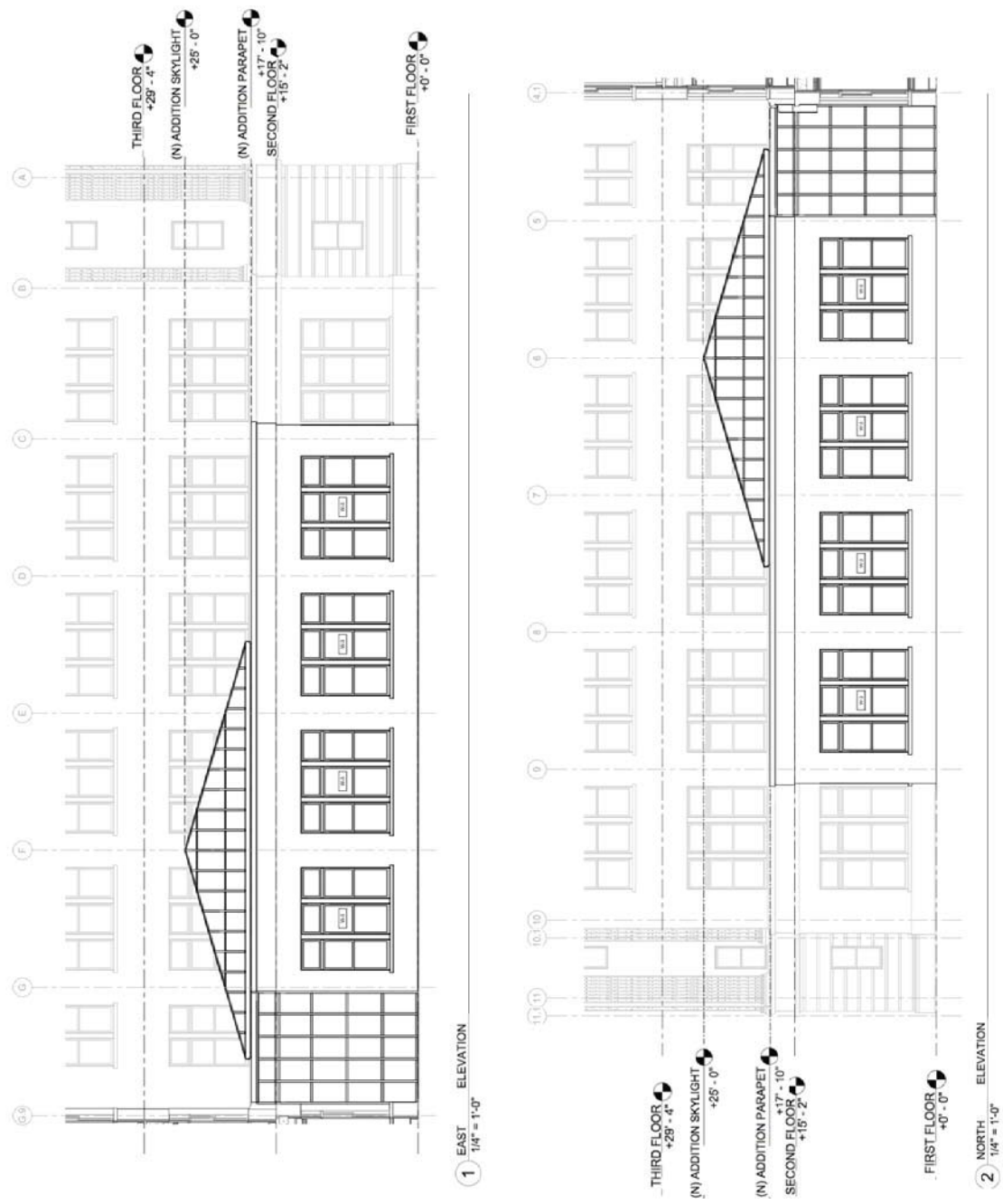


Figure 2. Site Plan



Comments: Not to Scale
Source: Marcy Wong Donn Logan Architects, March 30, 2017

Figure 3. Elevations for Proposed Building Adjacent to Building 101



Comments: Not to Scale
Source: Marcy Wong Donn Logan Architects, March 30, 2017

In total, the proposed project would include approximately 340,000 gsf of building space (consisting of approximately 224,000 gsf of Production, Distribution, and Repair (PDR)/light industrial space, 100,000 gsf of office space, and 16,000 gsf of retail space) and 42,000 sf of plaza area, as detailed in Tables 1 and 2, below.

Table 1 - North of 20th Street: Buildings 40, 101, 102, 104, 122, 123, and lot adjacent to Building 101

Building No./Name	Year Built	Former Use	Existing Use and Square Footage	2014 CPE Proposed Use in Prior Environmental Review	Current Proposed Use and Square Footage
Building 40	1941	Office	Vacant (8,359)	Not included	Demolition to allow future development, and to facilitate the rehabilitation of Building 101 and to construct pedestrian access to the future Crane Cove Park
Building 101 Bethlehem Steel Office Building	1917	Office, Light Industrial, Residential Unit	Vacant (61,311)	Office, Light Industrial, Residential Unit	Office, Light Industrial, a Residential Unit, PDR (60,525)
Lot adjacent to Building 101	N/A	Industrial	Surface Parking (9,000)	Not included	PDR showroom, Restaurant (9,000)
Building 102 Power House	1912	Industrial	Industrial; Partially Vacant (11,266)	Restaurant, Commercial	Restaurant, Commercial (15,331)
Building 104 Union Iron Works (UIW) Headquarters	1896	Office, Medical Office, Storage	Vacant (45,237)	Office, Medical Office, Storage,	Office, Medical Office, Storage, PDR (45,237)
Building 122	1916	Mechanical Equipment	Mechanical Equipment (774)	Mechanical Equipment	Mechanical Equipment (774)
Building 123	1916	Industrial	Vacant (922)	New Commercial	New Commercial (922)

Table 2 - South of 20th Street: Buildings 14, 113/114, 115/116, 117, and Plaza

Building No./Name	Year Built	Former Use	Existing Use and Square Footage	2014 CPE Proposed Use	Current Proposed Use and Square Footage
Building 14	1941	Warehouse	Storage (16,315)	Light Industrial	Light Industrial, PDR, Office (25,215)
Building 113/114-UIW Machine Shop	1885/1886	Industrial	Vacant (95,157)	Light Industrial, Publicly Accessible Atrium	Light Industrial, Office, Publicly Accessible Atrium with ancillary support retail (129,228)
Building 115/116	1916/1917	Warehouse	Storage (38,694)	Light Industrial	Light Industrial, Office (53,625)
Building 117	1937/1941	Warehouse	Vacant (31,440)	Not included	Demolition to allow for rehabilitation of Building 116 and extension of 21 st Street to the Pier 70 site.
Plaza	N/A	Industrial Yard	Courtyard (45,000)	Publically Accessible Open Space, Loading	Plaza (42,000), Container retail (3,000)

Work Completed

The project site includes four parcels that contain 12 Port-owned buildings, which are part of the Union Iron Works Historic District. Ten of those buildings—Buildings 14, 101, 102, 104, 113, 114, 115, 116, 122, and 123—constitute the "20th Street Historic Core," and under a previously issued Certificate of Determination (Case No. 2013.1168E) work has begun to rehabilitate these buildings to accommodate new uses, including selective interior demolition, abatement, seismic, life safety, ADA, core, and shell work. These buildings are considered to be individually-eligible for listing in the California Register of Historic Resources, as well as contributors to the Union Iron Works Historic District. Additionally, tenant improvement work in Buildings 104 and 14 has commenced.

The historic renovation of these buildings would meet the Secretary of the Interior's Standards for Treatment of Historic Buildings (the "Secretary's Standards"), building and other codes, and all other applicable requirements.

The secured entrance of the Puglia Engineering ship repair facility was moved approximately 100 feet north of Building 123. A portion of Michigan Street and the area to the southeast of the intersection of 20th and Illinois streets currently includes parking uses and self-storage in on-site containers and the existing

storage containers were relocated to the southeast corner of Pier 70. This work was completed under the previously issued Certificate of Determination (Case No. 2013.1168E).

Proposed Work

A new addition is proposed at the rear (north and east) of Building 101 to accommodate a new PDR showroom with restaurant. The building addition would be two stories in height with a transparent and pyramid-shaped sky-light at the roof of the second floor, and would be supported on a shallow building foundation that would require approximately three to four feet of below grade excavation. The 9,000 sf addition would include restrooms, storage, disabled access, heating, cooling, electrical and communications to support the future restaurant. The addition would result in a loss of approximately 12 parking spaces in the area behind Building 101. It is anticipated that the restaurant would seat approximately 150 and operate for lunch and dinner seven days per week. **Figure 3** shows the elevations for the new building adjacent to the existing Building 101.

Buildings 40 and 117 are outside of the 20th Street Historic Core and would be demolished by the Port. These two buildings are not individually-eligible but are considered to be contributing resources to the Union Iron Works Historic District. Building 40, which is a three-story, approximately 8,400 sf, wood-framed vacant office building, would be demolished to construct pedestrian access to the future Crane Cove Park. Additionally, the Port would demolish Building 117, which is a one-story, approximately 31,500 sf, steel-framed warehouse, to facilitate the extension of 21st Street into the Pier 70 site. Following the demolition of Buildings 40 and 117, the Port proposes to pave the vacant sites with asphalt to provide surface parking or to allow the sites to remain vacant. Building 117 is located along the planned alignment of 21st Street, therefore any surface parking constructed on the vacant site or other interim uses would likely be temporary.

Once the rehabilitation of the historic buildings is completed, these historic office and industrial buildings would include uses such as PDR, light industrial, technology, life science, office, commercial, retail, artisan/artist studios and showrooms, and residential and restaurant uses. The proposed project would also include an indoor lobby/atrium in Building 113 and an outdoor courtyard ("plaza"), both of which would be accessible to the public. The project would include planned events, primarily in the plaza, and to a lesser extent elsewhere on the project site. The proposed project would include removal of approximately 1,500 gsf of non-historic building additions to the eastern side of Building 113.

Access, Circulation, Loading, and Parking

The project site is accessible from Illinois and 20th streets, and is bisected by 20th Street. Limited surface parking (approximately 75 spaces) and loading would be provided on the northern side of Buildings 101, 102, and 104 by reusing an existing parking lot currently used by Puglia Engineering.

The proposed project includes interim repairs of 20th Street adjacent to the project site, including sidewalk and other repairs. The publicly accessible atrium in Building 113 would provide the primary pedestrian access to the buildings fronting the plaza. Louisiana Street lies to the east of Building 113, and currently exists as an access-way from 20th Street to the existing industrial yard area behind Buildings 14, 113/114, 115/116, and 117. As part of the proposed project, Louisiana Street would be widened from approximately 20 to 58 feet wide. The Louisiana Street improvements would provide vehicle access from 20th Street to the southern portion of the 20th Street Historic Core. The western side of Louisiana Street would provide a truck staging and loading area to serve the proposed project. An existing concrete slab

on the western side of Building 113 would be modified to serve as a loading dock or removed entirely to serve as an at-grade loading area. Up to five new loading docks along the western side of Buildings 113/114 and 115/116 would also be created to provide loading for these buildings.

The proposed project would provide 33 Class 1 and 30 Class 2 bicycle parking spaces.

The proposed project would include the use of the area to the west of Michigan Street as an interim surface parking lot with approximately 215 parking spaces. This area has been improved with lighting, signage, and striping. The project would include a total of 290 parking spaces. As compared to the previously issued Certificate of Determination (Case No. 2013.1168E), the current project would reduce the number of parking spaces on the project site by 12 in order to accommodate construction of the two story building adjacent to Building 101. The total net new parking spaces would be 278.

Tenant Improvements Description by Building

Building 14

New interior construction is to be an open work environment in order to maintain the open interior character for light industrial, PDR, and office uses.

Building 101

Tenant-specific improvements would include removing and replacing the existing roof structure, including lowering it into an interstitial space, in order to create a publicly-accessible rooftop deck; removing existing, non-historic interior construction and replacing it with new interior construction that respects the original double loaded corridor plan; and constructing a new stair at the perimeter of the central stair that provides access from the second floor to the third floor, and that continues on to the roof. This building currently includes one vacant residential unit. The proposed use would be office, light industrial, and PDR with one residential unit potentially returned in its original rooftop location.

Building 102

A tenant has not been identified for Building 102 but tenant improvements are expected to include buildout of a restaurant kitchen, addition of an elevator and interior mezzanine, and other restaurant interior improvements. The proposed use would be commercial (restaurant).

Building 122

Use of Building 122 for mechanical equipment would continue. New electrical and telecom equipment would be installed inside the building, and certain doors would be widened to accommodate new equipment and code requirements. No new backup generators would be required.

Buildings 104 and 123

The proposed project would include rehabilitation of Building 104 (a former office building) and its rear addition and rehabilitation of Building 123 (a former industrial building). Tenant improvements for Building 104 include new interior walls for offices, conference rooms, and support functions like kitchenettes. An existing, non-historic stair would be removed in order to install an elevator. The existing non-historic addition at the northeast corner of Building 104 would be retained and repaired for commercial reuse. This work would require exterior repair of wood framing, siding and trim, and wood doors and windows. A salvaged steel window unit is proposed at the south façade. The flat roof would

be replaced, including provisions for extending the fire escape exit to the ground. The interior would be removed and reconstructed.

At present, there is no proposed tenant for the northeast addition of Building 123. Once a tenant is secured, tenant improvement plans will be submitted to the Port.

New interior materials and finishes, including insulation, lighting and fixtures, would be compatible with the historic industrial building. Exposed building systems would be independent of the historic building structure, and new tenant interior construction would be reversible.

The proposed use of Buildings 104 would include office, medical office, storage, and PDR, while the proposed use of Building 123 would be commercial (possibly a café or other project amenity).

Buildings 113/114 and 115/116

A tenant has been identified for half of Building 113 and for Buildings 114-116 and would be office and light industrial uses. For the entirety of Buildings 113/114 and 115/116, new interior construction for tenant improvements would maintain the open interior character of the buildings, and enclosed spaces would be discretely placed.

Additionally, no more than 25 percent of the total floor area of the atrium would be permanently committed to facilities for retail, food or beverage service.

New interior construction, including offices on and under the mezzanine, and a kitchenette and bathrooms on and under the mezzanine, would be distinct from the historic structure, generally allowing vistas through the building levels. Enclosed spaces are to be few in number and discretely placed. Service and equipment areas would be discretely tucked under mezzanines or in discrete areas at about the mezzanine level.

New interior materials and finishes, including insulation, lighting and fixtures, would be compatible with the historic industrial building. Exposed building systems would be independent of the historic building structure, and new tenant interior construction would be reversible.

The proposed use of these buildings would include light industrial and office. Additionally, Building 113/114 would include a publicly accessible atrium with retail, food, or beverage service.

Plaza

No more than 20 percent of the total floor area of the plaza, which is located immediately east of Buildings 114/115/116 would be permanently committed to facilities for retail, food or beverage service. Any structures such as containers for retail use placed in the plaza would not be permitted adjacent to historic structures.

Proposed Events

The project proposes up to 100 events annually in the atrium and plaza consistent with the rules and regulations set forth by the Historic Pier 70 LLC Master Lease Agreement with the Port.^{2,3} Examples of public events that would not require the plaza/atrium closure would include farmers markets, craft fairs,

² Exhibit J: Rules and Regulation Related to Atrium and Plaza Use of the Master Lease Agreement.

³ Public events with no admission charge and no restriction of public access (e.g., farmers markets, craft fairs and free concerts), events that occur after public hours, or events that do not restrict public access and last less than three hours and occupy less than 15,000 square feet do not count against the 100 event annual cap.

and free concerts. Examples of public events that would require partial plaza/atrium closure would include ticketed concerts, ice rink, and fair/festivals with an admissions charge. Examples of events that would require the entire plaza closure would include ticketed concerts, fair/festivals, corporate events, and galas. Depending on the size of the event, approximately 100 to 5,000 attendees would be anticipated. Typical events, occurring up to an estimated eight times per month, could have an attendance of approximately 500 to 750 people, while larger-scale events, occurring approximately once per month, could have an attendance of approximately 1,000 to 5,000 people. Written notice of events would be provided to the Port at least 30 calendar days in advance, and events will comply with all applicable Port/City event regulations including those set forth by the SF Entertainment Commission, California Department of Alcoholic Beverage, Fire Marshall, Police, and Port. During public hours, the entire plaza area would not be closed for more than 25 times a year for large events, and the entire atrium would not be closed more than 15 times a year for ticketed events. Some events may require community outreach as determined at the Port's discretion. Some events could involve the use of amplified sound; amplified sound may require a permit from the Entertainment Commission. All regulated events would be subject to the Port's Good Neighbor Policy.

Transportation Demand Management Plan

As required by the City's Transportation Demand Management Program Ordinance (Ordinance 34-17, approved February 2017), the project sponsor is required to develop a Transportation Demand Management (TDM) Plan. Additionally, the project sponsor has agreed to implement TDM measures related to the following components: metrics/monitoring/evaluation; transit and ride sharing incentives; bicycling incentives; car sharing, carpool, and vanpool incentives; parking management; walking and pedestrian safety; and emergency vehicles. These measures are incorporated into the project as Project Improvement Measure 9 (see the Mitigation and Improvement Measures section of this document).

Project Construction

Construction of the proposed project would take approximately 18 to 24 months. Excavation would be required to a maximum depth of approximately four feet below the ground surface for construction of the addition adjacent to Building 101, which would result in the removal of approximately 100 cubic yards of soil. The proposed addition would be supported by a shallow building foundation. Foundation work associated with tenant improvement renovation could include micropiles. Impact piling driving is not proposed or required.

Project Approval

The proposed Pier 70 "20th Street Historic Core" project would require the approval of building permits from the Port of San Francisco. The approval of building permits by the Port (per San Francisco Administrative Code Section 31.04(h)) is the Approval Action for the proposed project. The Approval Action date establishes the start of the 30-day appeal period for this CEQA determination pursuant to Section 31.04(h) of the San Francisco Administrative Code.

B. PROJECT SETTING

The project site, which is on the east side of Illinois Street on the northern and southern sides of 20th Street, is on Pier 70 in the Central Waterfront area. The project site is characterized by late 19th- and early 20th-century industrial buildings, active industrial uses, its proximity to San Francisco Bay and presence

of Port-related uses, and some commercial and residential uses typical in an urban setting. This includes one to two-story industrial buildings and structures, both active and vacant, open lots, and industrial equipment including dry docks, pier structures, and cranes. Existing uses near the project site to the west of Illinois Street include a residential building to the northwest of the project site (820 Illinois Street) and the American Industrial Center northern building between 20th and 22nd streets. Directly adjacent to the project site to the north and south are various active and vacant Port-related industrial uses and storage areas on Pier 70. To the east of the project site is the San Francisco Bay. The project site, similar to other parcels on Pier 70, is zoned M-2. The project site has a height and bulk limit of 40-X and 65-X, and the parcels adjacent to the project site to the west of Illinois have a height and bulk limit of 68-X.

North of Building 40 on the project site, the Port proposes to develop an approximately 60,000 sf lot at the southeastern corner of the intersection of 19th and Illinois streets as an approximately 250-space surface parking lot.⁴ North of this proposed parking lot, the future Crane Cove Park project⁵ would construct a new, approximately 9.8-acre shoreline park; an extension of 19th Street for park access and circulation; creation of Georgia Street, which would connect 20th Street to the 19th Street extension; relocation of the Puglia Engineering ship repair facility entrance from 20th Street to the terminus of the 19th Street extension and rerouting the facility's truck traffic from 20th Street to the 19th Street extension; and street improvements along the eastern side of Illinois Street. Phase 1 of construction for the future Crane Cove project, underway in fall 2016, is anticipated to be completed January 2018. Phase 2 is estimated to occur between 2026 and 2028.

South of 20th Street, the Pier 70 Mixed-Use District project⁶ borders the proposed project to the east, south, and west. The Pier 70 Mixed-Use District project comprises approximately 35 acres and would provide a phased, mixed-use land use program to develop parcels for commercial or residential uses, with much of the ground floor dedicated to retail, arts, and PDR/light industrial uses. In addition, two parcels on the Pier 70 Mixed-Use project site could be developed for structured parking or for residential/commercial or residential use, depending on future market demand for parking and future travel demand patterns. Pier 70 Mixed-Use project buildings would have maximum heights of 50 to 90 feet, and the project includes transportation and circulation improvements, new and upgraded utilities and infrastructure, geotechnical and shoreline improvements, and nine acres of public open space. The project is currently undergoing environmental review and construction is anticipated to begin in 2018 and would be phased over 11 years. Building 117 of the proposed project is located within the Pier 70 Mixed-Use District project area.

C. SUMMARY OF ENVIRONMENTAL EFFECTS

This initial study – community plan evaluation analyzes the potential project-specific environmental effects of the Pier 70 "20th Street Historic Core" project described above, and incorporates by reference information contained in the programmatic EIR for the Eastern Neighborhoods Rezoning and Area Plans (PEIR).⁷ Project-specific studies were prepared for the proposed project to determine if the project would

⁴ Planning Department Case No. 2016-011016ENV.

⁵ Planning Department Case No. 2015-00131ENV.

⁶ Planning Department Case No. 2014-001272ENV.

⁷ San Francisco Planning Department Case No. 2004.0160E and State Clearinghouse No. 2005032048. Available at <http://sf-planning.org/area-plan-eirs>.

result in any significant environmental impacts that were not identified in the Eastern Neighborhoods PEIR.

This initial study – community plan evaluation indicates whether the proposed project would result in significant impacts that: (1) are peculiar to the project or project site; (2) were not identified as significant project-level, cumulative, or off-site effects in the PEIR; or (3) are previously identified significant effects, which as a result of substantial new information that was not known at the time that the Eastern Neighborhoods PEIR was certified, are determined to have a more severe adverse impact than discussed in the PEIR. Such impacts are addressed in this initial study – community plan evaluation. Items checked "Significant Impact Peculiar to Project or Project Site" identify topics for which the proposed project would result in a significant impact that is peculiar to the project, i.e., the impact is not identified as significant in the PEIR.

Mitigation measures identified in the PEIR are discussed under each topic area, and measures that are applicable to the proposed project are provided under the Mitigation Measures section at the end of this evaluation.

The Eastern Neighborhoods PEIR included analyses of environmental issues including: land use; plans and policies; visual quality and urban design; population, housing, business activity, and employment (growth inducement); transportation; noise; air quality; parks, recreation and open space; shadow; archeological resources; historic architectural resources; hazards; and other issues not addressed in the previously issued initial study for the Eastern Neighborhoods Rezoning and Area Plans. The Eastern Neighborhoods PEIR identified significant impacts related to land use, transportation, cultural resources, shadow, noise, air quality, and hazardous materials. Additionally, the PEIR identified significant cumulative impacts related to land use, transportation, and cultural resources. Mitigation measures were identified for the above impacts and reduced all impacts to less-than-significant levels except for those related to land use (cumulative impacts on PDR use), transportation (program-level and cumulative traffic impacts at nine intersections; program-level and cumulative transit impacts on seven Muni lines), cultural resources (cumulative impacts from demolition of historical resources), and shadow (program-level impacts on parks).

The proposed project would include the shift in the location of uses in the project site as previously evaluated in the 2014 Certificate of Determination, construction of a 9,000 gsf building, demolition of Buildings 40 and 117, and the addition of events at the project site. The proposed project is in conformance with the with the height, use and density for the site described in the Eastern Neighborhoods PEIR^{8,9} and would represent a small part of the growth that was forecast for the Eastern Neighborhoods plan areas.

In regards to significant and unavoidable transportation impacts related to traffic and transit, project-generated vehicle and transit trips would not contribute considerably to significant and unavoidable cumulative traffic and transit impacts identified in the Eastern Neighborhoods PEIR and would not result

⁸ San Francisco Planning Department, Community Plan Evaluation Eligibility Determination, Citywide Planning and Policy Analysis Illinois and 20th Streets/Pier 70 ("20th Street Historic Core"), February 23, 2017.

⁹ San Francisco Planning Department, Community Plan Evaluation Eligibility Determination, Current Planning Analysis, Illinois and 20th Streets/Pier 70 ("20th Street Historic Core"), January 18, 2017.

in a substantial portion of the overall additional traffic and transit volume anticipated to be generated by Plan Area projects. The proposed project would not contribute to significant and unavoidable plan-level or cumulative shadow impacts or land use impacts related to the loss of PDR building space as the proposed project would not cast new shadow on parks or any other nearby open space or remove PDR building space.

