DRAFT ENVIRONMENTAL IMPACT REPORT

1629 Market Street Mixed-Use Project

PLANNING DEPARTMENT
CASE NO. **2015-005848ENV**

STATE CLEARINGHOUSE NO. 2017022026

	Draft EIR Publication Date:	**May 10, 2017**
	Draft EIR Public Hearing Date:	**June 15, 2017**
	Draft EIR Public Comment Period:	**May 11, 2017–June 26, 2017**

SAN FRANCISCO
PLANNING
DEPARTMENT

Written comments should be sent to:
Don Lewis, EIR Coordinator | 1650 Mission Street, Suite 400 | San Francisco, CA 94103 or don.lewis@sfgov.org

SAN FRANCISCO
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TO: Distribution List for the 1629 Market Street Mixed-Use Project

FROM: Don Lewis, EIR Coordinator

Re: Final Environmental Impact Report for the 1629 Market Street Mixed-Use Project (Case No. 2015-005848ENV)

This is the Draft of the Environmental Impact Report (EIR) for the 1629 Market Street Mixed-Use Project. A public hearing will be held on the adequacy and accuracy of this document. After the public hearing, our office will prepare and publish a document entitled "Response to Comments," which will contain a summary of all relevant comments on this Draft EIR and our responses to those comments, along with copies of the letters and emails received and a transcript of the public hearing. The Response to Comments document may also specify changes to this Draft EIR. Public agencies and members of the public who testify at the hearing on the Draft EIR will receive a link to the Response to Comments document on the Environmental Planning Division webpage, along with notice of the date reserved for certification; others may receive such copies and notice on request or by visiting our office. This Draft EIR, together with the Response to Comments document, will be considered by the Planning Commission in an advertised public meeting, and then certified as a Final EIR if deemed adequate.

If you receive a copy of the Response to Comments document in addition to this copy of the Draft EIR, you will technically have a copy of the Final EIR.

Thank you for your interest in this project.

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ACRONYMS AND ABBREVIATIONS

2010 CAP	2010 Clean Air Plan
ABAG	Association of Bay Area Governments
ADA	Americans with Disabilities Act
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
CAP	Clean Air Plan
CCR	California Code of Regulations
CD	compact disc
CEQA	California Environmental Quality Act
CMP	Congestion Management Plan
DPR	California Department of Parks and Recreation
EIR	environmental impact report
EP	San Francisco Planning Department, Environmental Planning Division
FHWA	Federal Highway Administration
GHG	greenhouse gas
gsf	gross square feet
HPC	San Francisco Historic Preservation Commission
HRER	Historic Resources Evaluation Responses
I-#	Interstate #
I-280	Interstate 280
I-80	Interstate 80
IS	initial study
ISCOTT	Interdepartmental Staff Committee on Traffic and Transportation
ITE	Institute of Transportation Engineers
LEED	Leadership in Energy and Environmental Design
LOS	Level of Service
LTS	less than significant
MTC	Metropolitan Transportation Commission
Muni	San Francisco Municipal Transportation Agency
NACTO	National Association of City Transportation Officials
NI	no impact
NOP	notice of preparation
OHP	Office of Historic Preservation
P	Public Use
PS	potentially significant
Public Works	[San Francisco] Department of Public Works
RPP	Residential Parking Permit
SamTrans	San Mateo County Transit District
sf	square feet
SFFD	San Francisco Fire Department
SFMTA	City and County of San Francisco Municipal Transportation Agency

SFPUC	San Francisco Public Utilities Commission
SoMa	South of Market Area
SRO	single-residential occupancy
SU	significant and unavoidable
TASC	Transportation Advisory Staff Committee
TDM	transportation demand management
TIDF	Transit Impact Development Fee
TIS	Transportation Impact Study
TSF	Transportation Sustainability Fee
TSP	Transportation Sustainability Program
TTRP	Travel Time Reduction Proposal
U.S. 101	United States Highway 101
VMT	vehicle miles traveled
WETA	Water Emergency Transportation Authority

SUMMARY

Project Synopsis

The project site occupies approximately 97,617 square feet, or 2.2 acres, on the block bounded by Market, 12th, Otis, and Brady Streets located within the boundaries of San Francisco's Market & Octavia Area Plan, an area plan of the *San Francisco General Plan* (*General Plan*). Most of the site is located within the NCT-3 (Moderate-Scale Neighborhood Commercial Transit) Zoning District, while the southwestern portion of the site, occupying approximately 20,119 square feet is in a P (Public) Zoning District. The portions of the project site north of Stevenson Street and east of Colusa Place are located within an 85-X height and bulk district, while the portion of the project site south of Colton Street is in a 40-X height and bulk district.[1] The project site is currently occupied by four surface parking lots containing 242 parking spaces, an approximately 15-foot-tall Bay Area Rapid Transit (BART) ventilation structure for the below-grade BART tunnel, as well as three buildings: the Civic Center Hotel, the United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry (UA) Local 38 building, and the Lesser Brothers Building.

The proposed project would demolish the existing UA Local 38 building, located at 1621 Market Street, demolish the majority of the Lesser Brothers Building, located at 1629–1645 Market Street, rehabilitate the Civic Center Hotel, located at 1601 Market Street, and demolish the 242-space surface parking lots on the project site. The proposed development would construct a total of five new buildings on the project site, including a new four-story, 58-foot-tall, 27,300-square-foot UA Local 38 building adjacent to the Civic Center Hotel, as well as a 10-story, 85-foot-tall, 187,100-square-foot addition to the Lesser Brothers Building at the corner of Brady and Market Streets containing 198 residential units and 6,600 square feet of ground-floor retail/restaurant space ("Building A"). A 10-story, 85-foot-tall, 118,300-square-foot building containing 136 residential units and 2,500 square feet of ground-floor retail/restaurant space ("Building B") would be constructed on Market Street between the new UA Local 38 building and Building A. A nine-story, 85-foot-tall, 74,700-square-foot building containing 78 residential units would be constructed south of Stevenson Street and north of Colton Street ("Building D"). The five-story, 55-foot-tall Civic Center Hotel would be rehabilitated to contain 65 residential units and 4,000 square feet of ground-floor retail/restaurant space (also referred to as "Building C"), and a new six-story, 68-foot-tall, 50,900-square-foot Colton Street Affordable Housing building containing up to 107 affordable units would be constructed south of Colton Street as part of the proposed project. The proposed project would construct the new 18,300-square-foot Brady Open Space at the northeast corner of Brady and Colton Streets. In addition, the proposed project would include construction of a two-level, below-grade garage with up to 316 parking spaces (some of which may include the use of stackers) accessible from Brady and Stevenson Streets. Overall, the proposed project would include construction of 498,100 square feet of residential use that would contain up to 477 residential units and up to 107 affordable units in the Colton Street Affordable

[1] Following San Francisco convention, Market Street and streets parallel to it are considered to run east/west, while 12th Street and streets parallel to it are considered to run north/south.

Housing building.[2] In addition, the proposed project would include 27,300 square feet of union facility use, 13,000 square feet of ground-floor retail/restaurant use, and 32,800 square feet of publicly-accessible as well as residential common open space.

The proposed project would provide on-street loading zones and on-site loading spaces. Three loading zones would be provided on streets adjacent to the project site for the proposed project. A 100-foot commercial and passenger loading zone would be provided on the west side of 12th Street, a 60-foot commercial/passenger loading zone would be provided on the east side of Brady Street north of Stevenson Street, and 40-foot commercial and passenger loading zone would also be provided on the west side of Brady Street north of Colton Street. In addition, four 20-foot-long off-street loading spaces would be provided in the below-grade parking garage under Buildings A and B. A designated 25-foot-long on-site move-in/move-out loading space would also be provided on the project site adjacent to Building D.

The proposed project would entail excavation to a maximum depth of approximately 30 feet to accommodate the two below-grade parking levels and foundation. Phase 1 excavation would total up to approximately 39,700 cubic yards, and Phase 2 would total up to approximately 23,700 cubic yards. The proposed project is anticipated to be constructed on a mat foundation. As discussed under Topic E.13, *Geology and Soils*, in the Initial Study (Appendix A), impact pile driving is not anticipated as part of the proposed project.[3]

The proposed project would be constructed in two sequential phases. Phase 1 would include construction of the Colton Street Affordable Housing building, the new UA Local 38 building, and the building located south of Stevenson Street and north of Colton Street ("Building D"), all of which would be located on existing surface parking lots. In addition, the building on the corner of Market and Brady Streets ("Building A"), including the two-level, below-grade parking garage would also be constructed during Phase 1. The two-level, below-grade parking garage under the adjacent building would be completed in Phase 2. Construction of the building on the corner of Market and Brady Streets would entail demolition of the majority of the Lesser Brothers Building and construction of a 10-story addition behind the portion of the façade along Market Street proposed to be retained. Residents of the Civic Center Hotel would remain onsite during Phase 1 construction, as would employees of the UA Local 38 building. Following the completion of Phase 1 construction, the new buildings would be available for occupancy and current long-term residents of the Civic Center Hotel would have the opportunity to move and relocate into the new Colton Street Affordable Housing building. Phase 2 construction would entail demolition of the existing UA Local 38 building and construction of the building adjacent to the building on the corner of Market and Brady Streets ("Building B") and its below-grade parking garage, and the rehabilitation of the Civic Center Hotel into a mixed-use building with residential use over ground-floor retail/restaurant.

The construction duration for the entire proposed project is estimated to require a total of 44 months. Phase 1 would require 22 months and is anticipated to begin in March 2018, with initial occupancy anticipated to occur by January 2020. Phase 1 would involve demolition and site preparation (including grading and excavation) that would take approximately five months, followed by foundation and below-grade construction requiring

[2] The proposed project would meet the requirements of the City's Residential Inclusionary Affordable Housing Program (*Planning Code* Sections 415 et seq.) by providing market rate and affordable units within the 477 residential units, as well as up to 107 affordable units in the Colton Street Affordable Housing building, as set forth in the Development Agreement.

[3] Langan Treadwell Rollo, *Preliminary Geotechnical Investigation, 1629 Market Street*, July 5, 2016. This document (and all other documents cited in this EIR, unless otherwise noted), is available for review at 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case No. 2015-005848ENV.

two months, then building construction, paving, and architectural coatings would require an additional 11 months, with completion of interiors taking an additional four months.

Phase 2 of the proposed project is anticipated to begin in January 2020 and require 22 months for completion, anticipated by November 2021. Phase 2 would involve demolition and site preparation (including grading and excavation) and would take approximately five months, followed by foundation and below-grade construction requiring two months, then building construction, paving, and architectural coatings would require an additional 11 months, with completion of interiors completion taking an additional four months.

The project sponsor would seek amendments to the Zoning Map Height and Bulk Districts and *San Francisco Planning Code* (*Planning Code*) text amendments to create a new special use district and amendments to the Market & Octavia Area Plan land use and height maps and open space policy language, all of which would require a recommendation by the Planning Commission and approval by the Board of Supervisors. In addition, the project sponsor is seeking approval of a Conditional Use/Planned Unit Development for lot and use size and to allow certain *Planning Code* exceptions. The project sponsor would also seek approval of a Development Agreement with respect to the project sponsor's commitment to develop affordable housing as part of the proposed project and to develop and maintain the Brady Open Space.

Summary of Impacts, Mitigation Measures, and Improvement Measures

This Environmental Impact Report (EIR) analyzes the potential effects of the 1629 Market Street Mixed-Use Project, as determined in the Notice of Preparation (NOP) of an EIR issued February 8, 2017 (Appendix B of this EIR). The Initial Study (Appendix A of this EIR) found that the proposed project would have potentially significant impacts in the areas of cultural resources (specifically historical architectural resources) and transportation and circulation. It also found that the proposed project's impacts on other environmental resource areas either would not be significant or would be less-than-significant with mitigation, or that the proposed project would have no impact.

Table S-1, Summary of Impacts of the Proposed Project—Disclosed in this EIR, summarizes all impacts identified for the proposed project addressed in the environmental review for this EIR, whether the level of significance was found to be no impact, less-than-significant, or significant. For any impacts found to be significant, corresponding mitigation measures are included, where feasible, and the level of significance after mitigation is indicated.

The Initial Study identified resource topics that were determined not to apply to the proposed project and topics where the proposed project would have no impact, a less-than-significant impact, or less-than-significant with mitigation. For any impacts identified as significant in the Initial Study, corresponding mitigation measures are included that would reduce these impacts to a less-than-significant level. These topics, summarized in **Table S-2, Summary of Impacts of the Proposed Project—Disclosed in the Initial Study**, are not addressed in this EIR.

The proposed project would have a project-level significant and unavoidable impact on an historical architectural resource, as well as a cumulative construction-related transportation impact.

TABLE S-1 SUMMARY OF IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THIS EIR

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
Section IV.A, Historical Architectural Resources			
Impact CR-1: The proposed project would cause a substantial adverse change in the significance of the Lesser Brothers Building, a historical resource as defined in CEQA Guidelines Section 15064.5(b).	S	**Mitigation Measure M-CR-1a – HABS Documentation.** To document the Lesser Brothers Building more thoroughly than has been done to date, prior to the start of demolition activities, the project sponsor shall cause to be prepared documentation in accordance with the Historic American Buildings Survey (HABS), a program of the National Park Service. The sponsor shall ensure that documentation is completed according to the HABS standards. The photographs and accompanying HABS Historical Report shall be maintained on-site, as well as in the appropriate repositories, including but not limited to, the San Francisco Planning Department, San Francisco Architectural Heritage, the San Francisco Public Library, and the Northwest Information Center of the California Historical Resources Information System. The contents of the report shall include an architectural description, historical context, and statement of significance, per HABS reporting standards. The documentation shall be undertaken by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate), as set forth by the *Secretary of the Interior's Professional Qualification Standards* (36 Code of Federal Regulations, Part 61). HABS documentation shall provide the appropriate level of visual documentation and written narrative based on the importance of the resource (types of visual documentation typically range from producing a sketch plan to developing measured drawings and view camera (4x5) black and white photographs). The appropriate level of HABS documentation and written narrative shall be determined by the Planning Department's Preservation staff. The report shall be reviewed by the Planning Department's Preservation staff for completeness. In certain instances, Department Preservation staff may request HABS-level photography, a historical report, and/or measured architectural drawings of the existing building(s). **Mitigation Measure M-CR-1b – Interpretive Display.** Prior to the start of demolition, the project sponsor shall work with Planning Department Preservation staff and another qualified professional to design a publicly accessible interpretive display that would memorialize the Lesser Brothers Building, which would be effectively demolished under the proposed project. The contents of the interpretative display shall be approved by Planning Department Preservation staff, and may include the history of development of the project site, including the non-historic Local 38 union hall building and the Civic Center Hotel (and possibly buildings demolished previously), and/or other relevant information. This display could take the form of a kiosk, plaque, or other display method containing panels of text, historic photographs, excerpts of oral histories, and maps. The development of the interpretive display should be overseen by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate) set forth by the *Secretary of the Interior's Professional*	SUM

TABLE S-1 SUMMARY OF IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THIS EIR

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
		Qualification Standards (36 Code of Federal Regulations, Part 61). An outline of the format, location and content of the interpretive display shall be reviewed and approved by Planning Department Preservation staff prior to issuance of a demolition permit or site permit. The format, location and content of the interpretive display must be finalized prior to issuance of the Architectural and Mechanical, Electrical, and Plumbing (MEP) Addendum for the Building A project component. **Mitigation Measure M-CR-1c – Protect On-Site Historical Resources from Construction Activities.** The project sponsor shall incorporate into construction contracts a requirement that the construction contractor(s) use feasible means to avoid damage to on-site historical resources (portion of the Lesser Brothers Building to be retained and Civic Center Hotel). Such methods may include staging of equipment and materials as far as feasible from historic buildings to avoid direct damage; using techniques in demolition, excavation, shoring, and construction that create the minimum feasible vibration (such as using concrete saws instead of jackhammers or hoe-rams to open excavation trenches, the use of non-vibratory rollers, and hand excavation); maintaining a buffer zone when possible between heavy equipment and historic resource(s); and enclosing construction scaffolding to avoid damage from falling objects or debris. These construction specifications shall be submitted to the Planning Department along with the Demolition and Site Permit Applications. To promote proper coordination of construction logistic activities intended to avoid damage to both adjacent and on-site historical resources, the methods proposed in M-CR-1c should be coordinated with those proposed in M-CR-4a, Protect Adjacent Historical Resources from Construction Activities. **Mitigation Measure M-CR-1d – Vibration Monitoring Program for On-Site Historical Resources.** The project sponsor shall retain the services of a qualified structural engineer and preservation architect that meet the Secretary of the Interior's Historic Preservation Professional Qualification Standards to conduct a Pre-Construction Assessment of the on-site historical resources (portion of the Lesser Brothers Building to be retained and Civic Center Hotel) prior to any ground-disturbing activity. The Pre-Construction Assessment shall be prepared to establish a baseline, and shall contain written and/or photographic descriptions of the existing condition of the visible exteriors of the adjacent buildings. The structural engineer and/or preservation architect shall also develop and the project sponsor shall adopt a Vibration Management and Monitoring Plan to protect the on-site historical resources against damage caused by vibration or differential settlement caused by vibration during project construction activities. In this plan, the maximum vibration level not to be exceeded at each building shall be determined by the structural engineer and/or preservation architect for the project. The Vibration Management and Monitoring Plan shall document the criteria	

TABLE S-1 SUMMARY OF IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THIS EIR

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
		used in establishing the maximum vibration level for the project. The Vibration Management and Monitoring Plan shall include vibration monitoring and regular periodic inspections at the project site by the structural engineer and/or historic preservation consultant throughout the duration of the major structural project activities to ensure that vibration levels do not exceed the established standard. The Pre-Construction Assessment and Vibration Management and Monitoring Plan shall be submitted to the Planning Department Preservation staff prior to issuance of any construction permits. Should damage to either of the on-site historical resources be observed, construction shall be halted and alternative techniques put in practice, to the extent feasible, and/or repairs shall be completed as part of project construction. A final report on the vibration monitoring of the portion of the Lesser Brothers Building to be retained shall be submitted to Planning Department Preservation staff prior to the issuance of a Certificate of Occupancy for the addition to that building, and a final report on the vibration monitoring of the Civic Center Hotel shall be submitted to Planning Department Preservation staff prior to the issuance of a Certificate of Occupancy for that building following its rehabilitation.	
Impact CR-2: The proposed project could cause a substantial adverse change in the significance of the Civic Center Hotel, a historical resource as defined in CEQA Guidelines Section 15064.5(b).	S	**Mitigation Measures M-CR-1c, Protect On-Site Historical Resources from Construction Activities**, and **M-CR-1d, Construction Monitoring Program for On-Site Historical Resources**, would apply.	LTS
Impact CR-3: The proposed project would not cause a substantial adverse change in the significance of the Path of Gold Light Standards, a historical resource as defined in CEQA Guidelines Section 15064.5(b).	LTS	No mitigation required.	NA

TABLE S-1 SUMMARY OF IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THIS EIR

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
Impact CR-4: Construction-related activities associated with the proposed project could cause a substantial adverse change in the significance of adjacent historical resources as defined in CEQA Guidelines Section 15064.5(b).	S	**Mitigation Measure M-CR-4a – Protect Adjacent Historical Resources from Construction Activities.** The project sponsor shall incorporate into construction contracts a requirement that the construction contractor(s) use feasible means to avoid damage to adjacent historical resources at 42 12th Street and 56–70 12th Street. Such methods may include staging of equipment and materials as far as feasible from historic buildings to direct damage; using techniques in demolition, excavation, shoring, and construction that create the minimum feasible vibration (such as using concrete saws instead of jackhammers or hoe-rams to open excavation trenches, the use of non-vibratory rollers, and hand excavation); maintaining a buffer zone when possible between heavy equipment and historic resource(s); and enclosing construction scaffolding to avoid damage from falling objects or debris. These construction specifications shall be submitted to the Planning Department along with the Demolition and Site Permit Applications. To promote proper coordination of construction logistic activities intended to avoid damage to both adjacent and on-site historical resources, the methods proposed in M-CR-4a should be coordinated with those proposed in M-CR-1c. **Mitigation Measure M-CR-4b – Vibration Monitoring Program for Adjacent Historical Resources.** The project sponsor shall retain the services of a qualified structural engineer and preservation architect that meet the Secretary of the Interior's Historic Preservation Professional Qualification Standards to conduct a Pre-Construction Assessment of the adjacent historical resources at 42 12th Street and 56–70 12th Street. Prior to any ground-disturbing activity, the Pre-Construction Assessment shall be prepared to establish a baseline, and shall contain written and/or photographic descriptions of the existing condition of the visible exteriors of the adjacent buildings and in interior locations upon permission of the owners of the adjacent properties. The Pre-Condition Assessment shall determine specific locations to be monitored, and include annotated drawings of the buildings to locate accessible digital photo locations and location of survey markers and/or other monitoring devices (e.g., to measure vibrations). The Pre-Construction Assessment shall be submitted to the Planning Department along with the Site Demolition and/or Permit Applications. The structural engineer and/or preservation architect shall develop and the project sponsor shall also adopt a Vibration Management and Monitoring Plan to protect the buildings at 42 12th Street and 56–70 12th Street against damage caused by vibration or differential settlement caused by vibration during project construction activities. In this plan, the maximum vibration level not to be exceeded at each building shall be 0.2 inch/second, or a different level determined by the site-specific assessment made by the structural engineer and/or preservation architect for the project. The Vibration Management and Monitoring Plan should document the criteria used in establishing	LTS

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Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
		the maximum vibration level for the project. The Vibration Management and Monitoring Plan shall include continuous vibration monitoring throughout the duration of the major structural project activities to ensure that vibration levels do not exceed the established standard. The Vibration Management and Monitoring Plan shall be submitted to the Planning Department Preservation staff prior to issuance of any construction permits. Should vibration levels be observed in excess of the standard, or if damage to either of the buildings at 42 12th Street and 56–70 12th Street is observed, construction shall be halted and alternative techniques put in practice, to the extent feasible. The structural engineer and/or historic preservation consultant shall conduct regular periodic inspections of digital photographs, survey markers, and/or other monitoring devices during ground-disturbing activity at project site. The buildings shall be protected to prevent further damage and remediated to pre-construction conditions as shown in the Pre-Construction Assessment with the consent of the building owner. Any remedial repairs shall not require building upgrades to comply with current *San Francisco Building Code* standards. A final report on the vibration monitoring shall be submitted to Planning Department Preservation staff prior to the issuance of a Certificate of Occupancy for Building D.	
Impact CR-5: The proposed project would not result in a substantial adverse change in the significance of an adjacent historical resource as defined in CEQA Guidelines Section 15064.5(b).	LTS	No mitigation required.	NA
Impact C-CR-1: The proposed project, in combination with past, present, and reasonably foreseeable projects in the area, would not result in a significant cumulative impact on historic architectural resources.	LTS	No mitigation required.	NA
Section IV.B, Transportation and Circulation			
Impact TR-1: The proposed project would not cause substantial additional VMT nor substantially induce automobile travel.	LTS	No mitigation required.	NA

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Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
Impact TR-2: The proposed project would not cause major traffic hazards.	LTS	No mitigation required. **Improvement Measure I-TR-2a – Monitoring and Abatement of Queues.** As an improvement measure to reduce the potential for queuing of vehicles accessing the project site, it should be the responsibility of the project sponsor to ensure that recurring vehicle queues or vehicle conflicts do not occur adjacent to the site. A vehicle queue is defined as one or more vehicles blocking any portion of adjacent sidewalks or travel lanes for a consecutive period of three minutes or longer on a daily and/or weekly basis. If recurring queuing occurs, the owner/operator of the facility should employ abatement methods as needed to abate the queue. Appropriate abatement methods would vary depending on the characteristics and causes of the recurring queue, as well as the characteristics of the parking and loading facility, the street(s) to which the facility connects, and the associated land uses (if applicable). Suggested abatement methods include, but are not limited to the following: redesign of facility to improve vehicle circulation and/or on-site queue capacity; employment of parking attendants; installation of LOT FULL signs with active management by parking attendants; use of valet parking or other space-efficient parking techniques; use of off-site parking facilities or shared parking with nearby uses; use of parking occupancy sensors and signage directing drivers to available spaces; travel demand management strategies as discussed in the **Transportation Demand Management (TDM) Program** in the project description; and/or parking demand management strategies such as parking time limits, paid parking, time-of-day parking surcharge, or validated parking. If the Planning Director, or his or her designee, determines that a recurring queue or conflict may be present, the Planning Department should notify the project sponsor, successor owner/operator or garage operator, as applicable, in writing. Upon request, the owner/operator should hire a qualified transportation consultant to evaluate the conditions at the site for no less than seven days. The consultant should prepare a monitoring report to be submitted to the Planning Department for review. If the Planning Department determines that a recurring queue or conflict does exist, the project sponsor should have 90 days from the date of the written determination to abate the recurring queue or conflict, to the satisfaction of the Planning Department. **Improvement Measure I-TR-2b – Notification at Driveway.** The Project Sponsor should provide visible/audible warning notification at the two driveway entrances to alert pedestrians to vehicles entering and exiting the driveway. Signage should be installed inside and outside the garage entrances, directing drivers to proceed with caution. Conditions at the driveways should be monitored during project occupancy to determine whether an additional audible warning signal(s) or detectible warning surfaces are necessary to supplement the visible warning signal. The final site design	NA

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Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
		will ensure the proposed project driveways are designed appropriately for the visually impaired.	
Impact TR-3: The proposed project would not result in a substantial increase in transit demand that could not be accommodated by adjacent local and regional transit capacity, or cause a substantial increase in delays or operating costs such that significant adverse impacts to local or regional transit service could occur.	LTS	No mitigation required.	NA
Impact TR-4: The proposed project would not result in substantial overcrowding on public sidewalks, and would not create potential hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas.	LTS	No mitigation required. **Improvement Measures I-TR-2a, Monitoring and Abatement of Queues**, and **I-TR-2b, Notification at Driveway**, would apply.	NA
Impact TR-5: The proposed project would not result in potentially hazardous conditions for bicyclists, or otherwise substantially interfere with bicycle accessibility to the site and adjoining areas.	LTS	No mitigation required.	NA
Impact TR-6: The proposed project would not result in a loading demand that could not be accommodated within the proposed on-site loading facilities or within convenient on-street loading zones, and would not create potentially hazardous conditions for traffic, transit, bicyclists, or pedestrians, or significant delays to transit.	LTS	No mitigation required. **Improvement Measure I-TR-6a – Consolidated Service Deliveries.** Building management should work with delivery providers (UPS, FedEx, DHL, USPS, etc.) to coordinate regular delivery times and appropriate loading locations for each building, and retail tenants should be required to schedule their deliveries. The Project Sponsor will evaluate the benefits of consolidating residential deliveries for the market-rate buildings by providing package storage in the buildings that front a loading zone as a potential way to discourage short-term parking on Market Street. Management should instruct all delivery services that trucks bound for the project site are not permitted to stop on Market Street, to encroach in the transit-only or bicycle lanes on Market Street, or to impede the movement of transit vehicles, other vehicles or bicycles by restricting access to the right-turn-only lane on Market Street at 12th Street. Delivery service providers should be strongly encouraged to comply with the project site's loading procedures. **Improvement Measure I-TR-6b – Managed Move-In/Move-Out Operations.** Building management should be responsible for coordinating and scheduling all move-in and move-out operations. To the extent possible, such operations requiring the use of on-street loading zones would occur during after-hours and on weekends. Tenants would be strongly encouraged to comply with building move-in/move-out operations.	NA

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Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
Impact TR-7: The proposed project would not result in significant impacts on emergency vehicle access.	LTS	No mitigation required.	NA
Impact TR-8: The proposed project construction activities would not result in substantial interference with transit, pedestrian, bicycle, or vehicle circulation and accessibility to adjoining areas, and would not result in potentially hazardous conditions.	LTS	No mitigation required.	NA
Impact C-TR-1: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not contribute to regional VMT in excess of expected levels.	LTS	No mitigation required.	NA
Impact C-TR-2: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not cause major traffic hazards.	LTS	No mitigation required.	NA
Impact C-TR-3: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in significant transit impacts.	LTS	No mitigation required.	NA
Impact C-TR-4: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in significant pedestrian impacts.	LTS	No mitigation required. **Improvement Measures I-TR-2a, Monitoring and Abatement of Queues**, and **I-TR-2b, Notification at Driveway**, would apply.	NA
Impact C-TR-5: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in cumulative bicycle impacts.	LTS	No mitigation required.	NA
Impact C-TR-6: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in significant impacts on loading.	LTS	No mitigation required.	NA
Impact C-TR-7: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a significant impact on emergency vehicle access.	LTS	No mitigation required.	NA

TABLE S-1 SUMMARY OF IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THIS EIR

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
Impact C-TR-8: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would contribute considerably to significant cumulative construction-related transportation impacts.	S	**Mitigation Measure M-C-TR-8a – Non-Peak Construction Traffic Hours.** To minimize the construction-related disruption of the general traffic flow on adjacent streets during the weekday AM and PM peak periods, truck movements and deliveries requiring lane closures should be limited to occur between 9:00 a.m. and 4:30 p.m. (Monday to Friday), outside of peak morning and evening weekday commute hours. **Mitigation Measure M-C-TR-8b – Construction Management Plan.** The project sponsor and/or its construction contractor shall propose a Construction Management Plan that includes measures to reduce potential conflicts between construction activities and pedestrians, transit and autos at the Project Site. The contractor shall supplement the standard elements of a construction traffic control/management plan with additional measures for Proposed Project construction, such as staggering start and end times, coordinated material drop offs, collective worker parking and transit to job site and other measures. Any such plan shall be reviewed by the TASC for consistency with the findings included herein and, where needed, additional measures may be imposed to minimize potentially significant construction traffic impacts. *Alternative Transportation for Construction Workers.* Limited parking would be available for construction workers in the future open space portion of the Project Site. The location of construction worker parking shall be identified as well as the person(s) responsible for monitoring the implementation of the proposed parking plan. The use of on-street parking to accommodate construction worker parking shall be discouraged. The project sponsor could provide additional on-site parking once the below grade parking garage is usable. To minimize parking demand and vehicle trips associated with construction workers, the construction contractor shall include in their contracts methods to encourage carpooling and transit access to the Project Site by construction workers. Construction workers should also be encouraged to consider cycling and walking as alternatives to driving alone to and from the Project Site. *Proposed Project Construction Updates for Adjacent Businesses and Residents.* To minimize construction impacts on access for nearby institutions and businesses, the Proposed Project Sponsor shall provide nearby residences and adjacent businesses, such as through a website, with regularly-updated information regarding Proposed Project construction, including a Proposed Project construction contact person, construction activities, duration, peak construction activities (e.g., concrete pours), travel lane closures, and lane closures. At regular intervals to be defined in the Construction Management Plan, an email notice shall be distributed by the project sponsor or its contractor(s) that shall provide current construction information of interest to neighbors, as well as contact information for specific construction inquiries or concerns.	SUM

TABLE S-1 SUMMARY OF IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THIS EIR

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
		Coordinate Construction with Nearby Projects. To minimize construction impacts, the Project Sponsor shall coordinate construction activities and closures with nearby projects, such as 10 South Van Ness, One Oak, Better Market Street, and 1500 Mission, as specified in Mitigation Measure M-C-TR-8c – Cumulative Construction Coordination. The Project Sponsor's Construction Management Plan, which would be required for each development, would include a section that summarizes the coordination efforts. *Maintain Local Circulation*. Comprehensive signage should be in place for all vehicle and pedestrian detours. If necessary, the Project Sponsor should provide a traffic control officer to direct traffic around the Project Site during detour periods. Pedestrian access should be preserved during construction detours as long as safe passage can be provided. **Mitigation Measure M-C-TR-8c – Cumulative Construction Coordination.** If construction of the proposed project is determined to overlap with nearby adjacent project(s) as to result in temporary construction-related transportation impacts, and in addition to preparing its own Construction Management Plan as required by Mitigation Measure M-C-TR-8b, the project sponsor or its contractor(s) shall consult with various City departments such as the SFMTA and Public Works through ISCOTT, and other interdepartmental meetings as deemed necessary by the SFMTA, Public Works, and the Planning Department. This coordination shall address construction-related vehicle routing, detours, and maintaining transit, bicycle, vehicle, and pedestrian movements in the vicinity of the construction area for the duration of the construction period overlap. Key coordination meetings would be held jointly between project sponsors and contractors of other projects for which the City departments determine impacts could overlap. The coordination shall consider other ongoing construction in the project vicinity, including development and transportation infrastructure projects, and topics of coordination shall include, but not be limited to, the following: • *Restricted Construction Truck Access Hours*— Coordinate limitations on truck movements requiring lane closures to the hours between 9:00 a.m. and 4:30 p.m. (Monday-Friday), or other times if approved by the SFMTA, to minimize disruption to vehicular traffic, including transit, during the AM and PM peak periods. • *Construction Truck Routing Plans*—Identify optimal truck routes between the regional facilities and the various project sites, taking into consideration truck routes of other development projects and any construction activities affecting the roadway network. • *Coordination of Temporary Lane and Sidewalk Closures*—Coordinate lane closures with other projects requesting concurrent lane and sidewalk closures through the	

TABLE S-1 SUMMARY OF IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THIS EIR

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
		ISCOTT and interdepartmental meetings process above, to minimize the extent and duration of requested lane and sidewalk closures. Travel lane closures shall be minimized especially along transit and bicycle routes, so as to limit the impacts to transit service and bicycle circulation and safety. • *Maintenance of Transit, Vehicle, Bicycle, and Pedestrian Access*—The project sponsor/construction contractor(s) shall meet with Public Works, SFMTA, the Fire Department, Muni Operations and other City agencies to coordinate feasible measures to include in the Construction Management Plan required by Mitigation Measure M-C-TR-8b to maintain access for transit, vehicles, bicycles and pedestrians. This shall include an assessment of the need for temporary transit stop relocations or other measures to reduce potential traffic, bicycle, and transit disruption and pedestrian circulation effects during construction of the project. • *Carpool, Bicycle, Walk and Transit Access for Construction Workers*—Coordinate efforts and methods to encourage carpooling, bicycling, walk and transit access to the various project sites by construction workers (such as providing secure bicycle parking spaces, participating in free-to-employee and employer ride matching program from www.511.org, participating in emergency ride home program through the City of San Francisco (www.sferh.org), and providing transit information to construction workers). • *Coordinated Project Construction Updates for Adjacent Businesses and Residents*—Coordinate to the extent appropriate, notifications to nearby residences and adjacent businesses with regularly-updated information regarding project construction, including construction activities, peak construction vehicle activities (e.g., concrete pours), travel lane closures, and lane closures.	

IMPACT CODES:

NA Not Applicable	S Significant
NI No impact	SU Significant and unavoidable adverse impact, no feasible mitigation
LTS Less than significant	SUM Significant and unavoidable adverse impact, after mitigation

TABLE S-2 SUMMARY OF SIGNIFICANT IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THE INITIAL STUDY (APPENDIX A)

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
Cultural Resources (Historical Architectural Resources Only)			
Impact CR-6: The proposed project could cause a substantial adverse change in the significance of an archeological resource.	S	**Mitigation Measure M-CR-6 – Archeological Testing.** Based on a reasonable presumption that archeological resources may be present within the project area, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of an archeological consultant from the rotational Department Qualified Archeological Consultants List (QACL) maintained by the Planning Department archeologist. The project sponsor shall contact the Department archeologist to obtain the names and contact information for the next three archeological consultants on the QACL. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Section 15064.5(a) and (c). *Consultation with Descendant Communities.* On discovery of an archeological site[4] associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group, an appropriate representative[5] of the descendant group and the ERO shall be contacted. The representative of the descendant group, shall be given the opportunity to monitor archeological field investigations of the site and to offer recommendations to the ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Final Archeological Resources Report shall be provided to the representative of the descendant group. *Archeological Testing Program.* The archeological consultant shall prepare and submit to the ERO for review and approval an archeological testing plan (ATP). The archeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, the testing method to be used, and the locations recommended for testing. The purpose of the archeological testing program will be to determine to the extent	LTS

[4] The term "archeological site" is intended here to minimally include any archeological deposit, feature, burial, or evidence of burial.

[5] An "appropriate representative" of the descendant group is here defined to mean, in the case of Native Americans, any individual listed in the current Native American Contact List for the City and County of San Francisco maintained by the California Native American Heritage Commission and in the case of the Overseas Chinese, the Chinese Historical Society of America. An appropriate representative of other descendant groups should be determined in consultation with the Department archeologist.

TABLE S-2 SUMMARY OF SIGNIFICANT IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THE INITIAL STUDY (APPENDIX A)

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
		possible the presence or absence of archeological resources and to identify and to evaluate whether any archeological resource encountered on the site constitutes an historical resource under CEQA. At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the ERO. If based on the archeological testing program the archeological consultant finds that significant archeological resources may be present, the ERO in consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or an archeological data recovery program. No archeological data recovery shall be undertaken without the prior approval of the ERO or the Planning Department archeologist. If the ERO determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either: A. The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or B. A data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible. *Archeological Monitoring Program.* If the ERO in consultation with the archeological consultant determines that an archeological monitoring program shall be implemented, the archeological monitoring program shall minimally include the following provisions: ● The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils- disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, site remediation, etc., shall require archeological monitoring because of the risk these activities pose to potential archeological resources and to their depositional context; ● The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource; ● The archeological monitor(s) shall be present on the project area according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits; ● The archeological monitor shall record and be authorized to collect soil samples and artefactual/ecofactual material as warranted for analysis; ● If an intact archeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/construction activities and equipment until the deposit is evaluated. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological	

TABLE S-2 SUMMARY OF SIGNIFICANT IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THE INITIAL STUDY (APPENDIX A)

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
		consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO. Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO. *Archeological Data Recovery Program.* If required based on the results of the ATP, an archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical. If required, the scope of the ADRP shall include the following elements: • *Field Methods and Procedures*—Descriptions of proposed field strategies, procedures, and operations. • *Cataloguing and Laboratory Analysis*—Description of selected cataloguing system and artifact analysis procedures. • *Discard and Deaccession Policy*—Description of and rationale for field and post-field discard and deaccession policies. • *Interpretive Program*—Consideration of an on-site/off-site public interpretive program during the course of the archeological data recovery program. • *Security Measures*—Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities. • *Final Report*—Description of proposed report format and distribution of results. • *Curation*—Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities. *Final Archeological Resources Report.* The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report. Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal	

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Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
		of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound, one unbound and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.	
Impact CR-7: The proposed project could disturb human remains, including those interred outside of dedicated cemeteries.	S	**Mitigation Measure M-CR-7 – Inadvertent Discovery of Human Remains.** The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and the ERO, 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) (PRC Section 5097.98). The archeological consultant, project sponsor, ERO, and MLD shall have up to but not beyond six days of discovery to make all reasonable efforts to develop an agreement for the treatment of human remains and associated or unassociated funerary objects with appropriate dignity (CEQA Guidelines Section 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. Nothing in existing State regulations or in this mitigation measure compels the project sponsor and the ERO to accept recommendations of an MLD. The archeological consultant shall retain possession of any Native American human remains and associated or unassociated burial objects until completion of any scientific analyses of the human remains or objects as specified in the treatment agreement if such as agreement has been made or, otherwise, as determined by the archeological consultant and the ERO.	LTS
Impact CR-8: The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074.	S	**Mitigation Measure M-CR-8 – Tribal Cultural Resources Interpretive Program.** If the ERO determines that a significant archeological resource is present, and if in consultation with the affiliated Native American tribal representatives, the ERO determines that the resource constitutes a tribal cultural resource (TCR) and that the resource could be adversely affected by the proposed project, the proposed project shall be redesigned so as to avoid any adverse effect on the significant tribal cultural resource, if feasible. If the Environmental Review Officer (ERO), in consultation with the affiliated Native American tribal representatives and the Project Sponsor, determines that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option, the Project Sponsor shall implement an interpretive program of the TCR in consultation with affiliated tribal representatives. An interpretive plan produced in consultation with the ERO and affiliated tribal representatives, at a minimum, and approved by the ERO would be required to guide the interpretive program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, artifacts displays and interpretation, and educational panels or other informational displays.	LTS

TABLE S-2 SUMMARY OF SIGNIFICANT IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THE INITIAL STUDY (APPENDIX A)

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
Impact C-CR-2: The proposed project in combination with past, present, and reasonably foreseeable future projects in the vicinity could result in cumulative impacts to archeological resources, tribal cultural resources, and human remains.	S	**Mitigation Measures M-CR-6 – Archeological Testing; M-CR-7, Inadvertent Discovery of Human Remains;** and **M-CR-8, Tribal Cultural Resources Interpretive Program**, would apply.	LTS
Noise			
Impact NO-1: The proposed project could result in the exposure of persons to or generation of noise levels in excess of established standards, and could result in a substantial permanent increase in ambient noise levels or otherwise be substantially affected by existing noise.	S	**Mitigation Measure M-NO-1 – Acoustical Assessment of Mechanical, Electrical, and Plumbing (MEP) Equipment.** Prior to issuance of the Architectural and MEP Addendum, the project sponsor shall submit an Acoustical Assessment that analyzes the potential noise impact to adjacent receptors from mechanical equipment and identifies acoustical treatments such as enclosures, acoustical louvers or baffling, as necessary, to achieve a 45 dB interior performance standard resulting from noise generated by mechanical, electrical, and plumbing equipment systems when locations and specifications of such systems are identified in the engineering plans.	LTS

TABLE S-2 SUMMARY OF SIGNIFICANT IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THE INITIAL STUDY (APPENDIX A)

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
Impact NO-2: During construction, the proposed project could result in a substantial temporary or periodic increase in ambient noise levels and vibration in the project vicinity above levels existing without the proposed project.	S	**Mitigation Measure M-NO-2 – Construction Noise Reduction.** Incorporate the following practices into the construction contract agreement documents to be implemented by the construction contractor: • Conduct noise monitoring at the beginning of major construction phases (e.g., demolition, excavation) to determine the need and the effectiveness of noise-attenuation measures. Measures needed to reduce activity that exceeds 86 dB at a distance of 50 feet or 73 dBA L_{eq} at the property line shall include plywood barriers, suspended construction blankets, or other screening devices to break line of sight to noise-sensitive receivers; • 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; • Notify the City and neighbors in advance of the schedule for each major phase of construction and expected loud activities; • Construction activity shall be limited to the hours of 7:00 a.m. to 8:00 p.m. per San Francisco Police Code Article 29. Construction outside of these hours shall be approved through a development permit based on a site-specific construction noise mitigation plan and a finding by the Director of Building Inspection that the construction noise mitigation plan is adequate to prevent noise disturbance of affected residential uses; • When feasible, select "quiet" construction methods and equipment (e.g., improved mufflers, use of intake silencers, engine enclosures); • Locate stationary equipment, material stockpiles, and vehicle staging areas as far as practicable from all identified sensitive receptors. Avoid placing stationary noise generating equipment (e.g., generators, compressors) within noise-sensitive buffer areas (measured at 20 feet) from immediately adjacent neighbors; • All construction equipment is required to be in good working order and mufflers are required to be inspected proper functionality; • Prohibit unnecessary idling of equipment and engines; • During Phase 2 of construction, stationary equipment should be located internal to the project to the extent feasible to allow for the shielding provided by the Phase 1 buildings; • Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used where feasible; this could achieve a reduction of five dBA. Quieter procedures, such as use of drills rather than impact tools, shall be used where feasible; and • The project sponsor shall designate a point of contact to respond to noise complaints. The point of contact must have the authority to modify construction noise-generating activities to ensure compliance with the measures above and with the San Francisco Noise Ordinance.	LTS

TABLE S-2 SUMMARY OF SIGNIFICANT IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THE INITIAL STUDY (APPENDIX A)

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
Impact C-NO-1: The proposed project would make a considerable contribution to cumulative significant noise impacts.	S	**Mitigation Measures M-NO-1, Acoustical Assessment of Mechanical, Electrical, and Plumbing Equipment**, and **M-NO-2, Construction Noise Reduction**, would apply.	LTS
Air Quality			
Impact AQ-3: The proposed project would generate toxic air contaminants, including diesel particulate matter, exposing sensitive receptors to substantial air pollutant concentrations.	S	**Mitigation Measure M-AQ-3 – Construction Air Quality.** The project sponsor or the project sponsor's Contractor shall comply with the following: A. *Engine Requirements.* 1. Electric construction equipment used during the Phase 1 construction period shall include air compressors, concrete/industrial saws, signal boards, pumps, cement and mortar mixers, and stationary cranes. Electric construction equipment used during the Phase 2 construction period shall include air compressors, concrete/industrial saws, signal boards, pumps, cement and mortar mixers, and stationary cranes. 2. 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. 3. Where access to alternative sources of power is reasonably available, portable diesel engines shall be prohibited. 4. 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. 5. The Contractor shall require that construction workers and equipment 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), and that no air quality significance threshold used in this Initial Study would be exceeded.	LTS

TABLE S-2 SUMMARY OF SIGNIFICANT IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THE INITIAL STUDY (APPENDIX A)

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation

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 or not commercially available; 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 seeking a waiver, the Contractor must use the next cleanest piece of off-road equipment, according to Table M-AQ-3a-3, and submit documentation showing that no air quality significance threshold used in this Initial Study would be exceeded. No waivers shall be granted if an air quality significance threshold would be exceeded by doing so.

TABLE M-AQ-3A-3 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.

TABLE S-2 SUMMARY OF SIGNIFICANT IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THE INITIAL STUDY (APPENDIX A)

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
		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. Within six months of completion of construction activity, 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.	
Impact C-AQ-1: The proposed project, in combination with past, present, and reasonably foreseeable future development in the project area would contribute to cumulative air quality impacts.	S	**Mitigation Measure M-AQ-3, Construction Air Quality**, would apply.	LTS
Geology and Soils			
Impact GE-3: The proposed project would be located on a 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.	S	**Mitigation Measure M-GE-3a – Design Approval and Construction Monitoring for BART Subway Structure.** Prior to issuance of the structural plan addendum to the site permit for the proposed project by DBI, the project sponsor shall submit such plans to BART for its review and approval to ensure that the plans comply with BART guidelines for the construction activity in the BART Zone of Influence (ZOI), including the *General Guidelines for Design and Construction Over or Adjacent to BART's Subway Structures*, and *Procedures for Permit and Plan Review*. The project sponsor and its structural engineer shall coordinate with BART to determine which of the following guidelines must be included in the plans to be submitted to BART for review: • Geologic Hazards Evaluation and Geotechnical Investigation reports, which shall include an engineering geology map, a site plan showing the location of subway structures and BART easement, a soil reworking plan, and the geological conclusion and recommendations; • Dewatering monitoring and recharging plans; • A vibration monitoring plan and/or movement and deformation monitoring plans for steel lined tunnels, including locations and details of instruments in subways;	LTS

TABLE S-2 SUMMARY OF SIGNIFICANT IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THE INITIAL STUDY (APPENDIX A)

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
		• A foundation plan showing the anticipated total foundation loads; • An excavation plan for area in the ZOI, showing excavation slope or shoring system; and • A description of the procedures and control of the soil compaction operation. The project sponsor and its consultant shall monitor the groundwater level in the BART ZOI, and piezometers shall be installed on the sidewalk adjacent to the site if requested by BART. **Mitigation Measure M-GE-3b – Monitoring of Adjacent Structures in the Event of Dewatering.** If recommended by the final geotechnical report, the project sponsor would retain a qualified professional to monitor potential settlement and subsidence at permanent structures within 50 feet of the project site. The monitoring shall include, but not be limited to, the following tasks prior to dewatering: • Establish survey measurements of the exterior elevations of adjacent properties to monitor any movement or settlement of adjacent permanent structures during excavation; • Photograph and/or video the exterior the relevant structures to document existing conditions prior to commencement of dewatering. The photographic and/or video survey shall be adequate in scope to provide a legally binding "before and after" comparison of the conditions of the adjacent permanent structures; and • Install inclinometers and piezometers if necessary to monitor movement of the shoring system and to monitor groundwater levels, respectively, during excavation and construction. Upon start of construction, the qualified professional shall perform the following tasks: • Monitor the relevant structures weekly until dewatering and foundation construction and sealing work has been completed; and • In the event that there is more than one-half inch of lateral movement, or one-quarter inch of vertical movement, at an adjacent permanent structure within 50 feet of the project site, the qualified individual shall immediately notify the adjacent property owner, the project sponsor's general contractor, the shoring and excavation subcontractor, and DBI, and the project sponsor shall instruct its contractor and subcontractor to stop work until such time that appropriate remedial steps have been completed.	

TABLE S-2 SUMMARY OF SIGNIFICANT IMPACTS OF THE PROPOSED PROJECT—DISCLOSED IN THE INITIAL STUDY (APPENDIX A)

Environmental Impact	Level of Significance prior to Mitigation	Improvement/Mitigation Measures	Level of Significance after Mitigation
Impact GE-6: The proposed project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	S	**Mitigation Measure M-GE-6 – Inadvertent Discovery of Paleontological Resources.** If potential vertebrate fossils are discovered by construction crews, all earthwork or other types of ground disturbance within 50 feet of the find shall stop immediately and the monitor shall notify the City. The fossil should be protected by an "exclusion zone" (an area approximately five feet around the discovery that is marked with caution tape to prevent damage to the fossil). Work shall not resume until a qualified professional paleontologist can assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the qualified paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the fossil. The qualified paleontologist may also propose modifications to the stop-work radius based on the nature of the find, site geology, and the activities occurring on the site. If treatment and salvage is required, recommendations shall be consistent with SVP's 2010 Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, and currently accepted scientific practice, and shall be subject to review and approval by the City. If required, treatment for fossil remains may include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection [e.g., the University of California Museum of Paleontology], and may also include preparation of a report for publication describing the finds. The City shall ensure that information on the nature, location, and depth of all finds is readily available to the scientific community through university curation or other appropriate means.	LTS

IMPACT CODES:

NA Not Applicable
NI No impact
LTS Less than significant
S Significant
SU Significant and unavoidable adverse impact, no feasible mitigation
SUM Significant and unavoidable adverse impact, after mitigation

Summary of Project Alternatives

This EIR provides three project alternatives to the proposed project as summarized below and further detailed in Chapter VI, *Alternatives*:

- **No Project Alternative:** Under the No Project Alternative, the existing buildings and parking lots would remain unchanged on the project site.
- **Partial Preservation Alternative:** Under the Partial Preservation Alternative, a majority of the Lesser Brothers Building would be retained, including the north (Market Street), east, and west (Brady Street) façades, as well as a majority of the interior space.
- **Full Preservation Alternative:** Under the Full Preservation Alternative, the Lesser Brothers Building would be retained in its entirety.

Table S-3, Comparison of the Significant Environmental Impacts of Project to Impacts of Alternatives, presents the significant impacts of the proposed project and summarizes the environmental impacts of the selected alternatives compared to those of the proposed project.

Environmentally Superior Alternative

The California Environmental Quality Act (CEQA) Guidelines require the identification of an environmentally superior alternative (Section 15126.6(e)). The environmentally superior alternative is the alternative that best avoids or lessens any significant effects of the proposed project, even if the alternative would impede to some degree the attainment of the project objectives. If it is determined that the "no project" alternative would be the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other project alternatives (Section 15126.6(3)).

The proposed project would result in a significant and unavoidable impact related to historic architectural resources, in that the proposed project would demolish most of the historic Lesser Brothers Building, thereby resulting in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(b). No other project-specific significant and unavoidable impacts would occur as a result of the proposed project, although the proposed project would make a considerable contribution to the significant and unavoidable cumulative construction-related transportation impact due to potentially overlapping construction schedules of the proposed project and other nearby projects. However, this cumulative impact is largely a function of the many other projects proposed and recently approved in the vicinity of the intersection of Market Street and Van Ness Avenue, and would occur regardless of whether the proposed project were to proceed. The No Project Alternative would be the environmentally superior alternative because the significant project-specific impact associated with implementation of the proposed project would not occur. The No Project Alternative, which would involve no new development on the project site, would also eliminate the project's less-than-significant impacts, and no mitigation measures would be required.

Because CEQA requires selection of an environmentally superior alternative other than the No Project Alternative, the Full Preservation Alternative is identified as the environmentally superior alternative because it would meet most of the project sponsor's basic objectives, albeit to a lesser degree in some instances, while avoiding the proposed project's significant and unavoidable historical architectural resources impact on the

Lesser Brothers Building. While the Full Preservation Alternative would not avoid the proposed project's considerable contribution to a significant and unavoidable cumulative construction-related transportation impact, and would incrementally increase vehicle trips and resultant emissions and noise from vehicle traffic, it would not result in any new significant impacts or substantially more severe impacts as compared to the proposed project. Inasmuch as the Full Preservation Alternative would avoid the proposed project's only project-specific significant and unavoidable impact, and because the cumulative construction-related transportation impact cannot feasibly be avoided due the to the potential lengthy project delays that could result from imposing sequential (i.e., non-overlapping) construction schedules for all projects in the vicinity of the project site, the Full Preservation Alternative is considered the environmentally superior alternative.

Areas of Controversy and Issues to Be Resolved

During the Notice of Preparation of an EIR (NOP) review and comment period, a total of five letters, emails, and comment cards were submitted to the Planning Department and seven speakers provided oral comments at the public scoping meeting. Topics raised in the comment letters relate to Land Use and Land Use Planning; Population and Housing; Cultural Resources; Transportation and Circulation; Noise; Air Quality; Wind and Shadow; Public Services; Biological Resources; Geology; and Hydrology and Water Quality. Section V.E, *Areas of Known Controversy and Issues to Be Resolved*, in Chapter V, *Other CEQA Considerations*, of this EIR provides a summary of the comments received during the NOP scoping period and notes where each of these issues is specifically addressed in this document, or provides a response to the comment received.

TABLE S-3 COMPARISON OF THE SIGNIFICANT ENVIRONMENTAL IMPACTS OF PROJECT TO IMPACTS OF ALTERNATIVES

Impacts	Proposed Project	Alternative A: No Project Alternative	Alternative B: Full Preservation Alternative	Alternative C: Partial Preservation Alternative
Description	The proposed project would demolish the existing UA Local 38 building, demolish the majority of the Lesser Brothers Building, rehabilitate the Civic Center Hotel, and demolish the 242-space surface parking lots on the project site. The proposed development would construct a total of five new buildings on the project site. Overall, the proposed project would include construction of 498,100 square feet of residential use that would contain a total of up to 584 dwelling units consisting of 477 residential units and up to 107 affordable units in the Colton Street Affordable Housing building. In addition, the proposed project would include 27,300 square feet of union facility use, 13,000 square feet of ground-floor retail/restaurant use, and 32,800 square feet of publicly-accessible and residential common open space.	The site would remain in its existing condition. The buildings and parking lots on the project site would not be altered, and the proposed new residential and retail/restaurant uses would not be developed.	This alternative would develop the project site in the same manner as the proposed project, but would retain the entirety of the Lesser Brothers Building, add a partial, approximately nine-foot-tall single-story addition atop this building, and construct a smaller new residential building (Building A) behind (south of) the historic Lesser Brothers Building, approximately 60 feet south of Market Street. This alternative would provide 520 dwelling units, including up to 107 dwelling units in the Colton Street Affordable Housing building. This alternative would include 27,300 square feet of union facility use, 20,300 square feet of retail/restaurant space, between 296 and 301 parking spaces, 215 Class 1 and 39 Class 2 bicycle parking spaces, and 32,800 square feet of publicly-accessible and residential common open space.	This alternative would develop the project site in the same manner as the proposed project, but would construct a smaller new residential building (Building A) set back 30 feet from the Market Street façade of the Lesser Brothers Building, and retain approximately 55 percent of the volume of the Lesser Brothers Building, including the Market Street façade. This alternative would provide 549 dwelling units, including up to 107 dwelling units in the Colton Street Affordable Housing building. This alternative would include 27,300 square feet of union facility use, 14,400 square feet of retail/restaurant space, between 296 and 301 parking spaces, 222 Class 1 and 41 Class 2 bicycle parking spaces, and 32,800 square feet of publicly-accessible and residential common open space.
Ability to Meet Project Sponsor's Objectives	All	None	Most	Most
Cultural Resources				
Effects on Lesser Brothers Building	**Impact CR-1:** The proposed project would cause a substantial adverse change in the significance of the Lesser Brothers Building, a historical resource as defined in CEQA Guidelines Section 15064.5(b). (SUM)	No impact (NI)	Less substantial than the proposed project (LTS)	Somewhat less substantial than the proposed project (SUM)
Effects on Civic Center Hotel	**Impact CR-2:** The proposed project could cause a substantial adverse change in the significance of the Civic Center Hotel, a historical resource as defined in CEQA Guidelines Section 15064.5(b). (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)

TABLE S-3 COMPARISON OF THE SIGNIFICANT ENVIRONMENTAL IMPACTS OF PROJECT TO IMPACTS OF ALTERNATIVES

Impacts	Proposed Project	Alternative A: No Project Alternative	Alternative B: Full Preservation Alternative	Alternative C: Partial Preservation Alternative
Effects on Adjacent Resources	**Impact CR-4:** Construction-related activities associated with the proposed project could cause a substantial adverse change in the significance of adjacent historical resources as defined in CEQA Guidelines Section 15064.5(b). (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)
Effects on Archeological Resources	**Impact CR-6:** The proposed project could cause a substantial adverse change in the significance of an archeological resource. (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)
Effects on Human Remains	**Impact CR-7:** The proposed project could disturb human remains, including those interred outside of dedicated cemeteries. (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)
Effects on Tribal Cultural Resources	**Impact CR-8:** The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074. (LAM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)
Cumulative Cultural Resources Effects	**Impact C-CR-2:** The proposed project in combination with past, present, and reasonably foreseeable future projects in the vicinity could result in cumulative impacts to archeological resources, tribal cultural resources, and human remains. (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)
Transportation and Circulation				
Cumulative Construction Impacts	**Impact C-TR-8:** The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would contribute considerably to significant cumulative construction-related transportation impacts. (SUM)	No impact (NI)	Similar to the proposed project (SUM)	Similar to the proposed project (SUM)

TABLE S-3 COMPARISON OF THE SIGNIFICANT ENVIRONMENTAL IMPACTS OF PROJECT TO IMPACTS OF ALTERNATIVES

Impacts	Proposed Project	Alternative A: No Project Alternative	Alternative B: Full Preservation Alternative	Alternative C: Partial Preservation Alternative
Noise				
Operational Noise Effects	**Impact NO-1:** The proposed project could result in the exposure of persons to or generation of noise levels in excess of established standards, and could result in a substantial permanent increase in ambient noise levels or otherwise be substantially affected by existing noise. (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)
Construction Noise Effects	**Impact NO-2:** During construction, the proposed project could result in a substantial temporary or periodic increase in ambient noise levels and vibration in the project vicinity above levels existing without the proposed project. (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)
Cumulative Noise Effects	**Impact C-NO-1:** The proposed project would make a considerable contribution to cumulative significant noise impacts. (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)
Air Quality				
Exposure to Toxic Air Contaminants	**Impact AQ-3:** The proposed project would generate toxic air contaminants, including diesel particulate matter, exposing sensitive receptors to substantial air pollutant concentrations. (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)
Cumulative Air Quality Effects	**Impact C-AQ-1:** The proposed project, in combination with past, present, and reasonably foreseeable future development in the project area would contribute to cumulative air quality impacts. (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)

TABLE S-3 COMPARISON OF THE SIGNIFICANT ENVIRONMENTAL IMPACTS OF PROJECT TO IMPACTS OF ALTERNATIVES

Impacts	Proposed Project	Alternative A: No Project Alternative	Alternative B: Full Preservation Alternative	Alternative C: Partial Preservation Alternative
Geology and Soils				
Effects on BART Tunnels	**Impact GE-3:** The proposed project would be located on a 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. (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)
Effects on Paleontological Resources	**Impact GE-6:** The proposed project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)

IMPACT CODES:

NI = No impact

LTS = Less than significant or negligible impact; no mitigation required

LSM = Less than significant impact with implementation of mitigation measure(s)

SU = Significant and unavoidable adverse impact, no feasible mitigation

SUM = Significant and unavoidable adverse impact, after mitigation

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CHAPTER I
Introduction

I.A Project Summary

This Environmental Impact Report (EIR) analyzes potential environmental effects associated with the 1629 Market Street Mixed-Use project (proposed project). The project sponsor, Strada Brady, LLC, proposes to demolish the existing UA Local 38 building, demolish the majority of the Lesser Brothers Building, and rehabilitate the Civic Center Hotel, as well as demolish the 242-space surface parking lots on the project site. The proposed project would construct a total of five new buildings on the project site, including a new UA Local 38 building, and a 10-story addition to the Lesser Brothers Building with ground-floor retail/restaurant space at the corner of Brady and Market Streets ("Building A"). A new 10-story residential building with ground-floor retail/restaurant space ("Building B") would be constructed on Market Street between the new UA Local 38 building and Building A. A nine-story residential building would be constructed at the end of Colton Street and south of Stevenson Street ("Building D"). The five-story Civic Center Hotel (also referred to as "Building C"), would be rehabilitated to contain residential units and ground-floor retail/restaurant, and a new six-story Colton Street Affordable Housing building would be constructed south of Colton Street as part of the proposed project. Overall, the proposed project would include construction of 498,100 square feet of residential use that would contain up to 477 residential units and up to 107 affordable units in the Colton Street Affordable Housing building, for a total of up to 584 units.[6] In addition, the proposed project would include 27,300 square feet of union facility use, 13,000 square feet of ground-floor retail/restaurant use, and 32,800 square feet of publicly-accessible and residential open space.

The approximately 97,617-square-foot (2.2-acre) project site is on the block bounded by Market, 12th, Otis, and Brady Streets within the boundaries of San Francisco's Market & Octavia Plan Area Plan, an area plan of the *San Francisco General Plan* (*General Plan*). The project sponsor would seek amendments to the Zoning Map Height and Bulk Districts and *San Francisco Planning Code* (*Planning Code*) text amendments to create a new special use district and amendments to the Market & Octavia Area Plan land use and height maps and open space policy language. In addition, the project sponsor is seeking approval of a Conditional Use/Planned Unit Development for lot and use size and to allow certain *Planning Code* exceptions. The project sponsor would also seek approval of a Development Agreement with respect to the project sponsor's commitment to develop affordable housing as part of the proposed project and to develop and maintain the Brady Open Space. Further details regarding the proposed project are discussed in depth in Chapter II, *Project Description*.

[6] The proposed project would meet the requirements of the City's Residential Inclusionary Affordable Housing Program (*Planning Code* Sections 415 et seq.) by providing market rate and affordable units within the 477 residential units, as well as up to 107 affordable units in the Colton Street Affordable Housing building, as set forth in the Development Agreement.

I.B Purpose of This EIR

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

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

As defined in CEQA Guidelines Section 15382, a "significant effect on the environment" is:

> … a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

CEQA requires that before a discretionary decision can be made to approve a project that may cause a significant effect on the environment that cannot be mitigated, an EIR must be prepared. The EIR is a public information document for use by governmental agencies and the public to identify and evaluate potential environmental impacts of a project, to identify mitigation measures to lessen or eliminate significant adverse impacts, and to examine feasible alternatives to the project. The City must consider the information in this EIR and make certain findings with respect to each significant effect that is identified. The information contained in this EIR, along with other information available through the public review processes, will be reviewed and considered by the decision-makers prior to a decision to approve, disapprove, or modify the proposed project, or to adopt an alternative to the proposed project.

I.C Type of EIR

This document is a project-level EIR pursuant to the CEQA Guidelines Section 15161. A project-level EIR focuses on the changes in the environment that would result from construction and operation of a specific development project.

Furthermore, this EIR is also a focused EIR, in accordance with CEQA Guidelines Section 15063(c). In accordance with Section 15128, an Initial Study on the proposed project was prepared (refer to Appendix A of this EIR), to identify which of the proposed project's effects would result in less-than-significant impacts and do not require further analysis, and which topics warrant more detailed environmental analysis in the EIR. The Initial Study has not gone through a separate public review process; however, comments will be accepted on the Initial Study

during the public review period for the EIR.[7] Thus, this EIR focuses the environmental analysis on those topics identified in the Initial Study with the potential to have significant impacts.

This EIR evaluates the whole of the proposed action, including project-level impacts (off-site, on-site, construction-related, operational, direct, and indirect) and cumulative impacts. This EIR is an informational document that does not determine whether a project will be approved, but aids in the planning and decision-making process by disclosing the potential environmental impacts associated with construction and operation of the proposed project.

An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information that enables them to make a decision that takes account of environmental consequences. An evaluation of the environmental impacts of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure (CEQA Guidelines Section 15151).

I.D CEQA Environmental Review Process

I.D.1 Notice of Preparation of an Environmental Impact Report

Strada Brady, LLC filed an Environmental Evaluation application with the Planning Department on July 10, 2015. The filing of the Environmental Evaluation application initiated the environmental review process. The EIR process provides an opportunity for the public to review and comment on the proposed project's potential environmental effects and to further inform the environmental analysis.

On February 8, 2017, the Planning Department published a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) and a Notice of Public Scoping Meeting for the proposed project. The NOP was distributed for a 30-day review period to responsible or trustee agencies with CEQA Guidelines Section 15082, and to other organizations, companies, and/or individuals that the City believed have an interest in the proposed project. The NOP requested that agencies and interested parties comment on environmental issues that should be addressed in the EIR. The purpose of the public review period was to solicit comments on the scope and content of the environmental analysis contained in the EIR. In addition, to solicit further comments on the scope and content of the environmental analysis to be included in the EIR, the Planning Department held a public scoping meeting on March 1, 2017, at the American Red Cross building at 1663 Market Street, San Francisco.

I.D.2 Areas of Known Controversy and Issues to Be Resolved

During the NOP review and comment period, a total of five comment letters, comment cards, and emails were submitted to the Planning Department and seven speakers provided oral comments at the public scoping session. Topics raised in the written and oral comments include potential construction-related noise, air quality,

[7] Pursuant to CEQA Guidelines Section 15128, the EIR shall contain a brief statement indicating the reasons why various possible significant effects were determined not to be significant and were not discussed in the EIR.

and vehicle circulation impacts; potential loading impacts; parking-related impacts; potential noise impacts from the proposed project in tandem with cumulative development; other transportation-related impacts with regard to emergency vehicle access and pedestrian safety during construction; potential shadow impacts on parks; potential wind impacts; and potential flooding during rain events.

The comment letters, emails, and comment cards received in response to the NOP, as well as a transcript of the oral comments received at the March 1, 2017, public scoping meeting, can be found in Appendix B and are available for review as part of Case File No. 2015-005848ENV. The Planning Department has considered the comments made by the public in preparation of the EIR for the proposed project. Comments on the NOP that relate to environmental issues are addressed and analyzed throughout this EIR and Initial Study.

Comments expressing support for, or opposition to, the proposed project will be considered independently of the environmental review process by City decision-makers as part of their decision to approve, modify, or disapprove the proposed project.

As noted in the *Summary* of this EIR, the proposed project is subject to CEQA Statute 21099(d), which eliminates consideration of impacts related to the topics of aesthetics and parking in determining the significance of physical environmental impacts under CEQA for residential, mixed-use residential, or employment center projects on infill sites within transit priority areas. Accordingly, this EIR does not contain a separate discussion of impacts related to the topic of aesthetics. The EIR nonetheless provides an overview of the existing and proposed visual character of the site and surroundings for informational purposes as part of Chapter II, *Project Description*. Furthermore, this EIR discusses parking in Section IV.B, *Transportation and Circulation*, for informational purposes only. Overall, the information regarding aesthetics (visual character) and parking provided here does not relate to the impact significance determinations in the EIR.

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 CEQA Guidelines for determining transportation impacts pursuant to Section 21099(b)(1), automobile delay, as described solely by level of service (LOS) 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* (proposed transportation impact guidelines) recommending that transportation impacts for projects be measured using a vehicle miles traveled (VMT) metric.[8] VMT measures the amount and distance that a project might cause people to drive, accounting for the number of passengers within a vehicle.

OPR's proposed transportation impact guidelines provide substantial evidence that VMT is an appropriate standard to use in analyzing transportation impacts to protect environmental quality and a better indicator of

[8] California Governor's Office of planning and Research, *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, January 20, 2016. This document (and all other documents cited in this report, unless otherwise noted) is available for review at 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case No. 2015-005848ENV. It is also available at https://www.opr.ca.gov/s_sb743.php, accessed January 25, 2017.

greenhouse gas, air quality, and energy impacts than automobile delay. Acknowledging this, San Francisco Planning Commission Resolution 19579, adopted on March 3, 2016:

- Found that automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, shall no longer be considered a significant impact on the environment pursuant to CEQA, because it does not measure environmental impacts and therefore it does not protect environmental quality.
- Directed the Environmental Review Officer to remove automobile delay as a factor in determining significant impacts pursuant to CEQA for all guidelines, criteria, and list of exemptions, and to update the Transportation Impact Analysis Guidelines for Environmental Review and Categorical Exemptions from CEQA to reflect this change.
- Directed the Environmental Planning Division and Environmental Review Officer to replace automobile delay with VMT criteria which promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses; and consistent with proposed and forthcoming changes to the CEQA Guidelines by OPR.

Planning Commission Resolution 19579 became effective immediately for all projects that have not received a CEQA determination and all projects that have previously received CEQA determinations, but require additional environmental analysis.

Accordingly, this EIR does not contain a discussion of automobile delay impacts. Instead, a VMT and induced automobile travel impact analysis is provided in Section IV.B, *Transportation and Circulation*. Nonetheless, automobile delay may be considered by decision-makers, independent of the environmental review process, as part of their decision to approve, modify, or disapprove the proposed project.

I.D.3 Draft EIR and Initial Study Public Review and Opportunities for Public Participation

An Initial Study has been prepared to determine whether any aspect of the proposed project, either individually or cumulatively, would cause a significant effect on the environment. The Initial Study narrowed the focus (or scope) of the environmental analysis by identifying which impacts would be less than significant (with or without mitigation), and, therefore, were adequately analyzed in the Initial Study, and which impacts required further analysis in the EIR. The Initial Study found that the following potential individual and cumulative environmental impacts of the proposed project would result in less-than-significant impacts and did not require further analysis in the EIR: Land Use and Land Use Planning, Population and Housing, Cultural Resources (archeological resources, human remains, and tribal cultural resources), Noise, Air Quality, Greenhouse Gas Emissions, Wind and Shadow, Recreation, Utilities and Services Systems, Public Services, Biological Resources, Geology and Soils, Hydrology and Water Quality, Hazards and Hazardous Materials, Mineral and Energy Resources, and Agriculture and Forest Resources. As such, these issue topics are not further addressed in this EIR. The Initial Study determined that the proposed project could result in potentially significant environmental impacts to the following environmental topics, which are analyzed in this EIR: Cultural Resources (historical architectural resources only) and Transportation and Circulation. The Initial Study has not gone through a separate public review process; however, comments will be accepted on the Initial Study during the public review period for the EIR per CEQA Guideline Section 15128, as discussed below.

The CEQA Guidelines and *San Francisco Administrative Code* Chapter 31 encourage public participation in the planning and environmental review processes. The City will provide opportunities for the public to present comments and concerns regarding this EIR and Initial Study and its CEQA process. These opportunities will occur during a public review and comment period and a public hearing before the San Francisco Planning Commission.

The Draft EIR and Initial Study are available for public review and comment on the Planning Department's Negative Declarations and EIRs web page (http://tinyurl.com/sfceqadocs). CDs and paper copies are also available at the Planning Information Center (PIC) counter on the first floor of 1660 Mission Street, San Francisco. Referenced materials are available for review at the Planning Department's office on the fourth floor of 1650 Mission Street (call 415.575.9028). Documents referenced in this EIR are available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2015-005848ENV. The public comment period for this Draft EIR is from May 11, 2017, to June 26, 2017.

The Planning Commission will hold a public hearing on this Draft EIR during the 47-day public review and comment period for this Draft EIR to solicit public comment on the information presented in this Draft EIR. The public hearing will be held on June 15, 2017, at City Hall, Dr. Carlton B. Goodlett Place, Room 400, beginning at **10:00 a.m. or later** (call 415.588.6422 the week of the hearing for a recorded message giving a more specific time).

The Historic Preservation Commission (HPC) will hold a public hearing on this Draft EIR to consider providing its comments on the Draft EIR. The public hearing will be held on June 7, 2017, at City Hall, Dr. Carlton B. Goodlett Place, Room 400, beginning at **12:30 p.m.** Call 415.558.6320 the week of the hearing for a recorded message giving a more specific time.

In addition, members of the public are invited to submit written comments on the Draft EIR. Written public comments may be submitted to:

San Francisco Planning Department
Attention: Don Lewis, EIR Coordinator
1650 Mission Street, Suite 400
San Francisco, CA 94103
don.lewis@sfgov.org

Comments are most helpful when they comment on the environmental analysis itself or suggest specific alternatives and/or additional measures that would better mitigate significant environmental impacts of the proposed project.

Members of the public are not required to provide personal identifying information when they communicate with the Planning Commission. All written or oral communications, including submitted personal contact information, may be made available to the public for inspection and copying upon request and may appear on the Department's website or in other public documents.

I.D.4 Final EIR and EIR Certification

Following the close of the public review and comment period, the City will prepare and publish a document titled "Responses to Comments on the Draft EIR," which will contain all written and recorded oral comments on this Draft EIR and written responses to those comments, along with copies of the letters or emails received,

a transcript of the public hearing, and any necessary revisions to the Draft EIR. The Draft EIR and the Responses to Comment document will constitute the Final EIR. Not less than ten days prior to the Planning Commission hearing to consider certification of the Final EIR, the Final EIR will be made available to the public and to any board(s), commission(s) or department(s) that will carry out or approve the proposed project. The Planning Commission hearing, in an advertised public meeting(s), will consider the documents and, if found adequate, will certify the Final EIR: (1) has been completed in compliance with CEQA; (2) was presented to the Planning Commission and the Planning Commission reviewed and considered the information contained in the Final EIR prior to approving the proposed project; and (3) reflects the lead agency's independent judgment and analysis.

CEQA requires that agencies shall neither approve nor implement a project unless the project's significant environmental impacts have been reduced to a less-than-significant level, essentially eliminating, avoiding, or substantially lessening the potentially significant impacts, except when certain findings are made. If an agency approves a project that would result in the occurrence of significant adverse impacts that cannot feasibly be mitigated to less-than-significant levels (that is, significant and unavoidable impacts), the agency must state the reasons for its action in writing, demonstrate that mitigation is infeasible based on the EIR or other information in the record, and adopt a Statement of Overriding Considerations.

I.D.5 Mitigation Monitoring and Reporting Program

At the time of project approval, CEQA and the CEQA Guidelines require lead agencies to adopt a reporting and mitigation monitoring program that it has made a condition of project approval in order to mitigate or avoid significant impacts on the environment (CEQA Guidelines Section 21081.6; CEQA Guidelines Section 15097). This EIR identifies and presents mitigation measures and improvement measures that would form the basis of such a monitoring and reporting program. Any mitigation and improvement measures adopted by the Agency and City as conditions for approval of the project would be included in the Mitigation Monitoring and Reporting Program (MMRP).

I.E Organization of the Draft EIR

This EIR has been organized as follows:

- **Summary.** This chapter summarizes the EIR by providing a concise overview of the proposed project, the environmental impacts that would result from the proposed project, mitigation and improvement measures identified to reduce or eliminate these impacts, project alternatives and their comparative environmental effects, and areas of controversy and issues to be resolved.
- **Chapter I, *Introduction*.** This chapter includes a discussion of the purpose of the EIR, a discussion of the environmental review process, a summary of the comments received on the scope of the EIR, and a brief outline of this document's organization.
- **Chapter II, *Project Description*.** This chapter provides a detailed description of the proposed project, including the project background and objectives, project location, existing site land use characteristics, project components and characteristics, development schedule (including anticipated construction activities), and identifies project approvals and the intended uses of the EIR.

- **Chapter III, *Plans and Policies*.** This chapter provides a summary of the plans, policies, and regulations of the City, regional, and State agencies that may be applicable to the proposed project and identifies any potential project conflicts with these policies.
- **Chapter IV, *Environmental Setting, Impacts, and Mitigation Measures*.** This chapter provides analysis for the two resources topics previously identified for further analysis. Each environmental topic contains a description of the environmental setting (or existing conditions), regulatory framework, and project-level and cumulative impacts. Each impact discussion includes the significance criteria used to determine the nature or magnitude of environmental impacts, significance conclusions, and feasible mitigation and improvement measures that would avoid, minimize, or mitigate significant or potentially significant environmental impacts, if feasible. Environmental topics included in this EIR are as follows:
  - Cultural Resources (historical architectural resources only); and
  - Transportation and Circulation.
- **Chapter V, *Other CEQA Considerations*.** Pursuant to Section 15126.2 of the CEQA Guidelines, this chapter summarizes any growth-inducing impacts that could result from the proposed project, irreversible changes to the environment, and significant and unavoidable environmental impacts and this chapter presents any areas of controversy left to be resolved.
- **Chapter VI, *Alternatives*.** This chapter analyzes alternatives to the proposed project, including the required No Project Alternative, and compares their environmental effects to those of the proposed project, and identifies the environmentally superior alternative. Alternatives evaluated in this chapter include the following:
  - Alternative A: No Project Alternative
  - Alternative B: Full Preservation Alternative
  - Alternative C: Partial Preservation Alternative
- **Chapter VII, *EIR Preparers and Persons and Organizations Consulted*.** This chapter presents a list of persons involved in preparation of this EIR, as well as the persons and organizations contacted during preparation of the EIR.
- **Appendices.** The following appendices are included in this EIR: Initial Study (Appendix A), Notice of Preparation of an Environmental Impact Report (NOP) for Case No. 2015-005848ENV (Appendix B), and Public Utilities Commission Resolution and Water Supply Assessment (Appendix C).

CHAPTER II

Project Description

II.A Project Overview

The project sponsor, Strada Brady, LLC, proposes to demolish the existing UA Local 38 building, located at 1621 Market Street; demolish the majority of the Lesser Brothers Building, located at 1629–1645 Market Street; rehabilitate the Civic Center Hotel, located at 1601 Market Street; and demolish the 242-space surface parking lots on the project site. The proposed project would construct five buildings and rehabilitate the Civic Center Hotel as described herein. The proposed project would construct a new four-story UA Local 38 building, and would also construct a 10-story addition to the Lesser Brothers Building at the corner of Brady and Market Streets containing 198 residential units and ground-floor retail/restaurant. A new 10-story building containing 136 residential units and ground-floor retail/restaurant would be constructed on Market Street between the new UA Local 38 building and the mixed-use building at the corner of Brady and Market Streets. A nine-story building containing 78 residential units would be constructed at the end of Colton Street and south of Stevenson Street. The five-story Civic Center Hotel would be rehabilitated to contain 65 residential units and ground-floor retail/restaurant, and a new six-story Colton Street Affordable Housing building containing up to 107 affordable units would be constructed south of Colton Street as part of the proposed project. Overall, the proposed project would include construction of 498,100 square feet of residential use that would contain up to 477 residential units and up to 107 affordable units in the Colton Street Affordable Housing building.[9] In addition, the proposed project would include 27,300 square feet of union facility use, 13,000 square feet of ground-floor retail/restaurant use, and 32,800 square feet of publicly-accessible and residential common open space. The project sponsor would seek amendments to the Zoning Map Height and Bulk Districts and *San Francisco Planning Code* (*Planning Code*) text amendments to create a new special use district and amendments to the Market & Octavia Area Plan land use and height maps and open space policy language. In addition, the project sponsor is seeking approval of a Conditional Use/Planned Unit Development for lot and use size and to allow certain *Planning Code* exceptions. The project sponsor would also seek approval of a Development Agreement with respect to the project sponsor's commitment to develop affordable housing as part of the proposed project and to develop and maintain the Brady Open Space.

II.B Project Sponsor's Objectives

The project sponsor, Strada Brady, LLC, would develop the proposed project. Their project objectives are to:

1. Take advantage of the opportunity to plan and develop a mixed-use development at a significant, underutilized site in a transit-oriented, urban infill location with a building density, mix of uses, and

[9] The proposed project would meet the requirements of the City's Residential Inclusionary Affordable Housing Program (*Planning Code* Sections 415 et seq.) by providing market rate and affordable units within the 477 residential units, as well as up to 107 affordable units in the Colton Street Affordable Housing building, as set forth in the Development Agreement.

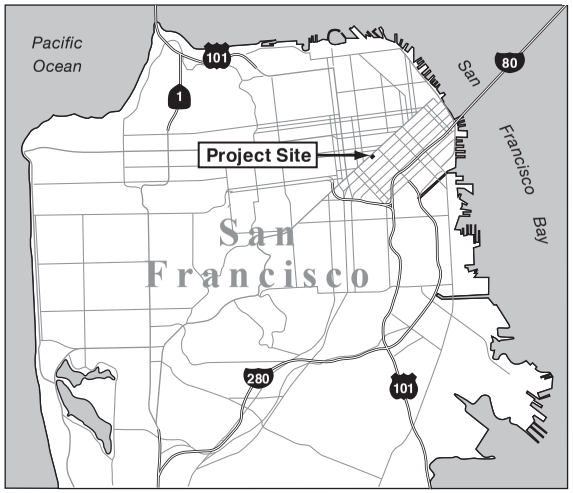
public amenity program that is generally consistent with the overall objectives and policies of the Market & Octavia Area Plan.

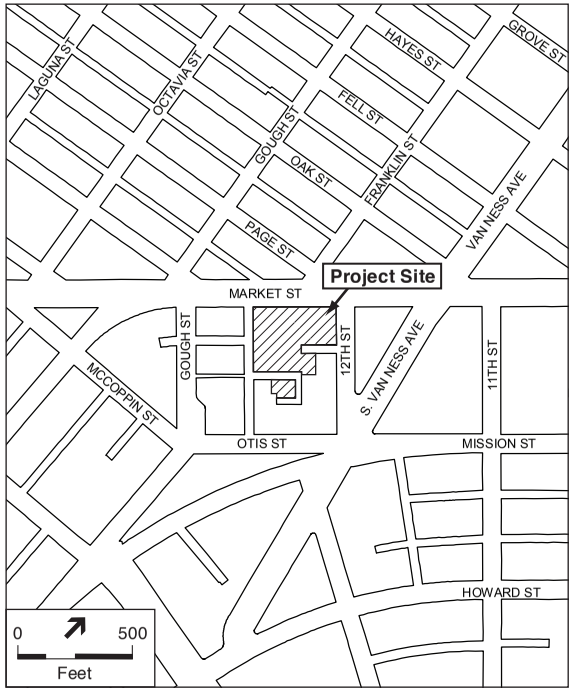
2. Create a mixed-use, mixed-income community that includes on-site market-rate, inclusionary below-market-rate, and supportive housing, along with neighborhood-serving retail and new labor union facilities.
3. Develop the site at an intensity and density that takes advantage of the transit resources in the area and allows the proposed project to remain financially feasible while delivering on-site affordable housing, open space, and other public benefits and community amenities.
4. Produce high-quality architectural and landscape design that encourages variety, is compatible with its surrounding context, and will contribute to Market Street's unique vibrancy through strong urban design and prominent corners at 12th and Brady Streets.
5. Build a transit-oriented development that is committed to sustainable design and programming through its transportation demand management, efficient building systems, and environmentally-conscious construction materials and methods.
6. Preserve the character-defining features of the Civic Center Hotel and retain and renovate portions of the Lesser Brothers Building storefront at 1629–1645 Market Street, and incorporate these resources as integral parts of the overall project design, massing, and street wall context for Market and 12th Streets.
7. Provide affordable housing on the Colton Street portion of the project site at a sufficient density to support on-site social and health services targeted to serve formerly homeless and at-risk residents.
8. Develop a new facility for the property owner and current occupant of the site, United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry Local 38 and its Pension Trust Fund, including offices and union meeting space.
9. Fulfill key City Market & Octavia Area Plan objectives regarding the network of neighborhood-serving open space and pedestrian passageways by designing, developing, and maintaining an approximately 18,000-square-foot Brady Open Space.
10. Encourage pedestrian access to the Brady Open Space with both north/south and east/west access to the site by creating new mid-block alleyways and other streetscape improvements.

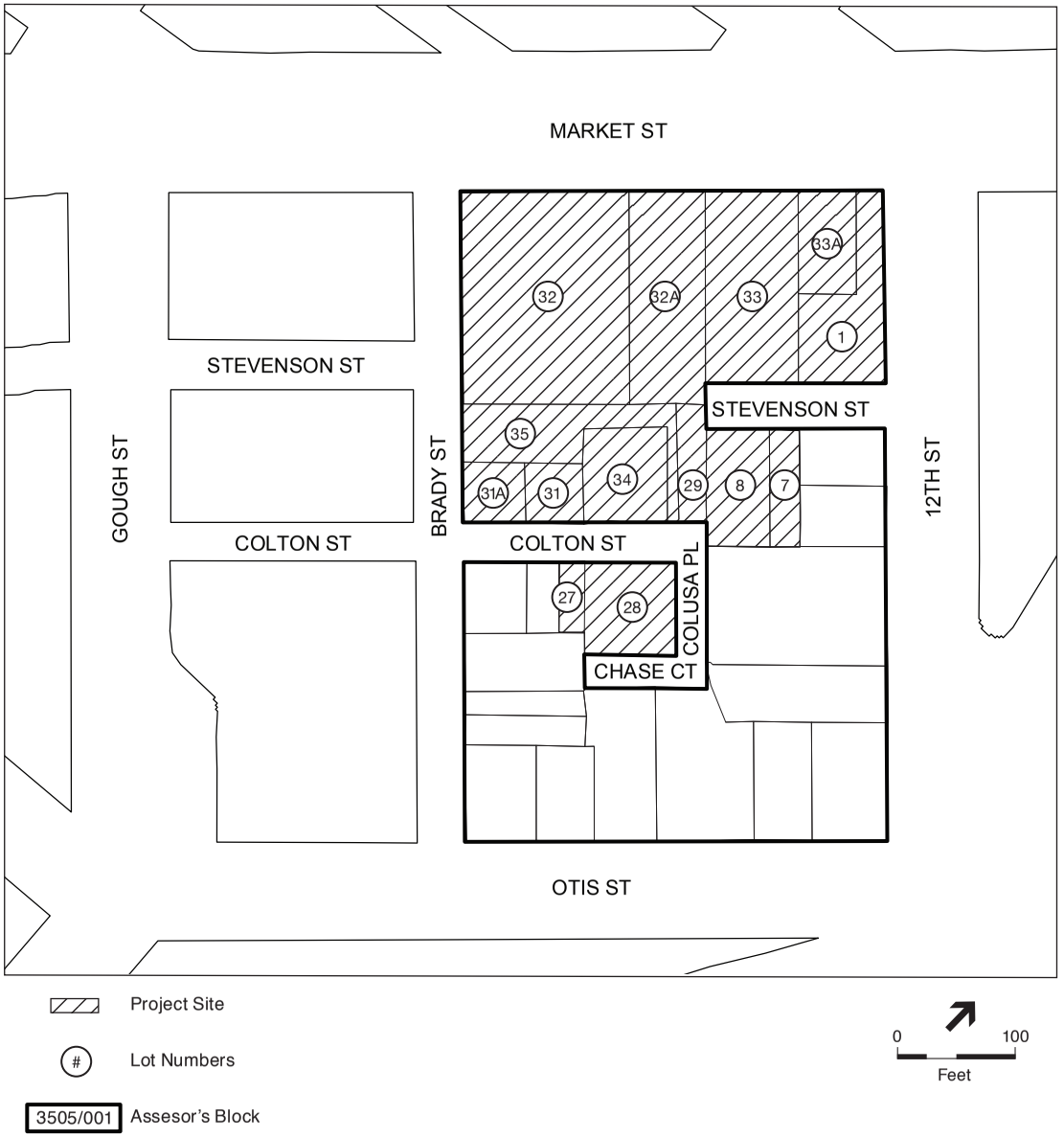
II.C Project Location

II.C.1 Project Site

The approximately 97,617-square-foot (2.2-acre) project site (Assessor's Block 3505, Lots 001, 007, 008, 027, 028, 029, 031, 031A, 032, 032A, 033, 033A, 034, and 035) is on the block bounded by Market, 12th, Otis, and Brady Streets. Stevenson Street, perpendicular to 12th Street, separates Lots 007 and 008 from the lots to the north fronting Market Street (Lots 001, 033, 033A). Colton Street, perpendicular to Brady Street, turns south into Colusa Place in the middle of the block, then west into Chase Court and wraps around Lots 027 and 028 (see **Figure II-1, Project Location**, p. II-3). The project site is located within the Market & Octavia Area Plan, an area plan of the *San Francisco General Plan* (*General Plan*). Most of the site is located within the NCT-3 (Moderate-Scale Neighborhood Commercial Transit) Zoning District, while the southwestern portion of the site, occupying







SOURCE: ESA, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure II-1
Project Location

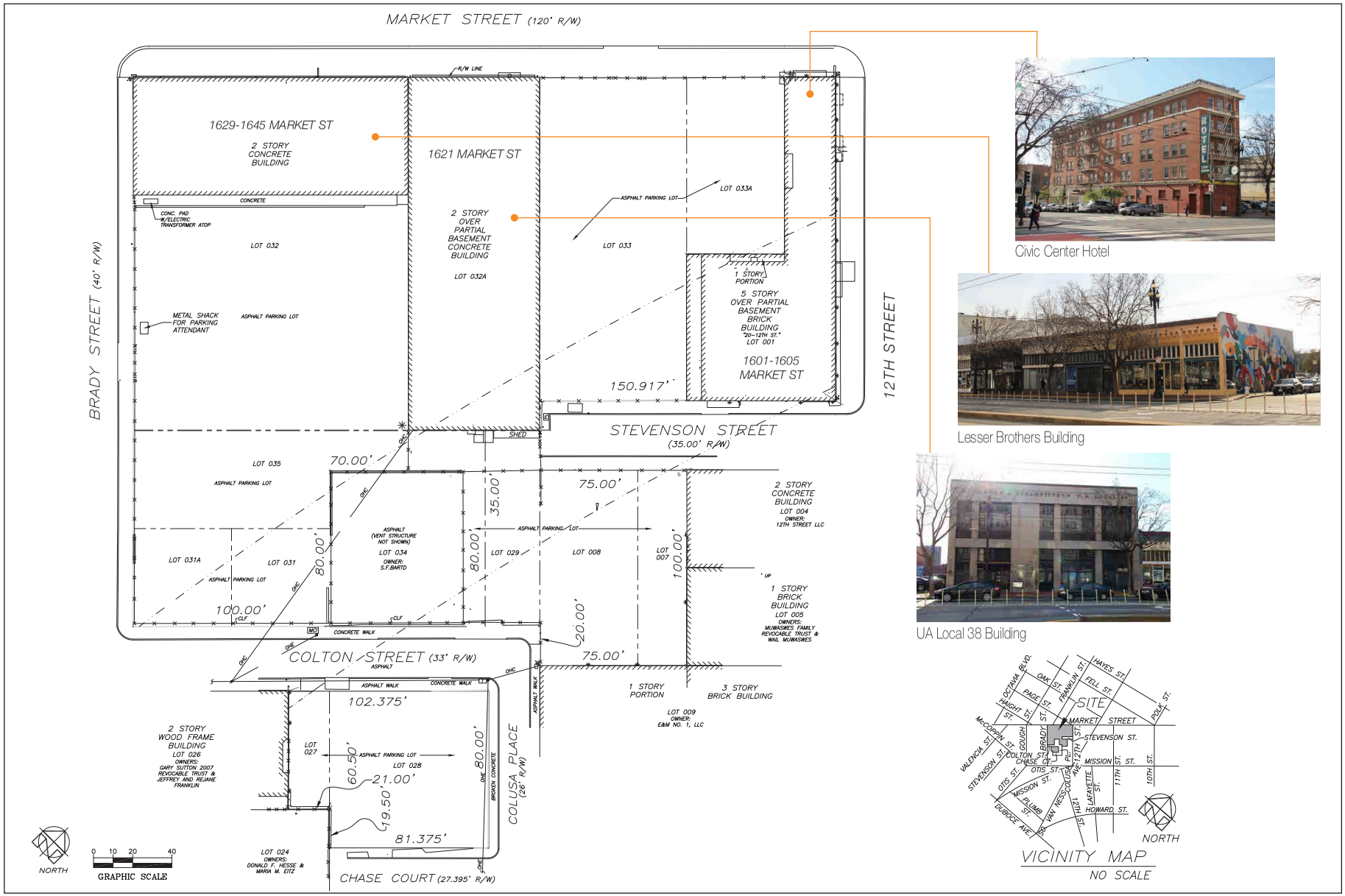
approximately 20,119 square feet is in a P (Public) Zoning District. The P Zoning District is designated in the Market & Octavia Area Plan as the location for a planned open space, referred to as the Brady Open Space. The portions of the project site north of Stevenson Street and east of Colusa Place are located within an 85-X height and bulk district, while the portion of the project site south of Colton Street is in a 40-X height and bulk district.[10] **Figure III-2, Existing and Proposed Height and Bulk District Map**, in Chapter III, *Plans and Policies*, illustrates the height and bulk districts within a one-block radius of the project site.

The project site is generally flat and rectangular in shape with approximately 358 feet of frontage on Market Street and approximately 280 feet of frontage on Brady Street. Project site frontage on 12th Street is approximately 165 feet, and frontage on Stevenson Street is approximately 151 feet along the north side and 75 feet on the south side. The portions of the project site on the north and east side of Colton Street total approximately 137 feet of frontage, while the portion of the project site on the south side of Colton Street totals approximately 102 feet of frontage. The portion of the project site that fronts Colusa Place totals approximately 100 feet.

The project site is currently occupied by four surface parking lots, a BART ventilation structure, as well as three buildings: the Civic Center Hotel, built in 1915; the UA Local 38 building, built in 1923 and extensively remodeled in 1964; and the Lesser Brothers Building, built in 1925 (see **Figure II-2, Existing Site Plan**, p. II-5). The Civic Center Hotel occupies the entirety of Lot 001 as a five-story, 55-foot-tall, 67,200-square-foot building with pedestrian access from 12th Street.[11,12] The Civic Center Hotel is temporarily serving as a Navigation Center (since June 2016) and residential use, and while acting as such, is housing up to 140 transitional occupants supported with up to 14 employees at a single time.[13] The steel- and concrete-frame Civic Center Hotel is an L-shaped building with its principal façades on 12th and Market Streets. It has storefronts and regularly spaced double-hung windows at the upper stories on each of these façades, along with architectural detailing including a sheet metal cornice above the ground floor, a cast stone belt course between the fourth and fifth stories, and a sheet metal cornice and entablature atop each principal façade. The Stevenson Street façade has the same double-hung windows but lacks most of the ornament of the principal façades, while the façade that faces the interior of the block has limited fenestration and no architectural detail. The Civic Center Hotel has a neon blade sign mounted on its Market Street façade.

The existing UA Local 38 building, located on Lot 032A, is a two-story, 35-foot-tall, 24,100-square-foot building containing offices and an assembly hall for the UA Local 38. The building covers the entire lot, and pedestrian access is available from Market Street. A surface parking lot (Lots 033 and 033A), accessible via a curb cut on Market Street, containing 69 off-street vehicle parking spaces is located adjacent to the existing UA Local 38 building. This building, which was heavily remodeled in 1964, is built of reinforced concrete. Its principal Market Street façade is covered in pre-cast concrete panels, with anodized aluminum windows and doors and an aluminum balustrade (railing) at the base of the second-story windows.

[10] Following San Francisco convention, Market Street and streets parallel to it are considered to run east/west, while 12th Street and streets parallel to it are considered to run north/south.
[11] Building heights for the existing buildings and the proposed project do not include rooftop mechanical penthouses. In accordance with Section 260(b)(1)(B) of the *Planning Code*, elevator, stair, and mechanical penthouses would be a maximum of 16 feet in height above the roofline.
[12] Square footages presented for the proposed project are approximate.
[13] A Navigation Center is designed to help homeless people find permanent housing by connecting people with social services and long-term housing or, if individuals wish, help them access Homeward Bound, a city program that buys them a bus ticket home.



Civic Center Hotel

Lesser Brothers Building

UA Local 38 Building

SOURCE: Martin M. Ron Associates; Christopher VerPlanck, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure II-2

Existing Site Plan

The Lesser Brothers Building, located on Lot 032, is a one-story, 20-foot-tall, 13,000-square-foot building. The building fronts on Market Street and covers approximately one-third of the lot. The building was constructed as a retail building with 11 individual storefronts with entrances set in recessed bays. Over time, all but one of the recessed bays has been removed, and the storefronts have been combined so that only five separate shop spaces remain. The area above the storefronts is largely original, with a band of wood-frame transom windows, an arched, stucco-clad frieze, and a pent-roofed parapet clad in red clay tiles. Cement plaster piers extend from the frieze to the sidewalk between each of the six structural bays. The remaining façades are unembellished concrete; with the exception of the northernmost portion of the Brady Street (west) façade, only the rear façade has windows or doors. The Brady Street façade is covered by a mural.

A surface vehicle parking lot (Lots 031, 031A, 032, and 035), accessible via a curb cut on Brady Street, extends south of the building to Colton Street and contains 95 off-street vehicle parking spaces. Another surface parking lot (Lots 007, 008, and 029), accessible via a curb cut on Colton Street, containing 39 off-street vehicle parking spaces is located on the project site south of Stevenson Street. A surface parking lot (Lots 027 and 028), accessible via a curb cut on Colton Street, containing 39 off-street vehicle parking spaces is also located on the project site, bounded by Colton Street to the north, Colusa Place to the east, and Chase Court to the south. The BART ventilation structure is located on Lot 34 (owned by BART) between the two surface parking lots south of Stevenson Street and north of Colton Street.

The existing UA Local 38 building has a California Register Status Code of 6Z, meaning that it is not a historical resource. However, both the Civic Center Hotel and the Lesser Brothers Building have each been determined to appear individually eligible for listing on the California Register of Historical Resources and are considered "Category A" properties—Known Historical Resources—under CEQA.

The primary pedestrian entrance for the Civic Center Hotel is from 12th Street. The primary pedestrian entrance for the UA Local 38 building and the Lesser Brothers Building is from Market Street. The project site contains 10 street trees along Market Street, some of which have been recently planted and others that are more mature. Eight street trees are located along Brady Street, and five street trees are located along Colton Street. Six recently planted street trees are located along 12th Street, for a total of 29 street trees located along sidewalks adjacent to the project site.

Interstate 80 and U.S. Highway 101 (U.S. 101) provide the primary regional access to the project area. Interstate 280 provides regional access from the South of Market Area (SoMa) neighborhood to southern San Francisco, the Peninsula, and the South Bay. South Van Ness Avenue serves as U.S 101 between Market Street and the Central Freeway (at 13th Street), providing direct access to the project site. The Muni Van Ness Station and surface Muni stops on Market Street and Van Ness Avenue are located approximately 550 feet west (0.10 mile) of the project site. There are multiple bus stops located in proximity to the project site, including a stop along South Van Ness Avenue and stops on Mission Street and on Otis Street.

II.C.2 Surrounding Land Uses

Land uses immediately surrounding the project site consist primarily of low- to mid-rise, masonry-clad commercial buildings, including automobile-oriented businesses and urgent care medical services, ranging in height from 25 to 45 feet in height. In addition, older, masonry-clad, mid-rise residential buildings and newer, fiber cement-clad buildings ranging from 45 to 85 feet in height, with ground-floor, neighborhood-serving retail

uses are located along Market Street. Several community facilities, including the San Francisco Conservatory of Music, the International High School and the Chinese American International School, and the San Francisco Law School are located north of the project site near Market Street, and the City College of San Francisco has an auditorium and administrative offices along Gough Street, west of the project site.

On the north side of Market Street across from the UA Local 38 building and the Lesser Brothers Building on the project site is a recently constructed five-story (approximately 60 feet tall) building with residential uses above a Golden Gate Urgent Care facility located on the ground floor, and a three-story (approximately 45 feet tall), masonry-clad residential building with a Pilates studio on the ground-floor. On the north side of Market Street across from the Civic Center Hotel is a six-story (approximately 75 feet tall), brick-clad residential building with ground-floor retail, including two cafes, a bicycle shop, and a small workout/training facility. An approximately 30-foot-tall Honda Dealership and Service Center is located east of the Civic Center Hotel across 12th Street at 10 South Van Ness Avenue. The Ashbury General Contracting & Engineering business is located in a two-story (approximately 35 feet tall) stucco building located south of the Civic Center Hotel across Stevenson Street. A one-story rear portion (approximately 20 feet tall) of a three-story, masonry-clad vacant building forms the southern boundary of the parking lot south of Stevenson Street on the project site, as well as the western boundary of the parking lot bounded by Colton Street to the north, Colusa Place to the east, and Chase Court to the south. The southern boundary of this parking lot is formed by two one-story masonry (approximately 20 feet tall) buildings containing the City Ballet School, LLC and an auto service center. A two-story, wood shingle-clad residence forms the eastern boundary of this parking lot and is located south of Colton Street across from the project site. A one-story (approximately 20 feet tall), wood-clad building containing a full-service sign shop is also located south of Colton Street across from the project site. A five-story (approximately 60 feet tall), brick-clad building containing a hair salon and a clothing and accessories shop on the ground floor and residential uses above is located west of the project site across Brady Street.

The project site is located approximately 0.32 mile southwest of San Francisco City Hall and Civic Center Plaza, a 4.5-acre open plaza with an underground parking garage and surrounded by many of San Francisco's largest government and cultural organizations. Approximately 0.50 mile northeast of the project site is United Nations Plaza, which is owned by the City and is generally bounded by Market Street to the south, McAllister Street to the north, Seventh Street to the east, and Hyde Street to the west. The plaza consists of a 2.6-acre pedestrian mall with seating, lawn areas, a fountain, public art installations, trees, and small gardens with a clear view of City Hall. The plaza is used twice a week for the Heart of the City Farmers Market and is near the San Francisco Public Library, Asian Art Museum, various governmental institutions, offices, and numerous public transportation stops and stations.

In addition to Civic Center Plaza, the proposed project is also located within 0.50 mile of three other parks. Patricia's Green, at Octavia Street between Hayes and Fell Streets, is a 0.45-acre park containing a playground, picnic tables, and art exhibitions, located approximately 0.5 mile northwest of the project site. Page & Laguna Mini Park, mid-block between Rose and Page Streets near Laguna Street, is a 0.15-acre mini park featuring a pathway that leads through flowering beds and apple trees with seating areas, and is located approximately 0.5 mile west of the project site. Koshland Park, at the intersection of Page and Buchanan Streets, is a 0.82-acre park which features multiple play structures, a sand pit, a plaza area, a community learning garden, a half basketball court and grass areas, located approximately 0.5 mile west of the project site. Additionally, Hayes Valley Playground, at the intersection of Hayes and Buchanan Streets, is a 0.61-acre park with a 2,500-square-

foot clubhouse, a playground, a tot-lot, public stage and plaza, outdoor fitness equipment, and community garden plots, located approximately 0.6 mile west of the project site.

II.D Proposed Project Characteristics

The project sponsor, Strada Brady, LLC, proposes to demolish the UA Local 38 building and the existing parking lots on the project site, and demolish a majority of the Lesser Brothers Building. The proposed project would construct five new buildings on the project site (one of which would be located behind the portion of the Lesser Brothers Building proposed to be retained), and rehabilitate the Civic Center Hotel (Building C). Overall, the proposed project would include construction of 498,100 square feet of residential use that would contain up to 477 residential units (including market-rate units and affordable units) in Buildings A through D, as well as up to 107 affordable units in the Colton Street Affordable Housing building, which would provide at least as many affordable units as required to meet on-site inclusionary affordable housing requirements under *Planning Code* Section 415, and further set forth in the Development Agreement (see **Table II-1, Proposed Project Characteristics**, and **Figure II-3, Proposed Site Plan**, p. II-10, **through Figure II-14, View East of the Brady Street Elevation**, p. II-21). In addition, the proposed project would construct 27,300 square feet of union facility use, 13,000 square feet of ground-floor retail/restaurant space along Market, 12th, and Brady Streets in Buildings A, B, and C (Civic Center Hotel), and 32,800 square feet of publicly-accessible and residential open space. The residential unit breakdown for the 477 units would consist of approximately 103 studio units (21.6 percent), 180 one-bedroom units (37.7 percent), and 194 two-bedroom units (40.6 percent).

UA Local 38 Building

The proposed project would include construction of a new four-story, 58-foot-tall, 27,300-square-foot UA Local 38 building with an assembly hall and office space to replace the existing building. The new UA Local 38 building, located between Building B and the rehabilitated Civic Center Hotel (Building C), would front Market Street, and would have no setbacks.

Building A

Upon demolition of a majority of the Lesser Brothers Building, the proposed project would construct a 10-story, 85-foot-tall, 187,100-square-foot addition behind the remaining 140-foot-long Market Street façade (see **Figure II-3, Proposed Site Plan**, p. II-10, "A" Building). The proposed project would retain the primary Market Street façade, including the façade's single-story height, storefronts divided by piers and capped by wood-frame transoms, stucco-clad and cast cement frieze and cornice, and tile-clad pent roof, all of which have been identified as character-defining features of the building (see Section IV.A, *Historic Architectural Resources*). In addition, the project would retain 80 percent (48 of 60 feet) of the west (Brady Street) façade, as well as 40 percent (24 of 60 feet) of the east façade, which currently abuts 1621 Market Street. This partially-retained façade would be newly visible with demolition of 1621 Market Street and development of a pedestrian walkway between Buildings A and B. Building A, located on the corner of Brady and Market Streets, would contain 198 residential units and 6,600 square feet of ground-floor retail/restaurant space along Market Street and a small portion at the southwest corner of the building on Brady Street. The ground floor would contain lobby space behind the

TABLE II-1 PROPOSED PROJECT CHARACTERISTICS

Proposed Use	Description	Approximate Square Feet (sf) [a]
RESIDENTIAL [b, c]		**498,100 sf**
Building A	198 residential units	187,100 sf
Building B	136 residential units	118,300 sf
Building C (Civic Center Hotel)	65 residential units	67,200 sf
Building D	78 residential units	74,700 sf
Colton Street Affordable Housing	Up to 107 affordable units	50,900 sf
RETAIL/RESTAURANT		**13,000 sf**
Building A	Floors 1 and 2 fronting Market Street and a rear portion of Floor 1 fronting Brady Street	6,600 sf
Building B	Floors 1 and 2 fronting Market Street	2,500 sf
Building C (Civic Center Hotel)	Floor 1 fronting 12th Street	4,000 sf
Building D	—	—
UA LOCAL 38 BUILDING		**27,300 sf**
OPEN SPACE	**Residential Common and Publicly-Accessible Open Space**	**32,800 sf**
Residential Common Open Space		***9,300 sf***
Building A		4,600 sf
Building B		2,600 sf
Building C (Civic Center Hotel)		—
Building D		1,500 sf
Colton Street Affordable Housing		600 sf
Privately-Owned, Publicly-Accessible Open Space		***23,500 sf***
Brady Open Space	Accessible from Market, Brady, and Colton Streets	18,300 sf
Mid-block Alley	At Market Street between Buildings A and B	5,200 sf
COMBINED PROJECT		
Total Site Area	Area of parcels at ground level	97,617 sf (2.2 acres)
Total Number of Dwelling Units	Buildings A, B, C, D, and the Colton Street Affordable Housing building	584
Total Publicly-Accessible Open Space	Brady Open Space and mid-block alley	23,500 sf
Total Residential Common Open Space	Roof decks (Buildings A and D, Courtyard Areas)	9,300 sf
Total Vehicle Parking	Buildings A and B, Below-grade Levels 1 and 2—up to 316 spaces (some of which may include stackers), including 3 car-share spaces and 7 ADA-accessible spaces	—
Total Loading Zones/Spaces	3 on-street loading zones (60 feet, 40 feet, and 100 feet in length); 4 off-street commercial loading spaces; 1 on-site move in/move out space (adjacent to Building D)	
Total Class 1 Bike Parking	231 spaces	—
Total Class 2 Bike Sidewalk Racks	42 spaces [d]	—

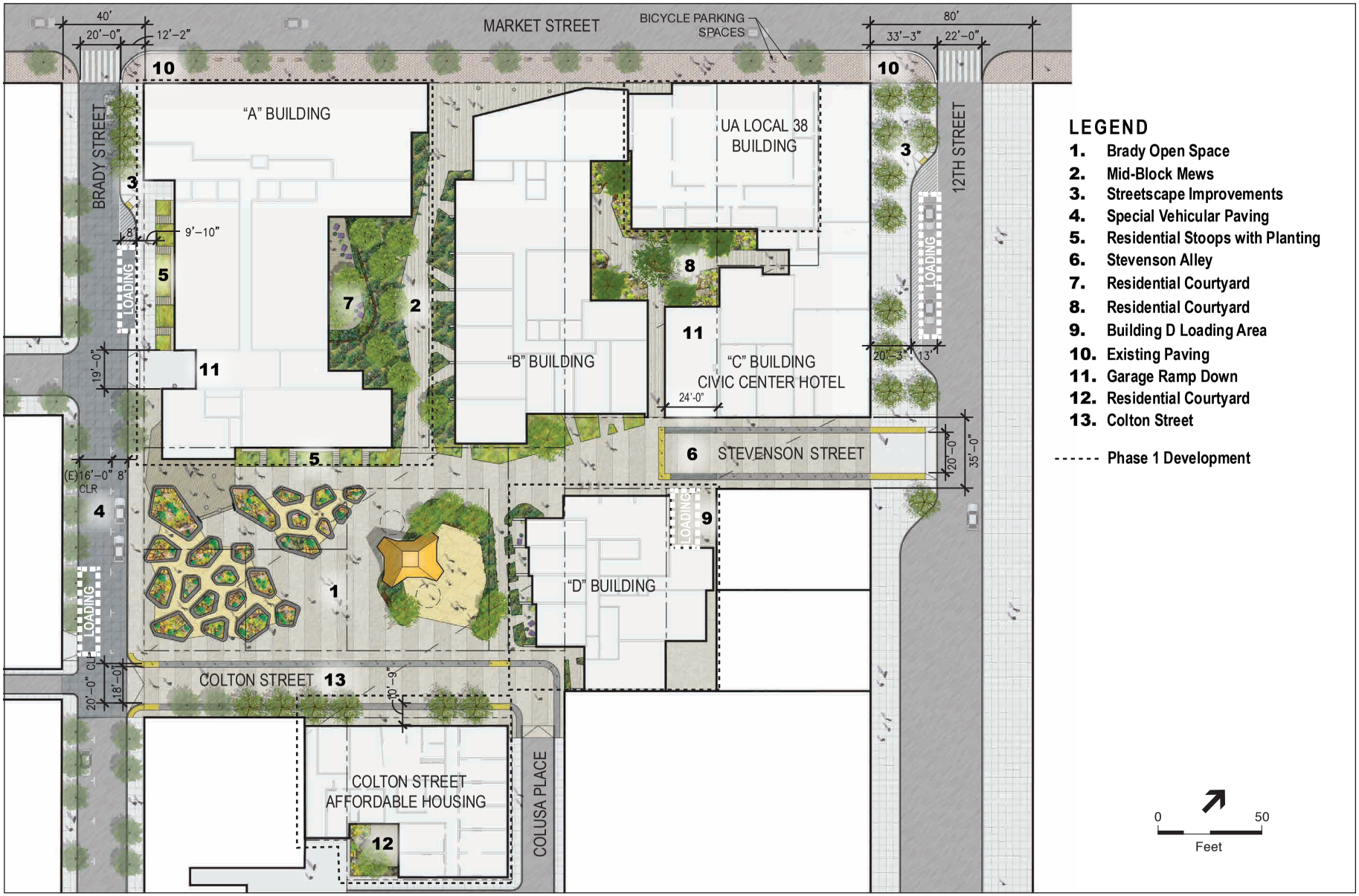
SOURCE: David Baker Architects and Kennerly Architects, September 2016.

a. Square footages may not add up to the totals shown since the numbers are rounded.

b. Includes amenity, circulation, and service space.

c. The proposed project would meet the requirements of the City's Residential Inclusionary Affordable Housing Program (*Planning Code* Sections 415 et seq.) by providing market rate and affordable units within the 477 residential units, as well as up to 107 affordable units in the Colton Street Affordable Housing building, as set forth in the Development Agreement.