This initial study – community plan evaluation concludes that the proposed project would result in a new, significant adverse environmental effects on historic resources and bats that were not disclosed in the Eastern Neighborhoods PEIR and a focused mitigated negative declaration has been prepared to address these significant project-specific, peculiar impacts. This initial study analyzes the environmental effects of the proposed project on historic architectural resources and bats and includes mitigation measures that would reduce these impacts to less than significant levels.

Thus, with the exception of historic architectural resources and bats, the Eastern Neighborhoods PEIR considered the incremental impacts of the proposed Pier 70 "20th Street Historic Core" project. The Eastern Neighborhoods PEIR identified feasible mitigation measures to address significant impacts related to noise, air quality, archeological resources, historic resources, hazardous materials and transportation. **Table 3** below lists the mitigation measures identified in the Eastern Neighborhoods PEIR and states whether each measure would apply to the proposed project.

Table 3 – Eastern Neighborhoods PEIR Mitigation Measures

Mitigation Measure	Applicability	Compliance
F. Noise		
F-1: Construction Noise (Pile Driving)	Not Applicable: pile driving not proposed.	Not Applicable.
F-2: Construction Noise	Applicable: the project would involve noisy construction procedures and there are nearby noise-sensitive uses approximately 60 feet from the project site.	The project sponsor has agreed to develop and implement a set of noise attenuation measures during construction (Project Mitigation Measure 4).
F-3: Interior Noise Levels	Not Applicable: no new residential units are proposed.	Not Applicable.
F-4: Siting of Noise-Sensitive Uses	Not Applicable: no new residential units are proposed.	Not Applicable.
F-5: Siting of Noise-Generating Uses	Applicable: the project includes noise-generating uses (including events) and not all tenants are known.	The project sponsor has agreed to implement this mitigation measure to ensure that noise-generating tenants and events would not have a significant effect on the existing ambient noise levels (Project Mitigation

Mitigation Measure	Applicability	Compliance
		Measures 5 and 6).
F-6: Open Space in Noisy Environments	Not Applicable: the project does not include new noise sensitive uses.	Not Applicable.
G. Air Quality		
G-1: Construction Air Quality	Applicable: a portion of the project site is located within the Air Pollution Exposure Zone and the project would use diesel equipment during construction in close proximity to existing residential uses on Illinois Street.	The project sponsor has agreed to comply with construction emissions minimization requirements (Project Mitigation Measure 7).
G-2: Air Quality for Sensitive Land Uses	Not Applicable: the project does not propose new sensitive land uses.	Not Applicable.
G-3: Siting of Uses that Emit Diesel Particulate Matter (DPM)	Applicable: the project proposes industrial and PDR uses and not all tenants are known.	The project sponsor has agreed to implement this mitigation measure to ensure that future tenants with industrial and PDR uses do not emit substantial levels of DPM (Project Mitigation Measure 8).
G-4: Siting of Uses that Emit other Toxic Air Contaminants (TAC)	Applicable: the project proposes industrial and PDR uses and not all tenants are known.	The project sponsor has agreed to implement this mitigation measure to ensure that future tenants with industrial and PDR uses do not emit substantial levels of TACs (Project Mitigation Measure 9).
J. Archeological Resources		
J-1: Properties with Previous Studies	Not Applicable: the project site does not have any previous archeological studies associated with it.	Not Applicable.
J-2: Properties with no Previous Studies	Applicable: the project site is a property with no previous archeological study.	The project underwent preliminary archeology review and the Planning Department's archeologist determined that

Mitigation Measure	Applicability	Compliance
		Archeological Monitoring would be required for the proposed project, which the project sponsor has agreed to implement (Project Mitigation Measure 3).
J-3: Mission Dolores Archeological District	Not Applicable: the project site is not located within the Mission Dolores Archeological District.	Not Applicable.
K. Historical Resources		
K-1: Interim Procedures for Permit Review in the Eastern Neighborhoods Plan area	Not Applicable: plan-level mitigation completed by Planning Department.	Not Applicable.
K-2: Amendments to Article 10 of the Planning Code Pertaining to Vertical Additions in the South End Historic District (East SoMa)	Not Applicable: plan-level mitigation completed by Planning Commission.	Not Applicable.
K-3: Amendments to Article 10 of the Planning Code Pertaining to Alterations and Infill Development in the Dogpatch Historic District (Central Waterfront)	Not Applicable: plan-level mitigation completed by Planning Commission.	Not Applicable.
L. Hazardous Materials		
L-1: Hazardous Building Materials	Applicable: the project includes remodel and demolition of buildings with known prior and current light industrial uses.	The project sponsor has agreed to comply with hazardous building material abatement requirements (Project Mitigation Measure 11).
E. Transportation		
E-1: Traffic Signal Installation	Not Applicable: automobile delay removed from CEQA analysis.	Not Applicable.
E-2: Intelligent Traffic Management	Not Applicable: automobile delay removed from CEQA analysis.	Not Applicable.
E-3: Enhanced Funding	Not Applicable: automobile delay removed from CEQA	Not Applicable.

Mitigation Measure	Applicability	Compliance
	analysis.	
E-4: Intelligent Traffic Management	Not Applicable: automobile delay removed from CEQA analysis.	Not Applicable.
E-5: Enhanced Transit Funding	Not Applicable: plan level mitigation by the San Francisco Municipal Transportation Agency (SFMTA).	Not Applicable.
E-6: Transit Corridor Improvements	Not Applicable: plan level mitigation by SFMTA.	Not Applicable.
E-7: Transit Accessibility	Not Applicable: plan level mitigation by SFMTA.	Not Applicable.
E-8: Muni Storage and Maintenance	Not Applicable: plan level mitigation by SFMTA.	Not Applicable.
E-9: Rider Improvements	Not Applicable: plan level mitigation by SFMTA.	Not Applicable.
E-10: Transit Enhancement	Not Applicable: plan level mitigation by SFMTA.	Not Applicable.
E-11: Transportation Demand Management	Not Applicable: plan level mitigation by SFMTA, and in compliance with a portion of this mitigation measure, the City adopted a comprehensive Transportation Demand Management Program for most new development citywide.	Not Applicable.

Please see Section G. Mitigation and Improvement Measures for the complete text of the applicable mitigation measures.

D. CHANGES IN THE REGULATORY ENVIRONMENT

Since the certification of the Eastern Neighborhoods PEIR in 2008, several new policies, regulations, statutes, and funding measures have been adopted, passed, or are underway that affect the physical environment and/or environmental review methodology for projects in the Eastern Neighborhoods plan areas. As discussed in each topic area referenced below, these policies, regulations, statutes, and funding measures have implemented or will implement mitigation measures or further reduce less-than-significant impacts identified in the PEIR. These include:

- State legislation amending CEQA to eliminate consideration of aesthetics and parking impacts for infill projects in transit priority areas, effective January 2014.
- State legislation amending CEQA and San Francisco Planning Commission resolution replacing level of service (LOS) analysis of automobile delay with vehicle miles traveled (VMT) analysis, effective March 2016 (see "Automobile Delay and Vehicle Miles Traveled" heading below).
- The adoption of interim controls requiring additional design standards for large project authorizations within the Showplace Square/Potrero Hill and Central Waterfront plan areas of the Eastern Neighborhoods effective February 2016 through August 2017.
- San Francisco Bicycle Plan update adoption in June 2009, Better Streets Plan adoption in 2010, Transit Effectiveness Project (aka "Muni Forward") adoption in March 2014, Vision Zero adoption by various City agencies in 2014, Proposition A and B passage in November 2014, and the Transportation Sustainability Program (see initial study Transportation section).
- San Francisco ordinance establishing Noise Regulations Related to Uses near Places of Entertainment effective June 2015 (see initial study Noise section).
- San Francisco ordinances establishing Construction Dust Control, effective July 2008, and Enhanced Ventilation Required for Urban Infill Sensitive Use Developments, amended December 2014 (see initial study Air Quality section).
- San Francisco Clean and Safe Parks Bond passage in November 2012 and San Francisco Recreation and Open Space Element of the General Plan adoption in April 2014 (see initial study Recreation section).
- Urban Water Management Plan adoption in 2011 and Sewer System Improvement Program process (see initial study Utilities and Service Systems section).
- Article 22A of the Health Code amendments effective August 2013 (see initial study Hazardous Materials section).

Aesthetics and Parking

In accordance with CEQA Section 21099 – Modernization of Transportation Analysis for Transit Oriented Projects – aesthetics and parking shall not be considered in determining if a project has the potential to result in significant environmental effects, provided the project meets all of the following three criteria:

- a) The project is in a transit priority area;
- b) The project is on an infill site; and
- c) The project is residential, mixed-use residential, or an employment center.

The proposed project meets each of the above three criteria and thus, this checklist does not consider aesthetics or parking in determining the significance of project impacts under CEQA.¹⁰ The project site is an infill site in a transit priority area because the project site has been previously developed and is located within one-half mile of a major transit stop. The proposed project meets the definition of an employment

¹⁰ San Francisco Planning Department. Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis for Illinois and 20th Streets/Pier 70 ("20th Street Historic Core"), December 28, 2016. This document (and all other documents cited in this report, unless otherwise noted), is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400 as part of Case File No. 2016-000346ENV.

center use because the project site is zoned for commercial uses with a floor area ratio of no less than 0.75 and located within a transit priority area.¹¹ Therefore, this initial study does not consider aesthetics or parking in determining the significance of project impacts under CEQA. Project elevations for the new structure adjacent to Building 101 are included in the project description (see Figure 3).

Automobile Delay and Vehicle Miles Traveled

In addition, CEQA Section 21099(b)(1) requires that the State Office of Planning and Research (OPR) develop revisions to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects that "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." CEQA Section 21099(b)(2) states that upon certification of the revised guidelines for determining transportation impacts pursuant to Section 21099(b)(1), automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment under CEQA.

In January 2016, OPR published for public review and comment a [*Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*](#)¹² recommending that transportation impacts for projects be measured using a vehicle miles traveled (VMT) metric. On March 3, 2016, in anticipation of the future certification of the revised CEQA Guidelines, the San Francisco Planning Commission adopted OPR's recommendation to use the VMT metric instead of automobile delay to evaluate the transportation impacts of projects (Resolution 19579). (Note: the VMT metric does not apply to the analysis of project impacts on non-automobile modes of travel such as transit, walking, and bicycling.) Therefore, impacts and mitigation measures from the Eastern Neighborhoods PEIR associated with automobile delay are not discussed in this checklist, including PEIR Mitigation Measures E-1: Traffic Signal Installation, E-2: Intelligent Traffic Management, E-3: Enhanced Funding, and E-4: Intelligent Traffic Management. Instead, a VMT analysis is provided in the Transportation section.

E. COMPATIBILITY WITH EXISTING ZONING AND PLANS

	<i>Applicable</i>	<i>Not Applicable</i>
Discuss any variances, special authorizations, or changes proposed to the Planning Code or Zoning Map, if applicable.	☒	☐
Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.	☒	☐
Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection, or from Regional, State, or Federal Agencies.	☒	☐

San Francisco Planning Code

The project site is located within the Heavy Industrial (M-2) Zoning District. This district is the least restrictive in terms of permissible land uses and is primarily located along the eastern edge of San

¹¹ The total gross building area of the proposed project is approximately 340,000 gsf, and the area of the project site is 2,831,400 (65 acres). Therefore, the Floor Area Ratio is 8.3, which is greater than 0.75.

¹² This document is available online at: https://www.opr.ca.gov/s_sb743.php.

Francisco, separated from residential and commercial areas. The heavier industries are permitted, with fewer requirements as to screening and enclosure than in Light Industrial M-1 Districts, but many of these uses are permitted only as conditional uses or at a considerable distance from residential districts. Most of the land zoned M-2 is controlled by the Port of San Francisco. The proposed historic renovation, reuse, and improvement of the 20th Street Historic Core is consistent with the zoning controls and uses permitted within the M-2 Zoning District. The project site is also within the 40-X and 65-X height and bulk district, and the proposed development complies with the height and bulk district.

San Francisco General Plan

In addition to the Planning Code and its land use zoning requirements, the project site is subject to the San Francisco General Plan (General Plan). The General Plan provides general policies and objectives to guide land use decisions. The General Plan contains 10 elements (Commerce and Industry, Recreation and Open Space, Housing, Community Facilities, Urban Design, Environmental Protection, Transportation, Air Quality, Community Safety, and Arts) that set forth goals, policies, and objectives for the physical development of the City. Due to the infill nature of the proposed project, there would be no anticipated conflicts with the General Plan.

Central Waterfront Area Plan

The Central Waterfront Area Plan is one of the four plan areas covered by the Eastern Neighborhoods Rezoning and Area Plan, which was adopted in 2008. The Eastern Neighborhoods encompass much of the City's industrial zoned land and have been transitioning to other uses over the past several decades. One of the goals of the Eastern Neighborhoods planning effort was to find a balance between growth of housing and office uses and preservation of PDR facilities. The Central Waterfront Area Plan acknowledges recent changes in the land use character in the vicinity of the project site within the northern portion of the Central Waterfront Area Plan.

Portions of the Central Waterfront have been transitioning from PDR to a more mixed-use character. This has been particularly the case in the northern portion of the neighborhood, with new residential development and a small amount of new retail occurring along Third Street. In addition, life science and medical related uses are expected to desire locations close to Mission Bay in the northern portion of this neighborhood. This mix of uses in the northern portion of the neighborhood should be maintained and promoted, while the core PDR areas south of 23rd Street and east of Third Street should be protected.²

The Planning Department has determined that the proposed project is consistent with the development density envisioned in the Central Waterfront Plan.¹³

Port of San Francisco

Waterfront Land Use Plan

Approved in June 1997, the Port of San Francisco's Waterfront Land Use Plan (WLUP) is a land use policy document governing property under the jurisdiction of the Port of San Francisco, generally from Fisherman's Wharf to India Basin.¹⁴ The project site is located within the Waterfront Plan's Southern

¹³ San Francisco Planning Department, Community Plan Evaluation Eligibility Determination, Citywide Planning and Policy Analysis Illinois and 20th Streets/Pier 70 ("20th Street Historic Core"), February 23, 2017.

¹⁴ City and County of San Francisco, Port of San Francisco, *Waterfront Land Use Plan*, Revised Version, 2009 (hereinafter referred to as "Revised WLUP"). Available online at <http://www.sfport.com/index.aspx?page=294>. Accessed December 6, 2016.

Waterfront Subarea. The Southern Waterfront Subarea extends from Mariposa Street, north of the project site, south to and including India Basin.¹⁵ The WLUP contains the following objectives for the Southern Waterfront Subarea:¹⁶

- Maximize the utilization of existing cargo terminal facilities.
- Pursue financing mechanisms to develop competitively priced maritime support facilities in the Southern Waterfront.
- Maximize the productivity of Port assets through interim use of property reserved for maritime expansion.
- Development of non-maritime land uses that would be beneficial to the Port and compatible with maritime activities in areas which are surplus to long-term maritime needs.
- Promote non-maritime activities in and around three historic Union Iron Works buildings to facilitate the revitalization of an area that survives as an example of San Francisco's earliest maritime industry.
- Reserve or improve areas which will provide opportunities for the protection of wildlife habitat and for passive and active recreational uses.
- Enhance the public's appreciation of the waterfront by providing greater opportunities for access in a manner which does not compromise the efficiency of maritime operations.

In 2014-2015, Port staff completed the comprehensive WLUP 1997-2014 Review Report and have developed a public process for targeted updates to the WLUP. Draft updates to the WLUP are anticipated in the spring of 2017. Due to the infill nature of the proposed project, there would be no anticipated conflicts with the Waterfront Land Use Plan.

Regional Plans and Policies

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

- The principal regional planning documents and the agencies that guide planning in the nine-county Bay Area include *Plan Bay Area*, the region's first Sustainable Communities Strategy, developed in accordance with Senate Bill 375 and adopted jointly by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) on July 18, 2013. *Plan Bay Area* is a long-range land use and transportation plan that covers the period from 2010 to 2040. *Plan Bay Area* calls for concentrating housing and job growth around transit corridors, particularly within areas identified by local jurisdictions as Priority Development Areas. In addition, *Plan Bay Area* specifies strategies and investments for maintaining, managing, and improving the region's multi-modal transportation network and proposes transportation projects and programs to be implemented with reasonably anticipated revenue. *Plan Bay Area* will be updated every four years. *Plan Bay Area* includes the population and employment forecasts from ABAG's Projections 2013, which is an advisory policy document used to assist in the development of local and regional plans and policy documents, and MTC's 2040 *Regional*

¹⁵ City and County of San Francisco, Port of San Francisco, *Revised WLUP*, Map of the Southern Waterfront Subarea, Revised Version, 2009, p. 163A.

¹⁶ City and County of San Francisco, Port of San Francisco, *Revised WLUP*, pp. 155-161.

Transportation Plan, which is a policy document that outlines transportation projects for highway, transit, rail, and related uses through 2040 for the nine Bay Area counties;

- The Bay Area Air Quality Management District (BAAQMD)'s *2010 Clean Air Plan* updates the Bay Area 2005 Ozone Strategy, in accordance with the requirements of the California Clean Air Act (CCAA), to implement feasible measures to reduce ozone and provide a control strategy to reduce ozone, particulate matter (PM), air toxics, and greenhouse gas emissions throughout the region; and
- The San Francisco Regional Water Quality Control Board's *Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan)* is a master water quality control planning document. It designates beneficial uses and water quality objectives for waters of the state, including surface waters and groundwater, and includes implementation programs to achieve water quality objectives.

The proposed project has been reviewed against these regional plans and policies. Due to the infill nature of the proposed project, there would be no anticipated conflicts with regional plans. Therefore, the proposed project would not obviously or substantially conflict with regional plans or policies.

F. EVALUATION OF ENVIRONMENTAL EFFECTS

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
1. LAND USE AND LAND USE PLANNING—Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒
c) Have a substantial impact upon the existing character of the vicinity?	☐	☐	☐	☒

The Eastern Neighborhoods PEIR determined that adoption of the rezoning and area plans would result in an unavoidable significant impact on land use due to the cumulative loss of PDR. The proposed project would not remove any existing PDR uses and would therefore not contribute to any impact related to loss of PDR uses that was identified in the Eastern Neighborhoods PEIR.

The project site is in the Central Waterfront Plan Subarea and is in the Heavy Industrial (M-2) Zoning District. This district is the least restrictive in terms of permissible land uses and is primarily located along the eastern edge of San Francisco, separated from residential and commercial areas. The heavier industries are permitted, with fewer requirements as to screening and enclosure than in Light Industrial M-1 Districts, but many of these uses are permitted only as conditional uses or at a considerable distance from residential districts. Most of the land zoned M-2 is controlled by the Port of San Francisco. The

proposed historic renovation, reuse, and improvement of the 20th Street Historic Core is consistent with the zoning controls and uses permitted within the M-2 Zoning District.

The Eastern Neighborhoods PEIR determined that implementation of the area plans would not create any new physical barriers in the Eastern Neighborhoods because the rezoning and area plans do not provide for any new major roadways, such as freeways that would disrupt or divide the plan area or individual neighborhoods or subareas. The proposed project would similarly not create any new physical barriers that would disrupt or divide the project site or its surroundings. In fact, the proposed project would facilitate better access to the future Crane Cove Park and Pier 70 Mixed-Used District development by removal of buildings 40 and 117.

The Citywide Planning and Current Planning divisions of the Planning Department have determined that the proposed project is permitted in the M-2 Zoning District and is consistent with the development density envisioned in the Central Waterfront Plan.^{17,18}

Because the proposed project is consistent with the development density established in the Eastern Neighborhoods Rezoning and Area Plans, implementation of the proposed project would not result in significant impacts that were not identified in the Eastern Neighborhoods PEIR related to land use and land use planning, and no mitigation measures are necessary. In addition, the Pier 70 Mixed-Use District Draft Environmental Impact Report (DEIR) included the proposed project in its cumulative analysis and did not identify a significant cumulative land use impact.¹⁹ Therefore, the proposed project would have a less than significant cumulative land use impact.

Topics:	<u>Significant Impact Peculiar to Project or Project Site</u>	<u>Significant Impact not Identified in PEIR</u>	<u>Significant Impact due to Substantial New Information</u>	<u>No Significant Impact not Previously Identified in PEIR</u>
2. POPULATION AND HOUSING— Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

¹⁷ San Francisco Planning Department, *Community Plan Evaluation Eligibility Determination, Citywide Planning and Policy Analysis Illinois and 20th Streets/Pier 70 ("20th Street Historic Core")*, February 23, 2017.

¹⁸ San Francisco Planning Department, *Community Plan Evaluation Eligibility Determination, Current Planning Analysis, Illinois and 20th Streets/Pier 70 ("20th Street Historic Core")*, January 18, 2017.

¹⁹ San Francisco Planning Department, *Pier 70 Mixed-Use District Project, Draft Environmental Impact Report*, Case No. 2014-001272ENV, December 21, 2016. This document is available online at <http://sf-planning.org/environmental-impact-reports-negative-declarations>, accessed April 24, 2017.

One of the objectives of the Eastern Neighborhoods area plans is to identify appropriate locations for housing in the City's industrially zoned land to meet the citywide demand for additional housing. The PEIR assessed how the rezoning actions would affect housing supply and location options for businesses in the Eastern Neighborhoods and compared these outcomes to what would otherwise be expected without the rezoning, assuming a continuation of development trends and ad hoc land use changes (such as allowing housing within industrial zones through conditional use authorization on a case-by-case basis, site-specific rezoning to permit housing, and other similar case-by-case approaches). The PEIR concluded that adoption of the rezoning and area plans: "would induce substantial growth and concentration of population in San Francisco." The PEIR states that the increase in population expected to occur as a result of the proposed rezoning and adoption of the area plans would not, in itself, result in adverse physical effects, and would serve to advance key City policy objectives, such as providing housing in appropriate locations next to Downtown and other employment generators and furthering the City's transit first policies. It was anticipated that the rezoning would result in an increase in both housing development and population in all of the area plan neighborhoods. The Eastern Neighborhoods PEIR determined that the anticipated increase in population and density would not directly result in significant adverse physical effects on the environment. However, the PEIR identifies significant cumulative impacts on the physical environment that would result indirectly from growth afforded under the rezoning and area plans, including impacts on land use, traffic and transportation, air quality, and noise. The PEIR contains detailed analyses of these secondary effects under each of the relevant resource topics, and identifies mitigation measures to address significant impacts where feasible.

The PEIR determined that implementation of the rezoning and area plans would not have a significant impact from the direct displacement of existing residents, and that each of the rezoning options considered in the PEIR would result in less displacement as a result of unmet housing demand than would be expected under the No-Project scenario because the addition of new housing would provide some relief to housing market pressure without directly displacing existing residents. However, the PEIR also noted that residential displacement is not solely a function of housing supply, and that adoption of the rezoning and area plans could result in indirect, secondary effects on neighborhood character through gentrification that could displace some residents. The PEIR discloses that the rezoned districts could transition to higher-value housing, which could result in gentrification and displacement of lower-income households, and states moreover that lower-income residents of the Eastern Neighborhoods, who also disproportionately live in crowded conditions and in rental units, are among the most vulnerable to displacement resulting from neighborhood change.

Pursuant to CEQA Guidelines 15131 and 15064(e), economic and social effects such as gentrification and displacement are only considered under CEQA where these effects would cause substantial adverse physical impacts on the environment. Only where economic or social effects have resulted in adverse physical changes in the environment, such as "blight" or "urban decay" have courts upheld environmental analysis that consider such effects. But without such a connection to an adverse physical change, consideration of social or economic impacts "shall not be considered a significant effect" per CEQA Guidelines 15382. While the Eastern Neighborhoods PEIR disclosed that adoption of the Eastern Neighborhoods Rezoning and Area Plans could contribute to gentrification and displacement, it did not determine that these potential socio-economic effects would result in significant adverse physical impacts on the environment.