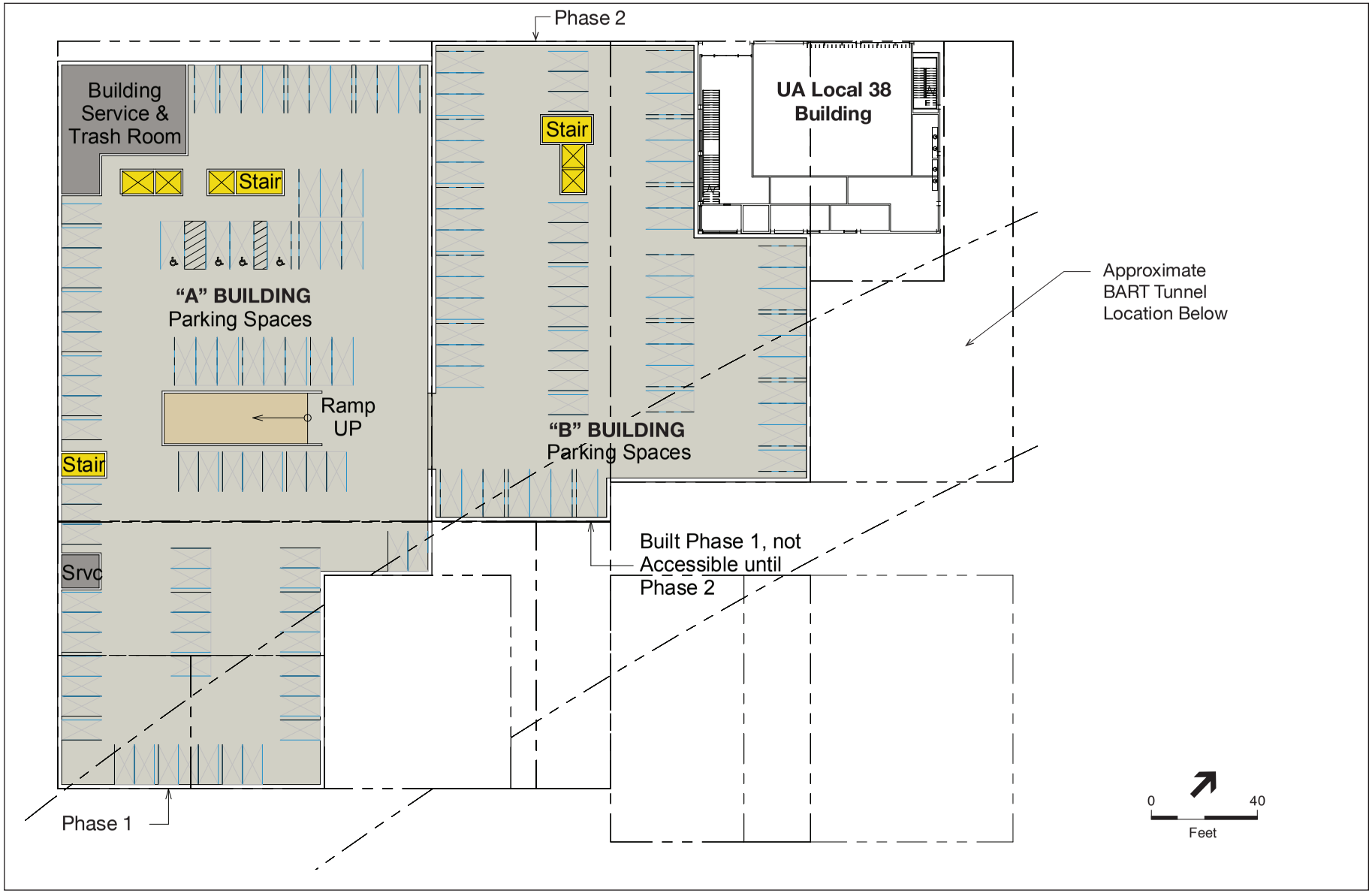
d. These bicycle spaces would be provided on sidewalks adjacent to the project site. The placement of the bicycle racks would comply with the San Francisco Municipal Transportation Agency (SFMTA) rack placement guidelines.



SOURCE: David Baker Architects, Kennerly Architecture & Planning, and Conger Moss Guillard Landscape Architecture, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure II-3
Proposed Site Plan

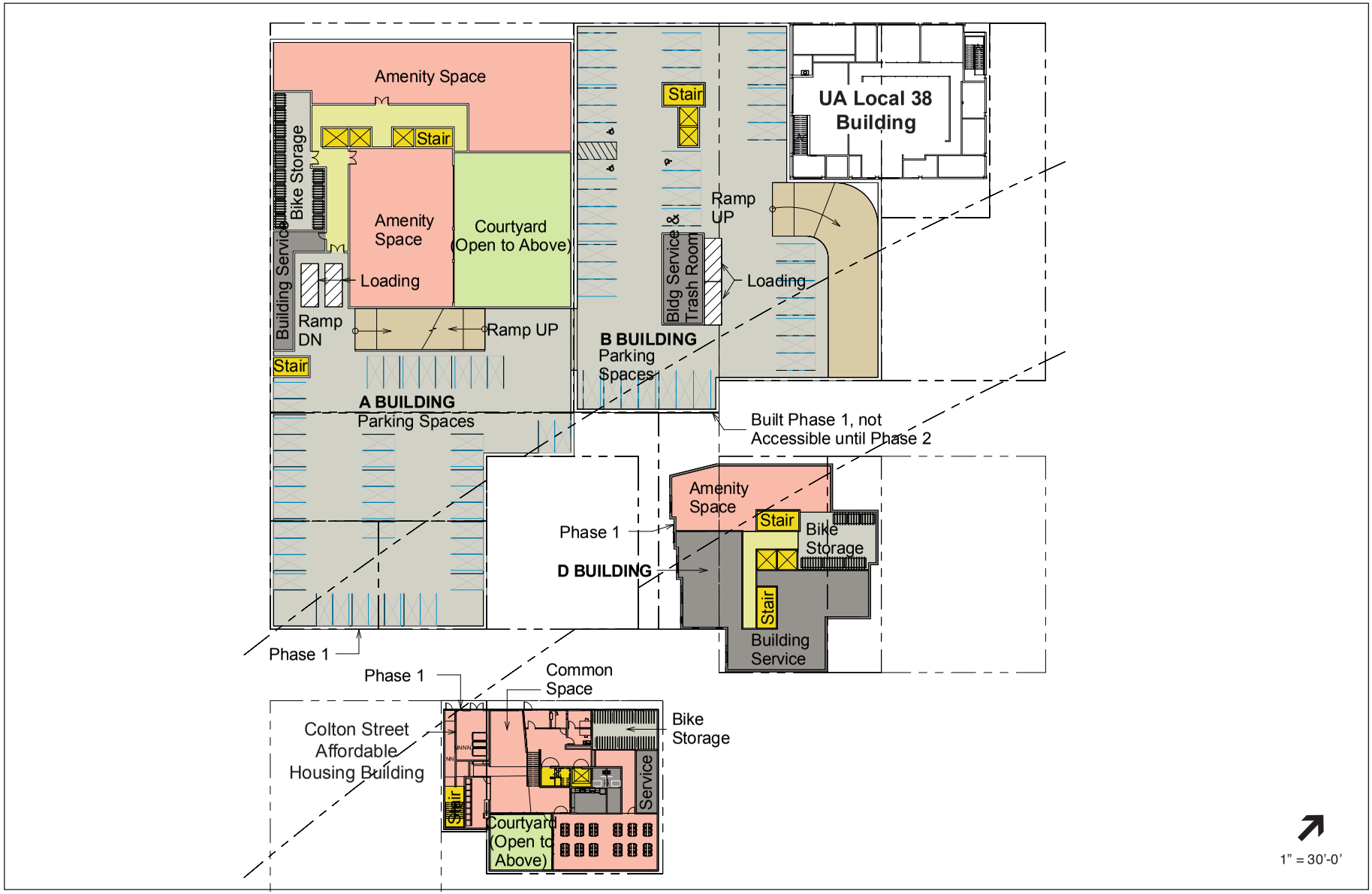


SOURCE: David Baker Architects and Kennerly Architecture & Planning, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure II-4

Basement Level 2 Plan

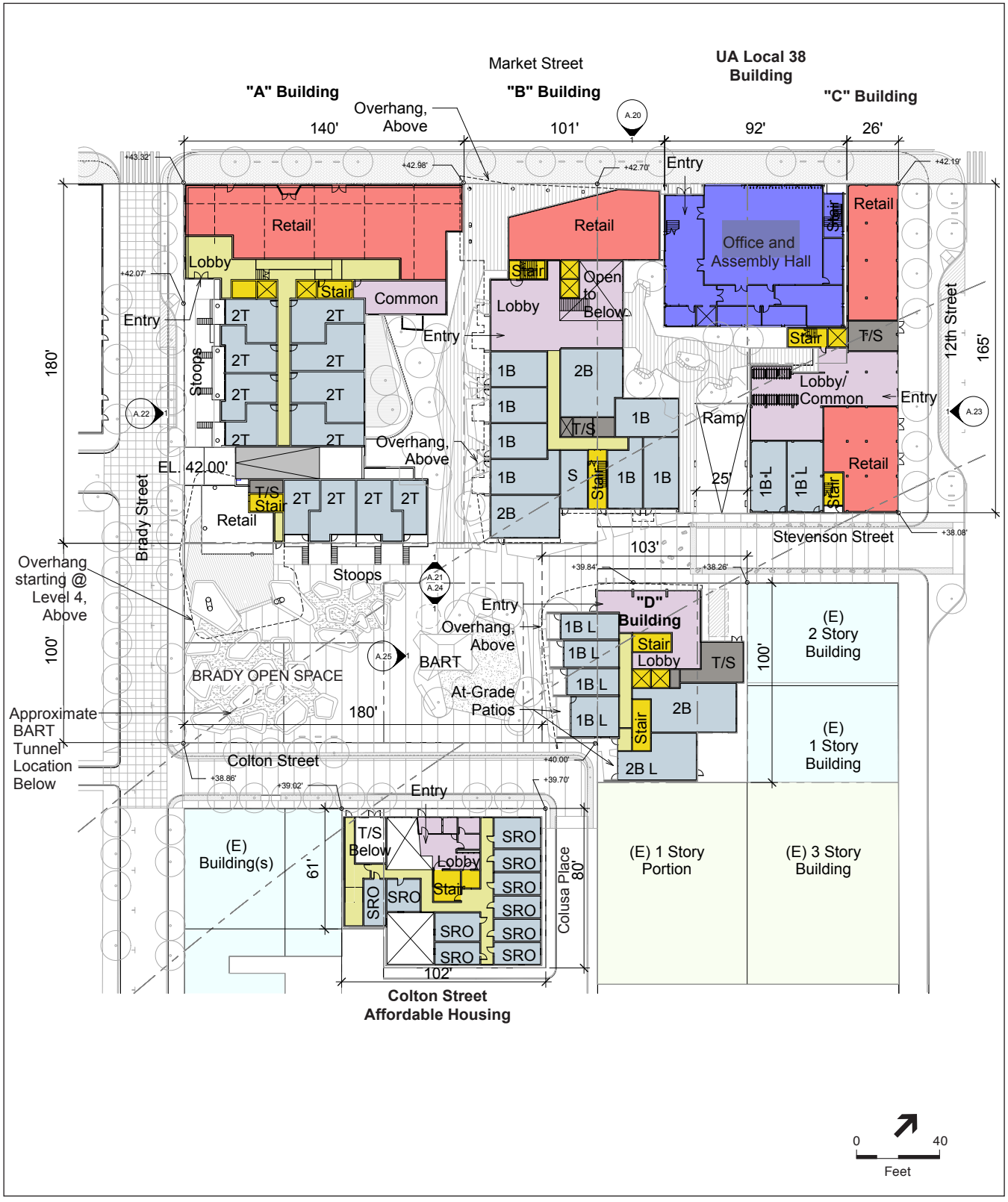


SOURCE: David Baker Architects and Kennerly Architecture & Planning, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure II-5

Basement Level 1 Plan



SOURCE: Kennerly Architecture & Planning, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure II-6
Ground Floor Plan

SOURCE: David Baker Architects and Kennerly Architecture & Planning, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure II-7
2nd Floor Plan

SOURCE: David Baker Architects and Kennerly Architecture & Planning, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure II-8

3rd through 5th Floor Plan

SOURCE: David Baker Architects and Kennerly Architecture & Planning, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure II-9

6th through 9th Floor Plan

SOURCE: David Baker Architects and Kennerly Architecture & Planning, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure II-10

10th Floor and Roof Plan

SOURCE: David Baker Architects, and Kennerly Architecture & Planning, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure II-11

South Elevation at the Brady Open Space

SOURCE: David Baker Architects, and Kennerly Architecture & Planning, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure II-12

North Elevation at Brady Open Space

SOURCE: Kennerly Architecture & Planning and Strada Brady, LLC, 2017

1629 Market Street: Case No. 2015-005848ENV

Figure II-13

View South of the Market Street Facade

SOURCE: Kennerly Architecture & Planning and Strada Brady, LLC, 2017

1629 Market Street: Case No. 2015-005848ENV

Figure II-14

View East of the Brady Street Elevation

retail/restaurant area, with pedestrian entrances for the residential portion of the building available from the mid-block alley and Brady Street. A 19-foot-wide curb cut and garage opening would provide access to the two-level, below-grade parking garage under Building A. The first level of the below-grade parking garage would also contain amenity space, bike storage, and a courtyard open to the ground floor above. Although Building A would rise to a height of 85 feet, the rear portion of the building fronting Brady Street would rise to a height of 72 feet to accommodate a 2,300-square-foot roof deck. The Market Street façade of Building A would be set back by 10 feet from the portion of the Lesser Brothers Building façade proposed to be retained; however, the vertical bay projections and fins would be set back approximately two feet and two inches from the Lesser Brothers Building façade. Additional common open space would be provided along the east side of the building adjacent to the mid-block alley (1,100 square feet) and along the west side of the building on Brady Street (1,200 square feet). The rear façade of the building, supported on V columns, would extend approximately 40 feet over the Brady Open Space at height of approximately 27 feet above the open space.

Building B

Building B, a 10-story, 85-foot-tall, 118,300-square-foot mixed-use building located between Building A and the UA Local 38 building (see **Figure II-3**, "B" Building), would contain 136 residential units and 2,500 square feet of ground-floor retail/restaurant space fronting Market Street. A portion of the front façade of Building B would be slightly set back from Market Street. A portion of the east façade of the building would also step back to accommodate a 2,600-square-foot residential common open space. A residential lobby would be located behind the retail/restaurant area on the ground floor, with pedestrian access available from the mid-block alley and the common open space on the east side of the building.

Building C (Civic Center Hotel)

The existing five-story, 55-foot-tall, 67,200-square-foot Civic Center Hotel, located on the corner of Market and 12th Streets, would be rehabilitated (see **Figure II-3**, "C" Building) to contain 65 residential units and 4,000 square feet of ground-floor retail/restaurant space along Market and 12th Streets. No building expansion is proposed. A residential lobby with pedestrian access from 12th Street would be located between the two retail/restaurant areas at the north and south ends of the building on the ground floor. A 20-foot-wide curb cut and garage opening at the southwest corner of the building would provide access to the two-level, below-grade parking garage under Building B. The rehabilitation of the Civic Center Hotel would retain the building's five-story height and massing and three brick-clad street-facing elevations, the cast stone and sheet metal ornament on the Market Street and 12th Street façades, the street-level storefronts (although the storefronts themselves would be altered), the regular pattern of double-hung windows, and the neon blade sign, although the sign may be relocated and/or the lettering and lighting type and efficiency may be altered. Each of these features has been identified as character-defining features of the building (see Section IV.A, *Historic Architectural Resources*).

Building D

Located east of the proposed Brady Open Space and south of Stevenson Street, Building D, a nine-story, 85-foot-tall, 74,700-square-foot residential building (see **Figure II-3**, "D" Building), would contain 78 residential units. A ground-floor lobby would be located on the north end of the building, with pedestrian access available from the Brady Open Space. A residential move-in/move-out loading space would be located on the east side of the

building fronting Stevenson Street. A curb cut would not be needed because the paving would be flush across Stevenson Street. Building D would include a single basement level to provide building service space, bicycle storage, and amenity space for tenants. A 1,500-square-foot residential common open space would be located on the roof.

Colton Street Affordable Housing Building

The proposed six-story, 68-foot-tall Colton Street Affordable Housing building, located south of Colton Street, would contain up to 107 affordable residential units. A single basement level would provide tenant laundry facilities, work rooms, a kitchen, dining area, bike storage, building service space, and a courtyard open to the ground floor above. A residential lobby with pedestrian access from Colton Street would be located on the ground floor. An approximately 600-square-foot roof deck would be located on the southwest corner of the building. On-site social services that would be provided include one-on-one case management, job training, and health services to assist residents with their transition out of homelessness.

Streetscape Changes

The proposed project would include two driveways across the existing sidewalks; one 19-foot-wide driveway along Brady Street that would use an existing curb cut, and a 24-foot-wide curb cut on Stevenson Street, approximately 140 feet west of the intersection of Stevenson and 12th Streets, which would provide access to the two-level vehicle parking garage located under Buildings A and B. In addition, a bulbout proposed across Stevenson Street at 12th Street would require a new 20-foot-wide curb cut into the bulbout to access Stevenson Street.[14]

The proposed project would also provide two streetscape designs for 12th Street for consideration. Both the "Base Case" and "Enhanced Plan" for the 12th Street streetscape plan would modify pedestrian conditions along the roadway segment. The Base Case would include a raised intersection across 12th Street at the Stevenson Street entrance to the project site, and the Enhanced Plan would convert all of 12th Street into a raised, shared roadway, slowing vehicle traffic and making pedestrian travel safer and more comfortable along the roadway. The proposed project would maintain existing sidewalk widths on Brady, Colton, and Market Streets immediately surrounding the project site and would provide streetscape improvements along 12th Street to widen sidewalks, add street trees, and add bulbouts at the corner of Market and 12th Streets, as well as at the corner of 12th and Stevenson Streets. The Base Case streetscape plan for 12th Street would include 21-foot-wide pedestrian zones on both sides of the street, including a four-foot-wide frontage zone, eight-foot-wide sidewalk, and nine-foot-wide furnishing zone. The Enhanced Plan for 12th Street would include a 40-foot-wide pedestrian zone on the east side of the street and an 18-foot-wide pedestrian zone on the west side of the street. The 40-foot-wide pedestrian zone would include a six-foot-wide sidewalk along the drive lane, a 25-foot-wide promenade area for vendors and seating, and a nine-foot-wide sidewalk adjacent to 10 South Van Ness Avenue. The 18-foot-wide pedestrian zone would include four-foot-wide buffer zones adjacent to the proposed project and drive lane, and a 10-foot-wide sidewalk between the buffer zones. Both designs would include a small plaza on the northwest corner of the intersection of 12th, Mission, and Otis Streets and South Van Ness Avenue.

[14] Stevenson Street is a public alley.

Transportation Demand Management Plan

As required by the City's Transportation Demand Management Program Ordinance (Ordinance 34-17, approved February 2017), the project sponsor would develop a Transportation Demand Management (TDM) Plan that would be subject to review and approval by the Planning Commission as part of its deliberations on the proposed project. Ordinance 34-17 added Section 169, Transportation Demand Management Program, to the *Planning Code*. Under Section 169.3, projects with 10 or more dwelling units, 10 or more group housing units, 10,000 square feet or more of non-residential space, or certain changes of use involving 25,000 square feet or more must develop a TDM Plan. Compliance with the approved TDM Plan would be adopted as a Condition of Approval for the proposed project (Section 169.4(c)).

The TDM Ordinance requires, prior to issuance of a certificate of occupancy, that a property owner facilitate a site inspection by the Planning Department and document implementation of applicable aspects of the TDM Plan; and maintain a TDM Coordinator, allow for Department inspections, and submit periodic compliance reports throughout the life of the project.

For the proposed 1629 Market Street Mixed-Use project, the project sponsor has agreed to implement the following TDM Measures:

1. Active Transportation Measures:
    a. Improve Walking Conditions: provide streetscape improvements to encourage walking, such as creating public pedestrian pathways through the project site to provide better access to the neighborhood and transit.
    b. Bicycle Parking: provide secure bicycle parking
    c. Bicycle Repair Station: provide on-site tools and space for bicycle repair
    d. Temporary Bicycle Valet Parking: provide monitored bicycle parking for 20 percent of guests for large events
2. Car-Share Measure: Provide three car-share parking spaces for project occupants
3. Delivery Measures:
    a. Delivery Supportive Amenities: facilitate deliveries with a staffed reception desk, lockers, or other accommodation
4. Family-Oriented Measure: Provide storage space that can accommodate the storage of car seats, cargo bikes, and shopping carts. Such storage should be located near car-share parking.
5. Information and Communications Measures:
    a. Multi-modal Wayfinding Signage: provide directional signage for locating transportation services (shuttle stop), bicycle parking, and car share parking
    b. Real Time Transportation Information Displays: large screen or monitor that displays, at a minimum, transit arrival and departure information
    c. Tailored Transportation: provide residents and employees with information about travel options
    d. TDM Training: provide TDM training for property managers and coordinators administering services

6. Land Use Measure: Provide on-site affordable housing
7. Parking Management Measure: Provide unbundled parking, separating the cost of parking from the cost of rent, lease, or ownership

The TDM Ordinance contains a "grandfathering" provision applicable to projects, including the proposed 1629 Market Street Mixed-Use project, for which a development application was determined to be complete on or before September 4, 2016; such projects are subject to 50 percent of the point total that would otherwise be the case. The proposed project would be the subject of a Development Agreement, and the project's proposed TDM Program may be refined during preparation of the Development Agreement.

Open Space

The proposed project would provide approximately 32,800 square feet of open space, including publicly-accessible and residential common open space. The proposed project would provide approximately 9,300 square feet of common usable open space for the residential uses proposed by the project. These common usable open spaces would include roof decks on Buildings A and D, and ground-floor open space adjacent to Buildings A, B, C, and the Colton Street Affordable Housing building. The proposed project would also provide approximately 23,500 square feet of privately-owned publicly-accessible open space, including the creation of the planned Brady Open Space (18,300 square feet) at the northeast corner of Brady and Colton Streets and a mid-block alley (5,200 square feet). The mid-block alley would provide access through the project site to the Brady Open Space from Market Street. The Brady Open Space would provide publicly-accessible amenities including seating, landscaping, play equipment, and flexible recreation areas. The BART ventilation structure would remain in place and functioning within the Brady Open Space, but would be screened from view with a sculptural installation or landscape wall. The proposed design is being coordinated and permitted through BART. The design must comply with BART standards to ensure functionality, security, access, and maintenance.

Construction Activities

The proposed project is anticipated to be constructed on a mat foundation. Therefore, the proposed project would entail excavation to a maximum depth of approximately 30 feet to accommodate both the below-grade parking levels and foundation. The proposed project would require excavation of approximately 63,400 cubic yards; Phase 1 excavation would total up to approximately 39,700 cubic yards, and Phase 2 would total up to approximately 23,700 cubic yards. Because the soils beneath the project site consist of artificial fill, Dune sand, and marsh deposits to approximately the proposed depth of excavation, and because these soils may be unsuitable for supporting the proposed structures, soil improvement would likely be required to avoid the potential for soil liquefaction and to properly support the foundation slab. Soil improvement would likely be undertaken by a technique known as deep soil mixing (DSM), in which cement grout is pumped into and mixed with the native soil, essentially creating strengthened columns in the ground that can adequately support a foundation slab. Because of the presence of the BART tunnels beneath the site, DSM columns cannot be created atop the tunnels, and therefore the foundation slab would have to be constructed in a manner such that it could span the area above the BART tunnels between DSM columns on either side of the tunnels. Additionally, within the area designated as BART's Zone of Influence above the tunnels, the proposed project may not place additional weight atop the BART structures. Therefore, the building weight must be offset by excavation of the project's basement levels. BART would review the project's final geotechnical and geological hazards evaluation

reports to ensure compliance with its guidelines for construction over its subway structures. The reports will include an engineering geology map, a site plan showing the location of subway structures, BART easements, a soil reworking plan, and the geological conclusion and recommendations.

Construction staging for Phases 1 and 2 of construction would occur in the proposed Brady Open Space portion of the project site and may also occur on a portion of Stevenson Street. The Brady Open Space would be developed when the construction staging for Phase 2 is complete. During construction, trucks would access the site from Brady, 12th, Colton, and Stevenson Streets.

A number of support poles for Muni overhead wires are located on Market Street, South Van Ness Avenue, Otis Street, and Mission Street. It is anticipated that these support poles would be maintained, but some may require temporary relocation during construction, which would be coordinated through the SFMTA's review of the Special Traffic Permit and of the proposed project's construction management plan.

Construction Schedule

The proposed project would be constructed in two sequential phases. Phase 1 would include construction of the Colton Street Affordable Housing building, the new UA Local 38 building, and Building D, all of which would be located on existing surface parking lots. In addition, Building A, including the two-level, below-grade parking garage, would also be constructed during Phase 1. The two-level, below-grade parking garage under Building B would be completed in Phase 2. Construction of Building A would entail demolition of the majority of the Lesser Brothers Building and construction of a 10-story addition behind the portion of the façade along Market Street proposed to be retained. Residents of the Civic Center Hotel would remain onsite during Phase 1 construction, as would employees of the UA Local 38 building. Following the completion of Phase 1 construction, the new buildings would be available for occupancy. Current long-term residents of the Civic Center Hotel would have the opportunity to move and relocate into the new Colton Street Affordable Housing building, and UA Local 38 would operate in its new location. Phase 2 construction would entail demolition of the existing UA Local 38 building and the construction of Building B and its below-grade parking garage, and the rehabilitation of the Civic Center Hotel (Building C) into a mixed-use building with residential use over ground-floor retail/restaurant. Upon completion of the proposed project, the two garage areas under Buildings A and B would be connected and result in one garage, with access from Brady and Stevenson Streets.

The construction duration for the entire proposed project is estimated to require a total of 44 months. Phase 1 would require 22 months and is anticipated to begin in March 2018, with initial occupancy anticipated to occur by January 2020. Phase 1 would involve demolition and site preparation (including grading and excavation) that would take approximately five months, followed by foundation and below-grade construction requiring two months, then building construction, paving, and architectural coatings would require an additional 11 months, with completion of interiors taking an additional four months.

Phase 2 of the proposed project is anticipated to begin in January 2020 and require 22 months for completion, anticipated by November 2021. Phase 2 would involve demolition and site preparation (including grading and excavation) and would take approximately five months, followed by foundation and below-grade construction requiring two months, then building construction, paving, and architectural coatings would require an additional 11 months, with completion of interiors taking an additional four months.

II.D.2 Height, Massing, and Design

Figure II-15, View West of the Proposed Project from Market and 12th Streets, p. II-28**, through Figure II-17, View East of the Proposed Project from Brady and Colton Streets**, p. II-30, present elevation massing drawings of the proposed project for the north elevation as viewed from Market and 12th Streets and from Market and Brady Streets, and the east elevation as viewed from Brady and Colton Streets, respectively. **Figure II-15** presents the north elevation as viewed from Market and 12th Streets. From left to right, **Figure II-15** presents the rehabilitated Civic Center Hotel with the primary entrance to the ground-floor retail located on Market Street, the new UA Local 38 building with the primary entrance also located on Market Street, and Buildings B and A.

Figure II-16, View East of the Proposed Project from Market and Brady Streets, p. II-29, presents the north elevation as viewed from Market and Brady Streets. At the center of the figure is the residential portion of Building A above the retail/restaurant ground floor located in the portion of the Lesser Brothers Building proposed to be retained. The recessed west elevation of Building A that fronts Brady Street is just visible behind the north elevation. To the left of Building A along Market Street is the north façade of Building B, the new UA Local 38 building, and the Civic Center Hotel.

Figure II-17 presents a view of the Brady Open Space and sculptural installation enclosing the BART ventilation structure. The figure also shows the projecting, elevated bay on the south façade of Building A that sits above the Brady Open Space supported by V columns, as well as a portion of the south façade recessed behind the projecting, elevated bay. Portions of the south facade of Building B are also visible adjacent to Building A. The west elevation of Building D and a portion of Stevenson Street are visible towards the center right behind the sculptural installation. Colton Street and a portion of the Colton Street Affordable Housing building are visible on the far right, south of the Brady Open Space.

II.E Intended Uses of the EIR

This is a project-specific Environmental Impact Report (EIR), intended to provide information about the environmental consequences of the proposed project in accordance with the requirements of the California Environmental Quality Act (CEQA). In addition to describing the proposed project and required approvals, this EIR analyzes potential environmental impacts of the proposed project, identifies feasible mitigation where those impacts are significant, addresses cumulative impacts to which the proposed project could make a substantial contribution, and evaluates alternatives to the proposed project that could avoid or substantially reduce significant impacts while still meeting most of the proposed project's basic objectives. Refer to Chapter I, *Introduction*, for a more detailed description of CEQA requirements.

SOURCE: David Baker Architects, and Kennerly Architecture & Planning, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure II-15

View West of the Proposed Project from Market and 12th Streets

SOURCE: David Baker Architects, and Kennerly Architecture & Planning, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure II-16

View East of the Proposed Project from Market and Brady Streets

SOURCE: David Baker Architects, and Kennerly Architecture & Planning, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure II-17

View East of the Proposed Project from Brady and Colton Streets

II.E.1 Approvals Required

Before discretionary project approvals may be granted for the proposed project by the City or a responsible agency, the San Francisco Planning Commission and Board of Supervisors, as the approval bodies of the lead agency, must certify that the EIR was presented, that the Planning Commission reviewed and considered the information in it, that the EIR complies with CEQA, and that the EIR reflects the City's independent judgment and analysis. The following is a list of discretionary approvals that would or may be required for implementation of the proposed project, if approved, although other approvals may also be necessary. The proposed project is anticipated to require the following approvals:

Planning Commission

- Certification of the Environmental Impact Report, and adoption of findings under CEQA.
- Adoption of findings of consistency with the *General Plan* and priority policies of *Planning Code* Section 101.1.
- Recommendation to the Board of Supervisors of an amendment to the Height and Bulk Map to change the height and bulk designation of the Colton Street Affordable Housing parcel from 40-X to 68-X.
- Recommendation to the Board of Supervisors of an amendment to the Zoning Use District Map (rezoning) to reflect the reconfigured open space parcel for the Brady Open Space.
- Recommendation to the Board of Supervisors of amendments to the Market & Octavia Area Plan including to Map 1 Land Use Districts, Map 3 Height Districts, and Policy 7.2.5 to reflect the updated proposed plan for the Brady Open Space.
- Recommendation to the Board of Supervisors of a Special Use District to reflect other Code compliance and phasing issues on a site-wide basis, such as open space and narrow street setbacks.
- Recommendation to the Board of Supervisors of a Development Agreement with respect to the project sponsor's commitment to develop supportive affordable housing as part of the proposed project and to develop and maintain the Brady Open Space.
- Approval of Conditional Use/Planned Unit Development authorization from the Planning Commission per *Planning Code* Sections 303 and 304 to permit development of a large lot (10,000 square feet and above) and large non-residential use (6,000 square feet and above), and to provide exceptions to the *Planning Code* requirements for: driveway width, rear yard, dwelling unit exposure, active street frontage, loading, and measurement of height, including adoption of the Mitigation Monitoring Reporting Program as part of the conditions of approval.
- Approval of the project's Transportation Demand Management Plan, as required by *Planning Code* Section 169.

Board of Supervisors

- Adoption of findings under CEQA.
- Adoption of findings of consistency with the *General Plan* and priority policies of *Planning Code* Section 101.1.

- Approval of an amendment to the Height and Bulk Map to change the height and bulk designation of the Colton Street Affordable Housing parcel from 40-X to 68-X.
- Approval of an amendment to the Zoning Use District Map (rezoning) to reflect the reconfigured open space parcel for the Brady Open Space.
- Approval of amendments to the Market & Octavia Area Plan including to Map 1 Land Use Districts, Map 3 Height Districts, and Policy 7.2.5 to reflect the updated proposed plan for the Brady Open Space.
- Approval of Special Use District to reflect other *Planning Code* compliance issues on a site-wide basis, such as open space and narrow street setbacks.
- Approval of a Development Agreement with respect to the project sponsor's commitment to develop supportive affordable housing as part of the proposed project and to develop and maintain the Brady Open Space.
- Approval of sidewalk widening legislation.

Department of Building Inspection

- Review and approval of demolition, grading, and building permits.
- If any night construction work is proposed that would result in noise greater than five dBA above ambient noise levels, approval of a permit for nighttime construction is required.
- Permit to provide in-kind replacement of the 71 Single Room Occupancy (SRO) units that are designated as Residential Hotel Units.

San Francisco Public Works

- If sidewalk(s) are used for construction staging and pedestrian walkways are constructed in the curb lane(s), approval of a street space permit from the Bureau of Street Use and Mapping.
- Approval of a permit to remove and replace street trees adjacent to the project site.
- Approval of construction within the public right-of-way (e.g., curb cuts, bulbouts and sidewalk extensions) to ensure consistency with the *Better Streets Plan*.
- Approval of parcel mergers and new subdivision maps.
- Recommendation of sidewalk widening legislation.

San Francisco Municipal Transportation Agency

- Approval of the placement of bicycle racks on the sidewalk, and of other sidewalk improvements, by the Sustainable Streets Division.
- If any portion of the public right-of-way is used for construction staging and pedestrian walkways are constructed in the curb lane(s), approval of a Special Traffic Permit from the Sustainable Streets Division.
- Approval of construction within the public right-of-way (e.g., bulbouts and sidewalk extensions) to ensure consistency with the *Better Streets Plan*.

- Approval of designated color curbs for on-street freight or commercial loading along 12th, Brady, and Stevenson Streets.

San Francisco Public Utilities Commission

- Approval of any changes to sewer laterals (connections to the City sewer system).
- Approval of an Erosion and Sediment Control Plan, in accordance with Article 4.1 of the *San Francisco Public Works Code*.
- Approval of post-construction stormwater design guidelines, including a stormwater control plan that complies with the City's 2016 Stormwater Management Requirements and Design Guidelines.
- Approval of any changes to existing publicly-owned fire hydrants, water service laterals, water meters, and/or water mains.
- Approval of the size and location of the project's new fire, standard, irrigation, and/or recycled water service laterals.
- Approval of the landscape plan per the Water Efficient Irrigation Ordinance.
- Approval of the use of dewatering wells per Article 12B of the *Health Code* (joint approval by the San Francisco Department of Public Health).
- Approval of required documentation per the Non-potable Water Ordinance (joint approval by the San Francisco Department of Public Health).

San Francisco Department of Public Health

- Approval of an Enhanced Ventilation Proposal as required pursuant to Article 38 of the *Health Code*.
- Approval of a Dust Control Plan as required pursuant to Article 22B of the *Health Code*.
- Approval of a Work Plan for Soil and Groundwater Characterization and, if determined necessary by the Department of Public Health, a Site Mitigation Plan, pursuant to Article 22A of the *Health Code*.
- Approval of the use of dewatering wells per Article 12B of the *Health Code* (joint approval by the San Francisco Public Utilities Commission).
- Approval of required documentation per the Non-potable Water Ordinance (joint approval by the San Francisco Public Utilities Commission).

Bay Area Rapid Transit (BART)

- Approval of a Construction Permit for construction on, or adjacent to, the BART right of way. Pertinent design and construction documents would be required to be submitted to BART for review and approval to ensure compliance with their guidelines for construction over its subway structures.

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CHAPTER III

Plans and Policies

III.A Overview

Pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15125(d), this chapter provides a general description of land use plans applicable to the 1629 Market Street Mixed-Use Project. Policy conflicts do not indicate a significant environmental effect within the context of CEQA environmental review. Instead, the intent of CEQA is to determine physical effects associated with a project. To the extent that physical environmental impacts of a proposed project may result in conflicts with one of the goals related to a specific resource topic, such impacts are analyzed in this Environmental Impact Report (EIR) and Initial Study (Appendix A) under the appropriate environmental topic.

Land use plans typically contain numerous policies emphasizing differing legislative goals, and an interpretation of consistency requires the balancing of all relevant policies. In the case of this project, the San Francisco Planning Commission will evaluate the proposed project in accordance with provisions of the *San Francisco General Plan* (*General Plan*), including the Market & Octavia Area Plan.

The staff reports and approval motions prepared for the decision-makers will include a comprehensive project analysis and findings regarding the consistency of the proposed project with applicable plans, policies, and regulations independent of the environmental review process. Plans and policies addressed in this chapter include:

- The *San Francisco Planning Code* (*Planning Code*), including: Allowable Uses, Affordable Housing, Height and Bulk, Open Space and Streetscape Improvements, and Vehicle and Bicycle Parking, and Loading
- The *General Plan*
    - Including the Housing, Urban Design, Recreation and Open Space, and Transportation Elements
- *Area Plans*
    - The Market & Octavia Area Plan[15]
- The *Accountable Planning Initiative*
- The *Climate Action Plan*
- *San Francisco Bicycle Plan*
- The *Better Streets Plan*
- The Transit-First policy
- Transportation Sustainability Program

[15] The Market Street Hub Project is an area plan proposed within the Market & Octavia Area Plan.

- Regional Plans and Policies
  - *Plan Bay Area*, which includes the Sustainable Communities Strategy, Bay Area Air Quality Management District's (BAAQMD's) *2010 Clean Air Plan*, The Metropolitan Transportation Commission, *Regional Transportation Plan—Transportation 2040, and* The *San Francisco Bay Plan*
  - San Francisco Regional Water Quality Control Board's (RWQCB's) *San Francisco Basin Plan*

Sections IV.A, *Historical Architectural Resources*, and IV.B, *Transportation and Circulation*, of this EIR describe pertinent resource-specific plans and policies in the environmental topical area analysis. In addition, specific approval requirements, as they relate to plans or policies, are described in Chapter II, *Project Description* (Section II.E, *Intended Uses of the EIR*).

III.B Plans and Policies Relevant to the Proposed Project

III.B.1 San Francisco Planning Code

The *Planning Code*, which incorporates by reference the City's Zoning Maps, governs allowed uses, densities, and the configuration of buildings in San Francisco. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless either the proposed action conforms to the *Planning Code* or an exception is granted pursuant to provisions of the *Planning Code*.

Allowable Uses

As shown in **Figure III-1, Project Vicinity Zoning Map**, p. III-3, the proposed project is primarily located in the NCT-3 Zoning District (Moderate Scale Neighborhood Commercial Transit District), which is a transit-oriented, moderate- to high-density, mixed-used neighborhood of varying scale concentrated near transit services. As stated in *Planning Code* Section 731, the NCT-3 Zoning District supports neighborhood-serving commercial uses on lower floors and housing above. These districts are well-served by public transit and aim to maximize residential and commercial opportunities on or near major transit services. The district's form can be either linear along transit-priority corridors, concentric around transit stations, or broader areas where transit services crisscross the neighborhood. Housing density is limited not by lot area, but by the regulations on the built envelope of buildings, including height, bulk, setbacks, and lot coverage, and standards for residential uses, including open space and exposure, and urban design guidelines. Residential parking is not required and generally limited. Commercial establishments are discouraged or prohibited from building accessory off-street parking in order to preserve the pedestrian-oriented character of the district and to prevent attracting auto traffic. There are prohibitions on access (i.e., driveways, garage entries) to off-street parking and loading on critical stretches of neighborhood commercial and transit streets to preserve and enhance the pedestrian-oriented character and transit function.

SOURCE: San Francisco Planning Department

1629 Market Street: Case No. 2015-005848ENV

Figure III-1

Project Vicinity Zoning Map

The requirements associated with the NCT-3 Zoning District are described in *Planning Code* Section 731 with references to other applicable articles of the *Planning Code*, as necessary (for example, for provisions concerning parking, rear yards, street trees, etc.). As in the case of other downtown districts, no off-street parking is required for individual commercial or residential uses. In the vicinity of Market Street, the configuration of this district reflects easy accessibility by rapid transit. Any resulting potential impacts of the proposed project and applicable *Planning Code* provisions are discussed below under the relevant topic headings.

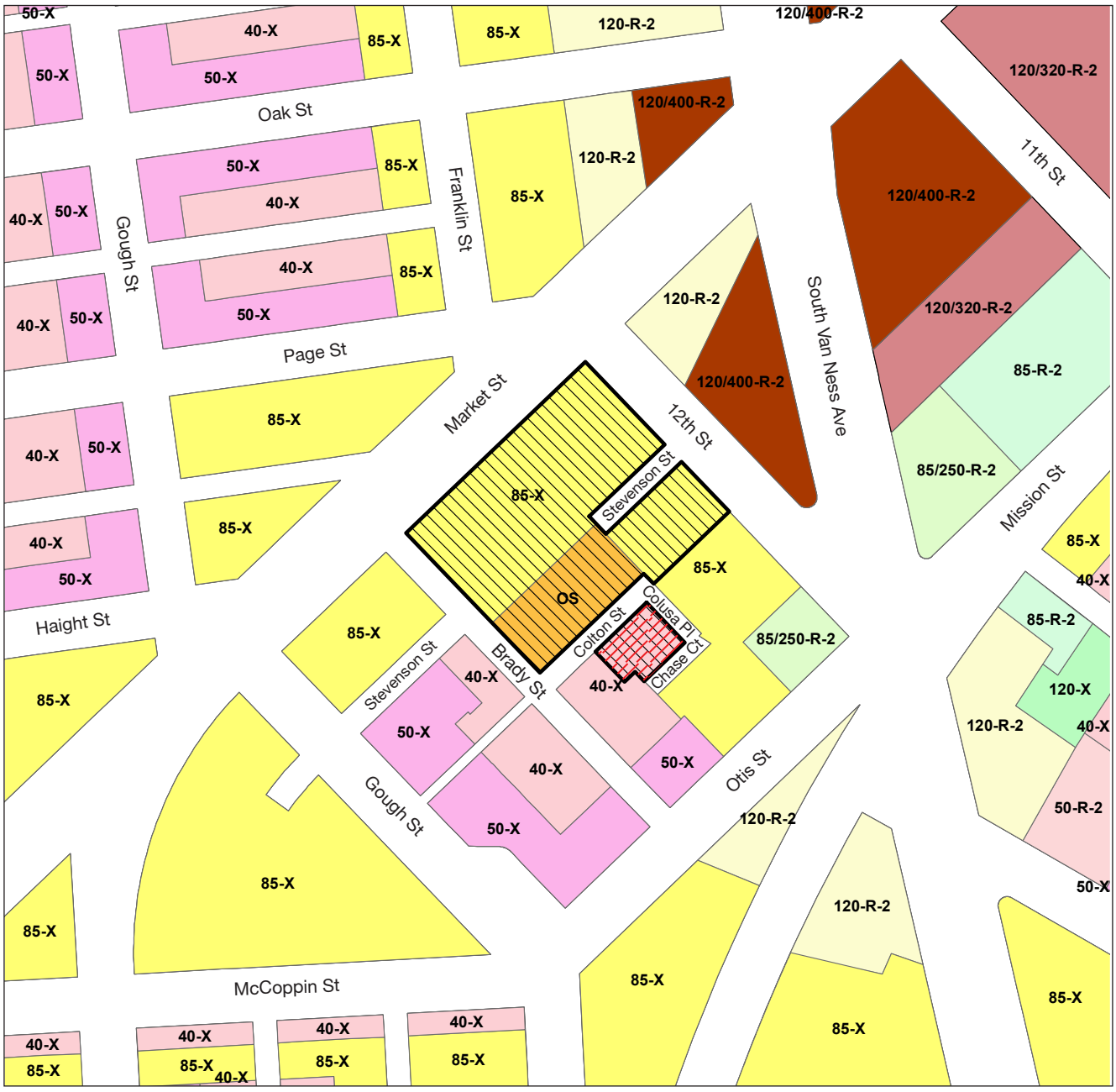
Within the NCT-3 Zoning District, residential and retail/commercial uses, as proposed by the project, are principally permitted, with no density limit on residential uses, and with a FAR of 3.6 to 1.[16] The proposed assembly and office uses within the proposed new UA Local 38 building are also principally permitted in the NCT-3 Zoning District.[17] Therefore, the uses proposed for the project are compatible with the NCT-3 Zoning District.

In addition to NCT-3, a portion of the project site is within the Public Use (P) Zoning District. Uses within P Zoning Districts may include a principal use listed in *Planning Code* Section 211.1 or a conditional use as described. Principally permitted uses in this district include government and public structures, and accessory non-public uses under specific guidelines, Neighborhood Agriculture, (as defined by Section 102 of this code), City Plazas, (as defined by *Administrative Code* Section 94.1), as well as temporary structures under specific guidelines, and Wireless Telecommunications Services Facilities. The proposed use for this portion of the project site is a public open space/park referred to as the Brady Open Space. Additionally, a portion of the P Zoning District property (Lot 34) is owned by BART and contains the ventilation structure for the below-grade BART tunnel. This ventilation structure would remain with the proposed project, but would be covered with a sculptural installation or landscape wall. The remainder of the Brady Open Space would be privately owned and publicly accessible. Therefore, the uses proposed for the project are also compatible with the P Zoning District.

Height and Bulk

The project site falls within three separate Height and Bulk Districts (see **Figure III-2, Existing and Proposed Height and Bulk District Map**, p. III-5). The northern and southeastern portions of the project site along Market Street and south of Stevenson Street are located within an 85-X Height and Bulk District, whereas the central portion of the portion of the project site located east of Brady Street and north of Colton Street is located within an OS (Open Space) Height and Bulk District. The portion of the project site south of Colton Street and west of Colusa Place is located within a 40-X Height and Bulk District. The 85-X district permits a maximum height of 85 feet with no restriction on building bulk. The 40-X district permits a maximum height of 40 feet, with setbacks required as under *Planning Code* Section 261.1 related to additional height limits for narrow streets and alleys in RTO, NC, NCT, Eastern Neighborhoods Mixed-use Districts, and South of Market Mixed-Use Districts.

[16] *Planning Code* Sections 712.20, 731.40, and 731.82.
[17] Ibid., and *Planning Code* Section 731.20.



Project Site Portion of Project Site Proposed to be 68-X

Number indicates permitted height; letter or alphanumeric indicator (e.g., R-2) indicates bulk district. Where two heights are given (e.g.,85/250–R-2), the first number indicates the permitted base height and the second number indicates the maximum height. Bulk limitations apply above the base height to limit the massing of towers.

0 200 Feet

SOURCE: San Francisco Planning Department

1629 Market Street: Case No. 2015-005848ENV

Figure III-2

Existing and Proposed Height and Bulk District Map

The proposed project would rehabilitate the existing Civic Center Hotel (Building C) and construct five new buildings on the project site, one of which would include portions of the retained Lesser Brothers Building (Building A) along Market Street (see **Figure II-3, Proposed Site Plan**, in Chapter II, *Project Description*). Buildings A and B, and the new UA Local 38 building would front primarily on Market Street, while the Civic Center Hotel (Building C) would front primarily on 12th Street and Building D would be located south of Stevenson Street and east of the Brady Open Space. Buildings A, B, and D would range from eight to ten stories in height, and would not exceed the 85-foot-height maximum of the height district. Building C, the rehabilitated Civic Center Hotel, would remain 55 feet tall. The proposed four-story, approximately 58-foot-tall new UA Local 38 building would be below the 85-foot-height maximum height limit. Bulk controls reduce the size of a building's floorplates as the building increases in height. Pursuant to *Planning Code* Section 270(a), there are no bulk controls in an "X" Bulk District, and the proposed project would comply with the bulk designations for Buildings A through D and for the UA Local 38 building.

The proposed six-story, approximately 68-foot-tall Colton Street Affordable Housing building south of Colton Street would exceed the maximum height permitted in the 40-X Height and Bulk District. Therefore, the project sponsor would seek an amendment to the Height and Bulk Map to change the height and bulk designation of the Colton Street Affordable Housing parcel from 40-X to 68-X for the proposed project. Additionally, portions of the proposed Colton Street Affordable Housing building, as well as other buildings on the project site, would not comply with the height controls for narrow streets and alleys in *Planning Code* Section 261.1. Accordingly, the project sponsor seeks approval of a Special Use District that would, among other things, modify these height controls.

Affordable Housing

The proposed project would meet the requirements of the City's Residential Inclusionary Affordable Housing Program (*Planning Code* Sections 415 et seq.) by providing market rate and affordable units within the 477 residential units, as well as up to 107 affordable units in the Colton Street Affordable Housing building, as set forth in the Development Agreement.

Open Space

Planning Code Sections 135 and 136 specifies the amount of usable open space that is required for new residential development in the NCT-3 Zoning District. "Private usable open space" is defined as areas private to and designed for use by only one dwelling unit, while "common usable open space" is defined as an area or areas designed for joint use by two or more dwelling units.

For NCT-3 Zoning Districts, Section 731.93 of the *Planning Code* requires, for most residential uses, 80 square feet of usable open space per dwelling unit if open spaces are private, or 100 square feet of common usable open space per dwelling unit. For dwelling units that measure less than 350 square feet plus a bathroom, such as those proposed for the Colton Street Affordable Housing building, the open space requirement is one-third of the above, or 33 square feet of common usable open space per dwelling unit.

Section 135(a) requires that usable open space shall be composed of an outdoor area that is safe and suitably surfaced and screened; is on the same lot as the dwelling units served; and is designed and oriented in a manner that will make the best use of available sun and other climatic advantages. Section 135(b) also requires that

usable open space shall be as close as practicable to the dwelling unit and shall be accessible from such dwelling unit in two ways: either by private usable open space that is accessible from the bedroom or dwelling; or by common usable open space that is easily and independently accessible from such dwelling or from another common area of the building or lot. In addition, Section 135(g)(1) requires that common usable open space shall be at least 15 feet in every horizontal dimension and shall have a minimum area of 300 square feet.

For the 477 market rate and inclusionary affordable residential units proposed for the project, 100 square feet per unit of common open space would be required, for a total of 47,700 square feet. The 107 units in the Colton Street Affordable Housing building would require approximately 3,531 square feet of common usable open space.

The proposed project would provide approximately 9,300 square feet of common usable open space as roof decks on Buildings A and D, and ground-floor open space adjacent to Buildings A, B, C, and the Colton Street Affordable Housing building. The proposed project would also provide approximately 23,500 square feet of privately-owned publicly-accessible open space, including the Brady Open Space. Thus, the proposed project would provide a total of approximately 32,800 square feet of commonly-accessible and publicly-accessible open space, and would not comply with the *Planning Code* Section 135 requirements for open space. Accordingly, the project sponsor seeks approval of a Special Use District that would, among other things, modify the proposed project's open space requirement.

Streetscape Improvements

Planning Code Section 138.1(c)(1) requires that for every 20 feet of property frontage along each street, one 24-inch box tree be planted, with any remaining fraction of 10 feet or more of frontage requiring an additional tree. The proposed project would consist of approximately 358 feet of frontage on Market Street, approximately 280 feet of frontage on Brady Street, approximately 165 feet of frontage on 12th, and approximately 151 feet of frontage along the north side of Stevenson Street and approximately 75 feet of frontage along the south side of Stevenson Street. The portions of the project site on the north and east side of Colton Street total approximately 137 feet of frontage, while the portion of the project site on the south side of Colton Street totals approximately 102 feet of frontage. The portion of the project site that fronts Colusa Place totals approximately 100 feet. Therefore, street frontage for the project site totals approximately 1,368 feet, which would require 68 street trees. The proposed project would comply with *Planning Code* Section 138.1(c)(1) by retaining or replacing the 29 existing street trees along 12th, Market, Brady, and Colton Streets, and by planting an additional 39 trees, for a total of up to 68 street trees.[18]

Vehicle Parking, Bicycle Parking, and Loading

According to *Planning Code* Section 151.1, off-street parking for residential or commercial uses in an NCT Zoning District is not required; instead up to 0.5 off-street parking spaces per dwelling unit are permitted, or up to 0.75 off-street parking spaces per dwelling unit with a conditional use authorization. The residential component of the proposed project would provide 584 dwelling units, which would permit up to 292 parking spaces. For the combined 40,300 square feet of nonresidential use, an additional one parking space is permitted for every 1,500

[18] Street tree requirements are specified in *Public Works Code* Article 16, Sections 805(a) and (d) and 806(d). If underground utilities or other barriers prevent a street tree from being planted, there are provisions for providing fewer street trees as described in *Planning Code* Section 138.1(c)(2)(C)(iii).

square feet, which would permit 26 additional parking spaces, for a total of 318 permitted parking spaces. As up to 316 parking spaces would be provided (some of which may include stackers), the proposed project would not exceed the maximum number of parking spaces permitted and would comply with *Planning Code* Section 151.

In accordance with *Planning Code* Section 155(i), the proposed project would be required to provide one Americans with Disabilities Act (ADA)-accessible parking space for each 25 parking spaces provided for retail uses, and two percent of the total residential spaces, amounting to seven spaces designated for persons with disabilities. As seven ADA-accessible parking spaces are proposed, the proposed project would meet the *Planning Code* accessible parking requirements

Planning Code Section 166 requires a minimum of two car-share spaces for 201 residential units plus one for every 200 dwelling units over 200. No car-share spaces are required for the 24 parking spaces allocated to non-residential uses. Therefore, the proposed project would require three car-share spaces. As three car-share spaces are proposed, the proposed project would comply with the *Planning Code*.

Planning Code Section 155.2 requires that for new residential buildings over 100 units, 100 secure (Class 1) bicycle parking spaces (bicycle locker or space in a secure room) are provided, plus one Class 1 space for every four dwelling units over 100. One Class 2 space (publicly-accessible bicycle rack) is also required for each 20 units (see **Table III-1, Required and Proposed Bicycle Parking**). Section 155.2 requires that office uses provide one Class 1 space for every 5,000 occupied square feet, and a minimum of two Class 2 spaces for any office use greater than 5,000 feet, with one Class 2 space for each additional 50,000 occupied square feet. For the retail use, Section 155.2 requires one Class 1 space for each 7,500 square feet of occupied space and one Class 2 space for each 2,500 square feet of occupied space. In addition, for the restaurant use, Section 155.2 requires one Class 1 space for each 7,500 square feet of occupied space and one Class 2 space for every 750 square feet of occupied space.

TABLE III-1 REQUIRED AND PROPOSED BICYCLE PARKING

		Required Spaces		Provided Spaces	
Use	**Size**	**Class 1**	**Class 2**	**Class 1**	**Class 2**
Dwelling Units	584 du	221	29	222	29
UA Local 38	27,296 sf	6	2	6	2
Retail	7,000 sf	1	3	1	3
Restaurant	6,000 sf	1	8	2	8
Total	—	***229***	***42***	***231***	***42***

SOURCE: Fehr & Peers, 2016

The proposed project would be required to provide a total 229 Class 1 and 42 Class 2 bicycle parking spaces. As the proposed project would provide 231 Class 1 bicycle spaces on the first level of the below-grade parking

garage and 42 Class 2 bicycle spaces on streets adjacent to the project site, the proposed project would comply with *Planning Code* Section 155.2.[19]

Per *Planning Code* Section 155.4, two showers and 12 clothes lockers are required where the occupied floor area of non-retail sales and service uses exceeds 20,000 square feet but is no greater than 50,000 square feet. Therefore, the UA Local 38 building would require two showers and 12 clothes lockers. The proposed project would provide two showers and 12 clothes lockers in the UA Local 38 building, and therefore would comply with *Planning Code* Section 155.4.

Planning Code Section 152 requires three off-street loading spaces for office and residential uses exceeding 500,000 square feet, and one off-street loading space for retail uses between 10,001 and 60,000 square feet. The proposed project would therefore require a total of four off-street loading spaces. The proposed project would provide five off-street loading spaces, including four 20-foot-long loading spaces in the proposed below-grade parking garage and one move-in/move-out loading space located on the project site east of Building D off Stevenson Street, and would request that the SFMTA designate three on-street loading zones[20] as described below, including:

- **Brady Street:** One 60-foot-long on-street loading zone on the east side of Brady Street adjacent to Building A, and one 40-foot-long on-street loading zone on the west side of Brady Street across from the Brady Open Space;
- **12th Street:** One 100-foot-long on-street loading zone on the west side of 12th Street adjacent to Building C (Civic Center Hotel); and

The off-street loading spaces proposed in the below-grade parking garage comply with the *Planning Code* Section 152 quantity requirements, but do not meet *Planning Code* length requirements.[21] The requested on-street loading zones would supplement the proposed off-street loading supply and would address these dimension limitations.[22] See Section IV.B, *Transportation and Circulation*, of this EIR for a more detailed discussion of loading.

III.B.2 San Francisco General Plan[23]

The *General Plan* sets forth the City's comprehensive, long-term land use policies and direction. The *General Plan* contains 10 elements (Housing, Commerce and Industry, Recreation and Open Space, Transportation, Urban Design, Environmental Protection, Community Facilities, Community Safety, Arts, and Air Quality) that

[19] Placement of the Class 2 bicycle parking racks would comply with the San Francisco Municipal Transportation Agency's (SFMTA) guidelines.
[20] On-street loading zones are subject to review and approval by SFMTA.
[21] *Planning Code* Section 154(b) requires off-street loading spaces to have a minimum length of 35 feet, a minimum width of 12 feet, and a minimum vertical clearance including entry and exit of 14 feet, with the exception of the first space, permitted to have a minimum length of 25 feet, a minimum width of 10 feet, and a minimum vertical clearance including entry and exit of 12 feet. The off-street loading spaces in the below-grade parking garage are proposed to be 20 feet long.
[22] The project sponsor would work with SFMTA to request the on-street loading zones adjacent to the project site and would coordinate with City staff to align the on-street 12th Street loading spaces with the Market Street Hub Project designs for 12th Street. Proposed loading zones would need to be approved by the SFMTA Color Curb Program. The project sponsor would submit a formal application to SFMTA at least 60 days prior to curb completion, with the application plan set showing landscaping kept clear of the sidewalk adjacent to the loading zones.
[23] City and County of San Francisco, *San Francisco General Plan,* 1988, as amended through 2009. Available at http://www.sf-planning.org/ftp/General_Plan/index.htm.

provide goals, policies, and objectives for the physical development of San Francisco. In addition, the *General Plan* includes area plans that outline goals and objectives for specific geographic and community planning areas (such as the Market & Octavia Area Plan, discussed in the following subsection, within which the project site is located).

The Planning Department, Zoning Administrator, Planning Commission, and other City decision-makers will evaluate the proposed project in the context of the *General Plan*, and as part of the project review process will consider potential conflicts. The consideration of *General Plan* objectives and policies would take place independently of the environmental review process. Any potential conflict not identified in this EIR would be considered in that context and would not alter the analysis of physical environmental impacts found in this EIR.

Three *General Plan* elements that are particularly applicable to planning considerations associated with the proposed project are the Housing, Urban Design, and Recreation and Open Space elements of the *General Plan*, as described below and in the following pages. Other elements of the *General Plan* that are applicable to technical aspects of the proposed project include the Transportation Element. The proposed project's consistency with the individual policies contained in these more technical elements is discussed in the appropriate topical sections of this EIR.

Housing Element. The 2014 Housing Element is a component of the *General Plan* that establishes the City's overall housing policies. California State Housing Element law (California Government Code Sections 65580 et seq.) requires local jurisdictions to adequately plan for and address the housing needs of all segments of its population in order to attain the region's share of projected statewide housing goals. This law requires local governments to plan for their existing and projected housing needs by facilitating the improvement and development of housing and removing constraints on development opportunities. San Francisco's 2014 Housing Element was required to plan for an existing and projected housing need of 28,869 new dwelling units. A particular focus of the Housing Element is on the creation and retention of affordable housing, which reflects intense demand for such housing, a growing economy (which itself puts increasing pressure on the existing housing stock), and a constrained supply of land (necessitating infill development and increased density). In general, the 2014 Housing Element supports projects that increase the City's housing supply (both market-rate and affordable housing), especially in areas that are close to the City's job centers and are well-served by transit. The proposed project, which is a mixed-use project containing housing, would not obviously conflict with any objectives or policies in the Housing Element and would further various policies related to increasing production of housing, particularly affordable and supportive housing.

Urban Design Element. As described in the *General Plan*, the Urban Design Element relates to the physical character and order of the city, and the relationship between people and their environment. The element specifically calls for centers of activity to be made more prominent through design of street features and other means (Policy 1.6). Recommended features include street landscaping, lighting, distinctive paving, furniture, and other elements that fit within the context and contribute to the identity of the area, suitable to the needs and desires of merchants, shoppers and other people using the area.

- **Policy 3.4** states that the City shall "promote building forms that will respect and improve the integrity of open spaces and other public areas." This policy's explanation specifically states that large buildings and developments should provide open space on their sites and consider separation of pedestrian and vehicular circulation levels where possible. By providing publicly-accessible open space on the project site, the proposed project would generally be consistent with the urban design policies of the Urban

Design Element (refer to the Market & Octavia Area Plan, and the *Planning Code* discussion in the following pages).

Potential conflicts with Urban Design Element policies are discussed below, beginning with identification of applicable policies for which the project may conflict:

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

The project includes two buildings that have been identified as historic resources under CEQA. Implementation of the proposed project would result in the retention and rehabilitation of the Civic Center Hotel, and the demolition of the majority of the Lesser Brothers Building, considered a historical resource under CEQA due to its eligibility for listing in the California Register under Criterion C (design/construction).[24] Therefore, the demolition of the majority of the Lesser Brothers Building could potentially conflict with Policy 2.4. Associated physical environmental impacts are discussed in Section IV.A, *Historical Architectural Resources*, in this EIR.

Recreation and Open Space Element (ROSE). The *General Plan*'s Recreation and Open Space Element (ROSE), revised and updated in April 2014, addresses the character of the city's open spaces and calls for the preservation and enhancement of open spaces through community engagement. Specifically, the ROSE calls for the acquisition of open space in high needs areas (Policy 2.1), and supporting the development of civic-serving open spaces (Policy 2.6). The ROSE identifies portions of the project site area as a high-needs open space area. As the proposed project would include the development of the publicly-accessible Brady Open Space that would provide passive recreational opportunities in a high needs open space area, the proposed project would not obviously conflict with any objectives or policies in the ROSE.

Transportation Element. The Transportation Element of the *General Plan* is composed of objectives and policies that relate to the eight aspects of the citywide transportation system: General Regional Transportation, Congestion Management, Vehicle Circulation, Transit, Pedestrian, Bicycles, Citywide Parking, and Goods Management. The Transportation Element references San Francisco's Transit First Policy in its introduction, and contains objectives and policies that are directly pertinent to consideration of the proposed project, including objectives related to locating development near transit facilities, encouraging transit use, and timing traffic signals to emphasize transit, pedestrian, and bicycle traffic as part of a balanced multimodal transportation system. The *General Plan* also emphasizes alternative transportation through the positioning of building entrances, making improvements to the pedestrian environment, and providing safe bicycle parking facilities. Implementation of the proposed project could result in potential conflicts with the Transportation Element, particularly with regard to cumulative construction-related transportation impacts. See Section IV.B,

[24] San Francisco Planning Department, *Historic Resource Evaluation Response: 1601–1629 Market Street*, April 17, 2017.

Transportation and Circulation, for a more detailed discussion of potential cumulative construction-related transportation impacts.

Market & Octavia Area Plan[25]

The project site is located in the area referred to as "SoMa West" within the Market & Octavia Area Plan boundaries, an area plan under the *General Plan*. The Market & Octavia Area Plan promotes a mixed-use urban neighborhood in which new and current residents enjoy a vibrant pedestrian realm and rich transit connections. The Area Plan allows for intensive commercial uses and residential uses up to 85 feet clustered around the intersection of Market Street and Van Ness/South Van Ness Avenue (the project site along Market Street between 12th and Brady Streets falls within this area). The building façade, street-level retail uses, and pedestrian-scale design along Market Street are consistent with the Area Plan's design principles.

By replacing existing structures with a high-density residential, retail/restaurant, and office and assembly hall development centered around transit, the proposed project at 1629 Market Street would implement several policies identified in the Market & Octavia Area Plan, including but not limited to Policies 1.1.2 (concentrating uses in areas served by transit), 1.1.5 (reinforcing the importance of Market Street), 1.2.2 (maximize housing opportunities and encourage high-quality commercial spaces on the ground floor), 1.2.7 (encourage new mixed-use infill on Market Street at an appropriate scale and stature), and 7.2.5 (development of Brady Open Space), and Objectives 2.2 (encourage residential infill projects), 2.3 (preserve and enhance existing sound housing stock), 2.4 (provide housing affordable to people at various income levels), and 4.3 (reinforce the significance of the Market Street streetscape and celebrate its prominence). However, the demolition of the majority of the Lesser Brothers Building could be inconsistent with Market & Octavia Area Plan Objective 3.2 to promote the preservation of notable historic landmarks, individual historic buildings, and features that help to provide continuity with the past. Specifically, the partial demolition of the Lesser Brothers Building could be inconsistent with Policy 3.2.1 to preserve landmark and other buildings of historic value as invaluable neighborhood assets. The associated physical environmental impacts are discussed in Section IV.A, *Historical Architectural Resources*, in this EIR.

Additionally, the project includes proposed amendments to Maps 1 and 3 and Market & Octavia Policy 7.2.5 to reflect the updated open space plan and the height for the Colton Street Affordable Housing building. The associated physical environmental impacts are discussed in Topic E.1, *Land Use and Land Use Planning*, Topic E.7, *Wind and Shadow*, Topic E.9, *Recreation*, and Topic E.10, *Utilities and Service Systems*, in the Initial Study (Appendix A) of this EIR.

III.B.3 Accountable Planning Initiative

In November 1986, the voters of San Francisco approved Proposition M, the *Accountable Planning Initiative*, which added Section 101.1 to the *Planning Code* to establish the following eight priority policies:

1. That existing neighborhood-serving retail uses be preserved and enhanced and future opportunities for resident employment in and ownership of such businesses enhanced;

[25] The Market Street Hub ("the Hub") Project is an area plan proposed within the Market & Octavia Area Plan. The Hub Project is discussed under "Cumulative Setting" in Section IV, *Overview*, on page 11.

2. That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods;
3. That the City's supply of affordable housing be preserved and enhanced (refer to Appendix A, Topic E.2, *Population and Housing*, Question 2b, with regard to housing supply and displacement);
4. That commuter traffic not impede Muni transit services or overburden our streets or neighborhood parking (refer to Appendix A, Topic E.7, *Greenhouse Gas Emissions*, and Section IV.B, *Transportation and Circulation*, of the EIR);
5. That a diverse economic base be maintained by protecting our industrial and service sectors from displacement due to commercial office development, and that future opportunities for resident employment and ownership in these sectors be enhanced;
6. That the City achieve the greatest possible preparedness to protect against injury and the loss of life in an earthquake (refer to Appendix A, Topic E.13, *Geology and Soils*, Questions 13a through 13d);
7. That landmarks and historic buildings be preserved (refer to Section IV.A, *Historical Architectural Resources*, of the EIR); and
8. That our parks and open space and their access to sunlight and vistas be protected from development (refer to Appendix A, Topic E.8, *Wind and Shadow*, Questions 8a and 8b and Appendix A, Topic E.9, *Recreation*, Questions 9a and 9c).

The above priority policies are also incorporated into the preamble to the *General Plan*, which is intended to be "an integrated, internally consistent and compatible statement of objectives and policies, and its objectives and policies are to be construed in a manner which achieves that intent." The priority policies "shall be the basis upon which inconsistencies in the General Plan are resolved."[26] Prior to issuing a permit for any project that requires an Initial Study or EIR under CEQA, or issuing a permit for any demolition, conversion, or change of use, and prior to taking any action that requires a finding of consistency with the *General Plan*, the City is required to find that the proposed project would generally be consistent with these priority policies. The demolition of the majority of the Lesser Brothers Building could be inconsistent with the above policy that calls for the preservation of landmarks and historic buildings. However, the proposed project would create neighborhood-serving retail uses, discourage use of commuter automobiles, provide affordable housing, create the Brady Open Space, and retain and rehabilitate the Civic Center Hotel building. The proposed project would not conflict with other *General Plan* polices, including the other priority policies added by the *Accountable Planning Initiative*. Inconsistency with a particular *General Plan* policy does not indicate that a project is inconsistent with the *General Plan* as a whole. Independent of the environmental review process, staff reports for the project will include a more detailed analysis regarding *General Plan* and priority policy consistency for the decision-makers' consideration.

III.B.4 Climate Action Plan

In February 2002, the San Francisco Board of Supervisors passed the *Greenhouse Gas Emissions Reduction Resolution* (Number 158-02) committing the City and County of San Francisco to a greenhouse gas (GHG) emissions reductions goal of 20 percent below 1990 levels by the year 2012. The resolution also directs the San Francisco Department of the Environment, the San Francisco Public Utilities Commission (SFPUC), and other

[26] Preamble to the *San Francisco General Plan*.

appropriate City agencies to complete and coordinate an analysis and planning of a local action plan targeting GHG emission reduction activities. In September 2004, the Department of the Environment and the SFPUC published the *Climate Action Plan for San Francisco: Local Actions to Reduce Greenhouse Gas Emissions* (*Climate Action Plan*). The *Climate Action Plan* examines the causes of global climate change and human activities that contribute to global warming and provides projections of climate change impacts on California and San Francisco from recent scientific reports; presents estimates of San Francisco's baseline GHG emissions inventory and reduction targets; describes recommended emissions reduction actions in the key target sectors—transportation, energy efficiency, renewable energy, and solid waste management—to meet stated goals by 2012; and presents next steps required over the near term to implement the plan. Although the Board of Supervisors has not formally committed the City to perform the actions addressed in the Plan, and many of the actions require further development and commitment of resources, the Plan serves as a blueprint for GHG emission reductions, and several actions are now in progress.

The *Climate Action Plan* cites an array of potential environmental impacts to San Francisco from climate change, including rising sea levels that could threaten coastal wetlands, infrastructure, and property; increased storm activity that could increase beach erosion and cliff undercutting; warmer temperatures that could result in more frequent El Niño storms causing more rain than snow in the Sierras, reducing snow pack that is an important source of the region's water supply; decreased summer runoff and warming ocean temperatures that could affect salinity, water circulation, and nutrients in the Bay, potentially altering Bay ecosystems; other possible effects to food supply and the viability of the state's agricultural system; possible public health effects related to degraded air quality and changes in disease vectors; and other social and economic impacts.

The *Climate Action Plan* presents estimates of San Francisco's baseline GHG emissions inventory and reduction targets. It indicates that burning fossil fuels in vehicles and for energy use in buildings and facilities are the major contributors to San Francisco's GHG emissions, and the Plan includes GHG-reduction strategies such as targeting emission reductions from fossil fuel use in cars, power plants, and commercial buildings; developing renewable energy technologies like solar, wind, fuel cells, and tidal power; and expanding residential and commercial recycling programs. According to the Plan, achieving these goals will require the cooperation of a number of different city agencies. An analysis of potential effects on global warming and GHGs is presented in Appendix A, Topic E.7, *Greenhouse Gas Emissions*, which determined that impacts would be less than significant and would not require further analysis in this EIR.

III.B.5 San Francisco Bicycle Plan

In August 2009, the Board of Supervisors approved the *San Francisco Bicycle Plan* (*Bicycle Plan*). The *Bicycle Plan* includes a citywide bicycle transportation plan and implementation of specific bicycle improvements identified within the *Plan*. The *Bicycle Plan* includes objectives and identifies policy changes that would enhance the City's bike-ability. It also describes the existing bicycle route network (a series of interconnected streets in which bicycling is encouraged), and identifies gaps within the citywide bicycle route network that require improvement. As described in Chapter II, *Project Description*, and earlier in this chapter under Section III.B.A, San Francisco Planning Code, the proposed project would provide bicycle parking consistent with *Planning Code* Section 155.2, thereby encouraging bicycle use. As described in Section IV.B, *Transportation and Circulation*, there are no bike lanes along 12th and Brady Streets that the proposed curb cuts and loading zones under approval from City and County of San Francisco Municipal Transportation Agency (SFMTA) would present a direct

hazard to. Therefore, implementation of the proposed project would not obviously conflict with the *Bicycle Plan*, and this is discussed further in Section IV.B, *Transportation and Circulation*, of this EIR.

III.B.6 Better Streets Plan

In December 2010, the *San Francisco Better Streets Plan* (*Better Streets Plan*) was adopted in support of the City's efforts to enhance the streetscape and the pedestrian environment. The *Better Streets Plan* carries out the intent of San Francisco's Better Streets Policy, which was adopted by the Board of Supervisors on February 6, 2006. The *Better Streets Plan* classifies the City's public streets and right-of-way, and creates a unified set of standards, guidelines, and implementation strategies that guide how the City designs, builds, and maintains its public streets and right-of-way.

The *Better Streets Plan* consists of policies and guidelines for the City's pedestrian realm. Major concepts related to streetscape and pedestrian improvements include (1) pedestrian safety and accessibility features, such as enhanced pedestrian crossings, corner or midblock curb extensions, pedestrian countdown and priority signals, and other traffic calming features; (2) universal pedestrian oriented design, with incorporation of street trees, sidewalk plantings, furnishing, lighting, efficient utility location for unobstructed sidewalks, shared single surface for small streets/alleys, and sidewalk/median pocket parks; (3) integrated pedestrian/transit functions using bus bulbouts and boarding islands (bus stops in medians within the street); (4) opportunities for new outdoor seating areas; and (5) improved ecological performance with incorporation of stormwater management techniques and urban forest maintenance.

The requirements of the *Better Streets Plan* were incorporated into the *Planning Code* as Section 138.1. The proposed project would be consistent with the *Better Streets Plan* by complying with *Planning Code* Section 138.1 through the implementation of the following measures: pedestrian safety and accessibility features; universal pedestrian-oriented streetscape design with incorporation of street trees, street lighting, efficient utility location for unobstructed sidewalks, and sidewalk/median pocket parks; and integrated pedestrian/transit functions using bus bulbouts and boarding islands (bus stops located in medians within the street). Refer to Section IV.B, *Transportation and Circulation*, of this EIR for an analysis of the proposed project's impacts on pedestrian circulation.

III.B.7 Transit First Policy

The City's Transit First Policy was adopted by the Board of Supervisors in 1973, amended in 1999, and is contained in Section 8A.115 of the City Charter. The Transit First Policy is a set of principles that emphasize the City's commitment that the use of public rights-of-way by pedestrians, bicyclists, and public transit be given priority over the private automobile. These principles are embodied in the policies and objectives of the Transportation Element of the *General Plan*. All City boards, commissions, and departments are required by law to implement the City's Transit First Policy principles in conducting the City's affairs.

Under *Planning Code* Section 151.1, the residential component would be permitted to provide up to 0.5 space per dwelling unit for a total of 292 parking spaces, and would be permitted to provide up to 26 parking spaces for the nonresidential uses. The residential component would provide 292 parking spaces, and 24 parking spaces

would be provided for the nonresidential uses, for a total of 316 parking spaces. Therefore, the proposed project would comply with *Planning Code* Section 151.1.

Many of the trips associated with the proposed project are anticipated to be made via public transportation because of the project site's close proximity to numerous Muni routes, including light rail lines in Van Ness Station, and the Civic Center Muni and BART station. In addition, the proposed project would provide 231 Class 1 and 42 Class 2 bicycle parking spaces, which is greater than the 229 Class 1 and 42 Class 2 bicycle parking spaces required under *Planning Code* Section 155.2. Similarly, as discussed above, the parking garage access points would not directly interfere with Muni routes or bicycle paths. Therefore, implementation of the proposed project not obviously conflict with the Transit First Policy; this is discussed further in Section IV.B, *Transportation and Circulation*, of this EIR.

III.B.8 Transportation Sustainability Program

The Transportation Sustainability Program is an initiative aimed at improving and expanding the transportation system to help accommodate new growth, and create a policy framework for private development to contribute to minimizing its impact on the transportation system, including helping to pay for the system's enhancement and expansion. The Transportation Sustainability Program is a joint effort by the Mayor's Office, the San Francisco Planning Department, the SFMTA, and the San Francisco County Transportation Authority (Transportation Authority), and is comprised of the following three objectives:

- **Fund Transportation Improvements to Support Growth**—The Transportation Sustainability Fee (TSF) set forth in *Planning Code* Section 411A is assessed on new development, including residential development, to help fund improvements to transit capacity and reliability as well as bicycle and pedestrian improvements. The new TSF supersedes[27] the Transit Impact Development Fee (TIDF) that was levied on most new non-residential development and also covers additional types of development, including market-rate residential projects to offset new developments' impacts on the transit system. The TSF is applicable to the proposed project.
- **Modernize Environmental Review**—This component of the Transportation Sustainability Program changes how the City analyzes impacts of new development on the transportation system under the California Environmental Quality Act (CEQA). This reform has been helped by California Senate Bill 743, which requires that the existing transportation review standard, focused on automobile delay (vehicular level of service), be replaced with a vehicle miles traveled (VMT) metric. VMT is a measure of the amount and distance that a project causes potential residents, tenants, employees, and visitors of a project to drive, including the number of passengers within a vehicle. Resolution 19579 regarding this reform was adopted at the Planning Commission hearing on March 3, 2016.
- **Encourage Sustainable Travel**—This component of the Transportation Sustainability Program would help manage demand on the transportation network through a Transportation Demand Management (TDM) Program, making sure new developments are designed to make it easier for new residents, tenants, employees, and visitors to get around by sustainable travel modes such as transit, walking, and biking. Each measure that would be included in the TDM program is intended to reduce VMT traveled from new development. *Planning Code* amendments to implement the TDM program, along with TDM Program Standards, were approved by the Planning Commission on August 4, 2016 (Resolutions 19715

[27] *Planning Code* Section 411A.3(e) suspends, with certain exceptions, the operation of Sections 411 et seq. (TIDF), and states the circumstances under which such suspension shall be lifted.

and 19716). The TDM Program Standards were updated on January 17, 2017 (Resolution 19838), and the *Planning Code* amendments were adopted by the Board of Supervisors on February 7, 2017 (Ordinance 34-17).

The proposed project would generally comply with the Transportation Sustainability Program.

III.B.9 Regional Plans and Policies

Plan Bay Area

The 2013 adopted *Plan Bay Area*, which includes the region's Sustainable Communities Strategy, is a collaboration of the following four principal regional planning agencies and their policy documents that guide planning in the nine-county Bay Area: Association of Bay Area Governments (ABAG) *Projections*; BAAQMD *2010 Clean Air Plan* (2010 CAP); the Metropolitan Transportation Commission (MTC) *Regional Transportation Plan—Transportation 2040*; and the San Francisco Bay Conservation and Development Commission (BCDC) *San Francisco Bay Plan*.

ABAG's *Projections* includes long-term forecasts of population, housing, and employment for the nine-county Bay Area, but does not include policies or goals; thus, the proposed project would not be inconsistent with ABAG's *Projections*. Refer also to the discussion under Topic E.2, *Population and Housing*, in the Initial Study included in Appendix A.

BAAQMD's 2010 CAP is a road map that demonstrates how the San Francisco Bay Area will reduce emissions and decrease ambient concentration of harmful pollutants, achieves compliance with the state ozone standards, and reduces the transport of ozone and ozone precursors to neighboring air basins. As described in Appendix A, Initial Study, Topic E.6, *Air Quality*, the proposed project includes applicable transportation and energy and climate control measures to reduce automobile trips and associated emissions and would not conflict with the 2010 CAP.

MTC's *Regional Transportation Plan—Transportation 2040* provides a long-range road map to guide the Bay Area's MTC transportation investments for a 25-year period. The proposed project is not in the vicinity of any of the planned investments and therefore would not conflict with the Regional Transportation Plan.

San Francisco Bay BCDC *San Francisco Bay Plan* provides direction for BCDC's permit authority regarding various activities within its jurisdiction. The proposed project is not located within BCDC's jurisdiction and therefore would not conflict with the Bay Plan.

San Francisco Basin Plan

In addition, the RWQCB *San Francisco Basin Plan* guides planning of the San Francisco Bay Basin. It designates beneficial uses and water quality objectives for waters of the State, including surface waters and groundwater. It also includes programs of implementation to achieve water quality objectives. As described further in the Initial Study (included in Appendix A), the proposed project would not result in substantial water quality effects; thus, the proposed project would not conflict with the Basin Plan.

III.C Summary

Based upon the discussion presented in this section, the proposed project could potentially conflict with policies in the Urban Design Element of the *General Plan,* the Market & Octavia Area Plan, and the Accountable Planning Initiative related to the preservation of historic resources (because the project would eliminate the Lesser Brothers Building's single-story height and massing). As discussed above, the proposed project also implements various policies of the *General Plan*, including the Market & Octavia Area Plan, particularly those related to infill development, residential housing production, and providing affordable and supportive housing, as well as open space. The project application includes requests for amendments to existing land use designations and development controls, including the *General Plan* and the Market & Octavia Area Plan. The staff report for the Planning Commission will evaluate the consistency of the proposed project with *General Plan* policies and applicable *Planning Code* regulations, and the Planning Commission will make a consistency determination as part of the project approval process.

CHAPTER IV

Environmental Setting, Impacts, and Mitigation Measures

Overview

This chapter provides a project-level impact analysis of the physical environmental impacts of implementing the 1629 Market Street Mixed-Use Project as described in Chapter II, *Project Description*. This chapter describes the environmental setting; assesses impacts (off-site, on-site, construction-related, operational, direct, and indirect) and cumulative impacts; and identifies mitigation measures that would reduce or avoid identified significant environmental impacts.

Scope of Analysis

The project sponsor, Strada Brady, LLC, filed an application on July 10, 2015, for the environmental evaluation of the proposed project. The EIR process provides an opportunity for the public to review and comment on the proposed project's potential environmental effects and to further inform the environmental analysis. The San Francisco Planning Department (Planning Department) determined that an EIR was required and published a Notice of Preparation of an Environmental Impact Report (NOP) (Appendix B) announcing this requirement on February 8, 2017, and requested that agencies and interested parties comment on environmental issues that should be addressed in the EIR. The Initial Study concluded that many of the physical environmental impacts of the proposed project would result in less-than-significant impacts, or that mitigation measures agreed to by the project sponsor and required as conditions of approval, would reduce significant impacts to a less-than-significant level. CEQA does not require further assessment of the project's less-than-significant impacts, including the following topical areas: Land Use and Land Use Planning, Population and Housing, Cultural Resources (archeological resources, human remains, and tribal cultural resources), Noise, Air Quality, Greenhouse Gas Emissions, Wind and Shadow, Recreation, Utilities and Services Systems, Public Services, Biological Resources, Geology and Soils, Hydrology and Water Quality, Hazards and Hazardous Materials, Mineral and Energy Resources, and Agriculture and Forest Resources.

The Initial Study (refer to Appendix A) determined that the proposed project could result in potentially significant impacts in the following topic areas addressed in this EIR:

- Cultural Resources (Section IV.A); and
- Transportation and Circulation (Section IV.B).

Senate Bill 743 and CEQA Section 21099

Aesthetics and Parking Analysis

CEQA Statute Section 21099(d) states that "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment."[28] Accordingly, aesthetics and parking are no longer to be considered in determining if a project has the potential to result in significant environmental effects for projects that meet all of the following three criteria:

a) The project is in a transit priority area;[29]

b) The project is on an infill site;[30] and

c) The project is residential, mixed-use residential,[31] or an employment center.[32]

The proposed project meets each of the above three criteria because it is (1) located within one-half mile of several rail, bus, and streetcar transit routes, (2) located on an infill site that is already developed with four surface parking lots, a Bay Area Rapid Transit (BART) ventilation structure, and three buildings: the Civic Center Hotel, which is s temporarily serving as a Navigation Center for formerly homeless individuals (since June 2016); the UA Local 38 building, containing offices and an assembly hall; and the Lesser Brothers Building, containing retail uses; and (3) would include residential, office/assembly hall, and retail/restaurant uses, meeting the definition of a mixed-use residential project.[33] Thus, this EIR does not consider aesthetics and the adequacy of parking in determining the significance of project impacts under CEQA.

CEQA Statute Section 21099(e) states that a lead agency maintains the authority to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers and that aesthetics impacts do not include impacts on historical or cultural resources. Therefore, there is no change in the Planning Department's methodology related to design and historic review.

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[28] Refer to CEQA Statute Section 21099(d)(1).

[29] CEQA Statute 21099(a)(7) defines a "transit priority area" as an area within 0.5 mile of an existing or planned major transit stop. A "major transit stop" is defined in CEQA Statute 21064.3 as a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

[30] CEQA Statute 21099(a)(4) defines an "infill site" as a lot located within an urban area that has been previously developed, or a vacant site where at least 75 percent of the perimeter of the site adjoins, or is *separated* only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

[31] CEQA Statute 21159.28(d) defines a "mixed-use residential" project as a project where at least 75 percent of the total building square footage of the project consists of residential use or a project that is a transit priority project as defined in CEQA Statute 21155. CEQA Statute 21155 defines "transit priority project" as a project that (1) contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75; (2) provides a minimum net density of at least 20 dwelling units per acre; and (3) is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

[32] CEQA Statute 21099(a)(1) defines an "employment center" as a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and located within a transit priority area.

[33] San Francisco Planning Department, *Eligibility Checklist: CEQA Section 21099—Modernization of Transportation Analysis* for 1629 Market Street, June 7, 2016. This document (and all other documents cited in this report, unless otherwise noted) is available for review at 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case No. 2015-005848ENV.

The Planning Department recognizes that the public and decision-makers nonetheless may be interested in information pertaining to the aesthetic effects of a proposed project, and may desire that such information be provided as part of the environmental review process. Therefore, some of the information that would have otherwise been provided in an aesthetics section of this EIR (such as visual simulations of the proposed project) has been included in Chapter II, *Project Description*. However, this information is provided solely for informational purposes and is not used to determine the significance of the environmental impacts of the project, pursuant to CEQA.

Similarly, the Planning Department acknowledges that parking conditions may be of interest to the public and the decision-makers. Therefore, this EIR presents parking demand information in Section IV.B, *Transportation and Circulation*, for informational purposes and considers any secondary physical impacts associated with constrained parking supply (e.g., queuing by drivers waiting for scarce on-site parking spaces that affects the public right-of-way) as applicable in the transportation, air quality, greenhouse gas emissions, noise, and pedestrian safety analyses.

Automobile Delay and Vehicle Miles Traveled Analysis

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 CEQA Guidelines for determining transportation impacts pursuant to Section 21099(b)(1), automobile delay, as described solely by level of service (LOS) 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* (Proposed Transportation Impact Guidelines) recommending that transportation impacts for projects be measured using a vehicle miles traveled (VMT) metric.[34] VMT measures the amount and distance that a project might cause people to drive, accounting for the number of passengers within a vehicle.

OPR's Proposed Transportation Impact Guidelines provides substantial evidence that VMT is an appropriate standard to use in analyzing transportation impacts to protect environmental quality and a better indicator of greenhouse gas, air quality, and energy impacts than automobile delay. Acknowledging this, San Francisco Planning Commission Resolution 19579, adopted on March 3, 2016:

- Found that automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, shall no longer be considered a significant impact on the environment pursuant to CEQA, because it does not measure environmental impacts and therefore it does not protect environmental quality.
- Directed the Environmental Review Officer to remove automobile delay as a factor in determining significant impacts pursuant to CEQA for all guidelines, criteria, and list of exemptions, and to update

[34] California Governor's Office of planning and Research, *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, January 20, 2016. It is also available at https://www.opr.ca.gov/s_sb743.php, accessed September 20, 2016.

the Transportation Impact Analysis Guidelines for Environmental Review and Categorical Exemptions from CEQA to reflect this change.

- Directed the Environmental Planning Division and Environmental Review Officer to replace automobile delay with VMT criteria which promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses; and consistent with proposed and forthcoming changes to the CEQA Guidelines by OPR.

Planning Commission Resolution 19579 became effective immediately for all projects that have not received a CEQA determination and all projects that have previously received CEQA determinations, but require additional environmental analysis.

Accordingly, this EIR does not contain a discussion of automobile delay impacts. Instead, a VMT and induced automobile travel impact analysis is provided in Section IV.B, *Transportation and Circulation*. Nonetheless, automobile delay may be considered by decision-makers, independent of the environmental review process, as part of their decision to approve, modify, or disapprove the proposed project.

CEQA Methodological Requirements

CEQA Guidelines Section 15151 describes standards for the preparation of an adequate EIR. Specifically, the standards under Section 15151 are listed below.

- An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information that enables them to make a decision that intelligently takes into account environmental consequences
- An evaluation of the environmental impacts of a project need not be exhaustive; rather, the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible
- Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts

In practice, the above points indicate that EIR preparers should adopt a reasonable methodology upon which to estimate impacts. This approach means making reasonable assumptions using the best information available. In some cases, typically, when information is limited or where there are possible variations in project characteristics, EIR preparers will employ a "reasonable worst-case analysis" in order to capture the largest expected potential change from existing baseline conditions that may result from implementation of a project.

Economic and Social Impacts

Under CEQA, economic and social effects of a proposed project are not required to be evaluated. However, if the social or economic effects would lead to physical environmental effects, only then would such effects need to be analyzed and addressed in the EIR. CEQA Guidelines Section 15131 states the following specific ways that economic or fiscal effects may be considered as part of the EIR:

- Economic or social effects of a proposed project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a proposed project through anticipated economic or social changes resulting from the proposed project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes

need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.

- Economic or social effects of a proposed project may be used to determine the significance of physical changes caused by the proposed project.
- Economic, social, and particularly housing factors shall be considered by public agencies together with technological and environmental factors in deciding whether changes in a proposed project are feasible to reduce or avoid the significant effects on the environment identified in the EIR.

Format of Environmental Analysis

Each of the resource areas provided in Sections IV.A, *Historical Architectural Resources*, and IV.B, *Transportation and Circulation*, includes the following elements.

Introduction

This subsection includes a brief description of the types of impacts that are analyzed, as well as a summary of the impacts that were scoped out in the Initial Study (that is, impacts that were determined to result in a less-than-significant impact).

Environmental Setting

This subsection presents a description of the existing, baseline physical conditions of the project site and surroundings (e.g., existing land uses, noise environment, transportation conditions) at the time of issuance of the Notice of Preparation of an EIR (NOP) (with respect to each resource topic) in sufficient detail and breadth to allow a general understanding of the environmental impacts of the proposed project.

Regulatory Framework

This subsection describes the relevant federal, state, and local regulatory requirements that are directly applicable to the environmental topic being analyzed.

Approach to Analysis

This section describes the methodology used to analyze potential environmental impacts for each environmental topic under the identified significance criteria. Some evaluations (e.g., VMT and transit capacity in transportation and circulation) are quantitative, while the evaluations for other topics (e.g., cultural resources) are qualitative.

Impact Evaluations

This subsection evaluates the potential for the proposed project to result in direct and indirect adverse effects on the existing physical environment, with consideration of both short-term and long-term effects. The analysis covers all phases of the proposed project, including construction and operation. The significance criteria for evaluating the environmental impacts are defined at the beginning of each impact analysis section, and the approach to analysis explains how the significance criteria are applied in evaluating the impacts of the proposed

project. The conclusion of each impact analysis is expressed in terms of the impact significance as no impact, less-than-significant impact, less-than-significant impact with mitigation, significant and unavoidable impact with mitigation, or significant and unavoidable impact.

Significance Thresholds

Under CEQA, a significant effect is defined as a substantial, or potentially substantial, adverse change in the environment. The guidelines implementing CEQA direct that this determination be based on scientific and factual data, including the entire record for the project, and not on argument, speculation, or unsubstantiated evidence. The significance thresholds (or criteria) used in this EIR are based on the Planning Department's Environmental Planning Division (EP) guidance regarding the thresholds of significance used to assess the severity of environmental impacts of the proposed project. EP guidance is based on CEQA Guidelines Appendix G, with procedures as set forth in *San Francisco Administrative Code* Chapter 31.10. The significance thresholds used to analyze each environmental resource topic are presented in each resource section of Chapter IV, *Environmental Setting, Impacts, and Mitigation Measures*, before the discussion of impacts. The impacts of the proposed project are organized into separate categories based on the criteria listed in each topical section. Project-specific impacts are discussed first, followed by cumulative analysis.

Significance Determinations

The categories used to designate impact significance are described as follows:

- **No Impact.** A no impact conclusion is reached if there is no potential for impacts or the environmental resource does not occur within the project area or the area of potential effects.
- **Less-than-Significant Impact.** This determination applies if the impact does not exceed the defined significance criteria or would be eliminated or reduced to a less-than-significant level through compliance with existing local, state, and federal laws and regulations. No mitigation is required for impacts determined to be less than significant.
- **Less-than-Significant Impact with Mitigation.** This determination applies if the project would result in a significant effect, exceeding the established significance criteria, but feasible mitigation is available that would reduce the impact to a less-than-significant level.
- **Significant and Unavoidable Impact with Mitigation.** This determination applies if the project would result in an adverse effect that exceeds the established significance criteria, and although feasible mitigation might lessen the impact, the residual effect would remain significant, and, therefore, the impact would be unavoidable.
- **Significant and Unavoidable Impact.** This determination applies if the project would result in an adverse effect that exceeds the established significance criteria, and there is no feasible mitigation available to reduce the impact to a less-than-significant level. Therefore, the residual impact would be significant and unavoidable.

Mitigation Measures and Improvement Measures

Mitigation measures are identified, where feasible, for impacts considered significant or potentially significant consistent with CEQA Guidelines Section 15126.4, which states that an EIR "shall describe feasible measures

which could minimize significant adverse impacts." CEQA requires that mitigation measures have an essential nexus and be roughly proportional to the significant effect identified in the EIR. Pursuant to CEQA Guidelines Section 15126.4, mitigation measures are not required for environmental impacts that are not found to be significant. Therefore, for resource topics in which this EIR found the proposed project's physical environmental impact to be less than significant, but for which the Planning Department has identified measures that would further lessen the already less-than-significant impacts of the project, these measures have been identified as "improvement measures." The project sponsor has indicated that, if the project were approved, they would incorporate all improvement measures identified in this EIR as part of the project.

Impacts are numbered and shown in bold type, and the corresponding mitigation measures, where identified, are numbered and indented, and follow impact statements. Impacts and mitigation measures are numbered consecutively within each topic and include an abbreviated reference to the impact section (e.g., LU for Land Use). The following abbreviations are used for individual topics in this EIR:

- CR: Cultural Resources
- TR: Transportation and Circulation

Cumulative Impacts

Cumulative impacts, as defined in CEQA Guidelines Section 15355, refer to two or more individual effects that, when taken together, are "considerable" or that compound or increase other environmental impacts. A cumulative impact from several projects is the change in the environment that would result from the incremental impact of the project when added to those of other closely related past, present, or reasonably foreseeable future projects. Pertinent guidance for cumulative impact analysis is provided in CEQA Guidelines Section 15130:

- An EIR shall discuss cumulative impacts of a project when the project's incremental effect is "cumulatively considerable" (e.g., the incremental effects of an individual project are considerable when viewed in connection with the effects of past, current, and probable future projects, including those outside the control of the agency, if necessary).
- An EIR should not discuss impacts that do not result in part from the project evaluated in the EIR.
- A project's contribution is less than cumulatively considerable, and thus not significant, if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact.
- The discussion of impact severity and likelihood of occurrence need not be as detailed as for effects attributable to the project alone.
- The focus of analysis should be on the cumulative impact to which the identified other projects contribute, rather than on attributes of the other projects that do not contribute to the cumulative impact.

The cumulative impact analysis for each individual resource topic is described in each resource section of this chapter immediately following the description of the direct project impacts and identified mitigation measures.

Approach to Cumulative Impact Analysis

Two approaches to a cumulative impact analysis are provided in CEQA Guidelines Section 15130(b)(1): (a) the analysis can be based on a list of past, present, and reasonably foreseeable probable future projects producing

closely related impacts that could combine with those of a proposed project, or (b) a summary of projections contained in a general plan or related planning document can be used to determine cumulative impacts. The following factors were used to determine an appropriate level for cumulative analysis in this EIR:

- **Similar Environmental Impacts.** A relevant project contributes to effects on resources that are also affected by the proposed project. A relevant future project is defined as one that is "reasonably foreseeable," such as a proposed project for which an application has been filed with the approving agency or has approved funding.
- **Geographic Scope and Location.** A relevant project is located within the geographic area within which effects could combine. The geographic scope varies on a resource-by-resource basis. For example, the geographic scope for evaluating cumulative effects to air quality consists of the affected air basin.
- **Timing and Duration of Implementation.** Effects associated with activities for a relevant project (e.g., short-term construction or demolition, or long-term operations) would likely coincide in timing with the related effects of the proposed project.

The analyses in this EIR employ both the list-based approach and a projections approach, depending on which approach best suits the individual resource topic being analyzed. For instance, the cumulative analysis of cultural resources impacts (for historical architectural resources only) considers individual projects that are anticipated in the project site vicinity that may affect historical architectural resources also affected by the proposed project. By comparison, the cumulative transportation and circulation analysis relies on a projection of overall citywide growth and other reasonably foreseeable projects, which is the typical methodology the Planning Department applies to analysis of transportation impacts. Refer to the following discussion and **Table IV-1, Cumulative Projects in a 0.25-Mile Radius of Project Site**, p. IV-9, for an identification of the cumulative projects and plans located within 0.25 mile of the project site.

Cumulative Setting

Past, present, and reasonably foreseeable cumulative development projects located within 0.25 mile of the project site comprise the list of cumulative projects as of the date of the Notice of Preparation (February 8, 2017), which are listed in **Table IV-1** and mapped on **Figure IV-1, Cumulative Projects within 0.25 Mile of the Project Site**, p. IV-10. In general, these cumulative land use projects are either under construction or are the subject of an Environmental Evaluation Application on file with the Planning Department.[35]

In addition to the cumulative land use projects identified in **Figure IV-1, Cumulative Projects within 0.25 Mile of the Project Site**, p. IV-10, the following area plans, public right-of-way infrastructure projects, and other plans, are also considered part of the cumulative setting:

[35] See Section IV.B, *Transportation and Circulation*, in this EIR for a list of cumulative transportation projects associated with the Market Street Hub Project analysis.

TABLE IV-1 CUMULATIVE PROJECTS IN A 0.25-MILE RADIUS OF PROJECT SITE

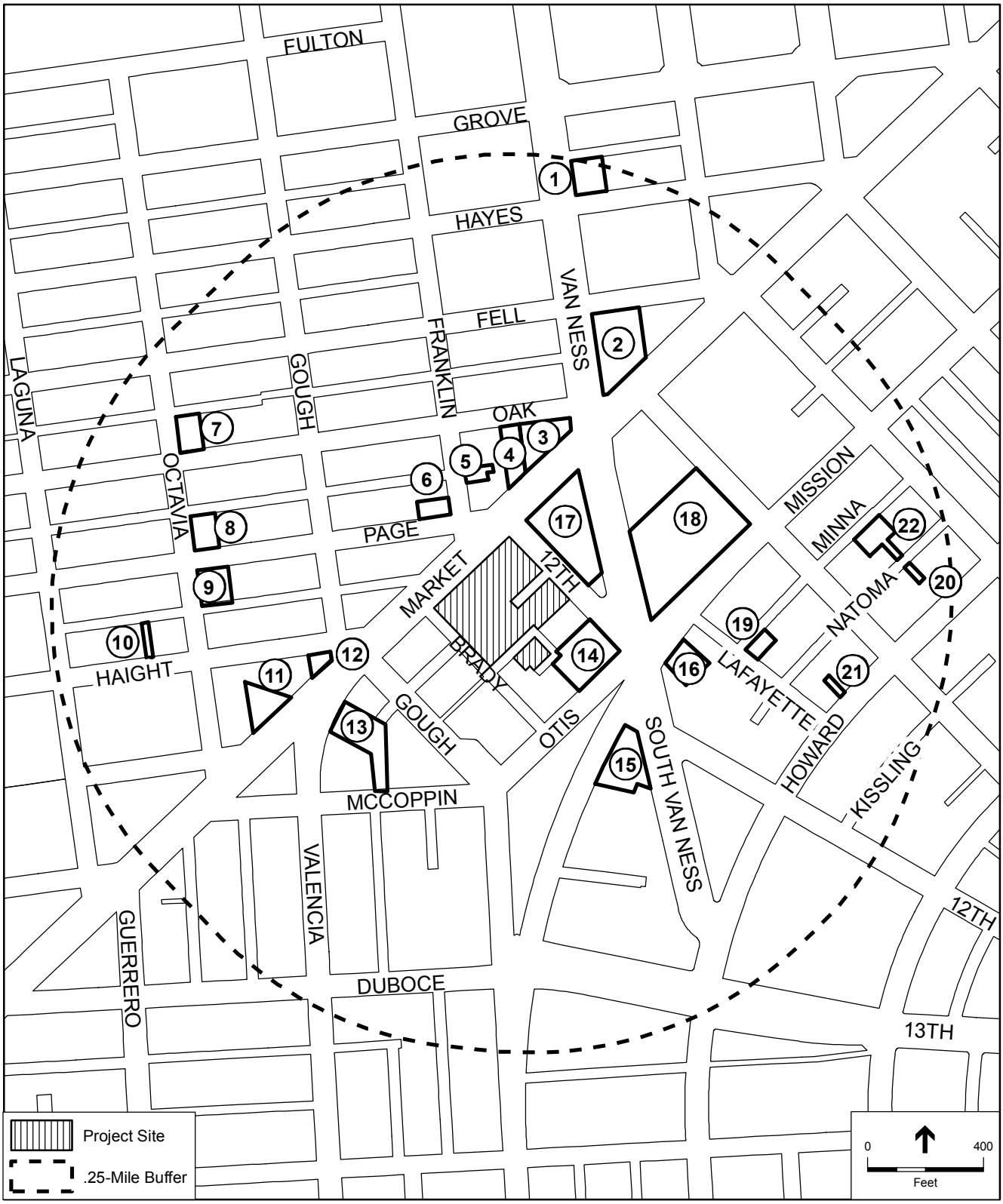
	Name	Case File No.	Dwelling Units (#)	Commercial (sf)	Office (sf)	Child Care	Population (#) [a]
1	200–214 Van Ness Avenue	2015-012994ENV	17				34
2	30 Van Ness Avenue [b]	2015-008571ENV	596	12,000			1,192
3	One Oak Street (formerly 1500–1540 Market Street)	2009.0159E_3	320	12,970			677
4	1546–1564 Market Street	2012.0877E_5	219	4,560			451
5	22 & 24 Franklin Street	2013.1005E	24	1,900			53
6	One Franklin Street	2008.1328E	35	2,400			77
7	300 and 350 Octavia Street (Parcel M & N)	2014-002330ENV	24	1,600			53
8	Octavia Street (Parcels R & S)	2014.1322ENV	TBD	4,925			14
9	188 Octavia Street (Parcel T)	2014.1509ENV	26	5,320			67
10	124 Haight	2015-003952ENV	5				10
11	1740 Market Street	2014.0409ENV	110	7,630			242
12	1700 Market Street	2013.1179E	48	1,549			100
13	1699 Market Street	2014.0484E	160	3,937			331
14	30 Otis Street [c]	2015-010013ENV	354	4,600			721
15	1601 Mission Street (Tower Car Wash)	2014.1121ENV	220	7,336			461
16	1563 Mission Street	2014.0095E			40,600		147
17	10 South Van Ness (Honda Site)	2015-004568ENV	767	20,400			1,592
18	1500–1580 Mission Street (Goodwill site)	2014-000362ENV	560	31,447	449,818	4,377	2,879
19	35 Lafayette Street	2013.0113E	4				8
20	949 Natoma Street	2015-001958ENV	6				12
21	1532 Howard Street	2013.1305E	15				30
22	915 Minna Street	2015-002600ENX	44				88
	Total		***3,554***	***122,574***	***490,418***	***4,377***	***7,108***

SOURCE: San Francisco Planning Department Property Information Database and Active Permits in My Neighborhood Map. Available at http://propertymap.sfplanning.org/, accessed August 23, 2016.

a. The sum population is calculated by adding former columns assuming (1) 2 persons per dwelling unit consistent with Census tract 201 rates, (2) 1 employee per 350 sf of commercial space, (3) 1 employee per 276 sf of office space, and (4) child care employee ratio based one staff member per six children.

b. Although there is no current environmental application for 30 Van Ness Avenue, the development program is based on a conservative assumption of what could be allowed on the site under the current zoning.

c. This project includes approximately 13,125 sf for a ballet school that already exists on the site; therefore, it has not been included in the development program.



SOURCE: San Francisco GIS

1629 Market Street: Case No. 2015-005848ENV

Figure IV-1

Cumulative Projects within 0.25 Mile of the Project Site

- **Market & Octavia Area Plan**, Case No. 2003.0347: The Market & Octavia Area Plan is an adopted element of the *San Francisco General Plan*. The Market & Octavia Area Plan serves to respond to the need for housing, repair the fabric of the neighborhood, and to support transit-oriented development. The Plan includes zoning for residential and commercial uses, prescribes streetscape and open space improvements, and places high-density land uses close to transit. Additionally, the Plan describes infill guidelines for housing on 22 vacant Central Freeway parcels and the creation of a new residential center in the SoMa West / South Van Ness area. To date, development on 10 of the freeway parcels has been completed and projects on another three have been approved but not yet built—at 455 Fell Street (Central Freeway Parcel O) and 300–350 Octavia Street (Parcels M and N). Another nine freeway parcels remain undeveloped.
- **The Market Street Hub (The Hub) Project,** Case No. 2015-000940ENV: The Hub Project would reexamine and propose changes to the current zoning, land use policies and public realm/street designs for the area referred to as "SoMa West" in the *Market Octavia Area Plan*. The Hub Project would include the following zoning components: zoning changes requiring more permanently affordable housing units; zoning changes to incentivize development of affordable housing for artists, office space for non-profit organizations, and performance or fine arts studio space; height district increases to introduce a variety of building heights and smooth height transitions to adjacent areas; study of minor use changes such as inclusion of office beyond current Market & Octavia Area Plan allowances; bulk control increases; zoning changes to reduce parking maximums; transportation demand management policies; and development impact fees. The Hub Project would also include potential public realm and transportation components. The anticipated date of approval for The Hub Project is 2019.
- **Western SoMa Area Plan**, Case No. 2008.0877: The Western SoMa Area Plan is an adopted element of the *San Francisco General Plan*. The Plan Area comprises approximately 298 acres in the western portion of the South of Market. The various components of the Plan, compared to the prior classifications, include increases and decreases in building heights on selected parcels due to height and bulk district reclassifications, increases and decreases in density on selected parcels due to use district reclassifications that replaced density standards with other mechanisms to account for density, such as building envelope controls; and Streetscape improvements along designated streets and intersections, including installation of signalized pedestrian crossings; sidewalk extensions and corner bulbouts; gateway treatments such as signage and lighting; physical roadway features such as enhanced hardscape area, landscaped islands and colored textured pavement; public realm greening amenities (i.e., street trees and planted medians); and other pedestrian enhancements (i.e., street furniture and public restrooms).
- **Van Ness Bus Rapid Transit Project (BRT).** The Van Ness BRT project is a program to improve Muni bus service (i.e., the planned 49R Van Ness-Mission Rapid route) along Van Ness Avenue between Mission and Lombard Streets through the implementation of operational improvements and physical improvements. The operational improvements consist of (1) designating bus-only lanes to allow buses to travel with fewer impediments, (2) adjusting traffic signals to give buses more green light time at intersections, and (3) providing real-time bus arrival and departure information to passengers to allow them to manage their time more efficiently. The physical improvements consist of (1) building high-quality and well-lit bus stations to improve passenger safety and comfort and (2) providing streetscape improvements and amenities to make the street safer and more comfortable for pedestrians and bicyclists who access the transit stations. In the vicinity of the project site, the BRT station in the northbound direction of South Van Ness Avenue will be at Market Street, and the existing curbside bus stop on South Van Ness Avenue north of Mission Street will be discontinued.

- **Muni Forward. T**he Muni Forward Program (formerly Transit Effectiveness Project), includes a comprehensive review of the City's public transit system and provides recommendations designed to make Muni service more reliable, quicker, and more frequent throughout the City. These recommendations include new routes and route extensions, service-related capital improvements, more service on busy routes, designation of rapid transit routes, travel time reduction proposals on the rapid transit routes, and elimination or consolidation of certain routes or route segments with low ridership. Muni Forward proposes changes to the following lines in the proposed project vicinity: 7/7R Haight-Noriega, 9/9R San Bruno, 14/14R Mission, 47 Van Ness, 49 Van Ness, and the 14 Mission Rapid Project.
- **Better Market Street Project.** San Francisco Public Works, in coordination with the San Francisco Planning Department and the SFMTA, proposes to redesign and provide various transportation and streetscape improvements to the 2.2-mile segment of Market Street between Octavia Boulevard and The Embarcadero, and potentially to the 2.3-mile segments of Mission, McCoppin, and Otis Streets between Valencia Street and The Embarcadero. Better Market Street project elements consist of both transportation and streetscape improvements, including changes to roadway configuration and private vehicle access; traffic signals; surface transit, including transit-only lanes, stop spacing, service, stop location, stop characteristics and infrastructure; bicycle facilities; pedestrian facilities; streetscapes; commercial and passenger loading; vehicular parking; plazas; and utilities. Environmental review has recently been initiated, and will analyze three possible alternatives for the project.

  Under this project, Alternatives 1 and 2 involve redesign and improvement of Market Street only, while Alternative 3 would redesign and improve Mission Street in addition to providing the Alternative 1 improvements to Market Street. Alternatives 1 and 2 each have two design options for bicycle facilities on Market Street. Alternative 1 would remove all commercial and passenger loading zones on Market Street, with the exception of paratransit users, and new commercial loading spaces and passenger loading zones would be created on adjacent cross streets and alleys. Under Alternative 2 some commercial loading spaces and passenger loading zones would remain on Market Street, and some commercial loading spaces and passenger loading zones would be created on adjacent cross streets and alleys.

  Alternatives 1 and 2 each include two designs for the bicycle facilities on Market Street: Design Option A and Design Option B. Under Alternatives 1 and 2 Design Option A, an enhanced version of the existing shared vehicle and bicycle lane with painted sharrows (shared lane pavement markings) would be provided at locations where a dedicated bicycle facility is not already present. Under Alternatives 1 and 2 Design Option B, a new raised cycle track (an exclusive bicycle facility that is physically separated from motor traffic and is distinct from the sidewalk for the exclusive or primary use of bicycles) the entire length of Market Street would be provided, except at locations where the BART/Muni station entrances or other obstructions would not allow it. Alternative 3 includes the proposed bicycle facilities on Market Street described under Alternative 1, Design Option A and adds a cycle track in both directions and a floating parking lane (located between the travel lane and the cycle track on one side of the street) on Mission Street. Under Alternative 3, the existing transit-only lanes on Mission Street would be removed and Muni, Golden Gate Transit, and San Mateo County Transit District (SamTrans) bus routes would be moved to Market Street. Design, environmental review, selection of the preferred alternative, and approvals will continue through 2017, and construction of improvements is currently anticipated to start in 2018.[36]

[36] Better Market Street Project information available at http://www.bettermarketstreetsf.org/about-common-questions.html, accessed February 14, 2017.

IV.A Historical Architectural Resources

IV.A.1 Introduction

"Cultural resources" include historical architectural resources, archeological resources, and tribal cultural resources, each of which may be considered a "historical resource." Cultural resources also include human remains. The Initial Study determined that the proposed project would have a less-than-significant impact, with mitigation, on archeological resources, tribal cultural resources, and human remains. Accordingly, this section is limited to analysis of impacts on historical architectural resources.

A "historical resource" is defined, under CEQA Section 21084.1, as a resource that is listed in, or determined eligible for listing in, the California Register of Historical Resources (California Register). In addition, a resource that (i) is identified as significant in a local register of historical resources, such as Article 10 and Article 11 of the *San Francisco Planning Code* (*Planning Code*), or (ii) is deemed significant due to its identification in a historical resources survey meeting the requirements of California Public Resources Code Section 5024.1(g), is presumed to be historically significant "unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant." CEQA Guidelines Section 21084.1 also permits a lead agency to determine that a resource constitutes a historical resource even if the resource does not meet the foregoing criteria. Buildings and other structures may be found to be historical resources (along with archeological resources and tribal cultural resources, not analyzed in this section), and the San Francisco Planning Department (Planning Department) considers those resources that meet one of the definitions noted above to be historical resources for the purposes of CEQA review. Each of these categories of historical resources is discussed in this section.

This section relies substantially on a Historic Resource Evaluation (HRE) prepared for the proposed project, as well as the Planning Department's Historic Resource Evaluation Response (HRER).[37]

IV.A.2 Environmental Setting

There are three buildings on the project site. At 1601–1605 Market Street is the Civic Center Hotel, a five-story, steel-and-concrete-frame (with brick infill) residential hotel (built in 1915). At 1621 Market Street is the United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry (UA) Local 38 building, a two-story, reinforced-concrete assembly and office building (built in 1923 and remodeled in 1964). Finally, at 1629–1645 Market Street is the Lesser Brothers Building, a one-story, concrete commercial block at 1629–1645 Market Street (built in 1925–26). Each of these buildings is described in more detail below under "Historical Resources on the Project Site." The remainder of the project site is occupied by surface parking lots and a ventilation structure for the underground Bay Area Rapid Transit District (BART) tunnel.

[37] VerPlanck Historic Preservation Consulting, *Historic Resource Evaluation: 1601–05 to 1629–45 Market Street, San Francisco, CA*, March 8, 2017; and San Francisco Planning Department, *Historic Resource Evaluation Response: 1629 Market Street*, April 17, 2017.

Determining Historical Status

As stated in the above, a building or other structure is a historical resource under CEQA if it is listed in, or determined eligible for listing in, the California Register; listed in a local register of historical resources, such as *Planning Code* Article 10 and Article 11 (both described below); identified in a historical resources survey that meets state requirements; or is otherwise determined to have historical significance. The following subsection describes various historical resource survey frameworks.

California Register of Historical Resources

The California Register is an inventory of significant architectural, archeological, and historical resources in the State of California. It is administered by the California Office of Historic Preservation (OHP). Resources can be listed in the California Register through a number of methods. Properties listed on or eligible for listing in the National Register of Historic Places (National Register) are automatically listed in the California Register, as are all State Historical Landmarks designated after 1961 and certain others.[38] These resources are considered historical resources by the Planning Department for the purposes of CEQA. The evaluative criteria used by the California Register for determining eligibility closely parallel those developed by the National Park Service for the National Register, but include relevance to California history. In order for a property to be eligible for listing in the California Register, it must meet one or more of the following criteria:

- **Criterion 1 (Event):** Resources that are associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
- **Criterion 2 (Person):** Resources that are associated with the lives of persons important to local, California, or national history.
- **Criterion 3 (Design/Construction):** Resources that embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master, or possess high artistic values.
- **Criterion 4 (Information Potential):** Resources or sites that have yielded or have the potential to yield information important to the prehistory or history of the local area, California, or the nation.

A resource must also retain sufficient integrity to be eligible for listing. Integrity is the ability of a property to convey its historic significance, and is judged on seven aspects: location, design, setting, workmanship, materials, feeling, and association.

OHP maintains, in conjunction with nine regional information centers, the California Historical Resources Information System, which includes information on properties evaluated for California Register eligibility. Evaluated resources are assigned California Historical Resource Status Codes ranging from "1" to "7." Properties with a status code of "1" are listed in the California Register or National Register. Properties with a status code of "2" have been formally determined eligible for listing in the California Register or National Register. Properties with a status code of "3" or "4" appear to be eligible for listing in either register, while

[38] The National Register is the official federal list of buildings and sites of local, state, or national importance. Its eligibility criteria are substantially similar to those of the California Register (labeled A through D rather than 1 through 4). Because California Register listing or eligibility determines CEQA historical resource status, and because a property formally determined eligible for, or listed in, the National Register is automatically listed in the California Register, the National Register is not discussed further.

properties with a status code of "5" are typically of local importance. Status codes of "6" indicate that the property has been found ineligible for listing in any register and a status code of "7" indicates that the property has not yet been evaluated.