The proposed project would not involve the displacement of people. No housing would be removed; therefore the construction of replacement housing would not be necessary. The project would include approximately 266,000 square feet of industrial use, 45,000 square feet of office use, and 27,000 square feet of commercial use, resulting in approximately 1,204 employees.²⁰ The direct effects of the proposed project on population and housing would not result in new or substantially more severe significant impacts on the physical environment beyond those identified in the Eastern Neighborhoods PEIR. The project's contribution to indirect effects on the physical environment attributable to population growth are evaluated in this initial study under land use, transportation and circulation, noise, air quality, greenhouse gas emissions, recreation, utilities and service systems, and public services. In addition, the Pier 70 Mixed-Use District DEIR included the proposed project in its cumulative analysis and did not identify a significant cumulative impact to population and housing. Therefore, the proposed project would have a less than significant cumulative impact to population and housing.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
3. CULTURAL AND PALEONTOLOGICAL RESOURCES—Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code?	☒	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	☒
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

Historic Architectural Resources

Pursuant to CEQA Guidelines Sections 15064.5(a)(1) and 15064.5(a)(2), historical resources are buildings or structures that are listed, or are eligible for listing, in the California Register of Historical Resources or are identified in a local register of historical resources, such as Articles 10 and 11 of the San Francisco Planning Code. The Eastern Neighborhoods PEIR determined that future development facilitated through the changes in use districts and height limits under the Eastern Neighborhoods Area Plans could have substantial adverse changes on the significance of both individual historical resources and on historical districts within the Plan Areas. The PEIR determined that approximately 32 percent of the

²⁰ Industrial, office, and retail employment was calculated using information in the 2002 Transportation Impacts Analysis Guidelines for Environmental Review (Transportation Guidelines).

known or potential historical resources in the Plan Areas could potentially be affected under the preferred alternative. The Eastern Neighborhoods PEIR found this impact to be significant and unavoidable. This impact was addressed in a Statement of Overriding Considerations with findings and adopted as part of the Eastern Neighborhoods Rezoning and Area Plans approval on January 19, 2009.

The below section relies on a Historic Resource Evaluation Response that was prepared for the proposed project.²¹

The project site includes four parcels which contain 12 Port-owned buildings, which are part of the Union Iron Works Historic District, which is considered a historic resource for the purposes of CEQA. Ten of those buildings—Buildings 14, 101, 102, 104, 113, 114, 115, 116, 122, and 123—constitute the "20th Street Historic Core," and would be rehabilitated to accommodate new uses. These buildings are considered to be individually-eligible for listing in the California Register of Historic Places (California Register), as well as contributors to the Union Iron Works Historic District. Buildings 40 and 117 are outside of the 20th Street Historic Core and would be demolished. These two buildings are not individually-eligible for listing in the California Register but are considered to be contributing resources to the Union Iron Works Historic District.

The Union Iron Works Historic District (District) is a 65-acre Port-owned property located on the east side of Illinois Street between 18th and 22nd Streets along the San Francisco Bay in the Central Waterfront area. The district is associated with the first steel hull shipyard on the West Coast, as well as ongoing ship construction and repair activities that played a significant role in the creation of the United States steel hull ship building industry. The shipyard also directly supported naval operations during all major wars between the Spanish-American War and World War II. The district includes significant examples of industrial architecture from all periods of construction and expansion at the shipyard, including notable architect and engineer designed buildings. The district illustrates the evolution of factory design from the opening of the yard in the early 1880s to the end of World War II. The district has a period of significance ranging from 1884 to 1945.

The district is comprised of forty-four (44) contributing and ten (10) non-contributing resources, including buildings, wharves, piers, slipways, cranes, segments of a railroad network, and landscape elements. The buildings represent a range of industrial architecture, including heavy brick masonry buildings in the American round-arched style; Renaissance Revival-style brick buildings; steel framed, sheet metal clad buildings featuring industrial roof forms, such as saw-tooth and Aiken roofs; and reinforced concrete buildings featuring Mediterranean and Classical Revival-style detailing or early expressions of Moderne style. Several high-style buildings along 20th Street were designed by prominent San Francisco architectural firms during the late nineteenth and early twentieth centuries, such as Percy & Hamilton (Building 104), Charles Peter Weeks (Building 102), and Frederick H. Meyer (Building 101). The district also consists of waterfront structures inherent to shipbuilding and ship repair, including slipways and cranes associated with ship hull construction, and wharves, piers, wet basins and floating drydocks for ship outfitting and ship repair activities. The district maintains exceptional integrity in terms of location, design, setting, materials, workmanship, feeling, and association.

²¹ San Francisco Planning Department, *Historic Resource Evaluation Response, Pier 70 "20th Street Historic Core"*, April 2017.

The entire property was previously identified in the 2001 Central Waterfront Cultural Resources Survey as an eligible National Register Historic District.²² The California Office of Historic Preservation (OHP) determined that the shipyard was eligible for the National Register of Historic Places (NRHP) in 2001. As of January 2014, the Port is seeking to designate this district in the NRHP.

The proposed historic renovation of the buildings would meet the Secretary of the Interior Standards for Treatment of Historic Buildings (the "Secretary's Standards"), building and other codes, and all other applicable requirements. A determination of consistency with the Secretary's Standards would be made by the Port as a part of its review and approval of building permits for project construction. Further, the National Park Service will also review the proposed work and determine consistency with the Standards because the project sponsor has applied for Federal Rehabilitation Tax Credits. The Port, in consultation with the Maritime Museum, would oversee the salvage of building contents.²³

Demolition of Buildings 40 and 117

As part of the environmental review for Pier 70 BAE (now Puglia Engineering) Ship Repair (Case No. 2014.0713E), Department staff previously examined the cumulative impact of demolition within the Union Iron Works Historic District, which included the demolition of Buildings 40 and 117. As noted in this analysis, the historic district was planned to accommodate a limited amount of demolition and a substantial amount of new development. In addition, a significant concentration of World War II era contributing resources would remain and would continue to provide strong visual and physical examples of the WWII era of the district, and new infill development would help support the adaptive use of the remaining historic resources. The Department finds that the proposed demolition of Buildings 40 and 117 would not impact the designation of the historic district within the NRHP. In addition, the proposed demolition would not materially impair the eligibility of the Union Iron Works Historic District.

Tenant Improvements & Rehabilitation Work in 20th Street Historic Core

In April 2010, the Port completed a Pier 70 Preferred Master Plan that included policies that called for the creation of a Pier 70 NRHP Historic District, and the Plan also specified that all work in the proposed district must be consistent with the Secretary's Standards. The Port Commission endorsed the Preferred Master Plan in 2010, and thereafter, Port staff prepared a nomination and listed the Union Iron Works Historic District in the National Register in 2014. As a result of these actions, the Port reviews all proposed construction, rehabilitation and alteration of contributing resources within the Union Iron Works Historic District for consistency with the Secretary's Standards. The Port's staff level review requires preparation of a Historic Resources Evaluation (HRE) for the specific scopes of work by Port staff or the project sponsor's qualified historic preservation architect.

In 2013, the Port executed a long-term 60-year lease with Orton Development for the rehabilitation of the 20th Street Historic Buildings. The agreement requires Orton to seek Federal Rehabilitation Tax Credits to help support the rehabilitation of the contributing resources within the leasehold. To date, the rehabilitation project has been determined eligible for tax credits and has secured conditional approval of

²² San Francisco Planning Department, Central Waterfront Cultural Resources Survey. Available online at http://sf-planning.org/sites/default/files/FileCenter/Documents/780-Central_Waterfront_Context.pdf. Accessed on April 4, 2017.

²³ Contents not salvaged by the Port would be salvaged or disposed of by the project sponsor. Interior fixtures and historic materials that are part of a building would be salvaged by the project sponsor.

a rehabilitation plan that would renovate and upgrade the core and shell of these contributing resources to support new tenants. The Rehabilitation Tax Credit process requires review and certification of all scopes of work for consistency with the Secretary's Standards by the Office of Historic Preservation (OHP) and NPS. The Port coordinates its review and approval of proposed work and issuance of Port building permits with the Rehabilitation Tax Credit process so that only approval by NPS is based on a determination of consistency with the Secretary's Standards.

Since the tenants for Buildings 102, 113-114 and 115-116 have yet to be determined and the design for proposed improvements for occupancy and tenant buildout of each resource have yet to be defined, the proposed project has the potential to create a significant impact on the specific contributing resources and potentially the Union Iron Works Historic District. Based on the preliminary conceptual architectural drawings prepared for the prior HRE analysis in support of the issuance of the CPE for the historic renovation of the core and shell of all eight contributing resources (Case No. 2013.1168E), and the conditional approval of the Rehabilitation Tax Credit application, it appears that the project has the potential to meet the Secretary's Standards. However, given the level of available information, design and performance criteria must be incorporated to reduce significant impacts on historic resources to a less-than-significant level. Department staff finds that the overall proposed project would not cause a significant adverse impact upon a historic resource such that the significance of the district would be materially impaired with the incorporation of Project Mitigation Measure 1: Documentation and Project Mitigation Measure 2: Performance Measures. These mitigation measures would ensure that the proposed work is consistent with the Secretary's Standards. Specifically, Project Mitigation 1 would require the project sponsor to prepare written and photographic documentation before commencing tenant occupancy and buildout, and Project Mitigation Measure 2 provides a series of design and performance measures to ensure that the proposed renovation does not impact character-defining features of each contributing resource as detailed in the UIW Historic District National Register nomination.²⁴ With implementation of Project Mitigation Measures 1 and 2, the project would result in less-than-significant impacts on historic resources.

Project Mitigation Measure 1: Documentation

Before demolishing Buildings 40 and 117, the project sponsor shall retain a professional that meets the Secretary of the Interior's Professional Qualifications Standards for Architectural History to prepare written and photographic documentation of Buildings 40 and 117. The documentation shall be prepared consistent with Historic American Building Survey (HABS) guidelines published by the National Park Service (NPS). The HABS documentation shall be submitted to the Planning Department historic preservation staff for review and approval prior to transmittal to the Northwest Information Center of the California Information Resource System and the History Room at the San Francisco Main Public Library. Demolition of Buildings 40 and 117 shall not be authorized by the Port until Planning has approved the HABS documentation.

²⁴ The full text of each mitigation measure in this initial study is located in the Mitigation Measures section below.

Project Mitigation Measure 2: Performance Measures

Qualified staff from the Port of San Francisco, who meets the Secretary of the Interior's Professional Qualification Standards in Historic Architecture or Architectural History, shall review all proposed tenant improvements and alterations for consistency with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The review of tenant improvement work by Port staff shall include an analysis of the potential impact of the work on the character-defining features of each contributing resource as detailed in the UIW Historic District National Register nomination. These evaluations shall also consider the Significance Diagrams that were prepared for each resource as a part of the prior Historic Resource Evaluation (HRE) analysis conducted for environmental review that supported the issuance of a CPE by the Planning Department in 2014 (Case No. 2013.1168E). The HRE analysis is used to determine whether proposed work would impact important features, finishes and spatial relationships that characterize a resource. This analysis and all related tax credit project approvals issued by the National Park Service would be considered by Port staff in their finding of project consistency with the Secretary's Standards. In cases of disagreement between parties as to whether the proposed construction, rehabilitation and alteration meets the Secretary's Standards Port staff shall consult with Planning Department Preservation staff, or a may seek review of the scope of work by a third party historic preservation consultant (who meets or exceeds the Secretary of the Interior's Professional Qualification Standards in Historic Architecture or Architectural History, and has demonstrated experience with maritime resources), or OHP and NPS. In cases where a final determination has been made that the Secretary's Standard are not met, the specific tenant improvement or alteration must be redesigned to meet these Standards.

Based on the preliminary conceptual architectural drawings prepared for the prior HRE analysis in support of the issuance of the CPE for the historic renovation of the core and shell of all eight contributing resources (Case No. 2013.1168E), and the conditional approval of the Rehabilitation Tax Credit application, it appears that the project has the potential to meet the Secretary's Standards. However, given the level of available information, design and performance criteria for tenant improvement scopes not previously evaluated in the prior environmental document (Case No. 2013.1168E) must be incorporated to reduce significant impacts on historic resources to a less-than-significant level. These design and performance measures include:

- The project sponsor's Historic Architect(s) for tenant improvements shall meet the Secretary of the Interior's Qualification Standards in Historic Architecture, and the Port shall utilize the Secretary of the Interior's Standards for the Treatment of Historic Properties to assess impacts on the historic resources, and will consider prior related National Park Service project approvals when evaluating specific tenant improvement proposal. In working with the project sponsor, the Port shall implement the project or an alternative that provides the greatest level of consistency with the criteria, and on balance has the least impact.
- Future tenant improvements in each of the contributing resources shall maintain the core and shell as previously evaluated in the prior environmental document (Case No. 2013.1168E) and conditionally approved by NPS as a part of the Rehabilitation Tax Credit process unless otherwise approved by the Port and Planning Department.

- Interior buildout for tenant improvements not previously evaluated in the prior environmental document (Case No. 2013.1168E) shall allow the introduction of mezzanines provided the total new floor area shall be limited to a maximum of one third of the total floor area or floor plate, whichever is less, and shall maintain historic interior volumes and character defining spatial relationships.
- Interior subdivision of floor area shall be maintained where feasible to preserve the historic volume and visual access of the interior by discouraging full height partitions and demising walls.
- Tenant improvements not previously evaluated in the prior environmental document (Case No. 2013.1168E), shall maintain existing window and door openings and their historic ingress and egress functions. The conversion or expansion of openings to serve new functions shall be discouraged and allowed only in cases where the applicant can demonstrate that alternate less impactful means to accommodate new or expanded functions were considered and determined infeasible, and the impacts to the exterior are limited to secondary elevations of the contributing resource. The installation of glazed storefront systems within existing cargo openings may be allowed provided that historic door assemblies that survive are maintained in a fixed open position.
- HVAC, photovoltaic and skylight installations may be allowed provided such installations are not highly visible within the historic district and maintain a low profile. HVAC installations shall be located within the building envelop of the contributing resource whenever possible and skylights shall be limited to a maximum of 25 percent of the total roof area of the resource. Installation of rooftop HVAC, photovoltaic and skylight improvements shall maintain the roof profile and not remove historic appurtenances that contribute to the character of the resource.
- The introduction of disabled access on the exterior and interior of contributing resources shall be done in a manner that minimizes alteration, construction and interventions, thereby protecting character defining features. For Port properties accessibility requirements are administered by the Port Harbor Engineer. Determinations about alternate means of compliance through the use of the accessibility requirements of the California Historical Building Code (CHBC) are made on a case-by-case basis and seek to protect significant historic features and materials. The project sponsors shall consult early in the design process with the Port's Chief Harbor Engineer to obtain a determination of occupancy classification for proposed uses and guidance on acceptable approaches to meet applicable accessibility requirements that are sensitive to the historical integrity of the resource.
- Building additions may be considered provided they are subordinate in scale and height to the subject resource. Additions shall be limited to no more than 25 percent of the square-footage or floor plate of the contributing resource, one story lower in height and are designed to appear to be freestanding with minimal connection to the resource. Additions shall not obscure primary elevations or character defining window or door openings of the resource.

- Signage and exterior lighting shall be addressed in a comprehensive program developed for each resource. Signage location, types, size and height maximums are addressed in the Port's Sign Policy. Port staff reviews signage involving historic resources using both the Port Sign Policy and the Secretary's Standards. Signage and lighting programs for Buildings 102, 113-114 and 115-116 will be reviewed taking into account the specific context of each resource type, location and the proposed use. Since the UIW Historic District is characterized by its former industrial past and the on-going ship repair operations simple, utilitarian non-illuminated wall and blade signs and signs that emulate historic signage are recommended, while highly designed and internally illuminated signs are not allowed.

The Pier 70 Mixed-Use District DEIR found that in consideration of past, present, and future projects, there would be a cumulative loss of 14 historic buildings that contribute to the significance of the UIW Historic District. The collective demolition of these buildings and its cumulative impact on the integrity of the UIW Historic District were analyzed in the Pier 70 Mixed-Use DEIR. The DEIR found that these demolitions would enhance the ongoing ship repair activity by allowing for additional space related to ship repair activities, that a significant concentration of World War II-era contributing features and buildings would remain in the Historic District, that the proposed demolitions would allow the existing ship repair facility to continue into the future by allowing for expanded open staging areas for ship repair, and would provide opportunities for new compatible infill development that would help support the adaptive use of the remaining contributors to the UIW Historic District. The Pier 70 Mixed-Use District DEIR included the proposed project in its cumulative analysis and identified a significant cumulative impact on historical architectural resources that are located within the UIW district; however, the DEIR found that this impact could be mitigated to a less than significant level. The HRER prepared for the proposed project determined that the proposed demolitions would result in a less than significant cumulative impact on the UIW Historic District. Therefore, the proposed project's contribution to this significant impact would be less than cumulatively considerable.

Archeological Resources

The Eastern Neighborhoods PEIR determined that implementation of the Area Plan could result in significant impacts on archeological resources and identified three mitigation measures that would reduce these potential impacts to a less than significant level. Eastern Neighborhoods PEIR Mitigation Measure J-1 applies to properties for which a final archeological research design and treatment plan is on file at the Northwest Information Center and the Planning Department. Mitigation Measure J-2 applies to properties for which no archeological assessment report has been prepared or for which the archeological documentation is incomplete or inadequate to serve as an evaluation of potential effects on archeological resources under CEQA. Mitigation Measure J-3, which applies to properties in the Mission Dolores Archeological District, requires that a specific archeological testing program be conducted by a qualified archeological consultant with expertise in California prehistoric and urban historical archeology.

No previous archeological studies have been conducted for the project site, and the site is not located within the Mission Dolores Archeological District; therefore, PEIR Mitigation Measures J-1 and J-3 do not apply to the proposed project.

Because no previous archeological studies have been prepared for the project site, PEIR Mitigation Measure J-2: Properties with No Previous Studies applies to the proposed project. Mitigation Measure J-2 requires preparation of a Preliminary Archeological Sensitivity Study to assess the potential for a

proposed project to have a significant impact on archeological resources. Accordingly, the Planning Department's archeologist conducted an archeological assessment of the project site and the proposed project.²⁵ The Preliminary Archeological Review (PAR) fulfills the requirement of a Preliminary Archeological Sensitivity Study, as called for in the PEIR Mitigation Measure J-2. The archeological mitigation requirement attached to the PAR, the Archeological Monitoring Program (AMP), is described under "Mitigation Measures", and would reduce the potential effect of the project on archeological resources. Through implementation of the AMP, an archeological consultant would determine which project construction activities may disturb any CEQA-significant archeological resources present on the project site where ground-disturbing activities would take place. If an intact archeological deposit is encountered, all soils disturbing activities in the vicinity of the deposit shall cease until the deposit is evaluated. If the ERO in consultation with the archeological consultant determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, either the project shall be re-designed so as to avoid any adverse effect on the significant archeological resource or an archeological data recovery program shall be implemented.

In compliance with Eastern Neighborhoods PEIR Mitigation Measures J-2, the project is required to implement Project Mitigation Measure 3, which includes implementation of the procedures set forth in the AMP, and would ensure that the proposed project would not cause a substantial adverse change in the significance of an archaeological resource and would not disturb any human remains, including those interred outside of formal cemeteries. Project Mitigation Measure 3 would reduce the potential effect of the project's construction on CEQA-significant archeological resources to a less-than-significant level.

For these reasons, the proposed project would not result in significant impacts on archeological resources that were not identified in the Eastern Neighborhoods PEIR. The Pier 70 Mixed-Use District DEIR identified a significant cumulative on archeological resources but found that this impact could be mitigated to a less than significant level. With implementation of Project Mitigation Measure 3, the proposed project's contribution to this cumulative impact would be less than significant.

Paleontological Resources

The proposed project would involve excavation of approximately four feet below ground surface for construction of the new addition adjacent to Building 101. Based on borings from several geotechnical investigations, the project site contains about 18 to 29 feet of fill that consists of loose gravel and stiff clay with sand.^{26,27,28} Since fill does not typically contain paleontological resources, construction of the proposed development has a low potential to yield unique paleontological resources.

For these reasons, the proposed project would not result in significant impacts on paleontological resources that were not identified in the Eastern Neighborhoods PEIR. In addition, the Pier 70 Mixed-Use District DEIR included the proposed project in its cumulative analysis and did not identify a significant

²⁵ Environmental Planning Preliminary Archeological Review: Checklist for 20th Street Historic Buildings from Allison Vanderslice, January 14, 2014.

²⁶ AGS, Inc., *Geotechnical Investigation for Mariposa Storage/Transport Facilities, San Francisco, California*, June 1989.

²⁷ Treadwell and Rollo, *Geotechnical Investigation for Pier 70, Building 113, San Francisco, California*, April 28, 2010.

²⁸ Langan Treadwell Rollo, *Geotechnical Consultation for Pier 70 Historic Building Renovations, San Francisco, California*, May 28, 2013.

cumulative impact to paleontological resources. Therefore, the proposed project would have a less than significant cumulative impact to paleontological resources.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
4. TRANSPORTATION AND CIRCULATION—Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☐	☒
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒
c) Result in a change in air traffic patterns, including either an increase in traffic levels, obstructions to flight, or a change in location, that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	☐	☐	☐	☒
e) Result in inadequate emergency access?	☐	☐	☐	☒
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒

The Eastern Neighborhoods PEIR anticipated that growth resulting from the zoning changes would not result in significant impacts related to pedestrians, bicyclists, loading, or construction traffic. The PEIR states that in general, the analyses of pedestrian, bicycle, loading, emergency access, and construction transportation impacts are specific to individual development projects, and that project-specific analyses would need to be conducted for future development projects under the Eastern Neighborhoods Rezoning and Area Plans.

The Eastern Neighborhoods PEIR anticipated that growth resulting from the zoning changes could result in significant impacts on transit ridership, and identified seven transportation mitigation measures, which are described further below in the Transit sub-section. Even with mitigation, however, it was anticipated that the significant adverse cumulative impacts on transit lines could not be reduced to a less than significant level. Thus, these impacts were found to be significant and unavoidable.

As discussed above under "Automobile Delay and Vehicle Miles Traveled," in response to state legislation that called for removing automobile delay from CEQA analysis, the Planning Commission

adopted resolution 19579 replacing automobile delay with a VMT metric for analyzing transportation impacts of a project. Therefore, impacts and mitigation measures from the Eastern Neighborhoods PEIR associated with automobile delay are not discussed in this checklist.

The Eastern Neighborhoods PEIR did not evaluate VMT or the potential for induced automobile travel. The VMT Analysis presented below evaluates the project's transportation effects using the VMT metric.

A transportation impact study (TIS) was prepared for the previous environmental review for the Pier 70: "20th Street Historic Core" project to evaluate potential project-specific effects and is summarized herein.²⁹ The changes of the project from that evaluated in the previously issued environmental document are also analyzed below.

The project site is not located within an airport land use plan area, or in the vicinity of a private airstrip. Therefore, initial study topic 4c is not applicable.

Vehicle Miles Traveled Analysis

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

Given these travel behavior factors, San Francisco has a lower VMT ratio than the nine-county San Francisco Bay Area region. In addition, some areas of the City have lower VMT ratios than other areas of the City. These areas of the City can be expressed geographically through transportation analysis zones (TAZ). Transportation analysis zones are used in transportation planning models for transportation analysis and other planning purposes. The zones vary in size from single city blocks in the downtown core, multiple blocks in outer neighborhoods, to even larger zones in historically industrial areas like the Hunters Point Shipyard.

The San Francisco County Transportation Authority (Transportation Authority) uses the San Francisco Chained Activity Model Process (SF-CHAMP) to estimate VMT by private automobiles and taxis for different land use types. Travel behavior in SF-CHAMP is calibrated based on observed behavior from the California Household Travel Survey 2010-2012, Census data regarding automobile ownership rates and county-to-county worker flows, and observed vehicle counts and transit boardings. SF-CHAMP uses a synthetic population, which is a set of individual actors that represents the Bay Area's actual population, who make simulated travel decisions for a complete day. The Transportation Authority uses tour-based analysis for office and residential uses, which examines the entire chain of trips over the course of a day, not just trips to and from the project. For retail uses, the Transportation Authority uses trip-based analysis, which counts VMT from individual trips to and from the project (as opposed to entire chain of trips). A trip-based approach, as opposed to a tour-based approach, is necessary for retail

²⁹ CHS Consulting Group, *Pier 70: 20th Street Historic Buildings Final Transportation Technical Memorandum*, February 19, 2014.

projects because a tour is likely to consist of trips stopping in multiple locations, and the summarizing of tour VMT to each location would over-estimate VMT.^{30,31}

For office development, the existing regional average daily work-related VMT per employee is 19.1. For retail development, regional average daily retail VMT per employee is 14.9.³² Average daily VMT for these land uses is projected to decrease in future 2040 cumulative conditions. Refer to Table 4: Daily Vehicle Miles Traveled, which includes the transportation analysis zone (TAZ) in which the project site is located, 559.