Two buildings on the project site—the Civic Center Hotel at 1601–1605 Market Street and the Lesser Brothers Building at 1629–1645 Market Street—have Status Codes of 3CS, meaning that they both appear to be individually eligible for listing in the California Register, based on their evaluation as part of the Market & Octavia Historic Context Statement and Historic Resource Survey (Market & Octavia Survey), described below. The UA Local 38 building at 1621 Market Street has a Status Code of 6Z, meaning that it is ineligible for listing in any register at the local, state, or national level.

San Francisco Landmarks and Locally Designated Properties

Article 10 Landmarks and Article 11 Building and Conservation Districts are considered historical resources by the San Francisco Planning Department for the purposes of CEQA. Article 11 applies only within the C-3 (Downtown) Use Districts—not inclusive of the project site—and is not discussed further.

Article 10 Landmarks

Planning Code Article 10 (Preservation of Historical, Architectural and Aesthetic Landmarks) provides for official designation of landmarks and historic districts throughout the city that have "a special character or special historical, architectural or aesthetic interest or value." Landmarks can be buildings, sites, or landscape features. Historic districts can be areas constituting a distinct section of the City. Designation as a landmark requires approval of the Board of Supervisors. Landmark status provides the greatest level of protection for historical resources in San Francisco; in general, alteration of a landmark requires approval by the Historic Preservation Commission of a Certificate of Appropriateness. There are no City landmarks on the project site, nor is the site in a landmark district. However, the site is adjacent, across both Market Street and Brady Street, to the Market Street Masonry Landmark (Historic) District (Article 10, Appendix M), a non-contiguous landmark district comprising seven buildings on Market Street between 12th and Valencia Streets and an eighth structure at Franklin and Fell Streets. This district is described below.

Other Surveys[39]

A number of previous historical resources surveys have been undertaken in San Francisco. Some of these surveys constitute local registers of historical resources, having been formally adopted by the Board of Supervisors and/or the Planning Commission. Buildings identified in these surveys as having historical significance are considered historical resources under CEQA.[40] Other surveys have not been formally adopted by the City, and therefore are not considered local registers of historical resources. Buildings identified as

[39] Much of the language describing the surveys is taken from Preservation Bulletin 11, "Historic Resource Surveys."
[40] Included in the list of designated historical resources are those properties identified in *Planning Code* Article 10 (City Landmarks) and Article 11 (historical resources in the C-3 [Downtown] zoning districts, including portions of the South of Market area formerly zoned C-3, generally bounded by Mission, Howard, Sixth, and 10th Streets, and subsequently designated as the South of Market Extended Preservation District).

historically significant in those surveys are considered potential historical resources, for which further consultation and review is required prior to a determination as to whether the building is a historical resource.[41]

Junior League of San Francisco Architectural Survey, 1968

Here Today: San Francisco's Architectural Heritage (*Here Today*) is one of San Francisco's first architectural surveys, undertaken by the Junior League of San Francisco and published in book form in 1968. Although the *Here Today* survey did not assign ratings, it did provide brief historical and biographical information about what the authors believed to be significant buildings. The findings of the survey were adopted by the Board of Supervisors on May 11, 1970 (Resolution No. 268-70), and resources listed in *Here Today* are therefore considered to be historical resources for purposes of CEQA review. None of the buildings on the project site is included in *Here Today*.

San Francisco Department of City Planning Architectural Survey, 1976

The 1976 Architectural Quality Survey is what is referred to in preservation parlance as a "reconnaissance" or "windshield" survey. The survey reviewed the entire city to identify and rate what was thought to be the top 10 percent of architecturally significant buildings and structures. Twelve separate aspects of the selected 10,000 buildings were evaluated on a scale of –2 (detrimental) to +5 (extraordinary), with a summary rating of 0 to 5 assigned to the building as a whole. Buildings rated with a summary rating of 3 or higher in the 1976 survey represent approximately the top two percent of San Francisco's buildings in terms of architectural significance. Summary ratings of 0 or 1 are generally interpreted to mean that the property has some contextual importance. Properties were assessed only for architectural merit; historical associations were not considered. Although the survey was adopted by the Board of Supervisors in 1978 (Resolution 78-31), the survey was not undertaken consistent with California Public Resources Code Section 5024.1(g). Inclusion in the 1976 survey, therefore, is an indication that the Planning Department has additional information on the building, but not that the building is a historical resource under CEQA. Further research is necessary to determine whether a property included in the 1976 survey qualifies as a historical resource. One of the three buildings—1621 Market Street—on the project site was evaluated in the 1976 survey. The surveyor evidently mistook the building, which is a 1964 remodel of a 1923 building, as a new building (field notes indicate, "Must watch for bias against new buildings"), giving it a summary rating of "2."

San Francisco Architectural Heritage Surveys, 1979

San Francisco Architectural Heritage (Heritage) is the City's oldest not-for-profit organization dedicated to increasing awareness and advocating for preservation of San Francisco's unique architectural heritage. Heritage has sponsored, or has been commissioned by the City to conduct, several historical resource inventories in San Francisco, including surveys for area plans in Downtown, the Van Ness Corridor, Civic Center, Chinatown, the Northeast Waterfront, and South of Market, as well as surveys in the Inner Richmond District and the Dogpatch neighborhood. The earliest and most influential of these surveys was the Downtown Survey. Completed in 1977–1978 for Heritage by Michael Corbett and published in 1979 as the book *Splendid Survivors*, this survey serves as the intellectual foundation for much of the historical discussion in the Downtown Plan. The methodology improved upon earlier surveys insomuch as it consists of both intensive fieldwork and thorough

[41] San Francisco Preservation Bulletin 16, "CEQA Review Procedures for Historic Resources." Available at http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=5340, accessed August 29, 2016.

archival research. Buildings were evaluated using the Kalman Methodology, a pioneering set of evaluative criteria based on both qualitative and quantitative factors. A team of outside reviewers analyzed the survey forms and assigned ratings to each of the pre-1945 buildings within the survey area. The ratings include "A" (highest importance), "B" (major importance), "C" (Contextual Importance), and "D" (minor or no importance). The Heritage surveys have not been formally adopted by the City, and thus a building listed by Heritage is not a historical resource under CEQA by virtue of Heritage listing alone; however, many Heritage-rated buildings have been otherwise determined to be historical resources. Heritage assigned the Civic Center Hotel a "C" rating and gave the UA Local 38 building a rating of "D." Heritage did not evaluate the Lesser Brothers Building.

Market & Octavia Context Statement and Historic Resource Survey, 2007

In support of the Market & Octavia Area Plan, the Planning Department contracted with consultants Page & Turnbull to survey the Plan area boundaries, including parts of Hayes Valley, the Mission, South of Market Area (SoMa), Civic Center, Upper Market, Duboce Triangle and Duboce Park, Lower Haight, Castro and the Western Addition. The Market & Octavia Survey encompassed the project site. A Historic Context Statement was prepared to document the history of the area and inform the survey findings. A total of 1,563 buildings were documented with California Department of Parks and Recreation (DPR) 523A forms,[42] with more detailed evaluation undertaken for 155 buildings—including two of the three buildings on the project site, at 1601 and 1629–1645 Market Street—and 736 buildings evaluated as part of a group or district. The Market & Octavia Survey identified both the Civic Center Hotel at 1601–1605 Market Street and the Lesser Brothers commercial building at 1629–1645 Market Street as historical resources; each was found to appear eligible for listing in the California Register under Criterion 3 (Design/Construction). The survey did not identify the third building on the project site, the UA Local 38 building at 1621 Market Street, as a historical resource, nor did it identify any historic districts on the project site. The context statement and survey findings were endorsed by the Landmarks Preservation Advisory Board on December 19, 2007, and were adopted by the Planning Commission on February 19, 2009.

Automotive Support Structures Survey, 2010

The Automotive Support Structures Survey focused on an approximately four-block-wide corridor along Van Ness Avenue from Mission Street to Broadway, and was undertaken "to determine the historic status of the remaining examples of an increasingly rare property type: buildings with an association with the automobile in San Francisco."[43] The survey evaluated a total of 112 properties, including three adjacent to the project site. Of the 112, 64 were found to appear eligible for the California Register, either individually or as part of a district, including two adjacent to the project site (discussed below). The survey and accompanying context statement were adopted by the Historic Preservation Commission on July 21, 2010.

[42] The DPR 523 series of forms is used for recording and evaluating historical resources and for nominating properties to the California Register of Historical Resources or as a state landmark. Form 523A, the Primary Record, is for recording the resource's name, location, basic attributes, age, and ownership. Form 523B, the Building, Structure, and Object Record, allows for compilation of more detail, including key features such as the resource's architectural style, architect, and construction history, as well as the resource's historic significance and the date or period thereof. Other forms in the DPR series are used to record historic districts, archeological resources, and other resources. (The state Office of Historic Preservation is located within the California Department of Parks and Recreation; hence, the acronym "DPR.")

[43] Historic Preservation Commission staff report, Case No. 2010.0483U: Automotive Support Structures Historic Survey and Context Statement, for meeting of July 21, 2010.

Buildings on the Project Site

Historic Context

The project site is located less than 400 feet west of the intersection of Market Street and Van Ness Avenue, where the city's primary east/west artery meets its principal north/south counterpart. The site is within an area known locally as the "Market Street Hub," or simply "The Hub," a name derived from the four streetcar lines that once converged on the area. The name may also have origin in the way the numbered streets of the South of Market Area pirouette around the intersection of Market Street and Van Ness Avenue, shifting from a northwesterly/southeasterly alignment to their dominant east/west direction in the Mission District, resulting in a large radius curve in Mission, Howard, Folsom, and Harrison Streets and an unusual arrangement of wedge-shaped blocks in the area between 11th, Market, and 13th Streets and Duboce Avenue.

Although the streets in The Hub were mapped as early as 1858, development of the area took another decade or so to occur. This was due in part because of the distance from The Hub to the Yerba Buena Cove, an area that developed earlier, and also because of physical obstacles, including creeks, marshes, and large sand dunes. Maps show few buildings in The Hub until the late 1860s/early 1870s. Development in the area accelerated following the 1860 opening of the Market Street Railroad Company, built by real estate speculator Thomas Hayes along Market Street to Hayes Street, and then westward to a tract of land that he owned in what is now Hayes Valley. By 1869, the U.S. Coast Survey map showed several buildings had been constructed on the project site, primarily on Market and 12th Streets. As early as 1889, a saloon was located at the southwest corner of 12th and Market Streets, on what is now the site of the Civic Center Hotel. Early development on the project block also included a stockyard, a wood and coal dealer, a junk merchant, a horse collar manufacturer, a marble works, and a wagon and blacksmith shop, as well as several residential buildings.

All buildings on the project block were destroyed in the 1906 earthquake and fire. By 1913, the block was substantially rebuilt, albeit with some temporary buildings that were erected quickly pending completion of plans for more permanent development. Most of the project site was occupied at this time by a wrecking and salvage company that engaged in salvage contracting and sold salvaged building materials—a business that grew out of "recycling" of building materials from earthquake-damaged but unburned buildings. A saloon and rooming house occupied the southwest corner of Market and 12th Streets. The rest of the block was occupied by residential buildings. The first permanent structure to be erected on the project site was the Civic Center Hotel at 1601–1605 Market Street.

Historical Resources on the Project Site

Civic Center Hotel (1601–1605 Market Street)

Description

The Civic Center Hotel is a five-story, steel- and concrete-frame, residential hotel clad in brick. The building, built in 1915, was designed by William H. Crim, Jr., a well-known San Francisco architect of the early 20th century, and built by Ildevert I. Dehail, a French immigrant turned real estate investor in Los Angeles, who later became a part-time resident of San Francisco. Extant buildings designed by Crim include several warehouses and factories in the South of Market neighborhood (1 South Park, now residential; and 400 and 599 Second

Street, both now offices); the former Second Church of Christ, Scientist, at 651 Dolores Street (now residential); and the former El Capitan Theater building at 2353 Mission Street, of which only the residential-over-retail portion remains, the auditorium having been demolished in 1924 and replaced by a parking lot, with the former lobby now a vehicle entrance. Extant buildings designed by the firm of Crim & Scott, in which Crim was a partner with Earl B. Scott from about 1906–1920, include an office building at 667 Mission Street; the Mission Savings Bank at 3068 16th Street; and the Buich Building—home of Tadich Grill—at 240 California Street.

The Civic Center Hotel has an L-shaped footprint consistent with the parcel on which it is located. The leg of the L defines the building's principal façade, on 12th Street, while the foot of the L sits on Stevenson Street. The top of the L comprises a narrow secondary façade, only 25 feet wide, facing Market Street, while the remainder of the building faces the interior of the project site. The 12th and Market Street façades are finished in pressed brick laid in an English bond pattern (the bricks in each row are turned 90 degrees from those in the next row). A sheet metal intermediate cornice separates the ground floor from the upper residential floors, while a cast stone belt course divides the fourth and fifth stories. Above the fifth floor is a sheet metal cornice composed of an egg-and-dart molding, a course of dentil molding, and an entablature featuring an embossed Greek key motif. A brick parapet sits atop the cornice, above the flat roof. Regularly spaced double-hung, one-over-one windows have a brick sill below and a cast stone lintel above, and feature the ogee lugs at the bottom of the upper sash.[44] The Stevenson Street and interior block facades are also brick, in common (or American) bond pattern (bricks in every sixth course are perpendicular to the façade), and the windows have brick sills but no lintels. On Stevenson Street, the intermediate cornice, belt course, and cornice/entablature turn the corner from 12th Street but do not continue for the entire length of the façade; simpler projecting brick courses replace the cast stone belt course and the upper cornice/entablature. The façades that open onto the interior of the block, generally facing to the west, have windows only within west- and north-facing light wells, with no cornices or belt courses, except for a brief return from Market Street, where the upper cornice, fifth-story belt course, and intermediate cornice above the ground floor all continue around the corner of the building. According to the HRE, these interior-facing façades are very plain in design "because it was expected that a building would eventually be built on the adjoining parcel. However, nothing substantial was ever built on this lot, meaning that this side of the Civic Center Hotel has always been visible from Market Street."[45]

At the ground floor, the building has storefronts on 12th Street, Market Street, and the eastern portion of Stevenson Street. The storefronts have been altered over time, as is common, and they were either boarded up or covered by metal security grates for a number of years before recently being uncovered as part of the building's current use as a Navigation Center. The 12th Street storefronts south of the main entrance now contain multi-light display windows above tiled bulkheads, and retain what may be the original divided-light transom windows above, although the glass may have been replaced. The Market Street storefronts, only recently uncovered after being boarded up for years, have new multi-light display windows and divided-light transom windows above, although a metal ventilation grate has replaced part of the transom glass and transom windows above the two doorways are either covered over or have been removed. Original storefront display windows have apparently been removed at all locations on both 12th and Market Streets. The north end of the 12th Street

[44] An ogee lug is a piece of wood, roughly triangular in shape but typically milled with an S- (ogee) curve, that was traditionally affixed to either side of the bottom of the top sash of a double hung window. The ogee lugs kept the window from closing all the way in the event of breakage of the sash cord, which was attached to a heavy weight inside the wall.

[45] VerPlanck Historic Preservation Consulting, *Historic Resource Evaluation: 1601–05 to 1629–45 Market Street, San Francisco, CA*, March 8, 2017

façade, where a bar was long located, has two rectangular windows and no display or transom windows. While shops, bars, restaurants, and offices historically occupied the storefronts, reportedly they have been vacant since the 1980s. There is a loading dock/service entrance containing a metal roll-up door, with a boarded-up transom above, located at the left side of the Stevenson Street façade. There are fire escapes on the 12th, Market, and Stevenson Street façades.

The main entrance to the Civic Center Hotel is in the southern half of the 12th Street façade, surrounded by porcelain-clad metal panels and covered by a sheet metal canopy; both the panels and the canopy were installed in the mid-1960s. Other pedestrian entrances exist on both 12th and Market Streets. A large neon blade sign with the hotel's name, projecting from the second through fourth floors of the Market Street façade, also likely dates from this same era. Various painted wall signs, some more faded than others, remain on the Stevenson Street and interior block façades, advertising the hotel and offering free parking, among others. **Figure IV.A-1, Civic Center Hotel (1601 Market Street)**, p. IV.A-9, depicts the Civic Center Hotel.

The HRE identifies the following as character-defining features of the Civic Center Hotel:

- Five-story height and massing and three street-facing elevations (Market, 12th, and Stevenson Streets);
- Pressed brick (Market and 12th Streets) and common brick (Stevenson Street) cladding;
- Cast stone and sheet metal ornament on the Market Street and 12th Street façades;
- Street-level storefronts (though not the storefront materials themselves);
- Fenestration pattern of regularly punched, double-hung wood windows with brick lug sills and cast stone lintels; and
- The neon blade sign on Market Street, which the HRE identifies as having likely acquired historic significance in its own right despite not being original to the building.

Integrity

According to the HRE, the Civic Center Hotel retains a "moderate to high degree" of integrity, and retains integrity in all seven aspects used in California Register evaluations. The most visible exterior changes include the reconfiguration and replacement of the original main entrance, as well as the two adjacent storefronts and canopy. The HRE found that the blade sign facing Market Street, added around the same time, has likely gained historic significance in its own right. The only other notable alterations include the alteration of the storefront windows and the conversion of one storefront on Stevenson Street into a loading dock.

Evaluation

As noted, the Market & Octavia Survey found that the Civic Center Hotel appears eligible for the California Register under Criterion 3 (Design/Construction). The HRE concurred, finding "the building appears individually eligible for listing in the California Register under Criterion 3 as a good and well-preserved example of a masonry residential hotel designed by a well-known San Francisco architect in the Classical Revival style." The building's period of significance is 1915. Although built during the post-1906 Earthquake Reconstruction Era, the HRE finds that because the Civic Center Hotel was constructed toward the end of that

Primary (12th Street) Façade and secondary (Market Street) facade, looking south from across Market Street

Interior - (west-) facing facades

1629 Market Street: Case No. 2015-005848ENV

SOURCE: VerPlanck Historic Preservation Consulting

Figure IV.A-1
Civic Center Hotel (1601 Market Street)

period, and because it was not the location of any known historic events, the building is not individually eligible under Criterion 1 (Events), nor is it individually eligible under Criterion 2 (Persons), because it has no known association with important individuals. The HRE does opine that the Civic Center Hotel could be eligible as a contributor to the locally listed Market Street Masonry Landmark District (discussed below), although the building is not currently identified as such.

The Planning Department's HRER concurs that the Civic Center Hotel is individually eligible for listing on the California Register under Criterion 3, with a period of significance of 1915.[46] Therefore, for purposes of this EIR, the Civic Center Hotel is a historical resource under CEQA.

Lesser Brothers Building (1629–1645 Market Street)

Description

The Lesser Brothers Building is a single-story, reinforced-concrete commercial building that has a partial mezzanine. It was built in 1925–26 by brothers Samuel and Moses Lesser, who had four meat markets, in San Francisco, Oakland, and Berkeley, and also operated a real estate investment firm. The building was designed by the architectural firm of Hyman & Appleton, with 11 individual storefronts, of which five pairs of stores originally shared five recessed entrance bays, while the 11th storefront had its own entry. Samuel Hyman & Abraham Appleton formed a partnership in 1920 and would design, among extant buildings, the art deco remodeling and expansion of the Crown Zellerbach Building at 343 Sansome Street, Visitation Valley School, and Sinai Memorial Chapel at Geary Boulevard and Divisadero Street, as well as, with Arthur Brown, Jr., the Jewish Community Center (demolished). The firm's earliest known project was the main building of the Jewish Home of San Francisco, scheduled for demolition in 2017 as part of an expansion project.

The Lesser Brothers Building is a classic "taxpayer block"—a single-story commercial building on a growing commercial corridor built to provide an income stream until property values had increased to warrant the construction of a larger building. Since the building's construction, the storefronts have been remodeled multiple times such that only one recessed bay remains; the remaining storefronts have been pushed out to the street wall. Some of the storefronts have been combined, such that there are only five today. The area above the storefronts is unchanged from the original, and consists of a band of wood-frame transom windows, a stucco-clad frieze consisting of a Romanesque Revival arcuated motif (i.e., a series of arches are at the bottom of the frieze), and a pent-roofed parapet clad in red clay tiles.[47] Solid cement plaster piers extend from the frieze to the sidewalk between each of the six structural bays (including a half bay at the western end). The only pair of storefronts that retain an original recessed entry is at 1639–1641 Market Street, and the entry also retains its original tiled bulkheads below the display windows, extruded aluminum-frame display windows, and glazed wood-panel doors.

The other two visible exterior façades (south and west) are utilitarian, consisting of board-formed concrete. The east façade is not visible, as it is adjacent to the building at 1621 Market Street. The Brady Street (west) façade includes a display window at the north end that continues the Market Street storefront, a single, small other window and a plain concrete parapet. This façade is painted with a colorful mural, which is unsigned and undated. The mural was painted between 2012 and 2015. The rear façade faces a parking lot that is on the same parcel as the building, and each of the original storefronts had a pedestrian doorway and a window in the

[46] San Francisco Planning Department, *Historic Resource Evaluation Response: 1629 Market Street*, April 17, 2017.
[47] A pent roof is a single-sloped roof; here, it refers to the tile-clad portion of the building cornice attached to the parapet.

ground floor, although most of these openings have been infilled or boarded up. The mezzanine level retains 11 original large metal sash windows.

A variety of retail, restaurant, service, wholesale, office, and light manufacturing uses have occupied the Lesser Brothers Building through the years. One of the most noteworthy occupants, for a two-year period in the 1970s, was the Black Self-Help Moving and Storage Company, a business venture of Nation of Islam and a local businessman. The moving company employed the core group of the infamous Zebra Killers, who terrorized San Francisco for several months in 1973 and 1974, ultimately killing 15 people. These five men "had been indoctrinated with hatred of the 'white devil' at meetings held on the mezzanine of 1645 Market Street … [and] launched their reign of terror from the space, which served as their headquarters."[48] One victim, an unidentified homeless man, was tortured and murdered on the mezzanine level at 1645 Market Street.[49] **Figure IV.A-2, Lesser Bros. Building (1629–1645 Market** Street), p. IV.A-12, depicts the Lesser Brothers Building.

The HRE identifies the following as character-defining features of the Lesser Brothers Building:

- Single-story height and massing;
- Regular pattern of storefront openings (though not the storefront materials themselves) divided by piers and capped by wood-frame transoms;
- Stucco exterior cladding with simple cast cement ornament, including the Romanesque arcuated motif frieze and molded cornice; and
- Tile-clad pent-roofed parapet.

Integrity

According to the HRE, the Lesser Brothers Building retains a "moderate to high degree" of integrity, and retains integrity in all seven aspects used in California Register evaluations. The most visible changes apparent are the removal of all but one of the recessed entrance bays. However, the storefronts retain their original proportions of glass to bulkhead (the wall below the display windows) and the building's original Romanesque Revival detailing is intact.

Evaluation

As noted, the Market & Octavia Survey found that the Lesser Brothers Building appears eligible for the California Register under Criterion 3 (Design/Construction). The HRE concurred, finding, "the building appears individually eligible for listing in the California Register under Criterion 3 as a good and well-preserved example of a masonry commercial block designed by a moderately well-known San Francisco architect in a functional style with Romanesque Revival detailing"; the building's period of significance is 1926. The HRE found that the building is a "rare, surviving example of a low-scale 'taxpayer' block on Market Street." The HRE also found that the Lesser Brothers Building may be individually eligible under Criterion 1 (Events), for its association with the Black Self-Help Moving Company and the Zebra Killers. The building is not individually eligible under Criterion 2 (Persons), because it has no known association with important individuals.

[48] VerPlanck Historic Preservation Consulting, *Historic Resource Evaluation: 1601–05 to 1629–45 Market Street, San Francisco, CA*, March 8, 2017, p. 52.
[49] David Talbot, *Season of the Witch* (New York: Free Press, 2012).

Primary (Market Street) facade and west (Brady Street) façade

Market Street façade, detail of transom windows and frieze

Rear facade

1629 Market Street: Case No. 2015-005848ENV

SOURCE: VerPlanck Historic Preservation Consulting

Figure IV.A-2

Lesser Bros. Building (1629-1645 Market Street)

The Planning Department's HRER concurs that the UA Local 38 building is not eligible for listing on the California Register.[50] Therefore, for purposes of this EIR, 1621 Market Street is not a historical resource under CEQA.

Nearby Historical Resources

Market Street Masonry Landmark District

As noted previously, the project site is not within a historic district. However, the project site is adjacent, across both Market Street and Brady Street, to the Market Street Masonry Landmark (formerly Historic) District (*Planning Code* Article 10, Appendix M), a non-contiguous landmark district adopted by the Board of Supervisors in 2013 comprising eight buildings on Market Street between 12th and Valencia Streets and on Franklin Street at Fell Street. The eight buildings in the district were designed by a number of highly regarded master architects, including G. Albert Lansburgh (1582 Market Street, across Market and Page Streets from the project site), George Applegarth (1649–1655 Market Street at Brady Street, across Brady from the project site), Conrad A. Meussdorffer (1693 Market Street), August Nordin (150 Franklin Street), and William H. Crim (1666 Market Street), who was architect of the Civic Center Hotel. Other buildings in the district include 1657 Market Street, 1670 Market Street, and 1687 Market Street. The buildings were constructed between 1911 and 1925 in popular revival styles of the early 20th-century such as Classical Revival, Colonial Revival, and Venetian Gothic Revival. Each building displays a formal three-part arrangement consisting of a base (often with a commercial storefront), main portion or column (generally, residential floors), and decorative top with either a projecting cornice or decorative parapet.

The Planning Department's HRER concurs that the Lesser Brothers Building is individually eligible for listing on the California Register under Criterion 3, with a period of significance of 1925.[51] Therefore, for purposes of this EIR, the Lesser Brothers Building is a historical resource under CEQA. The HRER does not draw any conclusion with respect to eligibility under Criterion 1.

Non-Historical Resource on the Project Site

UA Local 38 Building, 1621 Market Street

As noted previously, the UA Local 38 building has a California Register Status Code of 6Z, meaning that it is not a historical resource; this status code was assigned as part of the Market & Octavia Survey. The 1621 Market Street building was constructed in 1923 as a lodge for the Loyal Order of Moose, a fraternal and service organization. The two-story-plus-basement reinforced concrete building, with a double-height auditorium in the rear, was designed by the local firm O'Brien Brothers, Architects. Following a fire in 1947, the Moose Lodge relocated, first to the Mission District and later to Daly City. (At present, the closest Moose Lodge is in Pacifica.) UA Local 38 leased the building from the Moose Lodge for use as its union hall and, in 1959, purchased the building. Soon thereafter, the UA Local 38 undertook an extensive remodeling program, removing the original Classical Revival façade and replacing it with a pre-cast concrete façade that exists today. As a result, the original design no longer exists and the HRE found that building retains little integrity—only the aspect of location.

[50] San Francisco Planning Department, *Historic Resource Evaluation Response: 1629 Market Street*, April 17, 2017.
[51] Ibid. The year 1925 refers to the date the building was designed and construction was begun; it was completed in 1926.

The UA Local 38 building is clad in pre-cast concrete panels, with anodized aluminum windows and doors at the ground floor, surmounted by louvers or transoms. The second story also has aluminum windows, and a narrow balustrade (railing) projects slightly forward of the windows. The façade terminates in a plain frieze containing large metal letters reading, "Plumbers & Steamfitters U.A. Local 38," a narrow projecting cornice, and a metal-capped parapet. The remaining façades of this building are plain board-formed concrete. The rear wall is covered by a large signed mural dated 2013.

The HRE concurred with the Market & Octavia Survey finding of ineligibility for the California Register due to the loss of integrity of the original design, and further determined that the 1960s renovations have not gained historical significance in their own right, meaning that the building is not eligible for the California under Criterion 3 (Design/Construction). The HRE acknowledged that the building was strongly associated with Joe Mazzola, the UA Local 38 business manager from 1954 until his death in 1989. In the 1950s, Mazzola played a key role in negotiating groundbreaking benefits for UA Local 38 members, including paid vacations, health and welfare benefits, and pensions. Mazzola was also influential in local and national Democratic Party politics. However, because most of Mazzola's groundbreaking achievements for Local 38 took place in the 1950s and early 1960s, before the building was remodeled, the HRE concluded that 1621 Market Street is not eligible for the California Register under Criterion (Persons). Finally, the building is not eligible under Criterion 1 (Events), as it does not appear that it is associated with any important historical post-1964 (post-remodeling) events. **Figure IV.A-3, UA Local 38 Union Hall (1621 Market Street)**, p. IV.A-15, depicts the UA Local 38 building.

As they were constructed following the 1906 earthquake and fire, the buildings in the district followed new building codes, and they influenced the City's transition from a city of wood and brick, to one of brick veneer, concrete, and stucco. However, while the buildings are in the same neighborhood, they are not spatially linked; instead they are individual elements that "relate to each other as a group because of the period in which they were constructed, their high-style design, and fire-proof masonry construction. All of the buildings are well-preserved examples and retain character-defining features, such as elaborate metal cornices, pattern brickwork, historic storefronts with glass transom lights, bronze plate glass window frames and decorative bases."[52]

Although constructed in the same era and in a similar style as the eight buildings in the district, and by one of the same architects, the Civic Center Hotel is not included in the Market Street Masonry Landmark District.

Path of Gold Light Standards

The Path of Gold Light Standards, City Landmark No. 200, extend along Market Street from its east end to just beyond Castro Street. The 327 street lights consist of an elaborately decorated cast iron base and hollow cast iron pole (supported by an interior solid steel pole), atop which is installed a sculpted tripartite structure that supports a top-most lamp globe at the center, with two additional globes, each atop a pendant, supported by a cross-member perpendicular to Market Street. The streetlights are painted a dark blue-gray color accented with gold paint on the thin vertical metal supports that hold each glass globe in place. The bases and poles were originally installed from the Ferry Building to Seventh Street to support electrical wires that powered the streetcars, with the installation jointly undertaken by private streetcar operator United Railroads, downtown

[52] *Planning Code* Article 10, Appendix M, Section 5, Statement of Significance.

Primary (Market Street) facade

View to southwest from across Market Street

1629 Market Street: Case No. 2015-005848ENV

SOURCE: VerPlanck Historic Preservation Consulting

Figure IV.A-3

U.A. Local 38 Union Hall (1621 Market Street)

property owners and merchants, and Pacific Gas and Electric Co. The installation was extended to Valencia Street, and the light fixtures were installed in the 1920s. All of the original Path of Gold Light Standards were replaced in the 1970s, in connection with construction of the BART system, with replicas cast from molds taken from the original standards. Some 100 of the original standards were reused to extend the Path of Gold to Castro Street in the 1980s.

The Path of Gold Light Standards were designated a City Landmark in 1991, with the landmark designation applying only to "each light fixture itself including the ornamental poles and lamp globes";[53] no surrounding sidewalk or other site is included in the landmark designation. The landmark case report for the Path of Gold Light Standards identifies the standards as "a significant legacy from the City Beautiful Movement, which gave us the Civic Center." The case report also details the light standards' association with a number of noted San Francisco artisans. Well-known architect Willis Polk designed the original base and pole ensemble for United Roads. Other contributors included a number of men associated with the 1915 Panama-Pacific International Exposition, such as sculptor Arthur Putnam, whose design, "Winning of the West," is cast on the base of each light standard. Sculptor Leo Lentelli, who designed the top portion of each light standard along with engineer Walter D'Arcy Ryan, who designed the lighting scheme for the Panama-Pacific International Exposition, also contributed. Other key associations included turn-of-the-20th century political boss Abe Ruef, United Railways president Patrick Calhoun, and the streetcar line's chief counsel, Tirey Ford, all of whom were implicated in a bribery scandal surrounding the City's granting of a streetcar franchise to United Railroads, one condition of which was the installation of "highly ornamental" trolley and light poles along Market and Sutter Streets. Finally, to maintain the light fixtures on the massive Path of Gold Light Standards—each one stands 33 feet, or essentially two stories, in height—PG&E invented a predecessor of the modern "cherry picker" lift.

There are five Path of Gold Light Standards along the south sidewalk of Market Street adjacent to the project site: one in front of the Civic Center Hotel, one in front of a surface parking lot, one in front of the UA Local 38 building, and two in front of the Lesser Brothers Building.

Other Historical Resources

The closest City Landmark buildings to the project site include the former Juvenile Court and Detention Center at 150 Otis Street (now Veterans Commons supportive housing), Landmark No. 248, about two and one half blocks southwest of the project site; and the Rube L. Goldberg Building at 186–194 Gough Street, Landmark No. 268, about two and one half blocks northwest of the project site.

The nearest other California Register-listed or eligible historic districts include the Civic Center Landmark District (*Planning Code* Article 10, Appendix J; also listed on the National Register), approximately two blocks north of the project site; the Hayes Valley Residential District, two blocks northwest; the Jessie-McCoppin-Stevenson District, two blocks southwest; and the Western SoMa Light Industrial and Residential District, about one and one half blocks southeast.

Other historical resources in the immediate project vicinity include two buildings on 12th Street south of Stevenson Street that were determined, as part of the Automotive Support Structures Survey, to appear

[53] Ordinance 266-91, approved by the Board of Supervisors June 24, 1991, and signed by the Mayor June 26, 1991.

individually eligible for the California Register, and thus are considered historical resources for purposes of CEQA. These two buildings are briefly described here.[54]

The building at 42 12th Street is a single-story, brick automotive repair building in the Classical Revival style, constructed in 1919 and used nearly continuously for auto repair uses since then. In composition, the building's 12th Street façade consists of two nearly symmetrical garage bays, above each of which is a divided-light transom. Above the transoms is an entablature consisting of a pair of plain horizontal bands, courses of molding above and below a plain frieze that contains signage, and a plain cornice surmounted by a low parapet that includes vertically projecting blocks at either end. Painted brick piers support each end of the entablature, with a third pier in the center, dividing the two bays. The building underwent a seismic retrofit, as was required for unreinforced masonry structures, in 1999. The building appears largely original, save for the roll-up doors that enclose each bay and door-and-window assemblies within each bay. The rear façade, which is visible from the project site, is covered in a mural that appears to be unsigned. The 42 12th Street building was designed by architect Joseph L. Stewart, whose work is known to include apartment buildings, houses in St. Francis Wood, and automobile garages and repair shops.

Immediately south of 42 12th Street is a three-story, brick building at 56–70 12th Street. This building, designed by architects Miller and Colmesnil, also in the Classical Revival style, was constructed in 1912.[55] Although it originally housed vehicle showrooms (Rambler, Jeffrey, and Nash cars and Stevens-Duryea and Garford trucks), the building was used for industrial and light industrial and retail uses beginning in 1918, and more recently was devoted to office uses. The ground floor features eight bays divided by pilasters, each topped by a shield, with non-historic metal windows and doors and solid, stucco-covered infill in the northernmost and southernmost bays. A decorative frieze divides the ground floor from the upper two stories, which are clad in stucco scored to resemble masonry and divided into four bays, each with a pair of non-historic double-hung windows inside an arched opening. The façade terminates in a parapet topped by a thin stringcourse; the parapet rises to a shallow peak over the two middle bays, and itself is topped by four stepped pyramids. The north and south façades are plain brick. The rear portion of the building extends as a single-story element back to Colusa Place, south of the project site, and the northern façade of this element, which is covered with a mural, abuts the project site. The rear façade is brick in a common bond pattern and includes large rectangular garage openings at its north and south ends (each with a non-historic metal roll-up door), along with six arched window openings, one of which has subsequently been converted to a door. Architectural detail is limited to brick arches in the window openings and a simple cornice of projecting brick that is slightly elevated at the center of the rear façade and features two raised square projections. Although the stucco cladding was apparently added in 1920, after the building's automotive associations ended, it otherwise appears original, save for the replacement windows and ground-floor infill. The building was seismically retrofitted in 1998.

[54] A third structure, 40 12th Street, was identified as a contributor to a potential South Van Ness Art Deco-Moderne Historic District as part of the Market & Octavia Historic Resource Survey. However, upon the recommendation of the Landmarks Preservation Advisory Board (predecessor to the Historic Preservation Commission), the Planning Commission determined in February 2009 that this district was not California Register-eligible. Accordingly, 40 12th Street is not considered a historical resource under CEQA.

[55] Although he partnered with George T. de Colmesnil intermittently from 1906 to 1913, James R. Miller is better known for his later partnership with Timothy Pflueger; together, Miller and Pflueger designed the Pacific Telephone and Telegraph Building at 140 New Montgomery Street, 450 Sutter Street, and the Pacific Stock Exchange, among other well-known structures. Miller also designed two other automotive garage buildings, at 1745 Clay Street and 2401 Bush Street.

IV.A.3 Regulatory Framework

As described above in the Introduction to this section, CEQA defines a "historical resource" as a resource that is listed in, or determined eligible for listing in, the California Register. A resource is presumed a historical resource, absent evidence to the contrary, if it is identified as significant in a local register of historical resources or identified in a historical resources survey meeting state requirements. Finally, a lead agency may determine that a resource is a historical resource based on other information. California Public Resources Code Section 5024.1(c) states that resources are listed in (or determined eligible for listing in) the California Register if they meet one of four criteria and also retain sufficient integrity. The four criteria are as follows: 1 – Event (resource is associated with important historical events); 2 – Person (resource is associated with the lives of historically important persons); 3 – Architecture (resource embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic value); and 4 – Informational Potential (resource has yielded, or has the potential to yield, information important to prehistory or history). Criteria for the National Register of Historic Places specified in the *Code of Federal Regulations* (CFR) are similar to the California Register, but are lettered A–D (36 CFR Part 60.4). Integrity entails the survival of characteristics or historic fabric that existed during the resource's period of significance; that is, the time it gained its historical importance. Integrity encompasses seven aspects: location, design, materials, workmanship, setting, feeling, and association (Public Resources Code Section 5024.1(b); 36 CFR Part 60.4).

Public Resources Code Section 5024.1(g) sets forth guidelines for historical resource surveys, including, among other things, preparation of the survey according to OHP procedures and listing the results in the State Historic Resources Inventory. In general, project-specific historical resource surveys performed as part of CEQA review in San Francisco will meet these guidelines and, therefore, resources identified as having California Historical Resource Status Codes 1 through 5 (denoting properties listed in, determined eligible for, or that appear eligible for listing in the California Register; or properties recognized as historically significant by a local government) on such surveys will normally be determined to be historical resources for CEQA purposes[56]. San Francisco contains approximately 175 properties listed in the National Register of Historic Places (National Register), well over a thousand buildings and structures listed in or eligible for listing in the California Register, approximately 50 California State Historical Landmarks, approximately 266 locally designated historical landmarks, and 14 locally designated historic districts.

San Francisco General Plan

The Market & Octavia Area Plan, an area plan within the *San Francisco General Plan*, contains the following objective and supporting policies that address historic preservation:

- **Objective 3.2:** Promote the preservation of notable historic landmarks, individual historic buildings, and features that help to provide continuity with the past.
- **Policy 3.2.1:** Preserve landmark and other buildings of historic value as invaluable neighborhood assets.
- **Policy 3.2.2:** Encourage rehabilitation and adaptive reuse of historic buildings and resources.

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

- **Policy 3.2.4:** Protect and preserve groupings of cultural resources that have integrity, convey a period of significance, and are given recognition as groupings through the creation of historic or conservation districts.
- **Policy 3.2.5:** Preserve resources in identified historic districts.
- **Policy 3.2.7:** Ensure that changes in the built environment respect the historic character and cultural heritage of the area, and that resource sustainability is supported.
- **Policy 3.2.8:** Encourage new building design that respects the character of nearby older development.
- **Policy 3.2.10:** Apply the "Secretary of the Interior's Standards for the Treatment of Historic Properties" for all projects that affect individually designated buildings at the local, state, or national level.
- **Policy 3.2.12:** Preserve the cultural and socioeconomic diversity of the plan area through preservation of historic resources.
- **Policy 3.2.13:** To maintain the City's supply of affordable housing, historic rehabilitation projects may need to accommodate other considerations in determining the level of restoration.

Other *General Plan* objectives and policies applicable to historic preservation include the following from the Urban Design Element:

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

Finally, as set forth in Section B.4 of Chapter III, *Plans and Policies*, of this EIR, the *Accountable Planning Initiative* (Proposition M of 1986) added eight priority policies to the *Planning Code* and to the preamble to the *General Plan* that "shall be the basis upon which inconsistencies in the General Plan are resolved" (*Planning Code* Section 101.1). Priority policy 7 is "that landmarks and historic buildings be preserved."

As noted in Section III.B.4, demolition of the majority of the Lesser Brothers Building could be inconsistent with the priority policy 7 (preservation of landmarks and historic buildings). This demolition could also conflict with Market & Octavia Area Plan and Urban Design Element objectives and policies that promote historic preservation. However, the Planning Commission, in its consideration of the proposed project's *General Plan* consistency, will evaluate all relevant *General Plan* objectives and policies, including, for example, those that promote neighborhood-serving retail uses, less parking, less auto use in commuting, and the provision of affordable housing. The Planning Commission will evaluate whether the project would be, on balance, consistent with the *General Plan*, including the eight priority policies added by the *Accountable Planning Initiative*. Inconsistency with a particular *General Plan* policy does not indicate that a project is inconsistent with the *General Plan* as a whole, nor does such a policy conflict, in and of itself, represent a significant adverse effect on the environment, although it may serve as an indicator that such effect could arise. The remainder of this section evaluates the physical environmental effects of the project with respect to historic architectural resources.

IV.A.4 Impacts and Mitigation Measures

Significance Criteria

For purposes of this EIR, the proposed project would have a significant impact with respect to historical architectural resources if it would:

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

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

(A) Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

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

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

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

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

and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

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

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

Fragile structures, especially older masonry structures, can be damaged by vibration. For construction-generated vibration impacts, the Federal Transit Administration (FTA) has developed criteria for judging the significance of vibration produced by construction equipment. The FTA establishes the following standards to prevent architectural damage: (1) 0.5 in/sec peak particle velocity (PPV) for reinforced concrete, steel, or timber (no plaster) construction and (2) 0.2 in/sec PPV for fragile buildings (i.e., non-engineered timber or masonry structures).[57] These criteria are used as the thresholds of significance for vibration impacts in this EIR.[58]

Approach to Analysis

The analysis considers direct and indirect impacts on known historical architectural resources, based on the definitions set forth in CEQA Guidelines Section 15064.5. Potential impacts on historical architectural resources are assessed by determining whether the proposed project would affect any such resources that have been defined as historical resources for the purposes of CEQA. Once a resource has been identified as significant, it must be determined whether the project would cause a "substantial adverse change" that materially impairs the significance of the resource. Material impairment occurs when there is demolition or alteration of the resource's physical characteristics that convey its historical significance and that justify its inclusion in the California Register or other applicable listing. Mitigation for effects on historical architectural resources may involve

[57] Federal Transit Administration, Office of Planning and Environment, Transit Noise and Vibration Impact Assessment, May 2006. Available at http://www.hmmh.com/cmsdocuments/FTA_cover_sec01.pdf, accessed on August 29, 2016; see Table 12-3, p. 12–13. Although part of a larger manual that primarily assesses noise and vibration from transit operations, the FTA construction vibration standards are generally relevant to any construction project using heavy equipment.
[58] The peak particle velocity (PPV)—the maximum instantaneous peak of the vibration signal in inches per second (in/sec)—is most frequently used to describe vibration impacts to buildings.

avoidance of the resource, revision of a proposed project to minimize the effect, or, where avoidance or minimization is not feasible, documentation of the resource. As noted above, documentation may not reduce effects on a historical architectural resource to a less-than-significant level.

Impact Evaluation

As described in Chapter II, *Project Description*, the proposed project would rehabilitate the Civic Center Hotel, demolish a majority of the Lesser Brothers Building, and entirely demolish the UA Local 38 building. As the UA Local 38 building is not a historical resource, its demolition would result in a less-than-significant impact to cultural resources. The remainder of this impact analysis discusses effects on the two historical resources on the project site—the Civic Center Hotel and the Lesser Brothers Building—as well as on adjacent historical resources.

Direct Impacts

Lesser Brothers Building

Impact CR-1: The proposed project would cause a substantial adverse change in the significance of the Lesser Brothers Building, a historical resource as defined in CEQA Guidelines Section 15064.5(b). (Significant and Unavoidable with Mitigation)

Design-Related Impacts

The proposed project calls for the retention of the entire 140-foot-long Market Street façade of the Lesser Brothers Building, which is the building's primary façade and the only façade with ornamentation, as well as partial retention of the two sidewalls. As part of the proposed project, the sponsor would repair and/or renovate, as necessary, character-defining features of the primary façade, including the stucco-finished piers separating the storefronts and the stucco-covered wall surfaces above, the frieze, and the cornice and pent-roofed parapet.

The retained façades, which are 23 feet in height, would be incorporated into a new 85-foot-tall, 10-story residential-over-retail/restaurant structure (Building A, see Figure II-3, Proposed Site Plan, in Chapter II, *Project Description*). The first residential story above the retained Market Street façade of the Lesser Brothers Building would be set back 10 feet from the retained façade, while at the remaining five residential floors, the base façade of the new construction would maintain this 10-foot setback and irregularly spaced bays would protrude approximately seven feet from the façade. Metal fin fenestration would protrude an additional 10 inches beyond the bays. The combination of the setback, the irregularly-spaced, multi-story rectangular bay windows, and the new material palette would contrast with the historic façade of the Lesser Brothers Building, clearly demarcating new from old. At the same time, the rectangular bays would align with the storefronts in the retained façade below, creating a geometric relationship between the old and new construction. The new construction would be clad in aluminum-frame windows and glass-fiber reinforced concrete or cementitious panels, with the bays clad in glass.

In addition to the primary Market Street façade, the project would retain approximately 80 percent (48 of 60 feet) of the west (Brady Street) façade, which contains a mural, as well as 40 percent (24 of 60 feet) of the east façade,

which currently abuts 1621 Market Street.[59] The partially retained east façade would be newly visible with demolition of 1621 Market Street and development of a pedestrian walkway between Buildings A and B. On the partially retained west façade, the mural would be removed to add storefront windows. The entire 140-foot-long south (rear) façade would be demolished, along with the interior of the building and the roof. On the Market Street façade, the stucco-finished wall surfaces, including the piers separating the storefronts, the frieze, and the cornice/pent-roofed parapet would be retained, preserved, and repaired as necessary, as would the wood-frame transom windows above the storefronts. The existing storefronts, which have been largely altered, would be replaced with compatible new storefronts. In addition to the 10-foot front setback, the new construction would be set back approximately eight feet from the eastern façade of the Lesser Brothers Building and approximately three feet from the western façade.

The HRE evaluated the project's proposed treatment of the Lesser Brothers Building for consistency with the Secretary's Standards and concluded that the proposed project would not comply with Standards 1, 2, 9, or 10, because the proposed project would effectively demolish the Lesser Brothers Building, including approximately 45 percent of the exterior walls, and would add new construction to the remaining façades that would be incompatible with the scale, size, proportion, and massing of the historical resource. Moreover, the new construction could not realistically be removed in the future while retaining the essential form and integrity of the historic building.

The HRE found that the proposed project would comply with the following: Standard 3, in that it would not add conjectural features; Standard 4, in that the building does not include any added features that have acquired their own historic importance; Standard 5, in that the building's exterior character-defining features, finishes, and materials, including the stucco cladding and cast cement piers, arcuated motif frieze, molded cornice, and red clay tile pent-roofed parapet on the primary façade, would be retained; Standard 6, in that there is little serious deterioration of character-defining features that requires replacement; and Standard 7, in that harsh cleaning and restoration methods would be avoided. The project would comply with Standard 8 (archeological resources) through implementation of Mitigation Measure M-CR-6, Archeological Testing, in the Initial Study (Appendix A of this EIR).

Because the proposed project would comply with some, but not all, of the Secretary's Standards with respect to the Lesser Brothers Building, it is necessary to determine whether the proposed project would result in "physical demolition, destruction, relocation, or alteration" of the building such that its historical significance is "materially impaired." As noted previously, material impairment occurs when there is demolition or alteration of the resource's physical characteristics that convey its historical significance and that justify its inclusion in the California Register or other applicable listing. As proposed, the project would both remove more than 25 percent of the building's exterior walls from their function as either external or internal walls and more than 75 percent of the building's existing internal structural framework while retaining the principal Market Street façade and portions of the east and west (Brady Street façades). Although, as noted, the building's exterior character-defining features—the stucco cladding and cast cement piers, arcuate motif frieze, molded cornice, and red clay tile pent-roofed parapet on the primary façade—would be retained, one important character-defining feature

[59] Dimensions from proposed project plans dated March 28, 2017, for Lesser Brothers Building included in Strada Brady LLC, "1629 Market Street: Historic Preservation Approach," March 2017; included in staff report for April 5, 2017, Historic Preservation Commission Architectural Review Committee meeting. Available at: http://commissions.sfplanning.org/hpcpackets/2015-005848ENV_Alternatives.pdf.

would be eliminated: the building's single-story height and massing. The building's height and massing are paramount to conveying its significance, given that the building is recognized in the HRE as a "rare, surviving example of a low-scale 'taxpayer' block on Market Street." While the Market Street façade and portions of the west (Brady Street) façade would remain visible as a single-story element, and a portion of the newly exposed east façade would likewise be visible, the seven-story vertical addition would rise more than 60 feet above the retained portion of the 23-foot-tall Lesser Brothers Building and would be set back only 10 feet from the Market Street façade and lesser distances on either side. Effectively, therefore, the building's single-story height and massing would no longer be extant.

The changes to the Lesser Brothers Building would alter the building's historic massing, spatial relationships, and proportions, causing it to lose integrity of design, setting, or feeling, which are three of the seven characteristics of integrity that are analyzed to determine a resource's eligibility for the California Register. A fourth aspect of integrity, materials, would be partially lost, because while the Market Street façade would retain its stucco cladding and cast cement piers, arcuated motif frieze, molded cornice, and red clay tile pent-roofed parapet, much of the remainder of the building would be demolished. A fifth aspect of integrity—association—relates to the property's link between important historic events or persons. As the Lesser Brothers Building is not recognized for its association with such events or persons, this aspect of integrity is less relevant than the others. Accordingly, implementation of the proposed project would result in the Lesser Brothers Building retaining only its integrity of location and workmanship—the latter for the character-defining features that would remain. As a result, although the façade would retain much of its architectural detail, the building would no longer represent a "rare, surviving example of a low-scale 'taxpayer' block on Market Street."[60]

In light of the foregoing, this EIR determines that the proposed project would materially impair the historical significance of the Lesser Brothers Building. Accordingly, the proposed project would result in a substantial adverse change to the Lesser Brothers Building and the impact would be significant and unavoidable with respect to this structure. Although **Mitigation Measures M-CR-1a, HABS Documentation, and M-CR-1b, Interpretive Display**, identified below, could reduce the severity of the impact to the Lesser Brothers Building that would result from implementation of the project design, the impact would be ***significant and unavoidable with mitigation***.

Mitigation Measures

Mitigation Measure M-CR-1a – HABS Documentation. To document the Lesser Brothers Building more thoroughly than has been done to date, prior to the start of demolition activities, the project sponsor shall cause to be prepared documentation in accordance with the Historic American Buildings Survey (HABS), a program of the National Park Service. The photographs and accompanying HABS Historical Report shall be maintained on-site, as well as in the appropriate repositories, including but not limited to, the San Francisco Planning Department, San Francisco Architectural Heritage, the San Francisco Public Library, and the Northwest Information Center of the California Historical Resources Information System. The contents of the report shall include an architectural description, historical context, and statement of significance, per HABS reporting standards. The documentation shall be undertaken by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate), as set forth by the *Secretary of the Interior's Professional Qualification Standards* (36 Code of Federal Regulations, Part 61). HABS documentation shall provide the appropriate

[60] VerPlanck Historic Preservation Consulting, *Historic Resource Evaluation: 1601–05 to 1629–45 Market Street, San Francisco, CA*, March 8, 2017; p. 61.

level of visual documentation and written narrative based on the importance of the resource (types of visual documentation typically range from producing a sketch plan to developing measured drawings and view camera (4x5) black and white photographs). The appropriate level of HABS documentation and written narrative shall be determined by the Planning Department's Preservation staff. The report shall be reviewed by the Planning Department's Preservation staff for completeness. In certain instances, Department Preservation staff may request HABS-level photography, a historical report, and/or measured architectural drawings of the existing building(s).

Mitigation Measure M-CR-1b – Interpretive Display. Prior to the start of demolition, the project sponsor shall work with Planning Department Preservation staff and another qualified professional to design a publicly accessible interpretive display that would memorialize the Lesser Brothers Building, which would be effectively demolished under the proposed project. The contents of the interpretative display shall be approved by Planning Department Preservation staff, and may include the history of development of the project site, including the non-historic Local 38 union hall building and the Civic Center Hotel (and possibly buildings demolished previously), and/or other relevant information. This display could take the form of a kiosk, plaque, or other display method containing panels of text, historic photographs, excerpts of oral histories, and maps. The development of the interpretive display should be overseen by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate) set forth by the *Secretary of the Interior's Professional Qualification Standards* (36 Code of Federal Regulations, Part 61). An outline of the format, location and content of the interpretive display shall be reviewed and approved by Planning Department Preservation staff prior to issuance of a demolition permit or site permit. The format, location and content of the interpretive display must be finalized prior to issuance of the Architectural and Mechanical, Electrical, and Plumbing (MEP) Addendum for the Building A project component.

Construction-Related Impacts

Construction activity can generate vibration that can potentially cause structural damage to adjacent and nearby buildings. As no pile driving is proposed, heavy equipment used in construction would generate vibration levels up to 0.089 in/sec PPV at a distance of 25 feet, for the largest typical construction equipment such as a large bulldozer.[61] This is well below the 0.2 inch per second (0.2 PPV) standard—the standard established by the FTA for potential damage to non-engineered timber and masonry buildings. However, because demolition and construction activity would occur on and immediately adjacent to the Lesser Brothers Building, such activity could damage the character-defining features of the portion of the building proposed to be retained, including the Market Street façade. Implementation of **Mitigation Measures M-CR-1c, Protect On-Site Historical Resources from Construction Activities**, and **M-CR-1d, Construction Monitoring Program for On-Site Historical Resources**, would reduce potential construction-related impacts to these character-defining features. Nevertheless, as stated above, because the proposed project would effectively demolish this building, the impact on the Lesser Brothers Building would be ***significant and unavoidable with mitigation***.

Mitigation Measures

Mitigation Measure M-CR-1c – Protect On-Site Historical Resources from Construction Activities. The project sponsor shall incorporate into construction contracts a requirement that the construction contractor(s) use feasible means to avoid damage to on-site historical resources (portion of the Lesser

[61] FTA, Transit Noise and Vibration Impact Assessment, May 2006 (see footnote 57, p. IV-.A-22).

Brothers Building to be retained and Civic Center Hotel). Such methods may include staging of equipment and materials as far as feasible from historic buildings to avoid direct damage; using techniques in demolition, excavation, shoring, and construction that create the minimum feasible vibration (such as using concrete saws instead of jackhammers or hoe-rams to open excavation trenches, the use of non-vibratory rollers, and hand excavation); maintaining a buffer zone when possible between heavy equipment and historic resource(s); and enclosing construction scaffolding to avoid damage from falling objects or debris. These construction specifications shall be submitted to the Planning Department along with the Demolition and Site Permit Applications. To promote proper coordination of construction logistic activities intended to avoid damage to both adjacent and on-site historical resources, the methods proposed in M-CR-1c should be coordinated with those proposed in M-CR-4a, Protect Adjacent Historical Resources from Construction Activities.

Mitigation Measure M-CR-1d – Vibration Monitoring Program for On-Site Historical Resources. The project sponsor shall retain the services of a qualified structural engineer and preservation architect that meet the Secretary of the Interior's Historic Preservation Professional Qualification Standards to conduct a Pre-Construction Assessment of the on-site historical resources (portion of the Lesser Brothers Building to be retained and Civic Center Hotel) prior to any ground-disturbing activity. The Pre-Construction Assessment shall be prepared to establish a baseline, and shall contain written and/or photographic descriptions of the existing condition of the visible exteriors of the adjacent buildings. The structural engineer and/or preservation architect shall also develop and the project sponsor shall prepare and implement a Vibration Management and Monitoring Plan to protect the on-site historical resources against damage caused by vibration or differential settlement caused by vibration during project construction activities. In this plan, the maximum vibration level not to be exceeded at each building shall be determined by the structural engineer and/or preservation architect for the project. The Vibration Management and Monitoring Plan shall document the criteria used in establishing the maximum vibration level for the project. The Vibration Management and Monitoring Plan shall include vibration monitoring and regular periodic inspections at the project site by the structural engineer and/or historic preservation consultant throughout the duration of the major structural project activities to ensure that vibration levels do not exceed the established standard. The Pre-Construction Assessment and Vibration Management and Monitoring Plan shall be submitted to the Planning Department Preservation staff prior to issuance of any construction permits. Should damage to either of the on-site historical resources be observed, construction shall be halted and alternative techniques put in practice, to the extent feasible, and/or repairs shall be completed as part of project construction. A final report on the vibration monitoring of the portion of the Lesser Brothers Building to be retained shall be submitted to Planning Department Preservation staff prior to the issuance of a Certificate of Occupancy for the addition to that building, and a final report on the vibration monitoring of the Civic Center Hotel shall be submitted to Planning Department Preservation staff prior to the issuance of a Certificate of Occupancy for that building following its rehabilitation.

Significance after Mitigation: Implementation of these mitigation measures would assist in reducing project impacts, but would not reduce impacts to a less-than-significant level because only avoidance of substantial adverse changes to the Lesser Brothers Building, a historical resource under CEQA, would reduce impacts to less-than-significant levels. Therefore, the impact on historic architectural resources would be ***significant and unavoidable with mitigation***.

Civic Center Hotel

Impact CR-2: The proposed project could cause a substantial adverse change in the significance of the Civic Center Hotel, a historical resource as defined in CEQA Guidelines Section 15064.5(b). (Less than Significant with Mitigation)

Design-Related Impacts

Rehabilitation of Civic Center Hotel

The proposed project calls for the retention and rehabilitation of the Civic Center Hotel, including the street-facing Market, 12th, and Stevenson Street façades. The rehabilitation would retain the following character-defining features: the building's five-story height and massing and three brick-clad street-facing elevations on Market, 12th, and Stevenson Street; the cast stone and sheet metal ornament on the Market and 12th Street façades; the street-level storefronts (although the materials and design of the storefronts themselves would be altered); the regular pattern of double-hung windows; and the neon blade sign would be retained, but may be relocated on the building and the lettering and lighting type and efficiency may be altered. Most of the building's property line façade facing the interior of the block would also be retained and rehabilitated, although a new emergency stair and elevator shaft would be added and would protrude from the west-facing light well, and new openings would be made in the walls to provide access to the stair and elevator. The building's remaining ground-floor storefronts along Market Street, the eastern third of Stevenson Street, and three-fourths of 12th Street—which have been altered over time—would be replaced with new storefronts and new transom windows that are compatible with the original design, as shown in historic renderings and photographs. However, the new storefronts would not necessarily match the original storefronts in terms of materials or design. In addition, new storefronts (compatible with the original) would be added where they have been removed over time, including adjacent to and north of the primary building entrance on 12th Street. The porcelain-coated metal panels installed adjacent to the entrance in the 1960s would be removed, and a new canopy installed above the main entrance. The façades of the upper four residential floors on all three street frontages would be cleaned and restored to their original historic appearance, including the brick cladding, sheet metal belt course between the first and second floor levels, cast stone intermediate cornice between the fourth and fifth floors, and sheet metal cornice near the top of the building. Upper-story windows would be replaced with new windows in compliance with the Secretary's Standards. Similar to the existing windows, the new windows would be double-hung, one-over-one sash windows. The new windows would be wood, or another material that matches wood in regard to texture and appearance, and would retain the existing rail and stile profile, as well as the ogee lug detail at the bottom of the upper sash, to the extent such windows are commercially available. As noted above, the neon blade sign mounted on the northeast corner of the building would be retained, repaired, and reused, although the sign may be relocated on the Market Street façade and the lettering and lighting type and efficiency may be altered.

The HRE evaluated the project's proposed treatment of the Civic Center Hotel for consistency with the Secretary's Standards. The HRE concluded that the proposed project would comply with all 10 Standards with respect to the Civic Center Hotel because the project would:

- Retain the historic residential use with ground-floor retail (Standard 1);
- Retain the building's exterior character-defining features, including its three street-facing façades and nearly all of the fourth facade, as well as the building's ornament, fenestration pattern, and the neon

blade sign; in addition, the previously altered storefronts would be replaced with compatible new storefronts (Standard 2);

- Not add conjectural features that create a false sense of historical development; rather, the missing or altered storefronts and main entrance would be rehabilitated using contemporary materials and features designed to be compatible with the well-documented original design (Standard 3);
- Retain the 1960s-era neon blade sign that has likely acquired historic significance in its own right, although the sign may be relocated on the Market Street façade and the lettering and lighting type and efficiency altered (Standard 4);
- Retain the building's exterior character-defining features, finishes, and materials, including its pressed brick wall cladding on Market and 12th Streets and common brick cladding on Stevenson Street, the cast stone and sheet metal cornice and belt courses, and window trim, and the neon blade sign (Standard 5);
- Repair rather than replace deteriorated exterior features as much as possible, with the exception of upper-story wood sash windows, which would be replaced in compliance with the Secretary's Standards with new double-hung windows that meet current energy standards (Standard 6);
- Minimize harsh chemical or physical treatment in cleaning and paint and corrosion removal and repainting (Standard 7);
- Avoid adverse effects on archeological resources (Standard 8; see Mitigation Measure M-CR-6, Archeological Testing, in the Initial Study, Appendix A of this EIR);
- Not make any physical additions to the building other than a new exit stair and elevator shaft, and would make alterations (e.g., to the storefronts) that would be "be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment" (Standard 9); adjacent new construction of the new UA Local 38 union hall would obscure the west façade of the Civic Center Hotel, but this façade is unadorned and was always intended to be concealed behind adjacent development; and
- Would make additions (the exit stair and elevator shaft) that could be reversed in the future without adversely affecting the form and integrity of the building, while adjacent new construction, were it to be removed in the future, would leave the Civic Center Hotel essentially intact as it is today (Standard 10).

The HRER concurred with the HRE's findings that the proposed rehabilitation of the Civic Center Hotel would comply with the Secretary's Standards. Because the proposed project's alterations to the Civic Center Hotel would comply with the Secretary's Standards, and because the project would not result in a substantial adverse change to the Civic Center Hotel through demolition, relocation, or major alteration of the building, the Civic Center Hotel would retain its historic integrity with respect to design, materials, and workmanship, and therefore the design-related impact with respect to rehabilitation of the Civic Center Hotel would be ***less than significant*** and no mitigation measures are required.

Mitigation: None required.

Adjacent New Construction

As described in the Project Description, the proposed project would demolish the existing UA Local 38 building and construct a new four-story, 58-foot-tall, union hall building that would be located between the rehabilitated

Civic Center Hotel and a new 10-story, 85-foot-tall residential building to the west on Market Street (Building B). The new UA Local 38 building would be about three feet taller than the Civic Center Hotel. The new building would be constructed on what is currently a surface parking lot, and thus would newly obscure the western, interior-facing façades of the Civic Center Hotel. As noted in the Setting, these façades have no character-defining features or substantial architectural ornamentation save the return where the Market Street façade's upper cornice, fifth-story belt course, and intermediate cornice above the ground floor all continue around the corner of the building, because it was assumed that subsequent development would occur adjacent to the hotel. While the obstruction of these façades would change existing views of the Civic Center Hotel, this would not represent an adverse change, inasmuch as these façades were never designed for or intended for display.

Although the specific design details are not yet finalized, the new UA Local 38 Building is proposed to be a four-story structure with a façade of glass and patterned cementitious or concrete panel. The building would have a double-height ground floor that includes a private assembly space and a building entrance on Market Street. Adjacent to the Civic Center Hotel, the building would have an enclosed fire stair and emergency exit set back approximately three feet, which provides a separation between the Civic Center Hotel and UA Local 38 Building massing. The UA Local 38 Building's vertically oriented fenestration and bays would be complementary to the Market Street façade of the Civic Center Hotel. The new UA Local 38 building would respect the height of the Civic Center Hotel and would be set back from Market Street approximately five feet at the east end of its Market Street façade to allow for retention of the return on the west façade of the Civic Center Hotel, where the Market Street façade's upper cornice, fifth-story belt course, and intermediate cornice above the ground floor all continue around the corner of the building. In addition, the new UA Local 38 building would serve as a visual buffer, 92 feet in width, between the Civic Center Hotel and the taller (85-foot) new construction of the project's Building B, thereby substantially shielding any potential indirect effects of Building B on the Civic Center Hotel.

With implementation of the proposed project, the Civic Center Hotel would retain integrity of location, as the building would remain at its historic site. Although new construction in the form of the new UA Local 38 building would infill an existing parking lot and obscure views of the western façades of the Civic Center Hotel, as described above, the new construction would be complementary to the Civic Center Hotel and the blockage of views of the building's western façades would not adversely affect the resource. Additionally, the Civic Center Hotel's western façades are considered secondary to its 12th and Market Street façades. Thus, the Civic Center Hotel's integrity of setting and feeling would not be substantially diminished. As described above in the evaluation of rehabilitation of the Civic Center Hotel, all character-defining features of the building would be retained, thus retaining integrity of design, materials, and workmanship. As with the Lesser Brothers Building, integrity of association is less relevant than the other aspects given that the Civic Center Hotel is not recognized for its association with such events or persons.

Given that the integrity of the Civic Center Hotel would be retained with implementation of the proposed project's rehabilitation of the building and adjacent new construction, the project would not materially impair the historical significance of this resource and thus would not result in a substantial adverse change to the Civic Center Hotel. Therefore, the impact of locating new buildings adjacent to the Civic Center Hotel would be ***less than significant***, and no mitigation is required.

Mitigation: None required.

Construction-Related Impacts

As noted above, construction activity can generate vibration that can potentially cause structural damage to adjacent and nearby buildings. Construction equipment would generate vibration levels up to 0.089 in/sec PPV at a distance of 25 feet, which is below the threshold for potential damage; however, because demolition and construction activity associated with rehabilitation would occur within and immediately adjacent to the Civic Center Hotel, such activity could damage the character-defining features of the Civic Center Hotel. Implementation of **Mitigation Measures M-CR-1c, Protect On-Site Historical Resources from Construction Activities**, and **M-CR-1d, Construction Monitoring Program for On-Site Historical Resources**, would reduce potential construction-related impacts to the Civic Center Hotel to a ***less-than-significant*** level.

Mitigation Measures

Implement **Mitigation Measures M-CR-1c, Protect On-Site Historical Resources from Construction Activities**, and **M-CR-1d, Construction Monitoring Program for On-Site Historical Resources**, above.

Significance after Mitigation: Implementation of **Mitigation Measures M-CR-1c, Protect On-Site Historical Resources from Construction Activities** and **M-CR-1d, Construction Monitoring Program for On-Site Historical Resources** would reduce construction-related impacts to on-site historical resources to a ***less-than-significant*** level.

Path of Gold Light Standards

Impact CR-3: The proposed project would not cause a substantial adverse change in the significance of the Path of Gold Light Standards, a historical resource as defined in CEQA Guidelines Section 15064.5(b). (Less than Significant)

No construction activity would occur on the proposed project's Market Street sidewalk where five Path of Gold Light Standards are located. Demolition of the UA Local 38 building, while it would reach the property line and the south edge of the Market Street sidewalk, would be nearly 10 feet away from the nearest light standard, as the Path of Gold Light Standards are near the curb. Moreover, the project site would be secured by construction fencing, as is required of all demolition and construction projects. The construction contractor would be responsible for ensuring that demolition and construction activities at the project site would not damage City property, including the Path of Gold Light Standards. Accordingly, construction-related effects on the Path of Gold Light Standards would be ***less than significant***, and no mitigation is required.

Mitigation: None required.

Adjacent Historical Resources

Impact CR-4: Construction-related activities associated with the proposed project could cause a substantial adverse change in the significance of adjacent historical resources as defined in CEQA Guidelines Section 15064.5(b). (Less than Significant with Mitigation)

As noted, construction activity can generate vibration that can potentially cause structural damage to adjacent and nearby buildings. Construction equipment would generate vibration levels of up to 0.089 in/sec PPV at a distance of 25 feet, which is below the threshold for potential damage. However, because construction activity would occur immediately adjacent to historical resources at 42 12th Street and 56–70 12th Street, construction vibration could adversely affect these resources. This would be a significant impact. Implementation of **Mitigation Measures M-CR-4a, Protect Adjacent Historical Resources from Construction Activities**, and **M-CR-4b, Construction Monitoring Program for adjacent Historical Resources**, would reduce potential construction impacts to the historic architectural resources at 42 12th Street and 56–70 12th Street to a ***less-than-significant*** level.

Typically, groundborne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration, further reducing any potential impact. Moreover, no other historical resources are closer to the project site than approximately 40 feet (the distance across Brady Street). Therefore, as no pile-driving is proposed, construction-generated vibration effects on other nearby historical resources, the closest of which is 1649-1655 Market Street, across Brady Street from the project site, would be ***less than significant***.

Mitigation Measures

Mitigation Measure M-CR-4a – Protect Adjacent Historical Resources from Construction Activities. The project sponsor shall incorporate into construction contracts a requirement that the construction contractor(s) use feasible means to avoid damage to adjacent historical resources at 42 12th Street and 56–70 12th Street. Such methods may include staging of equipment and materials as far as feasible from historic buildings to direct damage; using techniques in demolition, excavation, shoring, and construction that create the minimum feasible vibration (such as using concrete saws instead of jackhammers or hoe-rams to open excavation trenches, the use of non-vibratory rollers, and hand excavation); maintaining a buffer zone when possible between heavy equipment and historic resource(s); and enclosing construction scaffolding to avoid damage from falling objects or debris. These construction specifications shall be submitted to the Planning Department along with the Demolition and Site Permit Applications. To promote proper coordination of construction logistic activities intended to avoid damage to both adjacent and on-site historical resources, the methods proposed in M-CR-4a should be coordinated with those proposed in M-CR-1c, Protect On-Site Historical Resources from Construction Activities.

Mitigation Measure M-CR-4b – Vibration Monitoring Program for Adjacent Historical Resources. The project sponsor shall retain the services of a qualified structural engineer and preservation architect that meet the Secretary of the Interior's Historic Preservation Professional Qualification Standards to conduct a Pre-Construction Assessment of the adjacent historical resources at 42 12th Street and 56–70 12th Street. Prior to any ground-disturbing activity, the Pre-Construction Assessment shall be prepared to establish a baseline, and shall contain written and/or photographic descriptions of the existing condition of the visible exteriors of the adjacent buildings and in interior locations upon permission of the owners of the adjacent properties. The Pre-Condition Assessment shall determine

specific locations to be monitored, and include annotated drawings of the buildings to locate accessible digital photo locations and location of survey markers and/or other monitoring devices (e.g., to measure vibrations). The Pre-Construction Assessment shall be submitted to the Planning Department along with the Site Demolition and/or Permit Applications.

The structural engineer and/or preservation architect shall develop and the project sponsor shall prepare and implement a Vibration Management and Monitoring Plan to protect the buildings at 42 12th Street and 56–70 12th Street against damage caused by vibration or differential settlement caused by vibration during project construction activities. In this plan, the maximum vibration level not to be exceeded at each building shall be 0.2 inch/second, or a different level determined by the site-specific assessment made by the structural engineer and/or preservation architect for the project. The Vibration Management and Monitoring Plan should document the criteria used in establishing the maximum vibration level for the project. The Vibration Management and Monitoring Plan shall include continuous vibration monitoring throughout the duration of the major structural project activities to ensure that vibration levels do not exceed the established standard. The Vibration Management and Monitoring Plan shall be submitted to the Planning Department Preservation staff prior to issuance of any construction permits.

Should vibration levels be observed in excess of the standard, or if damage to either of the buildings at 42 12th Street and 56–70 12th Street is observed, construction shall be halted and alternative techniques put in practice, to the extent feasible. The structural engineer and/or historic preservation consultant shall conduct regular periodic inspections of digital photographs, survey markers, and/or other monitoring devices during ground-disturbing activity at project site. The buildings shall be protected to prevent further damage and remediated to pre-construction conditions as shown in the Pre-Construction Assessment with the consent of the building owner. Any remedial repairs shall not require building upgrades to comply with current *San Francisco Building Code* standards. A final report on the vibration monitoring shall be submitted to Planning Department Preservation staff prior to the issuance of a Certificate of Occupancy for Building D.

Significance after Mitigation: With implementation of **Mitigation Measure M-CR-4a, Protect Adjacent Historical Resources from Construction Activities**, and **Mitigation Measure M-CR-4b, Construction Monitoring Program for Adjacent Historical Resources**, construction-related impacts on adjacent historical resources would be ***less than significant***.

Indirect Impacts

Impact CR-5: The proposed project would not result in a substantial adverse change in the significance of an adjacent historical resource as defined in CEQA Guidelines Section 15064.5(b). (Less than Significant)

The proposed project would be constructed proximate to several other off-site buildings that are historical resources and/or contributors to historic districts, as described in the "Setting." Most notably the Market Street Masonry Landmark District, a noncontiguous district of eight structures, includes buildings across Market Street and across Brady Street from the project site. However, inasmuch as the Market Street Masonry Landmark District is made up of individual buildings that are architecturally related but spatially separated from one another, visual continuity of the buildings and uniformity with neighboring buildings are not factors in determining the significance of the district. Therefore, construction of the proposed project would not adversely

affect the Market Street Masonry Landmark District. The proposed project also would not adversely affect nearby City landmarks such as the former Juvenile Court and Detention Center at 150 Otis Street or the Rube L. Goldberg Building at 186–194 Gough Street, or nearby historic districts, such as the Civic Center Landmark District, the Hayes Valley Residential District, or the Western SoMa Light Industrial and Residential District, about one and one half blocks southeast, because the project site is too far from these resources. Additionally, the relatively modest maximum height (85 feet) for any building proposed for the project would preclude it from being visibly intrusive from any of these landmarks or districts. With respect to the immediately adjacent historical resources at 42 12th Street and 56–70 12th Street, each of these buildings is recognized for its association with the automotive industry, and not for its location or proximity to other such resources. Therefore, adjacent new construction would not substantially affect the historic integrity of these resources. Accordingly, the proposed project's indirect effects on historic architectural resources in the vicinity would be ***less than significant***.

Mitigation: None required.

Cumulative Impacts

Impact C-CR-1: The proposed project, in combination with past, present, and reasonably foreseeable projects in the area, would not result in a significant cumulative impact on historic architectural resources. (Less than Significant)

As described above, the Lesser Brothers Building at 1629–1645 Market Street appears eligible for listing in the California Register under Criterion 3 (Design/Construction) for its architectural merit as a "good and well-preserved example of a masonry commercial block designed by a moderately well-known San Francisco architect in a functional style with Romanesque Revival detailing … [and] a rare, surviving example of a low-scale 'taxpayer' block on Market Street." As shown on Figure IV-1, Cumulative Projects within 0.25 Mile of the Project Site, in Chapter IV, *Environmental Setting, Impacts, and Mitigation Measures*, approximately 22 cumulative projects are located within a 0.25-mile radius of the project site. Two of these cumulative projects would demolish buildings that have been determined to be historic architectural resources under CEQA; of these two, one—the under-construction project at 1546–1564 Market Street (Case No. 2012.0877E; Final EIR certified June 25, 2016)—has resulted in the demolition of a so-called "taxpayer block," or a single-story commercial building often developed to cover carrying costs while a land owner waited for property values to increase sufficiently to justify a larger, more expensive building. In addition to the 1546–1564 Market Street "taxpayer block," that project has demolished an automotive repair shop building at 55 Oak Street. The other project that would demolish a historical resource is 1500 Mission Street (Case No. 2014-000362ENV; Final EIR certified March 23, 2017. The historical resource that would be demolished at 1500 Mission Street is architecturally significant for its Streamline Modern design features.

Only the now-demolished "taxpayer block" at 1546–1564 Market Street shared substantial design features with the Lesser Brothers Building that would be demolished as part of the 1629 Market Street Mixed-Use Project. Although less common along Market Street, single-story commercial buildings, or "taxpayer blocks," remain relatively widespread on many of the City's more outlying commercial corridors, many of which developed as "streetcar suburbs" in the early 20th century. Single-story commercial buildings are a familiar sight, for example,

on Clement Street in the Inner and Outer Richmond district; on Irving and Taraval Streets in the Sunset and Parkside districts; along Mission Street, particularly in the Outer Mission and Excelsior districts; on Haight Street in both the Lower and Upper Haight; on Fillmore and Divisadero Streets in both Pacific Heights and the Western Addition; on 24th Street in Noe Valley; on Ocean Avenue in the Ingleside district; and even on Polk Street, which is within the greater downtown. Because of San Francisco's relatively high density and the constrained land supply, where such "taxpayer blocks" exist, they are generally intermixed with multi-story buildings that have ground-floor retail storefronts with residential units above.

Moreover, there is no established link between "taxpayer blocks" other than their economic function as part of urban and suburban expansion in the early 20th century. No historic district has been established under which "taxpayer blocks" have been recognized as historically or architecturally important. And, despite the intention that they serve as temporary development pending a more lucrative opportunity, many "taxpayer blocks" remain extant nearly 100 years later. As such, the demolition of two "taxpayer blocks" on Market Street between Van Ness/South Van Ness Avenues and Gough Street—the Lesser Brothers Building at 1629–1645 Market Street and the already demolished 1546–1564 Market Street building—would not contribute to a significant cumulative impact to historic architectural resources from the standpoint of the loss of important design typologies.

As for architects, the former 1546–1564 Market Street building was designed by Meyers and Ward. These architects, like Hyman and Appleton, who designed the Lesser Brothers Building, were members of a moderately well-known San Francisco architecture firm; other buildings to their credit include the Wells Fargo Building at 71–85 Second Street (1902; rebuilt 1907), the Goldenberg-Bowen Building at 250–254 Sutter Street (1909), and the Methodist Book Concern at 83 McAllister Street. Neither of the Market Street "taxpayer blocks" would be considered among either architectural firm's preeminent designs; therefore, the demolition of the two buildings would not contribute to a significant cumulative impact to historic architectural resources from the standpoint of loss of the works of important architects. Therefore, the proposed project, in combination with past, present, and reasonably foreseeable projects, would result in a ***less-than-significant*** cumulative impact on historic architectural resources.

Mitigation: None required.

IV.B Transportation and Circulation

IV.B.1 Introduction

This section summarizes and incorporates by reference the results of the Transportation Impact Study (TIS) prepared by the transportation consultant for the proposed project in accordance with the San Francisco Planning Department's (Planning Department) *2002 Transportation Impact Analysis Guidelines for Environmental Review* (*SF Guidelines 2002*).[62] The transportation analysis examines project impacts on vehicle miles traveled (VMT), traffic hazards, transit, pedestrians, bicycles, loading, and emergency vehicle access, as well as the transportation-related impacts of construction activities. All of these transportation subtopics are considered in the discussions of existing conditions; existing plus project; and year 2040 cumulative conditions. This section also includes a parking demand analysis, presented for informational purposes in this EIR.

IV.B.2 Environmental Setting

The transportation study area is generally two blocks north of the project site, to Fell Street; two blocks east of the project site, to 10th Street; two blocks south of the project site, to Howard Street; and two blocks west of the project site, to Octavia Street.

Roadway Network

Regional Access

The following regional highway transportation facilities link San Francisco with other parts of the Bay Area, as well as Northern and Southern California: Interstate 80 (I-80), United States Highway 101 (U.S. 101), and Interstate 280 (I-280). The project site is accessible by local streets with connections to and from these regional freeways.

Interstate 80 (I-80) and **U.S. Highway 101 (U.S. 101)** provide the primary regional access to the project area. U.S. 101 serves San Francisco and the Peninsula/South Bay, and extends north via the Golden Gate Bridge to the North Bay. Van Ness Avenue serves as U.S. 101 between Market Street and Lombard Street, and South Van Ness Avenue serves as U.S. 101 between Market Street and the Central Freeway (at 13th Street). I-80 connects San Francisco to the East Bay and points east via the San Francisco-Oakland Bay Bridge. U.S. 101 and I-80 merge south of the project site. The closest access to U.S. 101 from the project site is via the ramps at Market Street and Octavia Boulevard, and at South Van Ness Avenue and 13th/Division Street. The closest access to the project site from U.S. 101 is via the ramps at Market Street and Octavia Boulevard, and Mission Street and Duboce/13th Streets.

Interstate 280 (I-280) provides regional access from the South of Market area to southern San Francisco, the Peninsula and the South Bay. I-280 has an interchange with U.S. 101 approximately three miles south of the project area. The closest access to I-280 from the project site, and to the project site from I-280, is provided via the ramps at the intersection of Sixth/Brannan Streets.

[62] Fehr & Peers, *1629 Market Street Transportation Impact Study, Case No. 2015-005848ENV*, March 2017.

Local Access

South of Market Street streets that run in the northwest/southeast direction are generally considered north/south streets, whereas streets that run in the southwest/northeast direction are generally considered east/west streets. The grid offers multiple route options for getting from place to place, with numerous one-way streets and with multiple travel lanes. A number of north/south streets serve as access routes to and from the regional highway network (e.g., Ninth and 10th Streets, and Van Ness Avenue). The *San Francisco General Plan* (*General Plan*) contains definitions and regulatory requirements for a variety of roadway classifications that make up the city's street network, and designation of streets.[63] Within the transportation study area, Mission Street is identified as a Major Arterial. Market and Mission Streets are identified as Transit Preferential Streets and as part of the Citywide Pedestrian Network. Detailed descriptions are provided below for the streets adjacent to the project site: Market Street, Colton Street, Brady Street, and 12th Street.

Market Street bisects downtown San Francisco, running east/west between The Embarcadero and Grand View Avenue. Market Street is a two-way, four-lane roadway with center-running transit-only lanes between Gough and Third Streets. Market Street is classified in the *General Plan* as a Transit Conflict Street between The Embarcadero and Gough Street. Between The Embarcadero and 17th Street, it is classified as a Primary Transit Preferential Street (Transit Oriented Street), a Citywide Pedestrian Network Street, and a Neighborhood Commercial Pedestrian Street. It is part of the Congestion Management Program (CMP) Network. Market Street is a designated bicycle route with either Class II or Class III bicycle facilities in both directions (varies by location). The majority of Muni bus routes operate along some portion of Market Street. The Embarcadero, Montgomery, Powell, and Civic Center Bay Area Rapid Transit (BART) stations are accessible along Market Street; Civic Center is the closest BART station to the study area. Market Street sidewalk widths within the study area meet the *San Francisco Better Streets Plan* (*Better Streets Plan*) recommended width. Private vehicles are restricted from turning onto Market Street and are forced to turn off of Market Street at several intersections between Third and Eighth Streets.[64]

Colton Street is an east/west alleyway that runs between Colusa Place and Gough Street. Travel along Colton Street runs in both directions between Colusa Place and Brady Street and runs one-way westbound between Brady Street and Gough Street. Parking is permitted on the south side of the street between Colusa Place and

[63] City roadway designations include (listed in the order of potential vehicle capacity) Freeways, Major Arterials, Transit Conflict Streets, Secondary Arterials, Recreational Streets, Collector Streets, and Local Streets. Each of these roadways has a different potential capacity for mixed-flow traffic and for changes that might alter traffic patterns on the given roadway. The *General Plan* also identifies certain Transit Preferential Streets from among the city's various roadways, each of which is identified as a Primary Transit Street—Transit Oriented, Primary Transit Street—Transit Important, or Secondary Transit Street. The Pedestrian Network is a classification of streets throughout the City used to identify streets developed to be primarily oriented to pedestrian use, and includes Citywide Pedestrian Network Streets and Neighborhood Pedestrian Streets. City and County of San Francisco, *San Francisco General Plan*, 2007 Transportation Element. Available at http://www.sf-planning.org/ftp/General_Plan/I4_Transportation.htm.

[64] In the summer and fall of 2015, the San Francisco Municipal Transportation Agency (SFMTA) implemented turn restrictions and transit-only lane extensions on Market Street between Third and Eighth Streets as part of the Safer Market Street Project (with the exception that turn restrictions from northbound Fifth Street onto eastbound Market Street, and from southbound Ellis Street onto westbound Market Street will be implemented following completion of the Central Subway project work in the area). The Safer Market Street Project will help achieve the City's adopted Vision Zero policy, which aims to eliminate all traffic-related fatalities by 2024. On Market Street, prior to implementation of Safer Market Street, most collisions occurred at midblock locations and were caused by vehicles proceeding straight through on Market Street, rather than turning movements at intersections. Available at https://www.sfmta.com/projects-planning/projects/safer-market-street, accessed August 22, 2016.

Brady Street but is not permitted between Brady Street and Gough Street. There are no existing bicycle or Muni facilities on Colton Street. The *General Plan* identifies Colton Street as a Recreational Street.

Brady Street runs north/south for one block between Otis Street and Market Street. Brady Street runs in both directions between Otis Street and Stevenson Street, and only northbound travel is permitted between Stevenson Street and Market Street. Parking is permitted along one side of Brady Street, on the west side of the street between Otis Street and Colton Street, and on the east side of the street between Colton Street and Market Street. There are no existing bicycle or Muni facilities on Brady Street within the study area. The *General Plan* identifies Brady Street as a Recreational Street.

12th Street is a two-way north/south roadway that runs between Market Street and Harrison Street, with a one-block gap between South Van Ness Avenue and Otis Street. Within the study area, parking is permitted on both sides of 12th Street, and there is one travel lane in each direction. There are no existing bicycle or Muni facilities on 12th Street within the study area. The *General Plan* identifies 12th Street as a Recreational Street.

Stevenson Street is an east/west alleyway that the project site bifurcates into two disconnected segments. It starts at 12th Street, dead-ends west of 12th Street, and continues from Brady Street to another dead-end east of Gough Street. Two-way travel is permitted on the segments west of 12th Street and west of Gough Street, but only eastbound travel is permitted between Brady Street and Gough Street. On the street segments west of 12th Street and between Brady Street and Gough Street, parking is permitted on one side of the Stevenson Street; parking is not permitted west of Gough Street. There are no existing bicycle or Muni facilities on Stevenson Street within the study area. The *General Plan* identifies Stevenson Street as a Recreational Street.

Background on Vehicle Miles Traveled in San Francisco and Bay Area

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. 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 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.[65,66]

Table IV.B-1, Daily VMT per Capita—Existing Conditions, presents the existing average daily VMT per capita for residents, and office and retail employees for the nine-county San Francisco Bay Area, for the Citywide average, and for TAZ 578 in which the project site is located. For residential development, the regional average daily VMT per capita is 17.2.[67] For office development, regional average daily work-related VMT per employee is 19.1. For retail development, regional average daily retail VMT per employee is 14.9.[68]

TABLE IV.B-1 DAILY VMT PER CAPITA—EXISTING CONDITIONS

Trip Type (Land Use)	Bay Area Regional Average	Citywide Average	TAZ 578[a]
Households (residential)	17.2	7.9	3.7
Employment (office)	19.1	8.8	7.6
Employment (retail)	14.9	5.4	8.9

SOURCES: San Francisco Planning Department Resolution Modifying Transportation Impact Analysis, Attachment E: Screening Criteria for Circulation Analysis and Methodology for Travel Demand Analysis (March 2016), and San Francisco Planning Department Transportation Information Map (TIM), http://www.sftransportationmap.org.

NOTE:

a. The Traffic Analysis Zone (TAZ) in which the project site is located.

As shown on **Table IV.B-1**, the current average daily VMT per capita in TAZ 578 is less than the citywide and regional Bay Area averages for the nine-county San Francisco Bay Area.

Transit Network

The project site is well served by public transit. Local service is provided by the San Francisco Municipal Railway (Muni) light rail and bus routes, which can be used to transfer to other bus lines, cable car lines, and Muni Metro light rail lines J Church, K/T Ingleside/Third, L Taraval, M Ocean View, and N Judah at the Muni Van Ness Station (approximately 450 feet east of the project site). Service to and from the East Bay is provided by BART under Market Street accessed from Civic Center BART/Muni Station or 16th Street Mission BART Station (these

[65] 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.

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

[67] Includes the VMT generated by the households in the development.

[68] 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.

BART stations are both approximately one-half mile from the project site), and AC Transit buses from the Transbay Terminal. Service to and from the North Bay is provided by Golden Gate Transit along Van Ness Avenue and at the Transbay Terminal, and ferry service from the Ferry Building. Service to and from the Peninsula and South Bay is provided by Caltrain at its terminal located at Fourth and Townsend Streets, and by the San Mateo County Transit District (SamTrans) at the Transbay Terminal and along Mission Street.

Local Transit

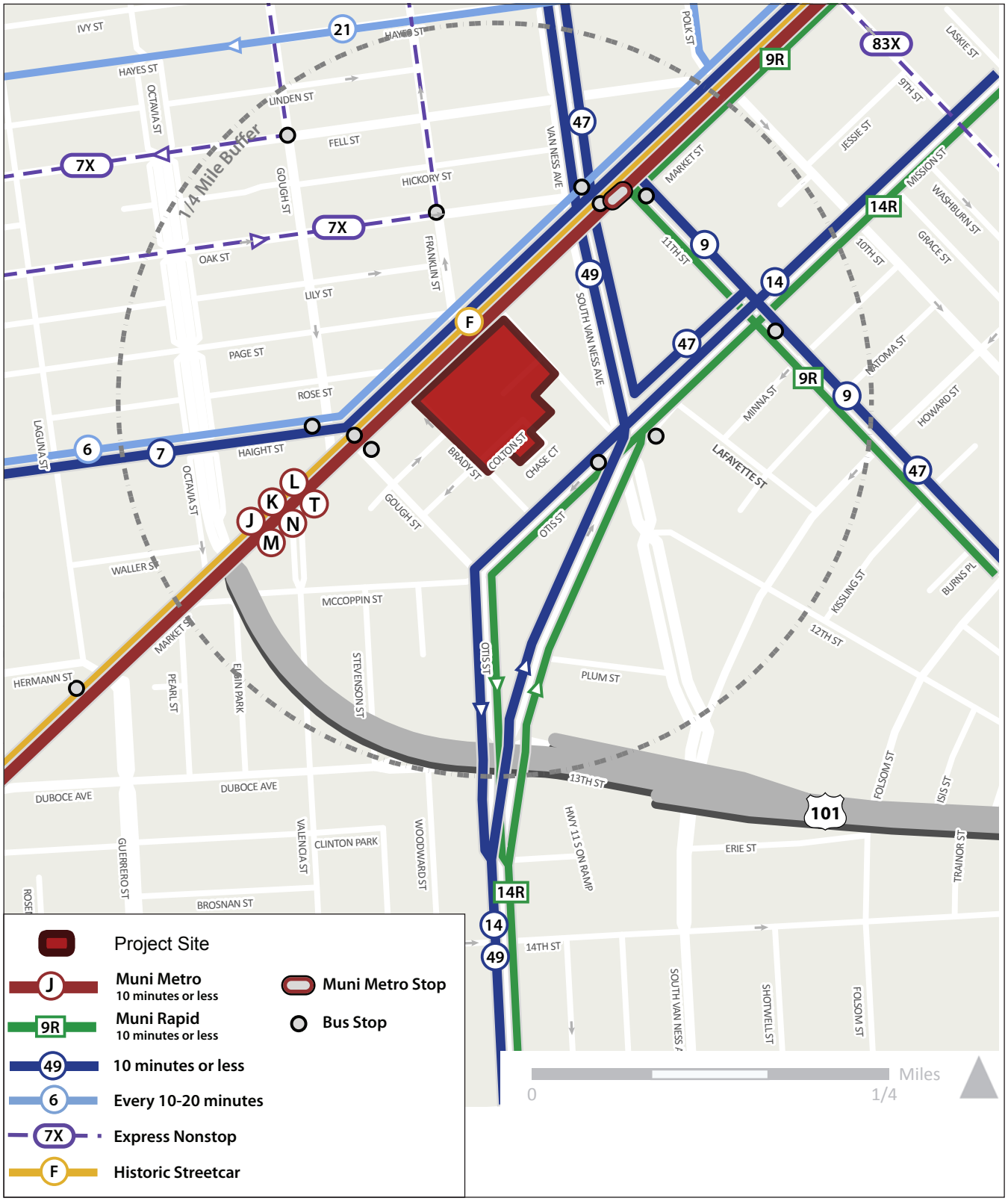
Muni provides transit service within the City, including bus routes (diesel, diesel-hybrid electric, and electric trolley) and cable car, light rail, and historic streetcar lines. Muni operates numerous bus routes in the vicinity of the project site, including routes on Market Street, Mission/Otis Streets, 11th Street and on South Van Ness Avenue.

Figure IV.B-1, Existing Transit Network, on following page, presents the transit service in the vicinity of the project site. The service frequencies and nearest stop location for the routes that operate in the vicinity of the project site are shown in **Table IV.B-2, Muni Service in Project Vicinity—Weekday Frequency**.

Regional Transit

Bay Area Rapid Transit (BART). BART provides regional commuter rail service between the East Bay (from Pittsburg/Bay Point, Richmond, Dublin/Pleasanton and Fremont), San Mateo County (from San Francisco International Airport and Millbrae), and San Francisco, with operating hours between 4:00 a.m. and midnight. Within San Francisco, BART operates underground below Market Street from Embarcadero Station to Civic Center Station and through the Mission District to Daly City. During the weekday PM peak period, headways are generally five to 15 minutes for each line. The BART stations most accessible to the project site are the Civic Center Station, located at Market Street and Eighth Street, and the 16th Street/Mission Station. These stations are both approximately 0.5 mile from the project site.

Golden Gate Transit (GGT). The Golden Gate Bridge, Highway, and Transportation District provides bus and ferry service between the North Bay (Marin and Sonoma counties) and San Francisco. Golden Gate Transit (GGT) operates 22 commuter bus routes, nine basic bus routes, and 16 ferry feeder bus routes. The 22 commuter bus routes serve stops in San Francisco, while the other GGT bus routes do not enter the city. The GGT buses that service the project site are Routes 10, 54, 70, 93, 101, and 101X, with stops at the intersection of McAllister Street and Polk Street (about 0.5 mile north of the project site). GGT also operates ferry service between the North Bay and San Francisco between 5:00 a.m. and 10:00 p.m. on weekdays, with headways between 30 and 90 minutes depending on the time of the day and day of the week. The ferry service connects Larkspur and Sausalito with the Ferry Building, which is approximately two miles northeast of the project site and is accessible via the J-Church, KT-Ingleside/Third Street, L-Taraval, M-Ocean View, N-Judah, 9/9R-San Bruno, 14/14R-Mission.



SOURCE: Fehr & Peers

1629 Market Street: Case No. 2015-005848ENV

Figure IV.B-1
Existing Transit Network

TABLE IV.B-2 MUNI SERVICE IN PROJECT VICINITY—WEEKDAY FREQUENCY

Route[a]	Service Frequency (minutes)		Nearest Stop Location (inbound, outbound)
	AM (7:00 to 9:00 a.m.)	PM (4:00 to 6:00 p.m.)	
6 Parnassus	10	10	Market/Van Ness, Market/Van Ness
7/7R Haight-Noriega	12	10	Market/Van Ness, Market/Van Ness
9 San Bruno	12	12	11th/Market, 11th/Market
9R San Bruno Rapid	12	12	11th/Market, 11th/Market
14 Mission	8	8	Mission/11th, Otis/South Van Ness Avenue
14R Mission Rapid	8	8	Mission/11th, Mission/11th
47 Van Ness	10	10	Van Ness/Market, Van Ness/Market
49 Van Ness-Mission	7	10	Market/Van Ness, Market/Van Ness
F Market	5	5	Market/Van Ness, Market/Van Ness
J Church	9	9	Van Ness Station
K/T Ingleside/Third	9	9	Van Ness Station
L Taraval	8	8	Van Ness Station
M Ocean View	9	9	Van Ness Station
N Judah	7	7	Van Ness Station

SOURCE: SF Planning Department, *Transit Effectiveness Project Draft EIR*, July 10, 2013, Case No. 2011.0558E. Updated https://www.sfmta.com/projects-planning/projects/muni-forward-0.

NOTE:

a. Service frequencies include Muni Forward service improvements on the 9R San Bruno Rapid, 14R Mission Rapid, and K/T Ingleside/Third. Muni Forward service changes on the 6 Parnassus, 7/7R Haight-Noriega, 9 San Bruno, 47 Van Ness, 49 Van Ness-Mission, F Market, J Church, L Taraval, M Ocean View, and N Judah have been approved, but not implemented as of September 2016.

Alameda-Contra Costa County Transit District (AC Transit). AC Transit operates bus service in western Alameda and Contra Costa Counties, as well as routes to the City of San Francisco and San Mateo County. AC Transit operates 27 "Transbay" bus routes between the East Bay and the Transbay Terminal in San Francisco, temporarily located at Howard Street and Beale Street (about two miles northeast of the project site), which is near many major San Francisco Muni routes. The temporary Transbay Terminal is accessible from the project site via the J-Church, KT-Ingleside/Third Street, L-Taraval, M-Ocean View, N-Judah, 9/9R-San Bruno, and the 14/14R-Mission. The permanent Transbay Terminal is expected to open in 2017 and will also be accessible via these routes from the project site. The permanent Transbay Terminal will be located 1.8 miles northeast of the project site. Most Transbay service is provided only during commute periods, with headways of approximately 15 to 20 minutes. Limited service is provided during off-peak hours.

Caltrain. Caltrain provides passenger rail service on the Peninsula between San Francisco and Downtown San Jose with stops in San Mateo County and Santa Clara County. Limited service is available south of San Jose. Within San Francisco, Caltrain terminates at the Fourth/King Station in the South of Market Area (SoMa). The project site is located approximately 1.5 miles to the west of the Fourth/King Station. This station is accessible via the 47 Van Ness, which stops at the intersection of Townsend Street and Fifth Street. Caltrain service headways during the AM and PM peak periods are between five and 60 minutes, depending on the type of train (i.e., local, limited, or express "Baby Bullet"). The Fourth/King Station is served by local, limited, and "Baby

Bullet" trains. In the weekday AM and PM peak periods, the station is served around four times per hour by a mix of limited trains and Baby Bullet trains.

San Mateo County Transit District (SamTrans). SamTrans operates bus and rail service in San Mateo County, with select routes providing transit service outside of the County. SamTrans Routes 292, 391, and 397 serve Downtown San Francisco, providing connections to San Mateo County destinations. In general, SamTrans service to downtown San Francisco operates along Mission Street to the Transbay Terminal at First Street and Mission Street. SamTrans Route 397 serving Downtown San Francisco stops within the study area at the intersection of Market Street and 11th Street. SamTrans cannot pick up northbound passengers or drop off southbound passengers within San Francisco.

Local and Regional Capacity Utilization Analysis

The assessments of existing and future transit conditions for proposed projects in San Francisco is typically performed through the analysis of local transit (Muni) and regional transit (BART, AC Transit, Golden Gate Transit, SamTrans, Caltrain, and ferry service) screenlines.[69] Each screenline is further subdivided into major transit corridors (Muni) or service provider (regional transit). Screenline values represent service capacity, ridership, and capacity utilization at the maximum load point according to the direction of travel for each of the routes that comprise the transit corridor. Capacity utilization relates the number of passengers per transit vehicle to the design capacity of the vehicle. The capacity per vehicle includes both seated and standing capacity, where standing capacity is between 30 to 80 percent of seated capacity (depending upon the specific transit vehicle configuration). Muni has established a peak period capacity utilization standard of 85 percent of the design capacity of the vehicle.[70]

Muni Downtown Screenlines. Four screenlines have been established in San Francisco to analyze potential impacts of projects on Muni service: Northeast, Northwest, Southwest, and Southeast, with subcorridors within each screenline. The analysis of Muni downtown screenlines assesses the effect of project-generated transit-trips on transit capacity in the inbound direction (i.e., towards downtown) during the AM peak hour, and in the outbound direction (i.e., away from downtown) during the PM peak hour.

The existing transit passenger load, capacity, and capacity utilization at each screenline and corridor during the weekday AM and PM peak hours are presented in **Table IV.B-3, Muni Downtown Screenline Analysis, Existing Conditions—Weekday PM Peak Hour**. Muni's established capacity utilization standard for peak period operations is 85 percent. It should be noted that the 85 percent utilization accounts for seated and standing passengers, so at 85 percent utilization all seats are taken and there are many standees. Under existing conditions, the Muni downtown screenlines operate below the 85 percent capacity utilization standard. In addition, a number of corridors, such as the Fulton/Hayes (PM peak hour at 90 percent capacity utilization), and Third Street (PM peak hour at 99 percent capacity utilization) corridors operate above the 85 percent capacity standard.

[69] The concept of screenlines is used to describe the magnitude of travel to or from the greater downtown area, and to compare estimated transit ridership to available capacities. Screenlines are hypothetical lines that would be crossed by persons traveling between downtown and its vicinity and other parts of San Francisco and the region.

[70] The average load during any 15-minute time interval should not exceed 119 passengers for a light rail vehicle, 94 passengers for a 60-foot motor or trolley coach, 63 passengers for a 40-foot motor or trolley coach, and 45 passengers for a 30-foot motor coach (see *SF Guidelines 2002*, p. F-6).

TABLE IV.B-3 MUNI DOWNTOWN SCREENLINE ANALYSIS, EXISTING CONDITIONS—WEEKDAY PM PEAK HOUR

Screenline/Corridor	Hourly Ridership[a]	Hourly Capacity[a]	Capacity Utilization
Northeast			
Kearny/Stockton	2,245	3,227	68%
Other	683	1,078	63%
Subtotal	*2,928*	*4,405*	*67%*
Northwest			
Geary	1,964	2,623	75%
California	1,322	1,752	75%
Sutter/Clement	425	630	67%
Fulton/Hayes	1,184	1,323	**90%**
Balboa	625	974	64%
Subtotal	*5,520*	*7,302*	*76%*
Southeast			
Third	782	793	**99%**
Mission	1,407	2,601	54%
San Bruno/Bayshore	1,536	2,134	72%
Other	1,084	1,675	65%
Subtotal	*4,809*	*7,203*	*67%*
Southwest			
Subway	4,904	6,164	80%
Haight/Noriega	977	1,554	63%
Other	555	700	79%
Subtotal	*6,436*	*8,418*	*77%*
Total All Screenlines	***19,693***	***27,328***	***72%***

SOURCE: SF Planning Department Memorandum, Transit Data for Transportation Impact Studies, May 2015.
NOTES:
Bold indicates capacity utilization greater than the Muni 85 percent capacity utilization standard.
a. Peak-hour ridership and capacity in passengers per hour.

Regional Screenlines. Three regional screenlines have been established around San Francisco to analyze potential impacts on the regional transit agencies: East Bay (BART, AC Transit, ferries), North Bay (Golden Gate Transit buses and ferries), and the South Bay (BART, Caltrain, SamTrans). For all regional transit operators, the capacity is based on the number of seated passengers per vehicle. All of the regional transit operators have a one-hour load factor standard of 100 percent, which would indicate that all seats are full. The PM peak hour regional screenlines currently operate below their capacity utilization threshold of 100 percent. **Table IV.B-4, Regional Transit Screenline Analysis, Existing Conditions—Weekday PM Peak Hour**, presents the existing weekday AM and PM peak-hour ridership and capacity information for each regional screenline.

TABLE IV.B-4 REGIONAL TRANSIT SCREENLINE ANALYSIS, EXISTING CONDITIONS—WEEKDAY PM PEAK HOUR

Screenline/Operator	Hourly Ridership	Hourly Capacity	Capacity Utilization
East Bay			
BART	24,488	22,784	**107%**
AC Transit	2,256	3,926	57%
Ferry	805	1,615	50%
Subtotal	*27,549*	*28,325*	*97%*
North Bay			
GGT buses	1,384	2,817	49%
Ferry	968	1,959	49%
Subtotal	*2,352*	*4,776*	*49%*
South Bay			
BART	13,500	18,900	71%
Caltrain	2,377	3,100	77%
SamTrans	141	320	44%
Subtotal	*16,018*	*22,320*	*72%*
Total All Screenlines	***45,919***	***55,421***	***83%***

SOURCE: SF Planning Department Memoranda, Transit Data for Transportation Impact Studies, May 2015; Updated BART Regional Screenlines, October 2016.

NOTE:
Bold indicates capacity utilization greater than the regional operator 100 percent capacity utilization standard.

As indicated on **Table IV.B-4**, with the exception of BART, all regional transit providers operate at less than their load factor standards during the PM peak hour, which indicates that seats are generally available. BART ridership capacity utilization in the outbound direction to the East Bay during the PM peak hour (i.e., leaving downtown San Francisco) exceeds the 100 percent capacity utilization standard, which indicates that all seats are full and many passengers are standing.

Pedestrian Conditions

Sidewalks adjacent to the project site vary in width from seven to 15 feet. All sidewalk widths are compliant with the minimum sidewalk widths put forth in the *Better Streets Plan*, except for the sidewalks along Otis Street. Otis Street is classified as a Neighborhood Commercial Street in the *Better Streets Plan* with a minimum sidewalk width of 12 feet, and the current sidewalk along Otis Street is 10 feet wide. Street trees are present along several

sidewalks along the project site frontages, narrowing the effective width of the sidewalk.[71] Sidewalk quality is inconsistent along the project frontages and on the streets internal to the project site. Some portions of the sidewalks are uneven and cracked. Along Colton Street within the project site, the sidewalk is particularly rough and uneven, posing a potential hazard to pedestrians using a wheelchair along the street. Several curb cuts are present along the project site's frontages and internal streets. The high number of curb cuts can pose a pedestrian safety concern, as vehicles may turn in and out of these driveways, crossing the sidewalk. However, few vehicles were observed traveling in and out of these driveways during the site observation during the AM and PM peak hours in February 2016.

Pedestrian crosswalks, Americans with Disabilities Act (ADA)-accessible curb ramps, and pedestrian signals (including countdown signals) are provided at the signalized intersections in the project vicinity. No marked crosswalks are striped at the unsignalized intersections of Brady Street/Stevenson Street, Brady Street/Colton Street, or Brady Street/Otis Street. There is also no marked crosswalk present across Stevenson Street along 12th Street.

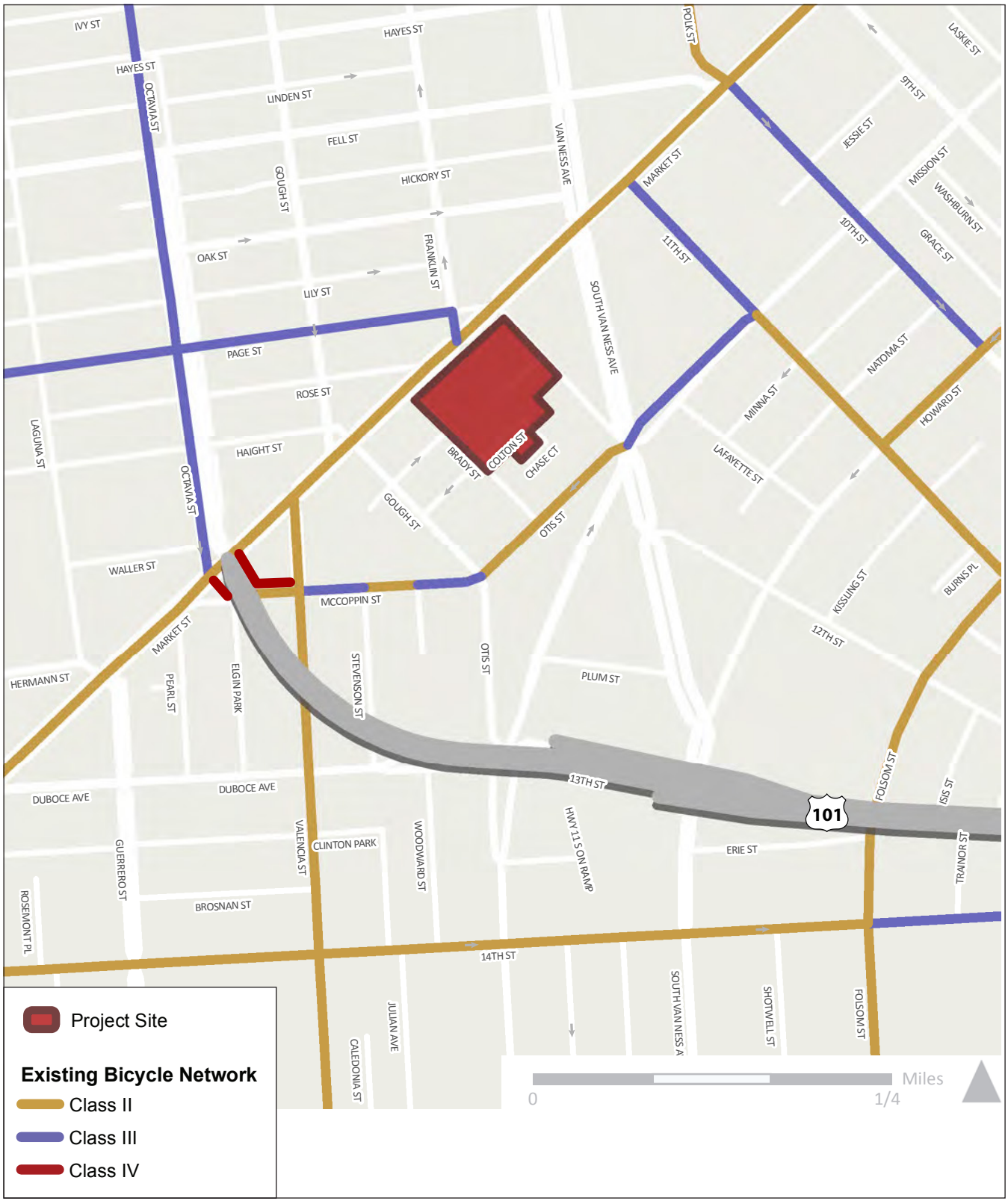
A qualitative evaluation of existing pedestrian conditions in the immediate vicinity of the project site was conducted during field visits in February 2016. Moderate levels of pedestrian activity were observed on blocks adjacent to the project site during the PM peak period. The highest observed PM peak hour pedestrian crossing volumes were along Market Street, where close to 1,900 crossings were observed at the intersection of Market Street/12th Street/Franklin Street/Page Street. High pedestrian volumes were also observed along South Van Ness Avenue, with about 1,400 people crossing northbound or southbound during the PM peak hour. Few pedestrians were observed traveling on the alleys within and along the project site, including Brady Street, Colton Street, and Stevenson Street.

Bicycle Conditions

Figure IV.B-2, Existing Bicycle Network, presents the bicycle network in the vicinity of the project site. Bikeways are typically classified into four classes, primarily based on the level of separation from vehicular traffic.[72] Class I bikeways are bike paths with exclusive right-of-way for use by bicyclists or pedestrians. Class II bikeways are bike lanes striped within the paved areas of roadways and established for the preferential use of bicycles. Class III bikeways are signed bike routes that allow bicycles to share streets or sidewalks with vehicles or pedestrians. Class IV separated bikeway/cycle tracks are separated from vehicular traffic by grade separation, flexible posts, inflexible physical barriers, or on-street parking.

Market Street has Class II bicycle lanes in both directions between Eighth Street and Castro Street. In the section between Eighth and Dolores Streets, the bicycle lanes are buffered from vehicle traffic. On Market Street east of Eighth Street, Class III facilities are provided in each direction. In the vicinity of the project site, other Class II bicycle lanes are provided on Valencia Street (northbound and southbound), 11th Street (northbound and southbound, south of Mission Street), Otis Street (eastbound, between Gough Street and South Van Ness Avenue), Howard Street (westbound, east of 11th Street), and Folsom Street (eastbound).

[71] The *Better Streets Plan*, which was adopted in 2010, creates a unified set of standards, guidelines, and implementation strategies to govern how the City designs, builds, and maintains its pedestrian environment. A key goal of the *Better Streets Plan* is to prioritize the needs of walking, bicycling, transit use, and the use of streets as public spaces for social interaction and community life, following San Francisco's *General Plan*, Transit First Policy, and Better Streets Policy.
[72] Bicycle facilities are defined by the State of California in the California Streets and Highway Code Section, 890.4.



SOURCE: Fehr & Peers

1629 Market Street: Case No. 2015-005848ENV

Figure IV.B-2
Existing Bicycle Network

Class III bicycle routes are provided on 10th Street (southbound, between Market and Howard Streets), and on Octavia Boulevard (northbound and southbound). Mission Street has painted sharrows (Class III route) in the westbound direction between 11th Street and South Van Ness Avenue.

Bay Area Bike Share is a regional public bicycle sharing system that began operation in August 2013. The bicycles are securely docked at stations throughout the City and region. After a user obtains a membership, they may take unlimited trips of up to 30 minutes between stations. The closest existing Bay Area Bike Share station to the project site contains 20 bicycle docks and is located less than 0.1 mile away on South Van Ness Avenue just south of Market Street. Bay Area Bike Share is proposed to be expanded from 700 bicycles to 7,000 bicycles, including additional stations in San Francisco, San Jose, Oakland, Berkeley, and Emeryville.[73]

Bicycle facilities in the project vicinity are well utilized. Bicycle counts were conducted near the project site during the PM peak hour in March 2015. The highest bicycle volumes were observed along Market Street with over 500 bicyclists traveling westbound through the study area during the PM peak hour. A large number of bicyclists (about 100) were observed traveling along Mission and 11th Streets within the study area.