Table 4 - Daily Vehicle Miles Traveled

Land Use	Existing			Cumulative 2040		
	Bay Area Regional Average	Bay Area Regional Average minus 15%	TAZ 559	Bay Area Regional Average	Bay Area Regional Average minus 15%	TAZ 559
Employment (Office)	19.1	16.2	14.6	17.0	14.5	10.1
Employment (Retail)	14.9	12.6	10.8	14.6	12.4	11.9

TAZ= transportation analysis zones

A project would have a significant effect on the environment if it would cause substantial additional VMT. OPR's *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA* ("proposed transportation impact guidelines") recommends screening criteria to identify types, characteristics, or locations of projects that would not result in significant impacts to VMT. If a project meets one of the three screening criteria provided (Map-Based Screening, Small Projects, and Proximity to Transit Stations), then it is presumed that VMT impacts would be less than significant for the project and a detailed VMT analysis is not required. Map-Based Screening is used to determine if a project site is located within a TAZ that exhibits low levels of VMT; Small Projects are projects that would generate fewer than 100 vehicle trips per day; and the Proximity to Transit Stations criterion includes projects that are within a half mile of an existing major transit stop, have a floor area ratio of greater than or equal to

³⁰ To state another way: a tour-based assessment of VMT at a retail site would consider the VMT for all trips in the tour, for any tour with a stop at the retail site. If a single tour stops at two retail locations, for example, a coffee shop on the way to work and a restaurant on the way back home, then both retail locations would be allotted the total tour VMT. A trip-based approach allows us to apportion all retail-related VMT to retail sites without double-counting.

³¹ San Francisco Planning Department, Executive Summary: Resolution Modifying Transportation Impact Analysis, Appendix F, Attachment A, March 3, 2016.

³² Retail travel is not explicitly captured in SF-CHAMP, rather, there is a generic "Other" purpose which includes retail shopping, medical appointments, visiting friends or family, and all other non-work, non-school tours. The retail efficiency metric captures all of the "Other" purpose travel generated by Bay Area households. The denominator of employment (including retail; cultural, institutional, and educational; and medical employment; school enrollment, and number of households) represents the size, or attraction, of the zone for this type of "Other" purpose travel.

0.75, vehicle parking that is less than or equal to that required or allowed by the Planning Code without conditional use authorization, and are consistent with the applicable Sustainable Communities Strategy.

Vehicle Miles Traveled Analysis – Office

PDR and light industrial are considered office uses because of their similar operating characteristics. As mentioned in Table 3 above, existing average daily VMT per office employee is 14.6 for TAZ 559. This is 76 percent below the existing regional average daily VMT per capita of 19.1. Given the project site is located in an area where existing VMT per office employee is more than 15 percent below the existing regional average, the proposed project's PDR and industrial uses would not result in substantial additional VMT and impacts would be less-than-significant. Furthermore, the project site meets the Proximity to Transit Stations screening criterion, which also indicates the proposed project's PDR and industrial uses would not cause substantial additional VMT.³³

Vehicle Miles Traveled Analysis – Retail

Restaurant uses are considered retail because of its similar operating characteristics. As mentioned in Table 3 above, existing average daily VMT per retail employee is 10.8 for TAZ 559. This is 72 percent below the existing regional average daily VMT per capita of 14.9. Given the project site is located in an area where existing VMT per retail employee is more than 15 percent below the existing regional average, the proposed project's restaurant and retail uses would not result in substantial additional VMT and impacts would be less-than-significant. Furthermore, the project site meets the Proximity to Transit Stations screening criterion, which also indicates the proposed project's restaurant and retail uses would not cause substantial additional VMT.³⁴

Therefore, the proposed project would not cause substantial additional VMT and impacts would be less-than-significant impact.

Trip Generation

Implementation of the proposed project would result in the renovation and reuse of the 20th Street Historic Core Buildings on Pier 70, including reuse of up to one residential unit and approximately 266,000 sf of PDR/light industrial use, 45,000 sf of office use, 24,000 sf of restaurant use, and 3,000 sf of retail use. The proposed project would provide 33 Class 1 and 30 Class 2 bicycle parking spaces. The proposed project includes 278 net new off-street parking spaces.

Localized trip generation of the proposed project was calculated using a trip-based analysis and information in the 2002 *Transportation Impacts Analysis Guidelines for Environmental Review* (SF Guidelines) developed by the San Francisco Planning Department.³⁵ The proposed project would generate an estimated 9,679 person trips (inbound and outbound) on a weekday daily basis, consisting of 6,095 person trips by auto (3,482 vehicle trips accounting for vehicle occupancy data for this Census Tract), 1,567 transit trips, 1,585 walk trips and 432 trips by other modes. During the p.m. peak hour, the

33 San Francisco Planning Department. Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis for Illinois and 20th Streets/Pier 70 ("20th Street Historic Core"), December 28, 2016.

34 Ibid.

35 San Francisco Planning Department, Transportation Calculations for Pier 70-Orton ("Historic Core"), January 10, 2017.

proposed project would generate an estimated 843 person trips, consisting of 563 person trips by auto (376 vehicle trips accounting for vehicle occupancy data for this Census Tract), 139 transit trips, 116 walk trips, and 25 trips by other modes.

The proposed project includes open space elements that would likely have special events ranging from approximately 500 to 750 people approximately eight times per month and up to approximately 5,000 people approximately once per month. Travel demand for typical events could result in 1,000 to 1,500 person trips (one trip to the event and one trip leaving the event for each attendee) while large events could result in up to 10,000 persons trips. Because these events would be relatively infrequent and unlikely to occur during the typical weekday peak hours, they are not included in the travel demand calculations. However, the standard Transportation Demand Management (TDM) measures that are part of the proposed project's TDM Plan would remain in place during events, and would serve to reduce the severity of effects on area transportation.

Transit

Mitigation Measures E-5 through E-11 in the Eastern Neighborhoods PEIR were adopted as part of the Plan with uncertain feasibility to address significant transit impacts. These measures are not applicable to the proposed project, as they are plan-level mitigations to be implemented by City and County agencies. In compliance with a portion of Mitigation Measure E-5: Enhanced Transit Funding, the City adopted impact fees for development in Eastern Neighborhoods that goes towards funding transit and complete streets. In addition, San Francisco Board of Supervisors approved amendments to the San Francisco Planning Code, referred to as the Transportation Sustainability Fee (Ordinance 200-154, effective December 25, 2015).³⁶ The fee updated, expanded, and replaced the prior Transit Impact Development Fee, which is in compliance with portions of Mitigation Measure E-5: Enhanced Transit Funding. In compliance with a portion of Mitigation Measure E-11: Transportation Demand Management, the city adopted a comprehensive Transportation Demand Management Program for most new development citywide (Ordinance 34-17, effective March 19, 2017). Both the Transportation Sustainability Fee and the transportation demand management efforts are part of the Transportation Sustainability Program.³⁷ In compliance with all or portions of Mitigation Measure E-6: Transit Corridor Improvements, Mitigation Measure E-7: Transit Accessibility, Mitigation Measure E-9: Rider Improvements, and Mitigation Measure E-10: Transit Enhancement, the SFMTA is implementing the Transit Effectiveness Project (TEP), which was approved by the SFMTA Board of Directors in March 2014. The TEP (now called Muni Forward) includes system-wide review, evaluation, and recommendations to improve service and increase transportation efficiency. Examples of transit priority and pedestrian safety improvements within the Eastern Neighborhoods Plan area as part of Muni Forward include the 14 Mission Rapid Transit Project, the 22 Fillmore Extension along 16th Street to Mission Bay (expected construction between 2017 and 2020), and the Travel Time Reduction Project on Route 9 San Bruno (initiation in 2015). In addition, Muni Forward includes service improvements to various routes within the Eastern Neighborhoods Plan area; for instance the implemented new Route 55 on 16th Street.

³⁶ Two additional files were created at the Board of Supervisors for TSF regarding hospitals and health services, grandfathering, and additional fees for larger projects: see Board file nos. 151121 and 151257.

³⁷ <http://tsp.sfplanning.org>

Mitigation Measure E-7 also identifies implementing recommendations of the Bicycle Plan and Better Streets Plan. As part of the San Francisco Bicycle Plan, adopted in 2009, a series of minor, near-term, and long-term bicycle facility improvements are planned within the Eastern Neighborhoods, including along 2nd Street, 5th Street, 17th Street, Townsend Street, Illinois Street, and Cesar Chavez Boulevard. The San Francisco Better Streets Plan, adopted in 2010, describes a vision for the future of San Francisco's pedestrian realm and calls for streets that work for all users. The Better Streets Plan requirements were codified in Section 138.1 of the Planning Code and new projects constructed in the Eastern Neighborhoods Plan area are subject to varying requirements, dependent on project size. Another effort which addresses transit accessibility, Vision Zero, was adopted by various City agencies in 2014. Vision Zero focuses on building better and safer streets through education, evaluation, enforcement, and engineering. The goal is to eliminate all traffic fatalities by 2024. Vision Zero projects within the Eastern Neighborhoods Plan area include pedestrian intersection treatments along Mission Street from 18th to 23rd streets, the Potrero Avenue Streetscape Project from Division to Cesar Chavez streets, and the Howard Street Pilot Project, which includes pedestrian intersection treatments from 4th to 6th streets.

The project site is located within a quarter mile of several local transit lines including Muni lines 14X-Mission Express, 22-Fillmore, 48-Quintara, the KT-Ingleside/Third Street. The proposed project would be expected to generate 1,567 daily transit trips, including 139 during the p.m. peak hour. Given the wide availability of nearby transit, the addition of 139 p.m. peak hour transit trips would be accommodated by existing capacity. As such, the proposed project would not result in unacceptable levels of transit service or cause a substantial increase in delays or operating costs such that significant adverse impacts in transit service could result.³⁸

As stated above, the proposed project includes open space elements that would likely have special events ranging from approximately 500 to 750 people approximately eight times per month and up to approximately 5,000 people approximately once per month. Because these events would be relatively infrequent and unlikely to occur during the typical weekday peak hours, transit trips associated with events at the project site are not anticipated to result in significant adverse impacts on transit service.

Each of the rezoning options in the Eastern Neighborhoods PEIR identified significant and unavoidable cumulative impacts relating to increases in transit ridership on Muni lines, with the Preferred Project having significant impacts on seven lines. Of those lines, the project site is located within a quarter-mile of Muni lines 22-Fillmore and 48-Quintara. The proposed project would not contribute considerably to these conditions as its minor contribution of 139 p.m. peak hour transit trips would not be a substantial proportion of the overall additional transit volume generated by Eastern Neighborhood projects. The proposed project would also not contribute considerably to 2040 cumulative transit conditions and thus would not result in any significant cumulative transit impacts.

Pedestrian

Pedestrian volumes are currently very low within the project site since the site is currently vacant. At present, sidewalks in the project vicinity are generally between nine and twelve feet wide. The sidewalks within the project site (along 20th Street, east of Illinois Street) are generally in poor condition (e.g., cracked and uneven surfaces).

³⁸ CHS Consulting Group, *Pier 70: 20th Street Historic Buildings Final Transportation Technical Memorandum*, February 19, 2014.

The proposed project would generate about 255 new pedestrian trips (139 transit and 116 walk) during the weekday p.m. peak hour. The Port would evaluate the structural condition of the sidewalks within the project site and would repair sidewalks accordingly. The proposed project would enhance pedestrian connectivity within the project site through the construction of new eight-foot-wide sidewalks along the west side of Michigan Street, and new crosswalks at the intersection of 20th Street and Georgia Street, for better connectivity between the buildings along the north and south sides of 20th Street. In addition, the proposed project would not install any street trees or street furniture that would reduce the available walkway along existing and new sidewalks. Although the proposed project would result in an increase in the number of vehicles in the vicinity of the project site this increase, coupled with the pedestrian improvements described above, would not be substantial enough to create potentially hazardous conditions for pedestrians or otherwise substantially interfere with pedestrian accessibility to the site and adjoining areas. Therefore, the proposed project would not result in significant impacts that were not identified in the Eastern Neighborhoods FEIR related to pedestrians.

As described below in "Loading", the proposed project would require loading activities to occur within designated loading zones throughout the project site. These loading zones would accommodate deliveries from various vehicles, including trucks which may range from small vans (16-feet long) to tractor-trailers (between 53-feet and 74-feet long). No loading activities would occur at or near pedestrian facilities (e.g., sidewalks, crosswalks, or Americans with Disabilities ramps). Because the proposed project would establish designated loading zones that would not interfere with pedestrian facilities or inhibit pedestrian access and circulation to each building or parking area, potential conflicts between pedestrian and freight/delivery vehicles would be substantially reduced and/or avoided. Overall, the proposed project's effects on pedestrian circulation and access would be less than significant.

While pedestrian-related impacts would be less than significant, improvement measures could be implemented to further reduce these less-than-significant impacts. As stated in the Improvement Measures section below, implementation of Project Improvement Measure 1: Develop Additional Pedestrian and Roadway Treatments would reduce potential conflicts between pedestrians and freight vehicles within the project site and Project Improvement Measure 10: Event-Related Transportation Demand Management would address secondary effects on pedestrian circulation along Illinois and 20th streets as a result of event-related activities.

Bicycle

The proposed project would provide 33 Class 1 bicycle parking spaces and 30 Class 2 bicycle parking spaces. The project site is within a convenient bicycling distance of office, retail, and restaurant uses in neighboring areas (e.g., Mission, Mission Bay, Potrero Hill, Dogpatch, and South of Market). There are three designated bicycle routes in proximity to the project site (i.e., Route 5 on Illinois Street, Route 7 on Indiana Street, and Route 23 on Mariposa Street). Therefore, it is anticipated that a portion of the 25 "other" p.m. peak hour trips generated by the proposed project would be bicycle trips. The bicycle routes located along Illinois, Indiana, and Mariposa Streets are conveniently located adjacent to and near the project site and these routes provide direct connectivity to several bicycle routes throughout the area and provide linkage to other neighborhoods and areas of the City. With the current bicycle and traffic volumes on the adjacent streets, bicycle travel generally occurs without major impedances or safety problems.

Given the existing bicycle network within the project vicinity, it is reasonable to assume that the anticipated increase in bicyclists associated with the proposed project would be accommodated by existing bicycle network facilities. The proposed project would not introduce any design features that would eliminate or impede access to existing bicycle routes in proximity to the project site. It is noted that although the proposed project would result in an increase in the number of vehicles in the vicinity of the project site, this anticipated increase would not be substantial enough to create potentially hazardous conditions for bicyclists or otherwise substantially interfere with bicycle accessibility to the site and adjoining areas since the project would not create new curb cuts or vehicular access points along bicycle routes. Therefore, the proposed project would have a less-than-significant bicycle impact.

While bicycle-related impacts would be less than significant, Project Improvement Measure 2: Designate Safe, Accessible, and Convenient Bicycle Parking could be implemented to further reduce these less-than-significant impacts. This would ensure that bicycle parking within the project site is safe, accessible, and convenient for users and that the location of bicycle parking in designated areas would not result in any potential conflicts with other vehicles. Additionally, Project Improvement Measure 10: Event-Related Transportation Demand Management would address secondary effects on bicycle circulation along Illinois and 20th streets as a result of event-related activities.

Loading

The provision of on-street loading spaces along roadways within the project site would be subject to Port approval and may also require approvals and/or review by SFMTA, as appropriate. As part of the proposed project, Louisiana Street would be widened from approximately 20 to 58 feet wide to provide truck access from 20th Street to the southern portion of the 20th Street Historic Core. The western side of Louisiana Street would provide a truck staging and loading area to serve the proposed project. An existing concrete slab on the western side of Building 113 would be modified to serve as a loading dock or removed entirely to serve as an at-grade loading area. Five new loading docks along the western side of Buildings 113/114 and 115/116 would also be created to provide loading for these buildings.

The proposed project would generate a demand for approximately five spaces during average hours of loading activities and approximately seven spaces during the peak hours of loading activities. It is anticipated that the delivery/service vehicles that would be generated by the proposed project would vary in size, ranging from small trucks (16- to 26-foot long trucks) to tractor-trailers, typically 53 feet in length or longer (up to 74 feet in length). Based on these estimates, the average loading hour demand and peak hour loading demand could be expected to exceed the proposed supply of five off-street loading spaces; however, daily and peak hour loading demand may be accommodated through use of both off-street and on-street spaces (at designated loading docks and proposed loading spaces along 20th Street), as discussed below.

Future tenants of the proposed project would range from restaurant uses to office and PDR/light industrial uses and the delivery vehicles associated with these uses are typically small trucks (e.g., UPS, FedEx, food distribution). Such vehicles could be accommodated either in the on-site parking lots or on the street. Therefore, the anticipated unmet peak hour freight/delivery demand would likely be absorbed within the parking lots and along designated loading spaces along 20th Street. Therefore, the proposed project would not result in potential adverse effects to loading conditions within the project site.

The project-related off-street loading supply deficit could potentially result in delivery vehicle circulation, extended wait times, queuing, and/or double parking of freight/delivery vehicles. However, anticipated delays to existing traffic conditions in and around the project site would be minimal. This is because freight/delivery would include a range of vehicle sizes most of which could be accommodated in parking areas along 20th Street. In addition, loading activities would occur during varying scheduled and coordinated times throughout the day. Therefore, loading impacts would be less than significant.

While loading-related impacts would be less than significant, Project Improvement Measure 3: Designate Loading Dock Manager and Project Improvement Measure 4: Require Traffic Controllers/Flaggers for Larger Deliveries, could be implemented to further reduce these less-than-significant impacts and address any potentially hazardous conditions posed by delivery vehicles to traffic, pedestrians, and other users of streets internal to the proposed project. The improvement measures should they be adopted, would require future tenants to designate a loading dock manager(s) to assist in the scheduling and coordination of deliveries, which would minimize potential queuing effects and unsafe traffic conditions.

Emergency Access

The proposed project would not change the travel lanes along Illinois or 20th streets, and emergency vehicle access to the project site would remain unchanged from existing conditions. Implementation of the proposed project would not result in inadequate emergency vehicle access, and this impact would be less than significant. To ensure that emergency vehicle access is maintained during special events, Project Improvement Measure 10 would require the sponsor to participate in the Mission Bay Ballpark Transportation Coordination Committee (MBBTCC) to discuss scheduling overlaps and to ensure that plans for traffic management during events account for additional traffic associated with large events (approximately 1,000 to more attendees) at the project site. Improvement Measure 10 would further reduce this less-than-significant impact.

Construction

Construction activities are anticipated to take place over a period of approximately 18 to 24 months. Construction staging areas would be located on site or on adjacent Port property, primarily within the northern parking lot, the courtyard area, and along Michigan Street. These staging areas would accommodate construction equipment and machinery as well as parking for construction worker vehicles. No permanent or temporary roadway closures along Illinois, Georgia, and 20th Streets would be required during construction. Occasional road closures or use of parking lanes on 20th and Illinois Streets between 19th and 20th may be required. However, if it is determined that temporary traffic lane closures would be needed, such actions would be coordinated with the City in order to minimize the impacts on local traffic. In general, lane and sidewalk closures are subject to review and approval by the Port, Public Works, and SFMTA. Because there are no Muni bus stops along the project site frontage, it is not anticipated that any Muni bus stops would need to be relocated during construction of the proposed project.

Construction truck traffic could result in minor congestion and conflicts with vehicles, transit, pedestrians, and bicyclists. Potential impacts would be considered less-than-significant due to their temporary and limited duration and due to the fact that the majority of construction activity would occur during off-peak hours, when traffic volumes are minimal and potential for conflicts is low.

The construction contractor would be required to meet the City of San Francisco's Regulations for Working in San Francisco Streets (the "Blue Book") and would be required to meet with SFMTA and other responsible City agencies to determine feasible traffic management and improvement measures to reduce traffic congestion during construction of this project taking into account other nearby projects (e.g., Pier 70 Mixed-Use District and Crane Cove Park). The specific provisions of the building permit would address issues of circulation, safety, or parking, as developed in a meeting of the Transportation Advisory Staff Committee (TASC) attended by the project sponsor and representatives of the Port and City departments, including Parking and Traffic, Police, Public Works, and SFMTA Muni Operations. Therefore, construction-related impacts would be less than significant and would not result in significant impacts on transportation that were not identified in the Eastern Neighborhoods FEIR.

While construction related impacts would be less than significant, Project Improvement Measure 5: Limit Peak Hour Truck Movements, Project Improvement Measure 6: Develop Construction Management Plan, Project Improvement Measure 7: Encourage Transit Access for Construction Workers and Project Improvement Measure 8: Provide Project Construction Updates could be implemented to further reduce these less-than-significant impacts. These improvement measures would allow the project sponsor to further develop a construction management plan to minimize conflicts with all modes of travel, to develop a public information program for nearby residences and businesses, to limit truck delivery hours, and to reduce construction worker parking demand by developing methods to encourage carpooling and transit use.

Conclusion

For the above reasons, the proposed project would not result in significant impacts that were not identified in the Eastern Neighborhoods PEIR related to transportation and circulation and would not contribute considerably to cumulative transportation and circulation impacts that were identified in the Eastern Neighborhoods PEIR.

The Pier 70 Mixed-Use District DEIR included the proposed project in its cumulative analysis and did not identify a significant cumulative impact related to VMT, traffic hazards, pedestrians, bicycles, loading, and construction. Therefore, the proposed project's cumulative impact on VMT, traffic hazards, pedestrians, bicycles, loading, and construction would be less than significant. The DEIR identified a significant and unavoidable cumulative transit impact on the 48-Quintara/24th Street and 22-Fillmore bus routes. The Pier 70 Mixed-Use District development is anticipated to add approximately 2,365 to 2,893 p.m. peak hour transit trips while the proposed project would add approximately 139 p.m. peak hour transit trips. The proposed project's contribution to this significant cumulative transit impact would not be cumulatively considerable.

Topics:	Significant Impact Peculiar to Project or Project Site	Significant Impact not Identified in PEIR	Significant Impact due to Substantial New Information	No Significant Impact not Previously Identified in PEIR
5. NOISE—Would the project:				
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☒
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	☐	☐	☐	☒
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
g) Be substantially affected by existing noise levels?	☐	☐	☐	☒

The Eastern Neighborhoods PEIR determined that implementation of the Eastern Neighborhoods Area Plans and Rezoning would result in significant noise impacts during construction activities and due to conflicts between noise-sensitive uses in proximity to noisy uses such as PDR, retail, entertainment, cultural/institutional/educational uses, and office uses. The Eastern Neighborhoods PEIR also determined that incremental increases in traffic-related noise attributable to implementation of the Eastern Neighborhoods Area Plans and Rezoning would be less than significant. The Eastern Neighborhoods PEIR identified six noise mitigation measures, three of which may be applicable to subsequent development projects.³⁹ These mitigation measures would reduce noise impacts from construction and noisy land uses to less-than-significant levels.

³⁹ Eastern Neighborhoods PEIR Mitigation Measures F-3, F-4, and F-6 address the siting of sensitive land uses in noisy environments. In a decision issued on December 17, 2015, the California Supreme Court held that CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed project's future users or residents except where a project or its residents may exacerbate existing environmental hazards (*California Building Industry Association v. Bay Area Air Quality Management District*, December 17, 2015, Case No. S213478. Available at: <http://www.courts.ca.gov/opinions/documents/S213478.PDF>). As noted above, the *Eastern Neighborhoods PEIR* determined that incremental increases in traffic-related noise attributable to implementation of the Eastern Neighborhoods Area Plans and Rezoning would be less than significant, and thus would not exacerbate the existing noise environment. Therefore, Eastern Neighborhoods Mitigation Measures F-3, F-4, and F-6 are not applicable. Nonetheless, for all noise sensitive uses, the general requirements for adequate

Construction Noise

Eastern Neighborhoods PEIR Mitigation Measures F-1 and F-2 relate to construction noise. Mitigation Measure F-1 addresses individual projects that include pile-driving, and Mitigation Measure F-2 addresses individual projects that include particularly noisy construction procedures (including pile-driving). The proposed project would not include pile driving, and therefore Mitigation Measure F-1 is not applicable. However, since the project would involve noisy construction methods related to new exterior construction and demolition work and the nearest noise sensitive receptors are located approximately 60 feet from the project site, Mitigation Measure F-2 is applicable. PEIR Mitigation Measure F-2 would reduce construction noise by requiring the sponsor to develop and implement a set of noise attenuation measures under the supervision of a qualified acoustical consultant. The project sponsor has agreed to implement Eastern Neighborhoods PEIR Mitigation Measure F-2 as Project Mitigation Measure 4.