Loading Conditions

There are no existing on-street commercial (yellow) loading zones along the Market, 12th, or Brady Street frontages of the project site. The closest commercial loading zones to the proposed project are two loading zones on 12th Street south of the project site (36 feet and 30 feet long) and one 20-foot loading space on Otis Street between Brady Street and 12th Street. The 36-foot-long and 30-foot-long loading zones can accommodate an SU-30 freight loading vehicle (30 feet long), while the 20-foot-long loading space can accommodate a passenger vehicle.

One on-street passenger (white) loading zone is currently provided along 12th Street south of the project site. This existing passenger loading zone is 42 feet long and can accommodate two passenger vehicles at one time.

Emergency Vehicle Access

The project site has frontages on Brady Street, Market Street, and 12th Street. Emergency vehicle access to the project site is primarily from Market Street and 12th Street. The nearest San Francisco Fire Department (SFFD) station is Station 36 at 109 Oak Street between Franklin and Gough Streets, about 0.1 mile north of the project site. Station 36 is interconnected with adjacent traffic signals at Franklin Street and at Gough Street to facilitate emergency vehicle access from the station in both directions (i.e., to travel westbound against traffic flow on Oak Street to access Gough Street, and to travel eastbound on Oak Street to Franklin Street). The one-block segment of Oak Street between Franklin Street and Van Ness Avenue is used by fire trucks from Station 36 to access South Van Ness Avenue southbound (towards the project site) or Market Street eastbound (towards the 12th Street side of the project site). Other nearby fire stations include Station 6 at 135 Sanchez Street located about 0.7 mile south of the project site, and Station 5 at 1301 Turk Street located about 0.7 mile north of the project site.

[73] More information on Bay Area Bike Share can be accessed at their website: https://bayareabikeshare.com/.

Parking Conditions

On-Street Parking Conditions

Existing parking supply and occupancy conditions were observed within the proposed project study area bounded by 11th Street, Plum Street, Octavia Street, and Fell Street during field visits in February 2016. Parking supply and occupancy data were collected during the site visits. On-street parking regulations in the vicinity of the project site include limited areas with Residential Permit Parking (RPP) "S" and "U", metered and un-metered time-limited parking, and unrestricted parking. On-street parking in the area is generally provided on both sides of the streets, except at the midblock alleyways where parking may exist on one side only, if at all. Most of the on-street parking is one- or two-hour metered or un-metered parking. Within the parking study area, 1,374 parking spaces are present. Total utilization for on-street parking spaces is approximately 87 percent (1,191 spaces) at midday (1:30 to 3:00 p.m.) and approximately 61 percent (831 spaces) in the evening (6:30 to 8:00 p.m.).

Off-Street Parking Conditions

The existing off-street parking conditions were examined within the parking study area. Parking occupancy conditions were assessed for the weekday midday (1:30 to 3:00 p.m.) and evening (6:30 to 8:00 p.m.) periods. **Table IV.B-5, Off-Street Public Parking Supply and Utilization, Weekday Midday and Evening Conditions**, presents the total parking supply for these facilities and the midday and evening parking occupancies. Eight nearby public garages and lots were observed. These parking facilities offer a mix of daily and monthly parking permits. Four parking lots and one parking garage offer 24-hour service, while the rest are solely open during weekday business hours. Based on observations, the nearby public off-street parking facilities have about 735 parking spaces and are at approximately 90 percent occupancy at midday, and the 470 spaces available in the evening are approximately 60 percent occupied.

In addition to the public off-street facilities described above, there are 242 spaces in the four lots currently located on the project site that are open to the public, and utilization of these lots is 77 percent and 22 percent at midday and in the evening, respectively. The existing public parking facilities on the project site offer a mix of daily and monthly parking permits, though 19 spaces in the parking lot accessible from Market Street are reserved for employees and visitors of the UA Local 38. Some drivers utilizing the on-site lots may park at these facilities to access employment and retail opportunities beyond the existing uses of the project site, including locations in SoMa and other nearby neighborhoods.

TABLE IV.B-5 OFF-STREET PUBLIC PARKING SUPPLY AND UTILIZATION, WEEKDAY MIDDAY AND EVENING CONDITIONS

Facility (garage or surface lot)	Supply	Occupancy	
		Midday	Evening
1.1500 Mission Street (garage)	100	90%	—
2. 1537 Mission Street (lot)	20	40%	20%
3. 1650 Mission Street (garage)	105	80%	—
4. 1660 Mission Street (garage)	60	90%	—
5. 1455 Market Street/55 11th Street (garage)	300	98%	60%
6. 98 Franklin Street (surface lot)	100	85%	30%
7. 15 Oak Street (surface lot)	30	98%	30%
8. 110 Franklin Street (surface lot)	20	100%	40%
Total	***735***	***90%***	***60%***

SOURCE: Fehr & Peers, 2017.
NOTES:
Parking supply and utilization are an approximation based on observations conducted in February 2016.
"—" indicates that that parking facility is not open during the evening observation periods.

IV.B.3 Regulatory Framework

State

CEQA Section 21099(b)(1) (Senate Bill 743)

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743. SB 743 added Section 21099 to the Public Resources Code (PRC). PRC Section 21099(d)(1) provides that, "aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." This means that, effective January 1, 2014, aesthetics and parking are no longer to be considered in determining if a project has the potential to result in significant environmental effects, provided a project meets all of the following three criteria:

a. The project is residential, mixed-use residential, or an employment center, and

b. The project is on an infill site, and

c. The project is in a transit priority area.

The proposed project meets each of the above three criteria because it is (1) located within one-half mile of several rail, bus, and streetcar transit routes, (2) located on an infill site that is already developed with four surface parking lots, a Bay Area Rapid Transit (BART) ventilation structure, and three buildings: the Civic Center Hotel, which is s temporarily serving as a Navigation Center for formerly homeless individuals (since June 2016); the UA Local 38 building, containing offices and an assembly hall; and the Lesser Brothers Building, containing retail uses; and (3) would include residential, office/assembly hall, and retail/restaurant uses,

meeting the definition of a mixed-use residential project.[74] Therefore, the proposed project satisfies each of the above criteria and therefore qualifies as a transit-oriented infill project subject to PRC Section 21099.

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 recommending that transportation impacts for projects be measured using a VMT metric.[75] On March 3, 2016, based on compelling evidence in that document and on the City's independent review of the literature on level of service (LOS) and VMT, 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 impacts on non-automobile modes of travel such as riding transit, walking and bicycling.)

Local

Transit First Policy

In 1998, the San Francisco voters amended the City Charter (Charter Article 8A, Section 8A.115) to include a Transit First Policy, which was first articulated as a City priority policy by the Board of Supervisors in 1973. The Transit First Policy is a set of principles that underscore the City's commitment to give priority to travel by transit, bicycle, and foot over the private automobile. These principles are embodied in the policies and objectives of the Transportation Element of the *General Plan*. All City boards, commissions, and departments are required, by law, to implement transit first principles in conducting City affairs.

Vision Zero Policy

Vision Zero is San Francisco's road safety policy.[76] The City adopted Vision Zero as a policy in 2014, committing to build better and safer streets, educate the public on traffic safety, enforce traffic laws, and adopt policy changes that save lives. The goal is to create a culture that prioritizes traffic safety and to ensure that mistakes on roadways do not result in serious injuries or death. Vision Zero sets a policy to eliminate traffic fatalities by 2024.

[74] San Francisco Planning Department, *Eligibility Checklist: CEQA Section 21099—Modernization of Transportation Analysis for 1629 Market Street*, June 7, 2016. This document (and all other documents cited in this report, unless otherwise noted) is available for review at 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case No. 2015-005848ENV.
[75] OPR, *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, Implementing Senate Bill 743 (Steinberg, 2013)*, January 20, 2016.
[76] Information on Vision Zero is available at http://visionzerosf.org/about/what-is-vision-zero/.

San Francisco General Plan

The Transportation Element of the *General Plan* is composed of objectives and policies that relate to the eight aspects of the citywide transportation system: General Regional Transportation, Congestion Management, Vehicle Circulation, Transit, Pedestrian, Bicycles, Citywide Parking, and Goods Management. The Transportation Element references San Francisco's Transit First Policy in its introduction, and contains objectives and policies that are directly pertinent to consideration of the proposed project, including objectives related to locating development near transit facilities, encouraging transit use, and timing traffic signals to emphasize transit, pedestrian, and bicycle traffic as part of a balanced multimodal transportation system. The *General Plan* also emphasizes alternative transportation through the positioning of building entrances, making improvements to the pedestrian environment, and providing safe bicycle parking facilities.

San Francisco Bicycle Plan

The *San Francisco Bicycle Plan* (*Bicycle Plan*) describes a City program to provide the safe and attractive environment needed to promote bicycling as a transportation mode. The *Bicycle Plan* identifies the citywide bicycle route network and establishes the level of treatment (i.e., Class I, Class II, or Class III facility) on each route. The *Bicycle Plan* also identifies near-term improvements that could be implemented within five years, as well as policy goals, objectives, and actions to support these improvements. It also includes long-term improvements, and minor improvements that would be implemented to facilitate bicycling in San Francisco.

San Francisco Better Streets Plan

The *Better Streets Plan* focuses on creating a positive pedestrian environment through measures such as careful streetscape design and traffic calming measures to increase pedestrian safety. The *Better Streets Plan* includes guidelines for the pedestrian environment, which it defines as the areas of the street where people walk, sit, shop, play, or interact. Generally speaking, the guidelines are for the design of sidewalks and crosswalks; however, in some cases, the *Better Streets Plan* includes guidelines for certain areas of the roadway, particularly at intersections.

Transportation Sustainability Program

The Transportation Sustainability Program is an initiative aimed at improving and expanding the transportation system to help accommodate new growth, and create a policy framework for private development to contribute to minimizing its impact on the transportation system, including helping to pay for the system's enhancement and expansion. The Transportation Sustainability Program is a joint effort by the Mayor's Office, the Planning Department, the San Francisco Municipal Transportation Agency (SFMTA), and the San Francisco County Transportation Authority (Transportation Authority), comprised of the following three objectives:

- **Fund Transportation Improvements to Support Growth**—The Transportation Sustainability Fee (TSF) is assessed on new development, including residential development, to help fund improvements to transit capacity and reliability as well as bicycle and pedestrian improvements. The TSF was passed by the Board of Supervisors and signed into law by the Mayor on November 25, 2015 (Board of Supervisors File No. 150790).[77] The new TSP supersedes the TIDF, with some exceptions, that was levied on most

[77] Two additional files were created at the Board of Supervisors from TSF regarding hospitals and health services, grandfathering, and additional fees for large projects: 151121 and 151257.

new non-residential development citywide to offset new development's impacts on the transit system. The TSF is applicable to the proposed project.

- **Modernize Environmental Review**—This component of the Transportation Sustainability Program changes how the City analyzes impacts of new development on the transportation system under the California Environmental Quality Act (CEQA). This reform has been helped by California Senate Bill 743, which requires that the existing transportation review standard, focused on automobile delay (vehicular level of service), be replaced with VMT. VMT is a measure of the amount and distance that a project causes potential residents, tenants, employees, and visitors of a project to drive, including the number of passengers within a vehicle. Resolution 19579 regarding this reform was adopted at the Planning Commission hearing on March 3, 2016.
- **Encourage Sustainable Travel**—This component of the Transportation Sustainability Program would help manage demand on the transportation network through a Transportation Demand Management (TDM) Program, making sure new developments are designed to make it easier for new residents, tenants, employees, and visitors to get around by sustainable travel modes such as transit, walking, and biking. Each measure that would be included in the TDM program is intended to reduce VMT traveled from new development. *Planning Code* amendments to implement the TDM program, along with TDM Program Standards, were approved by the Planning Commission on August 4, 2016 (Resolutions 19715 and 19716). The TDM Program Standards were updated on January 17, 2017 (Resolution 19838), and the *Planning Code* amendments were adopted by the Board of Supervisors on February 7, 2017 (Ordinance 34-17).

IV.B.4 Impacts and Mitigation Measures

Significance Thresholds

The significance criteria listed below are organized by mode to facilitate explanation of the transportation impact analysis; however, the transportation significance thresholds are essentially the same as the ones in the environmental checklist (state CEQA Guidelines Appendix G). For the purpose of this analysis, the following applicable thresholds were used to determine whether implementing the proposed project would result in a significant impact on transportation and circulation:

- **VMT**—The project would have a significant effect on the environment if it would cause substantial additional VMT; or

  The project would have a significant effect on the environment if it would substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow travel lanes) or by adding new roadways to the network;
- **Traffic Hazards**—The project would have a significant adverse impact if it would cause major traffic hazards;
- **Transit**—A project would have a significant effect on the environment if it would cause a substantial increase in transit demand that could not be accommodated by adjacent transit capacity, resulting in unacceptable levels of transit service; or cause a substantial increase in delays or operating costs such that significant adverse impacts in transit service levels could result. With the Muni and regional transit screenlines analyses, the project would have a significant effect on the transit provider if project-related transit trips would cause the capacity utilization standard to be exceeded during the peak hour, or contribute considerably (i.e., a contribution of five percent or more) to ridership at a screenline or

corridor currently operating, or projected to operate under cumulative conditions, at greater than the transit provider's capacity utilization standard;

- **Pedestrians**—A project would have a significant effect on the environment if it would result in substantial overcrowding on public sidewalks, create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas;
- **Bicycles**—A project would have a significant effect on the environment if it would create potentially hazardous conditions for bicyclists or otherwise substantially interfere with bicycle accessibility to the site and adjoining areas;
- **Loading**—A project would have a significant effect on the environment if it would result in a loading demand during the peak hour of loading activities that could not be accommodated within proposed on-site loading facilities or within convenient on-street loading zones, and if it would create potentially hazardous traffic conditions or significant delays affecting traffic, transit, bicycles or pedestrians;
- **Emergency Vehicle Access**—A project would have a significant effect on the environment if it would result in inadequate emergency access; or
- **Construction**—Construction of the project would have a significant effect on the environment if, in consideration of the project site location and other relevant project characteristics, the temporary construction activities' duration and magnitude would result in substantial interference with pedestrian, bicycle, transit, or vehicle circulation and accessibility to adjoining areas thereby resulting in potentially hazardous conditions.

The project site is not located within an area covered by an airport land use plan or within two miles of a public airport or public use airport; nor is it within the vicinity of a private airstrip. Therefore, implementation of the proposed project would not 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, and these issues are not addressed further in this EIR.

Approach to Analysis

This section presents the methodology for analyzing transportation impacts and information considered in developing travel demand forecasts for the proposed project. The impacts of the proposed project on the surrounding roadways were analyzed using the guidelines set forth in the *SF Guidelines* and Planning Commission Resolution 19579 and supporting materials, which provide direction for analyzing transportation conditions and identifying the transportation impacts of a proposed project in San Francisco.

The analysis of the proposed project was conducted for existing and cumulative conditions, 2040 cumulative conditions as applicable. "Existing plus project" conditions assess the near-term impacts of the proposed project, while "2040 cumulative" conditions assess the long-term impacts of the proposed project in combination with other reasonably foreseeable development. Additionally, some cumulative projects were considered during the programming of the streets adjacent to the project site, as discussed further below.

As discussed above, Senate Bill 743 amended CEQA by adding Public Resources Code Section 21099 regarding the analysis of parking impacts for certain urban infill projects in transit priority areas.[78] Public Resources Code Section 21099(d), effective January 1, 2014, provides that "… parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment." Accordingly, parking is no longer to be considered in determining if a project has the potential to result in significant environmental effects for projects that meet all three criteria established in the statute. The proposed project meets all of the criteria, and thus the transportation impact analysis does not consider the adequacy of parking in determining the significance of project impacts under CEQA.[79] However, the Planning Department acknowledges that parking conditions may be of interest to the public and the decision-makers. Therefore, this EIR presents a parking demand analysis for informational purposes and considers any secondary physical impacts associated with constrained supply (e.g., queuing by drivers waiting for scarce on-site parking spaces that affects the public right-of-way) as applicable in the following transportation impact analysis.

Vehicle Miles Traveled Analysis

Land use projects and plans may cause substantial additional VMT. The following discussion identifies thresholds of significance and screening criteria used to determine if a land use project would result in significant impacts under the VMT metric.

For residential projects, a project would generate substantial additional VMT if it exceeds the regional household VMT per capita minus 15 percent.[80] For office projects, a project would generate substantial additional VMT if it exceeds the regional VMT per employee minus 15 percent. As documented in the Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA ("proposed transportation impact guidelines"), a 15 percent threshold below existing development is "both reasonably ambitious and generally achievable."[81] For retail projects, the Planning Department uses a VMT efficiency metric approach for retail projects: a project would generate substantial additional VMT if it exceeds the regional VMT per retail employee minus 15 percent. This approach is consistent with CEQA Section 21099 and the thresholds of significance for other land uses recommended in OPR's proposed transportation impact guidelines. For mixed-use projects, each proposed land use is evaluated independently, per the significance criteria described above.

OPR's proposed transportation impact guidelines provide screening criteria to identify types, characteristics, or locations of land use projects that would not exceed these VMT thresholds of significance. OPR recommends

[78] A "transit priority area" is defined as an area within one-half mile of an existing or planned major transit stop. A "major transit stop" is defined in California Public Resources Code Section 21064.3 as a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. A map of San Francisco's Transit Priority Areas is available at http://sfmea.sfplanning.org/Map%20of%20San%20Francisco%20Transit%20Priority%20Areas.pdf.

[79] San Francisco Planning Department, Eligibility Checklist: CEQA Section 21099—Modernization of Transportation Analysis for 1629 Market Street, June 7, 2016.

[80] OPR's proposed transportation impact guidelines state a project would cause substantial additional VMT if it exceeds both the existing City household VMT per capita minus 15 percent and existing regional household VMT per capita minus 15 percent. In San Francisco, the City's average VMT per capita is lower (8.4) than the regional average (17.2). Therefore, the City average is irrelevant for the purposes of the analysis.

[81] Governor's Office of Planning and Research, *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, January 20, 2016, p. III:20. Available at https://www.opr.ca.gov/s_sb743.php.

that if a project or land use proposed as part of the project meets any of the screening criteria shown below, then VMT impacts are presumed to be less than significant for that land use and a detailed VMT analysis is not required. These screening criteria and how they are applied in San Francisco are as follows:

- **Map-Based Screening for Residential, Office, and Retail Projects.** OPR recommends mapping areas that exhibit where VMT is less than the applicable threshold for that land use. Accordingly, the Transportation Authority has developed maps depicting existing VMT levels in San Francisco for residential, office, and retail land uses based on the SF-CHAMP 2012 base-year model run. The Planning Department uses these maps and associated data to determine whether a proposed project is located in an area of the city that is below the VMT threshold. Projects that are located in areas with low VMT, and that incorporate similar features (i.e., density, mix of uses, transit accessibility) will tend to exhibit similarly low VMT.
- **Proximity to Transit Stations.** OPR recommends that residential, retail, and office projects, as well as projects that are a mix of these uses, proposed within 0.5 mile of an existing major transit stop (as defined by CEQA Section 21064.3) or an existing stop along a high-quality transit corridor (as defined by CEQA 21155) would not result in a substantial increase in VMT. However, this presumption would not apply if the project (1) would have a floor area ratio of less than 0.75; (2) include more parking for use by residents, customers, or employees of the project than required or allowed, without a conditional use; or (3) is inconsistent with the applicable Sustainable Communities Strategy.[82]

OPR's proposed transportation impact guidelines do not provide screening criteria or thresholds of significance for other types of land uses, other than those projects that meet the definition of a small project. Therefore, the Planning Department provides additional screening criteria and thresholds of significance to determine if land uses similar in function to residential, office, and retail would generate a substantial increase in VMT. These screening criteria and thresholds of significance are consistent with CEQA Section 21099 and the screening criteria recommended in OPR's proposed transportation impact guidelines.

The Planning Department applies the Map-Based Screening and Proximity to Transit Station screening criteria to the following land use types:

- **Grocery Stores, Local-Serving Entertainment Venues, Religious Institutions, Parks, and Athletic Clubs**—Trips associated with these land uses typically function similar to retail. Therefore, these types of land uses are treated as retail for screening and analysis.

Induced Automobile Travel Analysis

Transportation projects may substantially induce additional automobile travel. However, OPR's proposed transportation impact guidelines include a list of transportation project types that would not likely lead to a substantial or measureable increase in VMT. If a project fits within the general types of projects (including combinations of types) described below, then it is presumed that VMT impacts would be less than significant and a detailed VMT analysis is not required.

- Active Transportation, Rightsizing (aka Road Diet), and Transit Projects:
    - Infrastructure projects, including safety and accessibility improvements, for people walking or bicycling; and

[82] A project is considered to be inconsistent with the Sustainable Communities Strategy if development is located outside of areas contemplated for development in the Strategy.

- Other Minor Transportation Projects:
  - Removal of off-street or on-street parking spaces; and
  - Adoption, removal, or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs).

Transit Analysis

The impact of additional weekday AM and PM peak-hour transit ridership generated by the proposed project on local and regional transit providers was assessed by comparing the projected ridership to the available transit capacity, using the screenline and corridor analysis used to describe existing conditions (see Environmental Setting). In addition, the impact of the proposed project's vehicular access to on-site garages and loading areas on Muni transit routes that run adjacent to the project site were assessed qualitatively.

Local Transit

Muni Downtown Screenlines. The availability of Muni service capacity was analyzed in terms of a series of screenlines. The concept of screenlines is used to describe the magnitude of travel to or from the greater downtown area, and to compare estimated transit volumes to available capacities. Screenlines are hypothetical lines that would be crossed by persons traveling between downtown and its vicinity and other parts of San Francisco and the region. Four screenlines have been established in San Francisco to analyze potential impacts of projects on Muni service: northeast, northwest, southwest, and southeast, with sub-corridors within each screenline. The bus routes and light rail lines used in this screenline analysis are considered the major commute routes from the downtown area. Other bus lines, such as "community connector"[83] routes and routes with greater than 10-minute headways between buses are not included, due to their generally lower ridership.

The screenline analysis generally compares the total ridership on routes crossing a given screenline with the available capacity. The ridership for each route in the screenline analysis was taken at the maximum load point, which is the location of greatest ridership demand for the route. For the purpose of this analysis, Muni ridership measured at the four San Francisco screenlines and sub-corridors represents the peak direction of travel and patronage loads for the Muni system, which corresponds with the morning commute in the inbound direction towards downtown San Francisco, and the evening commute in the outbound direction from the downtown area to other parts of San Francisco.

As noted above, Muni's established capacity utilization standard for peak period operations is 85 percent. It should be noted that the 85 percent utilization is of seated and standing loads, so at 85 percent, all seats are taken, and there are many standees. Muni screenlines and subcorridors at or near 85 percent capacity operate under noticeably crowded conditions with many standees. Because each screenline and most sub-corridors include multiple lines, each with several vehicles operating during the peak hour, some individual vehicles may operate at or above 85 percent of capacity and are extremely crowded, while others operate under less crowded conditions. Moreover, the extent of crowding is exacerbated whenever target headways are not met through either missed runs and/or bunching in service. Thus, in common with other types of transportation operations

[83] The category of community connector routes includes lightly used bus routes that circulate through San Francisco's hillside residential neighborhoods to fill in gaps in coverage and connect passengers to the core network.

such as roadways and parking facilities, transit operators may experience substantial problems in service delivery even when operating at less than 85 percent of capacity.

Regional Screenlines. A screenline analysis was also performed on the regional transit carriers (AC Transit, BART, Caltrain, Golden Gate Transit and SamTrans), in order to determine the current service volumes and capacity. Three regional screenlines have been established around San Francisco to analyze potential impacts of projects on the regional transit carriers. For the purpose of this analysis, the ridership and capacity at the three regional screenlines represents the peak direction of travel and patronage loads, which corresponds with the morning commute in the inbound direction towards downtown San Francisco and the evening commute in the outbound direction from downtown San Francisco to the region. For regional operators, the maximum load point is typically at the San Francisco city limit (i.e., the East Bay maximum load point is at the Transbay Tube and on the Bay Bridge; the North Bay maximum load point is at the Golden Gate Bridge; and the South Bay maximum load point is generally at the southern city border). As a means to determine the amount of available space for each regional transit provider, capacity utilization is also used. For all regional transit operators, the capacity is based on the number of seated passengers per vehicle. All of the regional transit operators have a one-hour load factor standard of 100 percent, which would indicate that all seats are full.

Pedestrian Analysis

Pedestrian conditions were assessed qualitatively, including an assessment of safety and right-of-way issues, potential worsening of existing or creation of new safety hazards, and conflicts with bicycles, transit, and vehicles.

Bicycle Analysis

Bicycle conditions were assessed qualitatively as they relate to the project site, including bicycle routes, safety and right-of-way issues, and conflicts with pedestrians and vehicular traffic.

Loading Analysis

Loading was analyzed by comparing the on-site loading spaces supplied by the proposed project to *Planning Code* requirements and projected loading demand, as well as consideration of off-site loading spaces that the project sponsor would request be designated by SFMTA in the project vicinity. Any potential for hazards resulting from loading vehicle movements or shortfalls of available loading spaces are analyzed in this section.

Emergency Vehicle Access Analysis

Potential impacts on emergency vehicle access were assessed qualitatively.

Construction Analysis

Potential short-term construction impacts were assessed qualitatively based on impacts of construction-related activity, including staging locations, daily truck and worker volumes, travel lane and/or sidewalk closures, and duration.

Parking Assessment

As explained under Approach to Analysis, the EIR does not consider the adequacy of the parking supply in determining the significance of impacts of the proposed project. Because parking conditions may be of interest to some members of the public and decision-makers, a parking demand analysis is presented for informational purposes. The parking assessment was conducted by comparing the proposed parking supply to both the amount allowed under the *Planning Code* and to the projected demand that would be generated by the proposed project, based on the *SF Guidelines*, which may be an overestimation of actual parking demand. Any potential secondary effects due to a parking deficit identified in the parking demand analysis are addressed in the appropriate environmental topics.

Project Travel Demand

Travel demand refers to the new vehicle, transit, pedestrian and bicycle trips generated by the proposed project. This section provides an estimate of the project-generated person and vehicle trips that would travel to and from the project site. The project site is located in a unique location at the boundary of Superdistrict 3 (SD3), adjacent to the C-3 District. Given the proposed project's downtown-like land use characteristics and proximity to the C-3 District, the proposed project travel demand analysis employs C-3 trip distribution and mode share per the *SF Guidelines*. The proposed project's size, mixed-use nature, and transit-rich setting are likely to yield travel patterns that more closely match the downtown C-3 District than the lower-density SD3.

The use of the UA Local 38 building would not change with the proposed project, which would maintain its two primary components: office space and an assembly hall. The UA Local 38 currently has 14 full-time employees, and this number of daily on-site staff would be the same with construction of the proposed project. The on-site assembly hall would be used for union meetings and infrequent major events, similar to how it is currently programmed. Union meetings would occur once a month on weekday evenings and would include about 20 attendees. Meetings would start at around 6:00 p.m., and their length would vary based on the meeting agenda. Major events at the UA Local 38 building would occur about once or twice per year and would include between 100 and 200 attendees. Major events could take place on weekday evenings or on weekend days. Passenger loading for the UA Local 38 building monthly or annual events would occur primarily on 12th Street. Catering or other delivery trucks would load in the 12th Street loading zone or in the off-street loading zones in the parking garage.

The proposed project's approximately 23,500 square feet of publicly-accessible open space is estimated to generate 19.5 trips per acre, or ten total trips, during the PM peak hour. This is a conservative estimate of park use, as compared to available reference studies. The *Institute of Transportation Engineers (ITE) Trip Generation Manual* trip generation rate for urban parks is 3.5 trips per acre during the PM peak hour, based on much larger parks than the open space included in the proposed project. Similarly, observations of Heron's Head Park in San Francisco yielded a very low trip generation rate per acre of park space (one trip per acre during the PM peak hour). Daily and AM peak hour trips for the proposed project open space were estimated based on the ratio of daily to PM peak hour trips for other land uses at the project site and the ITE AM/PM split for city parks (ITE Code 411).[84] Trips to the proposed project's open space would be local, made by foot, and originate from

[84] Trip rates included in ITE Trip Generation Manual, 9th Edition are 4.5 trips per acre during the AM peak hour and 3.5 trips per acre during the PM peak hour.

nearby residences or offices. The open space would be a neighborhood-scale facility and would not function as a regional destination.

Methodology

Trip Generation Rates. The daily, AM, and PM peak hour person-trip generation for the proposed project accounts for residents, employees, and visitors. The person-trip generation rates from the *SF Guidelines* were applied to the residential units (with different rates for the new studio/one-bedroom and two-or-more-bedroom units), UA Local 38, restaurant, and retail uses in the proposed project. Because the *SF Guidelines* do not provide trip generation rates for AM peak hour conditions, the weekday AM peak hour travel demand for these uses was based on the PM peak hour trip generation rates provided in the *SF Guidelines*, adjusted based on the ratio of AM to PM peak hour trip generation for the residential, restaurant, and retail uses from the ITE Manual.

Mode Split. The project-generated person-trips were assigned to travel modes in order to determine the number of auto, transit, walk and "other" trips. "Other" includes bicycle, motorcycle, taxi and additional modes. Mode split assumptions for work and non-work trips are based on information contained in the *SF Guidelines* for residential, employee, and visitor trips in the C-3 District. It is assumed that all trips to the open space would be made by walking.

Trip Distribution. The distribution of trips for the proposed project was obtained from the *SF Guidelines* for residential, office, and commercial uses within the C-3 District. The distribution is based on the origins and destinations of residential and commercial trips, which are assigned to the four quadrants of San Francisco (Superdistricts 1 through 4), East Bay, North Bay, South Bay, and internal District trips. These patterns were used as the basis for assigning project-generated vehicle trips to the local streets in the study area, and transit trips for the transit corridor analysis. The vehicle trip assignment assumes two driveway access points on Brady and Stevenson Streets.

Loading Demand. The delivery/service vehicle demand is estimated based on the methodology and truck trip generation rates presented in the *SF Guidelines*. Delivery and service vehicle demand is based on the types and amount of land use. No loading trip credit was assumed for the existing uses on the project site.

Parking Demand. Parking demand consists of both long-term demand (typically residents and employees) and short-term demand (typically visitors and patrons). The parking demand for the new uses associated with the proposed project was determined based on the methodology presented in the *SF Guidelines*. The results of these calculations likely overestimate the actual parking demand generated by the proposed project, and therefore are conservative.

- For residential units, the long-term parking demand is based on the number and size of the units at a rate of 1.1 and 1.5 spaces per unit for studios/one bedroom and 2+ bedroom units, respectively.
- For the UA Local 38 (assembly hall and office) and retail/restaurant uses, the long-term parking demand was derived by estimating the number of employees, and applying the trip mode split and average vehicle occupancy from the trip generation calculations. The short-term parking was estimated from the total daily visitor trips by private automobile and an average turnover rate of 5.5 vehicles per space.

Project Trip Generation

Table IV.B-6, Proposed Project Daily, AM and PM Peak Hour Person Trip Generation, summarizes the weekday daily, AM, and PM peak hour trip generation for the proposed project by project component. Overall, the proposed project would generate about 7,346 daily person trips, of which 878 trips would occur during the AM peak hour, and 1,123 trips would occur during the PM peak hour.

TABLE IV.B-6 PROPOSED PROJECT DAILY, AM AND PM PEAK HOUR PERSON TRIP GENERATION

Land Use	Size	Daily	AM Peak Hour	PM Peak Hour
Residential	584 units	4,865	648	842
UA Local 38 Building [a]	27,296 gsf	165	15	14
Retail:				
Restaurant	6,000 gsf	1,200	178	162
General Retail	7,000 gsf	1,050	24	95
Open Space [b]	23,500 gsf	66	13	10
Total Proposed Project		***7,346***	***878***	***1,123***

SOURCE: Fehr & Peers, *SF Guidelines*.

NOTE:

a. The number of AM and PM peak hour trips generated by the new UA Local 38 building was conservatively assumed to be twice the number of trips observed at the existing UA Local 38 building during a given time period. The number of daily trips was extrapolated based on "general office" peak hour factors from the *SF Guidelines*.

b. PM peak hour trips for the open space represent a conservative estimate of park use. The percentage of AM peak hour trips with respect to PM peak hour trips was derived from ITE trip generation rates for city parks (ITE Code 411). The percentage of PM peak hour trips with respect to daily trips was estimated using the weighted average of this ratio for all other land uses at the project site.

Table IV.B-7, Proposed Project Trip Generation by Mode, Weekday AM and PM Peak Hours, summarizes the weekday AM and PM peak hour trip generation by mode for the proposed project.

- During the weekday AM and PM peak hours, about 24 percent of all person-trips would be by auto, 40 percent by transit, 22 percent by walking, and 14 percent by other modes (including bicycling). During the AM peak hour, the proposed project would generate about 177 new vehicle-trips (68 inbound and 109 outbound). During the PM peak hour, the proposed project would generate about 226 new vehicle-trips (136 inbound and 90 outbound).

As shown in **Table IV.B-8, Proposed Project Delivery/Service Vehicle-Trips and Loading Space Demand**, the uses associated with the proposed project would generate about 45 delivery and service vehicle-trips to the project site per day. Overall, for both project components, this corresponds to a demand for three loading spaces during the peak hour of loading activities, and three loading spaces during an average hour of loading activity. It is anticipated that most of the delivery and service vehicles that would be generated by the proposed project would consist of small trucks and vans. In addition, the residential uses would generate a demand for large and small moving vans.

TABLE IV.B-7 PROPOSED PROJECT TRIP GENERATION BY MODE, WEEKDAY AM AND PM PEAK HOURS

Peak Hour/Land Use	Person-Trips					Vehicle Trips
	Auto[a]	Transit[b]	Walk	Other[c]	Total	
AM PEAK HOUR						
Residential	147	305	93	103	648	140
UA Local 38 Building	5	9	1	0	15	4
Retail/Restaurant	58	34	87	23	202	33
Open Space	0	0	13	0	13	0
Total Proposed Project	***210***	***348***	***194***	***126***	***878***	***177***
PM PEAK HOUR						
Residential	191	396	121	134	842	182
UA Local 38 Building	5	8	1	0	14	3
Retail/Restaurant	73	44	111	29	257	41
Open Space	0	0	10	0	10	0
Total Proposed Project	***269***	***448***	***243***	***163***	***1,123***	***226***

SOURCE: Fehr & Peers, *SF Guidelines*.

NOTES:

a. Auto trips are calculated for both single-occupancy vehicle trips and rideshare trips.

b. Transit trips are split between Muni, BART, and all other transit trips.

c. "Other" mode includes bicycles, motorcycles, and taxis.

TABLE IV.B-8 PROPOSED PROJECT DELIVERY/SERVICE VEHICLE-TRIPS AND LOADING SPACE DEMAND

Land Use	Daily Truck Trip Generation	Peak Hour Loading Spaces	Average Hour Loading Spaces
Residential	15	1	1
UA Local 38 Building	6	<1	<1
Retail	2	<1	<1
Restaurant	22	1	1
Total Proposed Project	***45***	***3***	***3***

SOURCE: Fehr & Peers, *SF Guidelines*.

Table IV.B-9, Proposed Project Parking Demand, presents the estimated parking demand for the proposed project based on the *SF Guidelines*. The 584 residential units would generate a parking demand for about 614 spaces during the evening hours, and about 491 spaces during the midday period (i.e., about 80 percent of the overnight demand). The retail/restaurant and UA Local 38 building would generate a parking demand of about 32 spaces during the midday period, and about 14 spaces during the evening period, for a total demand of approximately 571 parking spaces (midday) and 676 parking spaces (evening). As stated above, the results of these calculations may overestimate the actual parking demand generated by the proposed project and therefore are conservative.

TABLE IV.B-9 PROPOSED PROJECT PARKING DEMAND

Period/Project Component/Land Use	Long-Term Parking Spaces	Short-Term Parking Spaces	Total
MIDDAY			
Residential	491	0	491
UA Local 38 Building	10	45	55
Retail/Restaurant	22	3	25
Midday Total	***523***	***48***	***571***
EVENING			
Residential	614	0	614
UA Local 38 Building	10	45	55
Retail/Restaurant	4	3	7
Evening Total	***628***	***48***	***676***

SOURCE: Fehr & Peers, *SF Guidelines*.

NOTE:

The methodology used for estimating parking demand likely overestimates the actual parking demand generated by the proposed project and is therefore conservative.

Project-Level Impact Evaluation

This subsection presents an assessment of VMT, traffic hazards, transit, pedestrian, bicycle, loading, emergency vehicle access, and transportation-related construction impacts generated by the proposed project. A parking demand analysis is presented for informational purposes and considers any secondary physical impacts associated with constrained supply (e.g., queuing by drivers waiting for scarce on-site parking spaces, which affects the public right-of-way).

VMT Impacts

Impact TR-1: The proposed project would not cause substantial additional VMT nor substantially induce automobile travel. (Less than Significant)

VMT Analysis

As described above under Approach to Analysis, for development projects in San Francisco, a project would result in a significant impact related to substantial additional VMT if it would exceed the regional VMT per capita or per employee for the particular land use (i.e., residential, office, or retail) less 15 percent. **Table IV.B-10, Daily VMT per Capita—Existing Conditions**, presents the average daily VMT per capita for the residential, office, and retail land uses for the TAZ within which the proposed project is located, as well as the Bay Area regional average, as obtained from the SF-CHAMP model.

TABLE IV.B-10 DAILY VMT PER CAPITA—EXISTING CONDITIONS

Trip Type (Land Use)	Bay Area Regional Average	Regional Average Minus 15%	TAZ 578[a]
Households (residential)	17.2	14.6	3.7
Employment (office)	19.1	16.2	7.6
Employment (retail)	14.9	12.6	8.9

SOURCE: San Francisco Transportation Authority SF-CHAMP model, 2016.
NOTE:
a. The Traffic Analysis Zone (TAZ) in which the project site is located.

As presented in **Table IV.B-10**, the existing average daily VMT per capita for the TAZ 578, in which the proposed project is located, is substantially below the existing regional average daily VMT:

- For the residential uses, the average daily VMT per capita is 3.7, which is about 78 percent below the existing regional average daily VMT per capita of 17.2;
- For the office uses, the average daily work-related VMT per employee is 7.6, which is about 60 percent below the existing regional average daily work-related VMT per employee of 19.1; and
- For the retail uses, the average daily retail VMT per employee is 8.9, which is about 40 percent below the existing regional average daily retail VMT per employee of 14.9.

Thus, as described above, the project site is located within an area of the city where the existing VMT is more than 15 percent below the regional VMT thresholds, and the proposed project's residential, office, and retail/restaurant land uses would not generate a substantial increase in VMT.[85] Furthermore, the project site meets the Proximity to Transit Stations screening criterion, which also indicates the proposed project's uses would not cause substantial additional VMT.[86]

Induced Automobile Travel Analysis

The proposed project is not a transportation project. However, the proposed project would include features that would alter the transportation network. These features include sidewalk widening, on-street commercial and passenger loading/unloading zones, bicycle parking, and curb cuts. These features fit within the general types of projects identified above that would not substantially induce automobile travel. Therefore, impacts would be ***less than significant***.

Mitigation: None required.

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[85] The Map-Based Screening for Residential, Office, and Retail Projects was applied to the proposed project. The project site is located within TAZ 578, which is within an area of the City where the existing VMT is more than 15 percent below the regional VMT thresholds, as documented in Executive Summary Resolution Modifying Transportation Impact Analysis, Attachment F (Methodologies, Significance Criteria. Thresholds of Significance, and Screening Criteria for Vehicle Miles Traveled and Induced Automobile Travel Impacts), Appendix A (SFCTA Memo), March 3, 2016. Available at http://commissions.sfplanning.org/cpcpackets/Align-CPC%20exec%20summary_20160303_Final.pdf, accessed March 21, 2016.

[86] San Francisco Planning Department, Eligibility Checklist: CEQA Section 21099—Modernization of Transportation Analysis for 1629 Market Street, June 7, 2016.

Traffic Hazard Impacts

Impact TR-2: The proposed project would not cause major traffic hazards. (Less than Significant)

As presented above under the "Significance Thresholds," traffic impacts were assessed based on whether the proposed project would create traffic hazards. In general, the proposed project would add vehicle trips to the surrounding roadways (up to 177 vehicle trips during the AM peak hour and 226 vehicle trips during the PM peak hour); however, a general increase in traffic would not be considered a traffic hazard. For example, traffic hazards generally would result from the introduction of design features such as sharp roadway curves, dangerous intersections, or incompatible uses of roadways, none of which would be caused by the proposed project. As noted above under "Regulatory Framework," automobile delay is no longer used as a significance criterion in San Francisco.

The project site design would accommodate safe and comfortable vehicle access and circulation within, to, and from the proposed project. The proposed project would include two driveways, one on Brady Street (19 feet wide) and one on Stevenson Street (24 feet wide), that would provide access to the two-level, below-grade garage, and would accommodate two-way travel for vehicles entering and exiting the garage. Vehicles using the Brady Street driveway could travel either north or south upon exiting onto Brady Street. Vehicles using the Stevenson Street driveway would exit the driveway and travel eastbound on Stevenson Street to a t-intersection with 12th Street, where vehicles could travel either north or south on 12th Street. Vehicles would have sufficient sight distance when entering or exiting the proposed project on either Brady Street or 12th Street, as there are no buildings, curves, or hills on these streets that would limit the driver's view. The proposed streetscape designs for 12th Street would not inhibit sight distance for vehicles entering or exiting the proposed project from or onto 12th Street, and it would include gradual rather than sharp curves. Proposed street trees would follow best practices for siting near intersections (e.g., greater than 25 feet from intersections) and would therefore not interfere with visibility.

In summary, the proposed project would not cause traffic hazards, and therefore, proposed project impacts related to traffic hazards would be ***less than significant***.

While the proposed project's impacts on traffic hazards would be less than significant, **Improvement Measures I-TR-2a, Monitoring and Abatement of Queues** and **I-TR-2b, Notification at Driveway**, would further reduce the less-than-significant impacts related to potential conflicts between vehicles accessing the proposed project and bicyclists, pedestrians, and transit. Monitoring and abatement of queues and notification at the two driveway entrances would decrease potential conflicts between pedestrians and vehicles. Thus, **Improvement Measures I-TR-2a** and **I-TR-2b** would further reduce the proposed project's ***less-than-significant*** impacts related to traffic hazards.

As noted under "Regulatory Framework," the City established a citywide TDM Program. *Planning Code* amendments to implement the TDM Program were approved by the Board of Supervisors on February 7, 2017, and signed by the Mayor on February 17, 2017 (Ordinance 34-17). This ordinance added *Planning Code* Section 169, Transportation Demand Management; *Planning Code* Section 169.6 gives the Planning Commission authority to establish and amend TDM Program Standards, which define the specifics of the TDM Plans required under Section 169. The proposed project would be subject to the requirements of the TDM Program

and the project sponsor has agreed to implement a number of TDM Measures, which are identified in Section II.D, Proposed Project Characteristics, of the *Project Description*.

Improvement Measures

Improvement Measure I-TR-2a – Monitoring and Abatement of Queues. As an improvement measure to reduce the potential for queuing of vehicles accessing the project site, it should be the responsibility of the project sponsor to ensure that recurring vehicle queues or vehicle conflicts do not occur adjacent to the site. A vehicle queue is defined as one or more vehicles blocking any portion of adjacent sidewalks or travel lanes for a consecutive period of three minutes or longer on a daily and/or weekly basis.

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

Suggested abatement methods include, but are not limited to the following: redesign of facility to improve vehicle circulation and/or on-site queue capacity; employment of parking attendants; installation of LOT FULL signs with active management by parking attendants; use of valet parking or other space-efficient parking techniques; use of off-site parking facilities or shared parking with nearby uses; use of parking occupancy sensors and signage directing drivers to available spaces; travel demand management strategies as discussed in the **Transportation Demand Management (TDM) Program** in the project description; and/or parking demand management strategies such as parking time limits, paid parking, time-of-day parking surcharge, or validated parking.

If the Planning Director, or his or her designee, determines that a recurring queue or conflict may be present, the Planning Department should notify the project sponsor, successor owner/operator or garage operator, as applicable, in writing. Upon request, the owner/operator should hire a qualified transportation consultant to evaluate the conditions at the site for no less than seven days. The consultant should prepare a monitoring report to be submitted to the Planning Department for review. If the Planning Department determines that a recurring queue or conflict does exist, the project sponsor should have 90 days from the date of the written determination to abate the recurring queue or conflict, to the satisfaction of the Planning Department.

Improvement Measure I-TR-2b – Notification at Driveway. The Project Sponsor should provide visible/audible warning notification at the two driveway entrances to alert pedestrians to vehicles entering and exiting the driveway. Signage should be installed inside and outside the garage entrances, directing drivers to proceed with caution. Conditions at the driveways should be monitored during project occupancy to determine whether an additional audible warning signal(s) or detectible warning surfaces are necessary to supplement the visible warning signal. The final site design will ensure the proposed project driveways are designed appropriately for the visually impaired.

Mitigation: None required.

Transit Impacts

Impact TR-3: The proposed project would not result in a substantial increase in transit demand that could not be accommodated by adjacent local and regional transit capacity, or cause a substantial increase in delays or operating costs such that significant adverse impacts to local or regional transit service could occur. (Less than Significant)

Capacity Utilization Analysis

The proposed project would generate about 447 transit trips during the PM peak hour. No trip credit was assumed for transit trips generated by the existing uses on the project site. Based on the location of the project site and the origins and destinations of the residents, employees and visitors of the proposed project, under existing plus project conditions, it was assumed that 318 of the 447 PM peak hour transit trips would be local trips within San Francisco during the PM peak hour. The 129 regional transit trips are assumed to take BART at the Civic Center station, Golden Gate Transit routes on Van Ness Avenue, and Muni routes to other regional transit providers (SamTrans, AC Transit, and Caltrain).

The proposed project's contribution to transit impacts would be larger during the PM peak hour than during the AM peak hour.[87] In addition, while transit ridership under the AM peak hour is at times high, the PM peak hour reflects maximum capacity conditions overall. Therefore, this study examines PM peak-hour transit conditions quantitatively, with a qualitative discussion of AM peak-hour transit conditions.

Muni Corridors and Downtown Screenlines

Table IV.B-11, Muni Downtown Screenline Analysis, Existing plus Project Conditions—Weekday PM Peak Hour, presents the Muni downtown screenline analysis for existing plus project conditions for weekday PM peak hour. As shown in the table, with the addition of the proposed project-generated transit trips, the transit screenlines and corridors would operate within Muni's capacity utilization standard. Of the 318 transit trips within San Francisco generated by the proposed project, only 137 transit trips would cross the downtown transit screenlines in the outbound direction during the PM peak hour; transit trips that do not cross the downtown transit screenline are not shown in the table. The addition of proposed project transit trips would not cause Muni screenlines to exceed the SFMTA 85 percent operating threshold. Two route bundles—Fulton/Hayes and T Third—exceed the SFMTA 85 percent operating threshold under existing conditions. The addition of proposed project trips to these route bundles would contribute less than five percent of ridership on those route bundles. Therefore, the proposed project's impact to Muni transit capacity would be ***less than significant***.

[87] The proposed project would generate about 348 transit trips during the AM peak hour.

TABLE IV.B-11 MUNI DOWNTOWN SCREENLINE ANALYSIS, EXISTING PLUS PROJECT CONDITIONS—WEEKDAY PM PEAK HOUR

Screenline/Corridor	Existing Ridership	Project Trips	Existing plus Project Ridership	Capacity	Capacity Utilization
Northeast					
Kearny/Stockton	2,245	6	2,251	3,327	68%
Other	683	0	683	1,078	63%
Subtotal	*2,928*	*6*	*2,934*	*4,405*	*67%*
Northwest					
Geary	1,964	2	1,966	2,623	75%
California	1,322	0	1,322	1,752	75%
Sutter/Clement	425	0	425	630	67%
Fulton/Hayes	1,184	3	1,187	1,323	**90%**
Balboa	625	2	627	974	64%
Subtotal	*5,519*	*7*	*5,526*	*7,302*	*76%*
Southeast					
Third	782	0	782	793	**99%**
Mission	1,407	3	1,410	2,601	54%
San Bruno/Bayshore	1,536	3	1,539	2,134	72%
Other	1,084	0	1,084	1,675	65%
Subtotal	*4,810*	*6*	*4,816*	*7,203*	*67%*
Southwest					
Subway	4,904	98	5,002	6,164	81%
Haight/Noriega	977	14	991	1,554	64%
Other	555	6	561	700	80%
Subtotal	*6,435*	*118*	*6,553*	*8,418*	*78%*
Total All Screenlines	***19,692***	***137***	***19,829***	***27,328***	***73%***

SOURCE: SF Planning Department, Fehr & Peers, 2017.
NOTE:
Bold indicates capacity utilization greater than the Muni 85 percent capacity utilization standard.

Regional Screenlines

Similar to Muni, the analysis of regional transit screenlines assess the effect of project-generated transit-trips on transit conditions in the outbound direction (i.e., away from downtown San Francisco and the project site) during the weekday PM peak hour. Based on the origins/destinations of the transit trips generated by the proposed project, the regional transit trips were assigned to the three regional transit screenlines. **Table IV.B-12, Regional Transit Screenline Analysis, Existing plus Project Conditions—Weekday PM Peak Hour**, presents the existing plus project screenline analysis for the regional transit carriers for the PM peak hour.

TABLE IV.B-12 REGIONAL TRANSIT SCREENLINE ANALYSIS, EXISTING PLUS PROJECT CONDITIONS—WEEKDAY PM PEAK HOUR

Screenline/Operator	Existing Ridership	Project Trips	Existing plus Project Ridership	Capacity	Capacity Utilization
East Bay					
BART	24,488	14	24,502	22,784	**108%**
AC Transit	2,256	3	2,259	3,926	58%
Ferries	805	1	806	1,615	50%
Subtotal	*27,549*	*18*	*27,567*	*28,325*	*97%*
North Bay					
GGT buses	1,384	5	1,389	2,817	49%
GGT ferries	968	1	969	1,959	49%
Subtotal	*2,352*	*6*	*2,358*	*4,776*	*49%*
South Bay					
BART	13,500	13	13,513	18,900	71%
Caltrain	2,377	7	2,384	3,100	77%
SamTrans	141	2	143	320	45%
Subtotal	*16,018*	*22*	*16,040*	*22,320*	*72%*
Total All Screenlines	***45,919***	***46***	***45,965***	***55,421***	***83%***

SOURCE: SF Planning Department, Fehr & Peers.
NOTE:
Bold indicates capacity utilization greater than the regional operator 100 percent capacity utilization standard.

The proposed project would add 129 regional transit trips, 46 of which would be in the outbound direction during the PM peak hour and would cross the regional screenlines on routes shown in **Table IV.B-12**. Proposed project-generated trips represent less than one percent of existing regional transit ridership and would not cause regional transit screenlines to operate over their established 100 percent capacity utilization thresholds or contribute significantly to the regional screenlines operating above the established capacity utilization threshold under existing conditions. Therefore, these project contributions to regional screenlines would be ***less than significant***.

Mitigation: None required.

Pedestrian Impacts[88]

Impact TR-4: The proposed project would not result in substantial overcrowding on public sidewalks, and would not create potential hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas. (Less than Significant)

Primary pedestrian access to the residential units in Buildings A and B would be via Brady Street, and secondary pedestrian access would be via Market Street. Primary pedestrian access to Building C (Civic Center Hotel) would be via 12th Street, and secondary pedestrian access would be via Market Street. Primary pedestrian access to Building D and the Colton Street Affordable Housing building would be via Colton Street, and secondary access would be via Stevenson Street.

Pedestrian trips generated by the proposed project would include walk trips to and from nearby commercial and office uses, as well as walk trips to and from the local and regional transit stops. Overall, the proposed project would add 542 pedestrian trips (i.e., 194 walk trips and 348 transit trips) to the surrounding streets during the weekday AM peak hour, and 689 pedestrian trips (i.e., 242 walk trips and 447 transit trips) to the surrounding streets during the weekday PM peak hour. These new pedestrian trips would be spread out over several adjacent sidewalks and crosswalks. Most pedestrian trips would occur along Market Street and Van Ness Avenue to access nearby transit stops on Market Street, Van Ness Avenue, Haight Street, and 11th Street. Pedestrian volumes around the proposed project are moderately high on Market Street and Van Ness Avenue due to the existing transit service, and pedestrian volumes are relatively lower along other streets surrounding the project site such as Brady, 12th, and Otis Streets.

With the exception of Otis Street (as previously described), the sidewalks in the vicinity of the project site currently meet *Better Streets Plan* minimum sidewalk widths, and there are no existing crowding issues, even on the busier streets. The pedestrian trips generated by the proposed project on surrounding sidewalks would not be enough to cause overcrowding of the sidewalk such that hazards could occur.

Several streets near the project site are designated as part of the Vision Zero High Injury Network (i.e., Market Street, Van Ness Avenue, South Van Ness Avenue, Gough Street, and Mission Street). Two Vision Zero priority projects are planned at high-injury locations near the project site. The 14 Mission Rapid Project would improve pedestrian conditions along Otis and Mission Streets, and pedestrian safety improvements are planned along Market Street at Octavia Boulevard.

Per *Planning Code* Section 138.1, a project sponsor is required to submit a streetscape plan illustrating the location and design of streetscape improvements appropriate to the street type, including site furnishings, landscaping, curb ramps, corner curb extensions, and sidewalk widening as appropriate. This *Planning Code* section applies to both the proposed project and the proposed 10 South Van Ness project (across 12th Street from the project site). Given that both projects would have frontages on 12th Street, the two sponsors have developed a joint

[88] See discussion of potential wind impacts on pedestrians under Topic E.8, *Wind and Shadow*, in the Initial Study (Appendix A of this EIR).

streetscape plan proposal for this street segment and will continue to coordinate further refinements to the proposal.[89]

Two streetscape alternatives have been proposed for 12th Street: a Base Case Streetscape Plan and an Enhanced Streetscape Plan. The Base Case plan is generally consistent with the streetscape design guidance provided in the Market & Octavia Area Plan. In this alternative, two-way vehicle traffic would be maintained on 12th Street, and sharrows would be painted in both vehicle travel lanes.[90] There would be four on-street loading zones, which would include designated space for ADA loading and parking, as well as for passenger and freight loading. The Enhanced Streetscape Plan would maintain two-way vehicle travel along 12th Street, potentially as a shared street with a curbless roadway.[91] Sharrows would be painted in both vehicle travel lanes. There would be three loading zones, which would include designated space for ADA loading and parking as well as for passenger and freight loading. The project sponsor would coordinate with SFMTA and other City agencies to align the proposed 12th Street streetscape plans with the Market Street Hub Project designs for 12th Street.

The proposed project's streetscape design (two alternatives currently under consideration) minimizes potential hazards for pedestrians accessing the project site. Both the Base Case and Enhanced Plan for the 12th Street streetscape plan would improve pedestrian conditions along the roadway segment. The Base Case would include a raised crosswalk across 12th Street at Stevenson Street, and the Enhanced Plan would convert all of 12th Street into a raised, shared roadway, slowing vehicle traffic and making pedestrian travel safer and more comfortable along the roadway. The proposed project would maintain existing sidewalk widths on Brady, Colton, and Market Streets immediately surrounding the project site and would provide streetscape improvements along 12th Street to widen sidewalks, add street trees, and add bulbouts at the corner of Market and 12th Streets, as well as at the corner of 12th and Stevenson Streets. The Base Case streetscape plan for 12th Street would include 21-foot-wide pedestrian zones on both sides of the street, including a four-foot-wide frontage zone, eight-foot-wide sidewalk, and nine-foot-wide furnishing zone. The Enhanced Plan for 12th Street would include a 40-foot-wide pedestrian zone on the east side of the street and an 18-foot-wide pedestrian zone on the west side of the street. The 40-foot-wide pedestrian zone would include a six-foot-wide sidewalk along the drive lane, a 25-foot-wide promenade area for vendors and seating, and a nine-foot-wide sidewalk adjacent to 10 South Van Ness. The 18-foot-wide pedestrian zone would include four-foot-wide buffer zones adjacent to the proposed project and drive lane, and a 10-foot-wide sidewalk between the buffer zones. Both designs would include a small plaza on the northwest corner of the intersection of 12th Street/Mission Street/Otis Street/South Van Ness Avenue. The streetscape improvements would allow for comfortable circulation for pedestrians in and around the project site.

The proposed project would provide an improvement to the pedestrian environment in the neighborhood by removing seven curb cuts on the perimeter of the project site (four curb cuts on Colton Street, two curb cuts on

[89] The proposed development at 30 Otis Street would also have a frontage on 12th Street. This proposed project is in preliminary planning stages, and the City has requested that its streetscape plan be consistent with the plan ultimately developed by the City in collaboration with the sponsors of the 10 South Van Ness project and the proposed project.

[90] A sharrow is a pavement marking showing a bike and chevron within the travel lane to indicate that bicyclists and vehicles share the travel lane. Sharrows are used on Class 3 bicycle facilities, and are intended to help bicyclists position themselves better within the lane (outside the door zone) and to alert drivers that bicyclists may be present.

[91] A shared street is typically a low-volume residential street where pavement is flush with the curb to reinforce the pedestrian-priority nature of the street. Shared streets can meet the desires of adjacent residents and function foremost as a public space for recreation, socializing, and leisure. Street furniture, including bollards, benches, planters, and bicycle parking can help define a shared space, subtly delineating the traveled way from the pedestrian-only space.

12th Street, and one curb cut on Market Street). The proposed project would include two driveways across the existing sidewalks: one 19-foot-wide driveway along Brady Street that would use an existing curb cut, and one driveway on Stevenson Street at 12th Street that would require a new 20-foot-wide curb cut.[92] An additional 24-foot-wide curb cut would be created on Stevenson Street, approximately 140 feet west of the intersection of Stevenson and 12th Streets, which would provide access to the two-level vehicle parking garage located under Buildings A and B. The proposed project would also include the creation of publicly-accessible open space, which would be a pedestrian amenity.

The proposed project would not create substantial potential collision risks through increased vehicle conflicts or inadequate sight distance for pedestrians, or otherwise interfere with pedestrian accessibility to the project site and adjoining areas. Overall, pedestrian facilities surrounding the project site are generally adequate. Therefore, the proposed project's impact to pedestrian circulation and facilities would be ***less than significant***. While the proposed project's impact to pedestrian circulation and facilities would be less than significant, **Improvement Measures I-TR-2a, Monitoring and Abatement of Queues**, and **I-TR-2b, Notification at Driveway**, would further reduce the less-than-significant impacts related to potential conflicts between vehicles accessing the proposed project and pedestrians.

Mitigation: None required.

Bicycle Impacts[93]

Impact TR-5: The proposed project would not result in potentially hazardous conditions for bicyclists, or otherwise substantially interfere with bicycle accessibility to the site and adjoining areas. (Less than Significant)

In total, the proposed project would provide 231 Class 1 and 42 Class 2 bicycle parking spaces.[94,95]

- **Residential and Retail/Restaurant Component Class 1 Bicycle Parking Spaces**—A total of 225 Class 1 bicycle parking spaces would be provided for the residential and retail/restaurant uses.
- **UA Local 38 Component Class 1 Bicycle Parking Spaces**—A total of six Class 1 bicycle parking spaces, two showers, and 12 lockers would be provided.

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[92] Stevenson Street is a public alley.

[93] See discussion of potential wind impacts on bicyclists under Topic E.8, *Wind and Shadow*, in the Initial Study (Appendix A of this EIR).

[94] Per *San Francisco Planning Code* Section 155.1, Bicycle Parking Definitions and Standards, Class 1 bicycle parking facilities are spaces in secure, weather-protected facilities intended for use as long-term, overnight, and workday bicycle storage by dwelling unit residents, non-residential occupants, and employees. Class 2 spaces are bicycle racks located in publicly-accessible, highly visible location intended for transient or short-term use by visitors, guests, and patrons to the building or use. Class 2 bicycle racks allow the bicycle frame and one wheel to be locked to the rack (with one u-shaped lock), and provide support to bicycles without damage to the wheels, frame, or components.

[95] Per *Planning Code* Section 155.2, the proposed project would be required to provide 221 Class 1 and 29 Class 2 bicycle parking spaces for the 584 dwelling units, two Class 1 and 11 Class 2 spaces for the retail/restaurant uses, and six Class 1 and two Class 2 spaces for the UA Local 38 uses, for a total of 229 Class 1 and 42 Class 2 bicycle parking spaces. Because the proposed project would provide 231 Class 1 and 42 Class 2 bicycle parking spaces, the proposed project would meet the *Planning Code* requirements for Class 2 spaces, and exceed the requirements for Class 1 spaces. In addition, the proposed project would be required to provide two showers and 12 lockers for the UA Local 38 building, and the proposed project would meet these requirements.

- **Class 2 Bicycle Parking Spaces**—In addition to the Class 1 bicycle parking spaces provided within the project garages, a total of 42 Class 2 bicycle parking spaces in bicycle racks would be provided along the proposed project frontages on Brady, Market, and 12th Streets, as well as on the Brady Open Space.

The residential section of Building A of the proposed project would include a bicycle storage room with 92 Class 1 bicycle parking spaces on the west side of the first basement level. The bicycle storage room would be accessed from Brady Street through an elevator in the north lobby. The residential section of Building B of the proposed project would include a bicycle storage room with 37 Class 1 bicycle parking spaces on the lower lobby, on the west side of the building. The bicycle storage room would be accessed from Stevenson Street through the UA Local 38 building courtyard and an elevator in the building. Building C (Civic Center Hotel) would include a bicycle storage room on the basement level with 15 Class 1 bicycle parking spaces. The bicycle storage room would be accessed from Stevenson Street through the UA Local 38 building courtyard and a ramp in the building. The UA Local 38 building would include a bicycle storage room with six Class 1 bicycle parking spaces on the north side of the first basement level. The bicycle storage room would be accessed from Market Street through the staircase on the north side or the elevator on the south side of the building. Building D of the proposed project would include a bicycle storage room with 40 Class 1 bicycle parking spaces on the west side of the first basement level. The bicycle storage room would be accessed from the Brady Open Space through a staircase or an elevator located in the center of the building. The Colton Street Affordable Housing building would include a bicycle storage room with 41 Class 1 bicycle parking spaces on the north side of the building. The bicycle storage room would be accessed from Colton Street through a staircase or an elevator located in the center of the building.

The project site is within convenient bicycling distance of other office and retail buildings in the Civic Center and downtown San Francisco, and residential neighborhoods to the north, west and south of the project site. As such, it is anticipated that a substantial portion of the "other" trips generated by the proposed project would be bicycle trips. There are a number of bicycle routes in the project vicinity (see **Table IV.B-2, Muni Service in Project Vicinity—Weekday Frequency**, p. IV.B-7). Although the proposed project would result in an increase in the number of vehicles in the vicinity of the project site (up to 177 vehicle trips during the AM peak hour and 226 vehicle trips during the PM peak hour), this increase would not be substantial enough to adversely affect bicycle facilities in the area.

While Market Street is a Vision Zero High Injury Corridor, the proposed project's streetscape design minimizes impacts for bicyclists accessing the project site. No new curb cuts or other substantial alterations are proposed along the project site's Market Street frontage. On 12th Street, both the Base Case and Enhanced Plan streetscape designs would include sharrows. Bicyclists traveling from the proposed project to downtown San Francisco would turn right from 12th Street onto Market Street, into the green protected bicycle lane. Bicyclists accessing the proposed project from Market Street southwest of the project site would approach on the raised bikeway between Gough Street and 12th Street. While bicycle infrastructure is not planned for Brady Street, this segment experiences low vehicle traffic that would pose minimal risks to cyclists.

The proposed project would not increase auto or bicycle traffic to a level that adversely affects existing bicycle facilities in the area; nor would the proposed project create a new hazard or substantial conflict with bicycling. The proposed project would not adversely affect bicycle accessibility to the project site or adjoining areas. Thus, the proposed project's impact to bicycle facilities and circulation would be considered ***less than significant***.

Mitigation: None required.

Loading Impacts

Impact TR-6: The proposed project would not result in a loading demand that could not be accommodated within the proposed on-site loading facilities or within convenient on-street loading zones, and would not create potentially hazardous conditions for traffic, transit, bicyclists, or pedestrians, or significant delays to transit. (Less than Significant)

Proposed Project Supply. The proposed project would be served by eight proposed loading zones and spaces, including three on-street loading zones that the project sponsor would request be designated for loading by the SFMTA and five off-street loading spaces. Proposed loading zones or spaces include:

- **Brady Street:** One 60-foot-long on-street loading zone adjacent to Building A, and one 40-foot-long on-street loading zone on the west side of Brady Street across from the proposed Brady Open Space. Reconfiguration and/or relocation of the curb ramp from the north end to the south end of the 60-foot loading zone and the relocation of the 40-foot loading zone to the east side of Brady Street may be considered in the final design process.
- **12th Street:** One 100-foot-long on-street loading zone adjacent to Building C (the Civic Center Hotel).
- **Stevenson Street:** One off-street, 25-foot-long designated move-in/move-out space located just off Stevenson Street, adjacent to Building D.
- **Building A:** Two 20-foot-long off-street loading spaces in the below-grade garage (vertical clearance 10 feet).
- **Building B:** Two 20-foot-long off-street loading spaces in the below-grade garage (vertical clearance 10 feet).

A loading zone in front of the Colton Street Affordable Housing building would not be included. A loading zone at that building would require that trucks back down Colton Street until they reach Brady Street because there would be no egress from Colton Street, and the street width is too narrow for large trucks to turn around. Additionally, having trucks back down Colton Street would not be ideal, given the narrow width of Colton Street and the potential for collision with parked cars and other traffic on Colton Street. The Colton Street Affordable Housing building would be comprised of fully-furnished housing units, and the demand for deliveries and move-in/move-out operations is expected to be substantially less than that at other buildings in the proposed project.

During the preparation of the transportation impact analysis for the proposed project, the Planning Department and project sponsor preliminarily consulted with the SFMTA regarding the necessity for, and location of, loading zones to accommodate future long-term demands for curbside space as a result of the proposed project, including demand to accommodate passenger pick up and drop off related to for-hire vehicles. The project sponsor would work with SFMTA to request suitable loading zones adjacent to the project site and would coordinate with City staff to align the on-street 12th Street loading zone with the Market Street Hub Project designs for 12th Street. Proposed loading zones would need to be approved by the SFMTA Color Curb Program. The project sponsor would submit a formal application to SFMTA at least 60 days prior to curb completion, with the application plan set showing landscaping kept clear of the sidewalk adjacent to the loading zones.

Loading Demand vs. Supply. As shown in **Table IV.B-8, Proposed Project Delivery/Service Vehicle-Trips and Loading Space Demand**, the proposed project would generate demand for about 45 daily delivery and service vehicle-trips, three loading spaces during an average hour, and three loading spaces during the peak hour. Sufficient loading space would be provided to accommodate loading demand at the project site.

Commercial loading demand could include parcel and supplies delivery. These deliveries are usually of short duration and would not substantially affect conditions around the project site. Passenger loading has been designated for each building on the project site. The following list summarizes how the proposed loading zones would serve the individual buildings on the project site.

- **Building A:** Retail and residential passenger loading and delivery loading would use the designated loading area on Brady Street, adjacent to Building A. Freight delivery would use the designated loading area on Brady Street, adjacent to Building A, and the two designated loading spaces in the Building A garage. Move-in/move-out operations would use the two designated loading spaces in the Building A garage.
- **Building B:** Retail and residential passenger loading and delivery loading would use the designated loading area on 12th Street, adjacent to Building C (Civic Center Hotel). The Building B lobby would be located on the east side of the building and accessed through a shared courtyard with its entrance on Stevenson Street. This would encourage all Building B delivery vehicles to load on 12th Street and use the Stevenson Street entrance instead of loading on Brady Street. Freight delivery would use the designated loading area on 12th Street, adjacent to Building C, and by the two designated loading spaces in the Building B garage. Move-in/move-out operations would use the two designated loading spaces in the Building B garage.
- **UA Local 38 Building:** Passenger loading and delivery loading would use the designated loading area on 12th Street, adjacent to Building C (Civic Center Hotel).
- **Building C (Civic Center Hotel):** Retail and residential passenger loading and delivery loading would use the designated loading area on 12th Street, adjacent to Building C. Move-in/move-out operations would use the designated loading area on 12th Street, adjacent to Building C.
- **Building D:** Residential passenger loading and delivery loading would use the designated loading area on 12th Street, adjacent to Building C (Civic Center Hotel). Move-in/move-out operations would use the designated move-in/move-out space on the Building D property, accessed off Stevenson Street.
- **Colton Street Affordable Housing Building:** Residential passenger loading and delivery loading would use the designated loading areas on Brady Street, adjacent to the Brady Open Space. Move-in/move-out operations would use the designated loading area on Brady Street, adjacent to the Brady Open Space. The Colton Street Affordable Housing building is comprised of fully-furnished housing units. Thus, move-in/move-out operations would be far less cumbersome than typical move-ins/move-outs and would require smaller truck sizes.

Loading Code Requirement vs. Supply. Based on the *Planning Code* (Section 152), three off-street loading spaces would be required for the residential and UA Local 38 portions of the proposed project, and one off-street loading space is required for the combined restaurant/retail uses. The proposed project would meet *Planning Code* quantity requirements by providing four off-street loading spaces that may be used for deliveries. However, four of the five off-street loading spaces would not meet the *Planning Code* length requirements, as discussed below. The on-street loading zones that the sponsor would request be designated by the SFMTA to supplement the off-street loading would address the dimension limitations of the off-street loading spaces.

Residential loading demand would typically be generated when tenants move in and out of the building. The proposed project is expected to have an average of approximately four to seven move-ins/move-outs per week. The Buildings A and B parking garages would accommodate clearances, turning radii and loading spaces sufficient for a truck of up to 20 feet long. Due to the tight turning radii caused by the narrowness of both Brady and Stevenson Streets, it is not possible for larger trucks to make the turns in and out of the proposed project's garages. Because the garages' entrances cannot meet San Francisco's requirements for 25-foot-long and 35-foot-long loading spaces, the off-street loading spaces were designed to be 20'L x 8'W x 10'H to meet the minimum dimensions in *Planning Code* Section 154.b.3 (20'L x 8'W x 7'H). A 20-foot-long moving truck is the recommended standard for up to three-bedroom households, and therefore, would provide sufficient capacity to move in or out of any unit in the project.

To the extent that move-ins/move-outs or freight deliveries exceed the garages' maximum clearances, the proposed loading spaces on Brady and 12th Streets would be utilized. A 25-foot-long move-in/move out loading space would also be provided adjacent to Building D. For any loading activities that require a truck larger than 40 feet in length, building management would obtain a reserved curbside permit from SFMTA for 12th Street in advance.

Loading Vehicle Circulation. The Buildings A and B parking garages connect on the first level. Thus, trucks would have the ability to enter on one side (i.e., Brady Street) and exit on the other (i.e., 12th Street). Trucks would cross Brady Street to enter the Building A garage straight from Stevenson Street west of the project site, given the restricted turn from Brady Street. Trucks would enter the Building B garage by turning off Stevenson Street via 12th Street. The turn from Stevenson Street into and out of the Building B garage can accommodate trucks up to 25 feet long, although the off-street loading spaces could accommodate trucks only up to 20 feet long. Because Stevenson Street offers more-generous turning capacity, signage would be posted at all garage loading areas directing trucks to exit out of the Stevenson Street/12th Street garage. Larger trucks (maximum dimensions 25 feet by eight feet) could enter and exit off Stevenson Street. Composite passenger vehicles (maximum dimensions 15 feet by 5.5 feet) could enter and exit the Building A garage off Brady Street.

The proposed loading zones would accommodate passenger loading and service delivery at all buildings at the project site. Loading procedures for residential tenants, retail visitors, and freight deliveries would reduce conflicts with vehicle traffic and other modes within the vicinity of the project site. Therefore, the proposed project would have a ***less-than-significant*** impact on loading.

Trash, Recycling, and Compost Pick-Up. The proposed project's trash and recycling areas would be located in three rooms: two on basement level one and one on basement level two. For Building A, garbage collected from the retail portion and from the basement trash room would be brought to Brady Street for pick-up. Garbage from the basement trash room would be moved to Brady Street via the freight elevator along the Brady Street frontage. For Building B, garbage collected from the retail portion would be staged on Market Street, while garbage from the basement trash room would be staged on 12th Street. For Building C (Civic Center Hotel), garbage collected from the retail portion and basement trash room would be staged on 12th Street, while garbage from the UA Local 38 building would be staged on Market Street. For Building D, garbage would be staged on 12th Street. Recology would pick up garbage generated by the Colton Street Affordable Housing building at 53 Colton Street from the building's trash room.

Issues of the specific trash collection locations along the project site frontages, who is responsible for moving trash from the trash rooms to the designated pick-up locations, how frequently trash will be collected, and the establishment of no-parking zones during trash pick-up times will be determined through final project design. On-street loading zones would be used for trash staging. The project sponsor will coordinate with Recology on garbage and recycling pick-up, in particular with respect to trash staging and limiting conflicts with delivery services.[96]

Although the proposed project would not cause any new significant loading impacts, **Improvement Measures I-TR-6a, Consolidated Service Deliveries**, and **I-TR-6b, Managed Move-In/Move-Out Operations**, could be implemented to further decrease these ***less-than-significant*** impacts with regard to freight deliveries and moving trucks in the proposed project vicinity:

Improvement Measures

Improvement Measure I-TR-6a – Consolidated Service Deliveries. Building management should work with delivery providers (UPS, FedEx, DHL, USPS, etc.) to coordinate regular delivery times and appropriate loading locations for each building, and retail tenants should be required to schedule their deliveries. The Project Sponsor will evaluate the benefits of consolidating residential deliveries for the market-rate buildings by providing package storage in the buildings that front a loading zone as a potential way to discourage short-term parking on Market Street. Management should instruct all delivery services that trucks bound for the project site are not permitted to stop on Market Street, to encroach in the transit-only or bicycle lanes on Market Street, or to impede the movement of transit vehicles, other vehicles or bicycles by restricting access to the right-turn-only lane on Market Street at 12th Street. Delivery service providers should be strongly encouraged to comply with the project site's loading procedures.

Improvement Measure I-TR-6b – Managed Move-In/Move-Out Operations. Building management should be responsible for coordinating and scheduling all move-in/move-out operations. To the extent possible, such operations requiring the use of on-street loading zones would occur during after-hours and on weekends. Tenants would be strongly encouraged to comply with building move-in/move-out operations.

Mitigation: None required.

Emergency Vehicle Access Impacts

Impact TR-7: The proposed project would not result in significant impacts on emergency vehicle access. (Less than Significant)

Emergency vehicles would continue to access the project site via Van Ness Avenue, Market Street, Gough Street, Otis Street, Mission Street, and surrounding streets. Seven fire access locations have been proposed by the project sponsor: along Market Street between Building A and Building B, at the end of Stevenson Street adjacent to the parking garage, along 12th Street adjacent to Building C (Civic Center Hotel), along Brady Street between

[96] The project sponsor had an initial discussion with Federico Ghilarducci at Recology on December 27, 2016. During the conversation, Recology confirmed that the garbage/recycling pick-up plan studied in this report would align with their collection procedures.

Building A and the proposed open space, along the path between Building B and Building D, along Colton Street in front of the Colton Street Affordable Housing building, and at the terminus of Colton Street east of the Colton Street Affordable Housing building.

The fire access location on Brady Street would be accessed via Otis Street, as Brady Street is one-way northbound north of Stevenson Street. San Francisco fire trucks would be able to turn comfortably from Otis Street onto Brady Street. Fire trucks could exit the project site by traveling north from Brady Street onto Market Street.

The fire access location on Stevenson Street would be accessed via 12th Street. Fire trucks would make either a left or a right turn onto Stevenson Street. Similar to today, San Francisco fire trucks would need to mount the curb when turning onto and off of Stevenson Street. Fire trucks exiting the project site from this location would drive backwards along Stevenson Street back to 12th Street.

The fire access locations on Colton Street would be accessed via Stevenson Street. Fire trucks would turn from 12th Street onto Stevenson Street, then mount the curb at the end of the dead end. Fire trucks may travel along the "fire access route" in the Brady Open Space to arrive at the fire access locations on Colton Street. Fire trucks exiting the project site from this location would drive backwards along Colton Street until the front of the truck is positioned at the "fire access route." The trucks would then exit via the same route they entered, traveling forward onto Stevenson and 12th Streets. While San Francisco fire trucks are capable of mounting the curb to turn onto Colton Street from Brady Street, there is a fire hydrant on the southeast corner of this intersection, which would impede emergency vehicle access from this direction. The proposed project would not inhibit emergency access to the project site; therefore, the proposed project's impacts on emergency vehicle access would be ***less than significant***.

Mitigation: None required.

Construction Impacts

Impact TR-8: The proposed project construction activities would not result in substantial interference with transit, pedestrian, bicycle, or vehicle circulation and accessibility to adjoining areas, and would not result in potentially hazardous conditions. (Less than Significant)

Construction of the proposed project is planned to occur in two sequential phases between March 2018 and November 2021. Phase 1 would include construction of the Colton Street Affordable Housing building, the new UA Local 38 building, and Building D, all of which would be located on existing surface parking lots. In addition, Building A, including the two-level, below-grade parking garage would also be constructed during Phase 1 (March 2018 through January 2020). Phase 2 construction (January 2020 through November 2021) would entail demolition of the existing UA Local 38 building and the construction of Building B and its below-grade parking garage, and the rehabilitation of the Building C (Civic Center Hotel).

The construction impact assessment is based on currently available information from the project sponsor and requirements that are part of the City's permitting process and regulations. Prior to construction, as part of the building permit process, the project sponsor and construction contractor(s) would be required to meet with Public Works and SFMTA staff to develop and review truck routing plans for demolition, disposal of excavated materials, materials delivery and storage, as well as staging for construction vehicles. The construction

contractor would be required to comply with the City of San Francisco's Regulations for Working in San Francisco Streets, (the Blue Book), including those regarding sidewalk and lane closures, and would meet with SFMTA staff to determine if any special traffic permits would be required.[97] In addition to the regulations in the Blue Book, the contractor would be responsible for complying with all city, state, and federal codes, rules and regulations. The project sponsor would be responsible for reimbursing the SFMTA for all temporary striping and signage during project construction.

Construction staging for Phases 1 and 2 of construction would occur in the proposed Brady Open Space portion of the project site and may also occur on a portion of Stevenson Street. The Brady Open Space would be developed when the construction staging for Phase 2 is complete. During construction, trucks would access the site from Brady Street, 12th Street, Colton Street, and Stevenson Street.

Some sidewalk and lane closures would occur during the two construction phases. During Phase 1 construction, Stevenson Street, sidewalk segments along Brady Street and Colton Street, and the Market Street sidewalk adjacent to the project site may be closed intermittently. During Phase 2, these lane and sidewalk segments, as well as the 12th Street sidewalk adjacent to the project site, again may be closed intermittently during construction. To stem any potential vehicle or pedestrian conflicts during construction, steps would be taken ensure safe vehicle and pedestrian travel within the vicinity of the project site. Any pedestrian walkways fronting construction areas would be covered, and temporary fencing would be installed as needed.

During both Phase 1 and Phase 2, there would be a peak of 50 daily construction trucks during demolition and a peak of 25 daily construction trucks during all other stages of construction. There would be an average of 15 daily construction trucks during demolition of Phases 1 and 2 and an average of 10 daily construction trucks during all other stages of construction. The largest number of daily construction workers is expected during the following Phase 1 and Phase 2 stages: Base Building, Exterior Finishing, and Interior Finishing. During these stages, there would be a peak of 600 daily construction workers during Phase 1 and 300 daily construction workers during Phase 2, and an average of 275 daily construction workers during Phase 1 and 125 daily construction workers during Phase 2. The impact of construction truck traffic would be a temporary lessening of the capacities of streets due to the slower movement and larger turning radii of trucks, which may block travel lanes, and affect both traffic and Muni operations.

There would be an average of between 10 and 275 construction workers per day at the project site, with peak days seeing as many as 600 construction workers. The trip distribution and mode split of construction workers are not known. It is anticipated that the addition of the worker-related vehicle- or transit-trips would not substantially affect transportation conditions, as any impacts on local intersections or the transit network would be similar to, or less than, those associated with the proposed project (once completed) and would be temporary in nature.

In the event that the construction timeframes of the proposed project and other development projects overlap, the project sponsor would be required to work with the Transportation Advisory Staff Committee (TASC), the SFMTA, and the adjacent developers to minimize any potential overlapping construction transportation impacts.

[97] The *SFMTA Blue Book*, 8th Edition (2012), is available online at https://www.sfmta.com/services/streets-sidewalks/construction-regulations.

Overall, proposed project construction would maintain pedestrian circulation adjacent to the project site, and would not require travel lane closures for extended durations that would disrupt or substantially delay vehicles, including transit, and bicyclists traveling on Market Street. Furthermore, construction activities would be required to meet City rules and guidance so that work can be done safety and with the least possible interference with pedestrians, bicyclists, vehicles and transit, and would therefore not result in potentially hazardous conditions. For the reasons described above, the proposed project's construction-related transportation impacts would be ***less than significant***.

Mitigation: None required.

Cumulative Impact Evaluation

The geographic context for the analysis of cumulative transportation impacts includes the sidewalks and roadways adjacent to the project site, and the local roadway and transit network in the vicinity of the project site. The discussion of cumulative transportation impacts assesses the degree to which the proposed project would affect the transportation network in conjunction with overall citywide growth and other reasonably foreseeable future projects. Cumulative conditions analyses account for future land development and transportation projects in the study area, including 10 South Van Ness Avenue, 1500 Mission Street, One Oak, 1546–1564 Market Street, 30 Van Ness Avenue, 1601 Mission Street, 1700 Market Street, One Franklin Street, and 22 & 24 Franklin Street. Intersection traffic volumes were derived from the 2040 traffic forecasts from the SF-CHAMP model runs conducted for the Central SoMa Plan. Travel demand for projects that are not consistent with the zoning assumed in the SF-CHAMP model run, specifically 1500 Mission Street and 10 South Van Ness Avenue, were manually added to the model outputs. The year 2040 Cumulative forecasts are consistent with those used in other recently-completed and on-going transportation studies in the study area, including One Oak, 1500 Mission Street, and 10 South Van Ness Avenue.[98,99,100]

In addition to these development projects, several projects are proposed to improve transit service in the study area. The Van Ness Bus Rapid Transit (BRT) project proposes to increase bus service frequency and reliability by providing buses with a dedicated travel lane and installing high-quality bus stations along Van Ness Avenue. The BRT line would include new stations near the project site at Market Street. Additionally, the Muni Forward Program (formerly Transit Effectiveness Project), includes a comprehensive review of the City's public transit system and provides recommendations designed to make Muni service more reliable, quicker, and more frequent throughout the City. The Van Ness BRT project, Muni Forward (including the 14 Mission Rapid project, the Market Street Hub Project improvements at Mission Street/South Van Ness Avenue/Otis Street, and Better Market Street transit improvements are described below.

Van Ness BRT Project. SFCTA and the SFMTA Board of Directors approved a Locally Preferred Alternative for the Van Ness BRT project in May/June 2012. The Locally Preferred Alternative includes dedicated center-running bus lanes separated from traffic from Mission Street to Lombard Street, which will be used by Muni Routes 49 Van Ness/Mission and 47 Van Ness, as well as by Golden Gate Transit. According to SFCTA, this

[98] *1500 Mission Transportation Impact Study*, Case No. 2014-000362ENV.
[99] *1510–1540 Market Street/11 Oak Street Transportation Study*, Case No. 2009.0159!.
[100] *10 South Van Ness Transportation Impact Study*, Case No. 2015-004568ENV.

configuration, along with elimination of most left turns, transit signal priority, and traffic signal optimization, will help reduce travel time on the corridor by as much as 33 percent. New pedestrian and streetscape improvements will also be implemented throughout the corridor.

The Federal Transit Administration issued a Record of Decision in December 2013 determining that environmental review requirements have been met. In November 2014, the SFMTA completed 65 percent designs for the project and the SFMTA Board legislated the traffic, transit, and parking changes necessary for the project. Van Ness BRT construction is underway, with BRT service beginning on the Van Ness Avenue corridor in 2019.[101] In the vicinity of the proposed project, the Van Ness BRT project will include median bus-only lanes with a stop at Market Street.

Muni Forward. In March 2014, the SFMTA Board of Directors approved a set of recommendations designed to make Muni service more reliable, quicker, and more frequent. The recommendations emerged from the Transit Effectiveness Project (since renamed Muni Forward), a review of the City's public transit system. These recommendations include new routes and route extensions, service-related capital improvements, more service on busy routes, designation of rapid transit routes, travel time reduction proposals on the rapid transit routes, and elimination or consolidation of certain routes or route segments with low ridership. Some service improvements identified in the Muni Forward Implementation Strategy have already been implemented, while many others are approved and anticipated to be implemented in 2017, pending resource availability. Muni Forward proposes the following changes for lines in the proposed project vicinity:

- **7/7R Haight-Noriega**—Limited stop or Rapid service will operate all day on Haight Street in both directions. AM and PM peak-hour frequency will increase from 10 to 7.5 minutes, and midday frequency will increase from 12 to eight minutes. Travel time reductions are expected via implementation of Transit Preferential Streets Toolkit elements on a segment of the route.
- **9/9R San Bruno**—Planned changes for the 9/9R San Bruno route include relocating transit stops from the near-side to the far-side of intersections at proposed traffic signals, to allow buses to take advantage of planned transit signal priority improvements. AM and PM peak-hour frequency will increase from 12 to 10 minutes for regular service and from 12 to eight minutes for rapid service.
- **14/14R Mission**—The 14/14R Mission route is slated for several changes. Stops will be removed at seven intersections (for 14R only), one stop will be relocated, new signal timing will be implemented at two intersections, and northbound and southbound transit-only lanes will be constructed between Cesar Chavez Street and Randall Street. These changes will result in a five-minute travel time reduction and improved transit reliability within the improvement area. Weekday frequency will increase from nine to seven minutes, and the service span for the rapid service will increase on weekends.
- **47 Van Ness**—The 47 Van Ness route is slated for changes on the north and south ends of the route. Proposals include terminating the route on the north end at Van Ness Avenue and North Point Street (the existing North Point Street segment will be replaced by the proposed Route 11 Downtown Connector) and rerouting the segment south of Market Street along South Van Ness Avenue, Division Street, and Townsend Street. One variation under consideration is to maintain the existing portion of the alignment from South Van Ness Avenue to Mission Street and onto 11th Street before operating on Townsend Street. Changes to the route will be coordinated with the Van Ness BRT. In addition, the

[101] Most recent project information available at http://www.sfcta.org/delivering-transportation-projects/van-ness-avenue-bus-rapid-transit-home.

frequencies will change during the AM and PM peak periods from 10 to 7.5 minutes and during the mid-day peak period from 10 to nine minutes.

- **49 Van Ness**—The 49 Van Ness route will be replaced by the 49R Van Ness-Mission Rapid route. This route will incorporate changes proposed for the Van Ness BRT between Market Street and the northern route terminus at North Point Street. Frequencies will change during the AM and PM peak periods from eight to 7.5 minutes.

The 14 Mission Rapid Project. As part of Muni Forward, the SFMTA is implementing transit priority and traffic improvements along Mission Street between 11th Street and Randall Street. The 14 Mission Rapid Project is intended to make it safer to walk, increase the reliability of Muni's 14/14R and 49 lines, and ease traffic congestion along the corridor. The first phase was implemented starting in March 2016. It included red transit-only lanes, turn restrictions and required right turns on Mission Street from 14th Street to 30th Street. The following changes are proposed in the vicinity of the proposed project:

- New transit bulbs on Mission Street at the northeast and northwest corners of the Mission Street/South Van Ness Avenue intersection;
- New pedestrian bulbs at the Mission Street/South Van Ness Avenue intersection;
- Southbound transit-only lane/travel lane reduction on Mission Street from South Van Ness Avenue to Cesar Chavez Street; and
- Conversion of a bulb to a bus zone, including a new transit island, on westbound Otis Street (150 Otis Street) west of the intersection with South Van Ness Avenue.

The Hub Improvements at Mission Street/South Van Ness Avenue/Otis Street. Several transit, bicycle, and pedestrian improvements are proposed at the intersection of Mission Street/South Van Ness Avenue/Otis Street as part of the Market Street Hub Project, a planning effort focused around affordable housing, coordinated transportation planning, and place-making. Transit improvements at this intersection as presently envisioned include:

- Eastbound and westbound transit-only lanes on Mission Street east of South Van Ness Avenue and eastbound transit-only lanes on Mission Street west of South Van Ness Avenue;
- Westbound transit-only lanes on Otis Street;
- Van Ness BRT end-of-line at Mission Street; and
- A Muni Forward bus boarding island on Otis Street west of South Van Ness Avenue.

Better Market Street. San Francisco Public Works, in coordination with the San Francisco Planning Department and the SFMTA, proposes to redesign and provide various transportation and streetscape improvements to the 2.2-mile segment of Market Street between Octavia Boulevard and The Embarcadero. Improvements may also be proposed for the 2.3-mile segment of Mission Street between Valencia Street and The Embarcadero, as well as Valencia Street between McCoppin and Market Streets, and 10th Street between Market and Mission Streets. Better Market Street project elements consist of both transportation and streetscape improvements, including changes to roadway configuration and private vehicle access; traffic signals; surface transit, including transit-only lanes, stop spacing, service, stop location, stop characteristics and infrastructure; bicycle facilities; pedestrian facilities; streetscapes; commercial and passenger loading; vehicular parking; plazas; and utilities. Environmental review was recently initiated, and it will analyze three possible alternatives for the project.

Alternatives 1 and 2 involve redesign and improvement of Market Street only, while Alternative 3 would redesign and improve Mission Street, in addition to providing the Alternative 1 improvements to Market Street. Alternatives 1 and 2 each have two design options for bicycle facilities on Market Street. Alternative 1 would remove all commercial and passenger loading zones on Market Street, with the exception of paratransit users, and new commercial and passenger loading zones would be created on adjacent cross streets and alleys. Under Alternative 2, some commercial and passenger loading zones would remain on Market Street, and some commercial and passenger loading zones would be created on adjacent cross streets and alleys.

Alternatives 1 and 2 include two designs for the bicycle facilities on Market Street (Design Option A and Design Option B). Under Alternatives 1 and 2 Design Option A, an enhanced version of the existing shared vehicle and bicycle lane with painted sharrows (shared lane pavement markings) would be provided at locations where a dedicated bicycle facility is not already present. Under Alternatives 1 and 2 Design Option B, a new raised cycle track the entire length of Market Street would be provided, except at locations where the BART/Muni entrances or other obstructions would not allow it. Alternative 3 includes the proposed bicycle facilities on Market Street described under Alternative 1 Design Option A and adds a cycle track in both directions and a floating parking lane (located between the travel lane and the cycle track) on one side of the street) on Mission Street. Under Alternative 3, the existing transit-only lanes on Mission Street would be removed and Muni, Golden Gate Transit, and SamTrans bus routes would be moved to Market Street.

Design, environmental review, selection of the preferred alternative, and approvals will continue through 2017, and construction of improvements is currently anticipated to begin sometime in 2018.[102]

Cumulative VMT Impacts

Impact C-TR-1: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not contribute to regional VMT in excess of expected levels. (Less than Significant)

The nature of VMT makes it a cumulative impact. The amount and distance of driving caused by past, present, and future projects contribute to the physical secondary environmental impacts associated with VMT. It is likely that no single project by itself would be sufficient in size to prevent the region or state from meeting its VMT reduction goals. Instead, a project's individual VMT contributes to cumulative VMT impacts. The VMT and induced automobile travel project-level thresholds are based on levels at which new projects are not anticipated to conflict with state and regional long-term greenhouse gas emission reduction targets and statewide VMT per capita reduction targets set in 2020. Therefore, because the proposed project would not exceed the project-level thresholds for VMT and induced automobile travel (Impact TR-1), the proposed project would not be considered to result in a cumulatively considerable contribution to VMT impacts.

Table IV.B-13, Daily VMT per Capita—2040 Cumulative Conditions, presents the 2040 cumulative average daily VMT per capita for the residential, office, and retail land uses for the TAZ within which the proposed project is located, as well as the Bay Area regional average. San Francisco 2040 cumulative conditions were

[102] Better Market Street Project information available online at http://www.bettermarketstreetsf.org/about-common-questions.html. Accessed October 25, 2016.

projected using a SF-CHAMP model run, including residential and job growth estimates and reasonably foreseeable transportation investments through 2040:

- Projected 2040 average daily VMT per capita for residential land uses is 3.1 for the transportation analysis zone the project site is located in, TAZ 578. This is 80 percent below the projected 2040 regional average daily VMT per capita of 15.8;
- Projected 2040 average daily work-related VMT per employee for the office use is 6.9 for TAZ 578. This is 59 percent below the projected 2040 regional average daily work-related VMT per employee of 16.7; and
- Projected 2040 average daily retail VMT per employee for the retail use is 9.0 for TAZ 578. This is 37 percent below the projected 2040 regional average daily retail VMT per employee of 14.3.

TABLE IV.B-13 DAILY VMT PER CAPITA—2040 CUMULATIVE CONDITIONS

Trip Type (Land Use)	Bay Area Regional Average	Regional Average Minus 15%	TAZ 578[a]
Households (residential)	15.8	13.7	3.1
Employment (office)	16.7	14.5	6.9
Employment (retail)	14.3	12.4	9.0

SOURCE: San Francisco Transportation Authority SF-CHAMP model, 2016.
NOTE:
a. The Traffic Analysis Zone (TAZ) in which the project site is located.

Overall, because the project site is located in an area where VMT is more than 15 percent below the projected 2040 regional average, the proposed project's residential, office, and restaurant/retail uses would not result in substantial additional VMT.

The proposed project is not a transportation project. However, the proposed project would include features that would alter the transportation network. As discussed in the existing plus project conditions, these features fit within the general types of projects identified above that would not substantially induce automobile travel. Other nearby proposed developments, including 10 South Van Ness Avenue, would make changes to the transportation network surrounding the proposed project. However, these changes are similar to those included in the proposed project, and they would not substantially induce automobile travel. Therefore, the proposed project would not have a considerable contribution to any substantial cumulative increase in vehicle miles traveled and the impact would be ***less than significant***.

Mitigation: None required.

Cumulative Traffic Hazard Impacts

Impact C-TR-2: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not cause major traffic hazards. (Less than Significant)

As described above, a number of cumulative transportation network projects are currently underway, planned, or proposed that would enhance the transportation network in the project vicinity, particularly for pedestrians and bicyclists. These include the Van Ness BRT Project, Muni Forward, 14 Mission Rapid Project, Better Market

Street, and the Market Street Hub Project, among others that are targeted at reducing existing hazards. Cumulative transportation projects, including the proposed project's sidewalk improvements and driveways, would not introduce unusual design features, and these projects would be designed to meet City, National Association of City Transportation Officials (NACTO), and Federal Highway Administration (FHWA) standards, as appropriate. Other development projects proposing street changes in the area would be subject to these requirements as well. Increases in vehicle, pedestrian and bicycle travel associated with cumulative development, including the proposed project, could result in the potential for increased vehicle-pedestrian and vehicle-bicycle conflicts, but the increased potential for conflicts would not be considered new or substantial worsening of a traffic hazard. Therefore, the proposed project, in combination with past, present, and reasonably foreseeable development projects, would not contribute considerably to a ***significant*** cumulative traffic hazard impacts.

Mitigation: None required.

Cumulative Transit Impacts

Impact C-TR-3: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in significant transit impacts. (Less than Significant)

The 2040 cumulative transit screenline analysis accounts for ridership and/or capacity changes associated with such projects as Muni Forward, the Van Ness BRT, Central Subway Project (which is scheduled to open in 2019), the new Transbay Transit Center, the electrification of Caltrain, and expanded Water Emergency Transportation Authority (WETA) ferry service. Existing and 2040 cumulative conditions for the weekday PM peak hours for the Muni and regional screenlines are presented in tables below.[103] The 2040 cumulative transit analysis was developed by SFMTA based on the SFCTA travel demand model analysis conducted as part of the Central SoMa Plan effort.

Muni

As indicated in **Table IV.B-14, Muni Downtown Screenline Analysis, Existing and 2040 Cumulative Conditions—Weekday PM Peak Hour**, for 2040 cumulative conditions at Muni screenlines during the PM peak hour, the capacity utilization of the Northeast and Southwest screenlines and corridors within the screenlines would be less than Muni's 85 percent capacity utilization standard. However, under 2040 cumulative conditions, the capacity utilization of a number of corridors within the Northwest and Southeast screenlines would increase and exceed the 85 percent capacity utilization standard during the PM peak hour. The proposed project would add seven PM transit trips to the Northwest corridor (0.1 percent contribution) and six PM transit trips to the Southeast corridor (0.1 percent contribution); therefore, cumulative impacts on the Muni screenlines during the PM peak hour would also be ***less than significant***.

[103] Cumulative AM peak hour conditions are analyzed qualitatively, as discussed above under Transit Impacts, because the proposed project's contribution to transit impacts would be larger during the PM peak hour than during the AM peak hour. In addition, while transit ridership under the AM peak hour is at times high, the PM peak hour reflects maximum capacity conditions overall.

TABLE IV.B-14 MUNI DOWNTOWN SCREENLINE ANALYSIS, EXISTING AND 2040 CUMULATIVE CONDITIONS—WEEKDAY PM PEAK HOUR

	Existing			2040 Cumulative		
Screenline/Corridor	**Ridership**	**Capacity**	**Utilization**	**Ridership**	**Capacity**	**Utilization**
Northeast						
Kearny/Stockton	2,245	3,227	67.5%	6,295	8,329	75.6%
Other	683	1,078	63.4%	1,229	2,065	59.5%
Subtotal	*2,928*	*4,405*	*66.5%*	*7,524*	*10,394*	*72.4%*
Northwest						
Geary	1,964	2,623	74.9%	2,996	3,621	82.7%
California	1,322	1,752	75.5%	1,766	2,021	**87.4%**
Sutter/Clement	425	630	67.5%	749	756	**99.1%**
Fulton/Hayes	1184	1,323	89.5%	1,762	1,878	**93.8%**
Balboa	625	974	64.2%	776	974	79.7%
Subtotal	*5,520*	*7,302*	*75.8%*	*8,049*	*9,250*	*87.0%*
Southeast						
Third	782	793	98.6%	2,300	5,712	40.3%
Mission	1,407	2,601	54.1%	2,673	3,008	**88.9%**
San Bruno/Bayshore	1,536	2,134	72.0%	1,817	2,134	**85.1%**
Other	1,084	1,675	64.7%	1,582	1,927	82.1%
Subtotal	*4,809*	*7,203*	*66.8%*	*8,372*	*12,781*	*65.5%*
Southwest						
Subway	4,904	6,164	79.6%	5,692	6,804	83.7%
Haight/Noriega	977	1,554	62.9%	1,265	1,596	79.3%
Other	555	700	79.3%	380	840	45.2%
Subtotal	*6,436*	*8,418*	*76.5%*	*7,337*	*9,240*	*79.4%*
Total All Screenlines	***19,693***	***27,328***	***72.1%***	***31,282***	***41,665***	***75.1%***

SOURCE: SF Planning Department Memorandum, Transit Data for Transportation Impact Studies, May 2015.
NOTE:
Bold indicates capacity utilization greater than the Muni 85 percent capacity utilization standard.

In summary, considering cumulative Muni screenline and corridor conditions, the proposed project would generate new transit trips during the AM and PM peak hours that would cross the corridors and screenlines that are projected to operate at more than the 85 percent capacity utilization standard. As discussed above, the proposed project would not contribute considerably to these corridors and screenlines, and therefore, the proposed project would not contribute considerably to significant cumulative Muni transit impacts. SFMTA would, over time and as part of their operational practices, continue to monitor Muni service citywide and reporting on meeting service goals and capacity utilization standards, with the goal of providing additional capacity or other service changes, which would thereby reduce peak hour capacity utilization to less than the performance standard, where feasible. As noted above, the Better Market Street project is currently undergoing

environmental review, and would result in changes in the transit network on Market Street and, depending on the alternative selected for implementation, on Mission Street. Alternative 3 would relocate all existing Muni, Golden Gate Transit and SamTrans routes on Mission Street to Market Street. The proposed project would not preclude implementation of the Better Market Street project transit changes on Market and Mission Streets.

Regional Transit

Regional screenlines are presented in **Table IV.B-15, Regional Screenline Analysis, Existing and 2040 Cumulative Conditions—Weekday PM Peak Hour**, for the PM peak hour. Under 2040 cumulative conditions, with the exception of BART to the East Bay during the PM peak hour, no regional transit provider screenlines are expected to exceed their established capacity utilization thresholds (i.e., 100 percent). The proposed project would add 129 regional transit trips, including trips within San Francisco on BART, and trips entering and exiting the City. Of these 129 transit trips, 46 would be in the outbound direction during the PM peak hour and would cross the regional screenlines shown in **Table IV.B-15**.

During the PM peak hour, the proposed project would add 14 trips to BART to the East Bay, and the contribution would be less than 0.1 percent, and would not be considered a considerable contribution to BART capacity utilization exceeding the 100 percent standard. Therefore, for the PM peak hour conditions, the proposed project would not contribute considerably to cumulative impacts on the regional screenlines, and the cumulative impacts to regional transit would be ***less than significant***.

Overall, the proposed project would not contribute considerably to these corridors and screenlines, and therefore, the proposed project in combination with past, present and reasonably foreseeable development in San Francisco, would result in ***less-than-significant*** cumulative transit impacts.

Mitigation: None required.

TABLE IV.B-15 REGIONAL SCREENLINE ANALYSIS, EXISTING AND 2040 CUMULATIVE CONDITIONS—WEEKDAY PM PEAK HOUR

	Existing			2040 Cumulative		
Screenline/Corridor	**Ridership**	**Capacity**	**Utilization**	**Ridership**	**Capacity**	**Utilization**
East Bay						
BART	24,488	22,784	**107.5%**	36,000	32,100	**112.1%**
AC Transit	2,256	3,926	57.5%	7,000	12,000	58.3%
Ferries	805	1,615	49.8%	5,319	5,940	89.5%
Subtotal	*27,549*	*28,325*	*97.3%*	*48,319*	*50,040*	*96.6%*
North Bay						
GGT buses	1,384	2,817	49.1%	2,070	2,817	73.5%
Ferries	968	1,949	49.4%	1,619	1,959	82.6%
Subtotal	*2,352*	*4,776*	*49.2%*	*3,689*	*4,776*	*77.2%*
South Bay						
BART	13,500	18,900	71.4%	20,000	28,808	69.4%
Caltrain	2,377	3,100	76.7%	2,529	3,600	70.3%
SamTrans	141	320	44.1%	150	320	46.9%
Ferries	0	0	0%	59	200	29.5%
Subtotal	*16,018*	*22,320*	*71.8%*	*22,738*	*32,928*	*69.1%*
Total All Screenlines	***45,919***	***55,421***	***82.9%***	***74,746***	***87,744***	***85.2%***

SOURCE: SF Planning Department Memoranda, Transit Data for Transportation Impact Studies, May 2015; and Updated BART Regional Screenlines, October 2016.

NOTE:
Bold indicates capacity utilization greater than the regional operator 100 percent capacity utilization standard.

Cumulative Pedestrian Impacts

Impact C-TR-4: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in significant pedestrian impacts. (Less than Significant)

The neighborhood surrounding the project site is expected to experience growth over the coming decades. As developments are proposed, such as the nearby 10 South Van Ness Avenue, 1500 Mission Street, One Oak, 30 Van Ness Avenue, and 30 Otis Street projects, improved sidewalks and pedestrian facilities would be required for new developments. In general, the increased development, along with localized improvements to the pedestrian network to adhere to the *Better Streets Plan*, would not result in overcrowding of sidewalks or create new potentially hazardous conditions for pedestrians under cumulative conditions as the sidewalk widths would be adequate to accommodate such growth. These sidewalk improvement elements would improve pedestrian conditions by facilitating safe and easy pedestrian crossings, by providing safe spaces for pedestrians, by slowing traffic, and by increasing pedestrian visibility to drivers. In general, localized improvements to the pedestrian network would adhere to the Better Streets Plan and would not generate new potentially hazardous conditions for pedestrians under cumulative conditions. Improvements would typically

be targeted at reducing hazards and enhancing safety in keeping with the City's commitment to the Vision Zero policy to improve pedestrian conditions at high collision locations, including those surrounding the project site.

Walk trips to the local area may increase between the completion of the proposed project and the completion of additional cumulative development (for example, 10 South Van Ness Avenue), due to the addition of complementary land uses such as restaurant and office space. Transit improvements, including the Van Ness BRT project, and TDM measures for new developments could increase the number of pedestrians accessing transit surrounding the project site over time, although not to a level that would induce overcrowding of sidewalks under cumulative conditions. The streetscape improvements discussed above would also help limit any potential crowding effects of increased walk trips in the area.

Between existing plus project and 2040 cumulative conditions, the number of vehicles on study area roadways is projected to increase. The overall increase in traffic volumes under 2040 cumulative conditions could result in an increase in the potential for vehicle-pedestrian conflicts at intersections in the study area. Implementation of TDM measures would reduce the number of future vehicle trips within the vicinity of the project site and would increase non-motorized trips. While there would be a general increase in vehicle traffic that is expected through the future cumulative scenario, the proposed project would not create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the project site and adjoining areas.

The proposed project would include measures to ensure pedestrian safety. For example, implementation of the 12th Street streetscape plan, designed collaboratively with the developers for 10 South Van Ness Avenue, would reduce vehicle and pedestrian conflicts along that segment. For the above reasons, the proposed project, in combination with past, present and reasonably foreseeable development in San Francisco, would not contribute considerably to a significant cumulative pedestrian impact. In addition, as stated above **Improvement Measures I-TR-2a, Monitoring and Abatement of Queues**, and **I-TR-2b, Notification at Driveway**, would reduce vehicle and pedestrian conflicts by providing notification of vehicles exiting the two proposed project driveways and further reduce the ***less-than-significant*** pedestrian impact.

Mitigation: None required.

Cumulative Bicycle Impacts

Impact C-TR-5: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in cumulative bicycle impacts. (Less than Significant)

There are multiple bicycle routes near the project site, including Class II bicycle lanes on Market, Valencia, Otis, and 11th Streets, and Class III facilities on Octavia and Page Streets. Two short Class IV bikeways provide connection from Market Street to McCoppin Street and Elgin Park on either side of U.S. 101. These bicycle routes could comfortably accommodate additional bicycle trips generated by the proposed project and other cumulative projects in the area.

In general, localized improvements to the bicycle network would adhere to the Better Streets Plan and would not generate new potentially hazardous conditions for bicyclists under cumulative conditions. Improvements would typically be targeted at reducing hazards and enhancing safety. These bicycle network elements would improve bicycle conditions by facilitating safe intersection crossings, by providing corridors for bicyclists, by

slowing vehicle traffic, and by increasing bicycle visibility to drivers. These elements would be in keeping with the City's commitment to the Vision Zero policy to improve bicycle conditions at high collision locations surrounding the project site.

There is an anticipated increase in background automobile traffic between existing plus project and cumulative conditions, as shown in the cumulative traffic forecasts. This would result in an increase in automobile-bicycle conflicts at intersections and driveways in the study area. Implementation of TDMs through the City's TDM Program Standards would reduce the number of future vehicle trips within the vicinity of the project site and would increase non-motorized trips. While there would be a general increase in vehicle and bicycle traffic that is expected through the future cumulative scenario, the proposed project would not create potentially hazardous conditions for bicycles, or otherwise interfere with bicycle accessibility to the project site and adjoining areas.

The proposed project would include measures to ensure bicycle safety. For example, implementation of the 12th Street streetscape plan, designed collaboratively with the developers of 10 South Van Ness Avenue, would reduce vehicle and bicycle conflicts along that segment. For the above reasons, the proposed project, in combination with past, present, and reasonably foreseeable development in San Francisco, would not contribute considerably to a significant cumulative bicycle impact.

Mitigation: None required.

Cumulative Loading Impacts

Impact C-TR-6: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in significant impacts on loading. (Less than Significant)

Loading impacts are by their nature localized and site-specific. However, several development projects are proposed within the vicinity of the project site, and the proposed project would in part meet its loading demand through the use of on-street loading spaces on streets adjacent to the project site. Passenger and commercial loading areas on 12th Street were designed in coordination with the project sponsor of 10 South Van Ness, since loading for both projects would occur on 12th Street. Proposed development at 30 Otis Street could make passenger loading at the Colton Street Affordable Housing building more difficult, as vehicle turn-around movements in the Colton Street alleyway may be constrained. The project sponsor would work with SFMTA and the developer at 30 Otis Street to ensure the two sites' development and loading plans do not cause passenger or delivery loading conflicts.

The proposed project would provide appropriate loading facilities for the anticipated demand. Therefore, the proposed project, in combination with past, present and reasonably foreseeable development in San Francisco, would result in ***less-than-significant*** cumulative loading impacts.

Mitigation: None required.

Cumulative Emergency Vehicle Access Impact

Impact C-TR-7: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in a significant impact on emergency vehicle access. (Less than Significant)

The proposed project would not significantly contribute to cumulative emergency vehicle access conditions in the area. With implementation of the proposed project, emergency vehicle access to the project site would be maintained. While a general increase in vehicle traffic would be expected through the cumulative scenario, the proposed project would not create potentially hazardous conditions for emergency vehicles, or otherwise interfere with emergency vehicle accessibility to the project site and adjoining areas. Therefore, for the above reasons, the proposed project, in combination with past, present and reasonably foreseeable development in San Francisco, would result in ***less-than-significant*** cumulative impact on emergency vehicle access.

Mitigation: None required.

Cumulative Construction Impacts

Impact C-TR-8: The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would contribute considerably to significant cumulative construction-related transportation impacts. (Significant and Unavoidable with Mitigation)

Construction of the proposed project may overlap with the construction of other nearby projects, including, among others, 1601 Mission, 10 South Van Ness, 30 Otis, 1546–1564 Market, 30 Van Ness, One Oak, Better Market Street, and the 1500 Mission Street projects. In addition, streetscape improvements associated with the Van Ness BRT will be constructed within this timeframe, and service is expected to begin on Van Ness Avenue by early 2019. According to preliminary information on construction of the proposed Better Market Street, construction of project improvements is anticipated to occur in 2020, and, depending on the alternative selected for implementation, may partially overlap with proposed project construction.

Projected cumulative development in the vicinity of the intersection of Van Ness Avenue and Market Street, in combination with transportation/streetscape projects anticipated to occur within a few blocks of the project site, could result in multiple travel lane closures, high volumes of trucks in the project vicinity, and travel lane and sidewalk closures. These construction activity elements could disrupt or delay transit, pedestrians or bicyclists, or result in potentially hazardous conditions (e.g., high volumes of trucks turning at intersections). The uncertainty concerning construction schedules of cumulative development could further exacerbate these disruptions, delays, and introduced safety hazards. Despite the best efforts of the project sponsors and project construction contractors, it is possible that simultaneous construction of the cumulative projects could result in significant disruptions to transit, pedestrian, and bicycle circulation, even if each individual project alone would not have significant impacts. In some instances, depending on construction activities, construction overlap of two or more projects may not result in significant impacts. However, for conservative purposes, given the concurrent construction of multiple buildings and transportation projects, some in close proximity to each other, the expected intensity (i.e., the projected number of truck trips) and duration of construction activities that could occur simultaneously within a small geographic area, and likely impacts to transit, bicyclists, and pedestrians, cumulative construction-related transportation impacts would be considered ***significant***.

Construction of the proposed project would contribute considerably to these significant cumulative construction-related transportation impacts. The following mitigation measures have been identified to reduce significant cumulative construction-related transportation impacts. **Mitigation Measures M-C-TR-8a, Non-Peak Construction Traffic Hours**; **M-C-TR-8b, Construction Management Plan**; and **M-C-TR-8c, Cumulative Construction Coordination**, would require the project sponsor, or its contractor(s) to limit construction traffic to non-peak morning and afternoon commute hours, to consult with various City departments such as SFMTA and Public Works through Interdepartmental Staff Committee on Traffic and Transportation (ISCOTT), and other interdepartmental meetings, as needed, to develop project-specific construction management plans that would address construction-related vehicle routing, detours, and transit, bicycle, and pedestrian movements adjacent to the construction area for the duration of construction overlap. In addition, key coordination meetings would be held jointly between project sponsors and contractors of other projects for which the City departments determine construction impacts could overlap. These construction mitigation measures would not result in secondary transportation impacts. Implementation of **Mitigation Measures M-C-TR-8a, Non-Peak Construction Traffic Hours**; **M-C-TR-8b, Construction Management Plan**; and **M-C-TR-8c, Cumulative Construction Coordination**, would minimize, but would not eliminate, the significant cumulative impacts related to conflicts between construction activities and pedestrians, transit, bicyclists, and autos. Other mitigation measures, such as imposing sequential (i.e., non-overlapping) construction schedules for all projects in the vicinity, were considered but deemed infeasible due to potentially lengthy delays in project implementation. Therefore, construction of the proposed project, in combination with past, present and reasonably foreseeable development in San Francisco, could contribute considerably to cumulative construction-related transportation impacts, which would remain ***significant and unavoidable with mitigation***.

Mitigation Measures

Mitigation Measure M-C-TR-8a – Non-Peak Construction Traffic Hours. To minimize the construction-related disruption of the general traffic flow on adjacent streets during the weekday AM and PM peak periods, truck movements and deliveries requiring lane closures shall be limited to occur between 9:00 a.m. and 4:30 p.m. (Monday to Friday), outside of peak morning and evening weekday commute hours.

Mitigation Measure M-C-TR-8b – Construction Management Plan. The project sponsor and/or its construction contractor shall propose a Construction Management Plan that includes measures to reduce potential conflicts between construction activities and pedestrians, transit and autos at the Project Site. The contractor shall supplement the standard elements of a construction traffic control/management plan with additional measures for Proposed Project construction, such as staggering start and end times, coordinated material drop offs, collective worker parking and transit to job site and other measures. Any such plan shall be reviewed by the TASC for consistency with the findings included herein and, where needed, additional measures may be imposed to minimize potentially significant construction traffic impacts.