In addition, all construction activities for the proposed project (approximately 18 to 24 months) would be subject to the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code) (Noise Ordinance). Construction noise is regulated by the Noise Ordinance. The Noise Ordinance requires construction work to be conducted in the following manner: (1) noise levels of construction equipment, other than impact tools, must not exceed 80 dBA at a distance of 100 feet from the source (the equipment generating the noise); (2) impact tools must have intake and exhaust mufflers that are approved by the Director of Public Works to best accomplish maximum noise reduction; and (3) if the noise from the construction work would exceed the ambient noise levels at the site property line by 5 dBA, the work must not be conducted between 8:00 p.m. and 7:00 a.m. unless the Director of Public Works authorizes a special permit for conducting the work during that period.

DBI is responsible for enforcing the Noise Ordinance for private construction projects during normal business hours (8:00 a.m. to 5:00 p.m.). The Police Department is responsible for enforcing the Noise Ordinance during all other hours. Nonetheless, during the construction period for the proposed project, approximately 18 to 24 months, occupants of the nearby properties could be disturbed by construction noise. Times may occur when noise could interfere with indoor activities in nearby residences and other businesses near the project site. The increase in noise in the project area during project construction would not be considered a significant impact of the proposed project, because the construction noise would be temporary, intermittent, and restricted in occurrence and level, as the contractor would be required to comply with the Noise Ordinance and Project Mitigation Measure 4, which would reduce construction noise impacts to a less-than-significant level. In addition, the Pier 70 Mixed-Use District DEIR included the proposed project in its cumulative analysis and did not identify a significant cumulative impact related to construction noise. Therefore, the proposed project's cumulative impact on construction noise would be less than significant.

Operational Noise

Eastern Neighborhoods PEIR Mitigation Measure F-5 addresses impacts related to individual projects that include uses that would be expected to generate noise levels in excess of ambient noise in the project vicinity. The proposed project includes uses that could be considered noise-generating uses, depending

interior noise levels of Mitigation Measures F-3 and F-4 are met by compliance with the acoustical standards required under the California Building Standards Code (California Code of Regulations Title 24). Nevertheless, the project does not propose new uses that would accommodate sensitive noise receptors.

on the ultimate occupant/tenant of the space. PEIR Mitigation Measure F-5 requires individual projects that include new noise-generating uses that would be expected to generate noise levels in excess of ambient noise in the proposed project site vicinity to submit an acoustical analysis that demonstrates the proposed use would comply with the General Plan and the Noise Ordinance. The Noise Ordinance does not allow for a noise level more than eight dBA above the local ambient at any point outside of the property plane for commercial properties and states that no fixed noise source may cause the noise level measured inside any sleeping or living room in any dwelling unit located on residential property to exceed 55 dBA between the hours of 7 a.m. and 10 p.m. with windows open, or 45 dBA between the hours of 10 p.m. and 7 a.m. Typical residential building construction generally provides exterior-to-interior noise level reduction performance of no less than 15 dB from the building façade when exterior windows are open.

The project site is located within the vicinity of residential uses and the proposed project would generate new sources of noise, primarily from mechanical equipment on the buildings and from future light industrial and PDR tenants that occupy the buildings. Therefore, pursuant to Mitigation Measure F-5, a site survey and noise measurements were conducted to demonstrate that the proposed project would comply with the General Plan and the Noise Ordinance.⁴⁰ The noise report identifies sensitive receptors located within 900 feet of the project site, the closest being the residential building at 820 Illinois Street, approximately 60 feet from the project site. The report notes that ambient noise level at the project site was between 61 and 64 dBA between 7:00 a.m. and 10:00 p.m. The noise study also demonstrates that the maximum noise levels from the proposed project must not exceed 69 dBA at the 820 Illinois Street residential development between 7:00 a.m. and 10:00 p.m., and above 55 dBA between 7:00 a.m. and 10:00 p.m. within the adjacent residences. The report concludes that rooftop equipment noise can be designed to meet the requirements of the Noise Ordinance and that this equipment would be minimal since the project site contains historic buildings. Thus, operational noise associated with outdoor mechanical equipment would not adversely affect nearby sensitive receptors.

Since not all tenants have been identified, PEIR Mitigation Measure F-5 would apply to future noise-generating tenants to ensure compliance with the General Plan and the Noise Ordinance. Implementation of PEIR Mitigation Measure F-5 would require each noise-generating tenant to submit an acoustical study that demonstrates that noise from all activities at each building would not be more than 8 dBA above the local ambient noise level at any point outside of the property plane, and that no fixed noise source may cause the noise level measured inside any sleeping or living room in any dwelling unit located on a residential property to exceed 45 dBA between the hours of 10:00 p.m. to 7:00 a.m. or 55 dBA between the hours of 7:00 a.m. to 10:00 p.m. with windows open except where building ventilation is achieved through mechanical systems that allow windows to remain closed. The project sponsor has agreed to implement Eastern Neighborhoods PEIR Mitigation Measure F-5 as Project Mitigation Measure 5.

Additionally, the project proposes up to 100 events annually in the atrium and plaza consistent with the rules and regulations set forth by Orton Development (ODI) Master Lease Agreement with the Port.^{41,42}

⁴⁰ Vibro-Acoustic Consultants, *Pier 70 Historic Buildings Noise Study*, January 6, 2014.

⁴¹ Exhibit J: Rules and Regulation Related to Atrium and Plaza Use of the Master Lease Agreement.

⁴² Public events with no admission charge and no restriction of public access (e.g., farmers markets, craft fairs and free concerts), events that occur after public hours, or events that do not restrict public access and last less than three hours and occupy less than 15,000 square feet do not count against the 100 event annual cap.

Examples of public events that would not require the plaza/atrium closure would include farmers market, craft fair, and free concerts. Examples of public events that would require partial plaza/atrium closure would include ticketed concerts, ice rink, and fair/festivals with an admissions charge. Examples of events that would require the entire plaza closure would include ticketed concerts, fair/festivals, corporate events, and galas. Depending on the size of the event, approximately 100 to 5,000 attendees would be anticipated.

These types of events would pose the potential for nearby residents to be disturbed or annoyed by noise from the outdoor events. The potential noise conflicts would be greatest where amplified sound systems would be used and/or events occur during the more noise-sensitive late evening/nighttime hours when sleep disturbance could occur. Section 1060.1 of the Police Code requires a permit to conduct, operate, or maintain a place of entertainment, limited live performance locale or one-time event within the City and County of San Francisco. Concerts in the plaza would require the promoter to obtain a Limited Live Performance Permit from the San Francisco Entertainment Commission. This permit process requires a public hearing and includes a requirement for neighborhood outreach. Article 1, Section 47.2 of the Police Code, while generally focused on truck-mounted amplification equipment, regulates the use of any sound amplifying equipment, whether truck-mounted or otherwise. Hours of operation are restricted to between 9:00 a.m. and 10:00 p.m., unless permitted by the San Francisco Entertainment Commission.

Due to uncertainties as to the nature and extent of future outdoor events at the project site, the use of amplified sound equipment could still have the potential for significant noise impacts to nearby sensitive receptors in excess of standards established in the San Francisco General Plan or San Francisco Noise Ordinance. Implementation of Eastern Neighborhoods PEIR Mitigation Measure F-5 as Project Mitigation Measure 6: Noise Control Plan for Outdoor Amplified Sound would ensure that sound levels generated by amplified equipment would be consistent with Section 2909 of the City's Police Code, which establishes a not-to-exceed (except through a variance) noise standard for fixed sources of noise and from events subject to regulation by the Entertainment Commission. Event noise generated from a public property would be limited to 10 dBA above the local ambient at a distance of 25 feet or more; event noise generated from a commercial property would be limited to 8 dBA above the local ambient at any point outside the property plane. In addition, compliance with Section 2909(d) would limit noise from outdoor activities in residential interiors to 45 dBA between 10:00 p.m. and 7:00 a.m. or 55 dBA between 7:00 a.m. and 10:00 p.m. with windows open. Any variance to these limits granted pursuant to Section 2910 of the Police Code could only be approved through the Entertainment Commission hearing process required by Section 1060.1 of the Police Code.

Therefore, with implementation of Eastern Neighborhoods PEIR Mitigation Measure F-5 as Project Mitigation Measure 6: Noise Control Plan for Outdoor Amplified Sound, and compliance with Sections 47.2, 1060.1 and 2909 of the Police Code, periodic and temporary noise increases associated with special events would be less than significant.

The proposed project would be subject to the following interior noise standards, which are described for informational purposes. The California Building Standards Code (Title 24) establishes uniform noise insulation standards. The acoustical requirements of Title 24 are incorporated into the San Francisco Green Building Code. Title 24 allows the project sponsor to choose between a prescriptive or performance-based acoustical requirement for non-residential uses. Both compliance methods require wall, floor/ceiling, and window assemblies to meet certain sound transmission class or outdoor-indoor sound transmission class ratings to ensure that adequate interior noise standards are achieved. In

compliance with Title 24, the Port would review the final building plans to ensure that the building wall, floor/ceiling, and window assemblies meet Title 24 acoustical requirements. If determined necessary by the Port, a detailed acoustical analysis of the exterior wall and window assemblies may be required.

The project site is not located within an airport land use plan area, within two miles of a public airport, or in the vicinity of a private airstrip. Therefore, topics 12e and 12f from the CEQA Guidelines, Appendix G are not applicable.

The Pier 70 Mixed-Use District DEIR found that operation of the Pier 70 Mixed-Use District development, in combination with other cumulative development, would cause a substantial permanent increase in ambient noise levels due to traffic noise increases. The Pier 70 Mixed-Use District development is anticipated to add approximately 31,016 to 34,790 daily vehicle trips while the proposed project would add approximately 3,482 daily vehicle trips. Therefore, the proposed project's contribution to this significant cumulative impact would not be cumulatively considerable.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
6. AIR QUALITY—Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☐	☒
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☐	☒
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒

The Eastern Neighborhoods PEIR identified potentially significant air quality impacts resulting from construction activities and impacts to sensitive land uses⁴³ as a result of exposure to elevated levels of diesel particulate matter (DPM) and other toxic air contaminants (TAC). The Eastern Neighborhoods PEIR identified four mitigation measures that would reduce these air quality impacts to less-than-significant levels and stated that with implementation of identified mitigation measures, the Area Plan would be consistent with the Bay Area 2005 Ozone Strategy, the applicable air quality plan at that time. All other air quality impacts were found to be less than significant.

⁴³ The Bay Area Air Quality Management District (BAAQMD) considers sensitive receptors as: children, adults or seniors occupying or residing in: 1) residential dwellings, including apartments, houses, condominiums, 2) schools, colleges, and universities, 3) daycares, 4) hospitals, and 5) senior care facilities. BAAQMD, Recommended Methods for Screening and Modeling Local Risks and Hazards, May 2011, page 12.

Eastern Neighborhoods PEIR Mitigation Measure G-1 addresses air quality impacts during construction, and PEIR Mitigation Measures G-3 and G-4 address proposed uses that would emit DPM and other TACs.⁴⁴

Construction Dust Control

Eastern Neighborhoods PEIR Mitigation Measure G-1 Construction Air Quality requires individual projects involving construction activities to include dust control measures and to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants. The San Francisco Board of Supervisors subsequently approved a series of amendments to the San Francisco Building and Health Codes, generally referred to as the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008). The intent of the Construction Dust Control Ordinance is to reduce the quantity of fugitive dust generated during site preparation, demolition, and construction work in order to protect the health of the general public and of on-site workers, minimize public nuisance complaints, and to avoid orders to stop work by the Port. Project-related construction activities would result in construction dust, primarily from ground-disturbing activities related to the 10,000 square feet of ground disturbance for the construction of the Building 101 addition. Since the project site is under the jurisdiction of the Port, Section 1247 of Article 22B of the Public Health Code requires that all city agencies that authorize construction or other improvements on City property adopt rules and regulations to ensure that the dust control requirements of Article 22B are followed.

The regulations and procedures set forth by the San Francisco Dust Control Ordinance would ensure that construction dust impacts would not be significant. These requirements supersede the dust control provisions of PEIR Mitigation Measure G-1. Therefore, the portion of PEIR Mitigation Measure G-1 Construction Air Quality that addresses dust control is no longer applicable to the proposed project.

Criteria Air Pollutants

While the Eastern Neighborhoods PEIR determined that at a program-level the Eastern Neighborhoods Rezoning and Area Plans would not result in significant regional air quality impacts, the PEIR states that "Individual development projects undertaken in the future pursuant to the new zoning and area plans would be subject to a significance determination based on the BAAQMD's quantitative thresholds for individual projects."⁴⁵ The BAAQMD's *CEQA Air Quality Guidelines* (Air Quality Guidelines) provide screening criteria⁴⁶ for determining whether a project's criteria air pollutant emissions would violate an air quality standard, contribute to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants. Pursuant to the Air Quality Guidelines, projects that meet the screening criteria do not have a significant impact related to criteria air pollutants. The project involves the renovation of ten buildings resulting in the addition of 69,000 square feet of new building space, primarily in interior mezzanines, and the construction of an approximately 9,000-square-foot commercial building. In total the mixed-use development includes 266,000 square feet of industrial use,

⁴⁴ The Eastern Neighborhoods PEIR also includes Mitigation Measure G-2, which has been superseded by Health Code Article 38, as discussed below, and is no longer applicable.

⁴⁵ San Francisco Planning Department, Eastern Neighborhood's Rezoning and Area Plans Final Environmental Impact Report. See page 346. Available online at: <http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=4003>. Accessed June 4, 2014.

⁴⁶ Bay Area Air Quality Management District, CEQA Air Quality Guidelines, updated May 2011. See pp. 3-2 to 3-3.

45,000 square feet of office use, and 27,000 square feet of commercial use, which would collectively meet the criteria air pollutant screening size for operation.⁴⁷ In addition, construction of the 9,000-square-foot commercial building would meet the criteria pollutant screening size for construction.⁴⁸ Therefore, the project would not have a significant impact related to criteria air pollutants, and a detailed air quality assessment is not required.

Since the proposed project is below the criteria air pollutant screening levels, as stated above, the project's contribution to this air quality impact would be less than significant.

Health Risk

Since certification of the PEIR, San Francisco Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes, generally referred to as the Enhanced Ventilation Required for Urban Infill Sensitive Use Developments or Health Code, Article 38 (Ordinance 224-14, amended December 8, 2014)(Article 38). The Air Pollutant Exposure Zone as defined in Article 38 are areas that, based on modeling of all known air pollutant sources, exceed health protective standards for cumulative PM_{2.5} concentration, cumulative excess cancer risk, and incorporates health vulnerability factors and proximity to freeways. For sensitive use projects within the Air Pollutant Exposure Zone, the ordinance requires that the project sponsor submit an Enhanced Ventilation Proposal for approval by DPH that achieves protection from PM_{2.5} (fine particulate matter) equivalent to that associated with a Minimum Efficiency Reporting Value 13 filtration. The proposed project would not add a new sensitive use and therefore Article 38 does not apply.⁴⁹

Construction

A portion of the project site is located within an identified Air Pollutant Exposure Zone. Therefore, the ambient health risk to sensitive receptors from air pollutants is considered substantial. The proposed project may require heavy-duty off-road diesel vehicles and equipment during the 18 to 24 month construction period. Thus, Project Mitigation Measure 7, Construction Emissions Minimization, has been identified to implement the portions of Eastern Neighborhoods PEIR Mitigation Measure G-1 related to emissions exhaust by requiring engines with higher emissions standards on construction equipment. Project Mitigation Measure 7, Construction Emissions Minimization, would reduce DPM exhaust from construction equipment by 89 to 94 percent compared to uncontrolled construction equipment.⁵⁰

⁴⁷ Bay Area Air Quality Management District, CEQA Air Quality Guidelines, Updated May 2011. Table 3-1. Criteria air pollutant screening sizes for a General Light Industry is 541,000 square feet for operational, a General Office Building is 346,000 square feet for operational, and a Regional Shopping Center is 99,000 square feet for operational.

⁴⁸ The criteria air pollutant screening size for a Regional Shopping Center is 277,000 square feet for construction.

⁴⁹ Johnathan Piakis, San Francisco Department of Public Health, RE: Port of San Francisco: Pier 70 Historic Core Rehabilitation Project – Application for Article 38 Compliance Assessment. Email February 14, 2017. DPH determined that the project does not meet the applicability requirements of the section and, therefore, is not required to incorporate enhanced ventilation in accordance with Article 38

⁵⁰ PM emissions benefits are estimated by comparing off-road PM emission standards for Tier 2 with Tier 1 and 0. Tier 0 off-road engines do not have PM emission standards, but the United States Environmental Protection Agency's *Exhaust and Crankcase Emissions Factors for Nonroad Engine Modeling – Compression Ignition* has estimated Tier 0 engines between 50 hp and 100 hp to have a PM emission factor of 0.72 g/hp-hr and greater than 100 hp to have a PM emission factor of 0.40 g/hp-hr. Therefore, requiring off-road equipment to have at least a Tier 2 engine would result in between a 25 percent and 63 percent reduction in PM emissions, as compared to off-road equipment with Tier 0 or Tier 1 engines. The 25 percent reduction comes from comparing the PM emission

Therefore, impacts related to construction health risks would be less than significant through implementation of Project Mitigation 7.

Siting New Sources

Since not all tenants of the proposed project have been identified, and because it is anticipated that the use mix in specific buildings would change as certain tenants move in/out, it is not known whether the proposed project could be expected to generate 100 trucks per day or 40 refrigerated trucks per day or otherwise emit substantial levels of toxic air contaminants (TACs). Therefore, Eastern Neighborhoods PEIR Mitigation Measures G-3 and G-4 would apply to future tenants that could be expected to emit diesel particulate matter (DPM) or other TACs. PEIR Mitigation Measure G-3 would minimize potential exposure of sensitive receptors to DPM for new tenants that would be expected to be served by at least 100 trucks per day or 40 refrigerated trucks per day. The Planning Department would require that such uses be located no less than 1,000 feet from sensitive receptors, including residential units, schools, children's day care centers, hospitals, and nursing and convalescent homes.

Additionally, PEIR Mitigation Measure G-4 would apply to future tenants that would be expected to generate TACs as part of everyday operations. PEIR Mitigation Measure G-4 would require the preparation of an analysis that includes, at a minimum, a site survey to identify residential or other sensitive uses within 1,000 feet of the project site, prior to the first project approval action. This measure shall be applicable, at a minimum, to the following uses: dry cleaners; drive-through restaurants; gas dispensing facilities; auto body shops; metal plating shops; photographic processing shops; textiles; apparel and furniture upholstery; leather and leather products; appliance repair shops; mechanical assembly cleaning; printing shops; hospitals and medical clinics; biotechnology research facilities; warehousing and distribution centers; and any use served by at least 100 trucks per day. This measure would require implementation of best available control technologies on any equipment located within 1,000 feet of a sensitive receptor.

The project sponsor has agreed to implement PEIR Mitigation Measures G-3 and G-4 as Project Mitigation 8 and 9, respectively. With implementation of Project Mitigation Measure 8 and 9, impacts related to siting new sources of pollutants would be less than significant.

The Pier 70 Mixed-Use District DEIR identified a significant cumulative health risk impact, but found the impact to be less than significant with mitigation. The proposed project would be required to implement Project Mitigation Measures 7, 8, and 9, which would reduce the project's contribution to this cumulative impact to a less-than-significant level.

Conclusion

For the above reasons, the project would not result in significant air quality impacts that were not identified in the PEIR.

standards for off-road engines between 25 hp and 50 hp for Tier 2 (0.45 g/bhp-hr) and Tier 1 (0.60 g/bhp-hr). The 63 percent reduction comes from comparing the PM emission standards for off-road engines above 175 hp for Tier 2 (0.15 g/bhp-hr) and Tier 0 (0.40 g/bhp-hr). In addition to the Tier 2 requirement, ARB Level 3 VDECSs are required and would reduce PM by an additional 85 percent. Therefore, the mitigation measure would result in between an 89 percent (0.0675 g/bhp-hr) and 94 percent (0.0225 g/bhp-hr) reduction in PM emissions, as compared to equipment with Tier 1 (0.60 g/bhp-hr) or Tier 0 engines (0.40 g/bhp-hr).

Topics:	Significant Impact Peculiar to Project or Project Site	Significant Impact not Identified in PEIR	Significant Impact due to Substantial New Information	No Significant Impact not Previously Identified in PEIR
7. GREENHOUSE GAS EMISSIONS— Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒
b) Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

The greenhouse gas (GHG) emissions and global climate change represent cumulative impacts. GHG emissions cumulatively contribute to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature; instead, the combination of GHG emissions from past, present, and future projects have contributed and will continue to contribute to global climate change and its associated environmental impacts.

The Eastern Neighborhoods PEIR assessed the GHG emissions that could result from rezoning of the Central Waterfront Area Plan under the three rezoning options. The Eastern Neighborhoods Rezoning Options A, B, and C are anticipated to result in GHG emissions on the order of 4.2, 4.3 and 4.5 metric tons of CO₂E⁵¹ per service population,⁵² respectively. The Eastern Neighborhoods PEIR concluded that the resulting GHG emissions from the three options analyzed in the Eastern Neighborhoods Area Plans would be less than significant. No mitigation measures were identified in the PEIR.

The BAAQMD has prepared guidelines and methodologies for analyzing GHGs. These guidelines are consistent with CEQA Guidelines Sections 15064.4 and 15183.5 which address the analysis and determination of significant impacts from a proposed project's GHG emissions and allow for projects that are consistent with an adopted GHG reduction strategy to conclude that the project's GHG impact is less than significant. San Francisco's *Strategies to Address Greenhouse Gas Emissions*⁵³ presents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco's GHG reduction strategy in compliance with the BAAQMD and CEQA guidelines. These GHG reduction actions have resulted in a 23.3 percent reduction in GHG emissions in 2012 compared to 1990 levels,⁵⁴ exceeding the year 2020 reduction goals outlined in the BAAQMD's 2010 Clean Air Plan,⁵⁵ Executive

⁵¹ CO₂E, defined as equivalent Carbon Dioxide, is a quantity that describes other greenhouse gases in terms of the amount of Carbon Dioxide that would have an equal global warming potential.

⁵² Memorandum from Jessica Range to Environmental Planning staff, Greenhouse Gas Analyses for Community Plan Exemptions in Eastern Neighborhoods, April 20, 2010. This memorandum provides an overview of the GHG analysis conducted for the Eastern Neighborhoods PEIR and provides an analysis of the emissions using a service population (equivalent of total number of residents and employees) metric.

⁵³ San Francisco Planning Department, *Strategies to Address Greenhouse Gas Emissions in San Francisco*, November 2010. Available at http://sfmea.sfplanning.org/GHG_Reduction_Strategy.pdf, accessed March 3, 2016.

⁵⁴ ICF International, Technical Review of the 2012 Community-wide Inventory for the City and County of San Francisco, January 21, 2015.

⁵⁵ Bay Area Air Quality Management District, *Clean Air Plan*, September 2010. Available at <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>, accessed March 3, 2016.

Order S-3-05⁵⁶, B-30-15,^{57,58} and Senate Bill (SB) 32.^{59,60} In addition, San Francisco's GHG reduction goals are consistent with, or more aggressive than, the long-term goals established under Executive Orders S-3-05⁶¹ and B-30-15.^{62,63} Therefore, projects that are consistent with San Francisco's GHG Reduction Strategy would not result in GHG emissions that would have a significant effect on the environment and would not conflict with state, regional, and local GHG reduction plans and regulations.

The proposed project would increase the intensity of use of the site during construction and operation of the proposed project. Therefore, the proposed project would contribute to annual long-term increases in GHGs as a result of increased vehicle trips (mobile sources) and commercial operations that result in an increase in energy use, water use, wastewater treatment, and solid waste disposal. Construction activities would also result in temporary increases in GHG emissions.

The proposed project would be subject to regulations adopted to reduce GHG emissions as identified in the GHG reduction strategy. As discussed below, compliance with the applicable regulations would reduce the project's GHG emissions related to transportation, energy use, waste disposal, wood burning, and use of refrigerants.

Compliance with the City's Commuter Benefits Program, transportation management programs, Transportation Demand Management Ordinance, Transportation Sustainability Fee, and bicycle parking requirements, would reduce the proposed project's transportation-related emissions. These regulations reduce GHG emissions from single-occupancy vehicles by promoting the use of alternative transportation modes with zero or lower GHG emissions on a per capita basis.

⁵⁶ Office of the Governor, *Executive Order S-3-05*, June 1, 2005. Available at <https://www.gov.ca.gov/news.php?id=1861>, accessed March 3, 2016.