Alternative Transportation for Construction Workers. Limited parking would be available for construction workers in the future open space portion of the Project Site. The location of construction worker parking shall be identified as well as the person(s) responsible for monitoring the implementation of the proposed parking plan. The use of on-street parking to accommodate construction worker parking shall be discouraged. The project sponsor could provide additional on-site parking once the below grade parking garage is usable. To minimize parking demand and vehicle trips associated with construction

workers, the construction contractor shall include in their contracts methods to encourage carpooling and transit access to the Project Site by construction workers. Construction workers should also be encouraged to consider cycling and walking as alternatives to driving alone to and from the Project Site.

Proposed Project Construction Updates for Adjacent Businesses and Residents. To minimize construction impacts on access for nearby institutions and businesses, the Proposed Project Sponsor shall provide nearby residences and adjacent businesses, such as through a website with regularly-updated information regarding Proposed Project construction, including a Proposed Project construction contact person, construction activities, duration, peak construction activities (e.g., concrete pours), travel lane closures, and lane closures. At regular intervals to be defined in the Construction Management Plan, an email notice shall be distributed by the project sponsor or its contractor(s) that shall provide current construction information of interest to neighbors, as well as contact information for specific construction inquiries or concerns.

Coordinate Construction with Nearby Projects. To minimize construction impacts, the Project Sponsor shall coordinate construction activities and right-of-way closures with nearby projects, such as 10 South Van Ness, One Oak, Better Market Street, and 1500 Mission, as specified in Mitigation Measure M-C-TR-8c – Cumulative Construction Coordination. The Project Sponsor's Construction Management Plan, which would be required for each development, would include a section that summarizes the coordination efforts.

Maintain Local Circulation. Comprehensive signage should be in place for all vehicle and pedestrian detours. If necessary, the Project Sponsor should provide a traffic control officer to direct traffic around the Project Site during detour periods. Pedestrian access should be preserved during construction detours as long as safe passage can be provided.

Mitigation Measure M-C-TR-8c – Cumulative Construction Coordination. If construction of the proposed project is determined to overlap with nearby adjacent project(s) as to result in temporary construction-related transportation impacts, and in addition to preparing its own Construction Management Plan as required by Mitigation Measure M-C-TR-8b, the project sponsor or its contractor(s) shall consult with various City departments such as the SFMTA and Public Works through ISCOTT, and other interdepartmental meetings as deemed necessary by the SFMTA, Public Works, and the Planning Department. This coordination shall address construction-related vehicle routing, detours, and maintaining transit, bicycle, vehicle, and pedestrian movements in the vicinity of the construction area for the duration of the construction period overlap. Key coordination meetings would be held jointly between project sponsors and contractors of other projects for which the City departments determine impacts could overlap. The coordination shall consider other ongoing construction in the project vicinity, including development and transportation infrastructure projects, and topics of coordination shall include, but not be limited to, the following:

- *Restricted Construction Truck Access Hours*—Coordinate limitations on truck movements requiring lane closures to the hours between 9:00 a.m. and 4:30 p.m. (Monday-Friday), or other times if approved by the SFMTA, to minimize disruption to vehicular traffic, including transit, during the AM and PM peak periods.
- *Construction Truck Routing Plans*—Identify optimal truck routes between the regional facilities and the various project sites, taking into consideration truck routes of other development projects and any construction activities affecting the roadway network.
- *Coordination of Temporary Lane and Sidewalk Closures*—Coordinate lane closures with other projects requesting concurrent lane and sidewalk closures through the ISCOTT and

interdepartmental meetings process above, to minimize the extent and duration of requested lane and sidewalk closures. Travel lane closures shall be minimized especially along transit and bicycle routes, so as to limit the impacts to transit service and bicycle circulation and safety.

- *Maintenance of Transit, Vehicle, Bicycle, and Pedestrian Access*—The project sponsor/construction contractor(s) shall meet with Public Works, SFMTA, the Fire Department, Muni Operations and other City agencies to coordinate feasible measures to include in the Construction Management Plan required by Mitigation Measure M-C-TR-8b to maintain access for transit, vehicles, bicycles and pedestrians. This shall include an assessment of the need for temporary transit stop relocations or other measures to reduce potential traffic, bicycle, and transit disruption and pedestrian circulation effects during construction of the project.
- *Carpool, Bicycle, Walk and Transit Access for Construction Workers*—Coordinate efforts and methods to encourage carpooling, bicycling, walk and transit access to the various project sites by construction workers (such as providing secure bicycle parking spaces, participating in free-to-employee and employer ride matching program from www.511.org, participating in emergency ride home program through the City of San Francisco (www.sferh.org), and providing transit information to construction workers).
- *Coordinated Project Construction Updates for Adjacent Businesses and Residents*—Coordinate to the extent appropriate, notifications to nearby residences and adjacent businesses with regularly-updated information regarding project construction, including construction activities, peak construction vehicle activities (e.g., concrete pours), travel lane closures, and lane closures.

Significance after Mitigation: Even with Mitigation Measures M-C-TR-8a through M-C-TR-8c, conflicts between construction activities and pedestrians, transit, bicyclists, and vehicles could still occur; therefore, impacts would remain ***significant and unavoidable with mitigation***.

Parking Discussion

As noted above, Senate Bill 743 amended CEQA by adding Public Resources Code Section 21099 regarding the analysis of parking impacts for certain urban infill projects in transit priority areas.[104] Public Resources Code Section 21099(d), effective January 1, 2014, provides that "… parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment." Accordingly, parking is no longer to be considered in determining if a project has the potential to result in significant environmental effects for projects that meet all three criteria established in the statute. However, the Planning Department acknowledges that parking conditions may be of interest to the public and the decision-makers, and therefore, a parking demand analysis is provided for informational purposes and considers any secondary physical impacts associated with constrained supply.

[104] A "transit priority area" is defined as an area within 0.5 mile of an existing or planned major transit stop. A "major transit stop" is defined in California Public Resources Code Section 21064.3 as a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. A map of San Francisco's Transit Priority Areas is available at http://sfmea.sfplanning.org/Map%20of%20San%20Francisco%20Transit%20Priority%20Areas.pdf.

Proposed Project Supply

The proposed project would provide a total of 316 vehicle parking spaces (24 spaces for non-residential uses and 292 spaces for residential uses), including three car-share spaces and seven ADA-accessible spaces. The spaces would be in a two-level below-grade garage. Per *Planning Code* (Section 151.1), NCT (Neighborhood Commercial Transit District), 292 parking spaces would be allowed for the proposed 584 residential units and 26 spaces for the combined 40,300 square feet of non-residential space for a total of 318 permitted parking spaces. Therefore, the proposed parking supply complies with the *Planning Code* maximum parking requirements.

In accordance with *Planning Code* Section 155(i), the proposed project would be required to provide one ADA-accessible parking space for each 25 parking spaces provided for retail uses, and two percent of the total residential spaces, amounting to seven spaces designated for persons with disabilities. Therefore, the proposed parking supply would meet the *Planning Code* minimum ADA-accessible parking requirements.

Planning Code Section 166 requires a minimum of two car-share spaces for 201 residential units plus one for every 200 dwelling units over 200. No car-share spaces are required for the 24 parking spaces allocated to non-residential uses. Therefore, the proposed project would require three car-share spaces. As three car-share spaces are proposed, the proposed project would comply with the *Planning Code*'s car-share space requirements.

Parking Supply vs. Demand

The parking demand for the new uses associated with the proposed project was determined based on the methodology presented in the *SF Guidelines*. The proposed project would generate a maximum parking demand of 571 spaces midday and 676 spaces in the evening. The expected proposed project long-term parking demand would not be accommodated within the proposed supply of off-street parking spaces. As indicated in the Environmental Setting, on-street parking spaces in the study area are at 87 percent utilization at midday (1:30 p.m. to 3:00 p.m.) and 61 percent in the evening (6:30 p.m. to 8:00 p.m.). During the midday peak hour, there is not sufficient on-street supply to accommodate the overflow demand from the proposed project; demand for 72 spaces would be unmet. There is sufficient on-street supply to accommodate the additional demand in the evening.

The proposed project would also include three car-share parking spaces on-site. Car-share vehicles would be accessible to both the proposed project and the neighborhood residents. Accommodation of car-share vehicles could further reduce the demand for on-street parking in the area by providing an alternative to owning a personal automobile.

The off-street parking spaces proposed by the proposed project, combined with on-street supply, would be less than the anticipated parking demand during the midday peak hour, resulting in a net parking deficit of 72 spaces. Implementation of TDMs through the City's TDM Program Standards would reduce parking demand.

CHAPTER V
Other CEQA Considerations

The California Environmental Quality Act (CEQA) Guidelines Section 15126 requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the Environmental Impact Report (EIR) must also identify (1) significant environmental effects of the proposed project; (2) significant environmental effects that cannot be avoided if the proposed project is implemented; (3) significant irreversible environmental changes that would result from implementation of the proposed project; (4) growth-inducing impacts of the proposed project; (5) mitigation measures proposed to minimize the significant effects; and (6) alternatives to the proposed project.

V.A Growth Inducement

The CEQA Guidelines require that an EIR evaluate the growth-inducing impacts of a proposed action (Section 15126.2(d)). A growth-inducing impact is defined in the CEQA Guidelines Section 15126.2(d) as:

> *[T]he ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth … It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.*

A project can have direct and/or indirect growth-inducement potential. Direct growth inducement would result if a project involved construction of new housing that would result in new residents moving to the area. A project can have indirect growth-inducement potential if it would establish substantial new permanent employment opportunities (e.g., commercial, industrial or governmental enterprises) or if it would involve a substantial construction effort with substantial short-term employment opportunities and indirectly stimulate the need for additional housing and services to support the new employment demand. Similarly, under CEQA, a project would indirectly induce growth if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service. Increases in population could tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require analysis of the characteristics of projects that may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

The project site is in the Market-Octavia/Upper Market Priority Development Area identified in *Plan Bay Area*, which calls for an increasing percentage of Bay Area growth to occur as infill development in areas with good transit access and where services necessary to daily living are provided in proximity to housing and jobs.[105] With its abundant transit service and mixed-use neighborhoods, San Francisco is expected to accommodate an increasing share of future regional growth. As stated under Topic E.2, *Population and Housing*, Impact PH-1, in

[105] ABAG, *Plan Bay Area*, Priority Development Area Showcase. Available at http://gis.abag.ca.gov/website/PDAShowcase/, accessed May 20, 2016.

the Initial Study (Appendix A), in general, a project would be considered growth-inducing if its implementation would result in substantial population increases and/or new development that might not occur if the proposed project were not approved and implemented. As described in the Initial Study, the addition of up to 584 new market-rate and affordable residential units would increase the residential population on the site by approximately 921 persons. The 2010 U.S. Census indicates that the population in the project vicinity, including all census tracts located within 0.25 mile of the project site (Census Tracts 124.02, 176.01, 177, 201, 168.02, 162, 202, 168.01) is approximately 35,196. Thus, the proposed project would increase the population in the vicinity of the project site by approximately 2.6 percent, and the overall population of San Francisco by 0.11 percent. The population of San Francisco is projected to increase by approximately 280,490 persons for a total of 1,085,725 persons by 2040. The residential population introduced as a result of the proposed project would constitute approximately 0.33 percent of this population increase; therefore, this population increase would be accommodated within the planned growth for San Francisco. The proposed project also would not indirectly induce substantial population growth in the project area because it would be located on an infill site in an urbanized area and would not involve any extensions of roads or other infrastructure that could enable additional development in currently undeveloped areas; instead, the proposed project would implement a portion of the planned residential growth within the Market & Octavia Area Plan.

As also described in the Initial Study (Appendix A), the proposed retail/restaurant, office and assembly hall (UA Local 38 building), and affordable housing uses on the project site would result in total employment of about 67, with a net increase in on-site employment, compared to existing conditions, of approximately 14. Therefore, the proposed project would not generate substantial demand resulting from increased employment. In addition, the residential units proposed as part of the project could potentially accommodate some of the new employment-related housing demand generated by the proposed project.

In summary, the increase in the residential and employment population on the project site would not result in a substantial or unplanned increase in the population of the project vicinity or the city. Furthermore, the proposed project would not result in the extension of infrastructure into undeveloped areas; the extension of infrastructure systems beyond what is needed to serve project-specific demand; construction of a residential project in an area that is undeveloped or sparsely developed; or removal of obstacles to population growth (such as provision of major new public services to an area where those services are not currently available).

V.B Significant Environmental Effects of the Proposed Project

Table S-1, Summary of Impacts, Mitigation Measures, and Improvement Measures of the Proposed Project, which is contained in the *Summary*, and Sections IV.A and IV.B of this EIR provide a comprehensive identification of the proposed project's environmental effects, including the level of significance both before and after mitigation.

V.C Significant and Unavoidable Environmental Impacts

CEQA Guidelines Section 15126.2(b) requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Development of the proposed project would result in the following significant and unavoidable project-related and cumulative impacts, as further

discussed in Section IV.A, *Historical Architectural Resources*, and Section IV.B, *Transportation and Circulation*, of this EIR:

- The elimination of the single-story height and massing of the Lesser Brothers Building at 1629–1645 Market Street would cause a substantial adverse change in the significance of a historical resource, as defined in CEQA Guidelines Section 15064.5(b) and, therefore, would result in a significant and unavoidable impact to a historical resource. Four mitigation measures (**Mitigation Measures M-CR-1a through M-CR-1d**) were identified to address the impact; however, these mitigation measures would not reduce the impact to the historic resource to a less-than-significant level.
- The proposed project would contribute to cumulative construction-related transportation impacts and, therefore, would result in a significant and unavoidable cumulative impact to transportation and circulation. Three mitigation measures (**Mitigation Measures M-C-TR-8a through M-C-TR-8c**) were identified to address this impact; however, these mitigation measures would not reduce the cumulative construction-related impact to a less-than-significant level.

V.D Significant Irreversible Environmental Changes That Would Result If the Proposed Project Is Implemented

Pursuant to CEQA Guidelines Section 15126.2(c), an EIR must consider any significant irreversible environmental changes that would be caused by the proposed project should it be implemented. This includes use of nonrenewable resources (materials and energy) during construction and the energy and natural resources, including water, required for long-term operation of a project, in that such commitment of resources could make future removal or non-use of a project unlikely. It also includes "environmental accidents."

The project site is currently an urban site developed with three buildings and several surface parking lots that would be redeveloped as a new residential mixed-use project with on-site publicly-accessible open space. As such, no irreversible changes, such as those that might result from construction of a large-scale mining project or a hydroelectric dam project that specifically alters nonrenewable resources, would result from development of the proposed project.

Construction of the proposed project would require the use of energy, including energy produced from non-renewable resources, and energy would be consumed during the operational period of the proposed project. However, new buildings in California are required to conform to energy conservation standards specified in *California Code of Regulations* (CCR) Title 24, which are among the most stringent in the United States. The standards establish energy budgets for different types of residential and nonresidential buildings with which all new buildings must comply. In addition, to ensure that all buildings are healthy, sustainable places to live, work, and learn, the *San Francisco Green Building Code* requirements seek to reduce energy and water use, divert waste from landfills, encourage alternate modes of transportation, and support the health and comfort of building occupants in San Francisco. New construction in San Francisco must meet all applicable California and local building codes, provide on-site facilities for recycling and composting, and meet city green building requirements tied to the Leadership in Energy and Environmental Design (LEED) and GreenPoint Rated green building rating systems, all of which would ensure that natural resources are conserved or recycled to the maximum extent feasible and that greenhouse gas (GHG) emissions resulting from the project would be minimized. Even with implementation of conservation measures, the consumption of natural resources, including electricity and natural gas, would generally increase with implementation of the proposed project.

However, the proposed project would not involve the wasteful, inefficient, or unnecessary consumption of energy resources.

As further described in the Initial Study (Appendix A) under Topic E.10, *Utilities and Service Systems*, Impact UT-2, while the proposed project would incrementally increase the demand for water in San Francisco, the estimated increase in demand would be accommodated within available water supplies.[106] While potable water use would increase, the proposed project would be designed to incorporate water-conserving measures, such as low-flush toilets and urinals, as required by the San Francisco Green Building Ordinance and the City's Non-potable Water Ordinance. During construction activities, water may be used for soil compaction and dust control activities. However, as discussed under Topic E.6, *Air Quality*, of the Initial Study, *San Francisco Public Works Code* Article 21 restricts the use of potable water for soil compaction and dust control activities undertaken in conjunction, unless permission is obtained from the San Francisco Public Utilities Commission. Therefore, while the consumption of water would increase as the result of construction and operation of the proposed project, the proposed project not involve the wasteful, inefficient, or unnecessary use of water resources.

Construction and operational activities related to the proposed project would also result in the irretrievable commitment of fossil fuels for construction equipment and travel by construction workers, and for vehicles that travel to and from the completed project. Construction would occur over two phases and would last a total of approximately 44 months. Regarding operational use of fossil fuels, inasmuch as the proposed project would develop housing that is planned for under *Plan Bay Area* and the Market & Octavia Area Plan, fossil fuel use would likely result from travel to and from residential locations that would be located proximate to the project site regardless of whether this particular project were developed. Moreover, operational consumption of fossil fuels for transportation would not be wasteful because the project proposes to reduce transportation-related fuel use by implementing a number of bicycle and pedestrian improvements and constructing the project in proximity to mass transit and neighborhood-serving uses, which would reduce the total number of vehicle trips to and from the site, as well as overall trip lengths. Additionally, the proposed project would comply with the City's recently enacted Transportation Demand Management Ordinance. The proposed project would also consume fossil fuels for building heating, as well as for a portion of off-site electrical generation.

Development of the proposed project, an infill project within a developed urban area, would not substantially alter the pattern of land use or transportation in the project vicinity and, therefore, would not commit future generations of the project site and vicinity to any particular land use or transportation pattern, nor would it mean that the project site could not be feasibly redeveloped again at some unknown date in the future.

V.E Areas of Known Controversy and Issues to Be Resolved

Publication of the Notice of Preparation of an Environmental Impact Report (NOP) initiated a 30-day public comment period that began on February 9, 2017, and ended on March 13, 2017. A public scoping meeting was held on March 1, 2017. During the review and comment period, a total of five letters, emails, and comment cards were submitted to the Planning Department by interested parties, in addition to oral comments provided at the scoping meeting. The Planning Department has considered the comments made by the public in preparation of

[106] On September 27, 2016, the San Francisco Public Utilities Commission approved the Water Supply Assessment for the 1629 Market Street Mixed-Use Project (Appendix C in this EIR).

the Draft EIR for the proposed project. Comments on the NOP that relate to environmental issues are summarized below and are addressed in the Initial Study or in this EIR, as noted.

Comments generally related to several categories and issue topics, and the discussion below is organized into comments that relate to Land Use and Land Use Planning; Population and Housing; Cultural Resources; Transportation and Circulation; Noise; Air Quality; Wind and Shadow; Public Services; Biological Resources, Geology; and Hydrology and Water Quality.

An additional area of controversy may emerge regarding the provisions of CEQA Section 21099 as they relate to the proposed project and this EIR. Section 21099(d) directs that the aesthetic and parking impacts of mixed-use residential or employment center use infill projects located in transit priority areas are not considered impacts on the environment under CEQA. The proposed project meets the definition of a mixed-use residential and employment center use infill project in a transit priority area. Accordingly, this EIR does not contain a separate discussion of the topic of aesthetics. The EIR nonetheless provides visual simulations of the proposed project for informational purposes as part of Chapter II, *Project Description*.

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 CEQA Guidelines for determining transportation impacts pursuant to Section 21099(b)(1), automobile delay, as described solely by LOS 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*[107] (Proposed Transportation Impact Guidelines) recommending that transportation impacts for projects be measured using a VMT metric. VMT measures the amount and distance that a project might cause people to drive, accounting for the number of passengers within a vehicle.

OPR's Proposed Transportation Impact Guidelines provides substantial evidence that VMT is an appropriate standard to use in analyzing transportation impacts to protect environmental quality and a better indicator of greenhouse gas, air quality, and energy impacts than automobile delay. Acknowledging this, San Francisco Planning Commission Resolution 19579, adopted on March 3, 2016:

- Found that automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, shall no longer be considered a significant impact on the environment pursuant to CEQA, because it does not measure environmental impacts and therefore it does not protect environmental quality.
- Directed the Environmental Review Officer to remove automobile delay as a factor in determining significant impacts pursuant to CEQA for all guidelines, criteria, and list of exemptions, and to update the Transportation Impact Analysis Guidelines for Environmental Review and Categorical Exemptions from CEQA to reflect this change.

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

- Directed the Environmental Planning Division and Environmental Review Officer to replace automobile delay with VMT criteria that promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses; and consistent with proposed and forthcoming changes to the CEQA Guidelines by OPR.

Planning Commission Resolution 19579 became effective immediately for all projects that have not received a CEQA determination and all projects that have previously received CEQA determinations, but require additional environmental analysis.

Accordingly, this EIR does not contain a discussion of automobile delay impacts. Instead, a VMT and induced automobile travel impact analysis is provided in Section IV.B, *Transportation and Circulation*. Nonetheless, automobile delay may be considered by decision-makers, independent of the environmental review process, as part of their decision to approve, modify, or disapprove the proposed project.

(See Section IV.B, *Transportation and Circulation*, in this EIR for further discussion of CEQA Section 21099.)

V.E.1 Land Use and Planning

One comment was submitted regarding the proposed project's compatibility with surrounding land uses. This issue is addressed under Topic E.1, *Land Use and Land Use Planning*, in the Initial Study (Appendix A).

V.E.2 Population and Housing

One comment requested whether housing could be reserved for families and seniors, and that the environmental document identify what types of affordable housing the proposed project would provide. These issues are addressed under Topic E.2, *Population and Housing*, in the Initial Study (Appendix A) and in Chapter II, *Project Description*, in this EIR, respectively.

V.E.3 Cultural Resources

One comment requested study of the impact of the proposed project on the Market Street Masonry Historic District. This comment is addressed in Section IV.A, *Cultural Resources*, in this EIR.

V.E.4 Transportation and Circulation

Comments were submitted concerning construction-related traffic impacts; loading impacts as a result of increased deliveries to the area and transportation network companies; pedestrian safety during construction; traffic impacts on Brady Street; and the use of VMT as a metric for analyzing transportation impacts. Two comments requested that the EIR evaluate the feasibility of adopting an alternative where parking is reduced or eliminated entirely. One comment requested a bulbout at the corner of Brady and Market Streets, and another asked if the Stevenson Street entrance to the below-grade garage would be large enough to accommodate vehicles and trucks.

The proposed project's potential transportation-related impacts are discussed in Section IV.B, *Transportation and Circulation*, of this EIR. The Transportation Impact Study is available for review as part of Case File No. 2015-

005848ENV. The proposed project's consistency with the City's parking requirements is discussed in Section C, *Compatibility with Existing Zoning and Plans*, of the Initial Study (Appendix A). Alternatives to the project are discussed in Chapter VI, *Alternatives*, of this EIR.

V.E.5 Noise

Comments were submitted concerning the effects of traffic-generated noise by construction of the proposed project, as well as increased operational noise. The proposed project's potential noise impacts are discussed in under Topic E.5, *Noise*, of the Initial Study (Appendix A).

V.E.6 Air Quality

Comments were submitted concerning the effects of traffic generated by the proposed project and project construction on air quality. The proposed project's potential air quality impacts are discussed under Topic E.6, *Air Quality*, of the Initial Study (Appendix A).

V.E.7 Wind and Shadow

Comments were submitted requesting that the EIR discuss the shadow impacts of the proposed project on nearby public and private open spaces, as well changes to wind patterns around the project site. Analyses of these potential effects are provided under Topic E.8, *Wind and Shadow*, of the Initial Study (Appendix A).

V.E.8 Public Services

One comment was submitted asking if new public schools will be built in the area to support the new residential population introduced by the proposed project. This issue is addressed in under Topic E.11, *Public Services*, in the Initial Study (Appendix A).

V.E.9 Geology and Soils

A comment was submitted requesting that the EIR address dewatering and the type of excavation that would be conducted for the proposed project. This issue is addressed in under Topic E.13, *Geology and Soils*, in the Initial Study (Appendix A).

V.E.10 Hydrology and Water Quality

One comment was submitted requesting the EIR to address whether flooding would occur on the site during a rain event. This issue is addressed in under Topic E.14, *Hydrology and Water Quality*, in the Initial Study (Appendix A).

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CHAPTER VI

Alternatives

VI.A Introduction

The following discussion evaluates alternatives to the proposed project and examines the potential environmental impacts associated with each alternative. Through comparison of these alternatives to the proposed project, the relative environmental advantages and disadvantages of each may be analyzed and weighed. CEQA Guidelines Section 15126.6(a) states that an EIR must describe and evaluate a reasonable range of alternatives to the proposed project that would feasibly attain most of the proposed project's basic objectives, and would avoid or substantially lessen any identified significant adverse environmental impacts of the proposed project.

The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those potentially feasible alternatives necessary to foster informed public participation and an informed and reasoned choice by the decision-making body (CEQA Guidelines Section 15126.6(f)). CEQA generally defines "feasible" to mean the ability to be accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors. The following factors may also be taken into consideration when assessing the feasibility of alternatives: site suitability; economic viability; availability of infrastructure; *General Plan* consistency; other plans or regulatory limitations; jurisdictional boundaries; and the ability of the proponent to attain site control (CEQA Guidelines Section 15126.6(f)(1)). An EIR need not consider an alternative whose impact cannot be reasonably ascertained and whose implementation is remote and speculative. Furthermore, an EIR need not consider every conceivable alternative, but must consider a reasonable range of alternatives that will foster informed decision-making and public participation.

CEQA also requires a No Project Alternative to be evaluated (CEQA Guidelines Section 15126.6(e)). The analysis of the No Project Alternative is based on the assumption that the proposed project would not be approved. In addition, an environmentally superior alternative must be identified among the alternatives considered. The environmentally superior alternative is generally defined as the alternative that would result in the least adverse environmental impacts to the project site and affected environment. If the No Project Alternative is found to be the environmentally superior alternative, the EIR must identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6(e)(2)). CEQA Guidelines Section 15126.6(c) also requires an EIR to identify and briefly discuss any alternatives that were considered by the Lead Agency but were rejected as infeasible during the scoping process; no such alternatives were identified here. In identifying alternatives, primary consideration was given to alternatives that would reduce significant impacts while still meeting most of the basic proposed project objectives.

The EIR must evaluate the comparative merits of the alternatives and include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. In identifying

alternatives, the consideration of alternatives should focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant impacts of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines Section 15126.6(b)). This chapter identifies alternatives to the proposed project and discusses environmental impacts associated with each alternative.

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

VI.A.1 Significant Project Impacts and Alternative Analysis

The EIR alternatives analysis discusses alternatives aimed at reducing significant and unavoidable impacts identified in Chapter IV, *Environmental Setting, Impacts, and Mitigation Measures*, of this EIR. It also provides a brief discussion of those impacts identified as less than significant after mitigation, and addresses those topics analyzed in the Initial Study.

This EIR identifies significant and unavoidable impacts on historical architectural resources and cumulative construction-related transportation impacts. With regard to cultural resources, Impact CR-1 identifies a significant and unavoidable impact after mitigation, in that the proposed project would demolish a majority of the Lesser Brothers Building, and thereby result in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(b). This EIR also identifies a cumulative construction-related transportation impact that is significant and unavoidable after mitigation, Impact C-TR-8 (cumulative construction-related transportation effects on transit, pedestrian, and bicycle circulation).

In addition to evaluating significant and unavoidable impacts, this analysis also briefly evaluates the alternatives to determine whether they would reduce the severity of or avoid other proposed project impacts identified as having impacts that would be less than significant with mitigation. These consist of impacts identified in the Initial Study and are related to cultural resources, noise, air quality, geology and soils (refer to the Initial Study for Impact CR-6, Impact CR-7, Impact CR-8, and Impact C-CR-2, Impact NO-1, Impact NO-2, Impact C-NO-1, Impact AQ-3, Impact C-AQ-1, Impact GE-3, and Impact GE-6).

VI.A.2 Discussion of Alternatives

Section IV.B sets forth the alternatives analyzed in this chapter. Section VI.C, *Alternatives Analysis*, presents the approach and methodology of the proposed project alternatives analysis, as well as a detailed evaluation of the selected alternatives, and Subsection VI.D identifies the environmentally superior alternative.

In accordance with the CEQA Guidelines, an alternatives analysis must address alternatives that meet the following three criteria: (1) the alternative would attain most of a project's basic objectives; (2) the alternative would avoid or substantially lessen one or more of the significant environmental impacts of the proposed project; and (3) the alternative must be potentially feasible.

VI.B Selected CEQA Alternatives

This section describes the project-specific alternatives that were selected and analyzed in detail. The first alternative, the No Project Alternative, is required under the CEQA Guidelines. Two additional alternatives were developed following identification of significant impacts associated with the proposed project. As set forth above under Section VI.A.1, *Significant Project Impacts and Alternative Analysis*, the significant and unavoidable impact that these alternatives address is the project-specific impact on historical architectural resources, Impact CR-1. Although the proposed project would make a considerable contribution to the significant, unavoidable cumulative construction-related transportation impact, Impact C-TR-8, for the following reasons this impact was not considered in the development of project alternatives. This cumulative construction-related transportation impact is a function of the many other projects proposed in the vicinity of one intersection, Market Street and Van Ness Avenue, as well as some recently approved projects in the vicinity of the project site. Because this cumulative impact would be reduced in severity to the maximum feasible extent through implementation of **Mitigation Measures M-C-TR-8a, Non-Peak Construction Traffic Hours**; **M-C-TR-8b, Construction Management Plan**; and **M-C-TR-8c – Cumulative Construction Coordination**, and because other mitigation measures, such as imposing sequential (i.e., non-overlapping) construction schedules for all projects in the vicinity, were considered, but deemed infeasible due to potentially lengthy delays in project implementation, this impact was not considered in the development of project alternatives. No other significant, unavoidable project-specific impacts are identified.

The alternatives selected for detailed analysis in this EIR are as follows:

- Alternative A: No Project Alternative;
- Alternative B: Full Preservation Alternative; and
- Alternative C: Partial Preservation Alternative.

Table VI-1, Comparison of Proposed Project and Alternatives, p. VI-4, provides a comparison of the alternative features. In addition, **Table VI-2, Comparison of the Significant Environmental Impacts of Project to Impacts of Alternatives**, p. VI-23, presents a comparative summary of the impacts associated with the alternatives.

TABLE VI-1 COMPARISON OF PROPOSED PROJECT AND ALTERNATIVES

Project Feature	Proposed Project	Alternative A: No Project Alternative	Alternative B: Full Preservation Alternative	Alternative C: Partial Preservation Alternative
Building Components				
Building A (*Lesser Brothers Building*)	**198 units**	**—**	**134 units**	**163 units**
Residential	187,100 sf	—	130,500 sf	144,700 sf
Retail/Restaurant	6,600 sf	13,000 sf	13,900 sf	7,900 sf
Open Space	4,600 sf	—	4,600 sf	4,600 sf
Building B	**136 units**	**—**	**136 units**	**136 units**
Residential	118,300 sf	—	118,300 sf	118,300 sf
Retail/Restaurant	2,500 sf	—	2,500 sf	2,500 sf
Open Space	2,600 sf	—	2,600 sf	2,600 sf
Building C (*Civic Center Hotel*)	**65 units**	**152 units**	**65 units**	**65 units**
Residential	67,200 sf	67,200 sf	67,200 sf	67,200 sf
Retail/Restaurant	4,000 sf	—	4,000 sf	4,000 sf
Open Space	—	—	—	—
Building D	**78 units**	**—**	**78 units**	**78 units**
Residential	74,700 sf	—	74,700 sf	74,700 sf
Retail/Restaurant	—	—	—	—
Open Space	1,500 sf	—	1,500 sf	1,500 sf
Colton Street Affordable Housing	**Up to 107 units**	**—**	**Up to 107 units**	**Up to 107 units**
Residential	50,900 sf	—	50,900 sf	50,900 sf
Open Space	600 sf	—	600 sf	600 sf
UA Local 38 Building	**27,300 sf**	**24,100 sf**	**27,300 sf**	**27,300 sf**
Brady Open Space & mid-block alley	**23,500 sf**	**—**	**23,500 sf**	**23,500 sf**
Combined Project				
Total Units	**584 units**	**152 units**	**520 units**	**549 units**
Total Residential	498,100 sf	67,200 sf	441,600 sf	455,800 sf
Retail/ Restaurant	13,000 sf	13,000 sf	20,300 sf	14,400 sf
Publicly-Accessible Open Space	23,500 sf	—	23,500 sf	23,500 sf
Vehicle Parking	316 spaces	242 spaces	296–301 spaces	296–301 spaces
Bicycle Parking (Class 1/ Class 2)	231 spaces / 42 spaces	—	215 spaces / 39 spaces	222 spaces / 41 spaces

SOURCE: David Baker Architects and Kennerly Architects, September 2016.
NOTES: Columns may not add due to rounding.
sf = square feet

VI.C Alternatives Analysis

VI.C.1 Alternative A: No Project Alternative

Description

Under the No Project Alternative, the site would remain in its existing condition. The buildings on the project site would not be altered, and the proposed new residential and retail/restaurant uses would not be developed. For purposes of this analysis, it is assumed that the existing UA Local 38 Building would remain in use as office and assembly space, with 24,100 square feet as under existing conditions, and the Lesser Brothers Building would remain in retail use, with the same 13,000 square feet as under existing conditions. It is further assumed that the Civic Center Hotel would continue to be used as a Navigation Center and residential use (140 single-room occupancy dwelling units and 12 additional vacant units) for the foreseeable future. Existing on-site parking lots would also remain unaltered.

This alternative would not preclude development of another project on the project site should such a proposal be put forth by the project sponsor or another entity.

Ability to Meet Project Objectives

Under the No Project Alternative, the physical environment of the project site would remain unchanged. Therefore, the No Project alternative would fail to meet the project sponsor's objectives.

Impacts

Historic Architectural Resources

The No Project Alternative would result in the continuation of the existing uses on the project site. Under this continued use, the existing historic Lesser Brothers Building at 1629–1645 Market Street would remain intact and unaltered, as would the historic Civic Center Hotel. As the No Project Alternative would entail no construction, there would be no potential for adverse effects to the Path of Gold Light Standards or adjacent historical architectural resources. This alternative would thus result in no impacts to historic architectural resources, and therefore would avoid the proposed project's significant and unavoidable impact that would result from the effective demolition of the Lesser Brothers Building. This alternative would also avoid the proposed project's significant but mitigable construction-related impacts on the Civic Center Hotel, on the portion of the Lesser Brothers Building proposed to be retained under the project, and on adjacent historical resources at 42 12th Street and 56–70 12th Street. **Mitigation Measures M-CR-1a, HABS Documentation**; **M-CR-1b, Interpretive Display**; **M-CR-1c, Protect On-Site Historical Resources from Construction Activities**; **M-CR-1d, Construction Monitoring Program for On-Site Historical Resources**; **M-CR-4a, Protect Adjacent Historical Resources from Construction Activities**; and **M-CR-4b, Construction Monitoring Program for Adjacent Historical Resources**, would not apply to the No Project Alternative.

Transportation and Circulation: Cumulative Construction Impacts

Under this alternative, with existing uses retained, transportation and circulation conditions would remain as they are under the existing setting. The No Project Alternative would not generate construction-related truck traffic or worker trips to and from the project site. Therefore, this alternative would not contribute to the significant cumulative construction-related transportation impact on transit, pedestrian, and bicycle circulation that would result from other construction projects in the vicinity. While this significant cumulative construction-related transportation impact would be anticipated to occur regardless of whether the proposed project were undertaken, under the No Project Alternative, the proposed project would make no contribution to this impact, and thus this alternative would avoid the proposed project's considerable contribution to this significant and unavoidable cumulative construction-related transportation impact. In addition, the No Project alternative would result in no increase in operational travel to and from the project site, and therefore would have no project-specific or cumulative impact on vehicle miles traveled, traffic hazards, pedestrian or bicycle travel, loading, emergency vehicle access, or project-specific construction. Each of these impacts as a result of the proposed project was determined to be less than significant. **Mitigation Measures M-C-TR-8a, Non-Peak Construction Traffic Hours**; **M-C-TR-8b, Construction Management Plan**; and **M-C-TR-8c, Construction Coordination**, would not apply to the No Project Alternative.

Issues Analyzed in the Initial Study

Other issues related to the intensity of development identified in the Initial Study include population and housing, operational noise, greenhouse gas emissions, wind and shadow, recreation, utilities and service systems, and public services. There would be no impacts with respect to these issues under this alternative, given the lack of development at the site and the assumption that any subsequent reuse of the existing facilities would be at a comparable intensity as the current use. Similarly, with no construction, there would be no construction-generated noise or air quality impacts, or risk for impact to archeological resources, human remains, and tribal cultural resources, and there would be no potential exposure of construction workers and the public to hazardous building materials or subsurface contamination. Likewise, the No Project Alternative would result in no impacts related to the footprint and location of development, including land use, biological resources, geology and soils, hydrology and water quality, hazards and hazardous materials, mineral resources, and agricultural/forest resources. Given the No Project Alternative would result in no impacts related to any of the above-listed environmental topics, this alternative would result in no changes to existing site conditions. **Mitigation Measures M-CR-6, Archeological Testing**; **M-CR-7, Inadvertent Discovery of Human Remains**; **M-CR-8, Tribal Cultural Resources Interpretive Program**; **M-NO-1, Acoustical Assessment of Mechanical, Electrical, and Plumbing (MEP) Equipment**; **M-NO-2, Construction Noise Reduction**; **M-AQ-3, Construction Air Quality**; **M-GE-3a, Design Approval and Construction Monitoring for BART Subway Structure**; **M-GE-3b, Monitoring of Adjacent Structures in the Event of Dewatering; and M-GE-6, Inadvertent Discovery of Paleontological Resources** would not apply to the No Project Alternative.

VI.C.2 Alternative B: Full Preservation Alternative

Description

The Full Preservation Alternative would develop the project site in the same manner as the proposed project, with the exception of Building A, including the Lesser Brothers Building, a historical resource under CEQA. Whereas the proposed project would demolish a majority of the Lesser Brothers Building, the Full Preservation Alternative would retain the entirety of the Lesser Brothers Building, add a partial, approximately nine-foot-tall, single-story addition atop this building, and construct a smaller new residential building (Building A) behind (south of) the historic Lesser Brothers Building, approximately 60 feet south of Market Street. The existing Lesser Brothers Building would contain retail/restaurant uses, while the single-story addition would be devoted to residential use and would be physically connected to the new construction to the south. To minimize effects on the historical resource, the single-story addition to the Lesser Brothers Building would be set back 15 feet from the building's principal Market Street façade, 15 feet from the west (Brady Street) façade, and about eight feet from the east façade. Consistent with the Secretary of the Interior's Standards for Rehabilitation, the addition would be compatible with the scale, massing, and design of the Lesser Brothers Building, but sufficiently differentiated so as to avoid creating a sense of false historicism. Like the proposed project, this alternative would retain all of the character-defining features of the Lesser Brothers Building's Market Street façade, including the stucco-finished wall surfaces; the piers separating the storefronts; the wood-frame transom windows above the storefronts; the frieze; and the cornice/pent-roofed parapet, all of which would be retained, preserved, and repaired as necessary. As with the proposed project, this alternative would replace the existing altered storefronts with compatible new storefronts. Unlike the proposed project, however, this alternative would generally retain the Lesser Brothers Building's single-story height and massing, also a character-defining feature, because the partial second story addition would be set back sufficiently such that, from sidewalks adjacent to the proposed project, the vertical addition would not be visible. Other components of the Full Preservation Alternative would be developed in the same manner as under the proposed project.

As shown in **Table VI-1, Comparison of Proposed Project and Alternatives**, the Full Preservation Alternative would provide 520 dwelling units, 11 percent (64 units) fewer than with the proposed project as a result of the reduced size of the new residential Building A, compared to the proposed project. The Colton Street Affordable Housing building would be the same as under the proposed project, with up to 107 dwelling units. With the modifications to preserve the Lesser Brothers Building, this alternative would result in an increase in the total project retail/restaurant square footage to 20,300 square feet, or 56 percent (7,300 square feet) more than with the proposed project. All residential development at Buildings B, C (Civic Center Hotel), D, and the Colton Street Affordable Housing building would remain as described in the proposed project.

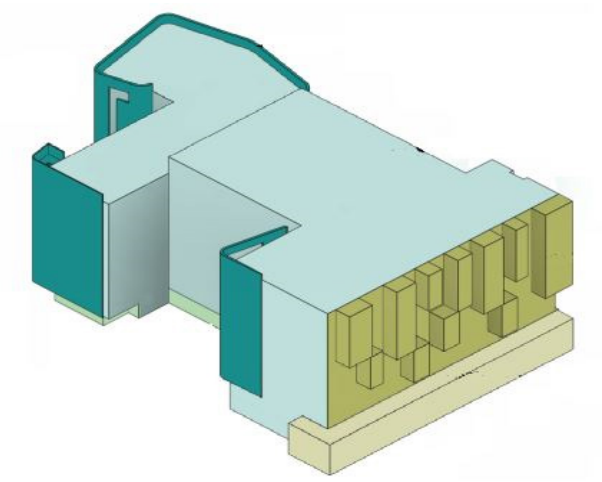
With the preservation of the Lesser Brothers Building, there would be no underground excavation or parking structure developed within its footprint. As such, parking under this alternative would be reduced by an estimated 15 to 20 vehicle spaces, compared to the proposed project, for between 296 and 301 spaces, and bicycle parking would be reduced by an estimated 16 Class 1 and two Class 2 spaces. Loading would remain as under the proposed project. Access to the two-level below-grade parking garage would be provided consistent with the proposed project with an entrance from Brady Street to the garage under Building A, and from Stevenson Street, to the garage under Building B.

Figure VI-1, Comparison of Alternatives' Treatment of Lesser Brothers Building, p. VI-9, presents a side-by-side comparison of massing diagrams of the proposed project and each of the alternatives' treatment of this historical resource. **Figure VI-2, Alternative B: Full Preservation Alternative Floor Plans (Building A)**, p. VI-10; **Figure VI-3, Alternative B: Full Preservation Alternative Elevations (Building A)**, p. VI-11; and **Figure VI-4, Alternative B: Full Preservation Alternative Rendering from Market Street**, p. VI-12, present illustrations of this alternative.

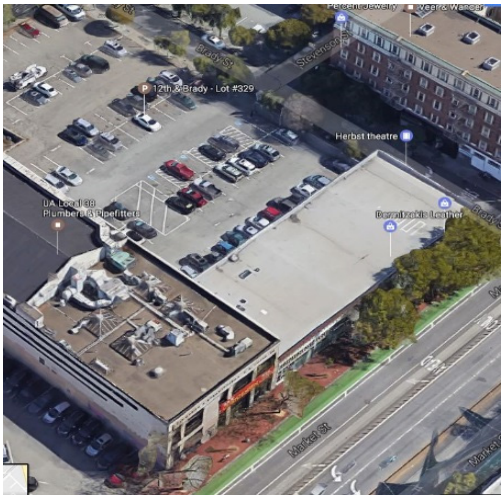
Ability to Meet Project Objectives

The Full Preservation Alternative would meet most of the project sponsor's basic objectives, although in some cases to a lesser degree than would the proposed project, including: develop a mixed-use project on an underutilized but transit-oriented infill site; create a mixed-use, mixed-income community that includes on-site market-rate, inclusionary below-market-rate, and supportive housing, along with neighborhood-serving retail and new labor union facilities; develop at an intensity and density that takes advantage of the transit resources in the area and allows the proposed project to remain financially feasible while delivering on-site public benefits; produce high-quality architectural and landscape design; build a transit-oriented, sustainable development; preserve the character-defining features of the Civic Center Hotel and retain and renovate portions of the Lesser Brothers Building; provide affordable housing on the Colton Street portion of the project site at sufficient density to support on-site social and health services; develop a new facility for the UA Local 38, including offices and union assembly space; fulfill key Market & Octavia Area Plan objectives regarding the network of neighborhood-serving open space and pedestrian passageways; and encourage pedestrian access to the on-site open space by creating mid-block alleyways and other streetscape improvements (Objectives 1 through 10). However, by reducing the size of the residential component of Building A by 64 units, this alternative would provide 11 percent fewer residential units than would the proposed project, with a corresponding reduction in affordable housing units.

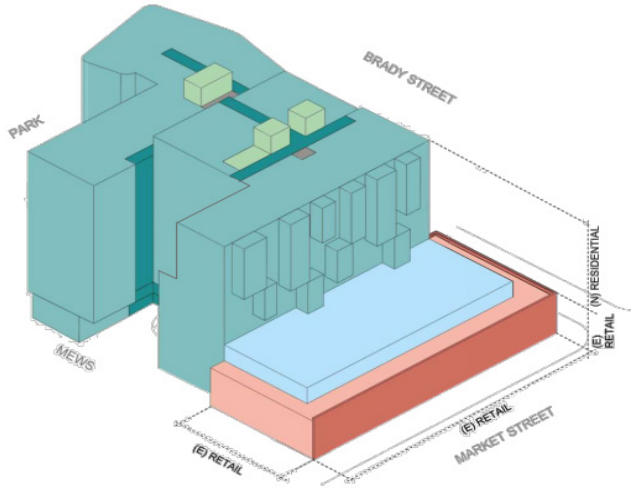
As a result of the reduction in the number of residential units, this alternative would not fully meet the project sponsor's objective of developing the site at an intensity and density that takes advantage of area transit resources. This alternative would detract from the project sponsor's objective of providing on-site affordable housing. The modified design of the proposed project under the Full Preservation Alternative would partially meet the project sponsor's objective of producing high-quality architectural and landscape design that contributes to Market Street's vibrancy through strong urban design and prominent corners at 12th and Brady Streets, although to a lesser degree than would the proposed project because the new Building A would be constructed 60 feet back from the Market and Brady Street corner. Therefore, this alternative would meet most of the project sponsor's basic objectives although in some instances to a lesser degree than would the proposed project.



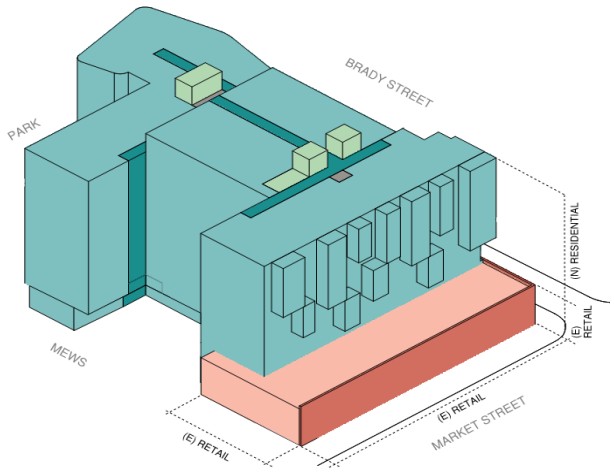
Proposed Project (as submitted in CU Application)



Alternative A: No Project



Alternative B: Full Preservation Alternative

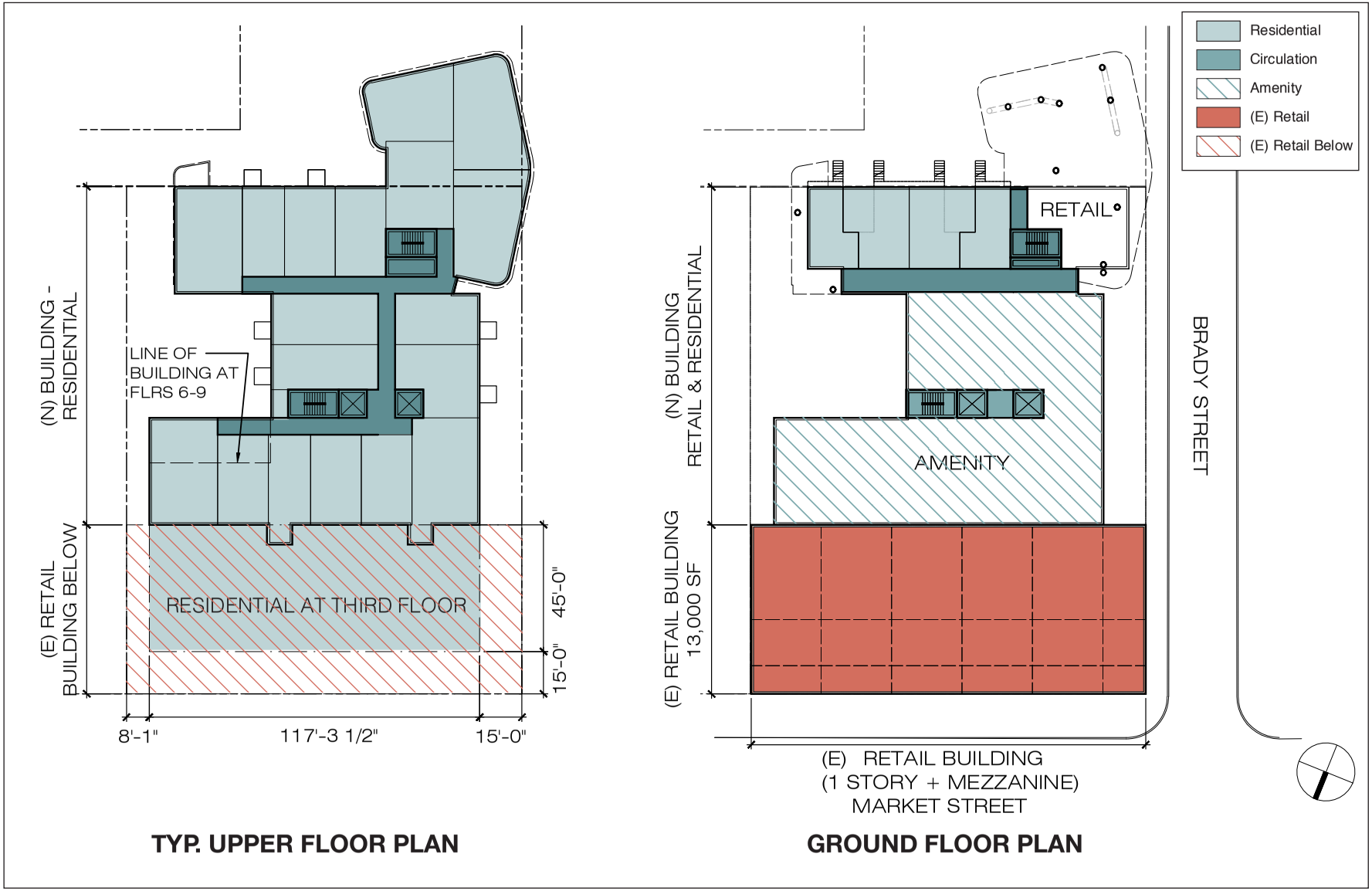


Alternative C: Partial Preservation Alternative

SOURCE: Kennerly Architecture & Planning

1629 Market Street: Case No. 2015-005848ENV

Figure VI-1
Comparison of Alternatives' Treatment of Lesser Brothers Building

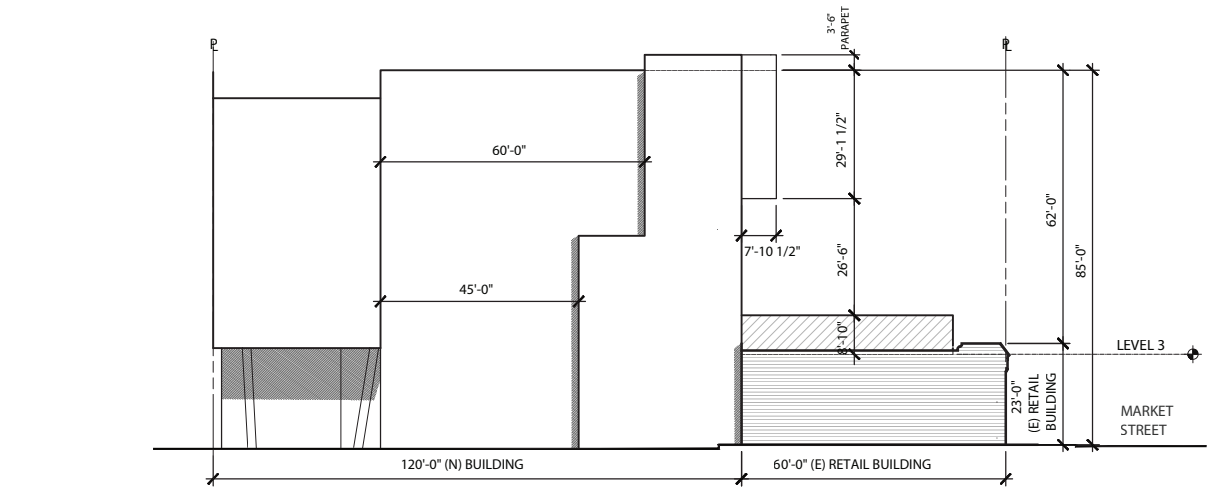


SOURCE: Kennerly Architecture & Planning

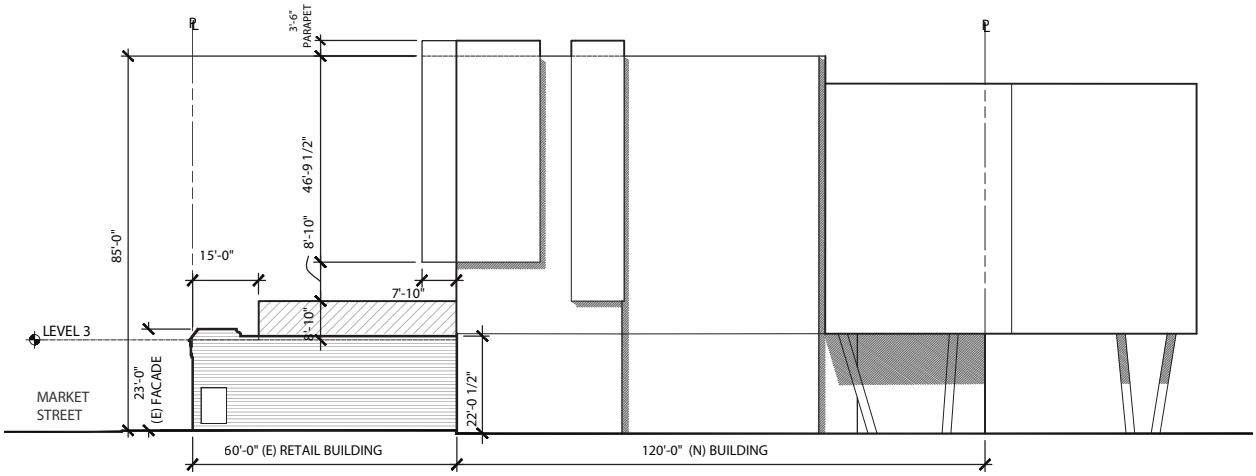
1629 Market Street: Case No. 2015-005848ENV

Figure VI-2

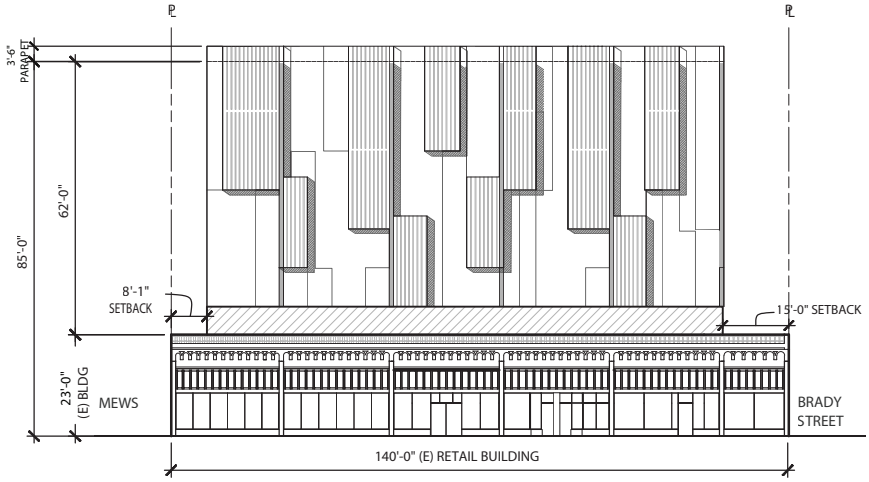
Alternative B: Full Preservation Alternative Floor Plans (Building A)



MEWS ELEVATION



BRADY STREET ELEVATION

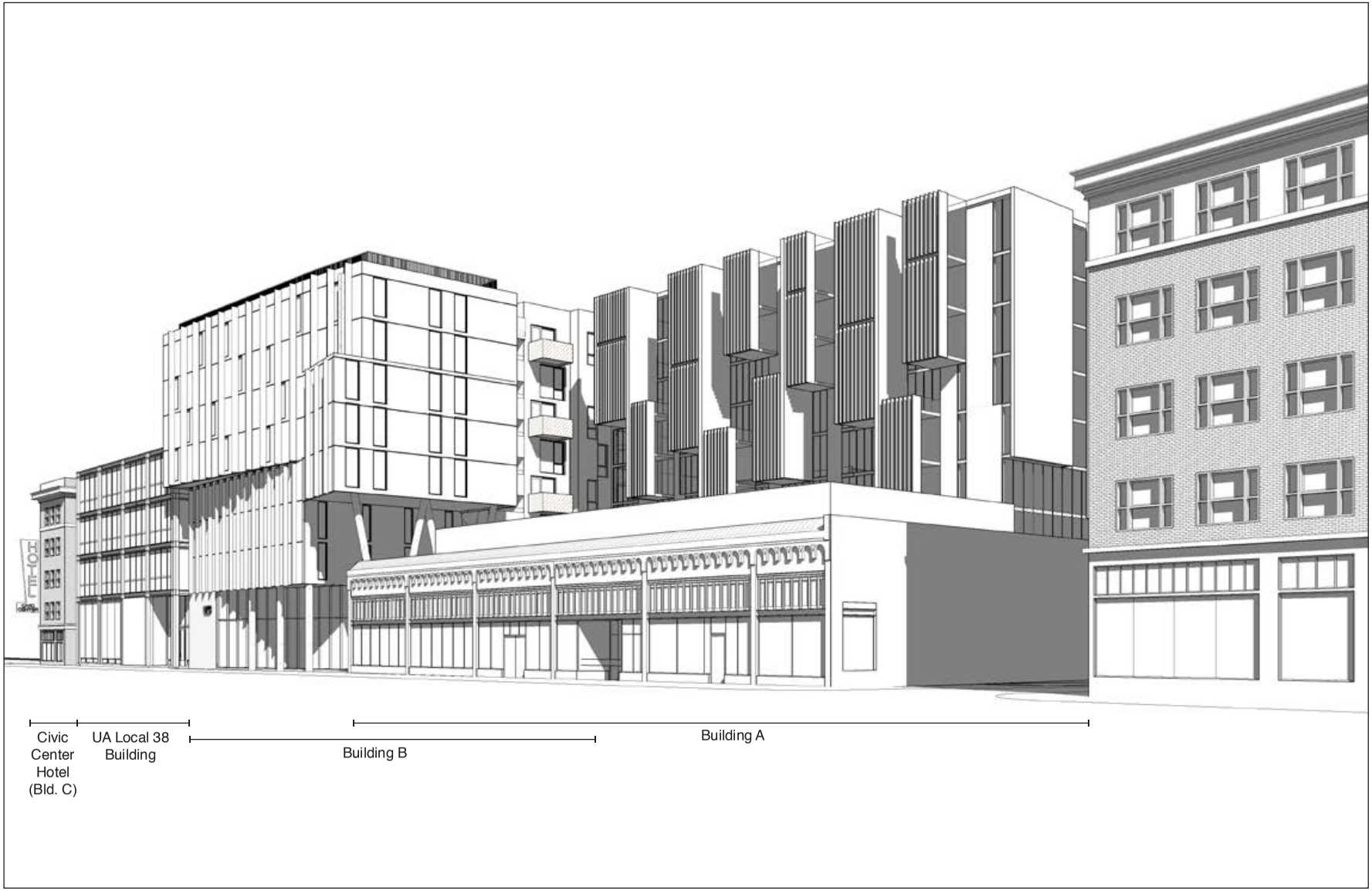


MARKET STREET ELEVATION

1500 Mission Street; Case No. 2014-000362ENV

SOURCE: Kennerly Architecture & Planning

Figure VI-3
Alternative B: Full Preservation
Alternative Elevations (Building A)



1629 Market Street: Case No. 2015-005848ENV

SOURCE: Kennerly Architecture & Planning

Figure VI-4

Alternative B: Full Preservation Alternative Rendering from Market Street

Impacts

Historical Architectural Resources

The Full Preservation Alternative would avoid the proposed project's significant and unavoidable impact on the Lesser Brothers Building by maintaining the entirety of this historical resource, including the character-defining features on its Market Street façade, as well as its single-story height and massing, also a character-defining feature. The Full Preservation Alternative would construct an approximately nine-foot-tall, single-story vertical addition and place the new residential Building A behind the Lesser Brothers Building (only the single-story residential addition would be physically connected with the new Building A). Because the Full Preservation Alternative would involve no demolition of the historic Lesser Brothers Building, and no subterranean excavation beneath the Lesser Brothers Building for below-grade parking, this alternative would not significantly alter the historic architectural resource, which would therefore retain integrity of location, design, setting (in part), materials, workmanship, and feeling (in part). The new Building B, 85 feet tall and to the east of the Lesser Brothers Building, would be separated from the Lesser Brothers Building by the mid-block alley, which would also avoid any adverse impacts on this building. Accordingly, the Full Preservation Alternative would not materially impair the historical significance of the Lesser Brothers Building because the resource would retain sufficient integrity such that the physical characteristics that convey its historical significance and that justify its eligibility for inclusion in the California Register would, in large part, be retained. As such, the Full Preservation Alternative would result in a less-than-significant impact on the historic Lesser Brothers Building. Like the proposed project, the Full Preservation Alternative could result in construction-related vibration impacts on both on-site and adjacent historical resources, including the Civic Center Hotel, the Lesser Brothers Building, and adjacent historical resources at 42 12th Street and 56–70 12th Street. Also as with the proposed project, these impacts would be reduced to a less-than-significant level through implementation of **Mitigation Measures M-CR-1c, Protect On-Site Historical Resources from Construction Activities**; **M-CR-1d, Construction Monitoring Program for On-Site Historical Resources**; **M-CR-4a, Protect Adjacent Historical Resources from Construction Activities**; and **M-CR-4b, Construction Monitoring Program for Adjacent Historical Resources**, all of which would apply to the Full Preservation Alternative. **Mitigation Measures M-CR-1a, HABS Documentation**, and **M-CR-1b, Interpretive Display**, would not apply to the Full Preservation Alternative because this alternative would result in a less-than-significant design-related impact on the Lesser Brothers Building. As with the proposed project, impacts on other historical resources, including the Civic Center Hotel and the Path of Gold Light Standards, would be less than significant.

Transportation and Circulation: Cumulative Construction Impacts

As with the proposed project, the Full Preservation Alternative, in combination with past, present and reasonably foreseeable development in the project vicinity, would result in a significant cumulative construction-related transportation impact on transit, pedestrian, and bicycle circulation, and the Full Preservation Alternative would contribute considerably to this cumulative construction-related transportation impact, like the proposed project. As with the proposed project, implementation of **Mitigation Measures M-C-TR-8a, Non-Peak Construction Traffic Hours**; **M-C-TR-8b, Construction Management Plan**; and **M-C-TR-8c, Construction Coordination**, would reduce the severity of the cumulative construction-related transportation impact. However, this impact, described further in Impact C-TR-8, would remain significant and unavoidable with mitigation. The Full Preservation Alternative, because of its greater retail/restaurant space as

compared to the proposed project, would result in approximately six percent more daily vehicle trips than would the proposed project; pedestrian and bicycle trips would also increase. However, transit ridership would be similar to that under the proposed project. These changes would result in slight operational changes as compared to those described in Section IV.B, *Transportation and Circulation*, but not would not result in any new significant impacts or substantially more severe impacts on vehicle miles traveled, traffic hazards, pedestrian or bicycle travel, loading, or emergency vehicle access as compared to those that would occur with the proposed project. All of these impacts were found to be less than significant in the case of the proposed project, either individually or cumulatively, and the same would hold true for this alternative.

Issues Analyzed in the Initial Study

Issues related to the intensity of development as identified in the Initial Study, including population and housing, recreation, utilities and service systems, and public services would be incrementally reduced with this alternative, compared to those under the proposed project, given the overall decrease in the development program, in terms of building square footage and operations. As with the proposed project, these impacts would be less than significant. Impacts related to operational noise, air quality, greenhouse gas emissions, and energy resources would be incrementally smaller with respect to the buildings themselves, but incrementally greater with respect to effects secondary to vehicle travel, compared to those of the proposed project. However, these impacts would be less than significant, as with the proposed project.

Issues related to the massing of the development—notably wind and shadow—would result in similar or lesser effects compared to those of the proposed project. In particular, the 60-foot setback from Market Street of the new residential Building A—behind the existing footprint of the Lesser Brothers Building—could result in incrementally smaller wind impacts along the Market Street frontage because this alternative would not develop an 85-foot-tall structure within 10 feet of the corner of Market and Brady Streets. Wind impacts elsewhere would be similar to those of the proposed project. Shadow impacts would be similar to those of the proposed project, except immediately north of and adjacent to the Lesser Brothers Building, where shadow impacts would be incrementally smaller due to the decreased massing of this alternative. Wind and shadow impacts would be less than significant, as with the proposed project.

Other issues related to the footprint and location of development, land use and land use planning, hazards and hazardous materials, mineral resources, and agricultural/forest resources, would be very similar to or the same as impacts of the proposed project, given that comparably sized structures would be developed at the same location as under the proposed project; these impacts would be less than significant, as with the proposed project.

Construction-related activity associated with development of the project site would result in comparable impacts to those of the proposed project related to archeological resources, noise, air quality, geology and soils, and hydrology and water quality, as excavation and construction would be similar, though incrementally lesser in scale. **Mitigation Measures M-CR-6, Archeological Testing**; **M-CR-7, Inadvertent Discovery of Human Remains**; and **M-CR-8, Tribal Cultural Resources Interpretive Program**, would reduce impacts on subsurface cultural resources to a less-than-significant, as with the proposed project. Similarly, construction related noise impacts would be reduced to a less-than-significant level with implementation of **Mitigation Measures M-NO-1, Acoustical Assessment of Mechanical, Electrical, and Plumbing (MEP) Equipment**, and **M-NO-2, Construction Noise Reduction**, as with the proposed project. Construction-related impacts to air quality would be significant but reduced to a less-than-significant level with implementation of **Mitigation Measure M-AQ-3,**

Construction Air Quality. Excavation activity and foundation construction at the project site could result in impacts to the integrity of BART's underground tunnels and to paleontological resources, but these impacts would be reduced to a less-than-significant level, as with the proposed project, through implementation of **Mitigation Measures M-GE-3, Design Approval and Construction Monitoring for BART Subway Structure**; **M-GE-3b, Monitoring of Adjacent Structures in the Event of Dewatering;** and **M-GE-6, Inadvertent Discovery of Paleontological Resources**. Each of the foregoing mitigation measures would be applicable to the Full Preservation Alternative.

VI.C.3 Alternative C: Partial Preservation Alternative

Description

Like the Full Preservation Alternative, the Partial Preservation Alternative would develop the project site in the same manner as the proposed project, with the exception of Building A, including the Lesser Brothers Building, a historical resource under CEQA. Whereas the proposed project would demolish a majority of the Lesser Brothers Building, and would set back the new construction by 10 feet from the building's principal Market Street façade, the Partial Preservation Alternative would set back the new construction by 30 feet from the Market Street façade. Side setbacks would be the same as with the proposed project—about eight feet on the east and three feet on the west. This alternative would retain approximately 55 percent of the volume of the Lesser Brothers Building, and this portion would contain retail/restaurant uses. Like the proposed project and the Full Preservation Alternative, the Partial Preservation Alternative would retain all of the character-defining features of the Lesser Brothers Building's Market Street façade, including the stucco-finished wall surfaces; the piers separating the storefronts; the wood-frame transom windows above the storefronts; the frieze; and the cornice/pent-roofed parapet, all of which would be retained, preserved, and repaired as necessary. As with the proposed project and the Full Preservation Alternative, this alternative would replace the existing altered storefronts with compatible new storefronts. Also like the proposed project, this alternative would not retain the Lesser Brothers Building's single-story height and massing, also a character-defining feature. This alternative would construct a seven-story vertical addition that would rise more than 60 feet above the retained portion of the 23-foot-tall Lesser Brothers Building, although the new construction would be set back 20 additional feet from Market Street, as described above. Other components of the Partial Preservation Alternative would be developed in the same manner as under the proposed project.

As shown in **Table VI-1, Comparison of Proposed Project and Alternatives**, the Partial Preservation Alternative would provide 549 dwelling units, or six percent (35 units) fewer than with the proposed project as a result of the reduced size of the new residential Building A. The Colton Street Affordable Housing building would be the same as under the proposed project, with up to 107 dwelling units. This alternative would result in 14,400 square feet of total project retail/restaurant space, or 11 percent (1,400 square feet) more than with the proposed project. All residential development for Buildings B, C (Civic Center Hotel), D, and the Colton Street Affordable Housing building would remain as described in the proposed project.

Like the Full Preservation Alternative, the Partial Preservation Alternative would have no underground excavation or parking garage developed under the Lesser Brothers Building. As such, parking under this alternative would be reduced by an estimated 15 to 20 vehicle spaces as compared to the proposed project, or between 296 and 301 spaces, while bicycle parking would be reduced by an estimated nine Class 1 spaces and

one Class 2 space. Loading would remain as proposed under the proposed project. Access to the two-level below-grade parking garage would be provided as with the proposed project, with an entrance from Brady Street to the garage under Building A, and an entrance from Stevenson Street to garage under Building C.

Figure VI-1, Comparison of Alternatives' Treatment of Lesser Brothers Building, p. VI-9, presents a side-by-side comparison of massing diagrams of the proposed project and each of the alternatives' treatment of this historical resource. **Figure VI-5, Alternative C: Partial Preservation Alternative Floor Plans (Building A)**, p. VI-17; **Figure VI-6, Alternative C: Partial Preservation Alternative Elevations (Building A)**, p. VI-18; and **Figure VI-7, Alternative C: Partial Preservation Alternative Rendering from Market Street**, p. VI-19, present illustrations of this alternative.

Ability to Meet Project Objectives

The Partial Preservation Alternative would meet most of the project sponsor's basic objectives, although in some cases to a lesser degree than would the proposed project, including: develop a mixed-use project on an underutilized but transit-oriented infill site; create a mixed-use, mixed-income community that includes on-site market-rate, inclusionary below-market-rate, and supportive housing, along with neighborhood-serving retail and new labor union facilities; develop at an intensity and density that takes advantage of the transit resources in the area and allows the proposed project to remain financially feasible while delivering on-site public benefits; produce high-quality architectural and landscape design; build a transit-oriented, sustainable development; preserve the character-defining features of the Civic Center Hotel and retain and renovate portions of the Lesser Brothers Building; provide affordable housing on the Colton Street portion of the project site at sufficient density to support on-site social and health services; develop a new facility for the UA Local 38, including offices and union assembly space; fulfill key Market & Octavia Area Plan objectives regarding the network of neighborhood-serving open space and pedestrian passageways; and encourage pedestrian access to the on-site open space by creating mid-block alleyways and other streetscape improvements (Objectives 1 through 10). However, by reducing the size of the residential component of Building A by 35 units, this alternative would provide six percent fewer residential units than would the proposed project, with a corresponding reduction in affordable housing units.

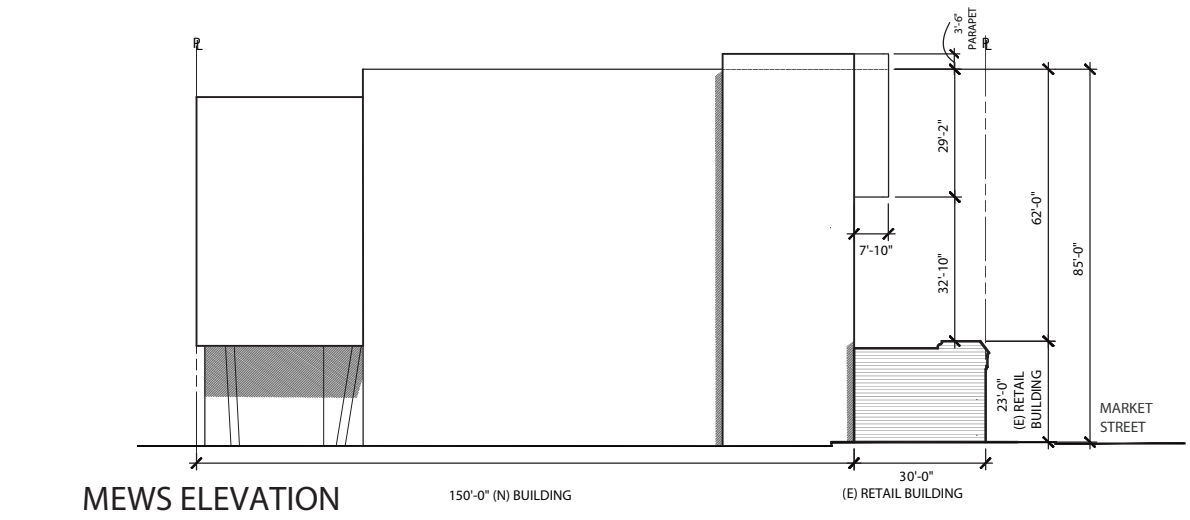
As with the Full Preservation Alternative, the reduction in the number of residential units under the Partial Preservation Alternative would not fully meet the project sponsor's objective of developing the site at an intensity and density that takes advantage of area transit resources. This alternative would detract from the project sponsor's objective of providing on-site affordable housing. The modified design of the proposed project under the Partial Preservation Alternative would partially meet the project sponsor's objective of producing high-quality architectural and landscape design that contributes to Market Street's vibrancy through strong urban design and prominent corners at 12th and Brady Streets, although to a lesser degree than would the proposed project because the new Building A would be constructed 30 feet back from the Market and Brady Street corner. Therefore, this alternative would meet most of the project sponsor's basic objectives, although in some instances to a lesser degree than would the proposed project.

SOURCE: Kennerly Architecture & Planning

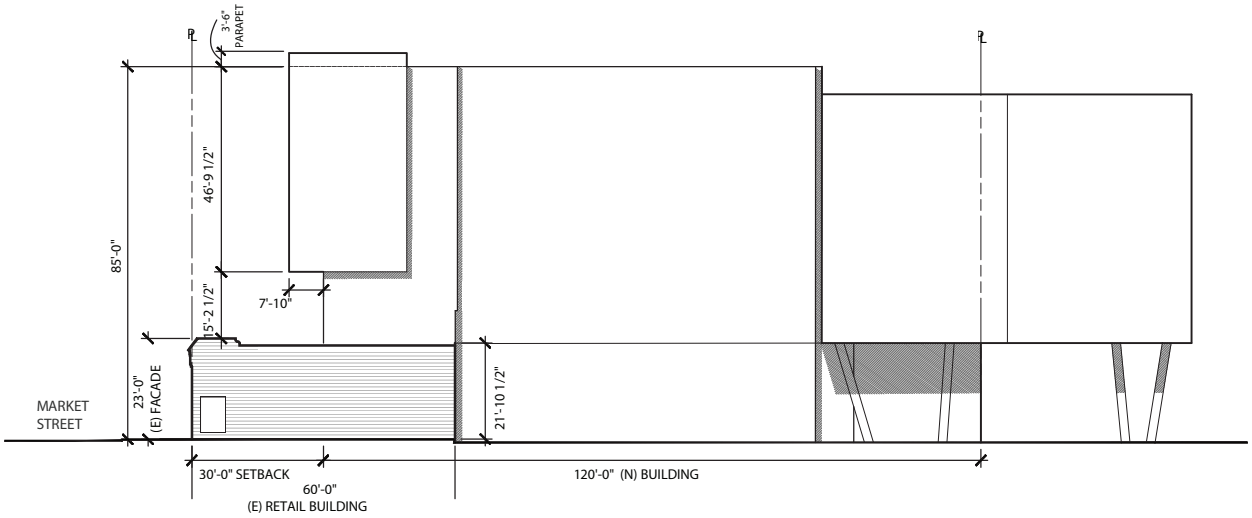
1629 Market Street: Case No. 2015-005848ENV

Figure VI-5

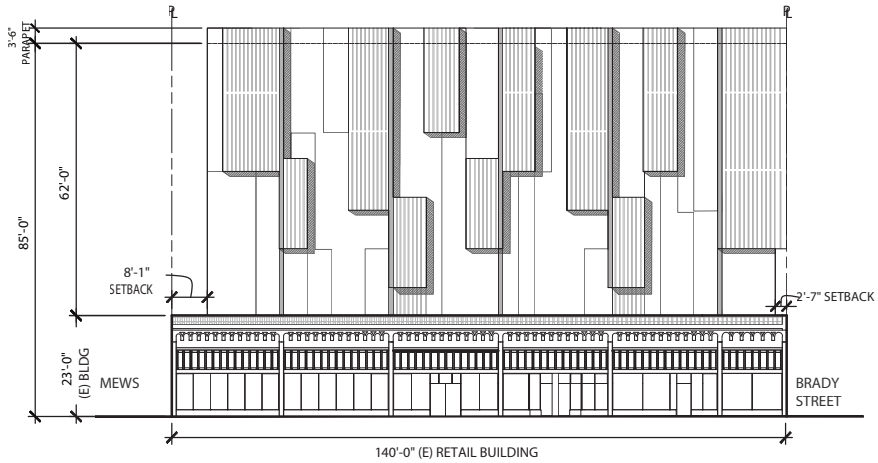
Alternative C: Partial Preservation Alternative Floor Plans (Building A)



MEWS ELEVATION



BRADY STREET ELEVATION

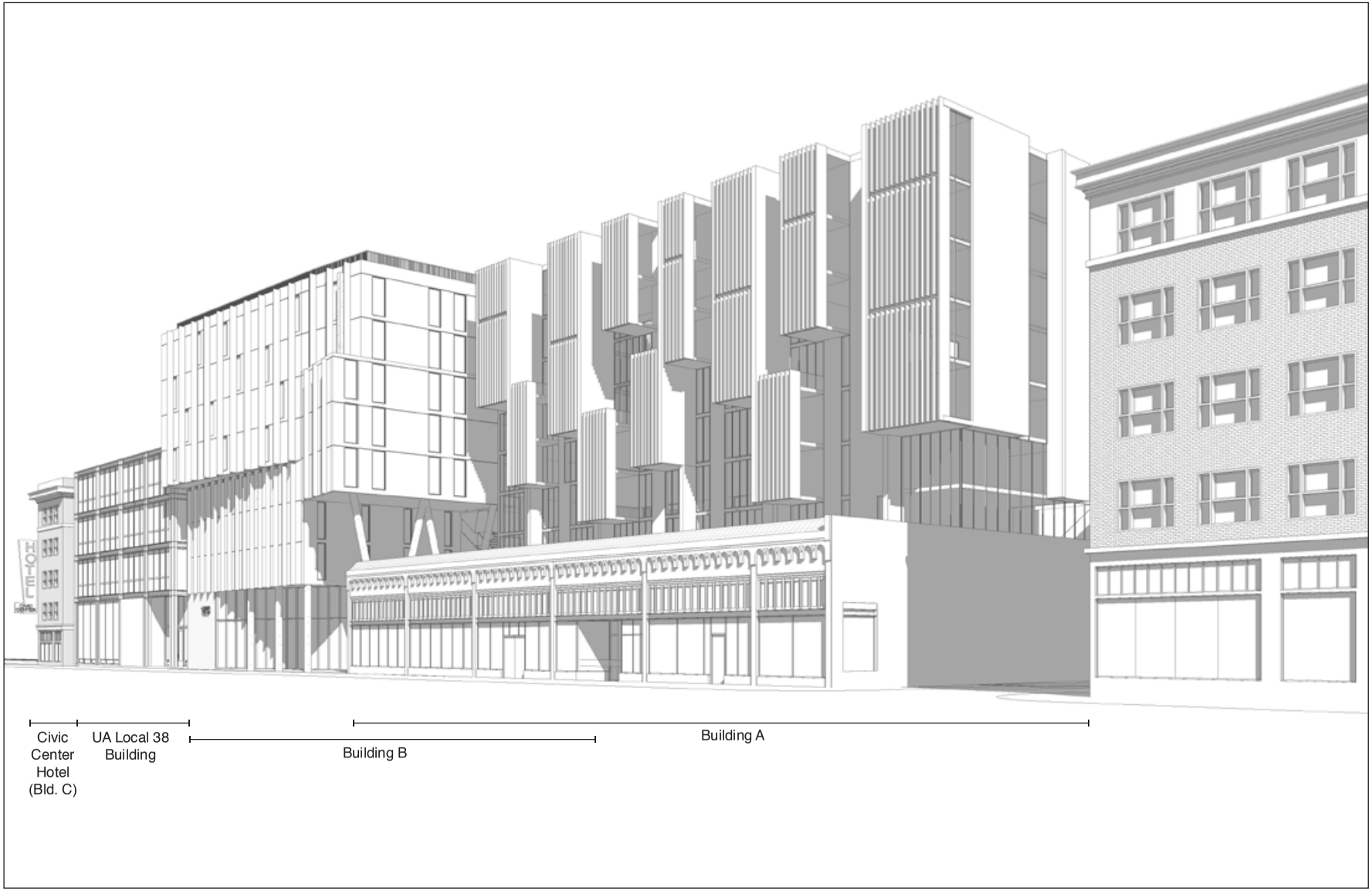


MARKET STREET ELEVATION

1500 Mission Street; Case No. 2014-000362ENV

SOURCE: Kennerly Architecture & Planning

Figure VI-6
Alternative C: Partial Preservation
Alternative Elevations (Building A)



1629 Market Street: Case No. 2015-005848ENV

SOURCE: Kennerly Architecture & Planning

Figure VI-7

Alternative C: Partial Preservation Alternative Rendering from Market Street

Impacts

Historical Architectural Resources

Like the proposed project and the Full Preservation Alternative, the Partial Preservation Alternative would maintain the character-defining features of the Lesser Brothers Building's Market Street façade. This alternative would retain more of the Lesser Brothers Building, a historical resource, than would the proposed project. However, by constructing a nearly 62-foot-tall vertical addition atop the Lesser Brothers Building, albeit an addition set back 30 feet from the Market Street façade, and by demolishing a substantial portion of the Lesser Brothers Building, the Partial Preservation Alternative would significantly alter the historic resource, and thus would materially impair the historical significance of Lesser Brothers Building. Therefore, while the impact would be somewhat lessened as compared to the proposed project with the increased setback, the Partial Preservation Alternative would still result in a significant and unavoidable design-related impact on the Lesser Brothers Building, as with the proposed project. **Mitigation Measures M-CR-1a, HABS Documentation**, and **M-CR-1b, Interpretive Display**, would apply to the Partial Preservation Alternative and would somewhat reduce the impact, but not to a less-than-significant level. Like the proposed project and the Full Preservation Alternative, the Partial Preservation Alternative could result in construction-related vibration impacts on both on-site and adjacent historical resources, including the Civic Center Hotel, the portion of the Lesser Brothers Building to be retained, and adjacent historical resources at 42 12th Street and 56–70 12th Street. Also as with the proposed project and the Full Preservation Alternative, these impacts would be reduced to a less-than-significant level through implementation of **Mitigation Measures M-CR-1c, Protect On-Site Historical Resources from Construction Activities**; **M-CR-1d, Construction Monitoring Program for On-Site Historical Resources**; **M-CR-4a, Protect Adjacent Historical Resources from Construction Activities**; and **M-CR-4b, Construction Monitoring Program for Adjacent Historical Resources**, all of which would apply to the Partial Preservation Alternative. As with the proposed project, impacts on other historical resources, including the Civic Center Hotel and the Path of Gold Light Standards, would be less than significant.

Transportation and Circulation: Cumulative Construction Impacts

As with the proposed project, the Partial Preservation Alternative, in combination with past, present and reasonably foreseeable development in the project vicinity, would result in a significant cumulative construction-related transportation impact on transit, pedestrian, and bicycle circulation, and would contribute considerably to this cumulative construction-related transportation impact, in a similar manner to the proposed project and the Full Preservation Alternative. As with the proposed project and the Full Preservation Alternative, implementation of **Mitigation Measures M-C-TR-8a, Non-Peak Construction Traffic Hours**; **M-C-TR-8b, Construction Management Plan**; and **M-C-TR-8c, Construction Coordination**, would reduce the severity of the cumulative construction-related transportation impact. However, this impact, described further in Impact C-TR-8, would remain significant and unavoidable with mitigation. Because of its incrementally reduced development program compared to the proposed project, the Partial Preservation Alternative would result in two to five percent fewer vehicle, transit, and pedestrian and bike trips as compared to the proposed project. These changes would result in slightly smaller operational effects than those described in Section IV.B, *Transportation and Circulation*. Therefore, as with the proposed project, impacts on vehicle miles traveled, traffic hazards, pedestrian or bicycle travel, loading, and emergency vehicle access would be less than significant, both individually and cumulatively.

Issues Analyzed in the Initial Study

Issues related to the intensity of development as identified in the Initial Study, including population and housing, operational noise and air quality, greenhouse gases, recreation, utilities and service systems, public services, and energy resources, would be incrementally reduced with this alternative, compared to those under the proposed project, given the overall decrease in the development program. As with the proposed project, these impacts would be less than significant.

Issues related to the massing of the development—notably wind and shadow—would result in similar or lesser effects compared to those of the proposed project. In particular, the 30-foot setback of the new residential Building A from Market Street could result in incrementally smaller wind impacts along the project's Market Street frontage because this alternative would not develop an 85-foot-tall structure within 10 feet of the corner of Market and Brady Streets. Wind impacts elsewhere would be similar to those of the proposed project. Shadow impacts would be similar to those of the proposed project, except immediately north of and adjacent to the Lesser Brothers Building, where shadow impacts would be incrementally smaller due to the decreased massing under Alternative C. Wind and shadow impacts would be less than significant, as with the proposed project.

Other issues related to the footprint and location of development including land use and land use planning, hazards and hazardous materials, mineral resources, and agricultural/forest resources would be similar to or the same as the impacts of the proposed project given that comparably sized structures would be developed at the same location as under the proposed project. These impacts would be less than significant, as with the proposed project.

Construction-related activity associated with development of the project site would result in comparable impacts to those of the proposed project related to subsurface archeological resources, noise, air quality, geology and soils, and hydrology and water quality, as excavation and construction would be similar, though incrementally lesser in scale. **Mitigation Measures M-CR-6, Archeological Testing**; **M-CR-7, Inadvertent Discovery of Human Remains**; and **M-CR-8, Tribal Cultural Resources Interpretive Program**, would reduce impacts on archeological resources to a less-than-significant level, as with the proposed project. Similarly, construction-related noise impacts would be reduced to a less-than-significant level with implementation of **Mitigation Measures M-NO-1, Acoustical Assessment of Mechanical, Electrical, and Plumbing (MEP) Equipment**, and **M-NO-2, Construction Noise Reduction**, as with the proposed project. Construction-related impacts to air quality would be significant but reduced to a less-than-significant level with implementation of **Mitigation Measure M-AQ-3, Construction Air Quality**. Excavation activity and foundation construction at the project site could result in impacts to the integrity of BART's underground tunnels and to paleontological resources, but these impacts would be reduced to a less-than-significant level, as with the proposed project, through implementation of **Mitigation Measures M-GE-3a, Design Approval and Construction Monitoring for BART Subway Structure**; **M-GE-3b, Monitoring of Adjacent Structures in the Event of Dewatering;** and **M-GE-6, Inadvertent Discovery of Paleontological Resources**. Each of the foregoing mitigation measures would be applicable to the Partial Preservation Alternative.

VI.D Environmentally Superior Alternative

The CEQA Guidelines require the identification of an environmentally superior alternative (Section 15126.6(e)). The environmentally superior alternative is the alternative that best avoids or lessens any significant impacts of the proposed project, even if the alternative would impede to some degree the attainment of the project objectives. A comparison of the development program and impacts identified for the proposed project and the project alternatives is provided below in **Table VI-2, Comparison of the Significant Environmental Impacts of Project to Impacts of Alternatives**. If it is determined that the "no project" alternative would be the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other project alternatives (Section 15126.6(3)).

The proposed project would result in a significant and unavoidable impact related to historic architectural resources, in that the proposed project would demolish most of the historic Lesser Brothers Building, thereby resulting in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5(b). No other project-specific significant and unavoidable impacts would occur as a result of the proposed project. However, the proposed project would make a considerable contribution to the significant and unavoidable cumulative construction-related transportation impact that may result from potentially overlapping construction schedules of the proposed project and a number of other nearby projects, all located in close proximity to one another as well as to a prominent City intersection (Market Street and Van Ness Avenue). However, this cumulative impact is largely a function of the many other projects proposed and recently approved in the immediate project vicinity, and would occur regardless of whether the proposed project were to proceed. Moreover, this cumulative impact would be reduced in severity to the maximum feasible extent through implementation of **Mitigation Measures M-C-TR-8a, Non-Peak Construction Traffic Hours**; **M-C-TR-8b, Construction Management Plan**; and **M-C-TR-8c, Cumulative Construction Coordination**. Additionally, other mitigation measures, such as imposing sequential (i.e., non-overlapping) construction schedules for all projects in the vicinity, were considered but deemed infeasible due to potentially lengthy delays in project implementation. The No Project Alternative would be the environmentally superior alternative because the significant impacts associated with implementation of the proposed project would not occur. The No Project Alternative, which would involve no new development on the project site, would also eliminate the project's less-than-significant impacts, and no mitigation measures would be required.

Because CEQA requires selection of an environmentally superior alternative other than the No Project Alternative, the Full Preservation Alternative is identified as the environmentally superior alternative because it would meet most of the project sponsor's basic objectives, albeit to a lesser degree in some instances, while avoiding the proposed project's significant and unavoidable historical architectural resources impact on the Lesser Brothers Building. While the Full Preservation Alternative would not avoid the proposed project's considerable contribution to the significant and unavoidable cumulative construction-related transportation impact (Impact C-TR-8), and would incrementally increase vehicle trips and resultant emissions and noise from vehicle traffic, it would not result in any new significant impacts or substantially more severe impacts as compared to the proposed project. Inasmuch as the Full Preservation Alternative would avoid the proposed project's only project-specific significant and unavoidable impact, and because the cumulative construction-related transportation impact cannot feasibly be avoided due to the infeasibility of the City scheduling development projects consecutively rather than concurrently, the Full Preservation Alternative is considered the environmentally superior alternative.

TABLE VI-2 COMPARISON OF THE SIGNIFICANT ENVIRONMENTAL IMPACTS OF PROJECT TO IMPACTS OF ALTERNATIVES

Impacts	Proposed Project	Alternative A: No Project Alternative	Alternative B: Full Preservation Alternative	Alternative C: Partial Preservation Alternative
Description	The proposed project would demolish the existing UA Local 38 building, demolish the majority of the Lesser Brothers Building, rehabilitate the Civic Center Hotel, and demolish the 242-space surface parking lots on the project site. The proposed development would construct a total of five new buildings on the project site. Overall, the proposed project would include construction of 498,100 square feet of residential use that would contain a total of up to 584 dwelling units consisting of 477 residential units and up to 107 affordable units in the Colton Street Affordable Housing building. In addition, the proposed project would include 27,300 square feet of union facility use, 13,000 square feet of ground-floor retail/restaurant use, and 32,800 square feet of publicly-accessible and residential common open space.	The site would remain in its existing condition. The buildings and parking lots on the project site would not be altered, and the proposed new residential and retail/restaurant uses would not be developed.	This alternative would develop the project site in the same manner as the proposed project, but would retain the entirety of the Lesser Brothers Building, add a partial, approximately nine-foot-tall single-story addition atop this building, and construct a smaller new residential building (Building A) behind (south of) the historic Lesser Brothers Building, approximately 60 feet south of Market Street. This alternative would provide 520 dwelling units, including up to 107 dwelling units in the Colton Street Affordable Housing building. This alternative would include 27,300 square feet of union facility use, 20,300 square feet of retail/restaurant space, between 296 and 301 parking spaces, 215 Class 1 and 39 Class 2 bicycle parking spaces, and 32,800 square feet of publicly-accessible and residential common open space.	This alternative would develop the project site in the same manner as the proposed project, but would construct a smaller new residential building (Building A) set back 30 feet from the Market Street façade of the Lesser Brothers Building, and retain approximately 55 percent of the volume of the Lesser Brothers Building, including the Market Street façade. This alternative would provide 549 dwelling units, including up to 107 dwelling units in the Colton Street Affordable Housing building. This alternative would include 27,300 square feet of union facility use, 14,400 square feet of retail/restaurant space, between 296 and 301 parking spaces, 222 Class 1 and 41 Class 2 bicycle parking spaces, and 32,800 square feet of publicly-accessible and residential common open space.
Ability to Meet Project Sponsor's Objectives	All	None	Most	Most
Cultural Resources				
Effects on Lesser Brothers Building	**Impact CR-1:** The proposed project would cause a substantial adverse change in the significance of the Lesser Brothers Building, a historical resource as defined in CEQA Guidelines Section 15064.5(b). (SUM)	No impact (NI)	Less substantial than the proposed project (LTS)	Somewhat less substantial than the proposed project (SUM)
Effects on Civic Center Hotel	**Impact CR-2:** The proposed project could cause a substantial adverse change in the significance of the Civic Center Hotel, a historical resource as defined in CEQA Guidelines Section 15064.5(b). (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)

TABLE VI-2 COMPARISON OF THE SIGNIFICANT ENVIRONMENTAL IMPACTS OF PROJECT TO IMPACTS OF ALTERNATIVES

Impacts	Proposed Project	Alternative A: No Project Alternative	Alternative B: Full Preservation Alternative	Alternative C: Partial Preservation Alternative
Effects on Adjacent Resources	**Impact CR-4:** Construction-related activities associated with the proposed project could cause a substantial adverse change in the significance of adjacent historical resources as defined in CEQA Guidelines Section 15064.5(b). (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)
Effects on Archeological Resources	**Impact CR-6:** The proposed project could cause a substantial adverse change in the significance of an archeological resource. (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)
Effects on Human Remains	**Impact CR-7:** The proposed project could disturb human remains, including those interred outside of dedicated cemeteries. (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)
Effects on Tribal Cultural Resources	**Impact CR-8:** The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074. (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)
Cumulative Cultural Resources Effects	**Impact C-CR-2:** The proposed project in combination with past, present, and reasonably foreseeable future projects in the vicinity could result in cumulative impacts to archeological resources, tribal cultural resources, and human remains. (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)
Transportation and Circulation				
Cumulative Construction Impacts	**Impact C-TR-8:** The proposed project, in combination with other past, present, and reasonably foreseeable future projects, would contribute considerably to significant cumulative construction-related transportation impacts. (SUM)	No impact (NI)	Similar to the proposed project (SUM)	Similar to the proposed project (SUM)

TABLE VI-2 COMPARISON OF THE SIGNIFICANT ENVIRONMENTAL IMPACTS OF PROJECT TO IMPACTS OF ALTERNATIVES

Impacts	Proposed Project	Alternative A: No Project Alternative	Alternative B: Full Preservation Alternative	Alternative C: Partial Preservation Alternative
Noise				
Operational Noise Effects	**Impact NO-1:** The proposed project could result in the exposure of persons to or generation of noise levels in excess of established standards, and could result in a substantial permanent increase in ambient noise levels or otherwise be substantially affected by existing noise. (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)
Construction Noise Effects	**Impact NO-2:** During construction, the proposed project could result in a substantial temporary or periodic increase in ambient noise levels and vibration in the project vicinity above levels existing without the proposed project. (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)
Cumulative Noise Effects	**Impact C-NO-1:** The proposed project would make a considerable contribution to cumulative significant noise impacts. (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)
Air Quality				
Exposure to Toxic Air Contaminants	**Impact AQ-3:** The proposed project would generate toxic air contaminants, including diesel particulate matter, exposing sensitive receptors to substantial air pollutant concentrations. (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)
Cumulative Air Quality Effects	**Impact C-AQ-1:** The proposed project, in combination with past, present, and reasonably foreseeable future development in the project area would contribute to cumulative air quality impacts. (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)

TABLE VI-2 COMPARISON OF THE SIGNIFICANT ENVIRONMENTAL IMPACTS OF PROJECT TO IMPACTS OF ALTERNATIVES

Impacts	Proposed Project	Alternative A: No Project Alternative	Alternative B: Full Preservation Alternative	Alternative C: Partial Preservation Alternative
Geology and Soils				
Effects on BART Tunnels	**Impact GE-3:** The proposed project would be located on a 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. (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)
Effects on Paleontological Resources	**Impact GE-6:** The proposed project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (LSM)	No impact (NI)	Similar to the proposed project (LSM)	Similar to the proposed project (LSM)

IMPACT CODES:
NI = No impact
LTS = Less than significant or negligible impact; no mitigation required
LSM = Less than significant impact with implementation of mitigation measure(s)
SU = Significant and unavoidable adverse impact, no feasible mitigation
SUM = Significant and unavoidable adverse impact, after mitigation

CHAPTER VII

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Appendices

A. Initial Study (IS)
B. Notice of Preparation (NOP) for Case No. 2015-005848ENV
C. Public Utilities Commission Resolution and Water Supply Assessment

ESA

Appendix A
Initial Study (IS)

ESA

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1629 MARKET STREET MIXED-USE PROJECT

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Initial Study

1629 Market Street Project

Planning Department Case No. 2015-005848ENV

A. Project Description

[Note: A full project description is not provided with this Initial Study because a detailed project description is located in Chapter II, *Project Description*, of the EIR to which this Initial Study is attached.]

The project site occupies approximately 97,617 square feet, or 2.2 acres, on the block bounded by Market, 12th, Otis, and Brady Streets located within the boundaries of San Francisco's Market & Octavia Area Plan, an area plan of the *San Francisco General Plan* (*General Plan*). Most of the site is located within the NCT-3 (Moderate-Scale Neighborhood Commercial Transit) Zoning District, while the southwestern portion of the site, occupying approximately 20,119 square feet is in a P (Public) Zoning District. The portions of the project site north of Stevenson Street and east of Colusa Place are located within an 85-X height and bulk district, while the portion of the project site south of Colton Street is in a 40-X height and bulk district.[1] The project site is currently occupied by four surface parking lots containing 242 parking spaces, an approximately 15-foot-tall Bay Area Rapid Transit (BART) ventilation structure for the below-grade BART tunnel, as well as three buildings: the Civic Center Hotel, the United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry (UA) Local 38 building, and the Lesser Brothers Building.

The proposed project would demolish the existing UA Local 38 building, located at 1621 Market Street, demolish the majority of the Lesser Brothers Building, located at 1629–1637 Market Street, rehabilitate the Civic Center Hotel, located at 1601 Market Street, and demolish the 242-space surface parking lots on the project site. The proposed development would construct a total of five new buildings on the project site, including a new four-story, 58-foot-tall, 27,300-square-foot UA Local 38 building adjacent to the Civic Center Hotel, as well as a 10-story, 85-foot-tall, 187,100-square-foot addition to the Lesser Brothers Building at the corner of Brady and Market Streets containing 198 residential units and 6,600 square feet of ground-floor retail/restaurant space ("Building A"). A 10-story, 85-foot-tall, 118,300-square-foot building containing 136 residential units and 2,500 square feet of ground-floor retail/restaurant space ("Building B") would be constructed on Market Street between the new UA Local 38 building and Building A. A nine-story, 85-foot-tall, 74,700-square-foot building containing 78 residential units would be constructed south of Stevenson Street and north of Colton Street ("Building D"). The five-story, 55-foot-tall Civic Center Hotel would be rehabilitated to contain 65 residential units and 4,000 square feet of ground-floor retail/restaurant space (also referred to as "Building C"), and a new six-story, 68-foot-tall, 50,900-square-foot Colton Street Affordable Housing building containing up to 107 affordable units would be constructed south of Colton Street as part of the proposed project. The proposed project would construct the new 18,300-square-foot Brady Open Space at the northeast corner of Brady and Colton Streets. In addition, the proposed project would include construction of a two-level, below-grade garage with up to 316 parking spaces (some of which may include the use of stackers) accessible from Brady and Stevenson Streets. Overall, the proposed project would include construction of 498,100 square feet of residential use that would contain up to 477 residential units and up to 107 affordable units in the Colton Street Affordable

[1] Following San Francisco convention, Market Street and streets parallel to it are considered to run east/west, while 12th Street and streets parallel to it are considered to run north/south.

Housing building.[2] In addition, the proposed project would include 27,300 square feet of union facility use, 13,000 square feet of ground-floor retail/restaurant use, and 32,800 square feet of publicly-accessible as well as residential common open space.

The proposed project would provide on-street loading zones and on-site loading spaces. Three loading zones would be provided on streets adjacent to the project site for the proposed project. A 100-foot commercial and passenger loading zone would be provided on the west side of 12th Street, a 60-foot commercial/passenger loading zone would be provided on the east side of Brady Street north of Stevenson Street, and 40-foot commercial and passenger loading zone would also be provided on the west side of Brady Street north of Colton Street. In addition, four 20-foot-long off-street loading spaces would be provided in the below-grade parking garage under Buildings A and B. A designated 25-foot-long on-site move-in/move-out loading space would also be provided on the project site adjacent to Building D.

The proposed project would entail excavation to a maximum depth of approximately 30 feet to accommodate the two below-grade parking levels and foundation. Phase 1 excavation would total up to approximately 39,700 cubic yards, and Phase 2 would total up to approximately 23,700 cubic yards. The proposed project is anticipated to be constructed on a mat foundation. As discussed under Topic E.13, *Geology and Soils*, in the Initial Study (Appendix A), impact pile driving is not anticipated as part of the proposed project.[3]

The proposed project would be constructed in two sequential phases. Phase 1 would include construction of the Colton Street Affordable Housing building, the new UA Local 38 building, and the building located south of Stevenson Street and north of Colton Street ("Building D"), all of which would be located on existing surface parking lots. In addition, the building on the corner of Market and Brady Streets ("Building A"), including the two-level, below-grade parking garage would also be constructed during Phase 1. The two-level, below-grade parking garage under the adjacent building would be completed in Phase 2. Construction of the building on the corner of Market and Brady Streets would entail demolition of the majority of the Lesser Brothers Building and construction of a 10-story addition behind the portion of the façade along Market Street proposed to be retained. Residents of the Civic Center Hotel would remain onsite during Phase 1 construction, as would employees of the UA Local 38 building. Following the completion of Phase 1 construction, the new buildings would be available for occupancy and current long-term residents of the Civic Center Hotel would have the opportunity to move and relocate into the new Colton Street Affordable Housing building. Phase 2 construction would entail demolition of the existing UA Local 38 building and construction of the building adjacent to the building on the corner of Market and Brady Streets ("Building B") and its below-grade parking garage, and the rehabilitation of the Civic Center Hotel into a mixed-use building with residential use over ground-floor retail/restaurant.

The construction duration for the entire proposed project is estimated to require a total of 44 months. Phase 1 would require 22 months and is anticipated to begin in March 2018, with initial occupancy anticipated to occur by January 2020. Phase 1 would involve demolition and site preparation (including grading and excavation) that would take approximately five months, followed by foundation and below-grade construction requiring

[2] The proposed project would meet the requirements of the City's Residential Inclusionary Affordable Housing Program (*Planning Code* Sections 415 et seq.) by providing market-rate and affordable units within the 477 residential units, as well as up to 107 affordable units in the Colton Street Affordable Housing Building, as set forth in the Development Agreement.

[3] Langan Treadwell Rollo, *Preliminary Geotechnical Investigation, 1629 Market Street*, July 5, 2016. This document (and all other documents cited in this EIR, unless otherwise noted), is available for review at 1650 Mission Street, Suite 400, San Francisco, CA, as part of Case No. 2015-005848ENV.

two months, then building construction, paving, and architectural coatings would require an additional 11 months, with completion of interiors taking an additional four months.

Phase 2 of the proposed project is anticipated to begin in January 2020 and require 22 months for completion, anticipated by November 2021. Phase 2 would involve demolition and site preparation (including grading and excavation) and would take approximately five months, followed by foundation and below-grade construction requiring two months, then building construction, paving, and architectural coatings would require an additional 11 months, with completion of interiors completion taking an additional four months.

The project sponsor would seek amendments to the Zoning Map Height and Bulk Districts and *San Francisco Planning Code* (*Planning Code*) text amendments to create a new special use district and amendments to the Market & Octavia Area Plan land use and height maps and open space policy language, all of which would require a recommendation by the Planning Commission and approval by the Board of Supervisors. In addition, the project sponsor is seeking approval of a Conditional Use/Planned Unit Development for lot and use size and to allow certain *Planning Code* exceptions. The project sponsor would also seek approval of a Development Agreement with respect to the project sponsor's commitment to develop affordable housing as part of the proposed project and to develop and maintain the Brady Open Space.

Figures II-1 through II-17 in EIR Chapter II, *Project Description*, depict the project site location, the existing and proposed site plans, the proposed floor plans and elevations, and the proposed project renderings. Table II-1, Proposed Project Characteristics, in EIR Chapter II presents a tabulation of project characteristics.

B. Project Setting

The approximately 97,617-square-foot (2.2-acre) project site (Assessor's Block 3505, Lots 001, 007, 008, 027, 028, 029, 031, 031A, 032, 032A, 033, 033A, 034, and 035) is located approximately 250 feet west of the intersection of Market Street and South Van Ness Avenue. The project site is on the block bounded by Market Street to the north, 12th Street to the east, Chase Court to the south, and Brady Street to the west. The project site is also located within the Market & Octavia Plan area of the *General Plan*. The project neighborhood is a densely built area that contains a variety of uses including residential and mixed-use buildings, as well as hotels, restaurants, cafes, religious and community facilities such as schools and fitness facilities, health care facilities, commercial and office buildings, automobile dealerships, and a few public parks and small open spaces.

The project site is primarily located within a NCT-3 (Moderate-Scale Neighborhood Commercial Transit District) Zoning District, while the southwestern portion of the site occupying approximately 20,119 square feet is in a P (Public) Zoning District. The P Zoning District is designated in the Market & Octavia Plan as the location for a planned open space. The following height and bulk districts are located adjacent to the project site: 40-X to the north and south; 50-X to the north and west; 85-X to the north, south, east, and west; 85/250-R-2 to the east; 120-R-2 to the east; and 120/400-R-2 to the east. The project site and surrounding area is generally flat.

Land uses immediately surrounding the project site consist primarily of low- to mid-rise, masonry-clad commercial buildings, including automobile-oriented businesses and urgent care medical services, ranging in height from 25 to 45 feet in height. In addition, older, masonry-clad, mid-rise residential buildings and newer, fiber cement-clad buildings ranging from 45 to 85 feet in height, with neighborhood-serving retail uses are located on the ground floor along Market Street. Several community facilities, including the San Francisco Conservatory of Music, the International High School and the Chinese American International School, and the

San Francisco Law School are located north of the project site near Market Street, and the City College of San Francisco has an auditorium and administrative offices along Gough Street, west of the project site. The project site is immediately surrounded by a mix of two- to nine-story commercial, residential, community facility, and light industrial buildings. Vegetation in the area is generally limited to street trees. Nearby public parks and open spaces within approximately 0.50 mile of the project site include Patricia's Green, Page & Laguna Mini Park, Koshland Park, Hayes Valley Playground, and Civic Center Plaza.

C. Compatibility with Existing Zoning and Plans

	Applicable	*Not Applicable*
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.	☒	☐

See Chapter III, *Plans and Policies*, in this Draft Environmental Impact Report (DEIR) for a detailed discussion of land use plans applicable to the 1629 Market Street Mixed-Use Project and identification of the proposed project's potential to conflict with those plans or policies.

D. Summary of Environmental Effects

The proposed project could potentially affect the environmental factor(s) checked below, for which mitigation measures would be required to reduce potentially significant impacts to less than significant. The following pages present a more detailed checklist and discussion of each environmental factor.

☐	Land Use	☐	Greenhouse Gas Emissions	☒	Geology and Soils
☐	Population and Housing	☐	Wind and Shadow	☐	Hydrology and Water Quality
☒	Cultural Resources	☐	Recreation	☐	Hazards/Hazardous Materials
☒	Transportation and Circulation	☐	Utilities and Service Systems	☐	Mineral/Energy Resources
☒	Noise	☐	Public Services	☐	Agricultural/Forest Resources
☒	Air Quality	☐	Biological Resources	☒	Mandatory Findings of Significance

This Initial Study evaluates the proposed 1629 Market Street Mixed-Use Project to determine whether it would result in significant environmental impacts. The designation of topics as "Potentially Significant" in the Initial Study means that the EIR will consider the topic in greater depth and determine whether the impact would be significant. On the basis of this Initial Study, topics for which there are project-specific effects that have been determined to be potentially significant are:

- Cultural Resources (historical architectural resources only); and
- Transportation and Circulation (all topics).

The Cultural Resources (historic architectural resources only) and the Transportation and Circulation topics are evaluated in the DEIR prepared for the proposed project. The project has the potential to result in a significant, cumulative transportation-related construction impact; therefore, for ease of reference all Transportation and Circulation topics will be included together in the DEIR.

EFFECTS FOUND NOT TO BE SIGNIFICANT

The following potential individual and cumulative environmental effects were determined to be either less than significant or would be reduced to a less-than-significant level through recommended mitigation measures included in this Initial Study:

- Land Use and Land Use Planning (all topics);
- Population and Housing (all topics);
- Cultural Resources (archeological resources, human remains, and tribal cultural resources);
- Noise (all topics);
- Air Quality (all topics);
- Greenhouse Gas Emissions (all topics);
- Wind and Shadow (all topics);
- Recreation (all topics);
- Utilities and Service Systems (all topics);
- Public Services (all topics);
- Biological Resources (all topics);
- Geology and Soils (all topics);
- Hydrology and Water Quality (all topics);
- Hazards and Hazardous Materials (all topics);
- Mineral and Energy Resources (all topics); and
- Agricultural and Forest Resources (all topics).

These items are discussed with mitigation measures, where appropriate, in Section E, *Evaluation of Environmental Effects*, of this Initial Study, and require no environmental analysis in the DEIR. All mitigation measures identified, including those for archeological resources, construction noise, air quality, geologic resources, and hazardous materials are listed in Section F, *Mitigation Measures and Improvement Measures*; have been agreed to by the project sponsor; and will be incorporated into the proposed project. For items designated "Not Applicable" or "No Impact," the conclusions regarding potential significant environmental effects are based upon field observations, staff and consultant experience and expertise on similar projects, and/or standard reference materials available within the San Francisco Planning Department, such as the California Natural Diversity Database and maps published by the California Department of Fish and Wildlife, the California Division of Mines and Geology Mineral Resource Zone designations, and the California Department of Conservation's Farmland Mapping and Monitoring Program. For each checklist item, the evaluation has considered both individual and cumulative impacts of the proposed project.

SENATE BILL 743 AND CEQA SECTION 21099

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014.[4] Among other provisions, SB 743 amends CEQA by adding Section 21099 regarding analysis of aesthetics and parking impacts for urban infill projects.[5]

[4] California Legislative Information, "Senate Bill No. 743," 2013. Available at http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB743, accessed August 17, 2016.

[5] See CEQA Section 21099(d).

Aesthetics and Parking Analysis

CEQA Section 21099(d) states that, "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment."[6] Accordingly, aesthetics and parking are no longer to be considered in determining if a project has the potential to result in significant environmental effects for projects that meet all of the following three criteria:

- The project is in a transit priority area;[7]
- The project is on an infill site;[8] and
- The project is residential, mixed-use residential, or an employment center.[9]

The proposed project meets each of the above three criteria because it is (1) located within 0.5 mile of several rail and bus transit routes; (2) located on an infill site that is already developed with a five-story Civic Center Hotel, temporarily used as a Navigation Center,[10] a two-story office structure currently occupied by UA Local 38 with at-grade parking, and a single-story retail structure with additional at-grade parking; and (3) would be a residential retail/restaurant space, as well as an employment center.[11] Thus, this Initial Study does not consider aesthetics and the adequacy of parking spaces provided in the project in determining the significance of project impacts under CEQA.

The Planning Department recognizes that the public and decision-makers nonetheless may be interested in information pertaining to the aesthetic effects of a proposed project and may desire that such information be provided as part of the environmental review process. Therefore, some information that would have otherwise been provided in an aesthetics section (i.e., visual simulations) has been included in DEIR Chapter II, *Project Description*, to which this Initial Study is attached. However, this information is provided solely for informational purposes and is not used to determine the significance of the environmental impacts of the project pursuant to CEQA.

In addition, CEQA Section 21099(d)(2) states that a Lead Agency maintains the authority to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers and that aesthetics impacts do not include impacts on historical or cultural resources (e.g., historic architectural resources). As such, the Planning Department does consider aesthetics for design review and to evaluate effects on historic and cultural resources.

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[6] See CEQA Section 21099(d)(1).

[7] CEQA Section 21099(a)(7) defines a "transit priority area" as an area within 0.5 mile of an existing or planned major transit stop. A "major transit stop" is defined in CEQA Section 21064.3 as a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

[8] CEQA Section 21099(a)(4) defines an "infill site" as a lot located within an urban area that has been previously developed, or a vacant site where at least 75 percent of the perimeter of the site adjoins, or is *separated* only by an improved public right-of-way from, parcels that are developed with qualified urban uses.

[9] CEQA Section 21099(a)(1) defines an "employment center" as a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and located within a transit priority area.

[10] A Navigation Center is designed to help homeless people find permanent housing by connecting people with social services and long-term housing or, if individuals wish, help them access Homeward Bound, a city program that buys them a bus ticket home.

[11] San Francisco Planning Department, *Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis*, 1629 Market Street (2015-005848ENV), June 7, 2016.

Automobile Delay and Vehicle Miles Traveled Analysis

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* recommending that transportation impacts for projects be measured using a vehicle miles traveled (VMT) metric.[12] 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 impacts on non-automobile modes of travel such as riding transit, walking, and bicycling.)

Accordingly, this Initial Study does not contain a discussion of automobile delay impacts. Instead, a VMT and induced automobile travel impact analysis was prepared and is presented in Section IV.B, *Transportation and Circulation*, of the DEIR. The topic of automobile delay, nonetheless, may be considered by decision-makers, independent of the environmental review process, as part of their decision to approve, modify, or disapprove the proposed project.

Cumulative Setting

Past, present, and reasonably foreseeable cumulative development projects within 0.25 mile of the project site are listed below in **Table 1, Cumulative Projects in a 0.25-Mile Radius of Project Site**, p. 8, and mapped on **Figure 1, Cumulative Projects**, p. 9. These cumulative projects, several of which are associated with the Market Street Hub Project—a proposed transit-oriented, high-density, mixed-use neighborhood around the intersections of Market Street and Van Ness Avenue—are either under construction or the subject of an Environmental Evaluation Application on file with the Planning Department.

[12] California Governor's Office of Planning and Research, 2016, "Updating the Analysis of Transportation Impacts Under CEQA." Available at https://www.opr.ca.gov/s_sb743.php, accessed August 17, 2016.

TABLE 1 CUMULATIVE PROJECTS IN A 0.25-MILE RADIUS OF PROJECT SITE

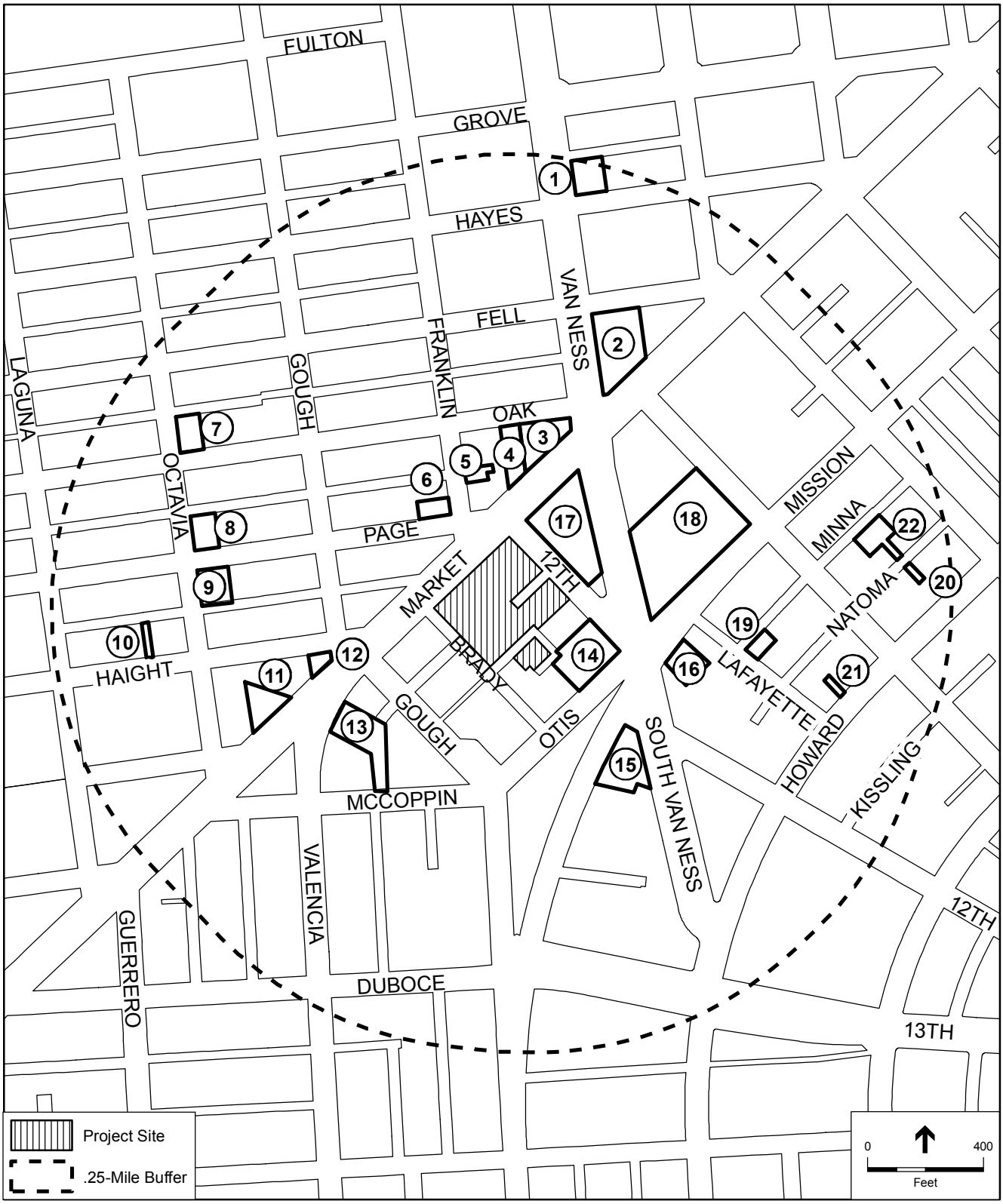
	Name	Case File No.	Dwelling Units (#)	Commercial (sf)	Office (sf)	Child Care	Population (#) [a]
1	200–214 Van Ness Avenue	2015-012994ENV	17				34
2	30 Van Ness Avenue [b]	2015-008571ENV	596	12,000			1,192
3	One Oak Street (formerly 1500–1540 Market Street)	2009.0159E_3	320	12,970			677
4	1546–1564 Market Street	2012.0877E_5	219	4,560			451
5	22 & 24 Franklin Street	2013.1005E	24	1,900			53
6	One Franklin Street	2008.1328E	35	2,400			77
7	300 and 350 Octavia Street (Parcels M & N)	2014-002330ENV	24	1,600			53
8	Octavia Street (Parcels R & S)	2014.1322ENV	TBD	4,925			14
9	188 Octavia Street (Parcel T)	2014.1509ENV	26	5,320			67
10	124 Haight	2015-003952ENV	5				10
11	1740 Market Street	2014.0409ENV	110	7,630			242
12	1700 Market Street	2013.1179E	48	1,549			100
13	1699 Market Street	2014.0484E	160	3,937			331
14	30 Otis Street [c]	2015-010013ENV	354	4,600			721
15	1601 Mission Street (Tower Car Wash)	2014.1121ENV	220	7,336			461
16	1563 Mission Street	2014.0095E			40,600		147
17	10 South Van Ness (Honda Site)	2015-004568ENV	767	20,400			1,592
18	1500–1580 Mission Street (Goodwill site)	2014-000362ENV	560	31,447	449,818	4,377	2,879
19	35 Lafayette Street	2013.0113E	4				8
20	949 Natoma Street	2015-001958ENV	6				12
21	1532 Howard Street	2013.1305E	15				30
22	915 Minna Street	2015-002600ENX	44				88
	Total		***3,554***	***122,574***	***490,418***	***4,377***	***7,108***

SOURCE: San Francisco Planning Department Property Information Database and Active Permits in My Neighborhood Map. Available at http://propertymap.sfplanning.org/, accessed August 23, 2016.

a. The sum population is calculated by adding former columns assuming (1) 2 persons per dwelling unit consistent with Census tract 201 rates, (2) 1 employee per 350 sf of commercial space, (3) 1 employee per 276 sf of office space, and (4) child care employee ratio based one staff member per six children.

b. Although there is no current environmental application for 30 Van Ness Avenue, the development program is based on a conservative assumption of what could be allowed on the site under the current zoning.

c. This project includes approximately 13,125 sf for a ballet school that already exists on the site; therefore, it has not been included in the development program.



SOURCE: San Francisco GIS

1629 Market Street: Case No. 2015-005848ENV

Figure 1
Cumulative Projects

In addition to the cumulative projects identified in **Table 1,** the following area plans and transportation infrastructure projects are also considered part of the cumulative setting:

- **Market & Octavia Area Plan,** Planning Department Case No. 2003.0347: The Market & Octavia Plan is an element of the *General Plan*. The Market & Octavia Plan serves to respond to the need for housing, repair the fabric of the neighborhood, and to support transit-oriented development. The Plan proposes new zoning for appropriate residential and commercial uses, prescribes streetscape and open space improvements, and places high-density land uses close to transit. Additionally, the Plan described infill guidelines for housing on 22 vacant Central Freeway parcels and the creation of a new residential center in South of Market (SoMa) West / South Van Ness area.
- **The Market Street Hub (The Hub) Project,** Case No. 2015-000940ENV: The Hub Project would reexamine and propose changes to the current zoning, land use policies and public realm/street designs for the area referred to as "SoMa West" in the *Market Octavia Area Plan*. The Hub Project would include the following zoning components: zoning changes requiring more permanently affordable housing units; zoning changes to incentivize development of affordable housing for artists, office space for non-profit organizations, and performance or fine arts studio space; height district increases to introduce a variety of building heights and smooth height transitions to adjacent areas; study of minor use changes such as inclusion of office beyond current Market & Octavia Area Plan allowances; bulk control increases; zoning changes to reduce parking maximums; transportation demand management policies; and development impact fees. The Hub Project would also include potential public realm and transportation components. The anticipated date of approval for The Hub Project is 2019.
- **Western SoMa Area Plan,** Planning Department Case No. 2008.0877: The Western SoMa Community Plan is an element of the *General Plan*. The Plan Area comprises approximately 298 acres in the western portion of the SoMa. The various components of the Plan include increases and decreases in building heights on selected parcels due to proposed height and bulk district reclassifications, increases and decreases in density on selected parcels due to proposed use district reclassifications that replace density standards with other mechanisms to account for density, such as building envelope controls; and streetscape improvements along designated streets and intersections, including installation of signalized pedestrian crossings; sidewalk extensions and corner bulbouts; gateway treatments such as signage and lighting; physical roadway features such as enhanced hardscape area, landscaped islands and colored textured pavement; public realm greening amenities (i.e., street trees and planted medians); and other pedestrian enhancements (i.e., street furniture and public restrooms). The Western SoMa Community Plan has been adopted and plan implementation is currently under way.
- **Van Ness Avenue Bus Rapid Transit (BRT) Project:** This project will implement BRT improvements along a two-mile stretch of Van Ness/South Van Ness Avenue from Mission Street to North Point Street, including constructing dedicated bus lanes, replacing the overhead wire system, and building new bus stations. Additional components of the project include pedestrian safety improvements, utility replacement and street repaving, and new landscaping and lighting.
- **Better Market Street Project.** San Francisco Public Works, in coordination with the San Francisco Planning Department and the SFMTA, proposes to redesign and provide various transportation and streetscape improvements to the 2.2-mile segment of Market Street between Octavia Boulevard and The Embarcadero, and potentially to the 2.3-mile segments of Mission, McCoppin, and Otis Streets between Valencia Street and The Embarcadero. Better Market Street project elements consist of both transportation and streetscape improvements, including changes to roadway configuration and private vehicle access; traffic signals; surface transit, including transit-only lanes, stop spacing, service, stop location, stop characteristics and infrastructure; bicycle facilities; pedestrian facilities; streetscapes;

commercial and passenger loading; vehicular parking; plazas; and utilities. Environmental review has recently been initiated, and will analyze three possible alternatives for the project.

Under this project, Alternatives 1 and 2 involve redesign and improvement of Market Street only, while Alternative 3 would redesign and improve Mission Street in addition to providing the Alternative 1 improvements to Market Street. Alternatives 1 and 2 each have two design options for bicycle facilities on Market Street. Alternative 1 would remove all commercial and passenger loading zones on Market Street, with the exception of paratransit users, and new commercial loading spaces and passenger loading zones would be created on adjacent cross streets and alleys. Under Alternative 2 some commercial loading spaces and passenger loading zones would remain on Market Street, and some commercial loading spaces and passenger loading zones would be created on adjacent cross streets and alleys.

Alternatives 1 and 2 each include two designs for the bicycle facilities on Market Street: Design Option A and Design Option B. Under Alternatives 1 and 2 Design Option A, an enhanced version of the existing shared vehicle and bicycle lane with painted sharrows (shared lane pavement markings) would be provided at locations where a dedicated bicycle facility is not already present. Under Alternatives 1 and 2 Design Option B, a new raised cycle track (an exclusive bicycle facility that is physically separated from motor traffic and is distinct from the sidewalk for the exclusive or primary use of bicycles) the entire length of Market Street would be provided, except at locations where the BART/Muni station entrances or other obstructions would not allow it. Alternative 3 includes the proposed bicycle facilities on Market Street described under Alternative 1, Design Option A and adds a cycle track in both directions and a floating parking lane (located between the travel lane and the cycle track on one side of the street) on Mission Street. Under Alternative 3, the existing transit-only lanes on Mission Street would be removed and Muni, Golden Gate Transit, and San Mateo County Transit District (SamTrans) bus routes would be moved to Market Street. Design, environmental review, selection of the preferred alternative, and approvals will continue through 2017, and construction of improvements is currently anticipated to start in 2018.[13]

[13] Better Market Street Project information available at http://www.bettermarketstreetsf.org/about-common-questions.html, accessed February 14, 2017.

E. Evaluation of Environmental Effects

Topic:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
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?	☐	☐	☒	☐	☐

Impact LU-1: The proposed project would not physically divide an established community. (No Impact)

The division of an established community would typically involve the construction of a physical barrier to neighborhood access, such as a new freeway, or the removal of a means of access, such as a bridge or a roadway. The proposed project would entail partial and full demolition of the buildings located on the project site and construction of five new buildings; one of which (Building A) would incorporate a portion of the existing on-site Lesser Brothers Building proposed to be retained along Market Street. The proposed project would also include rehabilitation of the Civic Center Hotel on the project site (Building C). The proposed project would contain office and assembly, residential, and retail/restaurant uses. The proposed project would be incorporated into the existing block and street configuration, and it would not alter the established street grid, permanently close any streets or impede pedestrian travel through the neighborhood. Rather, the proposed project would construct a new mid-block alley off of Market Street between Brady and 12th Streets and provide access from Stevenson Street to a new publicly-accessible on-site open space, Brady Open Space, located on the northeast corner of Brady and Colton Streets. Thus, the proposed project would create greater pedestrian connectivity within the project area. Although portions of the sidewalks adjacent to the project site would likely be closed for periods of time during project construction, these closures would be temporary in nature and sidewalk access would be restored. The proposed project would not construct a physical barrier to neighborhood access or remove an existing means of access, such as a bridge or roadway. Thus, it would not physically divide the established community. Accordingly, the proposed project would not disrupt or physically divide an established community. Therefore, the proposed project would have ***no impact*** with respect to physically dividing an existing community, and no mitigation measures are necessary.

Impact LU-2: The proposed project would not conflict with any applicable land use plans, policies or regulations of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. (Less than Significant)

The proposed project would not substantially conflict with applicable plans, policies, or regulations, such that an adverse physical change would result. The proposed project would be generally consistent with the land use policies outlined in the Market & Octavia Area Plan, including promoting infill development to fill in gaps in the physical fabric of the neighborhood, providing new housing opportunities, concentrating new uses and the most intense development adjacent to transit services, and strategically located public open spaces. While the

proposed project would require a text amendment to the *Planning Code* regarding the height and bulk limits governing the site, and approval of a Special Use District to reflect other *Planning Code* compliance issues on a site-wide basis, such as open space and narrow street setbacks, those changes would not, in and of themselves, result in adverse physical effects on the environment.

The proposed project would not obviously or substantially conflict with any such adopted environmental plan or policy, such as the BAAQMD 2010 Clean Air Plan, which directly addresses environmental issues and/or contains targets or standards that must be met in order to preserve or improve characteristics of the City's physical environment. See Section C, *Compatibility with Existing Zoning Plans*, for a more detailed discussion. Therefore, the proposed project would have a ***less-than-significant*** impact with regard to conflicts with existing plans and zoning, and no mitigation measures are necessary.

Impact C-LU-1: The proposed project, in combination with past, present, and reasonably foreseeable projects, would not result in a cumulative land use impact. (Less than Significant)

Cumulative development projects located in the vicinity of the project site are identified in **Table 1, Cumulative Projects in a 0.25-Mile Radius of Project Site**, p. 8, and mapped on **Figure 1, Cumulative Projects**, p. 9. The cumulative development projects primarily include mixed-use residential buildings with ground-floor retail, several of which are associated with the proposed Market Street Hub Project. These projects would result in the intensification of land uses in the project vicinity and would be similar to the land uses envisioned under the proposed project. None of the cumulative infill projects would physically divide an established community by constructing a physical barrier to neighborhood access, such as a new freeway, or remove a means of access, such as a bridge or roadway. In addition, the cumulative projects would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Although these development projects would introduce new infill residential, commercial, and office uses in the project vicinity, these uses currently exist in this area. Therefore, the cumulative development projects would not introduce incompatible uses that would adversely impact the existing character of the project vicinity. Thus, the proposed project, in combination with past, present, and reasonably foreseeable future projects, would result in a ***less-than-significant*** cumulative land use impact, and no mitigation measures are necessary.

Topic:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
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?	☐	☐	☒	☐	☐

Impact PH-1: The proposed project would not induce substantial population growth either directly or indirectly. (Less than Significant)

In general, a project would be considered growth-inducing if its implementation would result in substantial population increases either through the development of new homes and businesses, or through the construction of infrastructure, such as the extension of roads, that could lead to substantial new development. The proposed project would involve partial and full demolition of two existing buildings, rehabilitation of one building, and construction of five new buildings that would contain residential units, ground-floor retail/restaurant space, and an assembly hall/office space for a union facility. The three existing buildings on the project site are currently occupied by the UA Local 38, which employs approximately 16 people, various retail uses in the Lesser Brothers Building, which employ approximately 23 people, and the Civic Center Hotel. The Civic Center Hotel is temporarily serving as a Navigation Center, and while acting as such, is housing up to 140 transitional occupants supported by up to 14 employees at a single time.[14] The proposed project would contain up to 584 market-rate and affordable residential units, with approximately 13,000 square feet of ground-floor retail/restaurant space along Market, 12th, and Brady Streets, in addition to an approximately 27,300-square-foot new UA Local 38 building. Therefore, the proposed project would directly increase population and employment at the project site.

The 2010 U.S. Census reported a population of 805,235 residents in the City, and a population of 35,196 residents within the project vicinity, including those census tracts located within 0.25 mile of the project site (Census Tracts 124.02, 176.01, 177, 201, 168.02, 162, 202, 168.01). The addition of the new residential units would increase the residential population on the project site by approximately 921 net new persons.[15] Thus, the proposed project would increase the population of San Francisco by less than 0.11 percent and the population in the vicinity of

[14] Employment data provided by Strada Investment Group via email, September 26, 2016.
[15] The project site is located in Census Tract 201. The population calculation is based on Census 2010 data, which estimates 2.00 persons per household in Census Tract 201, and is used for the residential housing units (477 * 2.00 = 954 persons). For the affordable housing units, only one person per room is allowed; therefore, the population for the 107 affordable housing units would be 107 persons. As such, the total residential population for the proposed project would be 954 + 107 = 1,061. However, the net new residential population would be 1,061 proposed residents – 140 existing residents = 921 net new persons.

the project site by approximately 2.6 percent.[16] The population of San Francisco is projected to increase by approximately 280,490 persons for a total of 1,085,725 persons by 2040.[17] The residential population introduced as a result of the proposed project would constitute approximately 0.33 percent of this population increase. Therefore, this population increase would be accommodated within the planned growth for San Francisco. Overall, this increase in the number of residential units is not considered substantial. Therefore, implementation of the proposed project would not directly induce substantial population growth. The proposed project also would not indirectly induce substantial population growth in the project area because it would be located on an infill site and would not involve any extensions to area roads or other infrastructure that could enable additional development in currently undeveloped areas.

Once completed, the proposed project would generate approximately 67 employees on the project site, including 10 employees for the Colton Street Affordable Housing building, 20 employees for the new UA Local 38 building, and 37 employees for the new retail/restaurant uses.[18] However, of these employees, approximately 16 would be existing UA Local 38 employees who already work in the existing building and would simply relocate to the new building. In addition, approximately 23 people are already employed on the project site in the Lesser Brothers Building, as well as 14 employees associated with the Civic Center Hotel. Therefore, the proposed project would only result in a net new employment growth of 14 people on the project site. The generation of 14 net new employees on the project site would not contribute to or induce substantial population growth in the project area. Furthermore, employment in San Francisco is projected to increase by 34 percent (191,740 jobs) between 2010 and 2040.[19] As such, the net new employment growth would account for only 0.007 percent of the projected job growth in the city; therefore, this increase would be accommodated within the planned employment growth in San Francisco.

Overall, the increase in the residential and employment population on the project site would not result in a substantial increase to the population within the project vicinity or the City. Therefore, the proposed project would not directly or indirectly induce substantial population growth and would have a ***less-than-significant*** impact related to population growth. No mitigation measures are necessary.

Impact PH-2: The proposed project would not displace a substantial number of existing housing units, people, or create demand for additional housing elsewhere. (Less than Significant)

As noted above, the existing uses on the project site currently include a temporary Navigation Center and office and retail uses, which employ an estimated 53 people. Long-term residents (approximately 50) in the protected SRO units at the Civic Center Hotel would have the option of relocating to the new Colton Street Affordable Housing building once it is completed, and occupants of the temporary Navigation Center would have the

[16] U.S. Census Bureau, American Factfinder, Census Tract 201, San Francisco County, CA, 2010. Available at factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk, accessed September 28, 2016. This calculation is based on the estimated Census 2010 population of 805,235 persons in the City of San Francisco.

[17] ABAG, *Plan Bay Area*, adopted July 2013, p. 40. Available at http://files.mtc.ca.gov/pdf/Plan_Bay_Area_FINAL/Plan_Bay_Area.pdf, accessed August 2, 2016.

[18] The estimated number of employees is based on the San Francisco Planning Department's *Transportation Impact Analysis Guidelines for Environmental Review* (October 2002) and assumes an average of one employee per 350 square feet for retail and restaurant uses (13,000 / 350 = 37 employees). Projected employment data provided by Strada Investment Group via email, September 26, 2016.

[19] ABAG and MTC, *Jobs-Housing Connection Strategy*, revised May 16, 2012, p. 49. Available at http://www.planbayarea.org/pdf/JHCS/May_2012_Jobs_Housing_Connection_Strategy_Main_Report.pdf, accessed August 8, 2016.

option of transferring to another Navigation Center. Therefore, the proposed project would not permanently displace any existing housing units or people on the project site. The 16 employees associated with the existing UA Local 38 building would transfer to the new UA Local 38 building. Similarly, most of the employees associated with the Civic Center Hotel would transfer to the new Colton Street Affordable Housing building. Therefore, only 23 employees associated with the Lesser Brothers Building would be displaced by the proposed project. Approximately 37 new jobs would be created by the retail/restaurant uses, which would result in 14 net new jobs created by the proposed project. While these new employment opportunities would likely create a demand for housing, the increase would not be substantial, and construction of up to 584 new residential units as part of the proposed project would likely offset some of the new demand for housing. Therefore, the proposed project would have a ***less-than-significant*** impact related to the displacement of housing, as well as the creation of demand for new housing elsewhere, and no mitigation measures are necessary.

Impact C-PH-1: The proposed project would not make a considerable contribution to any cumulative significant effects related to population or housing. (Less than Significant)

Plan Bay Area, which is the current regional transportation plan and Sustainable Communities Strategy that was adopted by MTC and ABAG in July 2013, contains housing and employment projections anticipated to occur in San Francisco through 2040. *Plan Bay Area* calls for an increasing percentage of Bay Area growth to occur as infill development in areas with good transit access and where services necessary to daily living are provided in proximity to housing and jobs. With its abundant transit service and mixed-use neighborhoods, San Francisco is expected to accommodate an increasing share of future regional growth. Additionally, the project site is in the Market-Octavia/Upper Market Priority Development Areas identified in *Plan Bay Area*.[20] Therefore, the *Plan Bay Area* projections provide context for the population and housing cumulative analysis.

The approved and proposed projects identified in **Table 1, Cumulative Projects in a 0.25-Mile Radius of Project Site**, p. 8, and mapped on **Figure 1, Cumulative Projects**, p. 9, would add approximately 7,108 new residents within 3,554 new dwelling units located within 0.25 mile of the project site.[21] Overall, these approved and proposed projects, when combined with the proposed project, would add 8,029 net new residents in the project vicinity, which would represent a residential population increase of approximately22.8 percent.[22]

In the last few years, the supply of housing has not met the demand for housing within San Francisco. In July 2013, ABAG projected regional housing needs in the *Regional Housing Need Plan for the San Francisco Bay Area: 2014–2022*. In 2013, ABAG projected housing needs in San Francisco of 28,869 dwelling units, consisting of 6,234 dwelling units within the very low income level (0–50 percent), 4,639 within the low income level (51–80 percent), 5,460 within the moderate income level (81–120 percent), and 12,536 within the above-moderate income level (120 percent plus).[23] As noted above, as part of the planning process for *Plan Bay Area*, San Francisco identified Priority Development Areas, which are existing neighborhoods near transit that are appropriate

[20] ABAG, *Plan Bay Area*, Priority Development Area Showcase. Available at http://gis.abag.ca.gov/website/PDAShowcase/, accessed August 8, 2016.
[21] Assumes the Census Tract 201 average of two persons per unit (3,554 units x 2.00 persons per unit = 7,108 persons).
[22] The population estimate of 35,196 persons is based on data from the 2010 Census for the Census Tracts in which the cumulative projects (within 0.25 mile of the project site) are located: 124.02, 176.01, 177, 201, 168.02, 162, 202, and 168.01.
[23] ABAG, *Regional Housing Need Plan for the San Francisco Bay Area: 2014–2022*, p. 24. Available at http://planbayarea.org/pdf/final_supplemental_reports/Final_Bay_Area_2014-2022_RHNA_Plan.pdf, accessed August 8, 2016.

places to concentrate future growth, and the project site is in the Market-Octavia/Upper Market Priority Development Area. In addition, several cumulative projects identified in **Table 1, Cumulative Projects in a 0.25-Mile Radius of Project Site**, p. 8, are located within the Market Street Hub Plan area. The Hub Plan area is proposed in the vicinity of Market Street and Van Ness Avenue to become a new vibrant, mixed-use neighborhood. Projects in this area would consist of mixed-use towers ranging from 250 to 400 feet in height constructed on large sites around this transportation hub.[24] Thus, although the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would increase the population in the vicinity of the project site by 22.8 percent, this population growth has been anticipated and accounted for according to the City's and ABAG's projections and planned growth. Therefore, this would have a less-than-significant impact on the physical environment. Furthermore, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in substantial numbers of housing units or people being displaced because the majority of the approved and proposed cumulative projects would be constructed on underutilized lots, and the project does not include residential displacement. For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in cumulative significant impacts to population or housing, and no mitigation measures are necessary.

Based on the conservative assumption that all new employees in the City would be new San Francisco residents, an estimated 2,154 new employees (including the 14 net new employees associated with the proposed project) would be added within the vicinity of the project site.[25] The 2,154 new employees would generate a potential demand for 1,696 new dwelling units.[26] Based on ABAG's projected housing needs in San Francisco, the employment-related housing demand associated with the proposed project, as well as nearby cumulative development projects could be accommodated by the City's projected housing growth of 28,869 units.[27] Furthermore, the proposed project, as well as nearby cumulative development projects would add to the City's housing stock and could potentially accommodate some of the new employment-related housing demand. In combination with the past, present, and reasonably foreseeable projects, the estimated employment growth would account for only approximately 5.9 percent of projected citywide household growth.

For these reasons, the proposed project in combination with other past, present, and reasonably foreseeable future projects would result in a ***less-than-significant*** cumulatively considerable contribution to a significant population and housing impact. Other sections of this document that address physical environmental impacts related to cumulative growth with regard to specific resources can be found in Topic E.4, *Transportation and Circulation*; Topic E.5, *Noise*; Topic E.6, *Air Quality*; Topic E.9, *Recreation*; Topic E.10, *Utilities and Service Systems*; and Topic E.11, *Public Services*.

[24] San Francisco Planning Department, *The Market Street Hub Project*, 2016. Available at http://sf-planning.org/market-street-hub-project, accessed August 8, 2016.

[25] The estimated number of employees is based on the San Francisco Planning Department's *Transportation Impact Analysis Guidelines for Environmental Review* (October 2002) and assumes an average of one employee per 350 square feet for retail and restaurant uses (350 total employees), and one employee per 276 square feet of office use (1,777 employees). The child care facility employee generation rate is based on the staff-child ratio of one staff member per six children recommended by the National Association for the Education of Young Children, which would yield 13 staff members. Available at http://childcareaware.org/child-care-providers/management-plan/staffing, accessed June 15, 2016. Therefore, the total number of employees for all uses introduced by cumulative projects would be 2,140 employees.

[26] Assumes the *2014 Housing Element* figure of 1.27 workers per household for San Francisco in 2015.

[27] ABAG, *Regional Housing Need Plan for the San Francisco Bay Area*, p. 24.

Topic:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
3. CULTURAL 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 archeological resource pursuant to §15064.5?	☐	☒	☐	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐	☐
d) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code §21074?	☐	☒	☐	☐	☐

CEQA Guidelines Section 15064.5 requires the lead agency to consider the effects of a project on historical resources. A historical resource is defined as a building, structure, site, object, or district (including landscapes) listed in or determined to be eligible for listing in the California Register of Historical Resources (California Register), or determined by a lead agency to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, or cultural annals of California.

The proposed project could result in impacts to historical architectural resources as a result of the rehabilitation of the Civic Center Hotel and the demolition of a majority of the Lesser Brothers Building, both identified as historical resources.[28] For the purposes of this Initial Study, impacts to historical resources are identified as ***potentially significant***. Project effects on historical architectural resources have been analyzed in Section IV.A, *Historical Architectural Resources*, of the DEIR to which this Initial Study is attached, which has also determined the significance of the project's impacts and developed mitigation measures, as feasible, to reduce those impacts found to be significant.

Impacts CR-1 through CR-5 are included in Section IV.A, *Historic Architectural Resources*, of the DEIR to which this Initial Study is attached. Therefore, this discussion begins with Impact CR-6.

Impact CR-6: The proposed project could cause a substantial adverse change in the significance of an archeological resource. (Less than Significant with Mitigation)

This section discusses archeological resources, both as historical resources according to CEQA Guidelines Section 15064.5, as well as unique archeological resources as defined in Section 21083.2(g).

The potential for encountering archeological resources is determined by several relevant factors including archeological sensitivity criteria and models, local geology, site history, and the extent of potential projects soils disturbance/modification, as well as any documented information on known archeological resources in the area. A San Francisco Planning Department archeologist completed a preliminary archeological review for the proposed project and determined that the project has the potential to adversely affect legally-significant

[28] San Francisco Planning Department, *Historic Resource Evaluation Response: 1601–1629 Market Street*, September 13, 2016.

archeological resources as a result of the excavation of approximately 30 feet below ground surface (bgs) for up to two sub-grade levels, a mat foundation, and soils improvement.[29] Specifically, there is the potential to affect Late Holocene and Middle Holocene prehistoric archeological deposits. There is also the potential to affect historical archeological deposits that could be legally significant depending on the potential of the deposit to address important historical archeological research questions and the integrity of the deposit/feature.

Prehistoric Archeological Resource Potential

The San Francisco Bay Area has undergone dramatic landscape changes since humans began to inhabit the region more than 13,000 years ago. Rising sea levels and increased sedimentation into streams and rivers are among some of the changes.[30] In many places, the interface between older land surfaces and younger geologic formations are marked by a well-developed buried soil profile known as a paleosol. Paleosols represent land forms in the past that were stable and thus suitable for human habitation prior to subsequent sediment deposition; therefore, paleosols have the potential to preserve archeological resources if humans occupied or settled the area.[31]

The results of the geotechnical investigation indicate the project area is generally underlain by fill, which ranges in thickness from about one to 10 feet.[32] The fill consists of very loose to medium dense sand with occasional debris. The fill is generally underlain by dune sand, which extends to a depth of about 15 to 27 feet. The dune sand is underlain by the clayey sand, clayey silty sand, sandy clay, and silty clay of a marsh deposit. The marsh deposit varies in thickness from about five to 10 feet. Below the marsh deposit is medium dense to very dense sand, silty sand, clayey sand, and clayey silty sand of the Colma formation. The Colma extends to a depth of 194 feet, where explored.

Prior to historic period development, the northern San Francisco peninsula was the site of one of the largest dune fields in the Bay Area—in large part due to its high exposure to westerly winds coming off the Pacific Ocean and the abundant supply of sediment from Ocean and Baker beaches. Two generations of dunes, separated by bay mud and clay, have been recognized on the eastern side of San Francisco.[33] Relatively intact concentrations of Late Holocene-age archeological materials have been buried and preserved by dune migration, especially in more inland locations that exhibit multiple depositional episodes. One Late Holocene shell midden site (CA-SFR-148) is in the vicinity of the project area. In the project area, the presence of fill overlying native sand dune may indicate that sand dunes within the project area were not cut or leveled in the historic period and that if there are prehistoric deposits they may have good physical integrity. It is also possible that prior excavation in the project area may have removed, disturbed or truncated any prehistoric deposits (as well as any historical archeological deposits).

[29] Dean, Randall, Email to Debra Dwyer, Environmental Planning from Randall Dean, Archeologist with Environmental Planning titled 1601 Market Street Project (2015-005848ENV) – archeological sensitivity, September 15, 2016.
[30] Helley, E.J., K.R. LaJoie, W.E. Spangle, and M.L. Bair, Flatland Deposits of the San Francisco Bay Region, California. U.S. Geological Survey Professional Paper 943, 1979.
[31] Meyer, Jack, and Jeffrey Rosenthal, Geoarchaeological Overview of the Nine Bay Area Counties in Caltrans District 4. Prepared for California Department of Transportation, District 4, Oakland, CA, 2007.
[32] Langan Treadwell Rollo, Preliminary Geotechnical Investigation, 1629 Market Street. Prepared for Strada Investment Group, July 5, 2016.
[33] Schlocker, Julius, Geology of the San Francisco North quadrangle, California: U.S. Geological Survey, Professional Paper 782, 1974.

Below the dune sand is a marsh deposit five to 10 feet thick. Buried marsh deposits in San Francisco generally have a relatively low prehistoric archeological potential except where they represent what is called the "paleoshoreline", which is the former shorelines of older marshes, estuaries, lagoons or bays. Increasingly in San Francisco prehistoric sites dating from the Middle Holocene (approximately 8200 to 4200 years before present [BP]) have been identified in Late Bay Mud (i.e. old marsh deposits) at great depths (50 to 75 feet bgs). In the SoMa area a large tidal marsh, historically known as "Sullivan's Marsh", extended northward of Mission Bay and reached northwestward to a point around Stevenson Street between Seventh and Eighth Streets. The project area is approximately 2,500 feet from the historic period shoreline of Sullivan's Marsh and in later periods may have been much closer to the paleoshoreline.

Beneath the marsh deposit is the Middle Holocene-age Colma formation. The Colma formation is a sand dune deposit that formed around approximately 12,000 years BP and was available for human occupation for thousands of years. In San Francisco, the upper three feet of the Colma formation, which was the land surface exposed during the Middle Holocene, is considered to be sensitive for deeply buried Middle Holocene archeological deposits. The project area contains Colma formation deposits below the Middle Holocene marsh deposits at a depth of 21 to 28 feet bgs.

Historical Archeological Resource Potential

The 1869 U.S. Coast Survey map is the first historic map that shows building development in the project area; the exact nature of this development is not currently known. By the 1880s the project area was developed with several smaller, largely one-story residences, and a mixture of businesses and manufacturers, including a stock yard, a wood and coal dealer, a junk merchant, a horse collar manufacturer, a marble works, and a wagon and blacksmith shop.[34] Much of the building inventory on the interior part of the project area is described on the Sanborn maps as "dilapidated," which would imply the structures are old. A brief review of U.S. Census data and City Directories indicate the project area and vicinity was occupied by residents representing a variety of ethnicities, countries of origin, and occupations. A snapshot from the 1880 U.S. Census shows numerous residents from Canada, as well as Ireland, France, and the United States and included a shoemaker, saloon keeper, and a judge.

The project area was decimated during the fire that followed the 1906 earthquake. No buildings survived the conflagration. The project area was reconstructed comparatively quickly, though many of the new buildings were only temporary structures. Similar to pre-earthquake conditions, the project area contained many different uses, including commercial, retail, industrial, and residential. The 1913 Sanborn maps show the Dolan Wrecking & Construction Company occupying much of the project area. The company did salvage contracting and sold salvaged building materials. Initially the company, like others in the area, sold materials salvaged from buildings wrecked (but not burned) in the 1906 earthquake, including wood framing, doors, window sashes, glass, newel posts, mantels, light and plumbing fixtures, and hardwood flooring. After this supply was exhausted, these companies turned to materials salvaged from buildings they were hired to demolish.[35] The rest of the project area was occupied by residential buildings, including five flats facing Brady Street and Colton Street, a small cottage on the south side of Stevenson Street, and the Eagle Laundry on the south side of Colton Street. A brief review of U.S. Census data indicates that like the pre-earthquake neighborhood there were a

[34] Sanborn Fire Insurance Company: Sanborn Maps for San Francisco: 1886.
[35] VerPlanck Historic Preservation Consulting, *Historic Resource Evaluation Market and Brady Project*, June 2016.

variety of ethnicities and occupations represented by residents in the project area, including residents from Ireland, Scotland, Wales, France, Sweden, Finland, Canada, and the United States.

Although all residential and commercial buildings in the project area were destroyed in 1906, subsurface features such as privies, wells, and trash pits may have survived the destruction and were subsequently buried by rubble and fill. Based on the geotechnical investigation the project area is underlain by fill ranging in thickness from approximately one to 10 feet. Historical archeological deposits are generally identified in the upper six feet bgs. Based on historic maps and the presence of historical archeological sites identified in a similar context in the vicinity, there is a moderate to high potential that subsurface features associated with mid-to-late-nineteenth century occupation of the area may be preserved below the existing development.

In summary, there is the potential for the proposed project to adversely impact legally-significant prehistoric and historical archeological resources. In order to reduce the potential impact on archeological resources to a less-than-significant level, an archeological testing plan (ATP) is required to identify any archeological resources potentially present. In accordance with **Mitigation Measure M-CR-6, Archeological Testing**, the project sponsor would be required to engage an archeologist from the Department Qualified Archeological Consultants List to develop and implement an ATP. Implementation of **Mitigation Measure M-CR-6** would reduce the impact to a ***less-than-significant*** level.

> **Mitigation Measure M-CR-6 – Archeological Testing.** Based on a reasonable presumption that archeological resources may be present within the project area, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of an archeological consultant from the rotational Department Qualified Archeological Consultants List (QACL) maintained by the Planning Department archeologist. The project sponsor shall contact the Department archeologist to obtain the names and contact information for the next three archeological consultants on the QACL. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Section 15064.5(a) and (c).
>
> *Consultation with Descendant Communities:* On discovery of an archeological site[36] associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group,

[36] The term "archeological site" is intended here to minimally include any archeological deposit, feature, burial, or evidence of burial.

an appropriate representative[37] of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to offer recommendations to the ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Final Archeological Resources Report shall be provided to the representative of the descendant group.

Archeological Testing Program. The archeological consultant shall prepare and submit to the ERO for review and approval an archeological testing plan (ATP). The archeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, the testing method to be used, and the locations recommended for testing. The purpose of the archeological testing program will be to determine to the extent possible the presence or absence of archeological resources and to identify and to evaluate whether any archeological resource encountered on the site constitutes an historical resource under CEQA.

At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the ERO. If based on the archeological testing program the archeological consultant finds that significant archeological resources may be present, the ERO in consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or an archeological data recovery program. No archeological data recovery shall be undertaken without the prior approval of the ERO or the Planning Department archeologist. If the ERO determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

A. The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or

B. A data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

Archeological Monitoring Program. If the ERO in consultation with the archeological consultant determines that an archeological monitoring program shall be implemented the archeological monitoring program shall minimally include the following provisions:

- The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils- disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, site remediation, etc., shall require archeological monitoring because of the risk these activities pose to potential archeological resources and to their depositional context;

[37] An "appropriate representative" of the descendant group is here defined to mean, in the case of Native Americans, any individual listed in the current Native American Contact List for the City and County of San Francisco maintained by the California Native American Heritage Commission and in the case of the Overseas Chinese, the Chinese Historical Society of America. An appropriate representative of other descendant groups should be determined in consultation with the Department archeologist.

- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;
- The archeological monitor(s) shall be present on the project area according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;
- The archeological monitor shall record and be authorized to collect soil samples and artefactual/ecofactual material as warranted for analysis;
- If an intact archeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/construction activities and equipment until the deposit is evaluated. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO.

Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO.

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

If required, the scope of the ADRP shall include the following elements:

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

- *Curation*—Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

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

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

Impact CR-7: The proposed project could disturb human remains, including those interred outside of dedicated cemeteries. (Less than Significant with Mitigation)

There are no known human remains, including those interred outside of dedicated cemeteries, located in the immediate vicinity of the project area. In the event that construction activities disturb unknown human remains within the project area, any inadvertent damage to human remains would be considered a significant impact. With implementation of **Mitigation Measure M-CR-7, Inadvertent Discovery of Human Remains**, the proposed project would have a ***less-than-significant*** impact in the event of an inadvertent discovery of human remains.

Mitigation Measure M-CR-7 – Inadvertent Discovery of Human Remains. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and the ERO, 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) (*Public Resources Code* Section 5097.98). The archeological consultant, project sponsor, ERO, and MLD shall have up to but not beyond six days of discovery to make all reasonable efforts to develop an agreement for the treatment of human remains and associated or unassociated funerary objects with appropriate dignity (CEQA Guidelines Section 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. Nothing in existing State regulations or in this mitigation measure compels the project sponsor and the ERO to accept recommendations of an MLD. The archeological consultant shall retain possession of any Native American human remains and associated or unassociated burial objects until completion of any scientific analyses of the human remains or objects as specified in the treatment agreement if such as agreement has been made or, otherwise, as determined by the archeological consultant and the ERO.

Impact CR-8: The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074. (Less than Significant with Mitigation)

CEQA Section 21074.2 requires the lead agency to consider the effects of a project on tribal cultural resources. As defined in Section 21074, tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are listed, or determined to be eligible for listing, on the national, state, or local register of historical resources. Pursuant to State law under Assembly Bill 52 (*Public Resources Code* Section 21080.3.1), on September 26, 2016, the Planning Department requested consultation with Native American tribes regarding possible significant effects that the proposed project may have on tribal cultural resources. The Planning Department received no response concerning the proposed project.

Based on the background research there are no known tribal cultural resources in the project area; however, based on the archeological sensitivity assessment there is the potential for prehistoric archeological resources to be in the project area. Prehistoric archeological resources may also be considered tribal cultural resources. In the event that construction activities disturb unknown archeological sites that are considered tribal cultural resources, any inadvertent damage would be considered a significant impact. With implementation of **Mitigation Measure M-CR-8, Tribal Cultural Resources Interpretive Program**, the proposed project would have a ***less-than-significant*** impact on previously unknown tribal cultural resources.

> **Mitigation Measure M-CR-8 – Tribal Cultural Resources Interpretive Program.** If the ERO determines that a significant archeological resource is present, and if in consultation with the affiliated Native American tribal representatives, the ERO determines that the resource constitutes a tribal cultural resource (TCR) and that the resource could be adversely affected by the proposed project, the proposed project shall be redesigned so as to avoid any adverse effect on the significant tribal cultural resource, if feasible.
>
> If the Environmental Review Officer (ERO), in consultation with the affiliated Native American tribal representatives and the Project Sponsor, determines that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option, the Project Sponsor shall implement an interpretive program of the TCR in consultation with affiliated tribal representatives. An interpretive plan produced in consultation with the ERO and affiliated tribal representatives, at a minimum, and approved by the ERO would be required to guide the interpretive program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, artifacts displays and interpretation, and educational panels or other informational displays.

Impact C-CR-2: The proposed project in combination with past, present, and reasonably foreseeable future projects in the vicinity could result in cumulative impacts to archeological resources, tribal cultural resources, and human remains. (Less than Significant with Mitigation)

Archeological resources, tribal cultural resources, and human remains are non-renewable resources of a finite class. All adverse effects to archeological resources erode a dwindling cultural/scientific resource base. Federal and state laws protect archeological resources in most cases, either through project redesign or by requiring that the scientific data present within an archeological resource be archeologically recovered. As discussed above,

the proposed project could have a significant impact related to archeological resources, tribal cultural resources, and disturbance of human remains. The project's impact, in combination with other projects in the area that would also involve ground disturbance and that could also encounter previously recorded or unrecorded archeological resources, tribal cultural resources, or human remains, could result in a significant cumulative impact. However, implementation of **Mitigation Measures M-CR-6**, **M-CR-7**, and **M-CR-8** (as previously described) would reduce the project's contribution to cumulative impacts to a ***less-than-significant*** level.

Topic:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
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 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 project has the potential to result in a significant, cumulative transportation-related construction impact; therefore, for ease of reference all Transportation and Circulation topics are included together in the EIR.

The proposed project would generate new traffic to and from the project site and would increase demand on the local transportation system, including the roadway network, transit service, pedestrian and bicycle facilities, vehicle parking, and passenger and freight loading/service vehicle accommodations, which could result in ***significant*** transportation and cumulative impacts. In particular, the proposed project could conflict with plans, ordinances, or policies addressing the safety or performance of the circulation system. The proposed project may also cause substantial additional vehicle miles traveled (per capita, per service population, or other appropriate efficiency measure). The proposed project would not substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow travel lanes) or by adding new roadways to the network; however, it would introduce new and intensified land uses at the project site and implement various changes to circulation patterns. Therefore, project effects on transportation and circulation including conflicts with a plan, ordinance, or policy, the addition of vehicle miles traveled, and

the adequacy of emergency access has been analyzed in the DEIR to which this Initial Study is attached, which has also determined the significance of the proposed project's impacts on the transportation and circulation system based on a detailed transportation impact study.

As discussed in Section D, *Summary of Environmental Effects*, on September 27, 2013, Governor Brown signed SB 743, which became effective on January 1, 2014, and amended CEQA by adding Section 21099 regarding analysis of aesthetics and parking impacts for urban infill projects. Key provisions of CEQA Section 21099(d) include reforming the analysis of aesthetics and parking impacts for urban infill projects pursuant to CEQA. The proposed project consists of a mixed-use residential project and meets the definition of an employment center, located on an infill site in a transit priority area as discussed under Section D, *Summary of Environmental Effects*, above.[38] Accordingly, parking impacts can no longer be considered in determining the significance of the proposed project's physical environmental effects under CEQA. Therefore, Section IV.B, *Transportation and Circulation*, of the DEIR to which this Initial Study is attached includes a parking demand analysis for informational purposes. However, this Initial Study and DEIR have also considered any secondary physical impacts associated with constrained parking supply (e.g., queuing by drivers waiting for scarce onsite parking spaces that may affect the public right-of-way) as applicable in the transportation, air quality, noise, and pedestrian safety analyses.

[38] San Francisco Planning Department, *Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis for 1629 Market Street, Case No. 2015-005848ENV*, June 7, 2016.

Topic:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
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?	☐	☐	☒	☐	☐

An Environmental Noise Assessment Report was prepared for the proposed project and was used as a resource in determining the potential significance of noise impacts and identifying any needed mitigation measures.[39]

The project site is not within an airport land use plan area,[40] nor is it in the vicinity of a private airstrip. Therefore, checklist Questions 5(e) and 5(f) are not applicable.

Impact NO-1: The proposed project could result in the exposure of persons to or generation of noise levels in excess of established standards, and could result in a substantial permanent increase in ambient noise levels or otherwise be substantially affected by existing noise. (Less than Significant with Mitigation)

Applicable Noise Standards

The Environmental Protection Element of the *General Plan* contains Land Use Compatibility Guidelines for Community Noise. These guidelines, which are similar to state guidelines promulgated by the Governor's Office of Planning and Research (OPR), indicate maximum acceptable noise levels for various newly developed land uses. For the residential land use proposed as part of the project, the maximum "satisfactory, with no special insulation requirements" exterior noise levels are approximately 60 dBA (DNL). The dBA, or A-weighted decibel, refers to a scale of noise measurement that approximates the range of sensitivity of the human ear to sounds of different frequencies. On this scale, the normal range of human hearing extends from about 0 dBA to about 140 dBA. A 10 dBA increase in the level of a continuous noise represents a perceived doubling of loudness;

[39] Charles M. Salter Associates, Inc., *Environmental Noise Assessment – 1629 Market Street*, October 12, 2016.
[40] City/County Association of Governments (C/CAG) of San Mateo County, *Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport*, November, 2012. See also, Alameda County Community Development Agency (ACCDA), *Oakland International Airport, Airport Land Use Compatibility Plan*, December 2012.

the DNL or L_{dn} is the L_{eq}, or Energy Equivalent Level, of the A-weighted noise level over a 24-hour period with a 10 dB penalty applied to noise levels between 10:00 p.m. to 7:00 a.m. L_{eq} is the level of a steady noise that would have the same energy as the fluctuating noise level integrated over the time period of interest. Where exterior noise levels exceed a DNL of 60 dBA for a new residential building, it is generally recommended that a detailed analysis of noise reduction requirements be conducted prior to final review and approval of the project, and that the needed noise insulation features be included in the project design.

In addition, Chapter 12 of the *California Building Code* (CBC) (Part 2 of Title 24 of the *California Code of Regulations*), adopted as part of the *San Francisco Building Code*, contains acoustical requirements for interior sound levels in habitable rooms of multi-family developments. In summary, the CBC requires an interior noise level no higher than a DNL of 45 dBA. Projects exposed to an exterior DNL of 60 dB, or greater, require an acoustical analysis showing that the proposed design will limit interior noise levels to the prescribed allowable interior level. Additionally, if windows must be in the closed position to meet the interior standard, the design must include a ventilation or air-conditioning system to provide fresh-air; this would be required under Article 38 of the City's *Health Code* for a habitable interior environment.

The San Francisco Noise Ordinance is enforced through San Francisco Police Code Article 29. Section 2907 restricts noise from the operation of individual pieces of construction equipment to 80 dBA when measured at a distance of 100 feet from the equipment. The limit does not apply to impact tools and equipment provided they have intake and exhaust mufflers, and pavement breakers and jackhammers are also equipped with acoustically attenuating shields or shrouds recommended by the manufacturers and approved by the Director of Public Works or the Director of Building Inspection as best accomplishing maximum noise attenuation.

San Francisco Police Code Section 2909(a)(1) specifies Residential Property Noise Limits, which restrict noise from residential areas to a noise level more than five dBA above the ambient at any point outside of the property plane. Section 2909(b) includes similar restrictions for noise from commercial and industrial properties and restricts such noise to not more than eight dBA above the local ambient at any point outside of the property plane.

Further, Section 2909(d) specifies Fixed Residential Interior Noise Limits in order to prevent sleep disturbance, protect public health, and prevent the acoustical environment from progressive deterioration due to the increasing use and influence of mechanical equipment. This requires that noise from fixed sources, such as mechanical equipment, shall not cause the noise level measured inside any sleeping or living room in any dwelling unit located on 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.

Existing Noise in Project Site Vicinity

Ambient noise levels in the project vicinity are typical of noise levels found in San Francisco, which are dominated by vehicular traffic, including, cars, trucks, Muni buses, and emergency vehicles. Market Street and South Van Ness Avenue are both heavily traveled streets, and generate traffic noise in excess of 70 dBA at ground level

locations.[41] While land uses in the project site vicinity do not generate a substantial amount of noise, high traffic volumes along the surrounding streets result in a relatively loud ambient noise environment.[42]

Four long-term (72-hour) continuous noise measurements and three short-term (15-minute) measurements were conducted at locations at and around the project site in order to quantify the existing noise environment in the project vicinity. The results of the noise measurements are provided in **Table 2, Existing Noise Environment in the Project Site Vicinity**, p. 30. The four long-term (LT) measurements were conducted over a period of one full weekday and a weekend, while the short-term (ST) measurements were conducted during the afternoon peak hours on a weekday to represent worst-case conditions. **Table 2** shows average L_{eq} over the measurement period, average L_{50}, average L_{90} and the calculated DNL at the measurement locations. L_{50} and L_{90} are the average noise levels exceeded 50 percent and 90 percent of the time, respectively during the measurement period.

TABLE 2 EXISTING NOISE ENVIRONMENT IN THE PROJECT SITE VICINITY

Measurement Location	Date and Time Period (measurement)	Average L_{eq}, dBA	Average L_{50}, dBA	Average L_{90}, dBA	DNL, dBA
LT-1. South Van Ness Avenue, approximately 40 feet from Van Ness and 375 feet from Market Street.	06/03/16–06/07/16 72-hour	73.3	69.4	61.4	79.5
LT-2. Market Street, approximately 40 feet from Market and 240 feet from 12th Street.	06/03/16–06/07/16 72-hour	68.7	65.1	59.2	76.4
LT-3. On Gough Street, approximately 30 feet from Gough and 350 feet from Market Street.	06/03/16–06/07/16 72-hour	61.9	58.0	53.7	67.6
LT-4. On Otis Street, approximately 30 feet from Otis and 325 feet from Van Ness.	06/03/16–06/07/16 72-hour	67.6	62.1	56.9	73.3
ST-1. 12th & Stevenson Street, approximately 30 feet from 12th and 245 feet from Market Street.	06/07/16 15-minute	59.9	58.0	56.6	—
ST-2. Brady & Colton Streets, approximately 20 feet from Brady and 340 feet from Market Street.	06/07/16 15-minute	62.9	57.9	55.7	—
ST-3. On the roof at 12th & Stevenson Street, approximately 35 feet from 12th and 245 feet from Market Street.	06/07/16 15-minute	63.7	63.0	61.8	—

SOURCE: Charles M. Salter Associates, September 2016.

Sensitive Receptors in the Project Site Vicinity

The project site is bounded by Market Street to the north, 12th Street to the east, Brady Street to the west, and Chase Court to the south. Retail and mixed-use buildings abut the proposed project boundary to the south. The project neighborhood is a densely built urban area containing a variety of uses including residential and mixed-use buildings, hotels, religious and community facilities, health care facilities, commercial and office buildings, automobile dealerships, and a few public parks.

Land uses immediately surrounding the project site consist primarily of low- to mid-rise commercial buildings, including automobile-oriented businesses and urgent care medical services, and mid- to high-rise residential

[41] San Francisco Department of Public Health, Map of Areas Potentially Requiring Noise Insulations, March 2009. Available at http://www.sf-planning.org/ftp/files/publications_reports/library_of_cartography/Noise.pdf.

[42] The noise study included a test point located 80 feet from the BART ventilation structure, hence the analysis considered this land use in the baseline. Charles M. Salter Associates, Inc., Environmental Noise Assessment – 1629 Market Street, October 12, 2016.

buildings with neighborhood-serving retail uses on the ground floor along Market Street. Several community facilities, including the San Francisco Conservatory of Music, the International High School and the Chinese American International School, and the San Francisco Law School are located north of the project site near Market Street, and the City College of San Francisco has an auditorium and administrative offices located at 33 Gough Street, west of the project site. The project site is immediately surrounded by a mix of 25- to 85-foot-tall commercial, residential, community facility, and light industrial buildings. The nearest sensitive receptors to the project site are residential uses located less than 50 feet to the west (1651 Market Street; about 40 feet west) and south (77 Colton and 65 Brady Street; about 33 feet south) of the project site.

Noise Exposure of Project Receptors[43]

As noted above, the proposed project would include new sensitive receptors in the form of residences. While the effects of the existing noise environment on the proposed receptors are currently outside of the scope of CEQA, noise sources, such as ventilation or air-conditioning systems, generated by the proposed project could impact these future residences once they are occupied.

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 Title 24 acoustical requirement for residential structures is incorporated into Section 1207 of the San Francisco Building Code and requires these structures be designed to prevent the intrusion of exterior noise so that the noise level with windows closed, attributable to exterior sources, shall not exceed 45 dBA in any habitable room. 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, DBI 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 DBI, a detailed acoustical analysis of the exterior wall and window assemblies may be required.

Additionally, the proposed project would be subject to the Noise Regulations Relating to Residential Uses Near Places of Entertainment (Ordinance 70-15, effective June 19, 2015). The intent of these regulations is to address noise conflicts between residential uses in noise critical areas, such as in proximity to highways and other high-volume roadways, railroads, rapid transit lines, airports, nighttime entertainment venues or industrial areas. In accordance with the adopted regulations, residential structures to be located where the day-night average sound level (L_{dn}) or community noise equivalent level (CNEL) exceeds 60 dBA shall require an acoustical analysis with the application of a building permit showing that the proposed design would limit exterior noise to 45 dBA in any habitable room. Furthermore, the regulations require the Planning Department and Planning Commission to consider the compatibility of uses when approving residential uses adjacent to or near existing permitted places of entertainment and take all reasonably available means through the City's design review and approval processes

[43] 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). Accordingly, the discussion of exposure of the proposed project's future residents to existing ambient noise is provided for informational purposes only.

to ensure that the design of new residential development projects take into account the needs and interests of both the places of entertainment and the future residents of the new development.

Noise from Proposed Project Operations

Trips associated with the proposed project would be distributed over the local street network and would affect roadside noise levels. The traffic noise analysis is based on the Transportation Impact Study prepared by Fehr & Peers, dated February 2017. The proposed project is estimated to generate approximately 1,471 net new daily vehicle trips, with 177 and 226 of those trips occurring in the a.m. and p.m. peak hours, respectively.[44]

Peak-hour intersection turning data from the traffic study were analyzed to evaluate increases and resulting traffic-generated noise increases on roadway links most affected by project-related traffic. In general, traffic noise increases of less than three dBA are barely perceptible to people, while a five dBA increase is readily noticeable.[45] Therefore, permanent increases in ambient noise levels of more than five dBA are considered to be unacceptable and a significant noise impact in any existing or resulting noise environment. However, in places where the existing or resulting noise environment is "Conditionally Acceptable," "Conditionally Unacceptable," or "Unacceptable" based on the San Francisco Land Use Compatibility Chart for Community Noise, any noise increase greater than three dBA is considered a significant noise impact.
Peak hour (evening) intersection turning data from the transportation study was analyzed to evaluate resulting traffic-generated noise increases on roadway links most affected by proposed project-related traffic and nearest to the project area. The segments analyzed and the results of the noise increases resulting from modeling are shown in **Table 3, Peak-Hour Traffic Noise Levels in the Vicinity of the Project Area**, p. 33. For all roadways except Market Street and Gough Street, the existing noise levels from vehicle traffic are below 60 dBA, which is the maximum noise level deemed "satisfactory" for residential uses in the Environmental Protection Element of the *General Plan*. For these segments, an increase equal to or greater than five dBA is considered significant, as Caltrans recognizes such an increase as clearly perceptible. However, existing noise levels along Market Street and Gough Street already exceed 60 dBA and are considered noise impacted in the existing condition. Consequently, for Market Street, a more stringent criterion is warranted. A noise increase of equal to or greater than three dBA is considered significant along Market Street, which Caltrans recognizes as barely perceptible.[46]

As can be seen from **Table 3**, roadside noise increases would be less than three dBA along Market Street and less than five dBA along all other roadways under both the existing plus project condition, as well as under the cumulative plus project condition. Consequently, roadside noise increases along all roadway segments would be ***less than significant***.

[44] Fehr & Peers, *1629 Market Street Transportation Impact Study, Screencheck Draft*, February 2017.
[45] California Department of Transportation, Division of Environmental Analysis, "Technical Noise Supplement," November 2009; pp. 2-48–2-49. Available at http://www.dot.ca.gov/hq/env/noise/pub/tens_complete.pdf.
[46] Caltrans, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013. Available at http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf, accessed October 11, 2016.

TABLE 3 PEAK-HOUR TRAFFIC NOISE LEVELS IN THE VICINITY OF THE PROJECT AREA

Roadway Segment	(A) Existing	(B) Existing Plus Project	(B–A) Difference between Existing Plus Project and Existing	(C) Cumulative No Project (2040)	(D) Cumulative Plus Project (2040)	(D–A) Difference between Cumulative Plus Project and Existing[a]	(D–C) Difference between Cumulative Plus Project and Cumulative No Project[b]
Market Street between 12th Street and Gough Street	68.2	68.2	0.0	68.3	68.5	0.3	0.2
12th Street between South Van Ness Avenue and Market Street	49.3	52.9	3.6	57.8	58.3	9.0	0.5
Brady Street between Otis Street and Stevenson Street	50.3	53.6	3.3	50.3	54.9	4.6	4.6
Stevenson Street between Gough Street and Brady Street	47.0	51.0	4.0	47.0	51.2	4.2	4.2
Gough Street between Otis Street and Stevenson Street	62.5	62.5	0.0	63.7	63.9	1.4	0.2

SOURCE: ESA, 2016.

Road center to receptor distance is 15 meters (approximately 50 feet) for all roadway segments. Noise levels were determined using the Federal Highway Administration (FHWA) Traffic Noise Prediction Model.

The analysis considered the vehicle mix based on the following: cars 97 percent, medium trucks 2 percent, and heavy trucks 1 percent, except for Market Street 95 percent, medium trucks 3 percent, and heavy trucks 2 percent. Traffic speeds for all vehicle classes were set at 25 mph.

a. Considered significant if the incremental increase in noise is greater than 5 dBA for all streets except Market Street where existing levels already exceed 65 dBA. Therefore, a noise increase greater than 3 dBA is considered significant along Market Street.

b. Considered a cumulatively considerable contribution to a significant noise increase if the incremental increase in noise is greater than 3 dBA when the cumulative increase in the preceding column is greater than 5 dBA for all Streets except Market Street where existing levels already exceed 65 dBA. For Market Street, a cumulatively considerable contribution to a significant noise increase would occur of if the incremental increase in noise is greater than 1.5 dBA when the cumulative increase in the preceding column is greater than 3 dBA.

The proposed project would include retail/restaurant, residential, office, and open space uses. In addition to traffic-related noise generated by these uses, stationary equipment in buildings are also noise sources. Specifically, as discussed above, mechanical equipment such as heating and ventilation systems produce operational noise. Mechanical equipment would be subject to Section 2909 of the Noise Ordinance (Article 29 of the Police Code). This section establishes a noise limit from mechanical sources such as building equipment, specified as a certain noise level in excess of the ambient noise level at the property line of off-site receptors. For noise generated by residential uses, the limit is five dBA in excess of ambient; this limitation would apply to the proposed project. In addition, Section 2909(d) of the Noise Ordinance specifies a separate fixed-source noise limit for residential interiors of 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.

The mechanical, electrical, and plumbing equipment design for the proposed project is not yet complete. It is expected that the proposed project would have standard interior HVAC equipment with some rooftop, penthouse, or basement equipment and mechanical louvers, visual screen walls, and parapet barriers to help reduce noise transmission to the adjacent land uses. While it is anticipated that these standard noise reduction

elements would be adequate to meet the Section 2909(d) fixed source noise requirements of 45 dBA at night and 55 dBA during the day and evening hours for the adjacent residential properties, a mitigation measure is identified to ensure that building materials are sufficiently rated to attain interior noise requirements once the location and specifications of the ventilation or air-conditioning system are available.

> **Mitigation Measure M-NO-1 – Acoustical Assessment of Mechanical, Electrical, and Plumbing (MEP) Equipment.** Prior to issuance of the Architectural and MEP Addendum, the project sponsor shall submit an Acoustical Assessment that analyzes the potential noise impact to adjacent receptors from mechanical equipment and identifies acoustical treatments such as enclosures, acoustical louvers or baffling, as necessary, to achieve a 45 dB interior performance standard resulting from noise generated by mechanical, electrical, and plumbing equipment systems when locations and specifications of such systems are identified in the engineering plans.

Compliance with Section 2909 of the Noise Ordinance serves to minimize stationary source noise from building operations. Given that the proposed project's vehicle trips would not result in a significant noise impact, and that any proposed mechanical equipment would comply with **Mitigation Measure M-NO-1**, the proposed project would not result in exposure of persons to or generation of noise levels in excess of standards established in the general plan or noise ordinance, nor would it result in a substantial permanent increase in ambient noise levels. Thus, the noise impact related to project operations would be ***less than significant with mitigation***.

Impact NO-2: During construction, the proposed project could result in a substantial temporary or periodic increase in ambient noise levels and vibration in the project vicinity above levels existing without the proposed project. (Less than Significant with Mitigation)

Construction Noise and Vibration from Proposed Project

Construction of the entire project would take place in two phases and is estimated to require a total of 44 months. Phase 1 would require 22 months, beginning in March 2018, while Phase 2 would begin in January 2020 and require 22 months for completion. Construction of both phases would involve demolition and site preparation, grading and excavation, followed by foundation and below-grade construction, building construction, paving and architectural coatings, and interior finishing.

Demolition, excavation, and building construction would cause a temporary increase in noise levels within the project vicinity. Construction equipment would generate noise that could be considered an annoyance by occupants of nearby properties. Construction noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between noise source and affected receptor, and the presence (or absence) of barriers. **Table 4, Typical Noise Levels from Construction Equipment**, p. 35, shows the noise levels associated with different construction equipment. Impacts would generally be limited to demolition and the periods during which new foundations and exterior structural and façade elements would be constructed. Interior construction noise would be substantially reduced by exterior walls. However, there would be times when noise could interfere with indoor activities in nearby residences and other businesses near the project site.

TABLE 4 TYPICAL NOISE LEVELS FROM CONSTRUCTION EQUIPMENT

Construction Equipment	Noise Level (dBA, L_{max} at 50 feet)
Dump Truck	76
Air Compressor	78
Street Sweeper	82
Excavator	81
Scraper	84
Jackhammer (Impact)	85
Mounted Impact Hammer (Hoe Ram) (Impact)	90
Loader	79
Tractor/Dozer	82
Auger Drill Rig	84
Crane, Mobile	81
Forklift[a]	84
Concrete saw	90
Grout-mixing Plant (pump)	81
Gradall	83
Concrete Mixer	79

SOURCE: Federal Highway Administration, *Roadway Construction Noise Model User Guide*, 2006.
NOTES:
a. From *Ventura County Construction Noise Threshold Criteria and Control Plan*, 2010.

As noted above, construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the Police Code). The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA at a distance of 100 feet or 86 dBA at a distance of 50 feet from the source. Impact tools (e.g., jackhammers, hoe rams, impact wrenches) must have manufacturer-recommended and City-approved mufflers for both intake and exhaust. Section 2908 of the Ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m., if noise would exceed the ambient noise level by five dBA at the project property line, unless a special permit is authorized by the Director Public Works or the Director of Building Inspection. The proposed project would be required to comply with regulations set forth in the Noise Ordinance.

The San Francisco Noise Ordinance does not identify quantitative noise limit standards for impact equipment or combined noise impacts from simultaneous operation of multiple pieces of equipment. Therefore, the significance of impact tool (including pile-driving noise) and combined noise increases from simultaneous operation of multiple pieces of construction equipment are evaluated at the closest sensitive receptors based on application of FTA guidelines, as described above (at residential uses, 90 dBA (L_{eq}) during the day and 80 dBA during the night because they are noise-sensitive). To determine whether the project would result in a significant impact with respect to temporary daytime increases in noise levels in the project vicinity above levels existing without the proposed project, the Planning Department considers an increase of 10 dBA over existing noise levels ("Ambient+10 dBA" threshold) due to persistent construction, which generally represents a perceived doubling of loudness, to be a substantial temporary increase in noise levels.

The nearest residential receptors are located less than 50 feet to the west (1651 Market Street) and south (77 Colton Street and 65 Brady Street) of the project site, where existing daytime noise levels have been monitored to be 69 dBA, and 63 dBA, L_{eq}, respectively.[47] These uses would experience temporary and intermittent noise associated with demolition and construction activities as well as from construction trucks traveling to and from the project site. Site excavation would involve removal of approximately 39,700 cubic yards (about 2,500 truckloads), over the course of two months in Phase 1, and approximately 23,700 cubic yards (about 1,500 truckloads) over the course of two months for Phase 2. No impact pile driving is anticipated as part of the proposed project.[48]

Estimated construction noise levels generated by non-impact equipment of the proposed project would range from 78 to 89 dB L_{eq} at the nearest residential uses. While enforcement of the Noise Ordinance would limit noise generated by standard pieces of construction equipment to 80 dBA at 100 feet, localized increase in noise would be more than 10 dBA above existing ambient, which is an increase perceived as a doubling of loudness.[49] Consequently, while the temporary construction noise effects would not exceed the standards in the Noise Ordinance for single pieces of equipment, a combination of equipment noise during the more intensive construction activities such as excavation could result in a substantial temporary increase in noise levels; a significant impact warranting implementation of **Mitigation Measure M-NO-2, Construction Noise Reduction**, to minimize potential nuisance noise impacts from construction. The worst-case construction-related noise increase would be 26 dBA (89 dBA – 63 dBA), which would only occur for those periods of time when the noisiest equipment is operating at the property boundary. Standard mitigation measures to reduce construction-related noise levels have been demonstrated to reduce equipment noise by five to 10 dBA.[50] Moveable sound barrier curtains can provide 15 dBA of sound attenuation.[51] Static sound barrier curtains can provide sound transmission loss of 16 to 40 dBA, depending on the frequency of the noise source.[52] With these measures, a reduction of 16 dBA is attainable and construction noise impacts would be reduced to a ***less-than-significant*** level.

> **Mitigation Measure M-NO-2 – Construction Noise Reduction.** Incorporate the following practices into the construction contract agreement documents to be implemented by the construction contractor:
>
> - Conduct noise monitoring at the beginning of major construction phases (e.g., demolition, excavation) to determine the need and the effectiveness of noise-attenuation measures. Measures needed to reduce activity that exceeds 86 dB at a distance of 50 feet or 73 dBA L_{eq} at the property line shall include plywood barriers, suspended construction blankets, or other screening devices to break line of sight to noise-sensitive receivers;
> - 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;
> - Notify the City and neighbors in advance of the schedule for each major phase of construction and expected loud activities;

[47] Charles M. Salter Associates, *1629 Market Street Project Environmental Noise Assessment*, October 12, 2016.
[48] Langan Treadwell Rollo, *Preliminary Geotechnical Investigation, 1629 Market Street*, July 5, 2016.
[49] Caltrans, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013, p. 2-44.
[50] Bolt, Baranek, and Newman, *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances*, December 31, 1971.
[51] Industrial Noise Control (INC), Product Specification Sheet, INC Portable Noise Screen, 2014.
[52] Environmental Noise Control (ENC), Product Specification Sheet, ENC STC-32 Sound Control Panel System, 2014.

- Construction activity shall be limited to the hours of 7:00 a.m. to 8:00 p.m. per San Francisco Police Code Article 29. Construction outside of these hours shall be approved through a development permit based on a site-specific construction noise mitigation plan and a finding by the Director of Building Inspection that the construction noise mitigation plan is adequate to prevent noise disturbance of affected residential uses;
- When feasible, select "quiet" construction methods and equipment (e.g., improved mufflers, use of intake silencers, engine enclosures);
- Locate stationary equipment, material stockpiles, and vehicle staging areas as far as practicable from all identified sensitive receptors. Avoid placing stationary noise generating equipment (e.g., generators, compressors) within noise-sensitive buffer areas (measured at 20 feet) from immediately adjacent neighbors;
- All construction equipment is required to be in good working order and mufflers are required to be inspected proper functionality;
- Prohibit unnecessary idling of equipment and engines;
- During Phase 2 of construction, stationary equipment should be located internal to the project to the extent feasible to allow for the shielding provided by the Phase 1 buildings;
- Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used where feasible; this could achieve a reduction of five dBA. Quieter procedures, such as use of drills rather than impact tools, shall be used where feasible; and
- The project sponsor shall designate a point of contact to respond to noise complaints. The point of contact must have the authority to modify construction noise-generating activities to ensure compliance with the measures above and with the San Francisco Noise Ordinance.

Construction could also generate vibration that could potentially rise to the level of annoyance. Caltrans, in its *Transportation and Construction Vibration Guidance Manual*, does not provide standards for vibration annoyance potential. However, this manual provides guidelines for assessing construction vibration annoyance in peak particle value (PPV) for transient sources, e.g., a single isolated vibration event, with a PPV of 0.035 inches per second (in/sec) being barely perceptible, a PPV of 0.24 in/sec being distinctly perceptible, a PPV of 0.9 in/sec being strongly perceptible.[53] As discussed in connection with vibration impacts in Section IV.A, *Historic Architectural Resources*, of the EIR, heavy equipment used in construction could generate a vibration level of up to 0.089 in/sec PPV at a distance of 25 feet, for the largest typical construction equipment such as a large bulldozer, which is well below the threshold for being distinctly perceptible (PPV of 0.24 in/sec). Because the nearest off-site sensitive receptors are a minimum of 33 feet from the project site, vibration levels at these off-site locations would be lower. Thus, with respect to human annoyance, the construction-related groundborne vibration effects on the closest off-site sensitive receptors would be ***less than significant***, and no mitigation is required.

[53] Caltrans, *Transportation and Construction Vibration Guidance Manual*, February 2013; Table 6, p. 22. Available at http://www.dot.ca.gov/hq/env/noise/pub/tcvgm_sep13_verb.pdf, accessed May 4, 2017.

Construction vibration could be greater at the existing Civic Center Hotel, which is located on the project site and would remain occupied during construction of Phase 1 of the proposed project. In particular, the new UA Local 38 building would be constructed adjacent to the Civic Center Hotel during Phase 1. Vibration levels could potentially result in a significant effect on residents of this building. However, in order to protect the historic Civic Center Hotel from vibration damage during construction, **Mitigation Measure M-CR-1c, Protect On-Site Historical Resources from Construction Activities**, and **Mitigation Measure M-CR-1d, Vibration Monitoring Program for On-Site Historical Resources** (see Section IV.A, *Historic Architectural Resources*, of the EIR), would require the project sponsor to use feasible means to avoid damage to the Civic Center Hotel and to monitor the Civic Center Hotel for vibration damage. Inasmuch as the threshold for vibration damage to masonry structures is as low as 0.2 in/sec PPV, it can reasonably be expected that, while vibration may at times be distinctly perceptible to residents of the Civic Center Hotel, the monitoring program is likely to avoid distinctly perceptible vibration (i.e., vibration levels would remain below 0.24 in/sec. PPV). Accordingly, with implementation of **Mitigation Measures M-CR-1c** and **M-CR-1d**, vibration impacts resulting from project construction would be ***less than significant with mitigation***.

Impact C-NO-1: The proposed project would make a considerable contribution to cumulative significant noise impacts. (Less than Significant with Mitigation)

Construction activities associated with other projects in the vicinity of the project site would occur on a temporary and intermittent basis, similar to the proposed project. All projects would be required to comply with the Noise Ordinance requirements. Project construction noise would be temporary, intermittent and localized, limited to a few hundred feet from the project site. Construction noise would attenuate due to distance and the presence of barriers, such as buildings and structures. Other than renovation projects, there are several development projects planned in the project vicinity that are close enough (within 500 feet) to have the potential to result in cumulative construction noise contributions, depending on approval and scheduling, including One Oak Street (formerly 1500–1540 Market Street), 1546–1564 Market Street, 22 & 24 Franklin Street, 1700 Market Street, 1699 Market Street, 30 Otis Street, 1601 Mission Street (Tower Car Wash), 1563 Mission Street, 10 South Van Ness (Honda Site), and 1500 Mission Street (Goodwill site). Most of these projects are separated from the proposed project by multiple buildings that would provide shielding of construction noise and would be unlikely to noticeably combine with project construction noise at the nearest receptor locations, even if they were to be constructed simultaneously. However, 10 South Van Ness Avenue, One Oak Street, and 1546–1564 Market Street would not have such intervening structures and as such, construction noise effects associated with the proposed project could potentially combine with those associated with this cumulative project located near the project site. Both the proposed project and the 10 South Van Ness Avenue project have residential uses directly across Market Street (at and near the location of the proposed One Oak Street and 1546–1564 Market Street projects) that would have a direct line-of-sight to these two projects' construction activities, should they occur simultaneously. Therefore, cumulative construction-related noise impacts could be significant. Implementation of **Mitigation Measure M-NO-2, Construction Noise Reduction**, would reduce the proposed project's contribution to cumulative construction noise impacts to a less-than-cumulatively considerable level by establishing a noise reduction performance standard.

Localized traffic noise would increase in conjunction with foreseeable residential and commercial growth in the project vicinity. As can be seen from the last column in **Table 3**, cumulative roadside noise increases would be less than three dBA along Market Street and less than five dBA along all other roadways under the cumulative

plus project condition. Consequently, cumulative roadside noise increases along all roadway segments would be less than significant.

Furthermore, **Mitigation Measure M-NO-1, Acoustical Assessment of Mechanical, Electrical, and Plumbing Equipment**, would ensure that the proposed project's mechanical equipment would comply with Police Code Section 2909, which establishes a not-to-exceed noise standard for fixed sources of noise of eight dBA above the ambient level for noise sources emanating from commercial properties and five dBA above the ambient level for noise sources emanating from residential properties, and would therefore not be expected to contribute to any cumulative increases in ambient noise levels.

In light of the above, the proposed project would result in ***less-than-significant with mitigation*** cumulative impacts related to noise.

Topic:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
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?	☐	☐	☒	☐	☐

Setting

Overview

The Bay Area Air Quality Management District (BAAQMD) is the regional agency with jurisdiction over the nine-county San Francisco Bay Area Air Basin (SFBAAB), which includes San Francisco, Alameda, Contra Costa, Marin, San Mateo, Santa Clara, and Napa Counties and portions of Sonoma and Solano Counties. The BAAQMD is responsible for attaining and maintaining air quality in the SFBAAB within federal and state air quality standards, as established by the federal Clean Air Act (CAA) and the California Clean Air Act (CCAA), respectively. Specifically, the BAAQMD has the responsibility to monitor ambient air pollutant levels throughout the SFBAAB and to develop and implement strategies to attain the applicable federal and state standards. The CAA and the CCAA require plans to be developed for areas that do not meet air quality standards, generally. The most recent air quality plan, the 2010 Clean Air Plan (CAP), was adopted by the BAAQMD on September 15, 2010. The (CAP) updates the Bay Area 2005 Ozone Strategy in accordance with the requirements of the CCAA to implement all feasible measures to reduce ozone; provide a control strategy to

reduce ozone, particulate matter, air toxics, and greenhouse gases in a single, integrated plan; and establish emission control measures to be adopted or implemented. The (CAP) contains the following primary goals:

- Attain air quality standards;
- Reduce population exposure and protect public health in the San Francisco Bay Area; and
- Reduce greenhouse gas emissions and protect the climate.

The CAP represents the most current applicable air quality plan for the SFBAAB. Consistency with this plan is the basis for determining whether the proposed project would conflict with or obstruct implementation of air quality plans. The CAP is currently being updated with a Final Draft circulated in January 2017 and consideration by BAAQMD in spring of 2017.

Criteria Air Pollutants

In accordance with the state and federal CAAs, air pollutant standards are identified for the following six criteria air pollutants: ozone, carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead. These air pollutants are termed criteria air pollutants because they are regulated by developing specific public health- and welfare-based criteria as the basis for setting permissible levels. In general, the SFBAAB experiences low concentrations of most pollutants when compared to federal or state standards. The SFBAAB is designated as either in attainment or unclassified for most criteria pollutants with the exception of ozone, $PM_{2.5}$, and PM_{10}, for which these pollutants are designated as non-attainment for either the state or federal standards.[54] By its very nature, regional air pollution is largely a cumulative impact, in that no single project is sufficient in size to, by itself, result in non-attainment of air quality standards. Instead, a project's individual emissions contribute to existing cumulative air quality impacts. If a project's contribution to cumulative air quality impacts is considerable, then the project's impact on air quality would be considered significant.[55]

Land use projects may contribute to regional criteria air pollutants during the construction and operational phases of a project. **Table 5, Criteria Air Pollutant Significance Thresholds**, p. 41, identifies air quality significance thresholds followed by a discussion of each threshold. Projects that would result in criteria air pollutant emissions below these significance thresholds would not violate an air quality standard, contribute substantially to an air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants within the SFBAAB.

The thresholds of significance for criteria air pollutants are based on substantial evidence presented in Appendix D of the 2011 BAAQMD CEQA Air Quality Guidelines and BAAQMD's 2009 Revised Draft Options and Justification Report concerning CEQA thresholds.[56]

[54] "Attainment" status refers to those regions that are meeting federal and/or state standards for a specified criteria pollutant. "Non-attainment" refers to regions that do not meet federal and/or state standards for a specified criteria pollutant. "Unclassified" refers to regions where there is not enough data to determine the region's attainment status for a specified criteria air pollutant.
[55] Bay Area Air Quality Management District (BAAQMD), *California Environmental Quality Act Air Quality Guidelines,* May 2011, p. 2-1.
[56] BAAQMD, CEQA Air Quality Guidelines, May 2011, p. 2-2; BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance,* p. 17, October 2009.[56] BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance,* October 2009, p. 17.

TABLE 5 CRITERIA AIR POLLUTANT SIGNIFICANCE THRESHOLDS

	Construction Thresholds	Operational Thresholds	
Pollutant	Average Daily Emissions (lbs./day)	Average Daily Emissions (lbs./day)	Maximum Annual Emissions (tons/year)
ROG	54	54	10
NO_X	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable	

Ozone Precursors. As discussed previously, the SFBAAB is currently designated as non-attainment for ozone and particulate matter. Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG) and oxides of nitrogen (NO_X). The potential for a project to result in a cumulatively considerable net increase in criteria air pollutants, which may contribute to an existing or projected air quality violation, are based on the state and federal Clean Air Acts emissions limits for stationary sources. To ensure that new stationary sources do not cause or contribute to a violation of an air quality standard, BAAQMD Regulation 2, Rule 2 requires that any new source that emits criteria air pollutants above a specified emissions limit must offset those emissions. For ozone precursors ROG and NO_X, the offset emissions level is an annual average of 10 tons per year (or 54 pounds (lbs.) per day).[57] These levels represent emissions below which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants.

Although this regulation applies to new or modified stationary sources, land use development projects result in ROG and NO_X emissions as a result of increases in vehicle trips, architectural coating and construction activities. Therefore, the above thresholds can be applied to the construction and operational phases of land use projects and those projects that result in emissions below these thresholds, would not be considered to contribute to an existing or projected air quality violation or result in a considerable net increase in ROG and NO_X emissions. Due to the temporary nature of construction activities, only the average daily thresholds are applicable to construction phase emissions.

Particulate Matter (PM_{10} and $PM_{2.5}$).[58] The BAAQMD has not established an offset limit for $PM_{2.5}$. However, the emissions limit in the federal NSR for stationary sources in nonattainment areas is an appropriate significance threshold. For PM_{10} and $PM_{2.5}$, the emissions limit under NSR is 15 tons per year (82 lbs. per day) and 10 tons per year (54 lbs. per day), respectively. These emissions limits represent levels below which a source is not expected to have an impact on air quality.[59] Similar to ozone precursor thresholds identified above, land use development projects typically result in particulate matter emissions as a result of increases in vehicle trips, space heating and natural gas combustion, landscape maintenance, and construction activities. Therefore, the

[57] BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance,* October 2009, p. 17.
[58] PM_{10} is often termed "coarse" particulate matter and is made of particulates that are 10 microns in diameter or smaller. $PM_{2.5}$, termed "fine" particulate matter, is composed of particles that are 2.5 microns or less in diameter.
[59] BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance,* October 2009, p. 16.

above thresholds can be applied to the construction and operational phases of a land use project. Again, because construction activities are temporary in nature, only the average daily thresholds are applicable to construction-phase emissions.

Fugitive Dust. Fugitive dust emissions are typically generated during construction phases. Studies have shown that the application of best management practices (BMPs) at construction sites significantly control fugitive dust and individual measures have been shown to reduce fugitive dust by anywhere from 30 to 90 percent.[60,61] The BAAQMD has identified a number of BMPs to control fugitive dust emissions from construction activities.[62] The City's Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) requires a number of measures to control fugitive dust and the BMPs employed in compliance with the City's Construction Dust Control Ordinance is an effective strategy for controlling construction-related fugitive dust.

Other Criteria Pollutants. Regional concentrations of CO in the Bay Area have not exceeded the state standards in the past 11 years and SO_2 concentrations have never exceeded the standards. The primary source of CO emissions from development projects is vehicle traffic. Construction-related SO_2 emissions represent a negligible portion of the total basin-wide emissions and construction-related CO emissions represent less than five percent of the Bay Area total basin-wide CO emissions. As discussed previously, the Bay Area is in attainment for both CO and SO_2. Furthermore, the BAAQMD has demonstrated, based on modeling, that in order to exceed the California ambient air quality standard of 9.0 ppm (eight-hour average) or 20.0 ppm (one-hour average) for CO, project traffic in addition to existing traffic would need to exceed 44,000 vehicles per hour at affected intersections (or 24,000 vehicles per hour where vertical and/or horizontal mixing is limited). Therefore, given the Bay Area's attainment status and the limited CO and SO_2 emissions that could result from a development projects, development projects would not result in a cumulatively considerable net increase in CO or SO_2, and quantitative analysis is not required.

Local Health Risks and Hazards

In addition to criteria air pollutants, individual projects may emit toxic air contaminants (TACs). TACs collectively refer to a diverse group of air pollutants that are capable of causing chronic (i.e., of long-duration) and acute (i.e., severe but short-term) adverse effects to human health, including carcinogenic effects. Human health effects of TACs include birth defects, neurological damage, cancer, and mortality. There are hundreds of different types of TACs with varying degrees of toxicity. Individual TACs vary greatly in the health risk they present; at a given level of exposure, one TAC may pose a hazard that is many times greater than another.

Unlike criteria air pollutants, TACs do not have ambient air quality standards but are regulated by the BAAQMD using a risk-based approach to determine which sources and pollutants to control as well as the degree of control. A health risk assessment is an analysis in which human health exposure to toxic substances

[60] Western Regional Air Partnership, *WRAP Fugitive Dust Handbook,* September 7, 2006. Available at http://www.wrapair.org/forums/dejf/fdh/content/FDHandbook_Rev_06.pdf, accessed February 16, 2012.
[61] BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance,* October 2009, p. 27.
[62] BAAQMD, *CEQA Air Quality Guidelines,* May 2011.

is estimated, and considered together with information regarding the toxic potency of the substances, to provide quantitative estimates of health risks.[63]

Air pollution does not affect every individual in the population in the same way, and some groups are more sensitive to adverse health effects than others. Land uses such as residences, schools, children's day care centers, hospitals, and nursing and convalescent homes are considered to be the most sensitive to poor air quality because the population groups associated with these uses have increased susceptibility to respiratory distress or, as in the case of residential receptors, their exposure time is greater than that for other land uses. Therefore, these groups are referred to as sensitive receptors. Exposure assessment guidance typically assumes that residences would be exposed to air pollution 24 hours per day, 350 days per year, for 70 years. Therefore, assessments of air pollutant exposure to residents typically result in the greatest adverse health outcomes of all population groups.

Exposures to fine particulate matter ($PM_{2.5}$) are strongly associated with mortality, respiratory diseases, and lung development in children, and other endpoints such as hospitalization for cardiopulmonary disease.[64] In addition to $PM_{2.5}$, diesel particulate matter (DPM) is also of concern. The California Air Resources Board (ARB) identified DPM as a TAC in 1998, primarily based on evidence demonstrating cancer effects in humans.[65] The estimated cancer risk from exposure to diesel exhaust is much higher than the risk associated with any other TAC routinely measured in the region.

In an effort to identify areas of San Francisco most adversely affected by sources of TACs, San Francisco partnered with the BAAQMD to conduct a citywide health risk assessment based on an inventory and assessment of air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed "Air Pollutant Exposure Zones," were identified based on health-protective criteria that consider estimated cancer risk, exposures to fine particulate matter, proximity to freeways, and locations with particularly vulnerable populations. The project site is located within an Air Pollutant Exposure Zone (APEZ). Each of the APEZ criteria is discussed below.

Excess Cancer Risk. The above 100 per one million persons (100 excess cancer risk) criteria is based on United States Environmental Protection Agency (USEPA) guidance for conducting air toxic analyses and making risk management decisions at the facility and community-scale level.[66] As described by the BAAQMD, the USEPA considers a cancer risk of 100 per million to be within the "acceptable" range of cancer risk. Furthermore, in the 1989 preamble to the benzene National Emissions Standards for Hazardous Air Pollutants (NESHAP) rulemaking,[67] the USEPA states that it "… strives to provide maximum feasible protection against risks to health

[63] In general, a health risk assessment is required if the BAAQMD concludes that projected emissions of a specific air toxic compound from a proposed new or modified source suggest a potential public health risk. The applicant is then subject to a health risk assessment for the source in question. Such an assessment generally evaluates chronic, long-term effects, estimating the increased risk of cancer as a result of exposure to one or more TACs.

[64] SFDPH, *Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review,* May 2008.

[65] California Air Resources Board (ARB), Fact Sheet, "The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines," October 1998.

[66] BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance,* October 2009, p. 67.

[67] 54 Federal Register 38044, September 14, 1989.

from hazardous air pollutants by (1) protecting the greatest number of persons possible to an individual lifetime risk level no higher than approximately one in one million and (2) limiting to no higher than approximately one in ten thousand [100 in one million] the estimated risk that a person living near a plant would have if he or she were exposed to the maximum pollutant concentrations for 70 years." The 100 per one million excess cancer cases is also consistent with the ambient cancer risk in the most pristine portions of the Bay Area based on BAAQMD regional modeling.[68]

Fine Particulate Matter. In April 2011, the USEPA published *Policy Assessment for the Particulate Matter Review of the National Ambient Air Quality Standards*, "Particulate Matter Policy Assessment." In this document, USEPA staff concludes that the then current federal annual $PM_{2.5}$ standard of 15 $\mu g/m^3$ should be revised to a level within the range of 13 to 11 $\mu g/m^3$, with evidence strongly supporting a standard within the range of 12 to 11 $\mu g/m^3$. The APEZ for San Francisco is based on the health protective $PM_{2.5}$ standard of 11 $\mu g/m^3$, as supported by the USEPA's Particulate Matter Policy Assessment, although lowered to 10 $\mu g/m^3$ to account for uncertainty in accurately predicting air pollutant concentrations using emissions modeling programs.

Proximity to Freeways. According to the California Air Resources Board, studies have shown an association between the proximity of sensitive land uses to freeways and a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children. Siting sensitive uses in close proximity to freeways increases both exposure to air pollution and the potential for adverse health effects. As evidence shows that sensitive uses in an area within a 500-foot buffer of any freeway are at an increased health risk from air pollution,[69] lots that are within 500 feet of freeways are included in the Air Pollutant Exposure Zone. The project site is not within 500 feet of a freeway, but it is within 500 feet of U.S. 101 where it is a six land arterial roadway.

Health Vulnerable Locations. Based on the BAAQMD's evaluation of health vulnerability in the Bay Area, those zip codes (94102, 94103, 94105, 94124, and 94130) in the worst quintile of Bay Area Health vulnerability scores as a result of air pollution-related causes were afforded additional protection by lowering the standards for identifying lots in the APEZ to (1) an excess cancer risk greater than 90 per one million persons exposed, and/or (2) $PM_{2.5}$ concentrations in excess of nine $\mu g/m^3$.[70] The project site is located within zip code 94103 and is therefore in a health vulnerable location.

The above citywide health risk modeling was also used as the basis in approving 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, effective December 8, 2014) (Article 38). The purpose of Article 38 is to protect the public health and welfare by establishing the APEZ and imposing an enhanced ventilation requirement for all urban infill sensitive use development within the APEZ. In addition, projects within the APEZ require special consideration to determine whether the project's activities would add a substantial amount of emissions to areas already adversely affected by poor air quality.

[68] BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance,* October 2009, p. 67.
[69] California Air Resources Board, *Air Quality and Land Use Handbook: A Community Health Perspective.* April 2005. Available at http://www.arb.ca.gov/ch/landuse.htm.
[70] San Francisco Planning Department and San Francisco Department of Public Health, *2014 Air Pollutant Exposure Zone Map (Memo and Map),* April 9, 2014. These documents are part of San Francisco Board of Supervisors File No. 14806, Ordinance No. 224-14.

Construction Air Quality Impacts

Project-related air quality impacts fall into two categories: short-term impacts from construction and long-term impacts from project operation. The following addresses construction-related air quality impacts resulting from the proposed project.

Impact AQ-1: The proposed project's construction activities would generate fugitive dust and criteria air pollutants, but would not violate an air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants. (Less than Significant)

Construction activities (short-term) typically result in emissions of ozone precursors and PM in the form of dust (fugitive dust) and exhaust (e.g., vehicle tailpipe emissions). Emissions of ozone precursors and PM are primarily a result of the combustion of fuel from on-road and off-road vehicles. However, ROG are also emitted from activities that involve painting, other types of architectural coatings, or asphalt paving. The proposed project would include construction of approximately 498,100 square feet of residential use that would contain up to 584 residential units; approximately 13,000 square feet of ground-floor retail/restaurant space along Market, 12th, and Brady Streets; 32,800 square feet of publicly-accessible and common open space; and 27,300 square feet of office and assembly use.

Construction of the entire project would take place in two sequential phases and is estimated to require a total of 44 months. Phase 1 would require 22 months, and is anticipated to begin in March 2018, while Phase 2 would begin in January 2020 and require 22 months for completion. Construction of both phases would involve demolition and site preparation, grading and excavation, followed by foundation and below-grade construction, building construction, paving and architectural coatings, and interior finishing.

Fugitive Dust

Project-related demolition, excavation, grading, and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. Although there are federal standards for air pollutants and implementation of state and regional air quality control plans, air pollutants continue to have impacts on human health throughout the country. California has found that particulate matter exposure can cause health effects at lower levels than national standards. The current health burden of particulate matter demands that, where possible, public agencies take feasible available actions to reduce sources of particulate matter exposure. According to the ARB, reducing particulate matter $PM_{2.5}$ concentrations to state and federal standards of 12 $\mu g/m^3$ in the San Francisco Bay Area would prevent between 200 and 1,300 premature deaths.[71]

Dust can be an irritant causing watering eyes or irritation to the lungs, nose, and throat. Demolition, excavation, grading, and other construction activities can cause wind-blown dust that adds particulate matter to the local atmosphere. Depending on exposure, adverse health effects can occur due to this particulate matter, in general, and also due to specific contaminants such as lead or asbestos that may be constituents of soil.

In response, the Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes generally referred hereto as the Construction Dust Control Ordinance (Ordinance 176-08, effective

[71] ARB, *Methodology for Estimating Premature Deaths Associated with Long-term Exposure to Fine Airborne Particulate Matter in California*, Staff Report, Table 4c, October 24, 2008.

July 30, 2008) with the intent of reducing the quantity of dust generated during site preparation, demolition and construction work in order to protect the health of the general public and of onsite workers, minimize public nuisance complaints, and to avoid orders to stop work by the Department of Building Inspection (DBI).

The Ordinance requires that all site preparation work, demolition, or other construction activities within San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures whether or not the activity requires a permit from DBI. The Director of DBI may waive this requirement for activities on sites less than one half-acre that are unlikely to result in any visible wind-blown dust.

In compliance with the Construction Dust Control Ordinance, the project sponsor and the contractor responsible for construction activities at the project site would be required to use the following practices to control construction dust on the site or other practices that result in equivalent dust control that are acceptable to the Director. Dust suppression activities may include watering all active construction areas sufficiently to prevent dust from becoming airborne; increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. During excavation and dirt-moving activities, contractors shall wet sweep or vacuum the streets, sidewalks, paths, and intersections where work is in progress at the end of the workday. Inactive stockpiles (where no disturbance occurs for more than seven days) greater than 10 cubic yards or 500 square feet of excavated material, backfill material, import material, gravel, sand, road base, and soil shall be covered with a 10 mil (0.01 inch) polyethylene plastic (or equivalent) tarp, braced down, or use other equivalent soil stabilization techniques. Ordinance 175-91 restricts the use of potable water for soil compaction and dust control activities undertaken in conjunction with any construction or demolition project occurring within the boundaries of San Francisco, unless permission is obtained from the San Francisco Public Utilities Commission (SFPUC). Non-potable water must be used for soil compaction and dust control activities during project construction and demolition. The SFPUC operates a recycled water truck-fill station at the Southeast Water Pollution Control Plant that provides recycled water for these activities at no charge.

For projects over one half-acre, such as the proposed project, the Dust Control Ordinance requires that the project sponsor submit a Dust Control Plan for approval by the San Francisco Department of Public Health. DBI will not issue a building permit without written notification from the Director of Public Health that the applicant has a site-specific Dust Control Plan, unless the Director waives the requirement. Interior-only tenant improvement projects that are over 0.5 acre in size that will not produce exterior visible dust are exempt from the site-specific Dust Control Plan requirement.

The site-specific Dust Control Plan would require the project sponsor to submit of a map to the Director of Public Health showing all sensitive receptors within 1,000 feet of the site; wet down areas of soil at least three times per day; provide an analysis of wind direction and install upwind and downwind particulate dust monitors; record particulate monitoring results; hire an independent, third-party to conduct inspections and keep a record of those inspections; establish shut-down conditions based on wind, soil migration, etc.; establish a hotline for surrounding community members who may be potentially affected by project-related dust; limit the area subject to construction activities at any one time; install dust curtains and windbreaks on the property lines, as necessary; limit the amount of soil in hauling trucks to the size of the truck bed and securing with a tarpaulin; enforce a 15 mph speed limit for vehicles entering and exiting construction areas; sweep affected streets with water sweepers at the end of the day; install and utilize wheel washers to clean truck tires; terminate construction activities when winds exceed 25 miles per hour; apply soil stabilizers to inactive areas; and sweep

off adjacent streets to reduce particulate emissions. The project sponsor would be required to designate an individual to monitor compliance with these dust control requirements. Compliance with the regulations and procedures set forth by the San Francisco Dust Control Ordinance would ensure that potential dust-related air quality impacts would be reduced to a ***less-than-significant*** level.

Criteria Air Pollutants

As discussed above, construction activities would result in emissions of criteria air pollutants from the use of off- and on-road vehicles and equipment. To assist lead agencies in determining whether short-term construction-related air pollutant emissions require further analysis as to whether the project may exceed the criteria air pollutant significance thresholds shown in **Table 5, Criteria Air Pollutant Significance Thresholds**, p. 41, the BAAQMD, in its *CEQA Air Quality Guidelines* (May 2011), developed screening criteria. If a proposed project meets the screening criteria, then construction of the project would result in less-than-significant criteria air pollutant impacts. A project that exceeds the screening criteria may require a detailed air quality assessment to determine whether criteria air pollutant emissions would exceed significance thresholds. The *CEQA Air Quality Guidelines* note that the screening levels are generally representative of new development on greenfield sites without any form of mitigation measures taken into consideration.[72] In addition, the screening criteria do not account for project design features, attributes, or local development requirements that could also result in lower emissions.

The proposed project includes construction of approximately 498,100 square feet of residential use; approximately 13,000 square feet of ground-floor retail/restaurant space; 32,800 square feet of publicly-accessible and common open space; and 27,300 square feet of office and assembly use. The size of proposed construction activities exceeds the criteria air pollutant screening criteria; therefore, a quantitative analysis was conducted. Construction-related criteria air pollutants generated by the proposed project were quantified using the California Emissions Estimator Model (CalEEMod, version 2016.3.1) and provided within an Air Quality Technical Report.[73]

The model was developed, including default data (e.g., emission factors, meteorology, etc.), in collaboration with California air districts' staff. The project applicant provided project-specific off-road equipment assumptions and construction phasing assumptions. Default assumptions were used where project-specific information was unknown. The model run analyzed both phases of proposed construction over a 44-month period. Emissions were converted from tons/year to lbs./day using the estimated construction duration of 484 working days during construction of Phase 1 and 481 days during construction of Phase 2. As shown in **Table 6, Daily Project Construction Emissions During Phase 1**, p. 48, unmitigated project construction emissions during Phase 1 would be below the threshold of significance for ROG, NO_x, $PM_{2.5}$, and PM_{10}.

During Phase 2 construction, Phase 1 development would be complete and potentially fully occupied and operational. Consequently, **Table 7, Daily Project Emissions During Phase 2**, p. 48, presents the combination of Phase 1 operational emissions (discussed in detail in the next subsection) with Phase 2 construction emissions and compares them to the daily significance thresholds for ROG, NO_x, $PM_{2.5}$, and PM_{10}. As can be seen in **Table 7**, the combination of Phase 1 operational emissions with Phase 2 construction emissions would also be

[72] A greenfield site refers to agricultural or forest land or an undeveloped site earmarked for commercial, residential, or industrial projects.
[73] Ramboll Environ, *Air Quality Technical Report for1629 Market Street Project*, February 2, 2017.

below the threshold of significance for ROG, NO_X, $PM_{2.5}$, and PM_{10}. Therefore, potential criteria air pollutant impacts during project construction would be ***less than significant***.

TABLE 6 DAILY PROJECT CONSTRUCTION EMISSIONS DURING PHASE 1

	Pollutant Emissions (Average Pounds per Day)			
	ROG	**NO_X**	**Exhaust PM_{10}**	**Exhaust $PM_{2.5}$**
Unmitigated Project Emissions	16	13	0.35	0.33
Significance Threshold	54.0	54.0	82.0	54.0

SOURCE: BAAQMD, 2011; Ramboll Environ, 2017.
NOTE:
Emissions over threshold levels are in **bold**.

TABLE 7 DAILY PROJECT EMISSIONS DURING PHASE 2

	Pollutant Emissions (Average Pounds per Day)			
	ROG	**NO_X**	**Exhaust PM_{10}**	**Exhaust $PM_{2.5}$**
Phase 1 Operational Emissions	10	6.8	4.2	1.3
Unmitigated Phase 2 Construction Emissions	7.2	5.6	0.12	0.11
Total Emissions During Phase 2 Construction	17.2	12.4	4.3	1.4
Significance Threshold	54.0	54.0	82.0	54.0

SOURCE: BAAQMD, 2011; Ramboll Environ, 2017.
NOTE:
Emissions over threshold levels are in **bold**.

Operational Air Quality Impacts

Land use projects typically result in emissions of criteria air pollutants and toxic air contaminants primarily from an increase in motor vehicle trips. However, land use projects may also result in criteria air pollutants and toxic air contaminants from combustion of natural gas, landscape maintenance, use of consumer products, and architectural coating. The following addresses criteria air pollutant impacts resulting from operation of the proposed project. Impacts from both construction-related and operational toxic air contaminant emissions are assessed in the following Impact AQ-4.

Impact AQ-2: During project operations, the proposed project would result in emissions of criteria air pollutants, but not at levels that 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. (Less than Significant)

As discussed above in Impact AQ-1, the BAAQMD, in its *CEQA Air Quality Guidelines* (May 2011), has developed screening criteria to determine whether a project requires an analysis of project-generated criteria air pollutants. If all the screening criteria are met by a proposed project, then the lead agency or applicant does not need to perform a detailed air quality assessment.

The proposed project includes construction of approximately 498,100 square feet of residential use; approximately 13,000 square feet of ground-floor retail/restaurant space; 27,300 square feet of office and

assembly use; and 32,800 square feet of publicly-accessible and common open space use. Therefore, the proposed project would generate criteria pollutant emissions associated with vehicle traffic (mobile sources), on-site area sources (i.e., natural gas combustion for space and water heating, and combustion of other fuels by building and grounds maintenance equipment), and energy usage. Operational-related criteria air pollutants generated by the proposed project were also quantified using CalEEMod and provided within an Air Quality Technical Report. The modeling used the vehicle trip generation estimated in the Transportation Impact Study.[74] Default assumptions were used where project-specific information was unknown.

The daily and annual emissions associated with operation of the proposed project are shown in **Table 8, Summary of Operational Criteria Air Pollutant Emissions**, p. 49. **Table 8** also includes the thresholds of significance the City utilizes.

TABLE 8 SUMMARY OF OPERATIONAL CRITERIA AIR POLLUTANT EMISSIONS

	ROG	NO_X	PM_{10}	$PM_{2.5}$
Project Average Daily Emissions (lbs./day)	14	9.4	6.5	2.0
Significance Threshold (lbs./day)	54	54	82	54
Project Maximum Annual Emissions (tpy)	2.6	1.7	1.2	0.37
Significance Threshold (tpy)	10.0	10.0	10.0	10.0

SOURCE: BAAQMD, 2011; Ramboll Environ, 2017.
NOTES:
Lbs./day = pounds per day; tpy = tons per year

As shown in **Table 8**, the proposed project would not exceed any of the significance thresholds for criteria air pollutants, and would result in a ***less-than-significant*** impact with respect to criteria air pollutants.

Impact AQ-3: The proposed project would generate toxic air contaminants, including diesel particulate matter, exposing sensitive receptors to substantial air pollutant concentrations. (Less than Significant with Mitigation)

The project site is located within the APEZ, as described above. The project site is immediately surrounded by a mix of 25- to 85-foot-tall commercial, residential, community facility, and light industrial buildings. The nearest sensitive receptors to the project site are residential uses located less than 50 feet to the west (1651 Market Street) and south (77 Colton Street and 65 Brady Street) of the project site. Additionally, the proposed project would include construction of approximately 383 residential rental units in Phase 1, the occupants of which would be exposed to the TAC emissions generated by Phase 2 construction activities.

Sources of Toxic Air Contaminants

Site preparation activities, such as demolition, excavation, grading, foundation construction, and other ground-disturbing construction activity, would affect localized air quality during the construction phases of the proposed project. Short-term emissions from construction equipment during these site preparation activities would include directly emitted PM ($PM_{2.5}$ and PM_{10}) and TACs such as DPM. Additionally, the long-term emissions from the proposed project's mobile sources would include PM ($PM_{2.5}$) and TACs, such as DPM and

[74] Fehr & Peers, *Transportation Impact Assessment 1629 Market Street*, February 2017.

some compounds or variations of ROG. The generation of these short- and long-term emissions could expose sensitive receptors to substantial pollutant concentrations of TACs, resulting in an increase in localized health risk. Therefore, a health risk assessment was conducted for the proposed project and the results included in the Air Quality Technical Report. The proposed project would not include a backup emergency generator or any other permitted stationary sources of TACs.

As mentioned above, San Francisco, in partnership with BAAQMD, has modeled and assessed air pollutant impacts from mobile, stationary and area sources within the City and identified areas, the APEZ, based on the significance thresholds for $PM_{2.5}$ and excess cancer risk discussed above. Locating uses within the APEZ that either emit TACs or are considered sensitive to air pollution require special attention. The project site and its environs are located within the APEZ. The threshold of significance used to evaluate health risks from new sources of TACs is based on the potential for the proposed project to substantially affect the geography and severity of the APEZ at sensitive receptor locations.

For projects that could result in sensitive receptor locations, meeting the APEZ criteria that otherwise would not without the project, a proposed project's contribution to $PM_{2.5}$ concentrations above 0.3 $\mu g/m^3$ or an excess cancer risk greater than 10 per million persons exposed would be considered a significant impact. The 0.3 $\mu g/m^3$ $PM_{2.5}$ concentration and the excess cancer risk of 10 per million persons exposed are the levels below which the BAAQMD considers new sources not to make a considerable contribution to cumulative health risks.[75] For locations already meeting the APEZ criteria, such as the sensitive receptors surrounding the project site, a lower significance standard is required to ensure that a proposed project's contribution to existing health risks would not be significant. In these areas, a proposed project's contribution to $PM_{2.5}$ concentrations above 0.2 $\mu g/m^3$ or an excess cancer risk greater than seven per million persons exposed would be considered a significant impact.[76]

The Air Quality Technical Report evaluated total risk from the proposed project construction and operation. The increased cancer risks and $PM_{2.5}$ concentrations from construction and operation of the proposed project for the maximally impacted off-site and on-site site receptors are presented in **Table 9, Lifetime Cancer Risk and PM2.5 Concentration Contributions of the Proposed Project at Off-Site Receptors**, p. 51. As shown in **Table 9**, lifetime cancer risk would exceed the seven per million persons APEZ threshold, primarily as a result of construction-related diesel emissions. Similarly, the proposed project's localized $PM_{2.5}$ concentration contributions would exceed the above 0.2 $\mu g/m^3$ APEZ threshold, also primarily because of construction-related diesel emissions. Consequently, localized health exposure impacts would be significant and mitigation measures are required.

[75] BAAQMD, California Environmental Quality Act Guidelines Update, Proposed Air Quality CEQA Thresholds of Significance. May 3, 2010. Available at http://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CEQA/Proposed_Thresholds_Report_%20May_3_2010_Final.ashx?la=en, accessed January 23, 2017.

[76] 0.2 $\mu g/m^3$ increase in $PM_{2.5}$ would result in a 0.28 percent increase in non-injury mortality or an increase of about twenty-one excess deaths per 1,000,000 population per year from non-injury causes in San Francisco. This information is based on M. Jerrett et al. 2005. Spatial Analysis of Air Pollution and Mortality in Los Angeles. *Epidemiology* 16:727–736. The excess cancer risk has been proportionally reduced to result in a significance criterion of seven per million persons exposed.

TABLE 9 LIFETIME CANCER RISK AND $PM_{2.5}$ CONCENTRATION CONTRIBUTIONS OF THE PROPOSED PROJECT AT OFF-SITE RECEPTORS

	Lifetime Excess Cancer Risk (in one million)		$PM_{2.5}$ Concentration ($\mu g/m^3$)	
Source	**Unmitigated**	**Mitigated**	**Unmitigated**	**Mitigated**
Off-Site Receptor				
Project Construction	22	3.1	0.184	0.071
Operation – Vehicle Traffic	0.8	0.8	0.022	0.022
Cumulative Total	***23***	***3.9***	***0.21***	***0.093***
Criteria within APEZ	7	7	0.20	0.20
Significant?	Yes	No	Yes	No
On-Site Receptor				
Project Construction – Phase 2 only Emissions	29	5.3	0.25	0.037
Operation – Vehicle Traffic	1.0	1.0	0.028	0.028
Cumulative Total (construction and operation)	***30***	***6.3***	***0.28***	***0.065***
Criteria within APEZ	7	7	0.20	0.20
Significant?	Yes	No	Yes	No

SOURCE: Ramboll ENVIRON, 2017.

Implementation of **Mitigation Measure M-AQ-3, Construction Air Quality**, would reduce the magnitude of this impact to a less-than-significant level. While emission reductions from limiting idling, educating workers and the public and properly maintaining equipment are difficult to quantify, other measures, specifically the requirement for equipment with Tier 2 engines and Level 3 Verified Diesel Emission Control Strategy (VDECS) can reduce construction emissions by 89 to 94 percent compared to equipment with engines meeting no emission standards and without a VDECS.[77] Emissions reductions from the combination of Tier 2 equipment with Level 3 VDECS is almost equivalent to requiring only equipment with Tier 4 Final engines, which may not yet be available for all equipment types subject to the mitigation. The Air Quality Technical Report also evaluated total risk from project construction and operation with implementation of **Mitigation Measure M-AQ-3**. The mitigated increased cancer risks and $PM_{2.5}$ concentrations from construction and operation of the proposed project for the maximally impacted off-site and on-site site receptors are presented in **Table 9**, which shows that the proposed project's localized cancer risk and $PM_{2.5}$ concentration contributions would be below the applicable

[77] PM emissions benefits are estimated by comparing off-road PM emission standards for Tier 2 with Tier 1 and Tier 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 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).

thresholds. Therefore, compliance with **Mitigation Measure M-AQ-3** would reduce localized health risk impacts on new and nearby sensitive receptors to a ***less-than-significant*** level.

Mitigation Measure M-AQ-3 – Construction Air Quality. The project sponsor or the project sponsor's Contractor shall comply with the following:

A. *Engine Requirements.*

1. Electric construction equipment used during the Phase 1 construction period shall include air compressors, concrete/industrial saws, signal boards, pumps, cement and mortar mixers, and stationary cranes. Electric construction equipment used during the Phase 2 construction period shall include air compressors, concrete/industrial saws, signal boards, pumps, cement and mortar mixers, and stationary cranes.

2. 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.

3. Where access to alternative sources of power is reasonably available, portable diesel engines shall be prohibited.

4. 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.

5. The Contractor shall require that construction workers and equipment 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), and that no air quality significance threshold used in this Initial Study would be exceeded.

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 or not commercially available; 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 seeking a waiver, the Contractor must use the next cleanest piece of off-road equipment, according to Table M-AQ-3a-3, and submit documentation showing that no air quality significance threshold used in this Initial Study would be exceeded. No waivers shall be granted if an air quality significance threshold would be exceeded by doing so.

TABLE M-AQ-3A-3 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. Within six months of completion of construction activity, 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.

Siting Sensitive Land Uses

The proposed project would include development of 584 dwelling units, which would be considered a sensitive land use for the purposes of air quality evaluation. For sensitive use projects within the APEZ as defined by Article 38, such as the proposed project, Article 38 requires that the project sponsor submit an Enhanced Ventilation Proposal for approval by the Department of Public Health (DPH) that achieves protection from $PM_{2.5}$

(fine particulate matter) equivalent to that associated with a Minimum Efficiency Reporting Value 13 (MERV 13) filtration. DBI will not issue a building permit without written notification from the Director of Public Health that the applicant has an approved Enhanced Ventilation Proposal.

In compliance with Article 38, the project sponsor has submitted an initial application to DPH.[78] The regulations and procedures set forth by Article 38 would protect sensitive receptors occupying the proposed residential units. This topic will not be discussed in the EIR.

Impact AQ-4: The proposed project would not conflict with, or obstruct implementation of the *2010 Clean Air Plan*. (Less than Significant)

The most recently adopted air quality plan for the SFBAAB is the 2010 CAP. The CAP is a road map that demonstrates how the San Francisco Bay Area will achieve compliance with the state ozone standards as expeditiously as practicable and how the region will reduce the transport of ozone and ozone precursors to neighboring air basins. In determining consistency with the CAP, this analysis considers whether the project would (1) support the primary goals of the CAP, (2) include applicable control measures from the CAP, and (3) avoid disrupting or hindering implementation of control measures identified in the CAP.