⁵⁷ Office of the Governor, *Executive Order B-30-15*, April 29, 2015. Available at <https://www.gov.ca.gov/news.php?id=18938>, accessed March 3, 2016. Executive Order B-30-15 sets a State GHG emissions reduction goal of 40 percent below 1990 levels by the year 2030.

⁵⁸ San Francisco's GHG Reduction Goals are codified in Section 902 of the Environment Code and include: (i) by 2008, determine City GHG emissions for year 1990; (ii) by 2017, reduce GHG emissions by 25 percent below 1990 levels; (iii) by 2025, reduce GHG emissions by 40 percent below 1990 levels; and by 2050, reduce GHG emissions by 80 percent below 1990 levels.

⁵⁹ Senate Bill 32 amends California Health and Safety Code Division 25.5 (also known as the California Global Warming Solutions Act of 2006) by adding Section 38566, which directs that statewide greenhouse gas emissions to be reduced by 40 percent below 1990 levels by 2030.

⁶⁰ Senate Bill 32 was paired with Assembly Bill 197, which would modify the structure of the State Air Resources Board; institute requirements for the disclosure of greenhouse gas emissions criteria pollutants, and toxic air contaminants; and establish requirements for the review and adoption of rules, regulations, and measures for the reduction of greenhouse gas emissions.

⁶¹ Executive Order S-3-05 sets forth a series of target dates by which statewide emissions of GHGs need to be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels (approximately 457 million MTCO₂E); by 2020, reduce emissions to 1990 levels (approximately 427 million MTCO₂E); and by 2050 reduce emissions to 80 percent below 1990 levels (approximately 85 million MTCO₂E).

⁶² Office of the Governor, *Executive Order B-30-15*, April 29, 2015. Available at <https://www.gov.ca.gov/news.php?id=18938>, accessed March 3, 2016. Executive Order B-30-15 sets a state GHG emissions reduction goal of 40 percent below 1990 levels by the year 2030.

⁶³ San Francisco's GHG reduction goals are codified in Section 902 of the Environment Code and include: (i) by 2008, determine City GHG emissions for year 1990; (ii) by 2017, reduce GHG emissions by 25 percent below 1990 levels; (iii) by 2025, reduce GHG emissions by 40 percent below 1990 levels; and by 2050, reduce GHG emissions by 80 percent below 1990 levels.

The proposed project would be required to comply with the energy efficiency requirements of the Port's Green Building Code, Stormwater Management Ordinance, Water Conservation and Irrigation ordinances, and California Energy Code light pollution reduction requirements, which would promote energy and water efficiency, thereby reducing the proposed project's energy-related GHG emissions.⁶⁴

The proposed project's waste-related emissions would be reduced through compliance with the City's Recycling and Composting Ordinance, Construction and Demolition Debris Recovery Ordinance, and Green Building Code requirements. These regulations reduce the amount of materials sent to a landfill, reducing GHGs emitted by landfill operations. These regulations also promote reuse of materials, conserving their embodied energy⁶⁵ and reducing the energy required to produce new materials.

Other regulations, including those limiting refrigerant emissions and the Wood Burning Fireplace Ordinance would reduce emissions of GHGs and black carbon, respectively. Regulations requiring low-emitting finishes would reduce volatile organic compounds (VOC).⁶⁶ Thus, the proposed project was determined to be consistent with San Francisco's GHG reduction strategy.⁶⁷

Therefore, the proposed project's GHG emissions would not conflict with state, regional, and local GHG reduction plans and regulations. Furthermore, the proposed project is within the scope of the development evaluated in the PEIR and would not result in impacts associated with GHG emissions beyond those disclosed in the PEIR. For the above reasons, the proposed project would not result in significant GHG emissions that were not identified in the Eastern Neighborhoods PEIR and no mitigation measures are necessary.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
8. WIND AND SHADOW—Would the project:				
a) Alter wind in a manner that substantially affects public areas?	☐	☐	☐	☒
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	☐	☐	☐	☒

Wind

Based upon experience of the Planning Department in reviewing wind analyses and expert opinion on other projects, it is generally (but not always) the case that projects under 80 feet in height do not have the potential to generate significant wind impacts. The proposed project would involve renovation and reuse

⁶⁴ Compliance with water conservation measures reduce the energy (and GHG emissions) required to convey, pump and treat water required for the project.

⁶⁵ Embodied energy is the total energy required for the extraction, processing, manufacture and delivery of building materials to the building site.

⁶⁶ While not a GHG, VOCs are precursor pollutants that form ground level ozone. Increased ground level ozone is an anticipated effect of future global warming that would result in added health effects locally. Reducing VOC emissions would reduce the anticipated local effects of global warming.

⁶⁷ San Francisco Planning Department, Greenhouse Gas Analysis: Compliance Checklist for Pier 70 "20th Street Historic Core", February 3, 2017.

of the 20th Street Historic Core, would demolish two existing buildings, and would construct a two-story building, which would be lower in height than the adjacent neighboring buildings. For the above reasons, the proposed project is not anticipated to cause significant impacts related to wind that were not identified in the Eastern Neighborhoods PEIR.

The Pier 70 Mixed-Use District DEIR, which included the proposed project in its cumulative analysis, did not identify a significant cumulative wind impact. Therefore, the proposed project's cumulative wind impact would be less than significant.

Shadow

Planning Code Section 295 generally prohibits new structures above 40 feet in height that would cast additional shadows on open space that is under the jurisdiction of the San Francisco Recreation and Park Commission between one hour after sunrise and one hour before sunset, at any time of the year, unless that shadow would not result in a significant adverse effect on the use of the open space. Under the Eastern Neighborhoods Rezoning and Area Plans, sites surrounding parks could be redeveloped with taller buildings without triggering Section 295 of the Planning Code because certain parks are not subject to Section 295 of the Planning Code (i.e., under jurisdiction of departments other than the Recreation and Parks Department or privately owned). The Eastern Neighborhoods PEIR could not conclude if the rezoning and community plans would result in less-than-significant shadow impacts because the feasibility of complete mitigation for potential new shadow impacts of unknown proposals could not be determined at that time. Therefore, the PEIR determined shadow impacts to be significant and unavoidable. No mitigation measures were identified in the PEIR.

The proposed project would construct a new 33-foot-tall building (45-feet tall with the skylight feature); therefore, the Planning Department prepared a preliminary shadow fan analysis to determine whether the project would have the potential to cast new shadow on nearby parks. The analysis determined that the project would not cast shadow on any public open spaces or recreational resources, including but not limited to parks under the jurisdiction of the San Francisco Recreation and Parks Department.⁶⁸

For the above reasons, the proposed project would not result in significant impacts related to shadow that were not identified in the Eastern Neighborhoods PEIR.

As the proposed project would not cast any shadow on any public open spaces or recreational resources, it would not have the potential to result in cumulative shadow impacts. Therefore, cumulative shadow impacts would be less than significant.

⁶⁸ San Francisco Planning Department. 2016. Illinois and 20th Streets/Pier 70 ("20th Street Historic Core") Shadow Fan. December 28, 2016.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
9. RECREATION—Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	☐	☐	☐	☒
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☐	☒
c) Physically degrade existing recreational resources?	☐	☐	☐	☒

The Eastern Neighborhoods PEIR concluded that implementation of the Eastern Neighborhoods Rezoning and Area Plans would not result in substantial or accelerated deterioration of existing recreational resources or require the construction or expansion of recreational facilities that may have an adverse effect on the environment. No mitigation measures related to recreational resources were identified in the Eastern Neighborhoods PEIR. However, the PEIR identified Improvement Measure H-1: Support for Upgrades to Existing Recreation Facilities. This improvement measure calls for the City to implement funding mechanisms for an ongoing program to repair, upgrade and adequately maintain park and recreation facilities to ensure the safety of users.

As part of the Eastern Neighborhoods adoption, the City adopted impact fees for development in Eastern Neighborhoods that goes towards funding recreation and open space. Since certification of the PEIR, the voters of San Francisco passed the 2012 San Francisco Clean and Safe Neighborhood Parks Bond providing the Recreation and Parks Department an additional \$195 million to continue capital projects for the renovation and repair of parks, recreation, and open space assets. This funding is being utilized for improvements and expansion to Garfield Square, South Park, Potrero Hill Recreation Center, Warm Water Cove Park, and Pier 70 Parks Shoreline within the Eastern Neighborhoods Plan area. The impact fees and the 2012 San Francisco Clean and Safe Neighborhood Parks Bond are funding measures similar to that described in PEIR Improvement Measure H-1: Support for Upgrades to Existing Recreation Facilities.

An update of the Recreation and Open Space Element (ROSE) of the General Plan was adopted in April 2014. The amended ROSE provides a 20-year vision for open spaces in the City. It includes information and policies about accessing, acquiring, funding, and managing open spaces in San Francisco. The amended ROSE identifies areas within the Eastern Neighborhoods Plan area for acquisition and the locations where new open spaces and open space connections should be built, consistent with PEIR Improvement Measure H-2: Support for New Open Space. Two of these open spaces, Daggett Park and 17th & Folsom Park, would be open in 2017. In addition, the amended ROSE identifies the role of both the Better Streets Plan (refer to "Transportation" section for description) and the Green Connections Network in open space and recreation. Green Connections are special streets and paths that connect people to parks, open spaces, and the waterfront, while enhancing the ecology of the street environment. Six routes identified within the Green Connections Network cross the Eastern Neighborhoods Plan area: Mission to Peaks (Route 6); Noe Valley to Central Waterfront (Route 8), a portion of which has been conceptually

designed; Tenderloin to Potrero (Route 18); Downtown to Mission Bay (Route 19); Folsom, Mission Creek to McLaren (Route 20); and Shoreline (Route 24).

As the proposed project would not degrade recreational facilities and is consistent with the development density established under the Eastern Neighborhoods Rezoning and Area Plans, there would be no additional impacts on recreation beyond those analyzed in the Eastern Neighborhoods PEIR.

The Pier 70 Mixed-Use District DEIR, which included the proposed project in its cumulative analysis, did not identify a significant cumulative impact on recreational facilities or resources. Therefore, the proposed project's cumulative impact on recreation facilities or resources would be less than significant.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
10. UTILITIES AND SERVICE SYSTEMS—Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?	☐	☐	☐	☒
e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☒
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

The Eastern Neighborhoods PEIR determined that the anticipated increase in population would not result in a significant impact to the provision of water, wastewater collection and treatment, and solid waste collection and disposal. No mitigation measures were identified in the PEIR.

Since certification of the PEIR, the San Francisco Public Utilities Commission (SFPUC) adopted the 2010 Urban Water Management Plan (UWMP) in June 2011. The UWMP update includes city-wide demand projections to the year 2035, compares available water supplies to meet demand and presents water

demand management measures to reduce long-term water demand. Additionally, the UWMP update includes a discussion of the conservation requirement set forth in Senate Bill 7 passed in November 2009 mandating a statewide 20% reduction in per capita water use by 2020. The UWMP includes a quantification of the SFPUC's water use reduction targets and plan for meeting these objectives. The UWMP projects sufficient water supply in normal years and a supply shortfall during prolonged droughts. Plans are in place to institute varying degrees of water conservation and rationing as needed in response to severe droughts.

In addition, the SFPUC is in the process of implementing the Sewer System Improvement Program, which is a 20-year, multi-billion dollar citywide upgrade to the City's sewer and stormwater infrastructure to ensure a reliable and seismically safe system. The program includes planned improvements that will serve development in the Eastern Neighborhoods Plan area including at the Southeast Treatment Plant, the Central Bayside System, and green infrastructure projects, such as the Mission and Valencia Green Gateway.

As the proposed project is consistent with the development density established under the Eastern Neighborhoods Rezoning and Area Plans, there would be no additional impacts on utilities and service systems beyond those analyzed in the Eastern Neighborhoods PEIR.

The Pier 70 Mixed-Use District DEIR, which included the proposed project in its cumulative analysis, did not identify a significant cumulative impact on utilities and service systems. Therefore, the proposed project's cumulative impact on utilities and service systems would be less than significant.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
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11. PUBLIC SERVICES—Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services? | ☐ | ☐ | ☐ | ☒ |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The Eastern Neighborhoods PEIR determined that the anticipated increase in population would not result in substantial adverse physical impacts associated with the provision of or need for new or physically altered public services, including fire protection, police protection, and public schools. No mitigation measures were identified in the PEIR.

As the proposed project is consistent with the development density established under the Eastern Neighborhoods Rezoning and Area Plans, the project would not result in new or substantially more severe impacts on the physical environment associated with the provision of public services beyond those analyzed in the Eastern Neighborhoods PEIR.

The Pier 70 Mixed-Use District DEIR included the proposed project in its cumulative analysis and did not identify a significant cumulative impact on public services. Therefore, the proposed project's cumulative impact on public services would be less than significant.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
12. BIOLOGICAL RESOURCES—Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

As discussed in the Eastern Neighborhoods PEIR, the Eastern Neighborhoods Plan area is in a developed urban environment that does not provide native natural habitat for any rare or endangered plant or animal species. There are no riparian corridors, estuaries, marshes, or wetlands in the Plan Area that could be affected by the development anticipated under the Area Plan. In addition, development envisioned under the Eastern Neighborhoods Area Plan would not substantially interfere with the movement of any resident or migratory wildlife species. For these reasons, the PEIR concluded that implementation of the Area Plan would not result in significant impacts on biological resources, and no mitigation measures were identified.

Common bats (Mexican free-tailed bat) and special-status bats (Pallid bat and Yuma myotis) have the potential to roost in existing vacant or underutilized buildings, other human-made structures, and trees within or near the project site. Bats and other non-game mammals are protected in California under the State Fish and Game Code. Maternity roosts are roosts occupied by pregnant females or females with non-flying young. Non-breeding roosts are day roosts without pregnant females or non-flying young. Destruction of an occupied, non-breeding bat roost, resulting in the death of bats; disturbance that causes the loss of a maternity colony of bats (resulting in the death of young); or destruction of hibernacula⁶⁹ are prohibited under the California Fish and Game Code and would be considered a significant impact (although hibernacula generally are not formed by bat species in the Bay Area due to sufficiently high temperatures year round). This may occur due to direct or indirect disturbances. Direct disturbance could include building removal (demolition), tree removal, or roost destruction by any other means. Indirect disturbance to bat species could result in behavioral alterations due to construction-associated noise or vibration, or increased human activity in the area.

The proposed project, which involves demolition of two vacant buildings (Buildings 40 and 177), could result in direct mortality of or indirect disturbance to roosting special-status bats, if present. Direct mortality of special-status bats would be a significant impact. Additionally, common bats may establish maternity roosts in these same locations. Implementation of Project Mitigation Measure 10: Avoidance and Minimization Measures for Bats, shown below, would reduce potential impacts on special-status bats and common bat maternity roosts to a less-than-significant level by requiring preconstruction surveys and implementing avoidance measures if potential roosting habitat or active roosts are located.

Project Mitigation Measure 10 – Mitigation Measure M-BI-2: Avoidance and Minimization Measures for Bats

A qualified biologist (as defined by CDFW⁷⁰) who is experienced with bat surveying techniques (including auditory sampling methods), behavior, roosting habitat, and identification of local bat species shall be consulted prior to demolition activities to conduct a pre-construction habitat assessment of the project site (focusing on buildings to be demolished or relocated) to characterize potential bat habitat and identify potentially active roost sites. No further action is required should the preconstruction habitat assessment not identify bat habitat or signs of potentially active bat roosts within the project site (e.g., guano, urine staining, dead bats, etc.). The following measures shall be implemented should potential roosting habitat or potentially active bat roosts be identified during the habitat assessment in buildings to be demolished or relocated under the Proposed Project:

- a) In areas identified as potential roosting habitat during the habitat assessment, initial building demolition and renovation shall occur when bats are active, approximately between the periods of March 1 to April 15 and August 15 to October 15, to the extent feasible. These dates avoid the bat maternity roosting season and period of winter torpor.⁷¹

⁶⁹ Hibernaculum refers to the winter quarters of a hibernating animal.

⁷⁰ CDFW defines credentials of a "qualified biologist" within permits or authorizations issued for a project. Typical qualifications include a minimum of five years of academic training and professional experience in biological sciences and related resource management activities, and a minimum of two years of experience conducting surveys for each species that may be present within the project area.

⁷¹ Torpor refers to a state of decreased physiological activity with reduced body temperature and metabolic rate.

- b) Depending on temporal guidance as defined below, the qualified biologist shall conduct pre-construction surveys of potential bat roost sites identified during the initial habitat assessment no more than 14 days prior to building demolition or renovation.
- c) If active bat roosts or evidence of roosting is identified during pre-construction surveys, the qualified biologist shall determine, if possible, the type of roost and species. A no-disturbance buffer shall be established around roost sites until the qualified biologist determines they are no longer active. The size of the no disturbance buffer would be determined by the qualified biologist and would depend on the species present, roost type, existing screening around the roost site (such as dense vegetation or a building), as well as the type of construction activity that would occur around the roost site. If special-status bat species or maternity or hibernation roosts are detected during these surveys, appropriate species- and roost-specific avoidance and protection measures shall be developed by the qualified biologist in coordination with CDFW. Such measures may include postponing the removal or renovation of buildings, establishing exclusionary work buffers while the roost is active (e.g., 100-foot no disturbance buffer), or other compensatory mitigation.
- d) The qualified biologist shall be present during building demolition and renovation if potential bat roosting habitat or active bat roosts are present.
- e) The demolition or renovation of buildings containing or suspected to contain bat roosting habitat or active bat roosts shall be done under the supervision of the qualified biologist. When appropriate, buildings shall be partially dismantled to significantly change the roost conditions, causing bats to abandon and not return to the roost, likely in the evening and after bats have emerged from the roost to forage. Under no circumstances shall active maternity roosts be disturbed until the roost disbands at the completion of the maternity roosting season or otherwise becomes inactive, as determined by the qualified biologist.

The Pier 70 Mixed-Use District DEIR identified a significant cumulative on biological resources, both terrestrial and marine, but found that this impact could be mitigated to a less than significant level. Since the project site is located approximately 500 feet from the San Francisco Bay, the proposed project would not contribute to the cumulative impact on marine habitats and associated biological communities that were identified in the Pier 70 Mixed-Use District DEIR.

Since the proposed project would demolish two vacant buildings, the project would contribute to a cumulative impact on bats that was identified by the Pier 70 Mixed-Use District DEIR. Project Mitigation Measure 10 would reduce potential impacts on special-status bats and common bat maternity roosts to a less-than-significant level by requiring preconstruction surveys and implementing avoidance measures if potential roosting habitat or active roosts are located. With implementation of Project Mitigation Measure 10, Avoidance and Minimization Measures for Bats, the project's contribution to the cumulative impact would not be cumulatively considerable.

Topics:	Significant Impact Peculiar to Project or Project Site	Significant Impact not Identified in PEIR	Significant Impact due to Substantial New Information	No Significant Impact not Previously Identified in PEIR
13. GEOLOGY AND SOILS—Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☐	☒
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Change substantially the topography or any unique geologic or physical features of the site?	☐	☐	☐	☒

The Eastern Neighborhoods PEIR concluded that implementation of the Plan would indirectly increase the population that would be subject to an earthquake, including seismically induced ground-shaking, liquefaction, and landslides. The PEIR also noted that new development is generally safer than comparable older development due to improvements in building codes and construction techniques. Compliance with applicable codes and recommendations made in project-specific geotechnical analyses would not eliminate earthquake risks, but would reduce them to an acceptable level, given the seismically active characteristics of the Bay Area. Thus, the PEIR concluded that implementation of the Plan would not result in significant impacts with regard to geology, and no mitigation measures were identified in the Eastern Neighborhoods PEIR.

Several geotechnical investigations have been prepared for the project site.^{72,73,74} The following discussion relies on the information provided in the geotechnical investigations.

⁷² AGS, Inc., *Geotechnical Investigation for Mariposa Storage/Transport Facilities, San Francisco, California*, June 1989.

The topography of the project site is relatively level but slopes slightly downward toward the east. Geotechnical soil borings were excavated to a maximum depth of approximately 66 feet below ground surface (bgs). Based on the soil analysis of the borings, the site subsurface conditions vary. The site contains about 18 feet of fill that consists of loose gravel and stiff clay with sand overlaying approximately 9 feet of hard clay. The fill thickness generally increases from south to north as does the depth of the bedrock. Bedrock is anticipated to be roughly at grade in the vicinity of Building 116 and in the southeastern half of Building 14. Top of bedrock was encountered in borings at depths ranging from 26 feet bgs near the southeastern end of Building 101 to 58 feet bgs near the southeastern end of Building 104. Fill materials were encountered throughout the site, with thicknesses up to 29 feet in the vicinity of the southeastern corner of Building 104. Fill appears to have been placed over varying thicknesses of Bay Mud in the vicinity of Buildings 102 and 104. Groundwater was encountered at about eight to twelve feet bgs. The proposed project would not involve excavation to this depth and is therefore unlikely to encounter groundwater.

The project site does not lie within an Alquist-Priolo Earthquake Fault Zone as defined by the California Division of Mines and Geology. No known active faults cross the project site. The closest mapped active fault in the vicinity of the project site is the San Andreas Fault, located approximately 7.5 miles west from the project site. The proximity of this fault line would likely result in strong to very strong earthquake shaking at the project site.

The project site is located within a liquefaction potential zone as mapped by the California Division of Mines and Geology for the City and County of San Francisco. Based on analysis of geotechnical borings taken on and adjacent to the project site, some soils within the upper 26 feet are potentially susceptible to liquefaction, and could experience seismically-induced settlement of up to three inches. However, since the liquefaction layer is not continuous, the potential for lateral spreading is low. The report also determined that potential hazards associated with landsliding are nil at the project site.

According to available drawings, Building 101 is supported on footings bearing in bedrock. Building 104 and likely Building 102 are supported on fill. Under existing conditions, bedrock is likely to be exposed or be within several feet of the ground surface underneath Building 116 and the southeastern half of Building 14. The bedrock in the vicinity of the site is typically weak and friable, but can support shallow foundations with relatively high bearing pressures.

The geotechnical investigations provided recommendations for foundation options to reduce the risks related to the seismic hazards and site conditions noted above, including: (1) further evaluation of footings founded on competent soil or bedrock using an allowable bearing pressure of 6,000 pounds per square foot, with a one third increase for total loads for Building 113 using micropiles; and (2) where new foundations are required to support improvements, footings bearing in bedrock would be the preferable option; where footings would need to extend too deep to make their construction practical, micropiles should be used. Additionally, micropiles may be used to support seismic elements and resist uplift loads. Micropiles can be designed to provide both compression and tension support in the stiff soil or bedrock below the fill and Bay Mud. The project sponsor has agreed to implement these measures, subject to building permit requirements.

⁷³ Treadwell and Rollo, *Geotechnical Investigation for Pier 70, Building 113, San Francisco, California*, April 28, 2010.

⁷⁴ Langan Treadwell Rollo, *Geotechnical Consultation for Pier 70 Historic Building Renovations, San Francisco, California*, May 28, 2013.

The geotechnical investigation concluded that the site is suitable for support of the proposed project. The proposed project would be required to incorporate these and any future recommendations into the final building design through the building permit review process. Through this process, the Port (Port Harbor Engineer) would review the geotechnical investigation to determine the adequacy of necessary engineering and design features to ensure compliance with all Building Code provisions regarding structure safety. Past geological and geotechnical investigation would be available for use by the Port Harbor Engineer during review of building permits for the project site.

In light of the above, the proposed project would not result in a significant effect related to seismic and geologic hazards. Therefore, the proposed project would not result in significant impacts related to geology and soils that were not identified in the Eastern Neighborhoods PEIR, and no mitigation measures are necessary.

The Pier 70 Mixed-Use District DEIR included the proposed project in its cumulative analysis and did not identify a significant cumulative impact on geology and soils. Therefore, the proposed project's cumulative impact on geology and soils would be less than significant.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
14. HYDROLOGY AND WATER QUALITY—Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☐	☒
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	☐	☐	☐	☒
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☐	☒
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
f) Otherwise substantially degrade water quality?	☐	☐	☐	☒

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

The Eastern Neighborhoods PEIR determined that the anticipated increase in population would not result in a significant impact on hydrology and water quality, including the combined sewer system and the potential for combined sewer outflows. No mitigation measures were identified in the PEIR.