The primary goals of the CAP are to (1) reduce emissions and decrease concentrations of harmful pollutants, (2) safeguard the public health by reducing exposure to air pollutants that pose the greatest health risk, and (3) reduce greenhouse gas emissions. To meet the primary goals, the CAP recommends specific control measures and actions. These control measures are grouped into various categories and include stationary and area source measures, mobile source measures, transportation control measures, land use measures, and energy and climate measures. The CAP recognizes that to a great extent, community design dictates individual travel mode, and that a key long-term control strategy to reduce emissions of criteria pollutants, air toxics, and greenhouse gases from motor vehicles is to channel future Bay Area growth into vibrant urban communities where goods and services are close at hand, and people have a range of viable transportation options. To this end, the CAP includes 55 control measures aimed at reducing air pollution in the SFBAAB.

The measures most applicable to the proposed project are transportation control measures and energy and climate control measures. The proposed project's impact with respect to greenhouse gas emissions is discussed in Topic 7, *Greenhouse Gas Emissions*, which demonstrates that the proposed project would comply with the applicable provisions of the City's Greenhouse Gas Reduction Strategy.

The compact development of the proposed project and high availability of viable transportation options would ensure that residents could bicycle, walk, and ride transit to and from the project site instead of taking trips via private automobile. These features ensure that the proposed project would avoid substantial growth in automobile trips and vehicle miles traveled. The proposed project's anticipated 1,123 net new p.m. peak hour vehicle trips would result in a minimal increase in air pollutant emissions, as discussed in Impact AQ-2.[79] Furthermore, the proposed project would be generally consistent with the *General Plan*, as discussed in Chapter III, *Plans and Policies*, of the DEIR. Transportation control measures that are identified in the CAP are implemented by the *General Plan* and the *Planning Code*, through the City's Transit First Policy, bicycle parking requirements, and transportation sustainability fees, along with the Transportation Demand Management

[78] City and County of San Francisco Department of Public Health, *Article 38 Application 1629 Market Street*, April 2014.
[79] Fehr & Peers, *1629 Market Street Transportation Impact Study, Case No. 2015-005848ENV*, March 2017.

program. Compliance with these policies, requirements, and fees would ensure the proposed project includes relevant transportation control measures specified in the CAP. Therefore, the proposed project would include applicable control measures identified in the CAP to the meet the CAP's primary goals.

Examples of a project that could cause the disruption or delay of CAP control measures are projects that would preclude the extension of a transit line or bike path, or projects that propose excessive parking beyond parking requirements. The proposed project would demolish the UA Local 38 building and a majority of the Lesser Brothers Building, and construct approximately 498,100 square feet of residential use that would contain 584 residential units; approximately 13,000 square feet of ground-floor retail/restaurant space; 27,300 square feet of office and assembly use; and 32,800 square feet of publicly-accessible and common open space use. The proposed project would be located within a dense, walkable urban area near a concentration of regional and local transit service. The proposed project would not preclude the extension of a transit line or a bike path or any other transit improvement, and thus would not disrupt or hinder implementation of control measures identified in the CAP.

For the reasons described above, the proposed project would not interfere with implementation of the CAP, and because the proposed project would be consistent with the applicable air quality plan that demonstrates how the region will improve ambient air quality and achieve the state and federal ambient air quality standards, the impact would be ***less than significant***, and no mitigation measures are necessary.

Impact AQ-5: The proposed project would not create objectionable odors that would affect a substantial number of people. (Less than Significant)

Typical odor sources of concern include wastewater treatment plants, sanitary landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing facilities, fiberglass manufacturing facilities, auto body shops, rendering plants, and coffee roasting facilities. During construction, diesel exhaust from construction equipment would generate some odors. However, construction-related odors would be temporary and would not persist upon project completion. Observation indicates that the project site is not substantially affected by sources of odors.[80] Additionally, the proposed project includes residential, office and assembly, open space, and retail/restaurant uses, which would not be a significant source of new odors. Any proposed restaurant would be required to meet regulations regarding proper venting of stove and other kitchen equipment, and an application to be reviewed and approved by the Department of Building Inspections would be required prior to construction of a restaurant. Therefore, odor impacts from the proposed project would be ***less than significant***, and no mitigation measures are necessary.

Impact C-AQ-1: The proposed project, in combination with past, present, and reasonably foreseeable future development in the project area would contribute to cumulative air quality impacts. (Less than Significant with Mitigation)

As discussed above, regional air pollution is by its very nature largely a cumulative impact. Emissions from past, present, and future projects contribute to the region's adverse air quality on a cumulative basis. No single project by itself would be sufficient in size to result in regional nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulative adverse air quality impacts. The

[80] Reconnaissance of project site and environs was conducted by ESA staff on January 25, 2017.

project-level thresholds for criteria air pollutants are based on levels by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants. Therefore, because the proposed project's construction (Impact AQ-1) and operational (Impact AQ-3) emissions would not exceed the project-level thresholds for criteria air pollutants, the proposed project would not be considered to result in a cumulatively considerable contribution to regional air quality impacts.

As discussed above, the project site is located in an area that already experiences poor air quality. The proposed project would add construction-related DPM emissions within the APEZ, resulting in a considerable contribution to cumulative health risk impacts on nearby sensitive receptors. This would constitute a significant cumulative impact. The proposed project would be required to implement **Mitigation Measure M-AQ-3, Construction Air Quality**, as noted above, which will reduce construction period emissions by as much as 94 percent. Implementation of these mitigation measures would reduce the proposed project's contribution to cumulative air quality impacts to a ***less-than-significant*** level.

Topic:		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
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?	☐	☐	☒	☐	☐

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

The BAAQMD has prepared guidelines and methodologies for analyzing GHGs. These guidelines are consistent with CEQA Guidelines Sections 15064.4 and 15183.5, which address the analysis and determination of significant impacts from a proposed project's GHG emissions. CEQA Guidelines Section 15064.4 allows lead agencies to rely on a qualitative analysis to describe GHG emissions resulting from a project. CEQA Guidelines Section 15183.5 allows for public agencies to analyze and mitigate GHG emissions as part of a larger plan for the reduction of GHGs and describes the required contents of such a plan. Accordingly, San Francisco has prepared *Strategies to Address Greenhouse Gas Emissions*,[81] which presents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco's qualified GHG reduction strategy in compliance with the CEQA guidelines. These GHG reduction actions have resulted in a 23.3 percent reduction in GHG emissions in 2012 compared to 1990 levels,[82] exceeding the year 2020 reduction goals outlined in the

[81] San Francisco Planning Department, *Strategies to Address Greenhouse Gas Emissions in San Francisco*, 2010. Available at http://www.sf-planning.org/index.aspx?page=2627, accessed August 8, 2016.
[82] ICF International, *Technical Review of the 2012 Community-wide Inventory for the City and County of San Francisco*, January 21, 2015.

BAAQMD's CAP, Executive Order (EO) S-3-05, and Assembly Bill (AB) 32 (also known as the Global Warming Solutions Act).[83]

Given that the City has met the State and region's 2020 GHG reduction targets and San Francisco's GHG reduction goals are consistent with, or more aggressive than, the long-term goals established under EO S-3-05,[84] EO B-30-15,[85,86] and Senate Bill (SB) 32[87,88] the City's GHG reduction goals are consistent with EO S-3-05, EO B-30-15, SB 32, and the CAP. Therefore, proposed projects that are consistent with the City's GHG reduction strategy would be consistent with the aforementioned GHG reduction goals, would not conflict with these plans or result in significant GHG emissions, and would therefore not exceed San Francisco's applicable GHG threshold of significance.

The following analysis of the proposed project's impact on climate change focuses on the project's contribution to cumulatively significant GHG emissions. Because no individual project could emit GHGs at a level that could result in a significant impact on the global climate, this analysis is in a cumulative context, and this section does not include an individual project-specific impact statement.

Impact C-GG-1: The proposed project would generate greenhouse gas emissions, but not at levels that would result in a significant impact on the environment or conflict with any policy, plan, or regulation adopted for the purpose of reducing greenhouse gas emissions. (Less than Significant)

Individual projects contribute to the cumulative effects of climate change by directly or indirectly emitting GHGs during construction and operational phases. Direct operational emissions include GHG emissions from new vehicle trips and area sources (natural gas combustion). Indirect emissions include emissions from electricity providers; energy required to pump, treat, and convey water; and emissions associated with waste removal, disposal, and landfill operations.

The proposed project would increase the intensity of use of the site by introducing new office/assembly, residential, open space, and retail/restaurant uses on the site. Therefore, the proposed project would contribute to annual long-term increases in GHGs as a result of increased vehicle trips (mobile sources) and office, residential, and

[83] Executive Order S-3-05, Assembly Bill 32, and the CAP set a target of reducing GHG emissions to below 1990 levels by year 2020.

[84] Executive Order S-3-05, sets forth a series of target dates by which statewide emissions of GHGs need to be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels (approximately 457 million metric tons of carbon dioxide equivalents [$MTCO_2e$]); by 2020, reduce emissions to 1990 levels (approximately 427 million $MTCO_2e$); and by 2050 reduce emissions to 80 percent below 1990 levels (approximately 85 million $MTCO_2e$). Because of the differential heat absorption potential of various GHGs, GHG emissions are frequently measured in "carbon dioxide-equivalents," which present a weighted average based on each gas's heat absorption (or "global warming") potential.

[85] Office of the Governor, Executive Order B-30-15, April 29, 2015. Available at https://www.gov.ca.gov/news.php?id=18938, accessed August 8, 2016. Executive Order B-30-15, issued on April 29, 2015, sets forth a target of reducing GHG emissions to 40 percent below 1990 levels by 2030 (estimated at 2.9 million $MTCO_2e$).

[86] 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 (iv) by 2050, reduce GHG emissions by 80 percent below 1990 levels.

[87] 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.

[88] 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.

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 proposed 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, Emergency Ride Home Program, transportation management programs, Transportation Sustainability Fee, Jobs-Housing Linkage Program, bicycle parking requirements, low-emission car parking requirements, and car sharing requirements would reduce the proposed project's transportation-related emissions. These regulations reduce GHG emissions from single-occupancy vehicles by promoting the use of sustainable transportation modes with zero or lower GHG emissions on a per capita basis.

The proposed project would be required to comply with the energy efficiency requirements of the City's *Green Building Code*, Stormwater Management Ordinance, Water Conservation and Irrigation ordinances, and Energy Conservation Ordinance, which would promote energy and water efficiency, thereby reducing the proposed project's energy-related GHG emissions.[89] Additionally, the proposed project would be required to meet the renewable energy criteria of the *Green Building Code*, further reducing the proposed project's energy-related GHG emissions.

The proposed project's waste-related emissions would be reduced through compliance with the City's Recycling and Compositing Ordinance, Construction and Demolition Debris Recovery Ordinance, and *Green Building Code* requirements. These regulations reduce the amount of materials sent to a landfill, reducing GHGs emitted by landfill operations. These regulations also promote reuse of materials, conserving their embodied energy[90] and reducing the energy required to produce new materials.

Compliance with the City's Street Tree Planting requirements would serve to increase carbon sequestration. 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 (VOCs).[91] Thus, the proposed project was determined to be consistent with San Francisco's GHG reduction strategy.[92]

The project sponsor is required to comply with these regulations, which have proven effective as San Francisco's GHG emissions have measurably decreased when compared to 1990 emissions levels, demonstrating that the City has met and exceeded EO S-3-05, AB 32, and the CAP GHG reduction goals for the year 2020. Other existing regulations, such as those implemented through AB 32, will continue to reduce a proposed project contribution

[89] Compliance with water conservation measures reduce the energy (and GHG emissions) required to convey, pump and treat water required for the project.
[90] Embodied energy is the total energy required for the extraction, processing, manufacture and delivery of building materials to the building site.
[91] 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.
[92] San Francisco Planning Department, *Greenhouse Gas Analysis: Compliance Checklist for 1629 Market Street*, June 24, 2016.

to climate change. In addition, San Francisco's local GHG reduction targets are consistent with the long-term GHG reduction goals of EO S-3-05, EO B-30-15, SB 32, and the CAP. Therefore, because the proposed project is consistent with the City's GHG reduction strategy, they would also be consistent with the GHG reduction goals of EO S-3-05, EO B-30-15, SB 32 and the CAP, would not conflict with these plans, and would therefore not exceed San Francisco's applicable GHG threshold of significance. As such, the proposed project would result in a ***less-than-significant*** impact with respect to GHG emissions. No mitigation measures are necessary.

Topic:		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
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?	☐	☐	☒	☐	☐

Impact WS-1: The proposed project would not alter wind in a manner that substantially affects public areas. (Less than Significant)

This analysis of wind conditions is based on a wind technical memorandum, which is summarized here.[93]

Average wind speeds in San Francisco are the highest in the summer and lowest in winter. However, the strongest peak winds occur in winter, under storm conditions. Throughout the year, the highest typical wind speeds occur in mid-afternoon and the lowest in the early morning. Of the primary wind directions, five have the greatest frequency of occurrence and also make up the majority of the strong winds that occur. These winds include the northwest, west-northwest, west west-southwest, and southwest.

Certain areas of greater downtown San Francisco are subject to *Planning Code* wind criteria relevant to new construction. Although the project site is not within such an area, the CEQA analysis of wind effects relies on the *Planning Code* wind regulatory framework, which is therefore outlined below. The *Planning Code* sets wind speed criteria for both pedestrian comfort and hazardous winds, and requires buildings to be shaped so as not to cause ground-level wind currents to exceed the hazard criterion or, to the extent feasible, the comfort criteria. The wind hazard criterion, which is also used as the City's CEQA threshold of significance, is a wind speed of 26 miles per hour (mph) for a single full hour of the year.[94] The wind comfort criteria are specified as the wind speed exceeded 10 percent of the time; for areas of substantial pedestrian use, the comfort criterion speed is 11 mph, while for public seating areas the comfort criterion is seven mph.[95]

[93] Environmental Science Associates, *Potential Wind Effects of Mixed Use Residential Project, 1629 Market Street Case No. 2015-005848ENV Technical Memo*, September 19, 2016.

[94] The wind hazard criterion is derived from the 26 mph hourly average wind speed that would generate a 3-second gust of wind at 20 meters per second, a commonly used guideline for wind safety. Because the wind data on which wind-tunnel testing in San Francisco is based was collected at one-minute averages (i.e., a measurement of sustained wind speed for one minute, collected once per hour), the 26 mph hourly average is converted to a one-minute average of 36 mph, which is used to determine compliance with the 26 mph one-hour hazard criterion in the *Planning Code*. (Arens, E. et al., "Developing the San Francisco Wind Ordinance and its Guidelines for Compliance," Building and Environment, Vol. 24, No. 4, pp. 297–303, 1989.)

[95] Wind speeds for both the wind hazard and comfort criteria are presented in terms of an "equivalent wind speed," which is an average wind speed (mean velocity), adjusted to include the level of gustiness and turbulence.

While the *Planning Code* hazard (and comfort) criteria are specific to pedestrian wind conditions, which are typically measured on sidewalks during wind-tunnel testing, the resulting wind speed measurements are also generally instructive with respect to wind speeds experienced by bicyclists. This is because bicycle lanes, where they exist, are typically adjacent to parking lanes; hence bike lanes are generally within less than 10 feet of the sidewalk. (Even where there are no bike lanes, cyclists tend to ride to the far right on a street.) This is close enough that wind conditions on a sidewalk are fairly similar to those in the nearest bike lane. Cyclists know, for example, that uncomfortable wind conditions often exist around the intersection of Market, Polk, and Tenth Streets—such as, adjacent to the Fox Plaza building—and at the intersection of 5th and Howard Streets, particularly in the afternoon in summer, when, as noted above, San Francisco typically experiences its highest average wind speeds. Therefore, while the City has no numerical criterion for wind effects on bicyclists, uncomfortable winds for pedestrians are likely to result in uncomfortable winds for bicyclists close by. A pedestrian wind hazard may also cause potentially hazardous conditions for bicyclists in proximate locations.

The proposed project would include the demolition or partial demolition of two existing onsite structures, rehabilitation of a third existing building, and construction of five new structures ranging in height from 55 to 85 feet (plus mechanical, stair, and elevator penthouses up to 16 feet in height).[96] In general, the Planning Department finds that based on experience with other projects and expert opinion, projects under 80 feet in height typically do not have the potential to generate significant wind impacts. The proposed project does, however, include three buildings (Buildings A, B, and D) that would be just over this height, at 85 feet, plus 16-foot-tall mechanical, stair, and elevator penthouses.

To evaluate how the proposed project could affect ground-level winds for pedestrians and bicyclists, it is necessary to first examine upwind buildings and topography in order to understand whether and how these factors affect existing winds that would strike the project buildings. Upwind and to the west of the project site, the topography is relatively flat east of Gough Street, and the area generally consists of buildings that range from one to five stories tall, along with a surface parking lot between Stevenson and Colton Streets. These buildings to the west and southwest include a five-story building (1649–1655 Market Street) across Brady Street from the site, as well as a six-story building across Market Street (1670–1678 Market Street). Although southwest winds approach the project site parallel to Market Street, the building at 1649–55 Market Street would offer some wind protection to the lower stories of the project buildings. Upwind and to the north, the area generally consists of three- to eight-story buildings spaced relatively closely together. Although not forming a continuous wall, these buildings provide substantial wind shelter for the project site from northwest, west-northwest, and west winds. These upwind structures to the north include a five-story building directly upwind across Market Street (1600 Market Street), and a new eight-story building at One Franklin Street, each of which are comparable in height to the height of the proposed project buildings, and would therefore reduce the speed of the wind as it approaches the project site. Additionally, to the northwest is an eight-story building at 55 Page Street with a nearly 26,000-square-foot footprint

[96] Building heights discussed herein are *Planning Code* heights, measured at the rooftop. Buildings effects' on ground-level winds are the result of the overall building mass, which is largely the function of a structure's roof height, length, and width. Relatively small rooftop projections, such as mechanical, stair, and elevator penthouses, typically have little to no effect on winds at sidewalk level, particularly where, as here, such features would generally be set back a minimum of 20 feet from building facades. In such an instance, even a 16-foot-tall mechanical penthouse that is *Planning Code*-compliant and thus occupies no more than 20 percent of the roof could have only a localized effect on rooftop winds, but its effect on ground-level winds would be negligible. Even a stair tower situated along a building façade, such as the proposed project, would have a footprint far too small to make a meaningful contribution to the building's overall effect on ground-level winds. Therefore, rooftop mechanical features are not discussed further in the wind analysis.

that provides substantial wind shelter for the project site. The larger area farther upwind of the project site is occupied by development that generally ranges from 20 feet to about 85 feet in height. This is the development pattern in the area over the city blocks to the north, northwest, and west of the site for a distance of well beyond one-quarter of a mile, which is far greater than the distance over which these upwind buildings of relatively modest height can influence downwind conditions.

Wind-tunnel testing in 2014 for a 120-foot-tall building (136 feet to the top of the rooftop wind screen) now under construction northeast of the project site and across Market Street, at 1546–1564 Market Street, included three locations along the eastern portion of the proposed project's Market Street frontage. Wind speeds exceeded 10 percent of the time at these points ranged from 12 to 14 mph under then-existing conditions and from 11 to 12 mph under cumulative conditions, with both the 1546–1564 Market Street building and the building at One Franklin Street (now complete) in place. Wind speeds exceeded 10 percent of the time at two locations tested on 12th Street, adjacent to the Civic Center Hotel, were considerably lower—between 6 and 9 mph under both then-existing and cumulative scenarios. None of the test points experienced wind speeds that exceeded the wind hazard criterion; under cumulative conditions, the hazard speed at each these test points was less than two-thirds of the hazard criterion speed.[97] This cumulative scenario represents essentially how conditions will be prior to the construction of the proposed project, and can be taken to represent the project's existing condition, which is moderately windy.

With implementation of the proposed project, there would likely be perceptible increases in winds at some locations along the Market Street, Brady Street, and Colton Street sidewalks, surrounding the project block. However, perceptible increases would not be expected to affect most areas of the site vicinity, and no new exceedances of the pedestrian wind hazard criterion would be expected to occur, for reasons described herein in more detail. Because the project site is somewhat sheltered by existing development from prevailing winds, most increases in sidewalk wind speeds resulting from the proposed project would likely be relatively minor (up to about two mph). In particular, because the street grids north and south of Market Street do not align, many of the prevailing winds would not reach the proposed project without having been at least partially interrupted and redirected by existing upwind development. This mismatch of the street grids, therefore, would offer substantial shelter from the prevailing northwesterly, west-northwesterly, and westerly winds, thereby minimizing project effects with respect to winds from these directions, and any resulting increases in wind speed would be anticipated to be modest—generally, no more than about two mph, as noted above. Given the moderate wind speeds under existing conditions (less than two-thirds of the hazard criterion speed), such increases would be unlikely to result in any new exceedance of the wind hazard criterion that could affect either pedestrians or bicyclists. With particular respect to sidewalks along Market Street and the adjacent eastbound bicycle lane, the varied façade planes of the proposed project's building at Market and Brady Streets would slow winds parallel to Market Street, further reducing the potential for ground-level wind speed increases, and further reducing the potential for wind hazard exceedances that could affect pedestrians or bicyclists.

With implementation of the proposed project, wind speeds could also decrease at some locations, or there could be no change in wind speed at many sidewalk locations proximate to the project site. Overall, the changes in wind speed that would result from the proposed project are projected to be no more than plus or minus two mph on ground-level winds at most locations. Some wind approaching the project site, particularly from the southwest, would be diverted into the proposed Brady Open Space on the project site, but would be unlikely to

[97] RWDI, *Report: Pedestrian Wind Consultation Wind Tunnel Tests, 1654-64 Market Street, San Francisco, CA,* June 11, 2014.

result in a new wind hazard within the open space because of the sheltering that would be offered by the proposed project itself. Based on the above analysis, the proposed project would have a ***less-than-significant*** impact related to pedestrian or bicyclist wind conditions.

Impact WS-2: The proposed project would not create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas. (Less than Significant)

Planning Code Section 295 generally prohibits new structures over 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.

The threshold for determining the significance of impacts under CEQA is whether the proposed project would create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas, regardless of whether those facilities or areas are protected by *Planning Code* Section 295 or not (i.e., under jurisdiction of public entities other than the Recreation and Park Commission or privately-owned and publicly accessible open space). In addition, as under *Planning Code* Section 295, CEQA analysis of shadow impact takes into account usage of the open space, time of day and year of project shadow, physical layout and facilities affect; the intensity, size, shape, and location of the shadow; and the proportion of open space affected.

No City parks or other publicly-accessible open spaces exist within the potential shadow area of the proposed project, and therefore no parks or open spaces would be affected by project shadow; effects would be less than significant.[98]

Shadow diagrams were prepared to demonstrate the character and extent of shadow that would be cast by the proposed project on publicly-accessible areas, including streets and sidewalks in the project vicinity (see **Figure 2, Shadow Diagrams, June 21—6:46 a.m., 11:00 a.m., 3:00 p.m., and 6:00 p.m.**, p. 63, **through Figure 4, Shadow Diagrams, December 21—8:19 a.m., 10:00 a.m., 2:00 p.m., and 3:54 p.m.**, p. 65). Note that this analysis includes all rooftop features that extend above the building height, as allowed by the *Planning Code* and discussed in the Project Description.[99,100] The shadow diagrams provided enable a comparison of baseline shadows (i.e., shadows cast by existing structures) with the proposed project's net new shadow for four representative days of the year beginning at one hour after sunrise and continuing hourly until one hour before sunset. The three days analyzed are summer solstice (June 21), when the sun is at its highest; fall equinox (September 21), when day and night are of equal length; and winter solstice (December 21), when the sun is at its lowest.

[98] San Francisco Planning Department, "1601–1637 Market Street Preliminary Shadow Analysis," July 21, 2015.
[99] CADP, *Shadow Diagrams, 1601–1637 Market Street Preliminary Shadow Analysis*, July 21, 2015. The shadow diagrams were based on a preliminary project design (March 2016) in which the proposed project included an approximately 25-foot-tall vertical addition to the existing Civic Center Hotel and the UA Local 38 building was proposed at a height of 68 feet. The project currently proposes no vertical addition to the Civic Center Hotel and a UA Local 38 building that is 58 feet tall, or 10 feet shorter than assumed in the shadow diagrams, which are therefore conservative.
[100] As noted in the analysis of wind, above, building heights given are rooftop height, measured according to the *Planning Code*. In the shadow diagrams, unlike the wind analysis, rooftop stair and elevator towers are taken into account in the shadow analysis. However, as noted in footnote 96, p. 70, most stair and elevator penthouses would be set back from the project buildings' street walls. As a result, those vertical projections that would be close enough to the building facades to cast net new shadow would generally do so only during approximately the first two hours after sunrise and the last two hours before sunset, when shadows are at their longest. A stair tower at the southwest corner of the Colton Affordable Housing building would cast shadow over a slightly longer during the morning around the summer solstice: this shadow would reach Colton Street until about 10:00 a.m.

June 21st 6:46 am

June 21st 11:00 am

June 21st 3:00 pm

June 21st 6:00 pm

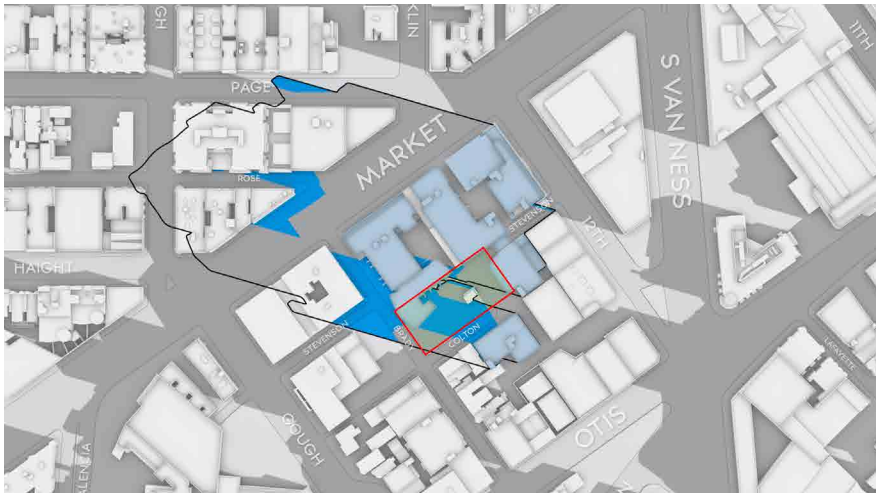
Proposed Brady Park
Existing Structures
Proposed Structures
Shadows from Proposed Structures

0 200
Feet

SOURCE: CADP, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure 2
Shadow Diagrams
June 21 – 6:46 a.m., 11:00 a.m., 3:00 p.m., and 6:00 p.m.



September 21st 7:57 am

September 21st 11:00 am

September 21st 2:00 pm

September 21st 5:00 pm

Proposed Brady Park
Existing Structures
Proposed Structures
Shadows from Proposed Structures

0 200
Feet

SOURCE: CADP, 2016

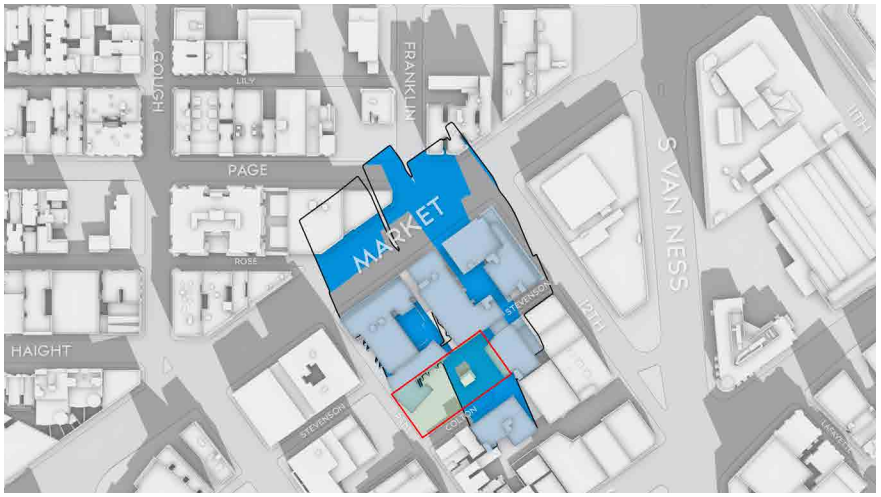
1629 Market Street: Case No. 2015-005848ENV

Figure 3

Shadow Diagrams

September 21 – 7:57 a.m., 11:00 a.m., 2:00 p.m., and 5:00 p.m.

December 21st 8:19 am



December 21st 10:00 am

December 21st 2:00 am

December 21st 3:45 am

Proposed Brady Park
Existing Structures
Proposed Structures
Shadows from Proposed Structures

0 200
Feet

SOURCE: CADP, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure 4
Shadow Diagrams
December 21 – 8:19 a.m., 10:00 a.m., 2:00 p.m., and 3:54 p.m.

The proposed project would cast net new shadow on nearby sidewalks including those along Market Street, Brady Street, Stevenson Street, and around the confluence of Mission Street and South Van Ness Avenue at certain times of day throughout the year. Most of the sidewalks in this area are already shadowed by existing buildings and, given that sidewalks are typically used by pedestrians traveling between destinations and not as a recreational resource, the additional project-related shadow would not substantially affect the use of the sidewalks. Therefore, the shadow impact on the surrounding sidewalks as a result of the proposed project would be less than significant.

For the above reasons, the proposed project's net new shadow would not be anticipated to substantially affect the use of any publicly-accessible areas, including nearby streets and sidewalks. Given the foregoing, the proposed project would result in a ***less-than-significant*** impact with respect to shadow.

The proposed project would develop a new privately-owned, publicly-accessible open space (POPOS), referred to herein as the Brady Open Space. The Brady Open Space would be publicly-accessible, but would not be under the jurisdiction of the Recreation and Park Commission and would not be subject to Section 295. CEQA analysis covers impacts of a project on existing conditions, and not on elements of the project itself. Therefore, there is no shadow impact to this open space, which does not exist under current conditions. For informational purposes, the shadow diagrams prepared depict project shadow on the planned Brady Open Space, and those effects are discussed below for informational purposes only.

The shadow diagrams in **Figure 2 through Figure 4** reveal that the proposed project would add net new shadow to portions of the planned Brady Open Space primarily in the morning before 11:00 a.m. and afternoon after 3:00 p.m. throughout the year but allow relatively open sunshine during the middle of the day. The planned Brady Open Space would receive shadow from the proposed project on the north side of the park beginning at 6:46 a.m. on June 21, a time when much of the open space would already be in shadow from existing structures. By 8:00 a.m., existing shadow would be largely gone, and shadow from the proposed project would increase on the open space until 11:00 a.m. when it would be mostly gone. Shadow from the proposed project would begin to encroach again on the north side of the open space by 2:00 p.m. and would cover a majority of the open space by shortly after 4:00 p.m. Even by 6:00 p.m., the southwest corner of the open space would remain in sunshine. By 7:00 p.m., the entire open space would be in shade from a combination of the proposed project and existing structures.

On the morning of the fall equinox the Brady Open Space would be nearly entirely in shadow from the project and surrounding existing structures at 8:00 a.m. Sunlight would then begin to increase, and the open space would be nearly entirely in sunshine from 12:00 noon to 2:00 p.m. After 2:00 p.m., shade from the project would increase through the afternoon, covering the majority of the open space by 4:00 p.m. but leaving the southwestern corner in sun until after 6:00 p.m.

On the winter solstice, the Brady Open Space would be mostly in shade in the morning from the project and existing structures until 10:00 a.m., at which time the western half of the open space would be in sunlight. Between about 1:00 p.m. and 2:30 p.m., nearly all of the park would be in sunlight. Shadow from the project would encroach onto the northern portion of the open space by 3:00 p.m., and shadow from existing buildings to the west would begin to cover the western portion of the open space shortly thereafter, although, even by just before 4:00 p.m. there would still be a good portion of the open space on the southeast side in sunlight.

The planned Brady Open Space has not yet been constructed, so specific usage patterns cannot be presumed. In general, however, based on preliminary design information provided by the project sponsor, the Brady Open Space is anticipated to be used largely for passive recreation (e.g., seating, walking, and picnicking). Due to its relatively limited size (0.4 acre), the open space is not proposed to include active recreational areas (e.g., sports fields), although it may host a small children's playground.

As noted above, the proposed project would not add substantial new shadow on the planned open space in the early/mid-afternoon during any time of the year, meaning that the lunchtime and mid-day periods would provide the greatest opportunity for use of the open space in the sun. Because the Brady Open Space would be built as part of the proposed project, usage patterns at the open space would develop with the project buildings in place.

Impact C-WS-1: The proposed project, in combination with other past, present, and reasonably foreseeable projects, would not result in cumulative impacts related to wind. (Less than Significant)

As discussed above in the introduction to Section E, *Evaluation of Environmental Effects*, there are a number of cumulative projects proposed in the project vicinity. This includes five towers of 250 feet in height or more, all of which—individually and/or in combination—could result in substantial changes in ground-level wind conditions of the project area. In particular, it is anticipated that wind speeds on Market Street east of Van Ness Avenue could increase, both on the sidewalks and in the bicycle lanes. However, all of the taller projects proposed in the project vicinity at One Oak Street, 10 South Van Ness Avenue, 30 Otis Street, 1500 Mission Street, and, potentially, 30 Van Ness Avenue, respectively, would be located downwind of the 1629 Market Street project site. It is anticipated that the greatest potential cumulative effect on ground-level winds would be the above-described increase in winds on Market Street east of Van Ness Avenue, approximately 400 feet east of the project site. Given the proposed project's maximum height of 85 feet, the project would be too distant from the downwind towers to result in wind effects that would interact meaningfully with those towers. Rather, the proposed project would have little or no influence on pedestrian-level or bicyclist winds east of the project site near the planned high-rise developments noted above. This is because those much taller building towers would generate strong downward flows of wind that would not be affected by the proposed project, and these downward flows would dominate ground-level winds near the bases of their own future cumulative high-rise buildings. This conclusion is supported by supplemental wind tunnel testing that was conducted for the nearby project at One Oak Street to evaluate interactions between the different cumulative development projects in the vicinity. This additional testing revealed that future projects at 10 South Van Ness Avenue and, potentially, 30 Van Ness Avenue would likely have larger influences on cumulative wind conditions, especially along Market Street from Van Ness/South Van Ness Avenues eastward, than would other cumulative projects or the proposed 1629 Market Street Mixed-Use Project.[101] The relative contribution from the proposed project to the ground-level winds generated by this group of much-taller proposed projects would be small, given the prevailing wind directions, the distance between the proposed project and the location of anticipated cumulative wind increases, and the fact that proposed project would result in relatively small changes in pedestrian (and bicyclist) wind conditions (up to about two mph), as described above. Accordingly, the proposed project, in combination with other past, present, and reasonably foreseeable projects, would not contribute considerably

[101] BMT Fluid Mechanics, *One Oak Street Project, Wind Microclimate Study*, Appendix G, November 4, 2016.

to a cumulative impact related to wind. Therefore, the cumulative wind impact would be ***less than significant***, and no mitigation measures are necessary.

Impact C-WS-2: The proposed project, in combination with other past, present, and reasonably foreseeable projects, would not result in cumulative impacts related to shadow. (Less than Significant)

With respect to potential cumulative shadow impacts, the above-noted taller proposed projects—One Oak Street, 10 South Van Ness Avenue, 30 Otis Street, 1500 Mission Street, and, potentially, 30 Van Ness Avenue—would all add shadow to streets and sidewalks in the project vicinity. Some would also shade City parks, including Patricia's Green, Koshland Park, Page & Laguna Mini Park, and, potentially (in the case of development including an increase in the height limit) at 30 Van Ness Avenue, Civic Center Plaza, Hayes Valley Playground, Margaret Hayward Playground/Jefferson Square, the Buchanan Street Mall, Page Street Garden, and Howard & Langton Mini Park, as well as the Fulton Street Mall, which is not a City park but is a publicly-accessible open space under the jurisdiction of San Francisco Public Works. Cumulative shadow could also be added to the landscaped areas surrounding City Hall, the War Memorial Complex, and the Main Library. However, as noted above, the proposed project at 1629 Market Street would add no new shadow to any City park or other existing publicly-accessible open space. Therefore, the proposed project would not contribute to any cumulative shadow impacts and the cumulative impact would be ***less than significant***.

For informational purposes, shadow conditions on the Brady Open Space with cumulative projects were identified. Three of the above projects would add new shadow to the open space: 1500 Mission Street, 10 South Van Ness Avenue, and 30 Otis Street. (The sites at One Oak Street and 30 Van Ness Avenue are too far north for buildings developed on those sites to shade the Brady Open Space.) As with the proposed project, both the 1500 Mission Street project and 10 South Van Ness project would only add shadow to Brady Open Space in the morning around the summer solstice, due to their location east of the site, and only before about 8:30 a.m. After this time, and during the rest of the year, the shadow from these buildings would be angled too far north to reach the Brady Open Space. The project at 30 Otis Street is southeast of the site, and as a result would add shadow at the summer solstice and the spring and fall equinoxes until about 10:00 a.m. Because much of the shadow from these cumulative projects would cover the same area of the open space at the same time as shadow from the proposed project, and because the cumulative shadow would occur only during the relatively early morning hours, the proposed project, in combination with these cumulative projects, would not substantially affect use of the Brady Open Space.

Topic:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
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 San Francisco Recreation and Parks Department (SFRPD) administers more than 220 parks, playgrounds, and open spaces throughout the City, as well as recreational facilities including recreation centers, swimming pools, golf courses, and athletic fields, tennis courts, and basketball courts.[102] The project site is located in an intensely developed urban neighborhood that does not contain large regional park facilities, but does include a number of neighborhood parks and open spaces, as well as other recreational facilities. The *General Plan*'s Recreation and Open Space Element (ROSE), revised and updated in April 2014, identifies portions of the project site area as a high needs open space area.

There are several facilities managed by the SFRPD within approximately 0.50 mile near the project site:

- **Patricia's Green**, at Octavia Street between Hayes Street and Fell Street, is a 0.45-acre park containing a playground, picnic tables, and art exhibitions, located approximately 0.5 mile northwest of the project site.
- **Page & Laguna Mini Park**, mid-block between Rose Street and Page Street near Laguna Street, is a 0.15-acre mini park featuring a pathway that leads through flowering beds and apple trees with seating areas, and is located approximately 0.5 mile west of the project site.
- **Koshland Park**, at the intersection of Page and Buchanan Street, is a 0.82-acre park which features multiple play structures, a sand pit, a plaza area, a community learning garden, a half basketball court and grass areas, located approximately 0.5 mile west of the project site.
- **Hayes Valley Playground**, at the intersection of Hayes and Buchanan Streets, is a 0.61-acre park with a 2,500-square-foot clubhouse, a playground, a tot lot, public stage and plaza, outdoor fitness equipment, and community garden plots, located approximately 0.6 mile west of the project site.
- **Civic Center Plaza**, at the intersection of Grove and Larkin Streets, is an approximately 4.5-acre public open space containing lawn areas and two tot lots, located adjacent to the City Hall, approximately three blocks northeast of the project site (0.37 mile).

In addition, **United Nations Plaza**, an approximately 2.6-acre pedestrian mall extending from Market Street to Hyde Street in the city's Civic Center area, is located 0.55 mile northeast of the project site. It is not managed by the SFRPD. United Nations Plaza contains hardscaped and landscaped areas and limited seating and is used

[102] San Francisco Planning Department, *Recreation and Open Space Element* (ROSE), April 2014, p. 15. Available at http://www.sf-planning.org/ftp/General_Plan/Recreation_OpenSpace_Element_ADOPTED.pdf, accessed August 17, 2016.

primarily for passive recreation, in addition to holding events such as weekly farmer's markets and occasional art festivals.

As noted above, the ROSE identifies portions of the project site area as a "high needs area" of the City. The ROSE defines a "high needs area" of the City as an area "with high population densities, high concentrations of seniors and youth, and lower income populations that are located outside of existing park service areas."[103] As shown on Maps 4a through 4c of the ROSE, the project site is located within the 0.5-mile service area of "Active Use/Sports Fields" and "Passive Use/Tranquil Spaces." As shown on Maps 5a, 5c, and 5d of the ROSE, portions of the project site are within an area of the City that exhibits higher population densities (Map 5a) and seniors (Map 5d), but is not in an area that exhibits higher concentrations of children and youth (Map 5c) relative to the City as a whole. The project site is also located within an area with a relatively higher percentage of high-income households relative to the City as a whole (Map 5b) and an area designated to absorb future population growth (Map 6). Based on these variables, a composite map was generated to identify areas of the City that receive priority when opportunities to acquire land for development of new parks arise and when funding decisions for the renovation of existing parks are made (Map 7).[104] As shown on Map 7 of the ROSE, a portion of the project site itself is located within a "high needs area."

Impact RE-1: The proposed project would not result in a substantial increase in the use of existing parks and recreational facilities, the deterioration of such facilities, include recreation facilities, or require the expansion of recreational facilities, or physically degrade existing recreational resources. (Less than Significant)

The proposed project would partially and fully demolish two existing buildings, rehabilitate an existing building, and construct five new buildings that would include residential, retail, and assembly/office uses for a union facility. The proposed project would also develop approximately 18,300 square feet of publicly-accessible open space as the Brady Open Space, and provide approximately 5,200 square feet of publicly-accessible open space in a mid-block alley between Buildings A and B that would connect Market Street to the Brady Open Space. In addition, the proposed project would develop approximately 9,300 square feet of open space for residents and employees on the project site in the form of commonly-accessible rooftop decks and courtyards, for a total of 32,800 square feet of common residential and publicly-accessible open space.

As described in Topic E.2, *Population and Housing*, the proposed project would add 921 permanent net new residents and 14 net new employees on the project site, which would increase the demand for parks and recreational services in the project vicinity. The proposed project would provide passive recreational uses for residents and employees onsite with the Brady Open Space and the mid-block alley, as noted above. The residential buildings would also include common open spaces that would be accessible to building residents only. Building A would provide approximately 4,600 square feet of common open space at the ground level and on a rooftop deck. Building B would provide approximately 2,600 square feet of common open space. Building D would provide approximately 1,500 square feet of common open space on a rooftop deck. The Colton Street Affordable Housing Building would include approximately 600 square feet of common open space. Building C would not provide open space.

[103] San Francisco Planning Department, *ROSE*, April 2014, p. 13.
[104] Ibid., Maps 4 through 7.

In addition to the open space proposed as part of the project, the project's residents and employees would be within walking distance of the above-noted open spaces. With the availability of open space as part of, and in the immediate vicinity of, the project site, and the incremental population increase of 2.9 percent in the vicinity of the project site due to the proposed project, the proposed project would not result in a substantial increase in the use of existing parks and recreational facilities. Given the incremental population increase that would result from the proposed project, the proposed project would not deteriorate the park or recreational facilities noted above, nor would it require the expansion of the recreational facilities noted above. Furthermore, because the proposed project would not generate a substantial increase in population, it would not physically degrade existing recreational resources in the project area. Overall, the proposed project would not create a substantial increase in the use of existing neighborhood or regional recreational facilities such that physical deterioration or degradation of existing facilities would occur, nor would it result in the need for the expansion or construction of recreational facilities. Therefore, this impact would be ***less than significant***, and no mitigation measures are necessary.

Impact C-RE-1: The proposed project, in combination with other past, present, or reasonably foreseeable projects would result in less-than-significant cumulative impacts to recreational resources. (Less than Significant)

Past, present, and reasonably foreseeable future projects located within a 0.25-mile radius of the project site are identified in **Table 1, Cumulative Projects in a 0.25-Mile Radius of Project Site**, p. 8. As discussed in Topic 2, *Population and Housing*, these projects would add approximately 7,108 new residents within 3,554 dwelling units in the project vicinity. Overall, these approved and proposed projects, when combined with the proposed project, would add 8,029 net new residents in the project vicinity, which would represent a residential population increase of 20.2 percent. In addition, the cumulative projects would add an estimated 2,154 new employees (including the 14 net new employees associated with the proposed project) within the 0.25-mile radius of the project site. Recreational facility use in the project area would most likely increase with the development of the proposed project, as well as the past, present, and reasonably foreseeable future projects identified in **Table 1**. However, in addition to the Brady Open Space proposed as part of the project, the SFRPD anticipates acquiring a 0.45-acre property for creation of another park in the project vicinity on the east side of 11th Street at Natoma Street, and the Planning Department determined in 2016 that the land acquisition is categorically exempt from CEQA and conforms with the *General Plan* (Case No. 2016-008708GPR). Therefore, new park facilities, in addition to those already existing in the project vicinity, would be available to the increased residential population in the area. Furthermore, it is not anticipated that this added population would increase the use of existing neighborhood and regional parks or other recreational facilities to such an extent that substantial physical deterioration of those facilities would occur, given that not all residents would necessarily use local parks and that other recreational opportunities are available citywide. The added residential population as a result of development of the proposed and cumulative projects also would not require the construction or expansion of recreational facilities, nor would it physically degrade existing recreational resources. Each project identified in **Table 1, Cumulative Projects in a 0.25-Mile Radius of Project Site**, p. 8, would be subject to compliance with the City's open space requirements, as defined in Section 135 of the *Planning Code*, regarding provision of public and/or private open space to partially meet the demand for recreational resources from future residents of those projects. Moreover, in June 2016, San Francisco voters approved Local Measure (Proposition) B, which extends until 2046 a funding set-aside in the City budget for SFRPD and also provides for annual increases through 2026–2027 in General Fund monies provided to SFRPD,

meaning that, going forward, SFRPD will have additional funding for programming and park maintenance.[105] For these reasons, when considered in combination with other past, present, or reasonably foreseeable future projects, the proposed project would not result in a cumulative impact on recreational facilities or resources and the impact would be ***less than significant***; therefore, no mitigation measures would be required.

Topic:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
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 project site is within an urban area that is served by utilities and service systems, including water, wastewater and storm water collection and treatment, and solid waste collection and disposal.

Impact UT-1: The proposed project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board, would not exceed the capacity of the wastewater treatment provider serving the project site, or require construction of new stormwater drainage facilities, wastewater treatment facilities, or expansion of existing facilities. (Less than Significant)

The project site is served by San Francisco's combined sewer system, which handles both sewage and stormwater runoff. The Southeast Water Pollution Control Plant provides wastewater and stormwater treatment and management for the east side of the city, including the project site. As described in Impact PH-1 in Topic 2, *Population and Housing*, the proposed project would generate 921 net new residents and 14 net new employees on the project site, which would increase the amount of wastewater generated at the project site by

[105] San Francisco Department of Elections, *June 7, 2016 Official Election Results*, last updated June 24, 2016. Available at http://www.sfelections.org/results/20160607/, accessed August 17, 2016.

approximately 62,908 gallons per day.[106] This increase would not be substantial and would represent only a 0.10 percent increase in the Southeast Water Pollution Control Plant's average daily treatment capacity of 60,000,000 gallons per day; therefore, the proposed project's projected demand in addition to the provider's existing commitment is expected to have adequate capacity.[107] The proposed project would incorporate water-efficient fixtures, as required by *California Code of Regulations* Title 24 and the San Francisco Green Building Code. Compliance with these regulations would reduce wastewater flows and the amount of potable water used for building functions. The incorporation of water-efficient fixtures into new development is also accounted for by the San Francisco Public Utilities Commission (SFPUC), because widespread adoption can lead to more-efficient use of existing capacity. The proposed project would also meet the wastewater pre-treatment requirements of the SFPUC, as required by the San Francisco Industrial Waste Ordinance in order to meet Regional Water Quality Control Board requirements (see discussion under Impact HY-1, in Topic 14, *Hydrology and Water Quality*) for additional stormwater management requirements).[108] Although the proposed project would add new residents and employees to the project site, this additional population is not considered substantial. Therefore, the incremental increase in the demand for wastewater would not require construction of new wastewater treatment facilities or expansion of existing facilities.

The project site is currently covered with impervious surfaces and the proposed project would not create any additional impervious surfaces. In addition, the proposed project would increase open space and landscaped areas on the project site. Therefore, the proposed project would not result in an increase in stormwater runoff. Compliance with the City's Stormwater Management Ordinance, adopted in 2010 and amended in 2016, and the 2016 Stormwater Management Requirements and Design Guidelines would require the proposed project to reduce the existing volume and rate of stormwater runoff discharged from the project site. For a project, such as the proposed 1629 Market Street Mixed-Use Project, that is on a site that is more than 50 percent impervious surface at present, that would create or replace more than 5,000 square feet of impervious surface, and that is located in the combined sewer system, the stormwater management approach must reduce the existing runoff flow rate and volume by 25 percent for a two-year 24-hour design storm. The Stormwater Management Requirements set forth a hierarchy of Best Management Practices (BMPs) that meet the stormwater runoff requirements. First priority BMPs involve reduction in stormwater runoff through approaches such as rainwater harvesting and reuse (e.g., for toilets and urinals and/or irrigation); infiltration through a rain garden, swale, trench, or basin; or through the use of permeable pavement or a green roof. Second priority BMPs include biotreatment approaches such as the use of flow-through planters or, for large sites, constructed wetlands. Third priority BMPs, only permitted under special circumstances, involve use of a filter to treat stormwater.

To achieve compliance with the Stormwater Management Requirements, the proposed project would implement and install appropriate stormwater management systems, such as Low Impact Design approaches, rainwater reuse, green roof, etc., that would manage stormwater on-site and limit demand on both collection system and wastewater facilities resulting from stormwater discharges. A Stormwater Control Plan for the project site would be designed for review and approval by the SFPUC. The Stormwater Control Plan would also include a maintenance agreement that must be signed by the project sponsor to ensure proper care of the necessary stormwater controls. Therefore, the proposed project and would not substantially increase the amount

[106] SFPUC Non-potable Water Calculator, *1629 Market Street*, September 12, 2016 (amended March 17, 2017).
[107] SFPUC Non-potable Water Calculator, *1629 Market Street*, September 12, 2016 (amended March 17, 2017).
[108] City and County of San Francisco, Ordinance No. 19-92, *San Francisco Municipal Code* (Public Works), Part II, Chapter X, Article 4.1 (amended), January 13, 1992.

of stormwater runoff to the extent that existing facilities would need to be expanded or new facilities would need to be constructed; as such, the impacts would be less than significant.

Overall, while the proposed project would add to sewage flows in the area, it would not cause collection treatment capacity of the sewer system in the City to be exceeded. The proposed project also would not exceed any applicable wastewater treatment requirements or otherwise conflict with Regional Water Quality Control Board requirements, and would not require the construction of new wastewater/stormwater treatment facilities or expansion of existing ones. The proposed project is not expected to result in a determination by the Southeast Water Pollution Control Plant that it has inadequate capacity to serve the proposed project's projected demand in addition to the provider's existing commitments. Therefore, the proposed project would not require the construction of new or expanded wastewater or stormwater collection, conveyance or treatment facilities that could have a significant impact on the environment and the impact would be ***less than significant***, and no mitigation measures are necessary.

Impact UT-2: SFPUC has sufficient water supply available to serve the project from existing entitlements and resources, and the proposed project would not require expansion or construction of new water supply resources or facilities. (Less than Significant)

The proposed project would add residential units, retail/restaurant, open space, and office/assembly uses to the project site, which would increase the demand for water on the site, but not in excess of amounts expected and provided for in the project area. The SFPUC currently provides an average of approximately 198.1 million gallons of water per day to 2.6 million users in Tuolumne, Alameda, Santa Clara, San Mateo, and San Francisco counties.[109] Based on the Water Supply Assessment prepared for the proposed project and reviewed and approved by the SFPUC, the proposed project's 921 net new residents and 14 net new employees would use an estimated 62,908 gallons per day (gpd) of water.[110] The SFPUC's *2015 Urban Water Management Plan for the City and County of San Francisco* uses 2040 growth projections to estimate future water demand.[111] The SFPUC estimates an additional 273.9 million gallons of water per day will be needed to meet future demand, and also assumes declining per-capita water usage due to continued improvements in efficiency.[112] Therefore, while the proposed project would incrementally increase the demand for water in San Francisco, the estimated increase in demand could be accommodated within anticipated water use and supply. Although the proposed project could be served by existing mains and no new or larger mains would be required, more than 11,000 feet of new water mains will be installed along Van Ness/South Van Ness Avenue as part of the Van Ness Avenue Improvement Project, which includes, and is sometimes referred to as the Van Ness Bus Rapid Transit (Van Ness BRT Project), which would serve the project site.[113] The proposed project would also be designed to incorporate water-conserving measures, such as low-flush toilets and urinals, as required by the San Francisco Green Building Code. The project site is not located within a designated recycled water use area, as defined in

[109] SFPUC, *2015 Urban Water Management Plan for the City and County of San Francisco*, June 2016, p. 4-3 and 4-12. Available at https://wuedata.water.ca.gov/public/uwmp_attachments/7184308707/FULL%20SFPUC%202015%20UWMP%20with%20Appendices_FINAL_June%202016.pdf, accessed March 17, 2017.
[110] SFPUC Non-potable Water Calculator, *1629 Market Street*, September 12, 2016 (amended March 17, 2017).
[111] SFPUC, *2015 Urban Water Management Plan for the City and County of San Francisco*, June 2016, Section 4.1.
[112] Ibid.
[113] San Francisco Municipal Transportation Agency, Van Ness Improvement Project. Available at https://www.sfmta.com/sites/default/files/projects/2016/VN_Newsltr_16.03_160823.pdf, accessed September 26, 2016.

the Recycled Water Ordinance 390-91 and 393-94; however, pursuant to the Non-potable Water Ordinance (Ordinance 109-15, approved July 2, 2015), the proposed project will be required to install a recycled water system and to use non-potable water (Rainwater, Graywater, Foundation Drainage, and/or treated Blackwater) for toilet and urinal flushing.[114] In addition, any new landscape proposed as part of the project would be required to be water efficient, per the Water Efficient Irrigation Ordinance. Since the proposed project's water demand could be accommodated by the existing and planned supply, no expansion or construction of new water supply resources or facilities would be required and the proposed project would result in ***less-than-significant*** water supply impacts. No mitigation measures are necessary.

Impact UT-3: The proposed project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs. (Less than Significant)

In September 2015, the City entered into a landfill disposal agreement with Recology, Inc. for disposal of all solid waste collected in San Francisco at the Recology Hay Road Landfill in Solano County for nine years or until 3.4 million tons have been disposed whichever occurs first. The City would have an option to renew the agreement for a period of six years or until an additional 1.6 million tons have been disposed, whichever occurs first.[115] The Recology Hay Road Landfill is permitted to accept up to 2,400 tons per day of solid waste; at that maximum rate, the landfill would have capacity to accommodate solid waste until approximately 2034. At present, the landfill receives an average of approximately 1,850 tons per day from all sources, with approximately 1,200 tons per day from San Francisco; at this rate, landfill closure would occur in 2041.[116] The City's contract with the Recology Hay Road Landfill is set to terminate in 2031 or when five million tons have been disposed, whichever occurs first. At that point, the City will either further extend the Recology Hay Road Landfill contract or find and entitle another landfill site. Therefore, the proposed project would be served by landfills with sufficient permitted capacity to accommodate its solid waste disposal needs, and would have a ***less-than-significant*** impact related to solid waste disposal, and no mitigation measures would be required.

Impact UT-4: The construction and operation of the proposed project would comply with all applicable statutes and regulations related to solid waste. (Less than Significant)

The California Integrated Waste Management Act of 1989 requires municipalities to adopt an Integrated Waste Management Plan (IWMP) to establish objectives, policies, and programs relative to waste disposal, management, source reduction, and recycling. Reports filed by the San Francisco Department of the Environment (DOE) showed that the City generated approximately 873,000 tons of waste material in 2000.[117] By 2010 that figure was decreased to approximately 455,000 tons. Waste diverted from landfills is defined as recycled or composted. San Francisco has a goal of 75 percent landfill diversion by 2010 and 100 percent by 2020.

[114] Graywater wastewater from bathtubs, showers, bathroom sinks, lavatories, clothes washing machines, laundry tubs, and the like. Blackwater is wastewater containing bodily or other biological wastes, such as from toilets, dishwashers, kitchen sinks, and utility sinks.

[115] San Francisco Planning Department, *Agreement for Disposal of San Francisco Municipal Solid Waste at Recology Hay Road Landfill in Solano County Final Negative Declaration*, Planning Department Case No. 2014.0653, May 21, 2015. Available at http://sfmea.sfplanning.org/2014.0653E_Revised_FND.pdf, accessed August 17, 2016.

[116] San Francisco Planning Department, *Agreement for Disposal of San Francisco Municipal Solid Waste at Recology Hay Road Landfill in Solano County Final Negative Declaration*, May 21, 2015.

[117] CalRecycle, *Disposal Reporting System (DRS): Jurisdiction Disposal and Alternative Daily Cover (ADC) Tons by Facility*, Information for San Francisco, years: 2000, 2010, and 2015; 2016. Available at http://www.calrecycle.ca.gov/lgcentral/Reports/DRS/Destination/JurDspFa.aspx, accessed August 18, 2016.

As of 2009, 78 percent of San Francisco's solid waste was being diverted from landfills, having met the 2010 diversion target.

San Francisco Ordinance 27-06 requires a minimum of 65 percent of all construction and demolition debris to be recycled and diverted from landfills. The *San Francisco Green Building Code* also requires certain projects to submit a recovery plan to the Department of the Environment demonstrating recovery or diversion of at least 75 percent of all demolition debris. Furthermore, the project would be required to comply with City's Ordinance 100-09, the Mandatory Recycling and Composting Ordinance, which requires everyone in San Francisco to separate their refuse into recyclables, compostables, and trash. The Recology Hay Road and Ostrom landfills are required to meet federal, state, and local solid waste regulations. The proposed project would comply with the solid waste disposal policies and regulations identified above and the project would have ***less-than-significant*** impact with respect to solid waste statutes and regulations, and no mitigation measures are necessary.

Impact C-UT-1: The proposed project, in combination with other past, present, or reasonably foreseeable projects would result in less-than-significant impact to utilities and service systems. (Less than Significant)

The cumulative development projects identified in **Table 1, Cumulative Projects in a 0.25-Mile Radius of Project Site**, p. 8, would incrementally increase demand on citywide utilities and service systems, such as water consumption, wastewater facilities, and solid waste services. As noted above, the SFPUC has accounted for such growth in its water demand and wastewater service projections, and the City has implemented various programs to achieve 100 percent landfill diversion by 2020. Nearby cumulative development projects would be subject to the same water conservation, wastewater discharge, recycling and composting, and construction demolition and debris ordinances applicable to the proposed project. Compliance with these ordinances would reduce the effects of nearby cumulative development projects to less-than-significant levels. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a cumulative impact on utilities or service systems and the impact would be ***less than significant***; therefore, no mitigation measures are necessary.

Topic:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
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 proposed project's impacts to parks and open spaces are discussed under Topic E.9, *Recreation*. Impacts on other public services are discussed below.

Impact PS-1: The proposed project would not result in an increase in demand for police protection, fire protection, schools, or other services to an extent that would result in substantial adverse physical impacts associated with the construction or alteration of governmental facilities. (Less than Significant)

Police Protection

The proposed project would result in more intensive use of the project site than currently exists, and thus would likely incrementally increase police service calls in the project area. Police protection is provided by the Southern Police Station located at 1251 Third Street, approximately 1.9 miles east of the project site.[118] Although the proposed project could increase the number of calls received by the San Francisco Police Department (SFPD) from the area, the increase in response demand would not be substantial in light of the existing demand for police protection services.[119] The Southern Station would be able to provide the necessary police services and crime prevention in the area. Meeting this additional service demand would not require the construction of new police facilities that could cause significant environmental impacts. Hence, the proposed project would have a ***less-than-significant*** impact related to the provision of police services, and no mitigation measures are necessary.

Fire Protection

The proposed project would result in more intensive use of the project site than currently exists, and thus, as with police service calls, would likely incrementally increase fire service calls in the project area. Fire stations located nearby include Station 36 at 109 Oak Street (at the corner of Oak and Franklin Streets, approximately two blocks north of the project site), Station 3, at 1067 Post Street (near the corner of Post and Polk Streets, approximately one mile north of the project site), and Station 1, at 935 Folsom Street (at Fifth Street, approximately one mile east of the project site). Although the proposed project would increase the number of calls received by the San Francisco Fire Department from the area, the increase in response demand would not be substantial in light of existing demand for fire protection services.

Furthermore, the proposed project would be required to comply with all applicable building and fire code requirements, which identify specific fire protection systems, including, but not limited to, the provision of state-mandated smoke alarms, fire alarm and sprinkler systems, fire extinguishers, required number and location of egress with appropriate distance separation, and emergency response notification systems. Since the proposed project would be required to comply with all applicable building and fire codes, and the proposed project would not result in a substantial demand for service and oversight to such an extent that new fire protection facilities would need to be constructed; therefore, the proposed project would have a ***less-than-significant*** impact, and no mitigation measures are necessary.

Schools

A decade-long decline in San Francisco Unified School District (SFUSD) enrollment ended in the 2008–2009 school year, and total enrollment in the SFUSD has increased to about 55,320 in the 2015–2016 school year, an

[118] San Francisco Police Department, *Police District Maps*. Available at http://sanfranciscopolice.org/police-district-maps, accessed August 18, 2016.
[119] San Francisco Police Department, *2014 Annual Report*, p. 113. Available at http://sanfranciscopolice.org/annual-reports, accessed August 18, 2016.

increase of approximately 2,287 students since 2010.[120] According to a 2015 SFUSD enrollment study, new market-rate units in San Francisco generate very few public school students.[121] In projecting enrollment through 2040, the study used a mix of enrollment factors for the Market & Octavia and Transbay Transit Center District Plans areas combined, and the student generation rate was 0.25 Kindergarten through 12th grade students per unit for inclusionary affordable housing and 0.10 students per unit for market-rate housing. The 107 residential units proposed for the Colton Street Affordable Housing building under the proposed project would be single resident occupancy units, which are not permitted to house families. The 477 residential units in Buildings A through D would include affordable units as set forth in a Development Agreement, which would govern the project and would provide at least as many affordable units as required to meet on-site inclusionary affordable housing requirements under *Planning Code* Section 415. A weighted average student generation rate for market-rate and affordable housing units would result in 0.12 students per unit for the proposed project. As such, the proposed project would result in an enrollment increase in the SFUSD of approximately 58 students.[122]

The proposed mix of office/assembly, retail/restaurant, open space, and residential uses would incrementally increase the number of school-aged children attending public schools in the project area by 58 students, as noted above. However, this increase would be anticipated to be accommodated by the SFUSD in the project area. Additionally, the proposed project would be assessed a per gross square foot school impact fee for the increase in residential, retail, and office space. Therefore, implementation of the proposed project would not necessitate the need for new school facilities or the expansion of existing school facilities and the impacts would be ***less than significant***. As such, no mitigation measures are necessary.

Other Government Services

The proposed project would incrementally increase demand for governmental services and facilities such as libraries; however, the proposed project would not be of such a magnitude that the demand could not be accommodated by existing facilities. Therefore, the proposed project would not necessitate the construction of additional facilities and would have a ***less-than-significant*** impact related to other governmental service facilities and no mitigation measures are necessary.

Impact C-PS-1: The proposed project, combined with past, present, and reasonably foreseeable future projects in the vicinity, would not have a substantial cumulative impact to public services. (Less than Significant)

The proposed project would not be expected to increase demand for public services beyond levels anticipated and planned for by public service providers. Additionally, future developments would be subject to *Planning Code* impact fee requirements, and no other proposed development in the project vicinity would contribute substantially to public services cumulative effects. For these reasons, the proposed project, in combination with

[120] San Francisco Unified School District. 2016. *SFUSD Facts at a Glance.* Available at http://www.sfusd.edu/en/assets/sfusd-staff/about-SFUSD/files/sfusd-facts-at-a-glance.pdf, accessed March 3, 2017.
[121] Lapkoff & Goblat Demographic Research, Inc., *Demographic Analyses and Enrollment Forecasts for the San Francisco Unified School District*, November 23, 2015, p. 33. Available at http://www.sfusd.edu/en/assets/sfusd-staff/about-SFUSD/files/demographic-analyses-enrollment-forecast.pdf, accessed August 18, 2016.
[122] This analysis assumes 14.5 percent of the proposed 477 residential units would be inclusionary affordable housing units, or 69 units. The remaining 408 residential units would be market-rate. With a student generation rate of 0.25 students per unit, the 69 inclusionary affordable housing units would generate 17 students. With a student generation rate of 0.10 students per unit, the 408 market-rate units would generate 41 students; therefore, the 477 residential units would generate a total of 58 students.

past, present, and reasonably foreseeable future projects in the project vicinity, would not create a cumulative impact on public services, and this impact would be ***less than significant***. No mitigation measures are necessary.

Topic:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
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?	☐	☐	☐	☐	☒

The proposed project is located in a developed area completely covered by impervious surfaces. The project area does not include riparian habitat or other sensitive natural communities as defined by the California Department of Fish and Wildlife and the United States Fish and Wildlife Service; therefore, Question 12(b) is not applicable to the proposed project. In addition, the project area does not contain any wetlands as defined by Section 404 of the Clean Water Act; therefore, Question 12(c) is not applicable to the proposed project. Moreover, the proposed project does not fall within any local, regional or state habitat conservation plans; therefore, Question 12(f) is not applicable to the proposed project.

Impact BI-1: The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species, riparian habitat or sensitive natural communities, and would not interfere substantially with any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. (Less than Significant)

The project site is entirely covered with impervious surfaces and does not provide habitat for any rare or endangered plant or animal species. Thus, the proposed project would not adversely affect or substantially diminish plant or animal habitats, including riparian or wetland habitat. The proposed project would not

interfere with any resident or migratory species, nor affect any rare, threatened or endangered species. The proposed project would not interfere with species movement or migratory corridors.

Migrating birds do pass through San Francisco. Nesting birds, their nests, and eggs are fully protected by *California Fish and Game Code* (Sections 3503, 3503.5) and the Federal Migratory Bird Treaty Act (MBTA). The proposed project would be subject to the MBTA, which would ensure that no impacts to nesting birds would occur as a result of the proposed project, as discussed further below.

The location, height, and material, particularly transparent or reflective glass, may present risks for birds as they travel along their migratory paths. The City has adopted guidelines to address this issue and provided regulations for bird-safe design within the city. *Planning Code*, Section 139, Standards for Bird-Safe Buildings, establishes building design standards to reduce avian mortality rates associated with bird strikes.[123] The project site is not located in an Urban Bird Refuge, so the standards concerning location-related hazards are not applicable to the proposed project.[124] The proposed project would comply with the building feature-related hazards standards of Section 139 by using bird-safe glazing treatment on 100 percent of any building feature-related hazards.

Overall, the proposed project would be subject to, and would comply with, City-adopted regulations for bird-safe buildings and federal and State migratory bird regulations; therefore, the proposed project would not interfere with the movement of native resident or wildlife species or with established native resident or migratory wildlife corridors, and the impact would be ***less than significant***. No mitigation measures are necessary.

Impact BI-2: The proposed project would not conflict with the City's local tree ordinance. (Less than Significant)

The City's Urban Forestry Ordinance, *Public Works Code* Sections 801 et seq., requires a permit from San Francisco Public Works (SFPW) to remove any protected trees. Protected trees include landmark trees, significant trees, or street trees located on private or public property anywhere within the territorial limits of the City and County of San Francisco. The designations are defined as follows:

- A landmark tree is designated by the Board of Supervisors following nomination of a tree by the Urban Forestry Council based on a written request from a property owner or the director of any City agency, or by the Board of Supervisors, Planning Commission, or Landmarks Preservation Advisory Board. The Urban Forestry Council determines whether a nominated tree meets the qualification for landmark designation by using established criteria set forth in Section 810(f)(4)(A)–(E) of the *Public Works Code*. Special permits are required to remove a landmark tree on private property or on City- owned property.
- A significant tree is defined either on property under the jurisdiction of the SFPW, or on privately-owned property with any portion of its trunk within 10 feet of the public right-of-way and that satisfies at least one of the following criteria: (a) diameter at breast height (DBH) in excess of 12 inches, (b) a

[123] San Francisco Planning Department, *Standards for Bird-Safe Buildings*, July 14, 2001. Available at http://208.121.200.84/ftp/files/publications_reports/bird_safe_bldgs/Standards%20for%20Bird%20Safe%20Buildings%20-%2011-30-11.pdf, accessed August 18, 2016.

[124] San Francisco Planning Department, *Urban Bird Refuge Map.* Available at http://www.sf-planning.org/ftp/files/publications_reports/library_of_cartography/Urban_Bird_Refuge_Poster.pdf, accessed August 18, 2016.

height in excess of 20 feet, or (c) a canopy in excess of 15 feet.[125] The removal of significant trees on privately-owned property is subject to the requirements for the removal of street trees. The Director of SFPW may authorize removal of a significant tree after only after factors such as size, age, species, visual and aesthetic characteristics, cultural and historic characteristics, or ecological characteristics have been considered (Section 810A(c)).

- Street trees are trees within the public right-of-way or on land within the jurisdiction of the SFPW. Their removal by abutting property owners requires a permit (Section 806(b)(3)).

There are 29 existing street trees along Market, Brady, and Colton Streets adjacent to the project site. As part of the proposed project, the existing street trees would be retained or replaced, and a permit would be obtained prior to any tree removal, per Section 806(b)(3) of the *Public Works Code*.

Tree removal activities could potentially disturb nesting birds that are protected under the *California Fish and Game Code* or the MBTA. For the purposes of CEQA, a project that has the potential to substantially reduce the habitat, restrict the range, or cause a population of a native bird species to drop below self-sustaining levels could be considered a potentially significant biological resource impact requiring mitigation.[126] Although removal of trees on the project site could have an adverse impact on nesting birds, compliance with the requirements of the *Fish and Game Code* and the MBTA would ensure that there would be no loss of active nests or bird mortality. The requirements include one or more of the following:

- Tree removal and pruning activities would be conducted outside bird nesting season (January 15–August 15) to the extent feasible;
- If tree removal activities are proposed during the breeding season (March through August), preconstruction surveys would be conducted by a qualified biologist within 15 days prior to the start of work from March through May, or 30 days prior to the start of work from June through August, to determine if any birds are nesting in or in the vicinity of any vegetation that is to be removed for the construction to be undertaken. If active nests are located during the preconstruction bird nesting survey, the project sponsor would contact the California Department of Fish and Wildlife for guidance on avoiding any adverse impacts on the nesting birds, such as establishing a construction-free buffer zone that would be maintained until the nestlings have fledged.

In addition, Section 806(d)(2) requires that for every 20 feet of property frontage along each street, one 24-inch box tree be planted, with any remaining fraction of 10 feet or more of frontage requiring an additional tree. The proposed project would consist of approximately 358 feet of frontage on Market Street, approximately 280 feet of frontage on Brady Street, approximately 165 feet of frontage on 12th Street, approximately 151 feet of frontage along the north side of Stevenson Street, and approximately 75 feet of frontage along the south side of Stevenson Street. The portions of the project site on the north and east side of Colton Street total approximately 137 feet of frontage, while the portion of the project site on the south side of Colton Street totals approximately 102 feet of frontage. The portion of the project site that fronts Colusa Place totals approximately 100 feet. Therefore, street frontage for the project site totals approximately 1,368 feet, which would require 68 street trees. The proposed project would comply with *Planning Code* Section 138.1(c)(1) by retaining or replacing the 29 existing trees along 12th Street, Market Street, Brady and Colton Street, and by planting an addition of about 39 trees, for a total of 68 street trees. The location of new street trees would be subject to constraints regarding the location of

[125] *Public Works Code*, Section 810A (a).
[126] *California Fish and Game Code* Section 3503; Section 681, Title 14, *California Code of Regulations*.

underground utilities. *Public Works Code* Section 806(d)(4) includes a provision that the Director may waive street tree requirements should planting a street tree interfere with pre-existing sub-surface features. However, for each required street tree that the Director waives, the project sponsor must pay an in-lieu fee to fulfill all or a portion of the street tree requirement, or provide alternative landscaping, comparable to or greater than the number of street trees waived. Therefore, the proposed project would comply with the *Planning Code* and the *Public Works Code*. Because the proposed project would not conflict with the City's local tree ordinance, this impact would be ***less than significant***, and no mitigation measures are necessary.

Impact C-BI-1: The proposed project, in combination with other past, present or reasonably foreseeable projects, would not result in cumulative impacts to biological resources. (Less than Significant)

Cumulative development projects noted in **Table 1, Cumulative Projects in a 0.25-Mile Radius of Project Site**, p. 8, would result in the intensification of land uses within a dense urban environment that does not include any candidate, sensitive, or special-status species, any riparian habitat, or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Cumulative development would add tall buildings that can injure or kill birds in the event of a collision. In addition, nearby cumulative development projects would result in the removal of existing street trees or other vegetation. However, nearby cumulative development projects would be subject to the MBTA, which protects special-status bird species, the *California Fish and Game Code*, as well as City bird-safe building and urban forestry ordinances applicable to the proposed project. As with the proposed project, compliance with these ordinances would reduce the effects of nearby cumulative development projects to less-than-significant levels.

In summary, as noted above, implementation of the proposed project in combination with other past, present, and reasonably foreseeable projects would not modify any natural habitat and would have no impact on any candidate, sensitive, or special-status species, any riparian habitat, or other sensitive natural community, and would not conflict with any local policy or ordinance protecting biological resources or an approved conservation plan. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to result in a significant cumulative impact related to biological resources and impacts would be ***less than significant***. Therefore, no mitigation measures are necessary.

Topic:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
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 the *California 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?	☐	☐	☐	☒	☐
g) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐	☐

The project site would be connected to the existing sewer system and would not require use of septic systems. Therefore, Question 13(e) would not be applicable to the project site.

This section describes the geology, soils, and seismicity characteristics of the project area as they relate to the proposed project. Responses in this section rely on the information and findings provided in the Preliminary Geotechnical Investigation prepared by Langan Treadwell Rollo for the project site, unless otherwise noted.[127] The geotechnical study relied on available geotechnical data from the surrounding area to develop conclusions and recommendations, including a limited field investigation at the project site. Based on the collected data, the project site is underlain by approximately one to 10 feet of loose- to medium-dense sandy fill that contains occasional debris. The fill is underlain by loose- to very-dense native sand, typically referred to as dune sand, which extends to a depth of about 15 to 27 feet below ground surface (bgs). The dune sand is underlain by the clayey sand, sandy clay, and silty clay of the marsh deposit. The marsh deposit varies in thickness from about five to 10 feet, and is loose to medium dense. Below the marsh deposit is medium- to very-dense sand, silty sand, clayey sand, and clayey silty sand referred to as the Colma formation. The Colma formation extends to at least a depth of approximately 194 feet, the maximum depth explored. The Colma formation is underlain by

[127] Langan Treadwell Rollo, *Preliminary Geotechnical Investigation, 1629 Market Street, San Francisco, California*, July 5, 2016.

residual soils and Franciscan Complex bedrock. Groundwater was encountered at the site at a depth of approximately 16 to 17.5 feet bgs.

The project site is also located above the BART tunnel that crosses beneath the central portion of the site with a bottom depth of approximately 85 feet bgs. The San Francisco Municipal Railway (Muni) tunnel is located approximately 35 feet north of the project site with a depth of approximately 36 feet bgs.[128] For these reasons, the proposed project would be subject to BART's *General Guidelines for Design and Construction Over or Adjacent to BART's Subway Structures*.[129] In accordance with these guidelines, the project site is located within the BART zone of influence (ZOI) and would be subject to review of the project plans and approval of a construction permit by BART engineering, as discussed below under Impact GE-3.

The proposed project is anticipated to be constructed on a mat foundation. Therefore, the proposed project would entail excavation to a maximum depth of approximately 30 feet to accommodate both the below-grade parking levels and foundation. The proposed project would require excavation of approximately 63,400 cubic yards; Phase 1 excavation would total up to approximately 39,700 cubic yards, and Phase 2 would total up to approximately 23,700 cubic yards. Because the soils beneath the project site consist of artificial fill, Dune sand, and marsh deposits to approximately the proposed depth of excavation, and because these soils may be unsuitable for supporting the proposed structures, soil improvement would likely be required to avoid the potential for soil liquefaction and to properly support the foundation slab. Soil improvement would likely be undertaken by a technique known as deep soil mixing (DSM), in which cement grout is pumped into and mixed with the native soil, essentially creating strengthened columns in the ground that can adequately support a foundation slab. Because of the presence of the BART tunnels beneath the site, DSM columns cannot be created atop the tunnels, and therefore the foundation slab would have to be constructed in a manner such that it could span the area above the BART tunnels between DSM columns on either side of the tunnels. Additionally, within the BART ZOI above the tunnels, the proposed project may not place additional weight atop the BART structures. Therefore, the building weight must be offset by excavation of the project's basement levels. BART would review the project's final geotechnical and geological hazards evaluation reports to ensure compliance with its guidelines for construction over its subway structures. The reports will include an engineering geology map, a site plan showing the location of subway structures, BART easements, a soil reworking plan, and the geological conclusion and recommendations.

Impact GE-1: The proposed project would not result in exposure of people and structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic ground-shaking, liquefaction, lateral spreading, or landslides. (Less than Significant)

With respect to potential rupture of a known earthquake fault, published data indicate that neither known active faults nor extensions of active faults exist beneath the project site. Therefore, the potential of surface rupture occurring at the site is very low and impacts are considered less than significant.

In terms of the potential for strong seismic ground shaking, the site is located within a 40-mile radius of several major active faults, including the San Andreas (7.5 miles), San Gregorio (11 miles), and Hayward (11 miles)

[128] San Francisco Municipal Railway (Muni) tunnel is a BART facility.
[129] BART. 2003. *General Guidelines for Design and Construction Over or Adjacent to BART's Subway Structures*. Available at https://www.bart.gov/sites/default/files/docs/Gen_Guide_Subway_062012.pdf, accessed April 28, 2017.

faults. According to the U.S. Geological Survey, the overall probability of a magnitude 6.7 or greater earthquake to occur in the San Francisco Bay Region during the next thirty years is 63 percent. Therefore, it is possible that a strong to very strong earthquake would affect the project during its lifetime. The severity of the event would depend on a number of conditions including distance to the epicenter, depth of movement, length of shaking, and the properties of underlying materials.

ABAG has classified the Modified Mercalli Intensity Shaking Severity Level of ground shaking in the proposed project vicinity due to an earthquake on the North San Andreas Fault as "VIII-Very Strong."[130] Very strong shaking would result in damage to some masonry buildings, fall of stucco and some masonry walls, fall of chimneys and elevated tanks, and shifting of unbolted wood frame structures off their foundations. In accordance with the *San Francisco Building Code* requirement, the geotechnical investigation analyzed the potential for strong seismic shaking and recommended that the proposed project seismic design be in accordance with the provisions of the 2013 *California Building Code*, such as appropriately anchoring roof coverings, ensuring that suspended ceilings are laterally supported by the ceiling grid, and ensuring the superstructure-to-foundation connection is capable of transmitting the design base shear and the overturning forces from the structure into the supporting soil.[131] With implementation of these recommendations, as incorporated into and required by the *San Francisco Building Code*, the impacts to the proposed project due to strong seismic ground shaking would be less than significant.[132]

Liquefaction and lateral spreading of soils can occur when ground shaking causes saturated soils to lose strength due to an increase in pore pressure. In terms of seismic-related ground failure, including liquefaction, the site is within a designated liquefaction hazard zone as shown on the California Geological Survey (CGS) seismic hazard zone map for the area titled State of California Seismic Hazard Zones, City and County of San Francisco, Official Map, dated November 17, 2000.[133] CGS provided recommendations for the content of site investigation reports within seismic hazard zones in Special Publication 117A, which recommends that at least one exploration point extend to a depth of at least 50 feet to evaluate liquefaction potential. Review of borings indicates that loose to medium dense sand is likely present both above and below the natural groundwater table in the site vicinity. Loose sand above the groundwater table may densify and loose to medium dense sand below the groundwater table may liquefy during strong ground shaking due to a seismic event on a nearby fault.

The geotechnical investigation tests showed that the sandy layers from the Colma formation were found at depths of 60 and 70 feet bgs in one boring and at a depth of approximately 35 feet in another. These sandy layers were determined to be relatively dense and unlikely to liquefy; however, an estimate of liquefaction-induced settlements of up to 2.5 inches was determined for the site in a major earthquake. Lateral spreading was also determined in the geotechnical investigation to have a low potential for occurring at the site. As noted above, the geotechnical investigation recommended that the proposed project seismic design be in accordance with the provisions of the 2013 *California Building Code* and Special Publication 117A. Implementation of these recommendations, as incorporated into and required by the *San Francisco Building Code*, would reduce any

[130] Association of Bay Area Governments, *Earthquake Hazard Map for San Francisco Scenario: Entire San Andreas Fault System*. Available at http://www.abag.ca.gov/cgi-bin/pickmapx.pl, accessed March 15, 2017.
[131] It should be noted that the proposed building must be built to the California Building Code standards in effect at the time of application.
[132] Langan Treadwell Rollo. Preliminary Geotechnical Investigation, 1629 Market Street, San Francisco, California, July 5, 2016.
[133] California Geologic Survey, *Seismic Hazard Zones, City and County of San Francisco, Official Map*, November 17, 2000.

potential impacts of seismic-related ground failure, including liquefaction, to a ***less-than-significant*** level. No mitigation measures are necessary.

With respect to landslides, based on the *General Plan*, the project site is relatively level and is not located within a mapped landslide zone.[134] The site is not within a designated earthquake-induced landslide zone as shown on the CGS seismic hazard zone map for the area. Therefore, the proposed project would have ***no impact*** with respect to potential for landslides and no mitigation measures are necessary.

Impact GE-2: The proposed project would not result in substantial loss of topsoil or erosion. (Less than Significant)

The project site is generally flat and entirely covered with impervious surfaces. The proposed project would not substantially change the general topography of the site or any unique geologic or physical features of the project site. The proposed project would require ground improvements that could include excavation to a depth of approximately 30 feet and removal of approximately 63,400 cubic yards of soil and debris, as well as deep soil mixing and construction of a mat foundation for the proposed building. Due to the project site size of approximately 97,617 square feet, or 2.2 acres, the project sponsor would be required to obtain a National Pollutant Discharge Elimination System (NPDES) General Construction Permit that would require the project sponsor and its contractor to implement BMPs that include erosion and sedimentation control measures, as required by the City and/or resources agencies, which would reduce short-term construction-related erosion impacts to ***less-than-significant*** levels. No mitigation measures are necessary.

Impact GE-3: The proposed project would be located on a geologic unit or soil that is unstable, or that could become unstable as a result of the proposed project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. (Less than Significant with Mitigation)

The area around the project site does not include hills or cut slopes likely to be subject to landslide. However, the project site is within a state designated seismic hazard zone for liquefaction. The state Seismic Hazards Mapping Act of 1990 (SHMA), *Public Resources Code* Sections 2690 to 2699.6, was enacted to identify and map seismic hazard zones in order for cities and counties to encourage land use management policies and regulations to reduce and mitigate seismic hazards to protect public safety. *Public Resources Code* Section 2697 requires that prior to approval of a project within a seismic hazard zone, cities and counties shall require a geotechnical report defining and delineating seismic hazard on the site. In conjunction with these provisions in the *Public Resources Code*, *California Code of Regulations* (CCR) Title 14, Section 3724, specifies that a project located in a state seismic hazard zone shall be approved only when the nature and severity of the seismic hazards at the site have been evaluated in a geotechnical report and appropriate mitigation measures have been proposed. The California Department of Conservation, California Geological Survey issued Special Publication 117A, *Guidelines for Evaluating and Mitigating Seismic Hazards in California* (2008), to provide considerations for earthquake hazard mitigation.

Pursuant to the SHMA, San Francisco Department of Building Inspection (DBI), the local permitting authority, must regulate certain development projects within the mapped hazard zones. For projects in a hazard zone such

[134] *San Francisco General Plan*, Community Safety Element, Map 4. Available at http://www.sf-planning.org/ftp/General_Plan/Community_Safety_Element_2012.pdf, accessed September 30, 2016.

as the proposed project, DBI requires that appropriate mitigation measures, if any, are incorporated into the development plans and made conditions of the building permit.

In addition, improvements proposed as part of the project would require the design of the proposed buildings to consider the foundations with regard to the BART tunnel below the site. According to the preliminary geotechnical investigation, the site can be developed as planned provided the geotechnical concerns identified in the study are addressed as indicated and summarized below. The project site is underlain by one to 10 feet of loose to medium dense sandy fill, which is underlain by marsh deposits and dune sand. As noted above, below the marsh deposit is dense to very dense, silty sand and clayey sand referred to as Colma formation. Groundwater is anticipated at the site at depths ranging from 16 to 17.5 feet bgs. The preliminary geotechnical investigation recommends soil improvements be made in areas where the foundation would be bearing on unsuitable soils. Deep soil mixing (DSM) would be used to treat soil in place with cement grout that mixes with the soil to create DSM columns that can support the proposed buildings. The construction of DSM columns, and soil dewatering or the construction of soil-cement shoring walls would stabilize the soil and allow it to support the proposed project. Absent proper precautions and application of appropriate engineering techniques, project construction could adversely affect subsurface soil conditions and could cause damage to BART facilities, which could result in a significant impact. Accordingly, **Mitigation Measure M-GE-3a, Design Approval and Construction Monitoring for BART Subway Structure**, would require that all proposed foundation design and site preparation recommendations adhere to BART guidelines.

During construction, temporary shoring would be necessary during ground improvements to prepare for the foundation. The geotechnical investigation included some general recommendations to be implemented during construction in order to prevent the dune sands from caving and to protect neighboring structures. Excavation activities will require the use of shoring and underpinning in accordance with the recommendations of the geotechnical report, the *San Francisco Building Code* requirements, the SHMA, as well as the BART engineering recommendations as stated in **Mitigation Measure M-GE-3a.** Implementation of Mitigation Measure M-GE-3a would reduce potential impacts on subsurface soil conditions and BART facilities to a ***less-than-significant*** level.

> **Mitigation Measure M-GE-3a – Design Approval and Construction Monitoring for BART Subway Structure.** Prior to issuance of the structural plan addendum to the site permit for the proposed project by DBI, the project sponsor shall submit such plans to BART for its review and approval to ensure that the plans comply with BART guidelines for the construction activity in the BART Zone of Influence (ZOI), including the *General Guidelines for Design and Construction Over or Adjacent to BART's Subway Structures*, and *Procedures for Permit and Plan Review*.
>
> The project sponsor and its structural engineer shall coordinate with BART to determine which of the following guidelines must be included in the plans to be submitted to BART for review:
>
> - Geologic Hazards Evaluation and Geotechnical Investigation reports, which shall include an engineering geology map, a site plan showing the location of subway structures and BART easement, a soil reworking plan, and the geological conclusion and recommendations;
> - Dewatering monitoring and recharging plans;
> - A vibration monitoring plan and/or movement and deformation monitoring plans for steel lined tunnels, including locations and details of instruments in subways;

- A foundation plan showing the anticipated total foundation loads;
- An excavation plan for area in the ZOI, showing excavation slope or shoring system; and
- A description of the procedures and control of the soil compaction operation.

The project sponsor and its consultant shall monitor the groundwater level in the BART ZOI, and piezometers shall be installed on the sidewalk adjacent to the site if requested by BART.

As noted above, groundwater is anticipated at depths ranging from 16 to 17.5 feet bgs. Because excavation would extend below this depth, dewatering would likely be required during construction. Should dewatering be necessary, the final geotechnical report would address the potential settlement and subsidence impacts of this dewatering. Based on this discussion, the final geotechnical report would determine whether or not a lateral movement and settlement survey should be done to monitor any movement or settlement of surrounding buildings, which could result in a significant impact. If a monitoring survey were recommended, **Mitigation Measure M-GE-3b, Monitoring of Adjacent Structures in the Event of Dewatering**, would require that this monitoring be undertaken and, if necessary, based on monitoring results, remedial action be taken. If dewatering were necessary, the project sponsor and its contractor would follow the geotechnical engineers' recommendations regarding dewatering to avoid settlement of adjacent streets, utilities, and buildings that could potentially occur as a result of dewatering. Implementation of **Mitigation Measure M-GE-3b** would reduce potential impacts of dewatering to a ***less-than-significant*** level.

Mitigation Measure M-GE-3b – Monitoring of Adjacent Structures in the Event of Dewatering. If recommended by the final geotechnical report, the project sponsor would retain a qualified professional to monitor potential settlement and subsidence at permanent structures within 50 feet of the project site. The monitoring shall include, but not be limited to, the following tasks prior to dewatering:

- Establish survey measurements of the exterior elevations of adjacent properties to monitor any movement or settlement of adjacent permanent structures during excavation;
- Photograph and/or video the exterior the relevant structures to document existing conditions prior to commencement of dewatering. The photographic and/or video survey shall be adequate in scope to provide a legally binding "before and after" comparison of the conditions of the adjacent permanent structures; and
- Install inclinometers and piezometers if necessary to monitor movement of the shoring system and to monitor groundwater levels, respectively, during excavation and construction.

Upon start of construction, the qualified professional shall perform the following tasks:

- Monitor the relevant structures weekly until dewatering and foundation construction and sealing work has been completed; and
- In the event that there is more than one-half inch of lateral movement, or one-quarter inch of vertical movement, at an adjacent permanent structure within 50 feet of the project site, the qualified individual shall immediately notify the adjacent property owner, the project sponsor's general contractor, the shoring and excavation subcontractor, and DBI, and the project sponsor shall instruct its contractor and subcontractor to stop work until such time that appropriate remedial steps have been completed.

San Francisco Building Code requirements would ensure that the project applicant include analysis of the potential for unstable soil impacts as part of the design-level geotechnical investigation prepared for the proposed project.

These recommendations and design plans would then be submitted for review and approval by BART engineering through implementation of **Mitigation Measure M-GE-3a**, while potential effects related to dewatering would be reduced to a less-than-significant level through Implementation of **Mitigation Measure M-GE-3b**; therefore, potential impacts of unstable soils would be ***less than significant with mitigation***.

Impact GE-4: The proposed project would not be located on expansive soil, as defined in the *California Building Code*, creating substantial risks to life or property. (Less than Significant)

Expansive soils expand and contract in response to changes in soil moisture, most notably when nearby surface soils change from saturated to a low-moisture content condition, and back again. The presence of expansive soils is typically determined based on site-specific data. Due to the low clay content within the dune sands, there would be a low likelihood for expansion at this project site. According to the geotechnical investigation for the proposed project, expansive soils were not encountered at the project site. Regardless, due to the *San Francisco Building Code* requirement that the project applicant include analysis of the potential for soil expansion impacts as part of the design-level geotechnical investigation prepared for the proposed project, potential impacts related to expansive soils would be ***less than significant***. No mitigation measures are necessary.

Impact GE-5: The proposed project would not substantially change the topography or any unique geologic or physical features of the site. (No Impact)

The existing project site is already developed with three buildings and surface parking lots. The proposed project would not substantially change the topography of the site. There are no unique geologic or physical features of the site. Therefore, ***no impact*** would occur to topographic or unique geologic or physical features, and no mitigation measures are necessary.

Impact GE-6: The proposed project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant with Mitigation)

Paleontological resources include fossilized remains or traces of animals, plants, and invertebrates, including their imprints, from a previous geologic period. Collecting localities and the geologic formations containing those localities are also considered paleontological resources as they represent a limited, non-renewable resource and once destroyed, cannot be replaced.

Paleontological resources are lithologically dependent; that is, deposition and preservation of paleontological resources are related to the lithologic unit in which they occur. If the rock types representing a deposition environment conducive to deposition and preservation of fossils are not favorable, fossils will not be present. Lithological units that may be fossiliferous include sedimentary formations.

The results of the geotechnical investigation indicate the project site is generally underlain by fill, which ranges in thickness from about one to 10 feet.[135] The fill consists of very loose to medium dense sand with occasional debris. The fill is underlain by dune sand, which extends to a depth of about 15 to 27 feet. Artificial fills do not contain paleontological resources and dune sands are originally derived from rocks, but have been altered, weathered, or reworked to a degree such that the discovery of intact fossils would be unlikely.

[135] Langan Treadwell Rollo, *Preliminary Geotechnical Investigation, 1629 Market Street, San Francisco, California*, July 5, 2016

The dune sand is underlain by the clayey sand, clayey silty sand, sandy clay, and silty clay of a marsh deposit. The marsh deposit varies in thickness from about five to 10 feet. Although plant and invertebrate fossil remains have been found in marsh deposits, these fossils are abundant and their occurrence would not be considered paleontologically significant.

Below the marsh deposit is medium dense to very dense sand, silty sand, clayey sand, and clayey silty sand of the Colma Formation. The Colma is between 21 and 28 feet below ground surface and extends to a depth of 194 feet, where explored. The Colma Formation has a high potential for paleontological resources.[136] Identified fossils include mammoth, bison, and ground sloth remains from various locations in San Francisco. Diatoms, trees, and pollen have also been reported from the Colma Formation. A Columbian mammoth was identified at the Cliff House Beach. Vertebrate fossils including parts of mammoths and bison have been found in the Colma Formation in San Francisco near the base of Telegraph Hill.[137] In addition, a mammoth tooth was discovered in the Colma Formation during excavation for the Transbay Transit Center in downtown San Francisco in 2012.[138]

The proposed project would entail excavation to a depth of approximately 30 feet to accommodate the below-grade basement levels and foundation. Excavation would extend into the Colma Formation. For paleontologically sensitive areas, the objective of implementing mitigation measures is to reduce adverse impacts on paleontological resources by recovering fossils and associated contextual data prior to and during ground-disturbing activities. Ground-disturbing activities as a result of the proposed project could expose and cause impacts on unknown paleontological resources, which would be a potentially significant impact. This impact would be reduced to a less-than-significant level with implementation of **Mitigation Measure M-GE-6, Inadvertent Discovery of Paleontological Resources**. This mitigation measure would reduce adverse effects on paleontological resources by recovering fossils and associated contextual data prior to and during ground-disturbing activities; therefore, potential impacts on paleontological resources would be ***less than significant with mitigation***.

> **Mitigation Measure M-GE-6 – Inadvertent Discovery of Paleontological Resources.** If potential vertebrate fossils are discovered by construction crews, all earthwork or other types of ground disturbance within 50 feet of the find shall stop immediately and the monitor shall notify the City. The fossil should be protected by an "exclusion zone" (an area approximately five feet around the discovery that is marked with caution tape to prevent damage to the fossil). Work shall not resume until a qualified professional paleontologist can assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the qualified paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the fossil. The qualified paleontologist may also propose modifications to the stop-work radius based on the nature of the find, site geology, and the activities occurring on the site. If treatment and salvage is required, recommendations shall be consistent with SVP's 2010 Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, and currently accepted scientific practice, and shall be subject to review and approval by the City. If required, treatment for fossil remains may include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection [e.g.,

[136] Society for Vertebrate Paleontology (SVP), *Standards and Guidelines*, News Bulletin Number 163, January 1995.
[137] Rodda, Peter U. and Nina Baghai, 1993. Late Pleistocene Vertebrates from Downtown San Francisco, *California. Journal of Paleontology*, Vol. 67, No. 6, pp. 1058–1063. Available at http://www.jstor.org/discover/10.2307/1306122?uid=3739560&uid=2129&uid=2&uid=70&uid=4&uid=3739256&sid=21101675124861, accessed November 12, 2014.
[138] Transbay Transit Center, Archaeology, 2014. Available at http://transbaycenter.org/project/archaeology, accessed February 25, 2014.

the University of California Museum of Paleontology], and may also include preparation of a report for publication describing the finds. The City shall ensure that information on the nature, location, and depth of all finds is readily available to the scientific community through university curation or other appropriate means.

Impact C-GE-1: The proposed project, in combination with other past, present or reasonably foreseeable projects, would not result in cumulative impacts related to geology, seismicity, or soils. (Less than Significant)

Geology and soils impacts are generally site-specific and localized. Past, present, and foreseeable cumulative projects could require various levels of excavation or cut-and-fill, which could affect local geologic conditions. The *San Francisco Building Code* regulates construction in the City and County of San Francisco, and all development projects would be required to comply with its requirements to ensure maximum feasible seismic safety and minimize geologic impacts. Site-specific mitigation measures would also be implemented as site conditions warrant to reduce any potential impacts from unstable soils, ground shaking, liquefaction, or lateral spreading. Cumulative projects identified in **Table 1, Cumulative Projects in a 0.25-Mile Radius of Project Site**, p. 8, would be subject to the same seismic safety standards and design review procedures applicable to the proposed project. Compliance with the seismic safety standards and the design review procedures would ensure that the effects from nearby cumulative projects would be reduced to less-than-significant levels. Therefore, in combination with other past, present or reasonably foreseeable projects, the proposed project would result in a ***less-than-significant*** cumulative impact, and no mitigation measures are necessary.

Topic:		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
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 of 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?	☐	☐	☒	☐	☐
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 project site is not located in an area identified as subject to seiche or potential inundation in the event of a levee, dam failure, or tsunami along the San Francisco coast, based on a 20-foot water level rise at the Golden Gate (Maps Five and Six of the Community Safety Element of the *San Francisco General Plan*). In addition, the developed area of the project site would not be subject to mudflow. Thus, checklist Question 14(j) does not apply. The project site is not located within a 100-year flood hazard area designated on the City's interim floodplain map, and would not place housing or structures within a 100-year flood hazard area that would impede or redirect flood flows.[139] Therefore, Questions 14(g) and 14(h) also are not applicable.

[139] FEMA Preliminary Flood Insurance Rate Map, November 12, 2015. Available at http://sfgsa.org/sites/default/files/Document/SF_NE.pdf, accessed August 23, 2016.

Impact HY-1: The proposed project would not violate any water quality standards or waste discharge requirements, or otherwise substantially degrade water quality. (Less than Significant)

As discussed under Topic 10, *Utilities and Service Systems*, wastewater and stormwater from the project site would continue to flow into the City's combined stormwater and sewer system and would be treated to the standards contained in the City's National Pollutant Discharge Elimination System (NPDES) Permit for the Southeast Water Pollution Control Plant, prior to discharge into the San Francisco Bay. Treatment would be provided pursuant to the effluent discharge standards contained in the City's NPDES permit for the plant. Additionally, as new construction, the proposed project would be required to meet the standards for stormwater management identified in the San Francisco Stormwater Management Ordinance and meet the SFPUC stormwater management requirements per the 2016 Stormwater Management Requirements and Design Guidelines.

The project sponsor would be required to submit, and have approved by the SFPUC, a Stormwater Control Plan that complies with the City's 2016 Stormwater Management Requirements and Design Guidelines using a variety of BMPs. As described under Topic 10, *Utilities and Service Systems*, for the proposed project, the stormwater management approach must reduce the existing runoff flow rate and volume by 25 percent for a two-year 24-hour design storm through employment of a hierarchy of BMPs set forth in the Stormwater Management Requirements. Therefore, the proposed project would not substantially degrade water quality and water quality standards or waste discharge requirements would not be violated. Thus, the proposed project would have a ***less-than-significant*** impact on water quality resources, and no mitigation measures are necessary.

Impact HY-2: The proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or lowering of the local groundwater table. (Less than Significant)

The project site is currently entirely covered in impervious surfaces; therefore, the proposed project would not increase the amount of impervious surface and would not result in any substantial change in infiltration or runoff on the project site. As noted above, groundwater was encountered between 16 and 17.5 feet bgs during the geotechnical investigation. The proposed project would necessitate excavation to a maximum depth of approximately 30 feet for construction of the foundation and below-grade parking. If groundwater were encountered on-site, then temporary dewatering activities would be necessary. The Bureau of Systems Planning, Environment, and Compliance of the SFPUC must be notified of projects necessitating dewatering. The SFPUC may require water analysis before discharge. The proposed project would be required to obtain a Batch Wastewater Discharge Permit from the SFPUC Wastewater Enterprise Collection System Division prior to any dewatering activities. Groundwater encountered during construction of the proposed project would be subject to requirements of *Public Works Code* Article 4.1, Industrial Waste, requiring that groundwater meet specified water quality standards before it may be discharged into the sewer system. These measures would ensure protection of water quality during construction of the proposed project. In addition, the proposed project would not extract any underlying groundwater supplies. Therefore, groundwater resources would not be substantially degraded or depleted, and the proposed project would not substantially interfere with groundwater recharge. Thus, the proposed project would have a ***less-than-significant*** impact on groundwater, and no mitigation measures are necessary.

Impact HY-3: The proposed project would not 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 substantial erosion, siltation, or flooding on- or off-site. (Less than Significant)

The project site is currently covered with impervious surfaces and no streams or creeks occur on the project site. Impervious surfaces at the site would not substantially change as part of the proposed project and drainage patterns would remain generally the same. The proposed project would incrementally reduce the amount of impervious surface currently located on the project site through implementation of Low Impact Development and other measures identified in the Stormwater Management Ordinance, which also requires that the project decrease stormwater runoff. In particular, since the project site is within the Combined Sewer area and the site has an existing imperviousness of greater than 50 percent, the proposed project would be required to decrease the stormwater runoff rate and volume by 25 percent from pre-development conditions for two-year 24-hour design storm. Therefore, the proposed project would not be expected to result in substantial erosion or flooding associated with changes in drainage patterns, and potential to result in erosion or flooding would have a ***less-than-significant*** impact, and no mitigation measures are necessary.

Impact HY-4: The proposed project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. (Less than Significant)

During construction and operation of the proposed project, all wastewater and stormwater runoff from the project site would be treated at the Southeast Water Pollution Control Plant. As noted above, treatment would be provided pursuant to the effluent discharge standards contained in the City's NPDES permit for the plant. During construction and operation, the proposed project would be required to comply with all local wastewater discharge, stormwater runoff, and water quality requirements, including the 2016 San Francisco Stormwater Management Requirements and Design Guidelines, described above under Impact HY-1, and the Stormwater Management Ordinance. The Stormwater Management Requirements and Design Guidelines would ensure that stormwater runoff generated by the proposed project would be managed on-site to reduce the existing runoff flow rate and volume by 25 percent for a two-year 24-hour design storm, such that the project would not contribute additional peak volumes of polluted runoff to the City's stormwater infrastructure. The Stormwater Management Ordinance would ensure that the proposed project implements and installs appropriate stormwater management systems that retain runoff on site, promote stormwater reuse, and limit site discharges from entering the City's combined stormwater/sewer system. Therefore, the proposed project would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, and this impact would be ***less than significant***, and no mitigation measures are necessary.

Impact HY-5: The proposed project would not expose people or structures to a significant risk of loss, injury, or death involving flooding. (Less than Significant)

The City and County of San Francisco is a participant in the National Flood Insurance Program (NFIP). As a condition of participating in the NFIP, the City has adopted and enforces a Floodplain Management Ordinance intended to reduce the risk of damage from flooding in the City. The Floodplain Management Ordinance governs construction in flood-prone areas and designates the City Administrator's Office as the City's

Floodplain Administrator.[140] The project site is not located within a Special Flood Hazard Area identified on San Francisco's Interim Floodplain Map, nor is it adjacent to a shoreline that could be affected by sea-level rise.[141]

The proposed project is not located an area identified as being prone to flooding hazards because of the depth of sewer lines relative to the ground surface elevation of the properties they serve.[142] The proposed project also would not exacerbate flooding conditions such that people or structures would be exposed to a significant risk from future flooding, because it would not increase the amount of impervious surface, increase the volume of stormwater runoff, or change drainage patterns. Therefore, the proposed project would have a ***less-than-significant*** impact on flooding, and no mitigation measures are necessary.

Impact C-HY-1: The proposed project, in combination with other past, present, or reasonably foreseeable projects, would result in less-than-significant cumulative impacts to hydrology and water quality. (Less than Significant)

As stated above, the proposed project would result in no impacts or less-than-significant impacts related to water quality, groundwater levels, alteration of drainage patterns, capacity of drainage infrastructure, 100-year flood zones, failure of dams or levees, and seiche, tsunami, and mudflows. The proposed project would be required to adhere to existing drainage control requirements that address water quality and quantity similar to that of other nearby current and future projects. Because other development projects would be required to follow drainage, dewatering and water quality regulations, similar to the proposed project, peak stormwater drainage rates and volumes for the design storm would gradually decrease over time with new development, meaning that no substantial cumulative effects with respect to drainage patterns, water quality, stormwater runoff, or stormwater capacity of the combined sewer system would occur. San Francisco's limited use of groundwater would preclude any cumulative effects to groundwater levels, and the proposed project would not contribute to any cumulative effects with respect to groundwater. In general, 100-year flood zones, failure of dams or levees, and seiche, tsunami, and mudflows are not substantive issues in San Francisco such that any cumulative significant impacts would be anticipated, and the proposed project would not contribute to any such cumulative effects. Thus, the proposed project would not result in cumulative hydrology and water quality impacts and the impact would be ***less than significant***. No mitigation measures are necessary.

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[140] *San Francisco Administrative Code*, Chapter 2A, Article XX, Sections 2A.280 through 2A.285. Available at http://library.amlegal.com/nxt/gateway.dll/California/planning/planningcode?f=templates$fn=default.htm$3.0$vid=amlegal:sanfrancisco_ca$sync=1, accessed August 23, 2016.

[141] City and County of San Francisco, San Francisco Interim Floodplain Map, Northeast. Preliminary, November 12, 2015. Available at http://sfgsa.org/sites/default/files/Document/SF_NE.pdf.

[142] San Francisco Planning Department, *Planning Director Bulletin No. 4: Review of Projects in Areas Prone to Flooding*, April 2007. Available at http://www.sf-planning.org/ftp/files/publications_reports/DB_04_Flood_Zones.pdf, accessed August 23, 2016.

Topic:		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
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 project site is not located within an airport land use plan area or in the vicinity of a private airstrip. Therefore, Questions 15(e) and 15(f) are not applicable.

Impact HZ-1: The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. (Less than Significant)

Construction activities would require the use of limited quantities of hazardous materials such as fuels, oils, solvents, paints, and other common construction materials. The City would require the project sponsor and its contractor to implement best management practices (BMPs) as part of their grading permit requirements that would include hazardous materials management measures, which would reduce short-term construction-related transport, use and disposal of hazardous materials to less-than-significant levels.

Once constructed, the project would likely result in use of common types of hazardous materials typically associated with retail/restaurant, office, and residential uses, such as cleaning products and disinfectants. These products are labeled to inform users of their potential risks and to instruct them in appropriate handling procedures. However, most of these materials are consumed through use, resulting in relatively little waste. Businesses are required by law to ensure employee safety by identifying hazardous materials in the workplace, providing safety information to workers who handle hazardous materials, and adequately training workers. For these reasons, hazardous materials used during project operation would not pose any substantial public

health or safety hazards resulting from routine use, transport, or disposal of hazardous materials. Thus, the project would result in ***less-than-significant*** impacts related to the use of hazardous materials and no mitigation measures are necessary.

Impact HZ-2: The proposed project would not result in a significant hazard to the public or the environment through reasonably foreseeable conditions involving the release of hazardous materials into the environment. (Less than Significant)

The project site is located in an area of San Francisco governed by *San Francisco Health Code* Article 22A, also known as the Maher Ordinance, which is administered and overseen by the Department of Public Health (DPH).[143] The project would disturb more than 50 cubic yards of soil. Therefore, the project is subject to the Maher Ordinance. 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 Phase I would determine the potential for site contamination and level of exposure risk associated with the project. Based on that information, the project sponsor may be required to conduct soil and/or groundwater sampling and analysis. Where such analysis reveals the presence of hazardous substances in excess of state or federal standards, the project sponsor is required to submit a site mitigation plan (SMP) to DPH or other appropriate state or federal agency(ies), and to remediate any site contamination in accordance with an approved SMP prior to the issuance of any building permit.

In compliance with the Maher Ordinance, the project sponsor has submitted a Maher Application to DPH and a Phase I ESA has been prepared to assess the potential for site contamination.[144] The Phase I ESA included (1) a reconnaissance-level site visit to look for evidence of the release(s) of hazardous materials and petroleum products; (2) inquiries by telephone, visit, online databases, and /or written correspondence to past owners, operators, occupants, and regulatory agencies regarding building or environmental permits, environmental violations, incidents, and/or status of enforcement actions at the project site; (3) review of local, state, and federal records pertinent to a Phase I ESA; (4) review of relevant documents and maps regarding local geologic and hydrogeological conditions; and (5) review of historical documents including aerial photographs and topographical maps.

According to historic sources, previous land uses at the site have included numerous industrial and commercial operations. In 1889, the site was developed with multiple structures, a portion of which included a "wood and coal depot." The 1913 Sanborn Map shows Dolan Wrecking and Construction Company covering 20 12th Street and 1601, 1605, and 1615 Market Street. The remainder of the properties had lumber storage, a printing shop, a cyclery, and an enameling shop fronting Market Street. A plumbing supply shop and junk yard was located on the corner of Market and Brady Streets. Eagle Laundry was located at 53 Colton Drive, with what is speculated to be six above ground storage tanks (ASTs). Other uses over the years included an auto wrecking shop, a used car market with an auto repair facility, a wire and iron works shop, a steel fabrication and welding shop, a furniture factory, electric fixtures factory, and other light industrial, as well as residential land uses. In 1990, a 3,000-gallon steel gasoline-containing underground storage tank was recorded as being removed from the site.

[143] San Francisco Planning Department, "Expanded Maher Area" Map. Available at http://www.sf-planning.org/ftp/files/publications_reports/library_of_cartography/Maher%20Map.pdf, accessed August 23, 2016.
[144] Langan Treadwell Rollo, *Phase I Environmental Site Assessment, 53 and 76 Colton Street, 41 Brady Street, 1601–1605, 1613, 1615–1617, 1621–1629, and 1637 Market Street, 20 12th Street, and 1125 Stevenson Street, San Francisco, CA*, February 24, 2016.

No observed evidence of any significant staining, spillage, and/or ponded liquids or unconfined solids was discovered on the project site during site reconnaissance. The following recognized environmental conditions were identified in the Phase I assessment:

- The long term historical industrial use of the site with limited investigation;
- The former presence of a 3,000-gallon underground storage tank used for storage of gasoline;
- The presence of fill materials across the site;
- Six historical ASTs at the site with unknown history of use or potential leaks/spills; and
- Numerous historical dry-cleaning facilities located in close proximity to the site.

As such, the Phase I concluded that these recognized environmental conditions indicate a potential for hazardous materials and petroleum hydrocarbons to be present in subsurface materials. The Phase I investigation satisfies the site history requirements of Article 22A. Following review of the Phase I, DPH has determined that, in accordance with the requirements of Article 22A, the project applicant must undertake characterization of soil and/or groundwater beneath the project site prior to the start of excavation, to include collection and laboratory analysis of subsurface materials to identify the potential presence of legacy contaminants. This characterization would be undertaken pursuant to a Site Characterization Work Plan that must be submitted to DPH for review and approval prior to the start of the investigation.[145]

Based on the results of the required Site Characterization Work Plan, Article 22A could require that a SMP be implemented for the proposed project to identify proper handling and disposal of site soils. Additionally, the SMP would provide guidance on how to manage groundwater during dewatering, if required. The Department of Public Health would review the Phase I Environmental Site Assessment and Phase II Investigation and make a final determination as to the necessity of a Work Plan for Soil and Groundwater Characterization and, if determined necessary, a SMP, in accordance with *Health Code* Article 22A. Compliance with the requirements of the *Health Code* would ensure that effects related to contaminated soil and/or groundwater would be ***less than significant***, and no mitigation measures are necessary.

Asbestos-Containing Materials

The project site is occupied by buildings that were constructed prior to the mainstream use of asbestos-containing materials (ACMs); however, this does not preclude their potential presence. While the Phase I ESA did not sample building materials for ACMs, based on the dates of construction and renovation of buildings on the project site, ACMs may be present in building materials that could become airborne as a result of demolition disturbance.[146]

The California Department of Toxic Substance Control considers asbestos hazardous and removal is required. Asbestos-containing materials must be removed in accordance with local and state regulations, BAAQMD, the California Occupational Safety and Health Administration (Cal OSHA), and California Department of Health Services requirements. This includes materials that could be disturbed by the proposed demolition and construction activities.

[145] Stephanie K.J. Cushing, San Francisco Department of Public Health, letter to Strada Brady LLC, March 5, 2017.
[146] Langan Treadwell Rollo, *Phase I Environmental Site Assessment, 53 and 76 Colton Street, 41 Brady Street, 1601–1605, 1613, 1615–1617, 1621–1629, and 1637 Market Street, 20 12th Street, and 1125 Stevenson Street, San Francisco, CA*, February 24, 2016.

Specifically, *California Health and Safety Code* Section 19827.5 requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The California legislature vests the BAAQMD with the authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and the BAAQMD is to be notified 10 days in advance of any proposed demolition or abatement work. Any asbestos-containing material disturbance at the project site would be subject to the requirements of BAAQMD Regulation 11, Rule 2: Hazardous Materials—Asbestos Demolition, Renovation, and Manufacturing. The local office of Cal OSHA must also be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow state regulations contained in Title 8 of *California Code of Regulations* Section 1529 and Sections 341.6 through 341.14, where there is asbestos related work involving 100 square feet or more of asbestos-containing material. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services. The contractor and hauler of the material are required to file a Hazardous Waste Manifest that details the hauling of the material from the site and the disposal of it. Pursuant to California law, DBI would not issue the required permit until the applicant has complied with the requirements described above.

These regulations and procedures already established as part of the building permit review process would ensure that any potential impacts due to asbestos would be reduced to a ***less-than-significant*** level. Therefore, no mitigation measures are necessary.