The existing project site is completely covered by existing buildings and impervious surfaces with the exception of small, weeded patches in front of Building 102. The proposed project would include the renovation and reuse the 20th Street Historic Core, construction of a 9,000 sf building adjacent to Building 101, demolition of Buildings 40 and 117, and improvement of roadways, sidewalks, and parking lots within the project site. Groundwater is relatively shallow throughout the project site, approximately eight to 12 feet bgs.⁷⁵ The proposed project would not involve excavation to this depth and is therefore unlikely to encounter groundwater. However, any groundwater that is encountered during construction would be subject to requirements of the City's Sewer Use Ordinance (Ordinance Number 19-92, amended 116-97), as supplemented by Public Works Order No. 158170, requiring a permit from the Wastewater Enterprise Collection System Division of the SFPUC. A permit may be issued only if an effective pretreatment system is maintained and operated. Each permit for such discharge shall contain specified water quality standards and may require the project sponsor to install and maintain meters to measure the volume of the discharge to the combined sewer system. Effects from lowering the water table due to dewatering, if any, would be temporary and would not be expected to substantially deplete groundwater resources.

The proposed project would not increase the amount of impervious surface area on the project site. In accordance with the San Francisco Stormwater Management Ordinance (Ordinance No. 83-10), the proposed project would be subject to and would comply with Low Impact Design approaches and stormwater management systems to comply with the Stormwater Design Guidelines. Therefore, the proposed project would not adversely affect runoff and drainage.

Therefore, the proposed project would not result in any significant impacts related to hydrology and water quality that were not identified in the Eastern Neighborhoods PEIR. In addition, the Pier 70 Mixed-Use District DEIR included the proposed project in its cumulative analysis and did not identify a

⁷⁵ Geotechnical Consultation for Pier 70 Historic Building Renovations, San Francisco, California, Langan Treadwell Rollo, May 28, 2013.

significant cumulative impact on hydrology and water quality. Therefore, the proposed project's cumulative impact on hydrology and water quality would be less than significant.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
15. HAZARDS AND HAZARDOUS MATERIALS—Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h) Expose people or structures to a significant risk of loss, injury, or death involving fires?	☐	☐	☐	☒

The Eastern Neighborhoods PEIR noted that implementation of any of the proposed project's rezoning options would encourage construction of new development within the project area. The PEIR found that there is a high potential to encounter hazardous materials during construction activities in many parts of the project area because of the presence of 1906 earthquake fill, previous and current land uses associated with the use of hazardous materials, and known or suspected hazardous materials cleanup cases. However, the PEIR found that existing regulations for facility closure, Under Storage Tank (UST) closure, and investigation and cleanup of soil and groundwater would ensure implementation of measures to protect workers and the community from exposure to hazardous materials during construction.

Hazardous Building Materials

The Eastern Neighborhoods PEIR determined that future development in the Plan Area may involve demolition or renovation of existing structures containing hazardous building materials. Some building materials commonly used in older buildings could present a public health risk if disturbed during an accident or during demolition or renovation of an existing building. Hazardous building materials addressed in the PEIR include asbestos, electrical equipment such as transformers and fluorescent light ballasts that contain PCBs or di (2 ethylhexyl) phthalate (DEHP), fluorescent lights containing mercury vapors, and lead-based paints. Asbestos and lead based paint may also present a health risk to existing building occupants if they are in a deteriorated condition. If removed during demolition of a building, these materials would also require special disposal procedures. The Eastern Neighborhoods PEIR identified a significant impact associated with hazardous building materials including PCBs, DEHP, and mercury, and determined that that PEIR Mitigation Measure L-1 Hazardous Building Materials would reduce effects to a less-than-significant level. Because the proposed development includes renovation of existing buildings and demolition of Buildings 40 and 117, PEIR Mitigation Measure L-1 would apply to the proposed project and is included as Project Mitigation Measure 11. Project Mitigation Measure 11 would require the project sponsor to ensure that any equipment containing polychlorinated biphenyls (PCBs) or mercury, such as fluorescent light ballasts, are removed and properly disposed, and that any fluorescent light tube fixtures, which could contain mercury, are similarly removed intact and properly disposed (see full text in the Mitigation Measures section below).

Soil and Groundwater Contamination

Since certification of the PEIR, Article 22A of the Health Code, also known as the Maher Ordinance, was expanded to include properties throughout the City where there is potential to encounter hazardous materials, primarily industrial zoning districts, sites with industrial uses or USTs, sites with historic bay fill, and sites in close proximity to freeways or USTs. The over-arching goal of the Maher Ordinance is to protect public health and safety by requiring appropriate handling, treatment, disposal and when necessary, remediation of contaminated soils that are encountered in the building construction process. Projects that disturb 50 cubic yards or more of soil that are located on sites with potentially hazardous soil or groundwater within Eastern Neighborhoods Plan area are subject to this ordinance.

The proposed project would disturb 50 cubic yards or more of soil and would be subject to Article 22A of the Health Code, which is administered and overseen by DPH. The Maher Ordinance requires the project sponsor to retain the services of a qualified professional to prepare a Phase I Environmental Site Assessment (ESA) that meets the requirements of Health Code Section 22.A.6.

The Port has already completed an extensive investigation of the entire Pier 70 site within which the proposed project is located, including a Site Investigation Report and Feasibility Study/Remedial Action Plan (FS/RAP)⁷⁶ and a Risk Management Plan (RMP)⁷⁷ covering the Pier 70 area and the studies have already been approved by the Regional Water Quality Control Board (Water Board). The Site Investigation Report fulfills the requirement for a Site History Report under Health Code Article 22A, and completed sampling and analysis that would typically be performed to meet the soil characterization requirements of Article 22A. Consequently, the RMP contemplates that a project sponsor may

⁷⁶ Treadwell & Rollo, "Feasibility Study and Remedial Action Plan, Pier 70 Master Plan Area, San Francisco, California," May 2012.

⁷⁷ Treadwell & Rollo, "Pier 70 Risk Management Plan, Pier 70 Plan Area, San Francisco, California," July 25, 2013.

demonstrate that work completed to date fulfills the requirements of Article 22A on a project-specific basis.

In addition, numerous studies of environmental conditions in and around the project site have been undertaken by various parties. Those addressing all or portions of the project site include: a Phase I ESA prepared by Tetra Tech, Inc. for the Port,⁷⁸ a Phase I ESA prepared by Ecology and Environment for the U.S. Environmental Protection Agency (EPA),⁷⁹ and a Phase II ESA prepared by Ecology and Environment, Inc. for the EPA.⁸⁰ These reports collectively fulfill the requirement for a Site History Report. Evaluation of site history and other findings of the Phase I ESAs indicated that additional soil and groundwater characterization was warranted and would be required under oversight agreements with two agencies that have regulatory jurisdiction over site remediation in San Francisco: the Water Board and DPH.

Summary of Environmental Site Investigation

Building on information obtained from the earlier site assessments listed above, the Port undertook additional environmental investigation of the Pier 70 Master Plan Area, including the project site, in 2009 and 2010. The investigations included collection and analysis of soil, soil gas, and groundwater. Samples were analyzed for potentially hazardous constituents, both naturally occurring and related to historic industrial activities at the site. The site history information and other findings of previous site assessments, and sampling and analysis results from previous investigations were incorporated into the data set with the results of the subsequent additional investigation by the Port. The resultant comprehensive site history and environmental investigation report prepared by Treadwell and Rollo, Inc., for the Port was published in 2011 and subsequently approved by the Water Board.⁸¹

The following are findings and conclusions from the site investigation:

- Shallow soil (less than 10 feet below grade) within the project site contains metals, both naturally occurring and introduced, and petroleum hydrocarbons at concentrations that exceed site-specific cleanup levels.
- Some soil samples collected within the project site contained low concentrations (<1%) of naturally-occurring asbestos.
- Groundwater contains contaminants at concentrations that do not pose a significant risk of adverse impact to human health or the environment.
- Soil gas impacts are minimal and do not pose a significant risk to human health or the environment.
- Potential human health risk resulting from contaminants at Pier 70 results primarily from construction workers' exposure to soil and groundwater.

⁷⁸ Tetra Tech, Inc. "Phase I Environmental Site Assessment- Pier 70 Mixed Use Opportunity Area, Corner of Illinois Street and 20th Street," August 1998.

⁷⁹ Ecology and Environment, Inc., "Phase I Brownfields Environmental Site Assessment Report - Pier 70 Maritime Use Area," March 2001.

⁸⁰ Ecology and Environment, Inc., 2000. Phase II Brownfields Targeted Site Assessment Report - Pier 70 Mixed Use Opportunity Area, November.

⁸¹ Treadwell & Rollo, Inc., 2011. Environmental Site Investigation Report – Pier 70 Master Plan Area, January 13.

Feasibility Study and Remedial Action Plan

Building upon the findings of the site investigation, Treadwell & Rollo, Inc., developed the Feasibility Study and Remedial Action Plan (FS/RAP).⁸² The FS/RAP followed methodology specified by applicable federal and state regulatory guidance, and was conducted with oversight by the Water Board and DPH. The FS/RAP included the following:

- Identification of remedial actions that could be taken to reduce risks associated with contamination and their suitability for use at Pier 70, and analyzed a short list of five potentially feasible scenarios.
- Evaluation of each scenario with respect to nine federally-specified criteria, six state-specified criteria, and factors related to the environmental impact and sustainability of the remedial action itself.
- Identification of a preferred remediation scenario, and documented basis for that selection.

The FS/RAP considered the extent to which remedial actions would protect human health and the environment under all anticipated future land uses at Pier 70: commercial/industrial, residential (existing vacant unit), and recreational. Under the parcel-specific land uses envisioned in the Pier 70 Preferred Master Plan, only contaminated soil requires remediation. Consequently the FS/RAP focused on remedial alternatives for contaminated soil. The Feasibility Study (FS) determined that "institutional controls and capping" scored highest of the feasible alternatives analyzed, and is the recommended alternative for addressing risks associated with contaminants at the site.

The proposed FS/RAP therefore consists of installation of durable covers over site soil, and adoption of institutional controls, monitoring, and maintenance. Durable covers would be designed to prevent future site users' exposure to underlying soil. Acceptable covers include new or existing buildings, streets and sidewalks, "hardscape" and paving, new landscaping installed with an appropriate thickness of clean soil, and stabilized shoreline areas.

The FS/RAP anticipated that remedial action would occur concurrent with site development and that a RMP would be developed for the entire site to specify management measures that would be implemented to protect human health and the environment during and after site development.

Institutional controls to be imposed as part of the RAP would include, but may not be limited to:

- Activity restrictions prohibiting exposed native soil or growing produce in on-site soils;
- Prohibiting domestic or industrial use of groundwater, and limiting groundwater handling on-site to dewatering during construction activities;
- Management of soil and groundwater in accordance with an approved RMP;
- Requirement that soil removed from one portion of the site for re-use elsewhere within the site be placed under durable cover;
- Notification of tenants and contractors regarding contaminants and required compliance with RMP;
- Inspection and maintenance of covers in accordance with an approved RMP; and
- Right of access to the site by regulatory agency personnel for periodic inspections of durable covers.

The RAP is appropriate for commercial, industrial, residential and or recreational land uses, wherever they may be developed within the area evaluated by the FS/RAP, provided that development is implemented in accordance with the RMP. The RMP may require additional risk evaluation, and potentially additional

⁸² Treadwell & Rollo, Inc., 2012. Feasibility Study and Remedial Action Plan, Pier 70 Master Plan Area, May.

measures to minimize or eliminate exposure to soil gas and/or groundwater if residential development is proposed in those limited areas where volatile contaminants may be present above residential cleanup levels.

The final FS/RAP document was published May 31, 2012 and approved by the Water Board on August 9, 2012. The FS/RAP evaluated the potential remedial actions that could feasibly be taken to address environmental conditions, primarily contaminated soil, at Pier 70 and specified a preferred alternative: capping and compliance with a Risk Management Plan (RMP). The Water Board is the lead environmental regulatory agency for the investigation and remediation at Pier 70, although DPH has been reviewing documents and providing input to the Water Board's approval process.

Risk Management Plan

Thereafter, Port staff and consultants developed a draft RMP for agency (Water Board and DPH), stakeholder, and public review, and submitted a final draft RMP⁸³ to the Water Board in July 2013. The Water Board approved that draft as the final RMP on January 24, 2014. The RMP presents a decision framework and specific protocols for managing chemicals in soil and groundwater within the Pier 70 area, including the project site, to protect human health and the environment. These management measures are consistent with existing and future land uses, and appropriate for a phased redevelopment that is planned to occur over many years. The Port, future developers and tenants, including those in the 20th Street Historic Core, would use the RMP to manage potential risks associated with site conditions.

The proposed project would be required to remediate potential soil contamination described above in accordance with the RMP that was approved by the Water Board. The Water Board would continue to have regulatory oversight over implementation of the RMP and ensures compliance through notification and reporting requirements, in which DPH is included, imposed on the Port and its tenants. The Water Board holds the Port ultimately responsible for implementation of the RMP, so in the event that a tenant or the Port itself fails to comply with the RMP, then the Port would be accountable.

Therefore, the proposed project would not result in significant impacts related to hazards or hazardous materials that were not identified in the Eastern Neighborhoods PEIR. In addition, the Pier 70 Mixed-Use District DEIR included the proposed project in its cumulative analysis and did not identify a significant cumulative impact on hazards and hazardous materials. The proposed project's cumulative impact on hazards and hazardous materials would be less than significant.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
16. MINERAL AND ENERGY RESOURCES—Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

⁸³ Treadwell & Rollo, Inc., 2013. Pier 70 Risk Management Plan – Pier 70 Master Plan Area, July 25.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	☐	☐	☐	☒

The Eastern Neighborhoods PEIR determined that the Area Plan would facilitate the construction of both new residential units and commercial buildings. Development of these uses would not result in use of large amounts of fuel, water, or energy in a wasteful manner or in the context of energy use throughout the City and region. The energy demand for individual buildings would be typical for such projects and would meet, or exceed, current state and local codes and standards concerning energy consumption, including Title 24 of the California Code of Regulations enforced by the Port. The Plan Area does not include any natural resources routinely extracted and the rezoning does not result in any natural resource extraction programs. Therefore, the Eastern Neighborhoods PEIR concluded that implementation of the Area Plan would not result in a significant impact on mineral and energy resources. No mitigation measures were identified in the PEIR.

As the proposed project is within the Eastern Neighborhoods Plan Area, there would be no additional impacts on mineral and energy resources beyond those analyzed in the Eastern Neighborhoods PEIR. In addition, the Pier 70 Mixed-Use District DEIR included the proposed project in its cumulative analysis and did not identify a significant cumulative impact on mineral and energy resources. Therefore, the proposed project's cumulative impact on mineral and energy resources would be less than significant.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
17. AGRICULTURE AND FOREST RESOURCES:—Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)) or timberland (as defined by Public Resources Code Section 4526)?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use?	☐	☐	☐	☒

The Eastern Neighborhoods PEIR determined that no agricultural resources exist in the Area Plan; therefore the rezoning and community plans would have no effect on agricultural resources. No mitigation measures were identified in the PEIR. The Eastern Neighborhoods PEIR did not analyze the effects on forest resources.

As the proposed project is within the Eastern Neighborhoods Rezoning Plan Area, there would be no additional impacts on agriculture and forest resources beyond those analyzed in the Eastern Neighborhoods PEIR. In addition, the Pier 70 Mixed-Use District DEIR included the proposed project in its cumulative analysis and did not identify a cumulative impact on agriculture and forest resources. Therefore, the proposed project would not result in a cumulative impact on agricultural and forest resources.

<i>Topics:</i>	<i>Significant Impact Peculiar to Project or Project Site</i>	<i>Significant Impact not Identified in PEIR</i>	<i>Significant Impact due to Substantial New Information</i>	<i>No Significant Impact not Previously Identified in PEIR</i>
18. MANDATORY FINDINGS OF SIGNIFICANCE—Would the project:				
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b) Have impacts that would be individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☐	☒
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

- A. Project-specific studies were prepared for the proposed project to determine if the project would result in any significant environmental impacts that were not identified in the Eastern Neighborhoods PEIR. As discussed in the various topics in this initial study, and with the exception of historic architectural resources and bats, the proposed project would result in less-

than-significant impacts with implementation of applicable mitigation measures from the Eastern Neighborhoods PEIR. As described in Section F.3, Cultural Resources, the proposed project could result in a substantial adverse change on historic architectural resources, an impact that is specific to the project proposal and was not identified in the Eastern Neighborhoods PEIR. However, with implementation of Project Mitigation Measure 1: Documentation and Project Mitigation Measure 2: Performance Standards, this impact would be reduced to a less-than-significant level. As described in Section F.12, Biological Resources, the proposed project could result in direct mortality of or indirect disturbance to roosting special-status bats, which is an impact that is specific to the project proposal and was not identified in the Eastern Neighborhoods PEIR. However, with implementation of Project Mitigation Measure 10: Avoidance and Minimization Measures for Bats, this impact would be reduced to a less-than-significant level.

- B. The proposed project in combination with the past, present and foreseeable projects as described in Section F, *Evaluation of Environmental Effects*, would not result in a considerable contribution to cumulative impacts related to land use, population and housing, cultural resources, transportation and circulation, noise, air quality, greenhouse gas emissions, wind and shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, hazards and hazardous materials, mineral and energy resources, and agricultural and forest resources with implementation of identified mitigation. The proposed project would not result in a cumulative contribution to potentially significant cumulative impacts that were not identified in the Eastern Neighborhoods PEIR.
- C. The proposed project would not result in effects on the environment that are peculiar to the project or the project site that were not identified as significant effects in the Eastern Neighborhoods PEIR, with the exception of historic architectural resources. As described in Section F.3, Cultural Resources, two mitigation measures (Project Mitigation Measure 1: Documentation and Project Mitigation Measure 2: Performance Measures) were identified that would reduce the historic architectural resources impact to a less-than-significant level. Therefore, the proposed project does not have the potential to result in significant impacts that could adversely affect human beings. The Eastern Neighborhoods PEIR and this project-specific initial study comprise the full and complete CEQA evaluation necessary for the proposed project.

G. MITIGATION AND IMPROVEMENT MEASURES

Project Mitigation Measure 1: Documentation

Before demolishing Buildings 40 and 117, the project sponsor shall retain a professional that meets the Secretary of the Interior's Professional Qualifications Standards for Architectural History to prepare written and photographic documentation of Buildings 40 and 117. The documentation shall be prepared consistent with Historic American Building Survey (HABS) guidelines published by the National Park Service (NPS). The HABS documentation shall be submitted to the Planning Department historic preservation staff for review and approval prior to transmittal to the Northwest Information Center of the California Information Resource System and the History Room at the San Francisco Main Public Library. Demolition of Buildings 40 and 117 shall not be authorized by the Port until Planning has approved the HABS documentation.

Project Mitigation Measure 2: Performance Measures

Qualified staff from the Port of San Francisco, who meets the Secretary of the Interior's Professional Qualification Standards in Historic Architecture or Architectural History, shall review all proposed tenant improvements and alterations for consistency with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The review of tenant improvement work by Port staff shall include an analysis of the potential impact of the work on the character-defining features of each contributing resource as detailed in the UIW Historic District National Register nomination. These evaluations shall also consider the Significance Diagrams that were prepared for each resource as a part of the prior Historic Resource Evaluation (HRE) analysis conducted for environmental review that supported the issuance of a CPE by the Planning Department in 2014 (Case No. 2013.1168E). The HRE analysis is used to determine whether proposed work would impact important features, finishes and spatial relationships that characterize a resource. This analysis and all related tax credit project approvals issued by the National Park Service would be considered by Port staff in their finding of project consistency with the Secretary's Standards. In cases of disagreement between parties as to whether the proposed construction, rehabilitation and alteration meets the Secretary's Standards Port staff shall consult with Planning Department Preservation staff, or a may seek review of the scope of work by a third party historic preservation consultant (who meets or exceeds the Secretary of the Interior's Professional Qualification Standards in Historic Architecture or Architectural History, and has demonstrated experience with maritime resources), or OHP and NPS. In cases where a final determination has been made that the Secretary's Standard are not met, the specific tenant improvement or alteration must be redesigned to meet these Standards.

Based on the preliminary conceptual architectural drawings prepared for the prior HRE analysis in support of the issuance of the CPE for the historic renovation of the core and shell of all eight contributing resources (Case No. 2013.1168E), and the conditional approval of the Rehabilitation Tax Credit application, it appears that the project has the potential to meet the Secretary's Standards. However, given the level of available information, design and performance criteria for tenant improvement scopes not previously evaluated in the prior environmental document (Case No. 2013.1168E) must be incorporated to reduce significant impacts on historic resources to a less-than-significant level. These design and performance measures include:

- The project sponsor's Historic Architect(s) for tenant improvements shall meet the Secretary of the Interior's Qualification Standards in Historic Architecture, and the Port shall utilize the Secretary of the Interior's Standards for the Treatment of Historic Properties to assess impacts on the historic resources, and will consider prior related National Park Service project approvals when evaluating specific tenant improvement proposal. In working with the project sponsor, the Port shall implement the project or an alternative that provides the greatest level of consistency with the criteria, and on balance has the least impact.
- Future tenant improvements in each of the contributing resources shall maintain the core and shell as previously evaluated in the prior environmental document (Case No. 2013.1168E) and conditionally approved by NPS as a part of the Rehabilitation Tax Credit process unless otherwise approved by the Port and Planning Department.

- Interior buildout for tenant improvements not previously evaluated in the prior environmental document (Case No. 2013.1168E) shall allow the introduction of mezzanines provided the total new floor area shall be limited to a maximum of one third of the total floor area or floor plate, whichever is less, and shall maintain historic interior volumes and character defining spatial relationships.
- Interior subdivision of floor area shall be maintained where feasible to preserve the historic volume and visual access of the interior by discouraging full height partitions and demising walls.
- Tenant improvements not previously evaluated in the prior environmental document (Case No. 2013.1168E), shall maintain existing window and door openings and their historic ingress and egress functions. The conversion or expansion of openings to serve new functions shall be discouraged and allowed only in cases where the applicant can demonstrate that alternate less impactful means to accommodate new or expanded functions were considered and determined infeasible, and the impacts to the exterior are limited to secondary elevations of the contributing resource. The installation of glazed storefront systems within existing cargo openings may be allowed provided that historic door assemblies that survive are maintained in a fixed open position.
- HVAC, photovoltaic and skylight installations may be allowed provided such installations are not highly visible within the historic district and maintain a low profile. HVAC installations shall be located within the building envelop of the contributing resource whenever possible and skylights shall be limited to a maximum of 25 percent of the total roof area of the resource. Installation of rooftop HVAC, photovoltaic and skylight improvements shall maintain the roof profile and not remove historic appurtenances that contribute to the character of the resource.
- The introduction of disabled access on the exterior and interior of contributing resources shall be done in a manner that minimizes alteration, construction and interventions, thereby protecting character defining features. For Port properties accessibility requirements are administered by the Port Harbor Engineer. Determinations about alternate means of compliance through the use of the accessibility requirements of the California Historical Building Code (CHBC) are made on a case-by-case basis and seek to protect significant historic features and materials. The project sponsors shall consult early in the design process with the Port's Chief Harbor Engineer to obtain a determination of occupancy classification for proposed uses and guidance on acceptable approaches to meet applicable accessibility requirements that are sensitive to the historical integrity of the resource.
- Building additions may be considered provided they are subordinate in scale and height to the subject resource. Additions shall be limited to no more than 25 percent of the square-footage or floor plate of the contributing resource, one story lower in height and are designed to appear to be freestanding with minimal connection to the resource. Additions shall not obscure primary elevations or character defining window or door openings of the resource.

- Signage and exterior lighting shall be addressed in a comprehensive program developed for each resource. Signage location, types, size and height maximums are addressed in the Port's Sign Policy. Port staff reviews signage involving historic resources using both the Port Sign Policy and the Secretary's Standards. Signage and lighting programs for Buildings 102, 113-114 and 115-116 will be reviewed taking into account the specific context of each resource type, location and the proposed use. Since the UIW Historic District is characterized by its former industrial past and the on-going ship repair operations simple, utilitarian non-illuminated wall and blade signs and signs that emulate historic signage are recommended, while highly designed and internally illuminated signs are not allowed.

Project Mitigation Measure 3 – Properties with No Previous Studies (Mitigation Measure J-2 in the Eastern Neighborhoods PEIR)

Based on the reasonable potential that archeological resources may be present within the project site, the following requirement shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of an archaeological consultant from the rotational Department Qualified Archaeological Consultants List (QACL) maintained by the Planning Department archaeologist. The project sponsor shall contact the Department archaeologist to obtain the names and contact information for the next three archeological consultants on the QACL. The archeological consultant shall undertake an archeological monitoring program. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the Environmental Review Officer (ERO) for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c).

Archeological monitoring program (AMP). The archeological monitoring program shall minimally include the following provisions:

- The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the project archeologist shall determine what project activities shall be archeologically monitored. In most cases, any soils disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, site remediation, etc., shall require archeological monitoring because of the potential risk these activities pose to archaeological resources and to their depositional context;
- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;
- The archaeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with the archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;

- The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archeological deposit is encountered, all soils disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/construction crews and heavy equipment until the deposit is evaluated. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall, after making a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, present the findings of this assessment to the ERO.

Consultation with Descendant Communities: On discovery of an archeological site⁸⁴ associated with descendant Native Americans or the Overseas Chinese an appropriate representative⁸⁵ of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to consult with ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Final Archaeological Resources Report shall be provided to the representative of the descendant group.

If the ERO in consultation with the archeological consultant determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

- A) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or
- B) An archeological data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

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

The scope of the ADRP shall include the following elements:

⁸⁴ By the term "archeological site" is intended here to minimally included any archeological deposit, feature, burial, or evidence of burial.

⁸⁵ An "appropriate representative" of the descendant group is here defined to mean, in the case of Native Americans, any individual listed in the current Native American Contact List for the City and County of San Francisco maintained by the California Native American Heritage Commission and in the case of the Overseas Chinese, the Chinese Historical Society of America.

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

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

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

Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound, one unbound and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.

Project Mitigation Measure 4 – Construction Noise (Based on Mitigation Measure F-2 in the *Eastern Neighborhoods PEIR*)

For new exterior construction and demolition work, the project sponsor is required to develop a set of site-specific noise attenuation measures under the supervision of a qualified acoustical consultant. Prior to commencing construction, a plan for such measures shall be submitted to the Port Harbor Engineer to ensure that maximum feasible noise attenuation will be achieved. These attenuation measures shall include as many of the following control strategies as feasible:

- Erect temporary plywood noise barriers around a construction site, particularly where a site adjoins noise-sensitive uses;
- Utilize noise control blankets on a building structure as the building is erected to reduce noise emission from the site;
- Evaluate the feasibility of noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings housing sensitive uses;
- Monitor the effectiveness of noise attenuation measures by taking noise measurements;
- Post signs on-site pertaining to permitted construction days and hours and complaint procedures and who to notify in the event of a problem, with telephone numbers listed.

Project Mitigation Measure 5 - Siting of Noise-Generating Uses (Based on Mitigation Measure F-5 in the *Eastern Neighborhoods PEIR*)

The project sponsor shall ensure that noise-reduction measures are incorporated into the project design's proposed noise sources to ensure that interior noise standards for the proposed residential unit, as a result of these noise sources, do not exceed 45 dBA during nighttime hours or 55 dBA during daytime hours. Noise-reduction measures shall be incorporated into building plans and approved by the Port Harbor Engineer prior to the beginning of construction.

Project Mitigation Measure 6: Noise Control Plan for Special Outdoor Amplified Sound (Based on Mitigation Measure F-5 in the *Eastern Neighborhoods PEIR*)

The project sponsor shall develop and implement a Noise Control Plan for operations at the proposed entertainment venues to reduce the potential for noise impacts from public address and/or amplified music. This Noise Control Plan shall contain the following elements:

- The project sponsor shall comply with noise controls and restrictions in applicable entertainment permit requirements for outdoor concerts.
- Speaker systems shall be directed away from the nearest sensitive receptors to the degree feasible.
- Outdoor speaker systems shall be operated consistent with the restrictions of Section 2909 of the San Francisco Police Code, and conform to a performance standard of 8 dBA and dBC over existing ambient L90 noise levels at the nearest residential use.

Project Mitigation Measure 7 – Construction Emissions Minimization (Based on Mitigation Measure G-1 in the Eastern Neighborhoods PEIR)

The project sponsor or the project sponsor's Contractor shall comply with the following

A. Engine Requirements.

1. All off-road equipment greater than 25 hp and operating for more than 20 total hours over the entire duration of construction activities shall have engines that meet or exceed either U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 2 off-road emission standards, and have been retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy. Equipment with engines meeting Tier 4 Interim or Tier 4 Final off-road emission standards automatically meet this requirement.
2. Where access to alternative sources of power are available, portable diesel engines shall be prohibited.
3. Diesel engines, whether for off-road or on-road equipment, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions). The Contractor shall post legible and visible signs in English, Spanish, and Chinese, in designated queuing areas and at the construction site to remind operators of the two minute idling limit.
4. The Contractor shall instruct construction workers and equipment operators on the maintenance and tuning of construction equipment, and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications.

B. Waivers.

1. The Planning Department's Environmental Review Officer or designee (ERO) may waive the alternative source of power requirement of Subsection (A)(2) if an alternative source of power is limited or infeasible at the project site. If the ERO grants the waiver, the Contractor must submit documentation that the equipment used for onsite power generation meets the requirements of Subsection (A)(1).
2. The ERO may waive the equipment requirements of Subsection (A)(1) if: a particular piece of off-road equipment with an ARB Level 3 VDECS is technically not feasible; the equipment would not produce desired emissions reduction due to expected operating modes; installation of the equipment would create a safety hazard or impaired visibility for the operator; or, there is a compelling emergency need to use off-road equipment that is not retrofitted with an ARB Level 3 VDECS. If the ERO grants the waiver, the Contractor must use the next cleanest piece of off-road equipment, according to Table below.

Table – Off-Road Equipment Compliance Step-down Schedule

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

How to use the table: If the ERO determines that the equipment requirements cannot be met, then the project sponsor would need to meet Compliance Alternative

1. If the ERO determines that the Contractor cannot supply off-road equipment meeting Compliance Alternative 1, then the Contractor must meet Compliance Alternative 2. If the ERO determines that the Contractor cannot supply off-road equipment meeting Compliance Alternative 2, then the Contractor must meet Compliance Alternative 3.

** Alternative fuels are not a VDECS.

- C. *Construction Emissions Minimization Plan.* Before starting on-site construction activities, the Contractor shall submit a Construction Emissions Minimization Plan (Plan) to the ERO for review and approval. The Plan shall state, in reasonable detail, how the Contractor will meet the requirements of Section A.
1. The Plan shall include estimates of the construction timeline by phase, with a description of each piece of off-road equipment required for every construction phase. The description may include, but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For VDECS installed, the description may include: technology type, serial number, make, model, manufacturer, ARB verification number level, and installation date and hour meter reading on installation date. For off-road equipment using alternative fuels, the description shall also specify the type of alternative fuel being used.
 2. The project sponsor shall ensure that all applicable requirements of the Plan have been incorporated into the contract specifications. The Plan shall include a certification statement that the Contractor agrees to comply fully with the Plan.
 3. The Contractor shall make the Plan available to the public for review on-site during working hours. The Contractor shall post at the construction site a legible and visible sign summarizing the Plan. The sign shall also state that the public may ask to inspect the Plan for the project at any time during working hours and shall explain how to request to inspect the Plan. The Contractor shall post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way.
- D. *Monitoring.* After start of Construction Activities, the Contractor shall submit quarterly reports to the ERO documenting compliance with the Plan. After completion of construction activities and prior to receiving a final certificate of occupancy, the project sponsor shall submit to the ERO a final report

summarizing construction activities, including the start and end dates and duration of each construction phase, and the specific information required in the Plan.

Project Mitigation Measure 8 – Siting of Uses that Emit DPM (Mitigation Measure G-3 in the *Eastern Neighborhoods PEIR*)

To minimize potential exposure of sensitive receptors to diesel particulate matter (DPM), for new tenants that would be expected to be served by at least 100 trucks per day or 40 refrigerated trucks per day, based on the ARB Air Quality and Land Use Handbook, the Planning Department shall require that such uses generating substantial DPM emissions (defined as an excess cancer risk of 7/million or PM 2.5 levels at or above 0.2 ug/m³ at the closest sensitive receptor) be located no less than 1,000 feet from residential units and other sensitive receptors, including schools, children's day care centers, hospitals, nursing and convalescent homes, and like uses.

Project Mitigation Measure 9 – Siting of Uses that Emit Other TACs (Mitigation Measure G-4 in the *Eastern Neighborhoods PEIR*)

For new tenants that would be expected to generate toxic air contaminants (TACs) as part of everyday operations, the Planning Department shall require the preparation of an analysis that includes, at a minimum, a site survey to identify residential or other sensitive uses within 1,000 feet of the project site, prior to the first project approval action. This measure shall be applicable, at a minimum, to the following uses: generators, dry cleaners; drive-through restaurants; gas dispensing facilities; auto body shops; metal plating shops; photographic processing shops; textiles; apparel and furniture upholstery; leather and leather products; appliance repair shops; mechanical assembly cleaning; printing shops; hospitals and medical clinics; biotechnology research facilities; warehousing and distribution centers; and any use served by at least 100 trucks per day. Where such uses are located within 1,000 feet of a sensitive receptor, such equipment must comply with the Best Available Control Technologies to reduce DPM and TACs.

Project Mitigation Measure 10 – Mitigation Measure M-BI-2: Avoidance and Minimization Measures for Bats

For Buildings 40 and 117 that are proposed for demolition, a qualified biologist (as defined by CDFW⁸⁶) who is experienced with bat surveying techniques (including auditory sampling methods), behavior, roosting habitat, and identification of local bat species shall be consulted prior to demolition activities to conduct a pre-construction habitat assessment of the project site (focusing on buildings to be demolished or relocated) to characterize potential bat habitat and identify potentially active roost sites. No further action is required should the preconstruction habitat assessment not identify bat habitat or signs of potentially active bat roosts within the project site (e.g., guano, urine staining, dead bats, etc.). The following measures shall be implemented should potential roosting habitat or potentially active bat roosts be identified during the habitat assessment in buildings to be demolished or relocated under the Proposed Project:

⁸⁶ CDFW defines credentials of a "qualified biologist" within permits or authorizations issued for a project. Typical qualifications include a minimum of five years of academic training and professional experience in biological sciences and related resource management activities, and a minimum of two years of experience conducting surveys for each species that may be present within the project area.

- a) In areas identified as potential roosting habitat during the habitat assessment, initial building demolition and renovation shall occur when bats are active, approximately between the periods of March 1 to April 15 and August 15 to October 15, to the extent feasible. These dates avoid the bat maternity roosting season and period of winter torpor.⁸⁷
- b) Depending on temporal guidance as defined below, the qualified biologist shall conduct pre-construction surveys of potential bat roost sites identified during the initial habitat assessment no more than 14 days prior to building demolition or renovation.
- c) If active bat roosts or evidence of roosting is identified during pre-construction surveys, the qualified biologist shall determine, if possible, the type of roost and species. A no-disturbance buffer shall be established around roost sites until the qualified biologist determines they are no longer active. The size of the no disturbance buffer would be determined by the qualified biologist and would depend on the species present, roost type, existing screening around the roost site (such as dense vegetation or a building), as well as the type of construction activity that would occur around the roost site. If special-status bat species or maternity or hibernation roosts are detected during these surveys, appropriate species- and roost-specific avoidance and protection measures shall be developed by the qualified biologist in coordination with CDFW. Such measures may include postponing the removal or renovation of buildings, establishing exclusionary work buffers while the roost is active (e.g., 100-foot no disturbance buffer), or other compensatory mitigation.
- d) The qualified biologist shall be present during building demolition and renovation activities if potential bat roosting habitat or active bat roosts are present.
- e) The demolition or renovation of buildings containing or suspected to contain bat roosting habitat or active bat roosts shall be done under the supervision of the qualified biologist. When appropriate, buildings shall be partially dismantled to significantly change the roost conditions, causing bats to abandon and not return to the roost, likely in the evening and after bats have emerged from the roost to forage. Under no circumstances shall active maternity roosts be disturbed until the roost disbands at the completion of the maternity roosting season or otherwise becomes inactive, as determined by the qualified biologist.

Project Mitigation Measure 11 – Hazardous Building Materials (Mitigation Measure L-1 in the *Eastern Neighborhoods PEIR*)

The project sponsor shall ensure that any equipment containing PCBs or DEPH, such as fluorescent light ballasts, are removed and properly disposed of according to applicable federal, state, and local laws prior to the start of renovation, and that any fluorescent light tubes, which could contain mercury, are similarly removed and properly disposed of. Any other hazardous materials identified, either before or during work, shall be abated according to applicable federal, state, and local laws.

⁸⁷ Torpor refers to a state of decreased physiological activity with reduced body temperature and metabolic rate.

The project sponsor has agreed to implement all of the following improvement measures:

Project Improvement Measure 1 – Develop Additional Pedestrian and Roadway Treatments

The Port should provide additional pedestrian treatments to assure safe passage of pedestrians throughout the project site and reduce and/or eliminate any vehicle-pedestrian conflicts. Such treatments include:

- High-visibility crosswalks (e.g., continental, transverse, and/or ladder marking pattern) at the intersection of 20th Street and Georgia Street. Installation of crosswalks will provide enhanced pedestrian circulation and connectivity between buildings north and south of 20th Street;
- Installation of ADA-accessible ramps at all proposed crosswalk locations and at a safe distance from any on-street loading zone;
- Installation of STOP signs along the northbound Michigan Street approach and northbound Louisiana Street approach;
- Additional signage and notifications within the courtyard area to better guide pedestrians attempting to access various buildings from the courtyard area and to maintain a safe distance from any parked or moving vehicles within the courtyard area. Special pavement markings may be installed to delineate the pedestrian walkway within the courtyard area.
- Additional signage along the loading dock areas to inform non-authorized personnel that traversing these areas is strictly prohibited and proper signage should guide non-authorized personnel to the nearest appropriate path of travel.

All pedestrian treatments should be constructed in accordance with the California Manual on Uniform Traffic Control Devices (MUTCD). Such pedestrian treatments may require approvals by the Port of San Francisco, San Francisco Planning Department, Department of Public Works, and SFMTA's Livable Streets Subdivision, as appropriate.

Project Improvement Measure 2 – Designate Safe, Accessible, and Convenient Bicycle Parking

The project sponsor should locate bicycle parking in an appropriate distance from nearby roadways or loading zones, install bicycle parking in locations that are highly visible for bicyclists, and design bicycle parking that allows for ease of access in and out of these bicycle parking areas. The project sponsor should encourage future building tenants to provide adequate space for Class 1 bicycle parking and to provide bicycle parking that is covered, secured and accessible for employees. The project sponsor should install Class 2 bicycle spaces along sidewalks and/or open space with adequate spacing and/or install bicycle corrals to provide an adequate number of bicycle parking spaces within a concentrated area that is at a safe, convenient distance from moving vehicles. Appropriate signage should also be installed to notify bicyclists of these on-site bicycle parking areas.

Project Improvement Measure 3 – Designate Loading Dock Manager

The project sponsor should require each building tenant to designate a loading dock manager(s) to schedule and/or direct loading vehicles, as appropriate.

Project Improvement Measure 4 – Require Traffic Controllers/Flaggers for Larger Deliveries

During deliveries that require oversized vehicles that require the use of on-site loading dock facilities, or for deliveries that would occur in the presence of high volumes of pedestrian or bicycle traffic, the project sponsor should require tenants to use flaggers to guide vehicles through and/or around the loading zones as well as guide vehicles along public roadways (e.g., 20th, Michigan, Georgia, and Louisiana Streets).

Project Improvement Measure 5 – Limit Peak Hour Truck Movements

The project sponsor shall limit truck movements to the hours between 9:00 a.m. and 3:30 p.m. (or other times, if approved by SFMTA) to further minimize disruption of the general traffic flow on adjacent streets during the a.m. and p.m. peak periods.

Project Improvement Measure 6 – Develop Construction Management Plan

The project sponsor, the Port of San Francisco, and their construction contractor(s) should meet with the Sustainable Streets Division of the SFMTA, the Fire Department, Muni, and the Planning Department to determine feasible measures to reduce traffic congestion, including potential transit disruption, and pedestrian circulation impacts during construction of the project. To minimize cumulative traffic impacts due to project construction, the project sponsor should coordinate with construction contractors for any concurrent nearby projects (e.g., along Illinois Street, between 18th and 19th Streets, and other parts of Pier 70) that are planned for construction or which later become known.

Project Improvement Measure 7 – Encourage Transit Access for Construction Workers

The construction contractor should include methods to encourage transit use to the project site by construction workers in the Construction Management Plan.

Project Improvement Measure 8 – Provide Project Construction Updates

The project sponsor should provide regularly-updated information (typically in the form of community meetings, website, news articles, on-site posting, etc.) regarding project construction and schedule, as well as contact information for specific construction inquiries or concerns.

Project Improvement Measure 9 – Transportation Management Plan*Metrics/Monitoring/Evaluation*

- o Orton Development, Inc. (ODI) or the Port should provide a TMP coordinator for the site to ensure the following TMP is implemented.
- o ODI should require sub-tenant compliance with TMP to make sure employers on site are offering commuter check benefits to employees, per City requirements.

- o ODI should work with SFMTA and/or the Planning Department to establish quantitative mode share or non-automobile share targets for all trip purposes for workers and visitors to the site.
- o ODI should send out an annual travel behavior survey to employers and should share its report and collected responses with the City.
- o In Port-operated lots that serve the project, parking operators should collect data on traffic and parking occupancy during peak commute and peak events annually and report to the Planning Department and/or SFMTA.

Transit and Ride Sharing Incentives

- o ODI and the Port should require sub-tenants to adopt a transit-oriented program that promotes transit and ride sharing options before occupancy.
- o ODI should encourage tenant employees and the general public to commute to work on Muni, Caltrain, and BART.
- o ODI should require tenants to provide 1 partially- or fully-subsidized Muni Fast Pass or similar reasonable financial contribution to a transit Muni Fast Pass/Clipper Card for each employee in addition to the sub-tenant/employer compliance with the City's Commuter Benefits ordinance.
- o ODI should require that all future tenants register for San Francisco's free Emergency Ride Home program.
- o ODI should provide transit-planning tools (maps and Wayfinding information) in public spaces and common areas in coordination with site-wide wayfinding and historic interpretation.

Bicycling Incentives

- o ODI should provide secure Class I and/or Class II bicycle parking in a manner that meets the planning code requirements.
- o For this project, ODI should provide a minimum of 33 Class 1 bicycle parking spaces and 30 Class 2 bicycle parking spaces as required in SF Planning Code, Section 155.2 and 155.3. The location of the bicycle parking is expected to be in the project courtyard and in areas north of Buildings 101, 102, and 104. The exact locations are being determined and will be submitted for Port schematic review. As required by Planning code 155.1(e)(4), "All plans will indicate the "location, dimensions, and type of bicycle parking facilities to be provided, including the model or design of racks to be installed and the dimensions of all aisle, hallways, or routes used to access the parking."
- o The Port and ODI should agree to coordinate with SFMTA and SF Bike Share representatives to discuss the potential of installing a Pier 70 20th Street Historic Buildings SF Bike Share Station.
- o ODI should provide tire inflation and quick repair stations.
- o ODI should provide on-site bicycles for subtenants and employers to use that are not open to the public.
- o ODI should sponsor and promote on-site bicycle education and bicycle safety classes annually.

Car Sharing, Carpool, and Vanpool Incentives

- o The Port operated parking lot at 20th and Illinois streets should provide premium parking locations for carshare vehicles to meet the requirements of San Francisco Planning Code Ordinance 286-10, which states that projects that provide more than 10 spaces for non-residential uses must dedicate 5% of these spaces, rounded down to the nearest whole number, to short-term, transient use by vehicles from certified car sharing organizations per Section 166, which include vanpool, rideshare, taxis, or other co-operative auto programs.
- o Once tenants are identified, ODI should work to encourage car share memberships and user discounts for on-site businesses.
- o ODI and the Port should provide premium-parking locations for visiting carpool and vanpool at the Port operated lot located at 20th/Illinois Streets, in the western portion of the project site west of Michigan Street.
- o ODI and the Port should provide premium passenger loading zone locations in the form of marked curbs.
- o ODI should require tenants to utilize, when possible, car share programs such as Ride Share Match through 511.org.

Parking Management

- o Parking should be unbundled from the leasing of commercial/office spaces.
- o ODI and Port should charge market rates for all parking.
- o ODI should coordinate with the Port of San Francisco to designate appropriate loading and unloading passenger zones as well as short-term parking zones to reduce congestion along 20th Street, Louisiana Street and Michigan Street. The Port should review and approve the final plan. The Port will approve the color curbs for this project.

Walking & Pedestrian Safety

- o ODI should encourage future tenant employees to walk to work by providing wayfinding signage and clear and accessible information to walking maps.
- o ODI should study dumpster and compost container locations and consider service and small truck delivery routes to reduce effects on pedestrian flow.
- o ODI should coordinate with the Port to provide safe paths of travel for pedestrians along 20th, Georgia, Michigan, and Illinois, Streets. The Port should review and approve the final plan.
- o Primary pedestrian path of travel to Buildings 114/115/116 and Building 14 will be through the Atrium in Building 113 that will be publicly accessible.
- o ODI should include in its subleases rules on loading and truck use of the plaza to minimize effects on pedestrians while supporting industrial tenant needs for truck loading and unloading.

Emergency vehicles

- o ODI should continue to coordinate with the Port Fire Marshal to meet turn-around requirements and coordinate emergency vehicle access with traffic and pedestrian flow.

Project Improvement Measure 10 – Event-Related Transportation Demand Management

- The project sponsor should participate as a member of the Mission Bay Ballpark Transportation Coordination Committee (MBBTCC) and provide at least one month notification prior to the start of any large event with 1,000 to 5,000 attendees that would overlap with an event at the Warriors arena. The City and the project sponsor should meet to discuss transportation and scheduling logistics for occasions with multiple events in the area.
 - For large events that may generate substantial demand for passenger loading in excess of regular (non-event) conditions (and could result in disruptions to traffic, bicycle, and pedestrian circulation along 20th Street and other nearby streets), the project sponsor or event sponsor should consider applying for temporary signage through the Port to convert on-street parking in the immediate vicinity of the project site into additional space for event-related passenger loading.
 - Provide general transit information (e.g., directions to/from key transit hubs, route schedules, fares) to event sponsors for distribution to event attendees, and encourage attendees to take transit, bike, or walk when traveling to/from the event. If necessary, provide general information about nearby public parking facilities (e.g., maps, directions, rates, etc.) to event sponsors for distribution to event attendees.
 - For events that could generate between 1,000 to 5,000 attendees, the project sponsor or event sponsor should provide a traffic plan. The project sponsor or event sponsor should communicate with "for hire-vehicles", such as Lyft and Uber, regarding preferred traffic routes to the event. Directional signs should be in place. In addition, the project sponsor or event sponsor should have a hotline for event operational and transportation issues on event nights.
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H. PUBLIC NOTICE AND COMMENT

A "Notification of Project Receiving Environmental Review" was mailed on September 8, 2016 to adjacent occupants and owners of properties within 300 feet of the project site. No comments were received.

I. DETERMINATION

On the basis of this initial study – community plan evaluation:

- ☐ I find that the proposed project is consistent with the development density established for the project site in the Eastern Neighborhoods Area Plans, the project sponsor will undertake feasible mitigation measures specified in the Eastern Neighborhoods PEIR to mitigate project-related significant effects, and the project would not result in environmental effects not already identified as significant effects in the Eastern Neighborhoods PEIR. A CERTIFICATE OF DETERMINATION-COMMUNITY PLAN EVALUATION will be prepared.
- ☒ I find that the proposed project is consistent with the development density established for the project site in the Eastern Neighborhoods Area Plans, the project sponsor will undertake feasible mitigation measures specified in the Eastern Neighborhoods PEIR to mitigate project-related significant effects, and although the proposed project could have a significant effect on the environment not previously identified in the Eastern Neighborhoods PEIR, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project is consistent with the development density established for the project site in the Eastern Neighborhoods Area Plans, the project sponsor will undertake feasible mitigation measures specified in the Eastern Neighborhoods PEIR to mitigate project-related significant effects, and at least one effect of the project has not been previously identified in the Eastern Neighborhoods PEIR and is either 1) peculiar to the project or the project site, 2) is a potentially significant off-site or cumulative impact, or 3) is a significant effect resulting from substantial new information that was not known at the time the PEIR was certified and would be more a more severe effect than was analyzed and disclosed in the PEIR. An ENVIRONMENTAL IMPACT REPORT is required.



Lisa Gibson
Environmental Review Officer
for
John Rahaim
Director of Planning

DATE 6/14/17

J. INITIAL STUDY-COMMUNITY PLAN EVALUATION PREPARERS

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