Lead-Based Paint

Similar to ACMs, lead-based paint was not sampled for the Phase I ESA and may be present in all buildings on the project site.[147] Work that could result in disturbance of lead paint must comply with *San Francisco Building Code* Section 3426, Work Practices for Lead-Based Paint on Pre-1979 Buildings and Steel Structures. Where there is any work that may disturb or remove lead paint on the exterior of any building built prior to 1979, Section 3426 requires specific notification and work standards, and identifies prohibited work methods and penalties. (The reader may be familiar with notices commonly placed on residential and other buildings in San Francisco that are undergoing re-painting. These notices are generally affixed to a drape that covers all or portions of a building and are a required part of the Section 3426 notification procedure.)

Section 3426 applies to the exterior of all buildings or steel structures on which original construction was completed prior to 1979 (which are assumed to have lead-based paint on their surfaces, unless demonstrated otherwise through laboratory analysis), and to the interior of residential buildings, hotels, and child care centers. The ordinance contains performance standards, including establishment of containment barriers, at least as effective at protecting human health and the environment as those in the U.S. Department of Housing and Urban Development Guidelines (the most recent Guidelines for Evaluation and Control of Lead-Based Paint Hazards) and identifies prohibited practices that may not be used in disturbances or removal of lead-based paint. Any person performing work subject to the ordinance shall, to the maximum extent possible, protect the ground from contamination during exterior work; protect floors and other horizontal surfaces from work debris during interior work; and make all reasonable efforts to prevent migration of lead paint contaminants beyond containment barriers during the course of the work. Clean-up standards require the removal of visible work debris, including the use of a High Efficiency Particulate Air Filter (HEPA) vacuum following interior work.

[147] Ibid, p. 5.

The ordinance also includes notification requirements and requirements for signs. Prior to the commencement of work, the responsible party must provide written notice to the Director of DBI, of the address and location of the project; the scope of work, including specific location within the site; methods and tools to be used; the approximate age of the structure; anticipated job start and completion dates for the work; whether the building is residential or nonresidential, owner-occupied or rental property; the dates by which the responsible party has fulfilled or will fulfill any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager number of the party who will perform the work. Further notice requirements include a Posted Sign notifying the public of restricted access to the work area, a Notice to Residential Occupants, Availability of Pamphlet related to protection from lead in the home, and Notice of Early Commencement of Work (by Owner, Requested by Tenant), and Notice of Lead Contaminated Dust or Soil, if applicable. Section 3426 contains provisions regarding inspection and sampling for compliance by DBI, as well as enforcement, and describes penalties for non-compliance with the requirements of the ordinance.

Demolition would also be subject to the Cal OSHA Lead in Construction Standard (8 CCR Section 1532.1). This standard requires development and implementation of a lead compliance plan when materials containing lead would be disturbed during construction. The plan must describe activities that could emit lead, methods that will be used to comply with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. Cal/OSHA would require 24-hour notification if more than 100 square feet of materials containing lead would be disturbed.

Implementation of procedures required by *Building Code* Section 3426 and the Lead in Construction Standard would ensure that potential impacts of demolition or renovation of structures with lead-based paint would be ***less than significant***, and no mitigation measures are necessary.

Other Hazardous Building Materials

Other hazardous building materials that could be present include fluorescent light ballasts that could contain polychlorinated biphenyl (PCBs) or diethylhexyl phthalate (DEHP), and switches, thermostats, and fluorescent light tubes that could contain mercury vapors. Disruption of these materials could pose health threats for construction workers if not properly disposed of, a potentially significant impact. Each of these materials is subject to federal and/or state regulation to ensure that they are properly handled during removal and disposal of prior to the start of building demolition or renovation. PCBs have been prohibited in most uses since 1978, although some electrical transformers still in use today use oils that contain PCBs. However, disposal of PCBs is regulated at both the federal level (the Toxic Substances Control Act, U.S. Code, Title 15, Chapter 53; and implementing regulations in 40 Code of Federal Regulations [CFR] 761) and at the state level (22 *California Code of Regulations* [CCR] 66261.24), and DEHP is covered under federal regulations (40 CFR 261.33). Disposal of these materials as hazardous waste must be in compliance with applicable laws and regulations and may involve incineration or other treatment or disposal in an approved chemical waste landfill. Mercury is regulated as a hazardous waste under 22 CCR 66262.11 and 22 CCR 66273.4 and its disposal as hazardous waste under 22 CCR 66261.50. Because they are considered a hazardous waste, all fluorescent lamps and mercury-containing switches and thermostats must be recycled or taken to a handler of universal waste. Compliance with the existing legal and regulatory framework noted here would ensure that potential impacts of exposure to these hazardous building materials would be ***less than significant***, and no mitigation measures are required.

Based on mandatory compliance with existing laws and regulatory requirements and the information and conclusions from the Phase I, the proposed project would not result in a significant hazard to the public or environment from contaminated soil and/or groundwater, asbestos, lead-based paint, or other hazardous building materials, and the proposed project would result in a ***less-than-significant*** impact with respect to these hazards.

Impact HZ-3: The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. (Less than Significant)

The only schools located within 0.25 mile of the project site are the LePort Montessori preschool, located approximately 1,100 feet to the northeast of the project site at 50 Fell Street, and the International High School, located approximately 500 feet north of the site at 150 Oak Street. The proposed project would not store, handle, or dispose of significant quantities of hazardous materials and would not otherwise include any uses that would include emissions of hazardous substances. Any hazardous materials currently on the site, such as asbestos, lead-based paint, PCBs, and DEHP, would be removed during or prior to demolition of the existing building and prior to project construction, and would be handled in compliance with applicable laws and regulations, as described above. With adherence to these regulations, there would be no potential for such materials to affect the nearest schools. Thus, the proposed project would have a ***less-than-significant*** impact related to hazardous emissions or materials within 0.25 mile of a school, and no mitigation measures are necessary.

Impact HZ-4: The proposed project is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. (Less than Significant)

According to the Phase I report, the project site was listed by the SFDPH-LOP (DPH Environmental Health Section Local Oversight Program) for the removal of a 3,000-gallon steel underground storage tank. Two soils samples were collected and analyzed by a laboratory, however no regulatory action was found in the record. As noted above, the project site is subject to *Health Code* Article 22A and would require further subsurface investigation for legacy contaminants prior to commencement of construction. Compliance with the requirements of the *Health Code* would ensure that any hazardous materials or wastes that are present in subsurface soils, groundwater, or soil vapor would be identified and remediated through implementation of a Site Mitigation Plan, if necessary, and any further recommendations from the Phase II investigation efforts. As a result, the proposed project would have a ***less-than-significant*** impact, and no mitigation measures are necessary.

Impact HZ-5: The proposed project would not expose people or structures to a significant risk of loss, injury or death involving fires, nor interfere with the implementation of an emergency response plan. (Less than Significant)

San Francisco ensures fire safety primarily through provisions of the *Building* and *Fire Codes*. Final building plans are reviewed by the San Francisco Fire Department (as well as DBI), to ensure conformance with these provisions. In this way, potential fire hazards, including those associated with hydrant water pressures and emergency access, would be addressed during the permit review process.

Implementation of the proposed project could contribute incrementally to congested traffic conditions in the immediate vicinity in the event of an emergency evacuation. However, because the proposed project would be located within a dense urban setting, it is expected that traffic would be dispersed within the existing street grid

such that there would be no significant adverse effects on nearby traffic conditions. Therefore, the proposed project would not impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan and this impact would be ***less than significant***. No mitigation measures are necessary.

Impact C-HZ-1: The proposed project, in combination with other past, present, or reasonably foreseeable projects would not result in cumulative impacts related to hazards and hazardous materials. (Less than Significant)

Impacts from hazardous materials are generally site-specific and typically do not result in cumulative impacts. Any hazards at nearby sites would be subject to the same safety or remediation requirements discussed for the proposed project above, which would reduce any hazard effects to less-than-significant levels. As such, the proposed project, in combination with other past, present, or reasonably foreseeable projects would not result in cumulative impacts related to hazardous materials and the impact would be ***less than significant***. No mitigation measures are necessary.

Topic:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
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?	☐	☐	☐	☐	☒
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?	☐	☐	☒	☐	☐

All land in the City of San Francisco, including the project site, is designated by the CGS as Mineral Resource Zone (MRZ) Four under the Surface Mining and Reclamation Act of 1975. The MRZ-4 designation indicates that adequate information does not exist to assign the area to any other MRZ; thus, the area is not one designated to have significant mineral deposits.[148] The project site has previously been developed, and future evaluations of the presence of minerals at this site would therefore not be affected by the proposed project.[149] Further, the development and operation of the proposed project would not have an impact on any off-site operational mineral resource recovery sites. Therefore, Questions 16(a) and 16(b) are not applicable to the proposed project.

[148] California Department of Conservation, Division of Mines and Geology, *Special Report 146, Parts I and II (1986)* and *DMG Open File Report 96 03 (1996)*. Available at http://www.conservation.ca.gov/cgs/minerals/mlc/Pages/index.aspx, accessed August 18, 2016.

[149] The Civic Center Hotel was built in 1915, the UA Local 38 building was built in 1923 and extensively remodeled in 1964, and the Lesser Brothers Building was built in 1925.

Impact ME-1: The proposed project would not encourage activities that would result in the use of large amounts of fuel, water, or energy, or use these resources in a wasteful manner. (Less than Significant)

The proposed project would add new residential, retail/restaurant, and office and assembly uses, and an increased intensity of uses to the project site, although not to an extent that would exceed anticipated growth in the area. As new buildings in San Francisco, the proposed project would be subject to the energy conservation standards included in the *San Francisco Green Building Code* that require the project to meet a number of conservation standards, including installation of water efficient fixtures and energy efficient appliances, and the proposed project would provide features that encourage alternative modes of transportation, such as bicycle racks and car-share parking spaces. Documentation showing compliance with the *San Francisco Green Building Code* would be submitted with the application of the building permits, and would be enforced by the DBI. In addition, the proposed project would be required to comply with *California Code of Regulations* Title 24, which regulates energy consumption for the heating, cooling, ventilation, and lighting of residential and nonresidential buildings and is enforced by the DBI. Compliance with Title 24 and the San Francisco Green Building Code would ensure reduction in the use of fuel, water, and energy by the proposed project.

In addition, San Francisco has a lower vehicle miles traveled (VMT) ratio than the Bay Area region as a whole. The transportation analysis zone in which the project site is located (TAZ 578) has between 40 and 78 percent fewer daily VMT than the Bay Area regional average. Furthermore, the following transportation-related aspects of the proposed project would discourage single-occupancy vehicle trips: proximity to transit, bicycle storage, and a Transportation Demand Management (TDM) Plan with strategies to discourage the use of automobiles and to encourage transit and other modes of transportation. Because the proposed project is an infill mixed-use development in a transit-rich area, the proposed project's vehicle trips and associated fuel use would not constitute wasteful use of energy and therefore would be consistent with the Plan Bay Area land use strategy, which seeks to reduce per capita VMT.

Therefore, the proposed project would not result in the use of large amounts of fuel, water, or energy, or result in the use of these resources in a wasteful manner, and effects related to the use of these resources would be ***less than significant***. No mitigation measures are necessary.

Impact C-ME-1: The proposed project, in combination with other past, present or reasonably foreseeable projects, would not result in a cumulative impact on mineral and energy resources. (Less than Significant)

No known minerals exist in the project site or in the vicinity, as all of the City of San Francisco falls within MRZ-4, as described above; therefore, no adverse impacts would ensue with respect to mineral resources and the proposed project would not contribute to any cumulative impact on mineral resources. In addition, the cumulative development projects identified in **Table 1, Cumulative Projects in a 0.25-Mile Radius of Project Site**, p. 8, would be required by the DBI to conform to Title 24 and the *San Francisco Green Building Code* regarding minimizing the use of large amounts of fuel, water, or energy by, for instance, installing energy efficient appliances and water efficient fixtures, which would preclude cumulative significant impacts on fuel, water, or energy. While statewide efforts are being made to increase power supply and to encourage energy conservation, the demand for energy created by the proposed project would be insubstantial in the context of the total demand within San Francisco and the state, and would not require a major expansion of power facilities. The City also plans to reduce GHG emissions to 25 percent below 1990 levels by 2017, and ultimately reduce GHG emissions to 80 percent below 1990 levels by 2050, which would be achieved through a number of

different strategies, including energy efficiency. Thus, the proposed project combined with cumulative projects would not have an adverse impact on energy resources. As such, the proposed project, in combination with other past, present or reasonably foreseeable projects, would result in a ***less-than-significant*** cumulative impact on fuel, water, and energy resources, and no mitigation measures are necessary.

Topic:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
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?	☐	☐	☐	☐	☒
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 project site is located within an urbanized area of San Francisco. No land in San Francisco County has been designated by the California Department of Conservation's Farmland Mapping and Monitoring Program as agricultural land. Because the project site does not contain agricultural uses and is not zoned for such uses, the proposed project would not require the conversion of any land designated as prime farmland, unique farmland, or Farmland of Statewide Importance to non-agricultural use. The proposed project would not conflict with any existing agricultural zoning or Williamson Act contracts.[150] No land in San Francisco is designated as forest land or timberland by the State Public Resource Code. Therefore, the proposed project would not conflict with zoning for forest land, cause a loss of forest land, or convert forest land to a different use. For these reasons, Questions 17(a), 17(b), 17(c), 17(d), and 17(e) are not applicable to the proposed project.

[150] California Department of Conservation, *California Important Farmland: 1984–2014*, updated 2015. Available at http://maps.conservation.ca.gov/dlrp/ciftimeseries/, accessed August 18, 2016; San Francisco is identified as "Urban and Built-Up Land" according to this map.

Topic:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
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?	☒	☐	☐	☐	☐

The foregoing analysis identifies potentially significant impacts to cultural resources and transportation and circulation, both of which have been further analyzed in the DEIR to which this IS is attached.

A. As discussed in the various topics in this Initial Study, the proposed project is anticipated to have less-than-significant impacts on most of the environmental topics discussed in this Initial Study, with implementation of mitigation measures, where identified. The proposed project, however, could have potentially significant impacts related to cultural resources and transportation and circulation. These impacts are further discussed in the DEIR.

B. The proposed project in combination with the past, present and foreseeable projects as described in Section E, *Evaluation of Environmental Effects*, would not result in cumulative impacts to land use, population and housing, cultural resources (archeological resources, human remains, and tribal cultural resources), 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. However, the proposed project in combination with the past, present, and foreseeable projects could result in cumulative impacts to historic architectural resources and transportation and circulation, which are further analyzed in the DEIR.

C. As discussed above, the proposed project has the potential to result in significant impacts with respect to historic architectural resources and transportation and circulation, which could adversely affect human beings. The DEIR assesses these topics and identifies mitigation measures where applicable.

F. Mitigation Measures

The following mitigation measures have been identified to reduce potentially significant impacts resulting from the proposed project to less-than-significant levels within the Initial Study. Other potentially significant impacts pertaining to cultural resources and transportation and circulation are fully analyzed in the DEIR, and mitigation measures have been identified for those topics. The project sponsor has agreed to implement all mitigation and improvement measures identified in the Initial Study.

> **Mitigation Measure M-CR-6 – Archeological Testing.** Based on a reasonable presumption that archeological resources may be present within the project area, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of an archeological consultant from the rotational Department Qualified Archeological Consultants List (QACL) maintained by the Planning Department archeologist. The project sponsor shall contact the Department archeologist to obtain the names and contact information for the next three archeological consultants on the QACL. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Section 15064.5(a) and (c).
>
> *Consultation with Descendant Communities:* On discovery of an archeological site[151] associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group, an appropriate representative[152] of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to offer recommendations to the ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Final Archeological Resources Report shall be provided to the representative of the descendant group.
>
> *Archeological Testing Program.* The archeological consultant shall prepare and submit to the ERO for review and approval an archeological testing plan (ATP). The archeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project,

[151] The term "archeological site" is intended here to minimally include any archeological deposit, feature, burial, or evidence of burial.

[152] An "appropriate representative" of the descendant group is here defined to mean, in the case of Native Americans, any individual listed in the current Native American Contact List for the City and County of San Francisco maintained by the California Native American Heritage Commission and in the case of the Overseas Chinese, the Chinese Historical Society of America. An appropriate representative of other descendant groups should be determined in consultation with the Department archeologist.

the testing method to be used, and the locations recommended for testing. The purpose of the archeological testing program will be to determine to the extent possible the presence or absence of archeological resources and to identify and to evaluate whether any archeological resource encountered on the site constitutes an historical resource under CEQA.

At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the ERO. If based on the archeological testing program the archeological consultant finds that significant archeological resources may be present, the ERO in consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or an archeological data recovery program. No archeological data recovery shall be undertaken without the prior approval of the ERO or the Planning Department archeologist. If the ERO determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

A. The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or

B. A data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

Archeological Monitoring Program. If the ERO in consultation with the archeological consultant determines that an archeological monitoring program shall be implemented the archeological monitoring program shall minimally include the following provisions:

- The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils- disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, site remediation, etc., shall require archeological monitoring because of the risk these activities pose to potential archeological resources and to their depositional context;

- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;

- The archeological monitor(s) shall be present on the project area according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;

- The archeological monitor shall record and be authorized to collect soil samples and artefactual/ecofactual material as warranted for analysis;

- If an intact archeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/construction activities and equipment until the deposit is evaluated. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall make a reasonable effort to assess the identity,

integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO.

Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO.

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

If required, the scope of the ADRP shall include the following elements:

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

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

Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound, one unbound and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of

Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

Mitigation Measure M-CR-7 – Inadvertent Discovery of Human Remains. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and the ERO, 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) (*Public Resources Code* Section 5097.98). The archeological consultant, project sponsor, ERO, and MLD shall have up to but not beyond six days of discovery to make all reasonable efforts to develop an agreement for the treatment of human remains and associated or unassociated funerary objects with appropriate dignity (CEQA Guidelines Section 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. Nothing in existing State regulations or in this mitigation measure compels the project sponsor and the ERO to accept recommendations of an MLD. The archeological consultant shall retain possession of any Native American human remains and associated or unassociated burial objects until completion of any scientific analyses of the human remains or objects as specified in the treatment agreement if such as agreement has been made or, otherwise, as determined by the archeological consultant and the ERO.

Mitigation Measure M-CR-8 – Tribal Cultural Resources Interpretive Program. If the ERO determines that a significant archeological resource is present, and if in consultation with the affiliated Native American tribal representatives, the ERO determines that the resource constitutes a tribal cultural resource (TCR) and that the resource could be adversely affected by the proposed project, the proposed project shall be redesigned so as to avoid any adverse effect on the significant tribal cultural resource, if feasible.

If the Environmental Review Officer (ERO), in consultation with the affiliated Native American tribal representatives and the Project Sponsor, determines that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option, the Project Sponsor shall implement an interpretive program of the TCR in consultation with affiliated tribal representatives. An interpretive plan produced in consultation with the ERO and affiliated tribal representatives, at a minimum, and approved by the ERO would be required to guide the interpretive program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, artifacts displays and interpretation, and educational panels or other informational displays.

Mitigation Measure M-NO-1 – Acoustical Assessment of Mechanical, Electrical, and Plumbing (MEP) Equipment. Prior to issuance of the Architectural and MEP Addendum, the project sponsor shall submit an Acoustical Assessment that analyzes the potential noise impact to adjacent receptors from mechanical equipment and identifies acoustical treatments such as enclosures, acoustical louvers or baffling, as necessary, to achieve a 45 dB interior performance standard resulting from noise generated

by mechanical, electrical, and plumbing equipment systems when locations and specifications of such systems are identified in the engineering plans.

Mitigation Measure M-NO-2 – Construction Noise Reduction. Incorporate the following practices into the construction contract agreement documents to be implemented by the construction contractor:

- Conduct noise monitoring at the beginning of major construction phases (e.g., demolition, excavation) to determine the need and the effectiveness of noise-attenuation measures. Measures needed to reduce activity that exceeds 86 dB at a distance of 50 feet or 73 dBA L_{eq} at the property line shall include plywood barriers, suspended construction blankets, or other screening devices to break line of sight to noise-sensitive receivers;
- 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;
- Notify the City and neighbors in advance of the schedule for each major phase of construction and expected loud activities;
- Construction activity shall be limited to the hours of 7:00 a.m. to 8:00 p.m. per San Francisco Police Code Article 29. Construction outside of these hours shall be approved through a development permit based on a site-specific construction noise mitigation plan and a finding by the Director of Building Inspection that the construction noise mitigation plan is adequate to prevent noise disturbance of affected residential uses;
- When feasible, select "quiet" construction methods and equipment (e.g., improved mufflers, use of intake silencers, engine enclosures);
- Locate stationary equipment, material stockpiles, and vehicle staging areas as far as practicable from all identified sensitive receptors. Avoid placing stationary noise generating equipment (e.g., generators, compressors) within noise-sensitive buffer areas (measured at 20 feet) from immediately adjacent neighbors;
- All construction equipment is required to be in good working order and mufflers are required to be inspected proper functionality;
- Prohibit unnecessary idling of equipment and engines;
- During Phase 2 of construction, stationary equipment should be located internal to the project to the extent feasible to allow for the shielding provided by the Phase 1 buildings;
- Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used where feasible; this could achieve a reduction of five dBA. Quieter procedures, such as use of drills rather than impact tools, shall be used where feasible; and
- The project sponsor shall designate a point of contact to respond to noise complaints. The point of contact must have the authority to modify construction noise-generating activities to ensure compliance with the measures above and with the San Francisco Noise Ordinance.

Mitigation Measure M-AQ-3 – Construction Air Quality. The project sponsor or the project sponsor's Contractor shall comply with the following:

A. *Engine Requirements.*

1. Electric construction equipment used during the Phase 1 construction period shall include air compressors, concrete/industrial saws, signal boards, pumps, cement and mortar mixers, and stationary cranes. Electric construction equipment used during the Phase 2 construction period shall include air compressors, concrete/industrial saws, signal boards, pumps, cement and mortar mixers, and stationary cranes.

2. 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.

3. Where access to alternative sources of power is reasonably available, portable diesel engines shall be prohibited.

4. 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.

5. The Contractor shall require that construction workers and equipment 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), and that no air quality significance threshold used in this Initial Study would be exceeded.

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 or not commercially available; 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 seeking a waiver, the Contractor must use the next cleanest piece of off-road equipment, according to Table M-AQ-3a-3, and submit documentation showing that no air quality significance threshold used in this Initial Study would be exceeded. No waivers shall be granted if an air quality significance threshold would be exceeded by doing so.

TABLE M-AQ-3A-3 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. Within six months of completion of construction activity, 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.

Mitigation Measure M-GE-3a – Design Approval and Construction Monitoring for BART Subway Structure. Prior to issuance of the structural plan addendum to the site permit for the proposed project by DBI, the project sponsor shall submit such plans to BART for its review and approval to ensure that the plans comply with BART guidelines for the construction activity in the BART Zone of Influence (ZOI), including the *General Guidelines for Design and Construction Over or Adjacent to BART's Subway Structures*, and *Procedures for Permit and Plan Review*.

The project sponsor and its structural engineer shall coordinate with BART to determine which of the following guidelines must be included in the plans to be submitted to BART for review:

- Geologic Hazards Evaluation and Geotechnical Investigation reports, which shall include an engineering geology map, a site plan showing the location of subway structures and BART easement, a soil reworking plan, and the geological conclusion and recommendations;
- Dewatering monitoring and recharging plans;
- A vibration monitoring plan and/or movement and deformation monitoring plans for steel lined tunnels, including locations and details of instruments in subways;
- A foundation plan showing the anticipated total foundation loads;
- An excavation plan for area in the ZOI, showing excavation slope or shoring system; and
- A description of the procedures and control of the soil compaction operation.

The project sponsor and its consultant shall monitor the groundwater level in the BART ZOI, and piezometers shall be installed on the sidewalk adjacent to the site if requested by BART.

Mitigation Measure M-GE-3b – Monitoring of Adjacent Structures in the Event of Dewatering. If recommended by the final geotechnical report, the project sponsor would retain a qualified professional to monitor potential settlement and subsidence at permanent structures within 50 feet of the project site. The monitoring shall include, but not be limited to, the following tasks prior to dewatering:

- Establish survey measurements of the exterior elevations of adjacent properties to monitor any movement or settlement of adjacent permanent structures during excavation;
- Photograph and/or video the exterior the relevant structures to document existing conditions prior to commencement of dewatering. The photographic and/or video survey shall be adequate in scope to provide a legally binding "before and after" comparison of the conditions of the adjacent permanent structures; and
- Install inclinometers and piezometers if necessary to monitor movement of the shoring system and to monitor groundwater levels, respectively, during excavation and construction.

Upon start of construction, the qualified professional shall perform the following tasks:

- Monitor the relevant structures weekly until dewatering and foundation construction and sealing work has been completed; and
- In the event that there is more than one-half inch of lateral movement, or one-quarter inch of vertical movement, at an adjacent permanent structure within 50 feet of the project site, the qualified individual shall immediately notify the adjacent property owner, the project sponsor's general contractor, the shoring and excavation subcontractor, and DBI, and the project sponsor shall instruct its contractor and subcontractor to stop work until such time that appropriate remedial steps have been completed.

Mitigation Measure M-GE-6 – Inadvertent Discovery of Paleontological Resources. If potential vertebrate fossils are discovered by construction crews, all earthwork or other types of ground disturbance within 50 feet of the find shall stop immediately and the monitor shall notify the City. The fossil should be protected by an "exclusion zone" (an area approximately five feet around the discovery

that is marked with caution tape to prevent damage to the fossil). Work shall not resume until a qualified professional paleontologist can assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the qualified paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the fossil. The qualified paleontologist may also propose modifications to the stop-work radius based on the nature of the find, site geology, and the activities occurring on the site. If treatment and salvage is required, recommendations shall be consistent with SVP's 2010 Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, and currently accepted scientific practice, and shall be subject to review and approval by the City. If required, treatment for fossil remains may include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection [e.g., the University of California Museum of Paleontology], and may also include preparation of a report for publication describing the finds. The City shall ensure that information on the nature, location, and depth of all finds is readily available to the scientific community through university curation or other appropriate means.

G. Public Notice and Comment

On February 8, 2017, the Planning Department mailed a Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping Meeting to property owners within 300 feet of the project site, tenants, and other potentially interested parties. In addition, the Planning Department held a public scoping meeting on Wednesday, March 1, 2017 to receive input on the scope of the environmental review for this project. Five comment letters were received.[153] During the NOP review and comment period, a total of five comment letters, comment cards, and emails were submitted to the Planning Department and seven speakers provided oral comments at the public scoping session. Topics raised in the written and oral comments include potential construction-related noise, air quality, and vehicle circulation impacts; potential loading impacts; parking-related impacts; potential noise impacts from the proposed project in tandem with cumulative development; other transportation-related impacts with regard to emergency vehicle access and pedestrian safety during construction; potential shadow impacts on parks; effects on "Mission butterfly" habitat on the roof of a nearby building due to shadow and wind impacts; and potential flooding during rain events. The topics raised in the comment letters have either been addressed in this Initial Study, and in the DEIR to which this IS is attached, as appropriate.

[153] The public scoping meeting was held at the American Red Cross of the Bay Area located at 1663 Market Street, San Francisco, CA 94103. A transcript of the proceedings is available as part of the Case file.

H. Determination

On the basis of this Initial Study:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find that the proposed project MAY have a significant effect on the environment, and an environmental impact report is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.

5/10/17
DATE

Lisa M. Gibson
Environmental Review Officer
for
John Rahaim
Director of Planning

I. Initial Study Preparers

SAN FRANCISCO PLANNING DEPARTMENT

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Appendix B
Notice of Preparation (NOP) for Case No. 2015-005848ENV

ESA

SAN FRANCISCO
PLANNING DEPARTMENT

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Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping Meeting

Date:	February 8, 2017
Case No.:	**2015-005848ENV**
Project Title:	**1629 Market Street Mixed-Use Project**
Zoning:	NCT-3 (Moderate Scale Neighborhood Commercial Transit District) and P (Public) Zoning Districts 40-X & 85-X Height and Bulk Districts
Block/Lot:	3505/001, 007, 008, 027, 028, 029, 031, 031A, 032, 032A, 033, 033A, 034, 035
Lot Size:	97,617 square feet (2.2 acres)
Project Sponsor:	Strada Brady, LLC William Goodman, 314.276.0707
Lead Agency:	San Francisco Planning Department
Staff Contact:	Debra Dwyer – 415.575.9031 debra.dwyer@sfgov.org

INTRODUCTION

This notice provides a summary description of the proposed project; identifies environmental issues anticipated to be analyzed in the Initial Study (IS) and Environmental Impact Report (EIR); and provides the time, date, and location of the public scoping meeting (see page 21 for information on the public scoping meeting). The comments received during the public scoping process will be considered during the preparation of the IS and EIR for this project.

PROJECT SUMMARY

The project sponsor, Strada Brady, LLC, proposes a mixed-use project fronting on Market Street between Brady and 12th Streets. The proposed project would demolish the existing United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry (UA) Local 38 building, located at 1621 Market Street, demolish the majority of the Lesser Brothers Building, located at 1629–1637 Market Street, rehabilitate the Civic Center Hotel, located at 1601 Market Street, for residential and retail/restaurant uses, and demolish the 242-space surface parking lots on the project site. The proposed project would construct a new four-story, 58-foot-tall, 27,300-square-foot UA Local 38 building, as well as a 10-story, 85-foot-tall, 187,100-square-foot addition to the Lesser Brothers Building at the corner of Brady and Market Streets containing 198 residential units and 6,600 square feet of ground-floor retail/restaurant space.[1,2] A 10-story, 85-foot-tall, 118,300-square-

[1] Square footages presented for the proposed project are approximate.

[2] Building heights for the existing buildings and the proposed project do not include rooftop mechanical penthouses. In accordance with *Planning Code* Section 260(b)(1)(B), elevator, stair, and mechanical penthouses would be a maximum of 16 feet in height above the roof line.

foot residential building containing 136 residential units and 2,500 square feet of ground-floor retail/restaurant would be constructed on Market Street between the new UA Local 38 building and the mixed-use building at the corner of Brady and Market Streets. A nine-story, 85-foot-tall, 74,700-square-foot residential building containing 78 residential units would be constructed to the east of the Brady Open Space at the end of Colton Street. The five-story, 55-foot-tall Civic Center Hotel would be rehabilitated to contain 65 residential units and 4,000 square feet of ground-floor retail/restaurant, and a new six-story, 68-foot-tall, 50,900-square-foot Colton Street Affordable Housing building containing up to 107 affordable units would be constructed south of Colton Street as part of the proposed project. The proposed project would construct the new 18,300-square-foot Brady Open Space at the northeast corner of Brady and Colton Streets. In addition, the proposed project would include an approximately 30-foot-deep, two-level, below-grade garage with up to 316 parking spaces accessible from Brady and Stevenson Streets. Overall, the proposed project would include construction of 498,100 square feet of residential use, 27,300 square feet of union facility use, 13,000 square feet of ground-floor retail/restaurant use, and 31,600 square feet of publicly-accessible and residential open space.

PROJECT LOCATION AND SITE CHARACTERISTICS

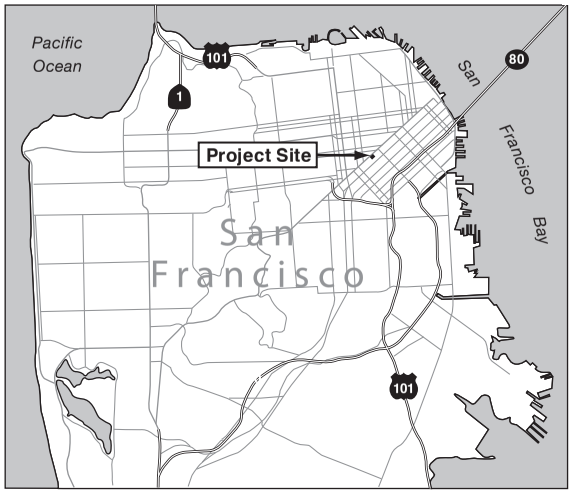
The approximately 97,617-square-foot (2.2-acre) project site (Assessor's Block 3505, Lots 001, 007, 008, 027, 028, 029, 031, 031A, 032, 032A, 033, 033A, 034, and 035) is on the block bounded by Market, 12th, Otis, and Brady Streets within the boundaries of San Francisco's Market & Octavia Area Plan, an area plan of the *San Francisco General Plan* (*General Plan*). The project site includes a Bay Area Rapid Transit District (BART)-owned parcel that contains a ventilation structure for the below-grade BART tunnel. Stevenson Street, perpendicular to 12th Street, separates Lots 007 and 008 from the lots to the north fronting on Market Street (Lots 001, 033, 033A). Colton Street, perpendicular to Brady Street, turns south into Colusa Place in the middle of the block, then west into Chase Court and wraps around Lots 027 and 028 (see **Figure 1**).

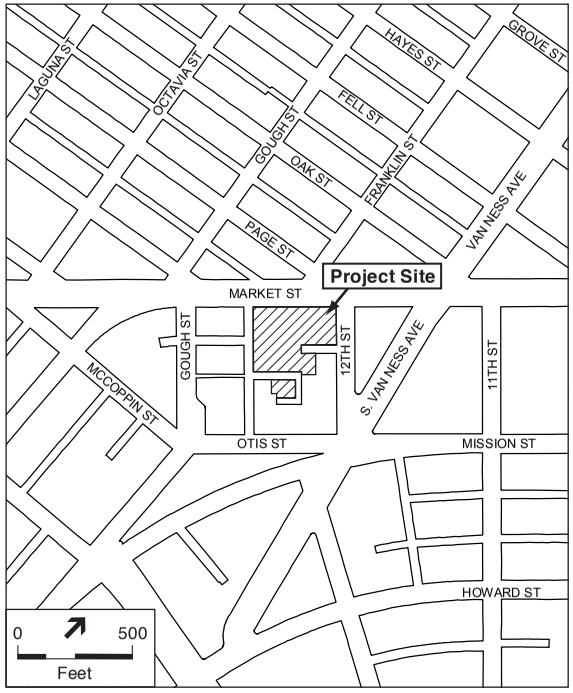
The project site is primarily located within the NCT-3 (Moderate-Scale Neighborhood Commercial Transit District) Zoning District. However, the southwestern portion of the site north of Colton Street, occupying approximately 20,119 square feet, is in a P (Public) Zoning District. The P Zoning District is designated in the Market & Octavia Area Plan as the location for a planned open space, referred to as the Brady Open Space. The portions of the project site to the north and east of the planned Brady Open Space are located within an 85-X height and bulk district, while the portion to the south is located within a 40-X height and bulk district.[3]

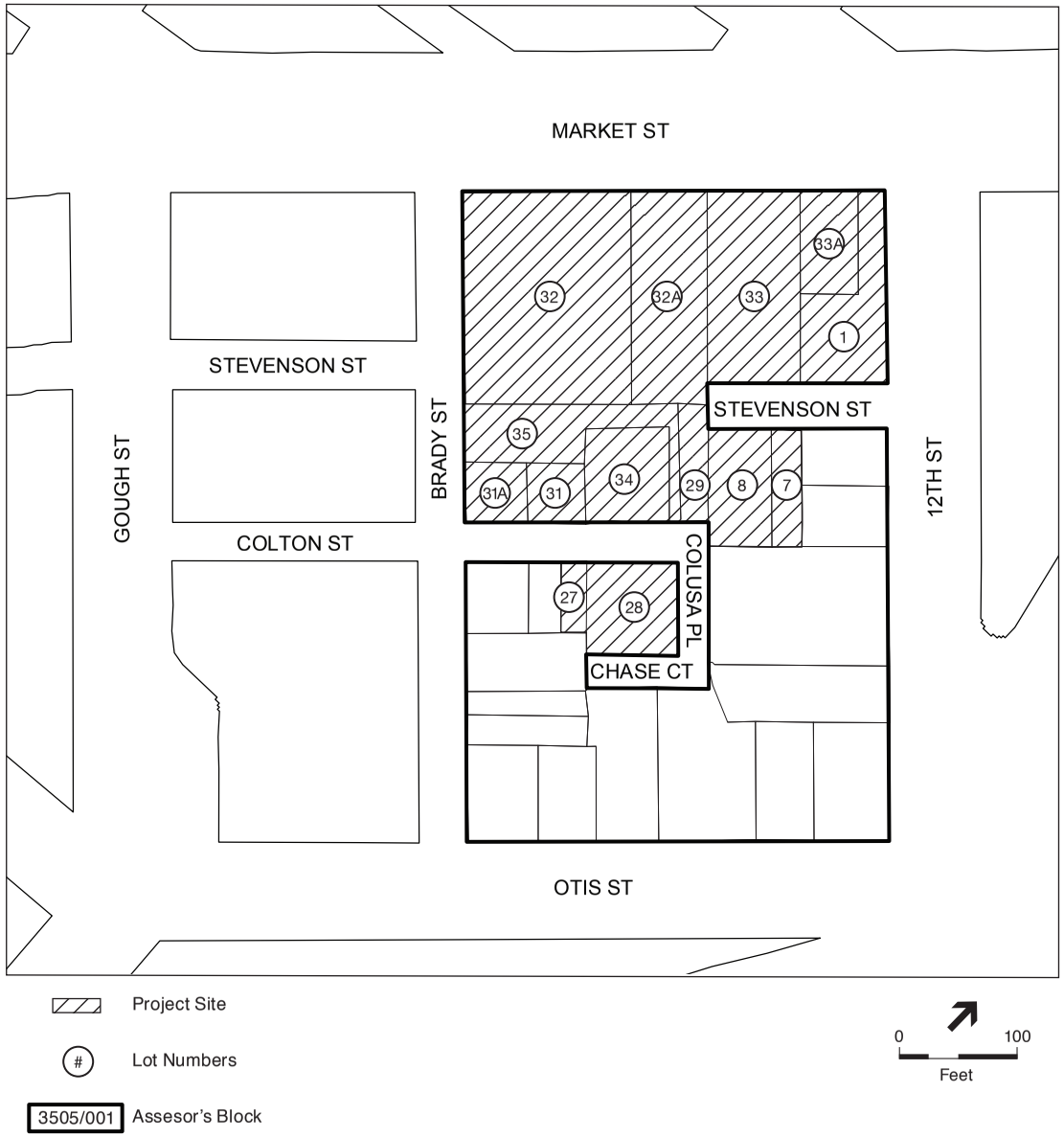
The project site is currently occupied by four surface parking lots, a BART ventilation structure, as well as three buildings: the Civic Center Hotel, built in 1915; the UA Local 38 building, built in 1923 and extensively remodeled in 1964; and the Lesser Brothers Building, built in 1925. The Civic Center Hotel occupies the entirety of Lot 001 as a five-story, 55-foot-tall, 40,000-square-foot, building, with pedestrian access from 12th Street.[4] The Civic Center Hotel is temporarily serving as a Navigation Center, and while acting as such, is housing up to 140 transitional occupants supported with up to 14 employees at a single time. The existing UA

[3] Following San Francisco convention, Market Street and streets parallel to it are considered to run east/west, while 12th Street and streets parallel to it are considered to run north/south.

[4] Building heights for the existing buildings and the proposed project do not include rooftop mechanical penthouses. In accordance with *Planning Code* Section 260(b)(1)(B), elevator, stair, and mechanical penthouses would be a maximum of 16 feet in height above the roof line.







SOURCE: ESA, 2016

1629 Market Street: Case No. 2015-005848ENV

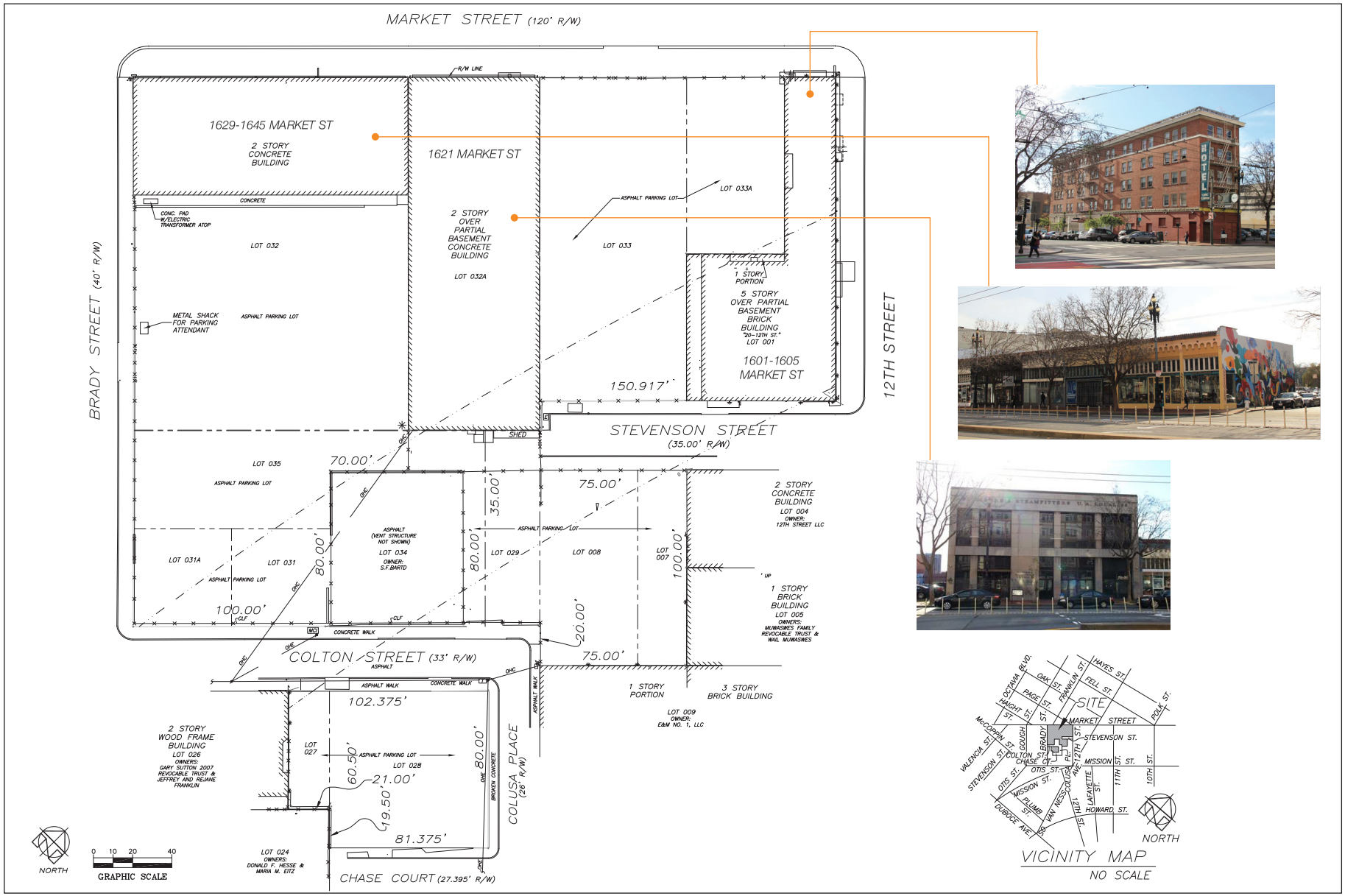
Figure 1
Project Location

Local 38 building, located on Lot 032A, is a two-story, 35-foot-tall, 24,100-square-foot building containing offices and an assembly hall for the UA Local 38. The building covers the entire lot, and pedestrian access is available from Market Street. A surface parking lot (Lots 033 and 033A), accessible via a curb cut on Market Street, containing 69 off-street vehicle parking spaces is located adjacent to the existing UA Local 38 building. The Lesser Brothers Building, located on Lot 032, is a one-story, 20-foot-tall, 25,300-square-foot building. The building fronts on Market Street and covers approximately one-third of the lot. A surface vehicle parking lot (Lots 031, 031A, 032, and 035), accessible via a curb cut on Brady Street, extends south of the building to Colton Street and contains 95 off-street vehicle parking spaces. Another surface parking lot (Lots 007, 008, and 029), accessible via a curb cut on Colton Street, containing 39 off-street vehicle parking spaces is located on the project site south of Stevenson Street. A surface parking lot (Lots 027 and 028), accessible via a curb cut on Colton Street, containing 39 off-street vehicle parking spaces is also located on the project site, bounded by Colton Street to the north, Colusa Place to the east, and Chase Court to the south. The BART ventilation structure is located on Lot 34 in between the two surface parking lots south of Stevenson Street and north of Colton Street.

PROPOSED PROJECT

The proposed project would demolish the existing UA Local 38 building, demolish the majority of the Lesser Brothers Building, and rehabilitate the Civic Center Hotel (see **Figure 2**). The proposed project would also include construction of a new four-story, 58-foot-tall, 27,300-square-foot UA Local 38 building, as well as a 10-story, 85-foot-tall, 187,100-square-foot addition to the 20-foot-tall Lesser Brothers Building (see **Figure 3**, Building A) containing 198 residential units and 6,600 square feet of ground-floor retail/restaurant space.[5] A 10-story, 85-foot-tall, 118,300-square-foot mixed-use building (see **Figure 3**, Building B) containing 136 residential units and 2,500 square feet of ground-floor retail/restaurant space would be constructed on Market Street between the new UA Local 38 building and Building A. The five-story, 55-foot-tall, 67,200-square-foot Civic Center Hotel would be rehabilitated (see **Figure 3**, Building C) to contain 65 residential units and 4,000 square feet of ground-floor retail/restaurant space. A nine-story, 85-foot-tall, 74,700-square-foot residential building (see **Figure 3**, Building D) containing 78 residential units would be constructed south of Buildings A, B, and C and north of Colton Street. A new six-story, 68-foot-tall Colton Street Affordable Housing building containing up to 107 affordable units would be constructed south of Colton Street as part of the proposed project. The proposed project would seek an amendment to the Height and Bulk Map to change the height and bulk designation of the affordable housing portion of the project site from 40-X to 68-X. Overall, the proposed project would include construction of 498,100 square feet of residential use that would contain up to 477 residential units (including market-rate units and affordable units as required to meet on-site inclusionary requirements under *Planning Code* Section 415), as well as up to 107 affordable units in the Colton Street Affordable Housing building. In addition, the proposed project would construct 27,300 square feet of union facility use, 13,000 square feet of ground-floor retail/restaurant space along Market, 12th, and Brady Streets in Buildings A, B, and C, and 31,600 square feet of publicly-accessible and residential open space (see **Figures 3 through 8** and **Table 1**). The residential unit breakdown for the 477 units would consist of approximately 103 studio units (21.6 percent), 180 one-bedroom units (37.7 percent), and 194 two-bedroom units (40.6 percent).

[5] Building heights for the existing buildings and the proposed project do not include rooftop mechanical penthouses. In accordance with *Planning Code* Section 260(b)(1)(B), elevator, stair, and mechanical penthouses would be a maximum of 16 feet in height above the roof line.

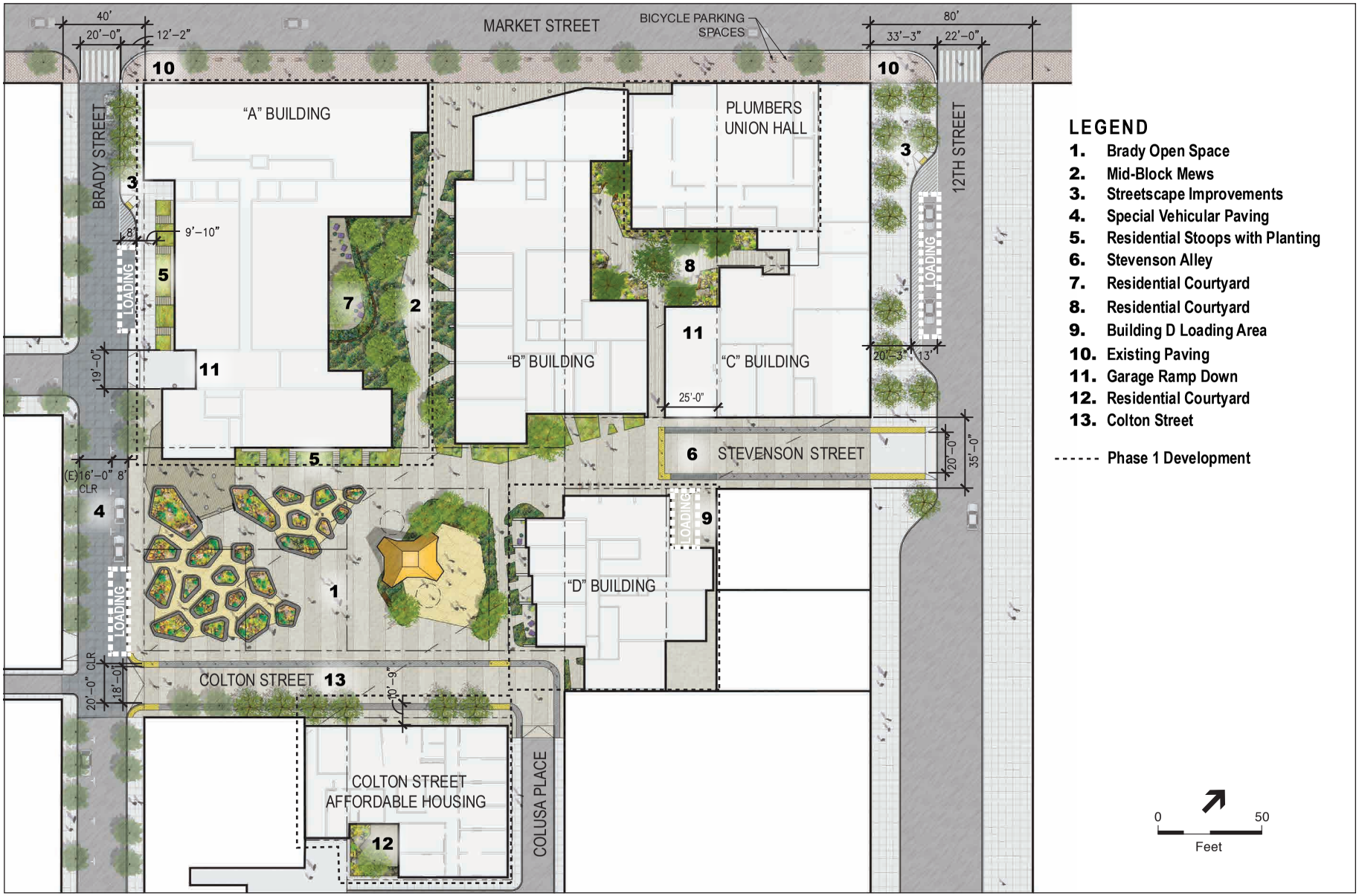


SOURCE: Martin M. Ron Associates; Christopher VerPlanck, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure 2

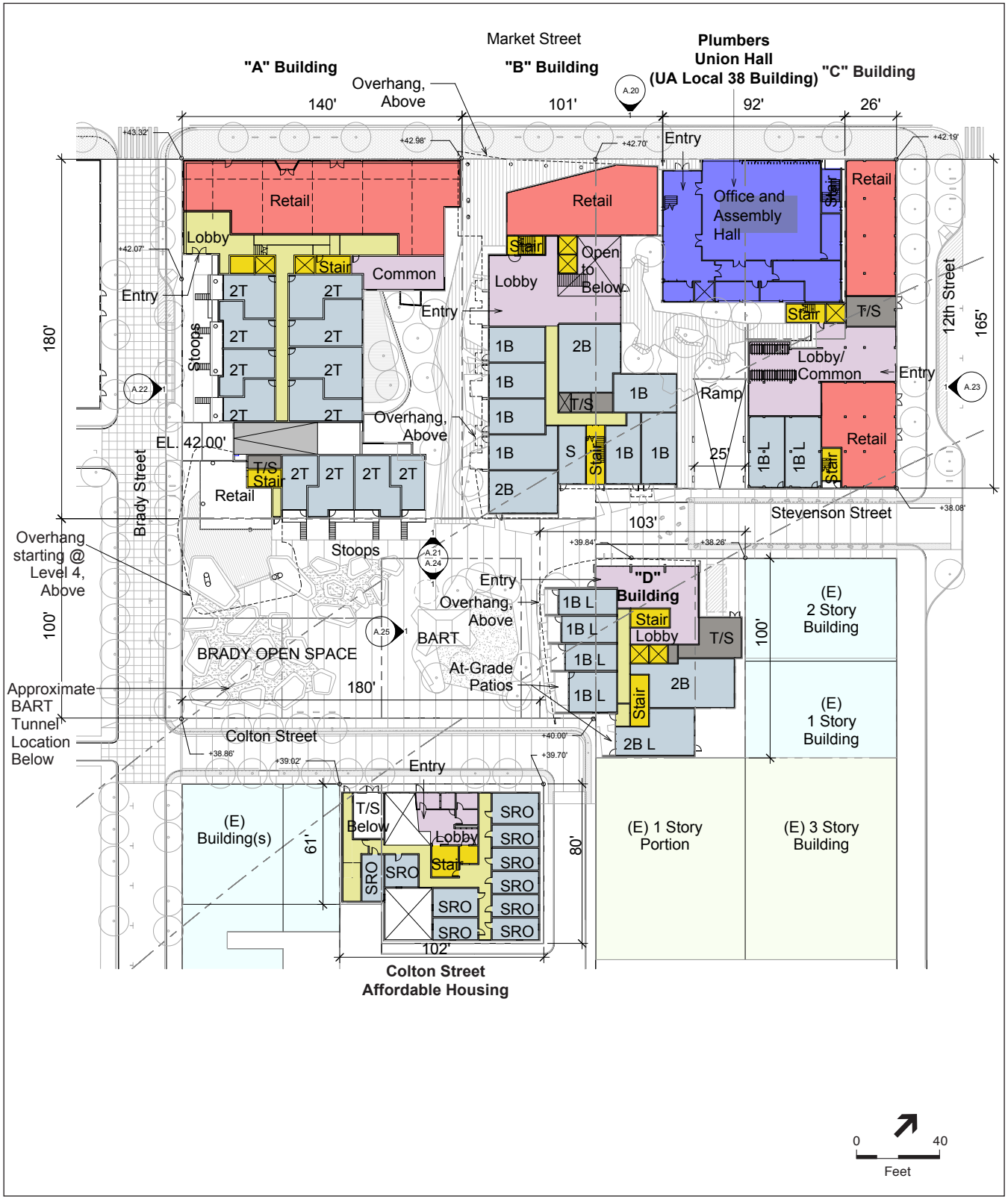
Existing Site Plan



SOURCE: David Baker Architects, Kennerly Architecture & Planning, and Conger Moss Guillard Landscape Architecture, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure 3
Proposed Site Plan



SOURCE: Kennerly Architecture & Planning, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure 4
Ground Floor Plan

SOURCE: David Baker Architects and Kennerly Architecture & Planning, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure 5
2nd Floor Plan

SOURCE: David Baker Architects and Kennerly Architects, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure 6

North Elevation at Market Street

SOURCE: David Baker Architects, and Kennerly Architecture & Planning, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure 7

East Elevation at 12th Street

SOURCE: David Baker Architects, and Kennerly Architecture & Planning, 2016

1629 Market Street: Case No. 2015-005848ENV

Figure 8

South Elevation at Brady Square Park

TABLE 1 PROPOSED PROJECT CHARACTERISTICS

Proposed Use	Description	Approximate Square Feet (sf) [a]
RESIDENTIAL [b, c]		**498,100 sf**
Building A	198 residential units	187,100 sf
Building B	136 residential units	118,300 sf
Building C	65 residential units	67,200 sf
Building D	78 residential units	74,700 sf
Colton Street Affordable Housing	Up to 107 affordable units	50,900 sf
RETAIL/RESTAURANT		**13,000 sf**
Building A	Floors 1 and 2 fronting Market Street and a rear portion of Floor 1 fronting Brady Street	6,600 sf
Building B	Floors 1 and 2 fronting Market Street	2,500 sf
Building C	Floor 1 fronting 12th Street	4,000 sf
Building D	—	—
PLUMBERS UNION HALL		**27,300 sf**
OPEN SPACE	**Residential and Publicly-Accessible Open Space** [d]	**31,600 sf**
Residential Private and Common Open Space	Common	**6,700 sf**
	Private – provided for 18 units	**1,440 sf**
Building A	Common – roof deck	4,600 sf
	Private – provided for 7 units	560 sf
Building B	Private – provided for 7 units	560 sf
Building C	N/A	—
Building D	Common – roof deck	1,500 sf
	Private – provided for 4 units	320 sf
Colton Street Affordable Housing	Common	600 sf
Privately-owned, Publicly-Accessible Open Space		**23,500 sf**
Brady Open Space	Accessible from Market, Brady, and Colton Streets	18,300 sf
Mid-block Alley	At Market Street between Buildings A and B	5,200 sf
COMBINED PROJECT		
Total Site Area	Area of parcels at ground level	97,617 sf (2.2 acres)
Total Publicly-Accessible Open Space	Brady Open Space and Mid-block Alleys	23,500 sf
Total Residential Common Open Space	Roof decks (Buildings A and D, Courtyard Areas)	6,700 sf
Total Vehicle Parking	Buildings A and B, Below-grade Levels 1 and 2—up to 316 spaces (some of which may include stackers), including 3 car-share spaces and 7 ADA-accessible spaces	—
Total Loading Spaces	6 on-street loading spaces; 4 off-street commercial loading spaces; 1 on-site move in/move out space (Building D)	10
Total Class 1 Bike Parking Spaces	231 spaces	—
Total Class 2 Bike Parking Spaces	42 spaces [e]	—

SOURCE: David Baker Architects and Kennerly Architects, September 2016.

a. Square footages may not add up to the totals shown since the numbers are rounded.

b. Includes amenity, circulation, and service space.

c. The 477 residential units would include affordable units as required to meet on-site inclusionary requirements under *Planning Code* Section 415.

d. Exact square footage for private residential open space is provided based on the 80-square-foot minimum per dwelling unit per Section 731.93 of the *Planning Code*.

e. These bicycle spaces would be provided on sidewalks adjacent to the project site. The placement of the bicycle racks would comply with the San Francisco Municipal Transportation Agency (SFMTA) rack placement guidelines.

Open Space

The proposed project would provide privately-owned, publicly-accessible open space with the planned 18,300-square-foot Brady Open Space at the northeast corner of Brady and Colton Streets. The BART ventilation structure would remain in place within the Brady Open Space, but would be enclosed with a sculptural art installation. In addition, the proposed project would provide a 5,200-square-foot privately-owned, publicly-accessible mid-block alley between Buildings A and B accessible via Market Street that would connect to the Brady Open Space. Buildings A and D would provide additional common open space for residents on the rooftops and in courtyards, and the Colton Street Affordable Housing building would also provide common open space in an inner courtyard, for a total of 6,700 square feet of common open space in the proposed project. In addition, Buildings A, B, and D would provide private open space in the form of 80-square-foot terraces or decks for 18 units, totaling approximately 1,440 square feet of private open space.

Parking, Bicycle, and Loading Facilities

The proposed project would remove the existing curb cuts along Market, Brady, and Colton Streets and create a new approximately 19-foot-wide curb cut and garage opening on Brady Street (at Stevenson Street). The proposed project also would create a new approximately 25-foot-wide curb cut on Stevenson Street, approximately 140 feet west of the intersection of Stevenson and 12th Streets, that would provide access to the two-level vehicle parking garage located under Buildings A and B. In addition, access into Stevenson Street from 12th Street would be provided via an approximately 20-foot-wide curb cut through a sidewalk bulb out on 12th Street. The parking area under Building A would contain a total of 142 vehicle parking spaces (some of which may include the use of stackers) for residents and retail/restaurant uses, as well as the UA Local 38 building. The parking area under Building B would contain 174 vehicle parking spaces (some of which may include the use of stackers). Therefore, the proposed project would provide a total of 316 vehicle parking spaces, including seven ADA-accessible spaces and three car-share spaces.

A secure bicycle room on Level 1 of the parking garage proposed under Building A would accommodate 231 Class 1 bicycle parking spaces. In addition, 42 Class 2 bicycle spaces would be provided on sidewalks adjacent to the project site, including on Market, Brady, 12th, and Colton Street sidewalks. The placement of the bicycle racks would comply with the San Francisco Municipal Transportation Agency (SFMTA) rack placement guidelines.

The proposed project would provide on-street and on-site loading spaces. Ten loading spaces would be provided on streets adjacent to the project site for the proposed project. A 100-foot commercial/passenger loading zone (five spaces) would be provided on the west side of 12th Street, a 60-foot commercial/passenger loading zone (three spaces) would be provided on the east side of Brady Street north of Stevenson Street, and 40-foot commercial/passenger loading zone (two spaces) would also be provided on the west side of Brady Street north of Colton Street. In addition, two full-size off-street loading spaces would be provided in the parking garage under Building A, and two would also be provided in the parking garage under Building B. An on-site designated move-in/move-out loading space would also be provided adjacent to Building D.

Landscaping and Streetscape Improvements

As part of the proposed project, the 29 existing street trees along Market, Brady, Colton, and 12th Streets would be retained or replaced. According to *Planning Code* Section 138.1(c)(1), the project sponsor would be

required to retain and/or plant 50 trees on street frontages adjacent to the project site.[6] All new and/or replacement trees on frontages adjacent to the project site would be planted in accordance with the standards set forth in *Planning Code* Section 138.1(c)(1) and the *Better Streets Plan*. If San Francisco Public Works (Public Works) determines that planting the full complement of required street trees would not be feasible due to site constraints or other reasons, the project sponsor may request a waiver to this requirement from the Zoning Administrator (*Planning Code* Section 138.1(c)(1)(C)(iii)).

Foundation and Excavation

The proposed project would entail excavation to a maximum depth of approximately 30 feet to accommodate the two below-grade parking levels and foundation. Phase 1 excavation would total up to approximately 39,700 cubic yards, and Phase 2 would total up to approximately 23,700 cubic yards. The proposed project is anticipated to be constructed on a mat foundation. As discussed in the geotechnical report, impact pile driving is not anticipated as part of the proposed project.[7]

The central portion of the project site is located over the underground tunnels for the BART system and all of the proposed buildings are located within the BART Zone of Influence (ZOI). Therefore, the proposed project is subject to BART permit review procedures and guidelines for construction over its facilities.

Project Construction Phases

The proposed project would be constructed in two phases. Phase 1 would include construction of the Colton Street Affordable Housing building, the new UA Local 38 building, and Building D, all of which would be located on existing surface parking lots. In addition, Building A, including the two-level, below-grade parking garage would also be constructed during Phase 1. The two-level, below-grade parking garage under Building B would be completed in Phase 2. Construction of Building A would entail demolition of the majority of the Lesser Brothers Building and construction of a 10-story addition behind the portion of the façade along Market Street proposed to be retained. Residents of the Civic Center Hotel would remain onsite during Phase 1 construction, as would employees of the UA Local 38 building. Following the completion of Phase 1 construction, the new buildings would be available for occupancy and current long-term residents of the Civic Center Hotel would have the opportunity to move and relocate into the new Colton Street Affordable Housing building. Phase 2 construction would entail demolition of the existing UA Local 38 building and the construction of Building B and its below-grade parking garage, and the rehabilitation of the Civic Center Hotel (Building C) into a mixed-use building with residential use over ground-floor retail/restaurant. Upon completion of the proposed project, the two garage areas under Buildings A and B would be connected and result in one garage, with access from Brady and Stevenson Streets.

Construction Schedule

The construction duration for the entire proposed project is estimated to require a total of 44 months. Phase 1 would require 21 months and is anticipated to begin in March 2018, with initial occupancy anticipated to occur

[6] *Planning Code* Section 138.1(c)(1) requires that for every 20 feet of property frontage along each street, one 24-inch box tree be planted, with any remaining fraction of 10 feet or more of frontage requiring an additional tree.
[7] Langan Treadwell Rollo, *Preliminary Geotechnical Investigation, 1629 Market Street*, July 5, 2016.

by January 2020. Phase 1 would involve demolition and site preparation (including grading and excavation) that would take approximately five months, followed by foundation and below-grade construction requiring two months, then building construction, paving, and architectural coatings would require an additional eleven months, with completion of interiors taking an additional four months.

Phase 2 of the proposed project is anticipated to begin in January 2020 and require 23 months for completion, anticipated by November 2021. Phase 2 would involve demolition and site preparation (including grading and excavation) and would take approximately six months, followed by foundation and below-grade construction requiring two months, then building construction, paving, and architectural coatings would require an additional nine months, with completion of interiors completion taking an additional four months.

APPROVALS REQUIRED FOR THE PROPOSED PROJECT

Planning Commission

- Certification of the Environmental Impact Report, and adoption of findings under CEQA.
- Adoption of findings of consistency with the *General Plan* and priority policies of *Planning Code* Section 101.1.
- Recommendation to the Board of Supervisors of an amendment to the Height and Bulk Map to change the height and bulk designation of the affordable housing portion of the project site from 40-X to 68-X.
- Recommendation to the Board of Supervisors of an amendment to the Zoning Use District Map (rezoning) to reflect the reconfigured open space parcel for the Brady Open Space.
- Recommendation to the Board of Supervisors of amendments to the Market & Octavia Area Plan including to Map 1 Land Use Districts, Map 3 Height Districts, and Policy 7.2.5 to reflect the updated proposed plan for the Brady Open Space.
- Recommendation to the Board of Supervisors of a Special Use District to reflect other Code compliance and phasing issues on a site-wide basis, such as open space and narrow street setbacks.
- Recommendation to the Board of Supervisors of a Development Agreement with respect to the project sponsor's commitment to develop supportive affordable housing as part of the proposed project and to develop and maintain the Brady Open Space.
- Approval of Conditional Use Authorization/Planned Unit Development from the Planning Commission per *Planning Code* Sections 303 and 304 to permit development of a large lot (10,000 square feet and above) and large non-residential use (6,000 square feet and above), and to provide exceptions to the *Planning Code* requirements for: rear yard, dwelling unit exposure, active street frontage, loading, and measurement of height, including adoption of the Mitigation Monitoring Reporting Program as part of the conditions of approval.
- *General Plan* referral for sidewalk widening.

Board of Supervisors

- Adoption of findings under CEQA.
- Adoption of findings of consistency with the *General Plan* and priority policies of *Planning Code* Section 101.1.

- Approval of an amendment to the Height and Bulk Map to change the height and bulk designation of the affordable housing portion of the project site from 40-X to 68-X.
- Approval of an amendment to the Zoning Use District Map (rezoning) to reflect the reconfigured open space parcel for the Brady Open Space.
- Approval of amendments to the Market & Octavia Area Plan including to Map 1 Land Use Districts, Map 3 Height Districts, and Policy 7.2.5 to reflect the updated proposed plan for the Brady Open Space.
- Approval of Special Use District to reflect other *Planning Code* compliance issues on a site-wide basis, such as open space and narrow street setbacks.
- Approval of a Development Agreement with respect to the project sponsor's commitment to develop affordable housing as part of the proposed project and to develop and maintain the Brady Open Space.
- Approval of sidewalk widening legislation.

Department of Building Inspection

- Review and approval of demolition, grading, and building permits.
- If any night construction work is proposed that would result in noise greater than five dBA above ambient noise levels, approval of a permit for nighttime construction is required.
- Permit to provide in-kind replacement of the 71 Single Room Occupancy units that are designated as Residential Hotel Units.

San Francisco Public Works

- If sidewalk(s) are used for construction staging and pedestrian walkways are constructed in the curb lane(s), approval of a street space permit from the Bureau of Street Use and Mapping.
- Approval of a permit to remove and replace street trees adjacent to the project site.
- Approval of construction within the public right-of-way (e.g., curb cuts, bulb-outs and sidewalk extensions) to ensure consistency with the *Better Streets Plan*.
- Approval of parcel mergers and new subdivision maps.
- Recommendation of sidewalk widening legislation.

San Francisco Municipal Transportation Agency

- Approval of the placement of bicycle racks on the sidewalk, and of other sidewalk improvements, by the Sustainable Streets Division.
- If any portion of the public right-of-way is used for construction staging and pedestrian walkways are constructed in the curb lane(s), approval of a special traffic permit from the Sustainable Streets Division.
- Approval of construction within the public right-of-way (e.g., bulbouts and sidewalk extensions) to ensure consistency with the *Better Streets Plan*.
- Approval of designated color curbs for on-street loading along Brady and Stevenson Streets.

San Francisco Public Utilities Commission

- Approval of any changes to sewer laterals (connections to the City sewer system).
- Approval of an Erosion and Sediment Control Plan, in accordance with Article 4.1 of the *San Francisco Public Works Code*.
- Approval of post-construction stormwater design guidelines, including a stormwater control plan that complies with the City's 2016 Stormwater Management Requirements and Design Guidelines.

San Francisco Department of Public Health

- Approval of an Enhanced Ventilation Proposal as required pursuant to Article 38 of the *Health Code*.
- Approval of a Dust Control Plan as required pursuant to Article 22B of the *Health Code*.
- Approval of a Work Plan for Soil and Groundwater Characterization and, if determined necessary by the Department of Public Health, a Site Mitigation Plan, pursuant to Article 22A of the *Health Code*.

SUMMARY OF POTENTIAL ENVIRONMENTAL ISSUES

The proposed project could result in potentially significant environmental effects. The Planning Department will prepare an initial study (IS) and focused environmental impact report (EIR) to evaluate the physical environmental effects of the proposed project. These studies will assess both project-specific and cumulative impacts for all topics. As required by the California Environmental Quality Act (CEQA), the EIR will further examine those issues identified in the IS to have potentially significant effects, identify mitigation measures, and analyze whether the proposed mitigation measures would reduce the environmental effects to a less-than-significant level. The IS will be published along with the Draft EIR as an appendix. The EIR also will evaluate a No Project Alternative, which will assume no change to the existing conditions on the project site, as well as additional project alternatives that could potentially reduce or avoid any significant environmental impacts associated with the proposed project.

As part of the review process under CEQA, the Planning Department will convene a public scoping meeting at which public comment will be solicited on the issues that will be covered in the EIR (see "Public Scoping Meeting" on page 21 for more details. It is anticipated that the EIR will address environmental topics including historic architectural cultural resources and transportation and circulation. Environmental impacts related to land use and land use planning, population and housing, cultural resources including tribal cultural resources, subsurface cultural (archeological) resources, and human remains, 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 are anticipated to be analyzed in the IS, unless significant impacts are identified that cannot be mitigated to a less-than-significant level, in which case, any such impacts analysis will be included in the EIR. The environmental issues to be addressed are described briefly below. The project meets all of the requirements of a transit-oriented infill development project under Senate Bill 743; therefore, aesthetics and parking shall not be considered in determining if the project has the potential to result in significant environmental effects. However, visual simulations will be included within the project description of the EIR for reference.

Land Use and Planning

The topic of Land Use and Land Use Planning will describe existing land uses on and near the project site and analyze whether the proposed project would physically divide an established community or result in land use conflicts within the Market & Octavia Area Plan area and vicinity.

Population and Housing

The topic of Population and Housing will include analysis of the proposed project's potential impact related to population, employment and housing, and residential displacement.

Cultural Resources

Two of the three buildings on the project site—the Civic Center Hotel at 1601–05 Market Street and the Lesser Brothers Building at 1629–45 Market Street, are considered historical resources for purposes of CEQA review. The proposed project would retain and rehabilitate the Civic Center Hotel and would demolish a majority of the Lesser Brothers Building, and would also demolish the third building, the UA Local 38 building, which is not a historical resource. The historic significance of the existing buildings and the proposed project's impacts on the two resources is the subject of a Historical Resources Evaluation (HRE) report, prepared by a qualified consultant and independently evaluated by the Planning Department's Preservation staff, who prepared a Historic Resources Evaluation Response (HRER). The EIR will summarize applicable portions of the HRER and the HRE, describe the historical resources on the project site, and identify potential impacts on these historic resources. The IS will analyze potential effects on tribal cultural resources, on subsurface cultural (archeological) resources, and on human remains.

Transportation and Circulation

The proposed project would generate new vehicle trips, resulting in additional vehicle miles traveled (VMT) to and from the project site, as well as increases in transit ridership, pedestrian and bicycle activity, and loading demand. A Transportation Impact Study will be prepared for the proposed project in accordance with the Planning Department's *Transportation Impact Analysis Guidelines for Environmental Review* (October 2002) and Planning Commission Resolution 19579 establishing VMT as the appropriate transportation review standard. The study will include an analysis of specific transportation impacts and mitigation measures associated with the proposed circulation scheme and construction-period transportation and circulation impacts. The EIR will summarize the findings of the transportation impact study. The EIR impact analysis will also analyze transit conditions, traffic hazards, pedestrian and bicycle conditions, freight loading, emergency vehicle access, and transportation-related construction and will discuss parking conditions for informational purposes. The EIR transportation analysis will also evaluate cumulative effects of anticipated development, transit, and streetscape improvements in the project vicinity.

Noise

The topic of Noise will include analysis of noise compatibility standards for residential and office land uses, and discuss the long-term impacts of noise that could result from the proposed project. Short-term construction-related noise and vibration impacts also will be described, and the analysis will evaluate the potential for noise from the proposed project to adversely affect nearby sensitive land uses.

Air Quality

The topic of Air Quality will include analysis of consistency of the proposed project with applicable air quality plans and standards, the potential for the proposed project to result in emissions of criteria air pollutants and other toxic air contaminants (TACs) that may affect sensitive populations, as well as the potential for the proposed project to result in sources of odor. The air quality analysis will include quantification of both construction-related and operational air pollutant emissions. The analysis will also summarize the results of a health risk assessment prepared to evaluate potential long-term health effects of emissions from both project construction and operation.

Greenhouse Gas Emissions

The topic of Greenhouse Gas Emissions will include an analysis of the proposed project's consistency with the City's Greenhouse Gas Reduction Strategy and the degree to which the proposed project's greenhouse gas emissions could result in a significant effect on the environment.

Wind and Shadow

The topic of Wind will evaluate the potential to alter wind in a manner that substantially affects public areas. Based on a preliminary shadow fan analysis prepared by the Planning Department, no City parks or other publicly-accessible open space exists within the potential shadow area of the proposed project, and therefore no parks or open spaces would be affected by project shadow. The topic of Shadow will include an evaluation of the potential for the proposed project to result in shadow impacts on nearby sidewalks. In addition, for informational purposes the Shadow section will describe the potential for the proposed project to result in shadow on the project site itself, including the proposed Brady Open Space.

Recreation

The topic of Recreation will include an analysis of whether the proposed project could adversely affect existing parks and open spaces.

Utilities and Service Systems

The topic of Utilities and Service Systems will include analysis of potable water and wastewater treatment capacity, and will discuss disposal of solid waste that may be generated by the proposed project. This topic will also include an assessment of whether the proposed project would require the construction of new water supply, wastewater treatment, and/or stormwater drainage facilities, and if so, whether that construction could result in adverse environmental effects.

Public Services

The topic of Public Services will include analysis of whether existing public services (e.g., schools, police and fire protection, etc.) would be adversely affected by the proposed project so as to require new or physically altered facilities, the construction of which could cause significant impacts.

Biological Resources

The topic of Biological Resources will include analysis of any substantial adverse effect on important biological resources or habitats, such as trees or the movement of any native resident or migratory bird species.

Geology and Soils

The topic of Geology and Soils will include an analysis related to the susceptibility of the project site to seismic activity, liquefaction, landslides, erosion, soil stability, and risks to life or property. Geology and Soils will also include an analysis as to whether or not the proposed project would substantially change the topography or any unique geologic or physical features of the site, or directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. In addition, the analysis will also discuss plan review requirements with respect to construction atop the BART tunnels that pass beneath the project site. Specifically, because the project site is located within the BART zone of influence (ZOI), the proposed project plans would be subject to review by BART engineering, in addition to supporting documentation including but not limited to the geotechnical report, dewatering monitoring and recharging plans, a vibration monitoring plan, a foundation plan, and an excavation plan for any area within the ZOI.

Hydrology and Water Quality

The topic of Hydrology and Water Quality will assess the potential for the proposed project to violate water quality standards or waste discharge requirements or result in adverse effects to groundwater supplies. The analysis will also consider the degree to which the proposed project could affect drainage patterns or create water runoff that could affect stormwater drainage systems. Finally, the analysis will consider the potential of the project to place housing within a flood hazard area.

Hazards and Hazardous Materials

This topic will analyze the potential for the proposed project to create a significant hazard to the public or the environment related to hazardous materials through the routine transport, use, or disposal of hazardous materials, or the emission or release of hazardous material into soils or groundwater, or interfere with an emergency response plan.

Mineral and Energy Resources

The topic of Mineral and Energy Resources will include analysis of potential project impacts on existing mineral and energy resources.

Agricultural and Forest Resources

The topic of Agricultural and Forest Resources will include analysis of potential project impacts on existing agricultural and forest resources.

Other CEQA Issues

The IS and EIR analysis will identify feasible mitigation measures intended to lessen or reduce significant environmental impacts of the proposed project. Pursuant to CEQA and the State CEQA Guidelines, the EIR

also will analyze a range of alternatives that would reduce or avoid one or more significant environmental impacts identified in the EIR, including a Full Preservation Alternative and a No Project Alternative, as described in CEQA Guidelines Section 15126.6.

Other topics required by CEQA, including growth-inducing impacts; significant unavoidable impacts; significant irreversible impacts; any known controversy associated with environmental effects, mitigation measures, or alternatives; and issues to be resolved by the decision-makers also will be addressed.

FINDING

This project could have a significant effect on the environment and a focused environmental impact report will be prepared. This finding is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15064 (Determining Significant Effect) and 15065 (Mandatory Findings of Significance). The purpose of the EIR is to provide information about potential significant physical environmental effects of the proposed project, to identify possible ways to minimize the significant effects, and to describe and analyze possible alternatives to the proposed project. Preparation of an NOP or EIR does not indicate a decision by the City to approve or to disapprove the project. However, prior to making any such decision, the decision makers must review and consider the information contained in the EIR.

PUBLIC SCOPING MEETING

Pursuant to the State of California Public Resources Code Section 21083.9 and CEQA Guidelines Section 15206, the Planning Department will hold a public scoping meeting to receive oral comments concerning the scope of the EIR. The meeting will be held on March 1, 2017, at 6:00 p.m. at the American Red Cross building at 1663 Market Street, San Francisco. Written comments will also be accepted at this meeting and until 5:00 p.m. on Monday, March 13, 2017. Written comments should be sent or emailed to Lisa M. Gibson, Acting Environmental Review Officer, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103, or Lisa.Gibson@sfgov.org and should reference the project title and case number on the front of this notice.

State Agencies: If you work for an agency that is a Responsible or a Trustee Agency, we need to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project. Please include the name of a contact person in your agency. If you have questions concerning environmental review of the proposed project, please contact **Debra Dwyer** at **415.575.9031.**

Members of the public are not required to provide personal identifying information when they communicate with the Commission or the Department. All written or oral communications, including submitted personal contact information, may be made available to the public for inspection and copying upon request and may appear on the Department's website or in other public documents.

February 8, 2017
Date

Lisa M. Gibson
Lisa M. Gibson
Acting Environmental Review Officer

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Appendix C
Public Utilities Commission Resolution and Water Supply Assessment

ESA


ESA

PUBLIC UTILITIES COMMISSION

City and County of San Francisco

RESOLUTION NO. **16-0201**

WHEREAS, Under the California Environmental Quality Act (CEQA) and State Water Code (Section 10910(g)(1)), the San Francisco Public Utilities Commission (SFPUC) is required to prepare and approve a Water Supply Assessment (WSA) for the 1629 Market Street Project's cumulative water demands; and

WHEREAS, A WSA is an informational document that assesses the adequacy of water supplies to serve a project and is required to be prepared as part of the CEQA environmental review process; and

WHEREAS, As an informational document, approval of the WSA is not a project under CEQA and is not an approval of the 1629 Market Street Project; and

WHEREAS, A WSA must be approved at a public meeting by the governing body of the public water supplier that would serve the project; and

WHEREAS; The SFPUC staff prepared a WSA for the 1629 Market Street Project, which concluded that the SFPUC has adequate water supplies to meet the Project's water demands through 2040; now, therefore, be it

RESOLVED, This Commission approves the Water Supply Assessment for the 1629 Market Street Project, pursuant to the State of California Water Code 10910(g).

I hereby certify that the foregoing resolution was adopted by the Public Utilities Commission at its meeting of September 27, 2016.

Alonna Wood

Secretary, Public Utilities Commission

AGENDA ITEM
Public Utilities Commission
City and County of San Francisco

DEPARTMENT Water Enterprise AGENDA NO. **9a**

MEETING DATE September 27, 2016

Approve Water Supply Assessment: Consent Calendar
Project Manager: Paula Kehoe

Approve Water Supply Assessment for the 1629 Market Street Project

Summary of Proposed Commission Action:	**Approve** the Water Supply Assessment (WSA) for the proposed 1629 Market Street Project, pursuant to the State of California Water Code Section 10910 *et seq.* and California Environmental Quality Act (CEQA) Section 21151.9 and CEQA Guidelines Section 15155.
Background:	Water Code Sections 10910-10915 provide a nexus between the regional land use planning process and the environmental review process. The law also reflects the growing awareness of the need to incorporate water supply and demand analysis at the earliest possible stage in the land use planning process. The core of this law is the requirement for a public water system to prepare a water supply assessment (WSA) of whether available water supplies are sufficient to serve the demand generated by projects of a specified size ("water demand projects"), as well as the reasonably foreseeable cumulative demand in the region over the next 20 years under a range of hydrologic conditions. The WSA is required within 90 days of the time the public water system receives a request for such assessment from the lead agency preparing an environmental impact report (EIR) or negative declaration under CEQA. The San Francisco Planning Department, which carries out the City's lead agency responsibilities under CEQA, is preparing an EIR for the proposed project and has identified the proposed project as a water demand project. The content of a WSA is specified by the Water Code and includes identification of any existing water supply entitlements or contracts, and detailed information about groundwater supplies. It assesses the adequacy of water supplies to serve the proposed project and cumulative demand. The WSA must be completed by the public water supplier that would serve the project and be approved by its governing body at a public meeting. Approval of a WSA is not approval of the development

APPROVAL: _____

COMMISSION SECRETARY Donna Hood

	project for which the WSA is prepared. A WSA is an informational document required to be prepared for use in the City's environmental review of a project under CEQA. The attached WSA prepared by San Francisco Public Utilities Commission (SFPUC) staff analyzes the sufficiency of long-term water supplies to serve the proposed project and cumulative development and concludes that there are adequate short-term and long-term water supplies to provide water service to the Project in compliance with the State Water Code requirements.
Result of Inaction:	A delay in approving this agenda item will result in the inability of the San Francisco Planning Department to complete the environmental review for the proposed 1629 Market Street Project. Under CEQA Guidelines Section 15155, the SFPUC may, within 90 days of the request for the WSA, request a reasonable extension of time to complete the WSA.
Description of Action:	Approve the WSA for the proposed 1629 Market Street Project**,** pursuant to the State of California Water Code 10910.
Environmental Review:	Approval of the WSA is not a project under CEQA as the WSA is an informational document prepared for the CEQA process and is not an approval of the Project.
Recommendation:	SFPUC staff recommends that the Commission adopt the resolution.
Attachment:	1. Water Supply Assessment for the 1629 Market Street Project

PUBLIC UTILITIES COMMISSION

City and County of San Francisco

RESOLUTION NO. _____

WHEREAS**,** Under the California Environmental Quality Act (CEQA) and State Water Code (Section 10910(g)(1)), the San Francisco Public Utilities Commission (SFPUC) is required to prepare and approve a Water Supply Assessment (WSA) for the 1629 Market Street Project's cumulative water demands; and

WHEREAS, A WSA is an informational document that assesses the adequacy of water supplies to serve a project and is required to be prepared as part of the CEQA environmental review process; and

WHEREAS, As an informational document, approval of the WSA is not a project under CEQA and is not an approval of the 1629 Market Street Project; and

WHEREAS, A WSA must be approved at a public meeting by the governing body of the public water supplier that would serve the project; and

WHEREAS; The SFPUC staff prepared a WSA for the 1629 Market Street Project, which concluded that the SFPUC has adequate water supplies to meet the Project's water demands through 2040; now, therefore, be it

RESOLVED, This Commission approves the Water Supply Assessment for the 1629 Market Street Project, pursuant to the State of California Water Code 10910(g).

I hereby certify that the foregoing resolution was adopted by the Public Utilities Commission at its meeting of September 27, 2016.

_____

Secretary, Public Utilities Commission

San Francisco
Water Power Sewer
Services of the San Francisco Public Utilities Commission

525 Golden Gate Avenue, 13th Floor
San Francisco, CA 94102
T 415.554.3155
F 415.554.3161
TTY 415.554.3488

September 13, 2016

TO: Commissioner Francesca Vietor, President
Commissioner Anson Moran, Vice President
Commissioner Ann Moller Caen
Commissioner Vince Courtney
Commissioner Ike Kwon

THROUGH: Harlan L. Kelly, Jr., General Manager

FROM: Steven R. Ritchie, Assistant General Manager, Water

RE: Water Supply Assessment for the 1629 Market Street Project

---

1.0 Summary

1.1 Introduction

Under the Water Supply Assessment law (Sections 10910 through 10915 of the California Water Code), urban water suppliers like the San Francisco Public Utilities Commission (SFPUC) must furnish a Water Supply Assessment (WSA) to the city or county that has jurisdiction to approve the environmental documentation for certain qualifying projects (as defined in Water Code Section 10912 (a)) subject to the California Environmental Quality Act (CEQA). The WSA process typically relies on information contained in a water supplier's Urban Water Management Plan (UWMP), and involves answering specific questions related to the estimated water demand of the proposed project. This memo serves as the WSA for the proposed 1629 Market Street Project ("proposed project"), for use in the preparation of an environmental impact report by the City and County of San Francisco Planning Department (case no. 2015-005848ENV, San Francisco Planning Department).

1.1.1 2015 Urban Water Management Plan

The SFPUC's most current UWMP is the UWMP update for 2015, which was adopted in June 2016. The water demand projections in the UWMP incorporated 2012 Land Use Allocation (LUA 2012) housing and employment growth projections from the San Francisco Planning Department.

The WSA for a qualifying project within the SFPUC's retail service area may use information from the UWMP. Therefore, ***the 2015 UWMP is incorporated via references throughout this WSA shown in bold, italicized text.*** The UWMP may be accessed at www.sfwater.org/uwmp.

1.1.2 Basis for Requiring a WSA for the Proposed Project

The proposed project has not been the subject of a previous WSA, nor has it been part of a larger project for which a WSA was completed. The proposed project qualifies for preparation of a WSA under Water Code Section 10912(a) because it is a mixed-use residential development that includes more than 500 dwelling units. The proposed project is characterized further in Section 1.2.

1.1.3 Conclusion of this WSA

In this WSA, the SFPUC concludes that there are adequate water supplies to serve the proposed project and cumulative retail water demands during normal years, single dry years, and multiple dry years over a 20-year planning horizon from 2020 through 2040. Additional information on supply sufficiency is provided in Section 4.2, Findings.

1.2 Proposed Project Description

The project sponsor, Strada Brady, LLC, proposes to completely demolish the United Association Local 38 Plumbers and Pipefitter's Union Hall (UA Local 38) building, partially demolish the retail building at 1637 Market Street and add a vertical addition, and rehabilitate the Civic Center Hotel and add a vertical addition. The proposed project would include construction of approximately 477 market-rate residential rental units and about 9,275 square feet of retail/restaurant space along Market, 12th, and Brady Streets in four buildings (including the two vertical additions added to the rehabilitated Civic Center Hotel and behind the retained Market Street façade of the retail building at 1637 Market Street); construction of a fifth building containing an additional 107 units of affordable housing with on-site social services; and construction of a sixth building containing an approximately 27,300-square-foot new union hall and offices for UA Local 38. The planned Brady Street open space would be developed, in addition to open space in courtyards between the four market-rate buildings, which would extend southward from Market Street with their principal axes perpendicular to the street. Each of these four buildings and the supportive housing building, which would front on Colton Street, would include additional common open space for residents on the rooftops. The project site is located on the south side of Market Street between Brady and 12th streets, within San Francisco's Market and Octavia Area Plan. Refer to Attachment B for further details on the proposed project.

2.0 Water Supply

This section reviews San Francisco's existing and planned water supplies.

2.1 Regional Water System

See ***Section 3.1 of the UWMP*** for descriptions of the Regional Water System (RWS) and ***Section 6.1 of the UWMP*** for water rights held by City and County of San Francisco and the SFPUC Water System Improvement Program (WSIP).

2.2 Existing Retail Supplies

Retail water supplies from the RWS are described in ***Section 6.1 of the UWMP***.

Local groundwater supplies, including the Westside Groundwater Basin, Central Groundwater Sub Basin, and Sunol Filter Gallery Subsurface Diversions, are described in ***Section 6.2.1 of the UWMP***.

Local recycled water supplies, including the Harding Park Recycled Water Project and Pacifica Recycled Water Project, are described in ***Section 6.2.1 of the UWMP***.

2.3 Planned Retail Water Supply Sources

The San Francisco Groundwater Supply Project is described in ***Section 6.2.2 of the UWMP***.

The proposed Westside and Eastside Recycled Water Projects, as well as non-potable water supplies associated with onsite water systems implemented in compliance with San Francisco's Non-potable Water Ordinance (Health Code Chapter 12C), are also described in ***Section 6.2.2 of the UWMP***.

2.4 Summary of Current and Future Retail Water Supplies

A breakdown of water supply sources for meeting SFPUC retail water demand through 2040 in normal years is provided in ***Section 6.2.5 of the UWMP***.

2.5 Dry-Year Water Supplies

A description of dry-year supplies developed under WSIP is provided in ***Section 7.2 of the UWMP***. Other water supply reliability projects and efforts that are currently underway or completed are described in ***Section 7.4 of the UWMP***. A breakdown of water supply sources for meeting SFPUC retail water demand through 2040 in multiple dry years are provided in ***Section 7.5 of the UWMP***. For a single dry year, the retail RWS allocation and, thus, the breakdown of water supply sources would be the same as those in a normal year.

3.0 Water Demand

This section reviews the climatic and demographic factors that may affect San Francisco's water use, projected retail water demands, and the demand associated with the proposed project.

3.1 Climate

San Francisco has a Mediterranean climate. Summers are cool and winters are mild with infrequent rainfall. Temperatures in the San Francisco area average 57 degrees Fahrenheit annually, ranging from the mid-40s in winter to the upper 60s in late summer. Strong onshore flow of wind in summer keeps the air cool, generating fog through September. The warmest temperatures generally occur in September and October. Rainfall in the San Francisco area averages about 22 inches per year and is generally confined to the "wet" season from late October to early May. Except for occasional light drizzles from thick marine stratus clouds, summers are nearly completely dry. A summary of the temperature and rainfall data for the City of San Francisco is included in Table 1.

Table 1: San Francisco Climate Summary

Month	Average Maximum Temperature (°F)	Average Minimum Temperature (°F)	Average Monthly Rainfall (inches)
January	58.0	45.7	4.36
February	60.3	47.3	4.41
March	61.4	48.1	2.98
April	62.3	49.1	1.38
May	63.2	50.9	0.68
June	64.8	52.7	0.18
July	65.6	54.3	0.02
August	66.6	55.3	0.06
September	68.1	55.0	0.19
October	67.8	53.3	1.04
November	61.2	48.1	2.85
December	58.3	45.9	4.33
Annual Average	**63.3**	**50.6**	**22.45**

Source: Western Regional Climate Center (www.wrcc.dri.edu), 1981-2010 data from two San Francisco monitoring stations (Mission Dolores/SF#047772 and Richmond/SF#047767).

3.2 Projected Growth

Projections of population growth in the retail service area through 2040 are presented in ***Section 3.2.2 of the UWMP***. The corresponding LUA 2012projections for housing and employment in San Francisco, which are incorporated into the projected retail water demands, are provided in ***Appendix E of the UWMP***.

3.3 Projected Retail Water Demands

For the 2015 UWMP, the SFPUC developed a new set of models that incorporate socioeconomic factors to project retail demands through 2040. These models incorporate the latest housing and employment projections from LUA 2012. ***See Section 4.1 of the UWMP*** for tabulated retail water demand projections through 2040 and a description of the model methodology.

3.4 Proposed Project Water Demand

Strada Brady, LLC's water resource consultants provided a memo describing the methods and assumptions used to estimate the water demand of the proposed project, along with the resulting demand (Attachment B). The SFPUC reviewed the memo to ensure that the methodology is appropriate for the types of proposed water uses, the assumptions are valid and thoroughly documented along with verifiable data sources, and a professional standard of care was used. The SFPUC concluded that the demand estimates provided by Strada Brady, LLC's consultants are reasonable. Water demand associated with the proposed project over the 20-year planning horizon is shown in the following table.

Table 2: Water Demand Based on Project Phasing

Demand of Proposed Project (mgd)	2020	2025	2030	2035	2040
Potable Demand	–	0.034	0.034	0.034	0.034
Non-potable Demand	–	0.028	0.028	0.028	0.028
Total Demand	–	0.062	0.062	0.062	0.062

mgd = million gallons per day

Notes:
The proposed project would be completed and ready for occupancy by 2021.

The San Francisco Planning Department has determined that the proposed project is encompassed within the projections presented in LUA 2012 as indicated in the letter from the Planning Department to the SFPUC (Attachment A). Therefore, the demand of the proposed project is also encompassed within the San Francisco retail water demands that are presented in ***Section 4.1 of the UWMP***, which considers retail water demand based on the LUA 2012 projections. The following table shows the demand of the proposed project relative to total retail demand.

Table 3: Proposed Project Demand Relative to Total Retail Demand

	2020	2025	2030	2035	2040
Total Retail Demand (mgd)[1]	77.5	79.0	82.3	85.9	89.9
Total Demand of Proposed Project (mgd)	–	0.062	0.062	0.062	0.062
Portion of Total Retail Demand[2]	–	0.08%	0.08%	0.07%	0.07%

Notes:
1. Retail water demands per ***Table 4-1 of the UWMP***.
2. The proposed project is accounted for in the LUA 2012 projections and subsequent retail water demand projections.

4.0 Conclusion

4.1 Comparison of Projected Supply and Demand

Section 7.5 of the UWMP compares the SFPUC's retail water supplies and demands through 2040 during normal year, single dry-, and multiple dry-year periods. See Table 4, below, which is adapted from the UWMP (Table 7-4). As explained previously in Section 3.4, water demands associated with the proposed project are already captured in the retail demand projections presented in the UWMP. The proposed project is expected to represent up to 0.08 percent of the total retail water demand.

Table 4: Projected Supply and Demand Comparison (mgd)

		Normal Year	Single Dry Year[1]	Multiple Dry Years		
				Year 1[1]	Year 2[2]	Year 3[2]
2020	Total Retail Demand[3]	77.5	77.5	77.5	77.5	77.5
	Total Retail Supply[4]	77.5	77.5	77.5	77.5	77.5
	Surplus/(Deficit)	0	0	0	0	0
2025	Total Retail Demand[3]	79.0	79.0	79.0	79.0	79.0
	Total Retail Supply[4]	79.0	79.0	79.0	79.0	79.0
	Surplus/(Deficit)	0	0	0	0	0
2030	Total Retail Demand[3]	82.3	82.3	82.3	82.3	82.3
	Total Retail Supply[4]	82.3	82.3	82.3	82.3	82.3
	Surplus/(Deficit)	0	0	0	0	0
2035	Total Retail Demand[3]	85.9	85.9	85.9	85.9	85.9
	Total Retail Supply[4]	85.9	85.9	85.9	85.9	85.9
	Surplus/(Deficit)	0	0	0	0	0
2040	Total Retail Demand[3]	89.9	89.9	89.9	89.9	89.9
	Total Retail Supply[4]	89.9	89.9	89.9	88.8	88.8
	Surplus/(Deficit)	0	0	0	(1.1)	(1.1)

Notes:
1. During a single dry year and multiple dry year 1, a system-wide shortage of 10% is in effect. Under the Water Shortage Allocation Plan (WSAP), the retail supply allocation at this stage of shortage is 36.0% of available RWS supply, or 85.9 mgd. However, due to the Phased WSIP Variant, only 81 mgd of RWS supply can be delivered. RWS supply is capped at this amount.
2. During multiple dry years 2 and 3, a system-wide shortage of 20% is in effect. Under the WSAP, the retail supply allocation at this stage of shortage is 37.5% of available RWS supply, or 79.5 mgd. RWS supply is capped at this amount.
3. Total retail demands correspond to those in ***Table 4-1 of the UWMP***, and reflect both passive and active conservation, as well as water loss.
4. Total retail supplies correspond to those in ***Table 6-7 of the UWMP***. Procedures for RWS allocations and the WSAP are described in ***Section 8.3 of the UWMP***. Groundwater and recycled water are assumed to be used before RWS supplies to meet retail demand. However, if groundwater and recycled water supplies are not available, up to 81 mgd, or the corresponding capped amount in dry years, of RWS supply could be used.

The LUA 2012 projections result in a retail demand in 2035 of 85.9 mgd, which represents a 5.0 mgd, or 6 percent, increase over the 2035 demand projected in the 2010 UWMP. The ability to meet the demand of the retail customers is in large part due to development of 10 mgd of local WSIP supplies, including conservation, groundwater, and recycled water. These supplies are anticipated to be fully implemented over the next 10 to 15 years.

If planned future water supply projects (i.e., San Francisco Groundwater Supply Project, Westside Recycled Water Project, Eastside Recycled Water Project, and onsite non-potable supplies) are not implemented, normal-year supplies may not be enough to meet projected retail demands. To balance any water supply deficits during normal years, the SFPUC may import additional water from the RWS beyond the retail allocation of 81 mgd, with mitigation implemented by the SFPUC and potential environmental surcharges if RWS deliveries exceed the 265 mgd interim supply limitation.

If dry-year supply projects (i.e., Calaveras Dam Replacement Project, Lower Crystal Springs Dam Improvements Project, Alameda Creek Recapture, Regional Groundwater Storage and Recovery Project, and water transfers) are not implemented, existing dry year supplies may not be enough to meet projected retail demands. To balance any water supply deficits during dry years, the SFPUC may reduce system deliveries and impose customer rationing.

The SFPUC remains committed to meeting the level of service goals and objectives outlined under WSIP. In addition, the SFPUC continues to explore other future supplies, including:

- Development of additional conservation and recycling.
- Development of additional groundwater supplies.
- Securing of additional water transfer volumes.
- Increasing Tuolumne River supply.

4.2 Findings

Regarding the availability of water supplies to serve the proposed project beginning in 2021, the SFPUC finds, based on the entire record before it, as follows:

- During normal years, single dry years, and multiple dry years, the SFPUC has sufficient water supplies to serve the proposed project.
- With the addition of planned retail supplies, the SFPUC has sufficient water supplies available to serve its retail customers, including the demands of the proposed project, existing customers, and foreseeable future development.

Approval of this WSA by the Commission is not equivalent to approval of the development project for which the WSA is prepared. A WSA is an informational document required to be prepared for use in the City's environmental review of a project under CEQA. It assesses the adequacy of water supplies to serve the proposed project and cumulative demand.

Furthermore, this WSA is not a "will serve" letter and does not verify the adequacy of existing distribution system capacity to serve the proposed project. A "will serve" letter and/or hydraulic analysis must be requested separately from the SFPUC City Distribution Division to verify hydraulic capacity.

If there are any questions or concerns, please contact Steve Ritchie at (415) 934-5736 or SRitchie@sfwater.org.

Attachment A –

Communications from San Francisco Planning Department

SAN FRANCISCO
PLANNING DEPARTMENT

MEMO

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

DATE: June 13, 2013

TO: SF Planning EP Planners & SFPUC Planners

FROM: Scott T. Edmondson, AICP; Aksel Olsen

RE: Project Types Represented in the Land Use Allocation

This Memorandum explains the Planning Department's Land Use Allocation (LUA) and the types of projects included in the LUA. The 2012 LUA is the most recent update and uses the Association of Bay Area Governments' (ABAG) May 2012 Jobs-Housing Connection Scenario. As this memorandum explains, the Planning Department expects that the LUA will encompass the vast majority of development proposals that project sponsors will present to the Planning Department. This memorandum also identifies possible unusual circumstances under which EP Planners and the SF PUC Planners may want to consult further with the Planning Department's Information and Analysis Group to determine whether a project is encompassed within the LUA.

ABAG's Projections of San Francisco's Economic Growth and the LUA

The LUA takes ABAG's 30-year projections of citywide household and job growth and allocates them to smaller geographic units, in this case, the traffic analysis zones of the SF Transportation Authority's Countywide Transportation Model. Thus, the LUA does not project growth but simply allocates ABAG's growth projections to subarea locations within the city. The current 2012 LUA uses ABAG's Jobs-Housing Connection Scenario projections for San Francisco and covers the period from 2010 to 2040; these projections were released in May 2012 and are represented in five-year increments.

ABAG derives its demographic and economic growth projections from assumptions about long-term demographic and economic growth.[1] ABAG maintains its own set of regional models and develops each forecast with its in-house experts and private economic consultants.[2] The forecasting is informed by the best information and assumptions available through federal and State agencies, such as the State Department of Finance, and private sources. However, ABAG develops its forecast based on local knowledge from over 50 years of forecasting and develops the forecast to reflect local conditions in contrast to more general forecasting assumptions of State or federal sources. ABAG's estimate of total citywide growth for the 30-year period is expected to best represent actual growth at the end of the 30-year period. However, projected growth for any portion of the projection period, such as growth in a one-year or a five-year period, would be expected to vary from actual growth in such periods. Within the 30-year growth projection period, higher than average growth periods could be followed by lower than average growth periods such that growth over the period would ultimately equal the projected 30-year

total. All projection methodologies make assumptions based on the best available information at the time. To minimize the effects of imprecision intrinsic to any projections methodology when used in for planning decisions, ABAG follows professional best practices and updates its projections every two years. Accordingly, the Planning Department updates its LUA every two years. The planning practice of frequently updating projections and plans allows the incorporation of new information over time to provide for the most up-to-date projections.

The SFPUC updates its Urban Water Management Plan (UWMP) every five years. The UWMP typically relies on LUA projections or similar information. But, because the LUA is updated every two years, the SFPUC may want to review the LUA issued within SFPUC's 5-year UWMP cycle; and if it varies in a significant way from the SFPUC's projections used in its UWMP, discuss with Planning whether it should make any changes in its own water supply needs assessment during an UWMP cycle.

Types of Projects Included in the LUA

The LUA translates ABAG's projected household and job growth into total expected development in San Francisco over a 30-year period. The LUA translates ABAG's household growth into residential housing units and ABAG's job growth into commercial space.[3] Thus, the LUA projections of housing units and commercial space include all project types expected from San Francisco growth, such as housing, office, retail, production-distribution-repair (PDR), visitor, and cultural-institutional-educational (CIE). The LUA does not exclude any project type or potential growth. As such, the LUA and the ABAG economic projections upon which it is based contain the best estimates available of reasonably foreseeable growth and development in San Francisco over a 30-year period.

Unusual Circumstances

The LUA can be considered to include all reasonably expected growth and development and it is frequently updated to correct for expected variations. Nevertheless, there are possible unusual circumstances under which the EP Planners or SFPUC Planners may want to request further Planning Department consultation with the Information and Analysis Group to determine if a particular project falls within the LUA. ABAG's projections and the Department's LUA take into account urban economic trends and based on that information capture all reasonably foreseeable growth in San Francisco. Limited capital and aggregate demand of any urban economy constrains growth. However, occasionally the reality or perception may arise that a project lies outside the normal growth constraints of the San Francisco economy for some reason, and therefore lies outside ABAG's projection's and the Department's current spatial allocation in its LUA.

One can envision the rare case of a project arising outside the City's economy (demand and capital) from an organization not located in San Francisco using nonprofit foundation funds or private donations to construct a large institutional project in San Francisco, such as a major hospital, a university, or an office complex. These projects would represent spending and demand beyond that normally active in the San Francisco economy, and therefore represent net additions to projected growth beyond that captured by ABAG's projections and reflected in the Department's LUA. Indicative characteristics of such projects

would include those with non-local sponsors, of large size, and for an institutional land use. Alternatively, very large project proposals from local project sponsors active in the SF economy involving a large site, land assembly, a planned unit development (PUDs), master plans, or area plan and rezoning proposals may warrant individual assessment for a range of reasons even though they are likely captured in ABAG's projections and the LUA. Such projects would be similar to recent projects such as Hunters Point/Candlestick, Park Merced, Treasure Island, Pier 70 Master Plan, Eastern Neighborhoods, or the Transit Center District Plan.

The bi-annual update of ABAG's projections and the LUA would be able to capture development associated with such projects. However, should such a project be proposed between updates, the EP Planners and SFPUC could treat its appearance as sufficient cause to request the Planning Department's assistance in determining whether to consider the project outside the latest LUA projections.

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[1] Please see ABAG's summary of its research and forecasting on its website: http://www.abag.ca.gov/planning/research/index.html

[2] ABAG describes its current Jobs-Housing Scenario policy-based forecast here: http://onebayarea.org/pdf/JHCS/May_2012_Jobs_Housing_Connection_Strategy_Appendices_Low_Res.pdf.

[3] The LUA citywide totals only differ slightly, up to within one percent of ABAG totals (+/-). The difference is produced by LUA's complex method of translating ABAG projections into development (residential units and commercial space) and allocating total citywide growth to subarea locations. The minor difference between the LUA and ABAG citywide totals is real in absolute terms, but not in the sense that they are different projections. The one percent difference does not constitute a difference of projections. ABAG and MTC consider variation of one percent in citywide totals, plus or minus, as sufficiently representing ABAG's projections for consistency with the MTC regional projections and modeling purposes (congestion management, etc.). Even if a few versions of the LUA must be done to make minor subarea spatial allocation corrections, as long as the LUA's citywide totals are within one percent of ABAG's projections, and ABAG's projections have not changed, the LUA citywide totals have not effectively changed either. Any of those LUA versions' citywide totals fully represent the same unchanged ABAG projection totals.

Attachment B –

1629 Market Street Project Demand Memo

ESA

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memorandum

date September 12, 2016

to Debra Dwyer, San Francisco Planning Department, Environmental Planning

from William Goodman and Katie Hofstetter, Strada Investment Group

subject 1629 Market Street: Water Supply Assessment Request

The purpose of the memorandum is to provide the specific project information necessary for the San Francisco Public Utilities Commission (SFPUC) to prepare a Water Supply Assessment (WSA) for the proposed 1629 Market Street project (proposed project). This memo provides a brief project description, description of alternatives, and estimated project water and wastewater demands for the proposed project, based on the calculations developed in the SFPUC Non-Potable Water Calculator, Version 3.3.

Project Description

The project sponsor, Strada Brady, LLC, proposes to completely demolish the United Association Local 38 Plumbers and Pipefitter's Union Hall (UA Local 38) building, partially demolish the retail building at 1637 Market Street and add a vertical addition, and rehabilitate the Civic Center Hotel and add a vertical addition. The proposed project (Assessor's Block 3505, Lots 001, 007, 008, 027, 028, 029, 031, 031A, 032, 032A, 033, 033A, 034, and 035) would include construction of approximately 477 market-rate residential rental units and about 9,275 square feet of retail/restaurant space along Market, 12th, and Brady Streets in four buildings (including the two vertical additions added to the rehabilitated Civic Center Hotel and behind the retained Market Street façade of the retail building at 1637 Market Street); construction of a fifth building containing an additional 107 units of affordable housing with on-site social services; and construction of a sixth building containing an approximately 27,300-square-foot new union hall and offices for UA Local 38. The planned Brady Street open space would be developed, in addition to open space in courtyards between the four market-rate buildings, which would extend southward from Market Street with their principal axes perpendicular to the street. Each of these four buildings and the supportive housing building, which would front on Colton Street, would include additional common open space for residents on the rooftops. The project site is located on the south side of Market Street between Brady and 12th streets, within San Francisco's Market and Octavia Area Plan. **Table 1** provides a summary of the relevant project information.

TABLE 1 – PROJECT INFORMATION

Project Name	**1629 Market Street**
Case No.	2015-005848ENV
Estimated Construction Date	Early-2020
Project Contact	Debra Dwyer – (415) 575-9031, debra.dwyer@sfgov.org
Project Address	1629 Market Street
Block/Lot	3505/ 001, 007, 008, 027, 028, 029, 031, 031A, 032, 032A, 033, 033A, 034, and 035
Project Site Size	97,618 square feet (2.2-acres)
Days In Operation Per Year	365 residential days (260 office working days; 352 retail days)

Proposed Project

The residential and retail/restaurant component would comprise four market-rate, eight- to ten-story, 65- to 85-foot-tall buildings along Market, Brady, and 12th streets and within the project site area containing 477 dwelling units, two of which would provide rooftop decks. An approximately 140-foot-long portion of the existing frontage of the 1637 Market Street retail building would be retained and used for the proposed retail uses along Market Street. Similarly, the existing Civic Center Hotel at 12th and Market streets would be retained with a vertical addition for residential uses and retail uses on the ground floor. The fifth residential building would contain 107 affordable housing units in a six-story building located on Colton Street; a rooftop deck also would be provided. The proposed residential and retail/restaurant component would contain approximately 498,142 gross square feet (gsf) of residential space, 9,275 gsf of retail/restaurant space on the first and second floors (approximately 6,275 gsf of retail and 3,000 gsf of restaurant), and approximately 17,542 gsf of common residential open space in the form of roof decks, and ground-floor open space. Project characteristics are shown in **Table 2**.

Proposed Use	**Total Proposed (gsf)**
Residential Uses	498,142
Retail/Restaurant	9,275
Office	27,296
Basement/Parking/Mechanical/Loading	98,736
TOTAL	**633,449**
Total Site Area	97,617
Impervious Roof Area [a]	55,989
Other Impervious Area [b]	17,968
Open Space [c]	20,750
Total Dwelling Units	584 units
Height of Buildings	65 to 85 feet

Notes:

[a] Excludes green roof features (factored under open space)

[b] Includes sidewalks and impervious alley and courtyard areas.

[c] Includes residential access roof decks, and publicly-accessible open spaces.

SOURCE: Kennerly Architecture and Planning, Strada Investment Group, June 2016.

The UA Local 38 component would comprise a 27,296 gsf, four-story, 65-foot-tall building on the corner of Market Street and 12th streets. An approximately 4,535-square-foot, publicly-accessible mid-block alley would separate two of the residential components and afford pedestrian connectivity through the project site, providing access from Market Street to the 18,148-square-foot Brady Square Park.

Tables 3, 4, and **5** show information pertinent to the estimate of water demand for the proposed project; this includes the proposed office, retail/restaurant, and residential square footages as well as the site coverage data. The land uses and site coverage data are based on the total square footage of the proposed project, as well as total employment, housing unit occupancy, and square footage of impervious or landscaped area. As the types of retail uses are not known at this time, it is assumed for the purposes of calculating water demand that the building would employ general retail uses. Consistent with the City's Non-Potable Water Ordinance, it is likely that actual project water demand will be lower, after incorporation of the use of low-flow fixtures and other water saving measures (including reuse), that are not yet fully defined at this time.

TABLE 3 – PROPOSED PROJECT, BUILDING INPUTS

Proposed Use	Total Proposed (gsf)	Days in Use	GSF Per Land Use		Commercial Use Occupancy	
			FTE	Transient FTE	Estimated FTE	Estimated Transient FTE
Office	27,296	260	250	0	109	0
Retail	6,275	352	550	130	11	48
Restaurant	3,000	352	435	95	7	32
TOTAL	**36,571**	**-**	**-**	**-**	**127**	**80**

Between the general office, retail, and restaurant care uses on site, it is anticipated that the project would employ approximately 127 FTEs and 80 transient FTEs at buildout. Likewise, for residential occupancy of the proposed project, default values of 2.01 persons per household were used for an estimated 1,174 residents living onsite at buildout.

TABLE 4 – PROPOSED PROJECT, RESIDENTIAL INPUTS

Data Inputs		
Residential Type		multi-family
Occupancy	2.01	persons per household unit
Number of Residential Units	584	units
Residential Gross Area	498,142	gsf
Number of Residential Occupants	1,174	people
Days in Operation	365	days

"Project coverage" refers to the permeability of materials used onsite. Just over half of the project site would be covered in impervious surfaces, which would include the roof and sidewalk/alleyway areas. More than half of the site area would consist of rooftop open spaces, which would be a mix of paving and landscaped areas.

TABLE 5 – PROPOSED PROJECT, COVERAGE

Surface	Area	
Impervious Area	**73,957**	**gsf**
Roof	*55,989*	gsf
Sidewalks/ Open Space	*17,968*	gsf
Pervious Area	**20,750**	**gsf**
Landscaped Area [a]	*11,979*	gsf
Green Roof	*8,771*	gsf

[a] Open Space does not assume turfgrass, as features do not involve turfgrass development

Proposed Project – Demand

Table 6 shows the estimated daily and annual water demand for the proposed project by land use category. As shown, the total water use for the project would be 62,038 gallons per day (gpd), or 22.76 million gallons per year (gpy). Of the total water demand, 62,038 gpd would be for indoor water use and 463 gpd would be for irrigation purposes. In addition, SFPUC estimates that approximately 90 percent pf water supplied is discharged as wastewater into the sewer system; therefore, the project would discharge around 55,834 mgd, or 20.3 million gpy, of wastewater. Lastly, because the project would comply with the City's Non-potable Water Ordinance, other water saving measures not yet determined at this time, but which could involve water efficient fixtures and onsite reuse, could result in the availability of 28,080 gpd, or 10,249,153 gpy of greywater to offset projected water demand.

TABLE 6 - PROPOSED PROJECT, ESTIMATED DEMAND

Proposed Use	Estimated Daily Water Demand (gpd)	Estimated Annual Water Demand (gpy)
Commercial water demand	1,063	339,589
Potential greywater generated and available for reuse	*32*	*11,688*
Multi-Family water demand	55,348	20,201,921
Potential greywater generated and available for reuse	*28,048*	*10,237,465*
HVAC/Cooling water demand[a]	5,627	2,053,860
Irrigation	N/A	168,832
TOTAL[b]	**62,038**	**22,764,202**
Wastewater Discharge (at 90% non-landscape water supplied)	**55,834**	**20,335,833**
Total Greywater Available For Reuse	***28,080***	***10,249,153***

[a] Assumes 171,155 gal/month
b Does not reflect offset of potable demands with greywater sources